

# Volume 2 Introduction:

## Responses to Comments

Volume 2 presents the comments received on the Draft Environmental Impact Report (EIR) and responses to those comments.

### V2.1 Response to Comments

Section 15088(a) of the state *California Environmental Quality Act (CEQA) Guidelines* states that “[t]he 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 these requirements, this volume of the EIR provides responses to each of the written comments received on the Original Draft EIR and Partially Recirculated Draft EIR during the public review periods.

The Original Draft EIR for the Proposed Project was circulated for an extended comment period (105 days), from July 10, 2014, to October 23, 2014. Subsequently, the Partially Recirculated Draft EIR for the Proposed Project was circulated for an extended comment period (60 days), from November 9, 2016, to January 9, 2017. During these review periods, the Los Angeles County Department of Regional Planning received a total of 390 comment letters from agencies, organizations, and interested groups and persons.

The response to comments consists of three parts: (1) Topical Responses prepared to address comment themes, (2) responses to comments received on the Original Draft EIR, and (3) responses to comments received on the Partially Recirculated Draft EIR.

Volume 2A includes the Topical Responses to Comments, discussed below in Section V2.1.1, and responses to comments received on the Original Draft EIR, discussed below in Section V2.1.2. Volume 2B includes responses to comments received on the Partially Recirculated Draft EIR, discussed below in Section V2.1.3.

#### V2.1.1 Topical Responses to Comments

Topical Responses were prepared to address comments that were recurrently raised during the public review periods for both the Original Draft EIR and the Recirculated Draft EIR. The Topical Responses provide information deemed helpful to clarify the environmental analysis in the Original Draft EIR and/or Partially Recirculated EIR, as well as provide a comprehensive response to comments received regarding that particular topic.

Topical Responses and the subjects they address are listed below.

- Topical Response #1: Air Quality
- Topical Response #2: Biological Resources
- Topical Response #3: Composting Facility and Conversion Technology
- Topical Response #4: Conditional Use Permit Compliance
- Topical Response #5: Conditional Use Permit and Community Agreement
- Topical Response #6: Cultural Resources
- Topical Response #7: Cumulative Impacts
- Topical Response #8: Disposal Rate and Capacity

- Topical Response #9: Environmental Justice
- Topical Response #10: Environmental Monitoring
- Topical Response #11: Geologic Hazards
- Topical Response #12: Greenhouse Gas Emissions and Climate Change
- Topical Response #13: Household Hazardous Waste Facility
- Topical Response #14: Landfill Liner System
- Topical Response #15: Land Use
- Topical Response #16: Noise
- Topical Response #17: Odor
- Topical Response #18: Project Alternatives
- Topical Response #19: Project Need
- Topical Response #20: Property Values
- Topical Response #21: Public Health
- Topical Response #22: Public Scoping and Public Outreach
- Topical Response #23: Public Services and Utilities
- Topical Response #24: Source of Waste Importation of Out-of-County Waste
- Topical Response #25: Traffic
- Topical Response #26: Treated Auto Shredder Waste and Shredded Tires
- Topical Response #27: Visual Resources
- Topical Response #28: Waste Diverted
- Topical Response #29: Wastes to be Disposed and Waste Screening and Acceptance Program
- Topical Response #30: Water Quality
- Topical Response #31: Limited Operational Waiver
- Topical Response #32: Establishment of Baseline
- Topical Response #33: Recirculation
- Topical Response #34: Beneficial Use

## V2.1.2 Responses to Comments Received on Original Draft EIR

Comment letters 1 through 97 were received on the Original Draft EIR. Table V2-1 identifies the agency, organization, interested group, or individual who provided comments. The public hearing transcript from July 31, 2014, is included as Comment Letter No. 10, and individuals who provided oral testimony are identified. Table V2-1 is placed at the end of this Introduction.

Written responses are provided for each comment received during the public review period. Written responses are also provided for oral testimony received at the July 31, 2014, Hearing Examiner meeting. As identified in Table V2-1, each comment letter has been assigned a unique letter number and, within each letter, individual comments have been uniquely numbered to facilitate responses. Copies of each

comment letter, with assigned comment numbers, are provided prior to each response; written responses are provided immediately following each comment letter.

Comments and their associated responses are addressed either by referring the commenter to one or more Topical Responses, or by providing an individual response to comments provided on the Original Draft EIR.

### V2.1.3 Responses to Comments Received on Partially Recirculated Draft EIR

Comment letters 98 through 391 were received on the Partially Recirculated Draft EIR. Table V2-1 identifies the agency, organization, interested group, or individual who provided comments. The public hearing transcript from December 15, 2016, is included as Comment Letter No. 198, and individuals who provided oral testimony are identified. Table V2-1 is placed at the end of this Introduction.

Written responses are provided for each comment received during the public review period. Written responses are also provided for oral testimony received at the December 15, 2016 Hearing Examiner meeting. As identified in Table V2-1, each comment letter has been assigned a unique letter number and, within each letter, individual comments have been uniquely numbered to facilitate responses. Copies of each comment letter, with assigned comment numbers, are provided prior to each response; written responses are provided immediately following each comment letter.

Comments and their associated responses are addressed either by referring the commenter to one or more Topical Responses, or by providing an individual response to comments provided on the Partially Recirculated Draft EIR.

**Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR**

<b>Letter No.</b>	<b>Agency/Organization/Interested Group/Person</b>
1	Tribal Historic and Cultural Preservation - Tataviam Band of Mission Indians
2	Native American Heritage Commission
3	Dabbagh Family (Akram, April, Andrew, Jordan)
4	Los Angeles County Solid Waste Management Committee (Task Force)
5	Lloyd Carder
6	Michael Mohajer
7	Lloyd Carder
8	Unknown
9	Unknown
10	Hearing Examiner Oral Testimony, as documented in transcript of hearing
	Flo Lawrence
	Martin Kreisler
	Nancy Carder
	Lynne Plambeck
	Lloyd Carder
	Ramon Hamilton
	Paul Saaty
	Akram Dabbagh
	Cam Noltemeyer
	Michael Mohajer
	Steven Howse

**Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR**

Letter No.	Agency/Organization/Interested Group/Person
	Cynthia Kimura
	Humberto Paniagua
	Darcy Stinson
	Jeremiah Dockray
	Steven Lee
	Erica Larson
	Percy Sims
	Faye Snyder
	Robert Kelly
	Greg Kimura
	Paul Simmonds
	Jessica Chambers
	Stephanie Ebia
	Archie Banas
	Tim Patterson
	Amber Elton
11	Tribal Historic and Cultural Preservation - Tataviam Band of Mission Indians
12	Kathy Howse
13	Sara Sage
14	Greg Kimura c/o VVCAC
15	Greg Kimura c/o VVCAC
16	Greg Kimura c/o VVCAC
17	Greg Kimura c/o VVCAC
18	Greg Kimura c/o VVCAC
19	Greg Kimura c/o VVCAC
20	Greg Kimura c/o VVCAC
21	Los Angeles County Business Federation
22	Raul Lejano
23	Los Angeles County Solid Waste Management Committee (Task Force)
24	Caltrans
25	Assembly California Legislature
26	Los Angeles County Disposal Association
27	Valley Industry Association
28	Santa Clarita Valley Chamber of Commerce
29	Citizens for CCL Compliance (C4CCLC)
30	Chris Burnside
31	Castaic Area Chamber of Commerce
32	West Ranch Town Council

Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR

Letter No.	Agency/Organization/Interested Group/Person
33	Santa Clarita Valley Economic Development Corporation
34	Faye Snyder
35	GreenAction
36	CalRecycle
37	Ventura County Watershed Protection District
38	Santa Clarita Valley Latino Chamber of Commerce
39	California Department of Fish and Wildlife
40	South Coast Air Quality Management District
41	Ventura County Resource Management Agency
42	Southern California Edison
43	GreenAction
44	Department of Conservation, Division of Oil, Gas, and Geothermal Resources
45	Los Angeles County Fire Department
46	Craig Banta
47	Denice Bishop
48	Greg and Tanya Hauser
49	Citizens for CCL Compliance (C4CCLC)
50	Natalie Tate
51	Los Angeles County Department of Public Health
52	City of Santa Clarita
53	Faye Snyder
54	Ira de Cleir
55	Ventura County Resource Management Agency - Air Pollution Control District
56	Lloyd Carder
57	Nancy Carder
58	Law Office of Justin Kline
59	Val Verde Civic Association
60	Santa Clarita Organization for Planning and the Environment (SCOPE)
61	Los Angeles County Department of Public Works
62	Jeremiah Dockray
63	Susan Evans
64	Sierra Club
65	Sara Sage
66	Erica Larson
67	Cynthia Kimura
68	Josephine Esplana
69	David Bossert
70	Amy Daniels

**Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR**

<b>Letter No.</b>	<b>Agency/Organization/Interested Group/Person</b>
71	Fred Arnold
72	Mike Lebecki
73	Gloria Mercado-Fortine
74	Montse Garriga
75	Brian Higgins
76	Margie Anne Clark
77	Barbara Myler
78	Rachelle Dardeau
79	Sue Nevius
80	Don Fleming
81	Setareh Khatibi
82	Moe and Linda Hafizi
83	Vanessa Brookman
84	Linda Lieblang
85	Sue Reynolds
86	Martin Kreisler
87	Jeri Seratti-Goldman
88	Renee Sabol
89	Clay Friedman
90	Jack Crawford
91	Ed Masterson
92	Maria Gutzeit
93	Paul De La Cerda
94	Flo Lawrence
95	Golden State Gateway Coalition
96	Chris Chapleau
97	Randall Winter
98	Steve Lee
99	Susan Evans
100	Abigail DeSesa
101	Dr. Randy Martin
102	Greg and Tanya Hauser
103	David Salinas
104	Margaret Newbauer
105	Susan Evans
106	Dee Porter
107	SCOPE
108	Susan Evans

Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR

Letter No.	Agency/Organization/Interested Group/Person
109	Suzie Rizzo
110	Faye Snyder
111	Martha Kampbell
112	Chad Kampbell
113	Michael Foerster
114	Michael Foerster
115	Ron Bottorff
116	Latiska Smith
117	Bob Ponder
118	Thomas L.
119	Graciela Lopez
120	George Selph
121	Desiree Perez
122	Danielle Perez
123	Kathy Howse
124	Gary Howse
125	Name Eligible
126	Kenneth Gray
127	Jennifer Fields
128	Name Eligible
129	Suzie Cupp
130	Paul Cupp
131	Elizabeth V.
132	Rosario Gonzalez
133	Joseph Lopez
134	Janai Leeb
135	Patricia Gonzalez
136	Dustin Fields
137	Mayra Kumirez
138	Hortencia Ramirez
139	Veronica Miele
140	Linnea Hollowell
141	Cliff Fletcher
142	Suzie Rizzo
143	Barbara McCoy
144	Barbara McCoy
145	Marilyn Logan
146	Marilyn Logan

**Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR**

Letter No.	Agency/Organization/Interested Group/Person
147	Maya Loch
148	Maya Loch
149	Valerie Swanson
150	Valerie Swanson
151	Roselva Ungar
152	Roselva Ungar
153	Emily Klatt
154	Emily Klatt
155	Eric Klatt
156	Eric Klatt
157	Renee Foley
158	Renee Foley
159	Glenda Nowakowski
160	Glenda Nowakowski
161	Ingrid Van Dorn
162	Ingrid Van Dorn
163	Richard Lott
164	Richard Lott
165	Barbara Cogswell
166	Barbara Cogswell
167	Lourdes Villacorte
168	Lourdes Villacorte
169	Dru Hiller
170	Dru Hiller
171	Elinor McGree
172	Marianne Bakic
173	Leon Kasparian
174	Barbara Wampole
175	Barbara Wampole
176	Barbara Wilson
177	Beth Jenkins
178	Steve Tannehill
179	Nevin Oliphant
180	Nevin Oliphant
181	Brian Huckeba
182	Peter Farriday
183	Malcolm Blue
184	Steve Lee

Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR

Letter No.	Agency/Organization/Interested Group/Person
185	Lloyd Carder
186	Sandia Ennis
187	Greg and Tanya Hauser
188	Michael Mohajer
189	Kara Wily
190	Greg and Tanya Hauser
191	Karla Edwards
192	Karla Edwards
193	Alivia Hannant
194	Arielle Hannant
195	Julie Hannant
196	Kevin Hannant
197	Sierra Club
198	Hearing Examiner Oral Testimony, as documented in transcript of hearing:
	Andre Hollins
	Dave Bossert
	Lois Bajio
	Marty Kreisler
	Barbara Myler
	Randy Wrage
	David Menchaca
	John Paladin
	Carl Boyer
	Steve Lee
	Tanya Hauser
	Faye Snyder
	Nancy Carder
	Lloyd Carder
	Camillis Noltemeyer
	Sally White
	Susan Evans
	Shane Weeks
	Sara Sage
	Julie Olsen
Lynne Planbeck	
Elizabeth Rydall	
Kara Wily	
Erica Larsen	

**Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR**

Letter No.	Agency/Organization/Interested Group/Person
	Suzanne Ridgewell
	Jeremiah Dockray
	Richard Humanic
	Stacy Fortner
	Steve Howse
	Bonnie Nikolia
	Patti Skinner Sulpizio
	Logan Smith
	Barbara Wampole
	Thomas Barron
	Darcy Stinson
	Byran Caforio
	Alan Ferdman
	Joe Cicero
	Rebecca Martens
	Paul Simmonds
	Merit Migliore
	Abigail DeSea
	Mai Do
	Materials provided by attendees at the time of hearing:
	Kara Wily
	Lynne Plambeck
	Carl Boyer
	Steven Lee
	Tanya Hauser
	Dr. Faye Snyder
	Nancy Carder
	Lloyd Carder
	Sally White
	Shane Weeks
	Carmillis Noltemeyer
	Sara Sage
	Susie Evans
	Julie Olsen
	Elizabeth Rydall
	Erica Larsen
	Richard Humanic
	Steven Howse

**Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR**

Letter No.	Agency/Organization/Interested Group/Person
	Suzanne Ridgewell
	Stacy Fortner
	Bonnie Nikolai
	Patti Sulpizio
	Logan Smith
	Barbara Wampole
	Thomas Barron
	Darcy Stinson
	Bryan Caforio
	Alan Ferdman
	Joe Cicero
	Rebecca Martens
	Paul Simmonds
	Merit Migliore
	Abigail DeSesa
	Mai Do
	Jeremiah Dockray
	Andre Hollings
	David Bossert
	Lois Bauccio
	Marty Kreisler
	Randy Wrage
	David Menchaca
	Alan Ferdman
	Barbara Myler
	Barbara Myler
	Charla Curtis
	Meta King
	Kimberly Moraes
	Kevan Smalley
	John Paladin
	Linda Whitehead
	Ingrid Van Dorn
	Heidi Bunch
	Julie Davenport
	Drew Richard
	Dee Porter
	Jody Evans

**Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR**

Letter No.	Agency/Organization/Interested Group/Person
	Roselya Ungar
	Jim Soliz
	Frank Miscione
	Tanya Hauser
	Tanya Hauser
	Castaic Area Town Council
	Elizabeth Rydall
	Susanna Battin
	Lloyd Carder
	Marty Kreisler
	Patty Sulpizio
	Susan Evans
	Tom Poteet
	Susan Uchiyama
	Cheryl Bernstein
	Brenda Poteet
	Leslie Russell
	Mitchell Russel
	Wendy Morgan
	Barbara Burton
	Max Gentner
	Dylan Gentner
	Jill Gentner
	Jay Gentner
	Chiquita Canyon Landfill Air Sampling
199	Cynthia Gise
200	Eric Logan
201	Louise Logan
202	Val Verde Civic Association
203	Kathy Brown
204	Laura Logan
205	Douglas Brown
206	David Brown
207	Michael Brown
208	Geoffrey Brown
209	Theresa Brown
210	Michelle Logan
211	Dee Porter

Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR

Letter No.	Agency/Organization/Interested Group/Person
212	Gavin Klinger
213	Deborah Garber
214	Julie-Anne Anthony
215	Scott Ervin
216	Diane Morfino
217	Maria Farias
218	Courtney Kang
219	Stephanie Berry
220	Andrea Pilkington
221	April McKenzie
222	Name Not Provided
223	Jordana Sklar
224	Jay Hilliard
225	Jay Hilliard
226	Tiffni Altes
227	Nancy Yakshe
228	Rose Marie Narciso
229	Terry Kanakri
230	Kelly Wasserman
231	Jackie Thomas
232	Maureen Hinton
233	Rose Marie Narciso
234	Nate Munson
235	Name Not Provided
236	Todd Smith
237	Shannon Trudell
238	Shawn & Cathy Walther
239	Wesley Furr
240	Gisela Belacic
241	Eric Etheridge
242	David Ortiz
243	Jose Carranza
244	Kathy Howse
245	Courtney Cook
246	Aimee Merrilees
247	Sheila M. Schultz
248	Pam Ivy
249	Carson

**Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR**

Letter No.	Agency/Organization/Interested Group/Person
250	Stephanie Smith
251	Sara Schaaf
252	Katherine Regalado
253	Mike & Sharon Padgett
254	George Padgett
255	Sharon Padgett
256	Patricia Krieger
257	Don and Carolyn Strametz
258	Kimberly Thurman
259	Bmccoy
260	Jacek Pirog
261	Toma Watt
262	Rebecca Martens
263	Aimee Merrilees
264	Christie Manno
265	Mike Hammer
266	Richard Meyers
267	Christopher Baurer
268	Rick Bartz
269	Jodi Porter
270	Michelle Sypher
271	Jodi Culluffo
272	Cynthia Phillips
273	Tricia Woodland
274	Stephen K. Peoples
275	Renee Erlenbach
276	Shannon Abarca
277	Michelle Waxman
278	Ron Cunningham
279	Kelly Kacmar
280	Sally White
281	Cody Clark
282	Terry Prather
283	Cody Clark
284	Michael Kulka
285	Vaughn Aukamp
286	Faye Snyder
287	Henry Knebel

Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR

Letter No.	Agency/Organization/Interested Group/Person
288	CalRecycle
289	Kimberly Moraes
290	Susan Evans
291	Susan Evans
292	Steve Lee
293	Steve Lee
294	Ventura County Resource Management Agency
295	Ventura County Watershed Protection District
296	South Coast Air Quality Management District
297	Los Angeles County Department of Public Health
298	Los Angeles County Solid Waste Management Committee (Task Force)
299	California Department of Fish and Wildlife
300	City of Santa Clarita
301	Grant J. Young
302	C4CCLC
303	C4CCLC
304	Archie Banas
305	Steve Lee
306	Joline Kelley
307	Nancy Carder
308	Greg and Tanya Hauser
309	Eneida Besko
310	Shem Guzman
311	Lisa D. Mott
312	Ray A. Guzman
313	Martha Wilcox
314	Meta King
315	Charla Curtis
316	Rose Hernandez
317	Elizabeth Hernandez
318	Jacob Hernandez
319	Leonard Winz
320	Jordan Davis
321	Perry Ramstad
322	Mikyong Kim
323	Maria Rosario Rodriguez
324	Meagan Hicks
325	Robert Hicks

**Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR**

<b>Letter No.</b>	<b>Agency/Organization/Interested Group/Person</b>
326	Valerie Hicks
327	Brandi Hicks
328	Madeleine White
329	Peggy Reed
330	Randall Reed
331	Corinne Harris
332	Betty Harris
333	Amber Hagkull
334	Nicole Elias
335	Nicole D. Thome
336	Colleen Crabtree
337	David W. Porter Jr.
338	Hector Salgado
339	Carla Way
340	Linda Buchanan
341	Judith Greenberg
342	Richard Freedman
343	Alyssia Johnson
344	Lynne Wiebe
345	Kimberly Korakis
346	Micaela Lee
347	Karen Haws
348	Myles White
349	Lupe Fennick
350	Hyun Oh
351	Jamie Gonzaga
352	Derek Estomago
353	Ruth Fehrman
354	Marcelle Gorham
355	Jenine McGraw
356	Jamie Fra
357	Julian Almanaz
358	Kathleen MacDonald
359	Kim McEwen
360	Nelupa Silva
361	Caterina Giovine
362	Tanya W. Jundt
363	Ivy Hedge

Table V2-1. Comment Letters Received on Original Draft EIR and Partially Recirculated Draft EIR

Letter No.	Agency/Organization/Interested Group/Person
364	Jennifer Gomez
365	Michael Kavathias
366	Veronica Rivera
367	Debbie Wise
368	Georgie Widdison
369	James Jeffares
370	Steven A. Vergara
371	Viviana Valenzuela
372	Rosemarie Doherty
373	Noah Lubell
374	Kara Springer Wily
375	Richard Drezl
376	Susan M. Evans
377	Lloyd Carder
378	Linda Swartz
379	Silke Thode
380	John Paladin
381	Marilyn Paladin
382	Rouzanna Paladin
383	Chad Nankervis
384	Shane Weeks
385	Erica Larsen-Dockray
386	Jeremiah Dockray
387	Joline Kelley
388	Lisa Soares
389	SCOPE
390	Caltrans
391	Los Angeles County Fire Department

# CCL Topical Responses

## 1. Air Quality

### 1a. Existing Air Quality and Emissions, Monitoring, and Health Effects

Commenters stated that existing operations at Chiquita Canyon Landfill (CCL) result in air contaminant emissions, exposures to pollutants, nuisance odors, and health effects. They also stated that the air quality monitoring data used in the study are not adequate to characterize existing air quality conditions at CCL and in the surrounding neighborhoods. Commenters requested monitoring for pollutants such as vinyl chloride, hydrogen sulfide, ammonia, and other chemicals in the immediate vicinity of the landfill, with release of the results to the public.

#### **Response – Existing Air Quality**

Existing air quality conditions in the Proposed Project area are described in Chapter 11, Air Quality, of the Partially Recirculated Draft Environmental Impact Report (EIR). Chapter 11, Air Quality (Final EIR) also describes the U.S. Environmental Protection Agency and California Air Resources Board (CARB) processes for attainment and nonattainment designation.

CEQA does not require analysis of impacts from baseline (existing permitted conditions), only the potential impacts of the Proposed Project. However, existing air quality and pollutant concentrations in the project area are provided and discussed in the revised air quality chapter of the Partially Recirculated Draft EIR. Table 11-1 of the Partially Recirculated Draft EIR includes a list of current best management practices (BMPs) and emission reduction measures at CCL. Table 11-1 includes current emission reduction measures and BMPs incorporated as project design measures, including BMPs to reduce construction, operation and composting emissions.

#### **Response – Air Monitoring**

The Los Angeles Department of Regional Planning used ambient air quality monitoring data available from the South Coast Air Quality Management District (SCAQMD) in the analysis presented in the Draft EIR for the Proposed Project. The air monitoring stations and data selected for use in the air quality impact analysis are described in the revised air quality chapter of the Partially Recirculated Draft EIR. These stations and the reported data were deemed adequate to support the air quality impact analysis for the following reasons: (1) the data for each pollutant of concern were collected at the closest available approved monitoring station in the Proposed Project vicinity, (2) the monitored results provide information on pollutants as deemed necessary by the air agencies with jurisdiction, and (3) the monitoring stations are part of the statewide network, maintained and operated by the local air quality regulatory agency, SCAQMD, according to very strict protocols.

SCAQMD continuously operates a network of ambient air quality monitors in the Los Angeles basin, including several locations near the landfill. The air monitoring stations monitor for the pollutants that the state and local air quality agencies consider to be pollutants of concern, and the stations are operated according to strict protocols for sampling, analysis, and data validation and reporting. As described in Section 11.3.3.2, the Partially Recirculated Draft EIR used 6 years of validated ambient air monitoring and meteorological data (2009 to 2014) from the closest SCAQMD-operated monitoring stations in Santa Clarita, Reseda, and Burbank to characterize existing ambient air quality and meteorological conditions in the study area. In addition, as described in Section 11.5.2, the Partially Recirculated Draft EIR used 3 years of measurements from CCL-operated wind monitoring equipment at

the western boundary of CCL to characterize local wind patterns in the study area, specifically to evaluate the potential for offsite odors.

The data selected for use in the health risk analysis are described in the revised air quality chapter and Appendix H of the Partially Recirculated Draft EIR. Results of sampling and chemical analysis of landfill gas (LFG) at the flare inlet and outlet were used to estimate the fugitive LFG and combustion-related emissions used in the study, including methane, ammonia, vinyl chloride, hydrogen sulfide, diesel particulate matter, and 14 other chemicals detected in testing (Appendix H, Table H-2).

Section 2.2.8.7, Air and Landfill Gas Monitoring, of the Partially Recirculated Draft EIR Project Description chapter, provides a detailed discussion of landfill gas monitoring. Specifically, this section states: "Title 27 requires all landfills to have an approved LFG monitoring plan that includes multi-level LFG monitoring probes around the site boundary. CCL has a Title 27 LFG monitoring plan approved by the Lead Enforcement Agency and California Department of Resources Recycling and Recovery. Monitoring is performed in a manner consistent with this Title 27 LFG monitoring plan."

Section 2.2.8.7, Air and Landfill Gas Monitoring, of the Partially Recirculated Draft EIR Project Description, also specifies that, "Monitoring consists of:

- Monthly instantaneous landfill surface monitoring to evaluate potential emissions on the landfill surfaces
- Quarterly integrated landfill surface monitoring to evaluate potential emissions on the landfill surfaces
- Ambient air sampling at the landfill site boundaries to evaluate the potential offsite migration of landfill emissions
- Quarterly and annual reporting to present the results of the preceding activities to the SCAQMD for review".

Additionally, "The monitoring program is designed for CCL to identify surface emissions of LFG at the earliest possible moment." Figure 2-9 of the Partially Recirculated Draft EIR shows the location of existing and proposed LFG monitoring probes. Because monitoring is performed consistent with regulatory requirements, there is no requirement or need for offsite gas probes to be installed.

For additional information on all the types of monitoring conducted for the facility, commenters are referred to Topical Response #10, Environmental Monitoring.

### **Response – Health Effects from Pollutants in Ambient Air under Existing Conditions**

The revised air quality chapter of the Partially Recirculated Draft EIR presents the maximum monitored concentrations of criteria pollutants in ambient air in Table 11-3 of the air quality chapter, as measured at SCAQMD-approved monitoring stations. Table 11-3 also notes the number of times the applicable standards have been exceeded each year from 2009 to 2014. Maximum monitored values can be compared to the applicable air quality standards listed in Table 11-5 of the air quality chapter to evaluate the extent to which the standards have been exceeded. The potential health effects of exposure to particulate matter less than 2.5 or 10 micrometers in aerodynamic diameter (PM<sub>2.5</sub>/PM<sub>10</sub>) and other criteria pollutants in ambient air are described in Chapter 11, Section 11.3.3.2, Air Monitoring Data.

## **1b. Applicable Requirements and Regulatory Setting**

### **Summary of Comments**

Commenters requested updated information on compliance with recent plans and laws, such as CARB's May 2014 Climate Change Scoping Plan Update, Assembly Bill (AB) 1826 organic waste recycling

requirements, and AB 1594 reduction, recycling, and composting requirements. Many of the comments and questions requested clarification and expansion of the discussion regarding SCAQMD plans, rules, permits, and regulations applicable to the Proposed Project.

### **Response**

The revised air quality chapter of the Partially Recirculated Draft EIR was updated to reflect the applicable requirements of the CARB AB 32 Climate Change Scoping Plan Update, AB 1826 organic waste recycling requirements, and AB 1594 reduction, recycling, and composting requirements.

The Original Draft EIR Chapter 11, Air Quality, and Chapter 11, Air Quality, Section 11.4, of the Partially Recirculated Draft EIR analyze and document the federal, state, and SCAQMD plans, rules, and regulations applicable to the Proposed Project. As stated, general conformity is not applicable to the Proposed Project, because the General Conformity Rule only applies to federal actions, and there is no federal action associated with the Proposed Project. The CEQA does not require analysis of plans, rules, or regulations applicable under the baseline, existing permitted conditions, only those applicable to the Proposed Project. For information on requirements applicable to the existing landfill operations, the Title V permit issued for the facility by SCAQMD documents all applicable and enforceable regulatory air quality requirements, and lists all the permit conditions for existing sources and operations. Monitoring reports documenting the results of all required compliance monitoring are submitted biannually to SCAQMD, and compliance is certified annually by the CCL staff acting as the Responsible Party for the Title V facility.

The Proposed Project would include waste collection and haul trucks not owned or operated by CCL. The fleet owners and operators would be responsible for the compliance of these trucks with applicable SCAQMD and CARB standards. The Proposed Project would continue ongoing compliance with existing, applicable rules and permit conditions, and would comply with future requirements that become applicable to the Proposed Project, for example, the facility would prepare and implement fugitive dust plans as required under SCAQMD Rule 403.

## **1c. Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions**

### **Summary of Comments**

Commenters requested information on the emissions sources associated with the Proposed Project and the emission calculation methodology used to estimate emissions associated with construction and operation of the Proposed Project.

### **Response – Emission Sources**

The revised air quality chapter and Appendix H of the Partially Recirculated Draft EIR analyze and document the sources, emissions, and air quality and health risk impacts associated with the Proposed Project, including tailpipe and fugitive emissions from construction, offsite waste haul truck travel, flare operations, fugitive LFG, grading, composting, and landfill operations. Emissions were not calculated for the LFG-to-energy plant, because operations associated with this facility were assumed to be included with existing conditions and would not change with the Proposed Project. The LFG-to-energy plant would continue operation with or without the Proposed Project.

Emissions associated with construction and operational sources and the extent, duration, and phasing of construction of the Proposed Project have been discussed in the revised air quality chapter and Appendix H of the Partially Recirculated Draft EIR. Appendix H provides information on the assumed vehicle miles travelled values and emissions factors used in emissions estimation for the haul trucks and

other mobile sources. The tools used to estimate emissions from mobile sources use emission factors developed for existing and future vehicle fleets, based on federal, state, and local regulatory requirements and surveys of regional fleets conducted by CARB. Construction and operations emissions estimated for the Proposed Project have been combined and conservatively compared to SCAQMD operational Significance Thresholds.

### **Response – Methods Used to Calculate Emissions**

The revised air quality chapter and Appendix H of the Partially Recirculated Draft EIR have been updated to provide information on the methodologies used and the results obtained through emission estimation, dispersion modeling, and health risk assessment, including the assumptions regarding potential daily maximum emissions and their frequency. The methods and models used in the dispersion modeling and health risk assessment are discussed in more detail in Topical Responses #1d and #1e, respectively.

## **1d. Methods and Models Used in Air Dispersion Modeling, and Impacts to Surrounding Neighborhoods**

### **Summary of Comments**

Comments were received regarding the methods and models used in air dispersion modeling, and their adequacy and accuracy to predict potential air quality impacts. Commenters requested detailed analysis and dispersion modeling to further analyze impacts associated with particulate matter from the proposed mixed organics composting facility. Commenters also requested additional analysis of impacts associated with the prevailing wind patterns and the proposed increases in landfill elevation on existing and future receptors in surrounding neighborhoods.

One commenter requested that nitrous oxide (NO<sub>x</sub>), sulfur dioxide, and carbon (CO) modeled results should be further evaluated by incorporating the analysis of at least one additional air dispersion model. The commenter believes that all dispersion modeling systems are conservative, and further analysis would provide results more representative of the actual impacts of the landfill. The commenter requests information on the maximum emissions levels used in the analyses, including the frequency of maximum emissions on a daily and annual basis.

### **Response**

The Los Angeles Department of Regional Planning used available and SCAQMD-approved ambient air quality monitoring and meteorological data in the dispersion modeling analysis presented in Chapter 11 of the Partially Recirculated Draft EIR for the Proposed Project. The monitoring and meteorological data, including wind data, are described in more detail in Topical Response #1a and Chapter 11 of the Partially Recirculated Draft EIR. The dispersion modeling was performed using approved and recommended South Coast Air Quality Management District dispersion modeling guidance and the U.S. Environmental Protection Agency-approved dispersion model, AERMOD, to predict the potential impacts associated with the Proposed Project.

At the request of the SCAQMD, impacts that would be associated with construction and operation of the Proposed Project were evaluated based on the estimated and combined construction- and operation-related emissions, including emissions from composting (Topical Response #1c). Information on predicted maximum emissions levels and the project years with highest potential emissions was developed. The daily emission rates estimated for each of the pollutants in their worst-case year were conservatively compared to the daily mass emission operations thresholds established as CEQA significance criteria by SCAQMD.

The combined worst-case daily construction and operation emissions for the Proposed Project would exceed the SCAQMD daily operational thresholds for NO<sub>x</sub>, reactive organic gas (ROG), PM<sub>10</sub>, and PM<sub>2.5</sub>. These estimated increases in maximum daily emissions represent worst-case daily emission estimates, given the conservative approach of combining operation and construction emission estimates for the highest emission year to determine maximum daily emissions, and the variability of facility operation and construction activities on a day-to-day basis. Days when construction activities would not occur would result in lower emissions.

The potential impacts associated with the combined construction and operational emissions from onsite sources for the Proposed Project were analyzed using the AERMOD dispersion modeling system. Proposed increases in landfill elevation were included in the model inputs. Results of the modeling were added to representative background levels and compared to the ambient air quality concentrations recommended as significance thresholds, which include both SCAQMD Localized Significance Thresholds (LST) and some of the federal and state ambient air quality standards.

Consistent with the SCAQMD LST methodology, the potential impacts from the combined worst-case construction and operation emissions from onsite sources for the Proposed Project were evaluated for the nearest receptor locations. Modeled results for combined worst-case onsite construction and operation emissions, background levels, and total predicted concentrations, were compared to the applicable ambient air quality thresholds. PM<sub>2.5</sub> and PM<sub>10</sub> concentrations would be above the LSTs for each of the applicable averaging periods. Concentrations of all other pollutants would be below the ambient standards listed as significance thresholds.

In summary, daily emissions of NO<sub>x</sub>, ROG, PM<sub>10</sub>, and PM<sub>2.5</sub> from construction and operation would exceed the SCAQMD mass daily operational thresholds, and modeled ambient concentrations resulting from the project-related emissions of PM<sub>10</sub> and PM<sub>2.5</sub> would exceed the applicable LSTs. On this basis, air quality impacts associated with combined emissions from construction and operation of the Proposed Project would be significant, and additional mitigation measures were evaluated for their feasibility of implementation. With additional mitigation, impacts from construction and operation of the Proposed Project would be reduced, but would remain potentially significant and unavoidable.

Localized impacts due to CO emissions from the Proposed Project were assessed using the SCAQMD-recommended California LINE Source Dispersion Model, Version 4. The CO hotspot modeling was performed according to the methodology outlined in the University of California, Davis *Transportation Project-Level Carbon Monoxide Protocol* (Niemeier, Eisinger, Kear, Chang, & Meng, 1997), which is accepted by SCAQMD for CEQA analysis.<sup>1</sup> Maximum 1-hour and maximum 8-hour CO concentrations were estimated for comparison to the national and state 1-hour and 8-hour standards. Results of the CO hotspot analysis are presented in Section 11.6.3.2, and indicate that the Proposed Project would not cause an exceedance of the CO ambient air standards.

Section 11.9 of the Partially Recirculated Draft EIR Air Quality chapter presents the results of an assessment of the potential for cumulative impacts resulting from operation and construction of the Proposed Project in conjunction with emissions from other reasonably foreseeable projects in the area. The additional foreseeable projects consisted of 13 residential developments, three commercial developments, five industrial developments, and one transportation improvement project. Additional receptors were placed in areas of future development to evaluate potential cumulative air quality impacts for the future developments including schools, residences, and businesses. Project Design Measures and mitigation measures to reduce potential significant impacts on air quality due to

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<sup>1</sup> The California Department of Transportation CO hotspot protocol covers the hot spot analysis process for conformity in California and is accepted for CO analysis by SCAQMD.

emissions from the Proposed Project were identified. Additional control measures for the other proposed projects in the area may be included and incorporated within their project-specific implementation plans. Most of the emissions generated from other nearby projects would be from increases in associated passenger and commercial vehicle traffic, and from off-road construction equipment used to build the developments. The overall cumulative impact from construction and operational activities would be significant and unavoidable for NO<sub>x</sub>, ROG, PM<sub>10</sub>, and PM<sub>2.5</sub>.

## **1e. Methods and Models Used in Health Risk Assessment, and Impacts to Surrounding Neighborhoods**

### **Summary of Comments**

Comments were received regarding the methods and models used in the health risk analysis, and their adequacy and accuracy to predict health risks and protect public health. Commenters requested additional school notification and further analysis of the potential for health risk impacts at area schools and residences in surrounding neighborhoods, both existing and future. Commenters requested that the analysis also include diesel truck emissions from the increase in waste disposal trucks which would enter and exit the site, emitting diesel particulate matter.

One commenter indicated that the analysis years of 2016, 2021, and 2032 do not adequately evaluate the cancer risk associated with a lifetime of exposure from living in the vicinity of the landfill. The commenter opines that the document incorrectly defines the significance of the Proposed Project when compared to SCAQMD thresholds, both as a result of incomplete analysis and limitations of the models used in the analysis. Voicing concerns that risks for the Proposed Project are underestimated, the commenter refers to a preliminary environmental analysis prepared in 2005 by graduate students at University of California Irvine, which predicted higher health risks for a hypothetical landfill expansion project. Other studies were also provided regarding the effects of air pollution on public health and children's' health.

### **Response**

The Los Angeles Department of Regional Planning used approved and recommended SCAQMD modeling guidance and risk assessment guidance from the California Office of Environmental Health Hazard Assessment (OEHHA) to predict the potential health risk impacts associated with the Proposed Project. Both the 2003 OEHHA guidance and the 2015 OEHHA guidance documents were used, because the Original Draft EIR utilized the 2003 OEHHA guidance and the guidance has been updated since that time. Chapter 11 and Appendix H of the Partially Recirculated Draft EIR describe the sources, toxic air contaminant emissions estimates, receptor locations, and potential health risk impacts predicted for the Proposed Project. The health risk assessment evaluated potential exposures to emissions from construction, offsite waste haul truck travel, flare operations, fugitive LFG, grading, composting, and landfill operations over the 30-year lifetime of the Proposed Project.

The revised air quality chapter and Appendix H of the Partially Recirculated Draft EIR have been updated to provide information on the methodologies used and the results obtained through emission estimation, dispersion modeling, and health risk assessment, including the assumptions regarding exposure durations and potential health hazards. Evaluation of existing emissions, ambient concentrations, and health impacts is not within the scope of this analysis, therefore only incremental impacts have been evaluated. Health risks have been estimated for chronic and acute exposures to combined construction and operations emissions estimated for the Proposed Project, and results have been compared to SCAQMD Significance Thresholds.

Results indicate that the Proposed Project would result in carcinogenic, chronic, and acute health risks that would be less than significant, compared to SCAQMD significance criteria. Existing and proposed locations of sensitive receptors, such as schools and childcare facilities, were included in the health risk assessment, in accordance with SCAQMD and OEHHA guidance. The Notice of Availability of the DEIR was sent to both the Castaic Union School District and the Hart Union School District.

Health risks have been estimated in a conservative manner which may substantially overstate the risks associated with the Proposed Project. The actual risks associated with the Proposed Project are expected to be less than those presented in the Partially Recirculated DEIR. Based on the findings of the Original Draft EIR, Chapter 11, Air Quality, as well as the Air Quality Supplement included in the Partially Recirculated Draft EIR, the Proposed Project would not result in significant health risk impacts.

Section 11.9.2.3 of the Partially Recirculated Draft EIR presents the results of health risk assessment for potential cumulative impacts resulting from human exposures to emissions from operation and construction of the Proposed Project in conjunction with emissions from other reasonably foreseeable projects in the area. As indicated in Topical Response #1d, the additional foreseeable projects consisted of 13 residential developments, three commercial developments, five industrial developments, and one transportation improvement project. Additional receptors were placed in areas of future development to evaluate potential cumulative air quality impacts for the future developments including schools, residences, and businesses. Project Design Measures and mitigation measures to reduce emissions from the CCL Proposed Project were identified. Additional control measures for the other proposed projects in the area may be included and incorporated within their project-specific implementation plans. Most of the emissions generated from other nearby projects would be from increases in associated passenger and commercial vehicle traffic, and from off-road construction equipment used to build the developments.

The proposed additional development in the area would not only increase the emissions of TACs generated in the area, but would also add new residential, commercial, and sensitive receptors. The emissions and impacts would, for the most part, be localized around each respective project. Using the 2015 OEHHA guidance, cumulative projects plus the Proposed Project would increase cancer risk by more than the 10 in 1 million threshold for residences, workers, and sensitive receptors near the Proposed Project site, indicating a significant cumulative impact.

Please also refer to Topical Response #21, Public Health, which provides responses to comments regarding the health risk assessment provided in the revised air quality chapter of the Partially Recirculated Draft EIR; the potential for additional health risks in the surrounding community; and the uncertainties associated with attribution of symptoms and adverse effects to project emissions.

## **1f. Methods Used in Evaluating Odor Impacts, Methods for Odor Mitigation, and Odor Impacts to Surrounding Neighborhoods**

Odor impacts, BMPs, and mitigation measures are described in detail in Chapter 11 of the Partially Recirculated Draft EIR. See Topical Response #17 for a complete response to comments received related to Odor.

## **1g. Enforcement of Mitigation Requirements**

### **Summary of Comments**

Commenters requested a description of how BMPs and emissions limits would be enforced for the Proposed Project.

## Response

Chapter 11, and Appendix H of the Air Quality Supplement included in the Partially Recirculated Draft EIR analyze and document all the sources, emissions, and air quality and health risk impacts associated with the Proposed Project. Combined construction and operations emissions estimated for the Proposed Project are compared to SCAQMD Significance Thresholds. To address air quality significant impacts associated with the Proposed Project, a Mitigation, Monitoring, and Reporting plan (MMRP) would be implemented and enforced by the lead agency, the Los Angeles County Department of Regional Planning, as part of the Conditional Use Permit. For requirements applicable to the existing landfill operations, the Title V permit issued for the facility by SCAQMD documents all applicable and enforceable regulatory air quality requirements, and lists all the permit conditions for existing sources and operations. Monitoring reports documenting the results of all required compliance monitoring are submitted biannually to the SCAQMD, and compliance is certified annually by the Responsible Party for the Title V facility. The Proposed Project would continue ongoing compliance with existing, applicable rules and permit conditions, and would comply with future requirements that become applicable to the Proposed Project. For example, the facility would update the Title V permit as requirements change or emission sources are added or modified, and would prepare and implement fugitive dust plans as required under SCAQMD Rule 403.

The MMRP, included in the Final EIR, is a tool to aid in compliance with the design features, best management practices, and mitigation measures described in the EIR for the Proposed Project. Each measure listed includes one or more actions required. For each of these actions, the MMRP identifies mitigation timing, responsible party, and monitoring agency or party. The Los Angeles County Department of Regional Planning is the Lead Agency for enforcing compliance with the MMRP.

# CCL Topical Responses

## 2. Biological Resources

Comments regarding biological resources were primarily received from the California Department of Fish and Wildlife (CDFW). Subsequent to the release of the July 2014 Original Draft Environmental Impact Report (EIR), additional investigations of biological resources at Chiquita Canyon Landfill (CCL) were undertaken, and the Biological Resources chapter of the November 2016 Partially Recirculated Draft EIR was revised and updated to reflect the results of those additional investigations.

This Topical Response primarily serves to summarize the revisions and updates to the Biological Resources chapter between the Original Draft EIR and the Partially Recirculated Draft EIR.

### **Vegetation Mapping and Identification of Additional Vegetation Alliances**

The Original Draft EIR identified 13 vegetation communities or land cover types at CCL, and the Biological Resources chapter of the Original Draft EIR identified potential impacts of the Proposed Project on these vegetation communities. Mitigation, in particular Mitigation Measure BR-1, was identified to reduce potential impacts.

In support of Mitigation Measure BR-1, which specifies the development and implementation of a Closure Revegetation Plan, additional vegetation mapping and sampling was conducted at CCL in February and March 2016, as documented in the revised Chapter 8, Biological Resources, of the Partially Recirculated Draft EIR. After preliminary mapping was complete, transects were established in native shrub and herbaceous alliances. Once a transect was established, vegetation composition by species and/or ground cover was documented at 0.1-foot precision. Data were recorded and analyzed to include absolute cover by species, relative cover by species, percent shrub cover, percent weed and invasive weed cover, and total vegetative cover. Upon completion of the transect data analysis alliance mapping was reevaluated to ensure that ocular estimates conducted to provide preliminary mapping accurately characterized alliances when compared with transect data. Some alliances were recoded and/or alliance boundaries were adjusted based on transect data.

This detailed vegetation mapping resulted in a more finely-defined set of vegetation alliances at CCL, specifically, in the identification of the following land covers and vegetation alliances:

- Two developed land covers (active landfill, roads, and infrastructure, and ornamental)
- Fourteen natural alliances and land cover, including one herbaceous alliance, 11 shrubland alliances, bare rock, and one forest alliance)
- Three semi-natural alliances, including two herbaceous alliances, and one shrubland alliance
- Four revegetated alliances, made up of shrubland alliances

Each of these land covers and alliances are described in detail in the revised Chapter 8, Biological Resources, of the Partially Recirculated Draft EIR. Mitigation Measure BR-1 was revised to reflect the refinement of vegetation alliances at CCL, and Appendix E3, Draft Revegetation, Rare Plant Relocation, and Oak Tree Performance Criteria, was developed to identify revegetation objectives and performance criteria that would guide revegetation of impacted native, semi-natural, and revegetated areas disturbed by the Proposed Project.

### **Rare Plant Surveys**

The Original Draft EIR acknowledged the potential for rare plant communities at CCL and the potential for the Proposed Project to result in impacts to these communities at CCL. Mitigation was proposed to address potential impacts to rare plant communities.

Rare plant surveys of native, naturalized, and revegetated habitats at CCL were conducted in April and July, 2016. Surveys were floristic in nature, and followed standard survey protocol for rare plants outlined in Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants (USFWS, 1996) and/or Protocols for Surveying and Evaluation Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 2009). Field surveys were conducted in a manner which maximized the likelihood of locating special-status plant species, as defined in the Biological Resources chapter. However, surveys were not limited to these species, but included any potential special-status plant species. Surveys were conducted in April and again in July representing times of the year when species were both evident and identifiable.

The results of the rare plant surveys were incorporated into Chapter 8, Section 8.6.3.4, Potential Impacts to Special-Status Plant Species, of the Partially Recirculated Draft EIR. Rare plants identified at CCL during rare plant surveys in 2016 included club-haired Mariposa lily, slender Mariposa lily, and hybrids between these two subspecies: Pierson's morning-glory, California sunflower, narrowleaf Stillingea, and beavertail cactus.

Mitigation Measure BR-9, which addresses rare plants, was refined to reflect special-status and rare plants which are known to occur, or which may have the potential to occur, at CCL. Mitigation Measure BR-9 now includes development and implementation of a Rare Plant Relocation Plan, which would be developed in consultation with the CDFW. Appendix E3 of the Partially Recirculated Draft EIR includes performance criteria for rare plant relocation.

### **Western Spadefoot**

During vegetation surveys conducted at CCL, western spadefoot was positively identified in the east stormwater detention basin. As a result, Mitigation Measure BR-10 was revised and expanded to include protection for western spadefoot during construction-related activities. Specifically, preconstruction ground surveys for western spadefoot are to be conducted within 1,000 feet of the sedimentation basins at CCL, if ground-disturbing activities will be conducted within 1,000 feet of the basins. Any western spadefoot encountered would be relocated to intact habitat. In addition, Mitigation Measure BR-16 was added to avoid operational impacts to western spadefoot that may occur during draining of the stormwater detention basins or sediment removal from the stormwater detention basins (both activities are required to maintain stormwater capacity for CCL).

# CCL Topical Responses

## 3. Composting Facility and Conversion Technology

### Summary of Comments

Comments were received requesting that in-depth discussions and analyses be provided for the mixed organics processing/composting operation and conversion technologies in conjunction with the full and/or partial development of the landfill expansion. Preparation and submittal of an Odor Impact Minimization Plan (OIMP) to the appropriate Local Enforcement Agency (LEA) and to Los Angeles County Department of Public Health for review and approval was requested. Additional analysis regarding any potential impacts associated with the operation of the mixed organics processing/composting operation, including mitigation measures if found to have a significant impact, was requested. One commenter asked how the landfill will guarantee that compost will be reliably available to the community and landscape growers in the future at a reasonable cost. Commenters also requested clarification on the hours of operation for the mixed organics processing/composting facility and requirements for continued operation of a mixed organics processing/composting facility.

### Response

#### Composting Facility

##### Potential Operating System

The Chiquita Canyon Landfill (CCL) Master Plan Revision (Proposed Project) is an expansion of an existing Class III solid waste municipal landfill. Mixed organics processing/composting activities are ancillary to the Proposed Project and are discussed in the Partially Recirculated Draft Environmental Impact Report (EIR) Chapter 2, Project Description, Section 2.2.10, Mixed Organics Composting Facility.

A green waste processing and composting operation at CCL is permitted by the current Conditional Use Permit (CUP) until 2027. CCL operated a green waste composting facility until 2009, when that activity ceased as a result of decreased demand. A green waste processing and composting operation is permitted by the CUP, but not required.

The green waste composting facility is permitted under the current CUP to receive up to 560 tons per day. The feedstock for the green waste composting operation under the current CUP is limited to shredded green waste, and prohibits waste water biosolids (sludge). In addition to shredded green waste, the Proposed Project would also include pre- and postconsumer food waste as part of a mixed organics processing/composting process and may also include a “static pile system”. Sludge would not be accepted as part of the mixed organics processing/composting facility. The mixed organics processing/composting project may also include green waste and food processing and shipping of process material to an offsite composting operation.

The mixed organics processing/composting operation is a mobile activity that will move within the landfill during the life of the Proposed Project. The mixed organics processing/composting facility would be up to 41 acres and located within the existing and future landfill footprint, including the Primary Canyon and Canyon B. Based on the anticipated construction and operation of the landfill, it is anticipated that the mixed organics processing/composting facility may be constructed and/or relocated at CCL three times during the life of the Proposed Project.

The current CUP allows for either an open “windrow system” as was previously employed, or an “in-vessel system”. Under the windrow system, the green material is ground in a tub grinder (or equivalent) and then formed into windrows. Windrows are turned periodically to add oxygen and water as necessary to maintain the proper moisture content. The composting material is typically kept in the windrows for 30 to 90 days. Odors are controlled by maintaining aerobic conditions in the windrows and by monitoring the windrows for temperature, oxygen content, and moisture on a daily basis. When the desired level of composting has been achieved, the compost material is moved to the curing area and formed into curing piles. The cured compost is screened to remove any large particles. The finished product is then transported offsite for sale or used onsite for erosion control.

With the addition of food waste, the open air green waste windrow composting system may be converted to an aerated static pile (ASP) composting system that can accept blended amounts of food waste with the green waste. The ASP composting system would offer process control for rapid biodegradation, and be suitable for processing wet materials and large volumes of feedstocks.

Whether a windrow system, in-vessel, or static pile system is used, mixed organics processing/composting activities will comply with applicable federal, state, and local regulatory requirements and be reviewed and monitored by the Los Angeles County Department of Public Health (LEA), prior to implementation.

#### Availability of Compost to the Community

Overall, market conditions dictate the quantity of feedstock that will be delivered to the site (and therefore the resulting compost product). Thus the availability of compost to the general public may fluctuate depending on the variability of market conditions.

The prior and presumed future mixed organics processing/composting operation at CCL is ancillary to the primary function of the landfill. There is no obligation by CCL or Los Angeles County to ensure that reasonable-cost compost be available to the community and landscape growers as a result of the Proposed Project.

#### Regulations

As with the landfill operations, composting activities are regulated by federal, state, and local legislation. CCL will continue to comply with the regulations pertaining to both the landfill operations, as well as the composting operations, as enforced by the LEA and California Department of Resources Recycling and Recovery (CalRecycle). Specifically, Title 14, Division 7, Chapter 3.1 of the *California Code of Regulations* (CCR) (Compostable Materials Handling Operations and Facilities Regulatory Requirements) contains detailed regulations pertaining to composting material handling and storage operations and facilities, reporting, siting and design information, operating standards including odor and nuisance controls, training, environmental health standards, record keeping, and site restoration. In addition, pursuant to Title 14 CCR, Chapter 3.1 § 17863.4, all commercial composting facilities in California are required to prepare, implement, and maintain a site-specific OIMP. An OIMP will be prepared for the composting operation for approval by the LEA prior to resuming the composting operation. The South Coast Air Quality Management District (SCAQMD) also cites composting operation standards and required test methods and protocols with Rule 1133.3 Emission Reductions from Greenwaste Composting Operations. Rule 1133.3 also allows for pre- and post-consumer food waste for composting.

In November 2015, the Office of Administrative Law approved proposed revisions to Title 14 Division 7/ Title 27 Division 2 regulations, some of which include the addition of new language regarding anaerobic digestion, feedstock definitions, odors, permitting tiers, etc., at composting facilities. The revised regulations became effective January 1, 2016. The mixed organics processing/composting facility, specifically related to requirements for green material and vegetative food material processing,

sampling, and testing, will be operated in compliance with the revised regulations, as enforced by the LEA. If after operating, the LEA determines odor impacts are occurring, the regulations require that an Odor Best Management Practice Feasibility Report, as specified in Section 17863.4.1, be prepared and implemented upon approval by the LEA.

The State Water Resources Control Board (SWRCB) has also undertaken efforts to establish statewide regulations for composting facilities. SWRCB released the Draft EIR (SCH # 2015012021) and general waste discharge requirements (WDR) for Composting Operations (General Order) for public comment. The comment period for both documents ended on March 2, 2015. The SWRCB certified the EIR and adopted the General Order on August 4, 2015. The WDRs will assist Regional Water Quality Control Boards in the regulation of composting facilities to streamline permitting and protect water quality by defining standards for design, maintenance, and monitoring requirements. The mixed organics processing/composting facility at CCL would comply with adopted WDRs for composting facilities.

#### Hours for Composting Operation

The existing CUP for CCL includes different operating hours for waste disposal than for ancillary activities such as composting. The hourly exclusion for landfill operation does not apply to the composting operation. The current CUP allows the green waste processing/composting facility to operate 24 hours per day, 7 days per week. However, the current CUP specifies that access by customers for purposes of removing finished mulch, biomass fuel and compost shall not occur outside the hours of 6:00 a.m. to 8:00 p.m., 7 days per week. The delivery of feedstock is not subject to this limitation. It is anticipated that the new CUP for the Proposed Project will similarly identify operating hours for the mixed organics processing/composting facility separate from landfill operation.

#### Nuisance Prevention

Currently, CCL diverts green waste from disposal by using it for temporary slope stabilization, erosion control, fugitive dust control, and alternative daily cover. There are no reports of rats as a nuisance at CCL and no evidence that rats use the green waste that is applied as daily cover as a food source. Mitigation measures identified in the Biological Resources chapter for the Original Draft EIR and Partially Recirculated Draft EIR, address nuisance wildlife.

#### **Mixed Organics Composting Facility Analyzed in EIR**

The Original Draft EIR and Partially Recirculated Draft EIR analyzed the Mixed Organics Composting Facility, as summarized below.

#### Surface Water Drainage

As described in the Original Draft EIR Chapter 6, Surface Water Drainage, a diversion berm designed to handle runoff from a 24-hour, 25-year storm will be installed on the up-gradient side of the composting area to divert storm water around the area. In addition, as described in the Partially Recirculated Draft EIR Chapter 2, Project Description, Section 2.2.10, Mixed Organics Composting Facility, stormwater from the composting process will be managed separately onsite from other stormwater flows, as required by current regulations.

#### Air Quality

SCAQMD best management practices (BMP) or best available control technology (BACT) for composting will be reviewed and considered for appropriate composting operations at CCL. During the SCAQMD Rule 1133.3 rulemaking, SCAQMD staff reports indicated that ASP composting was considered a BACT. At that time, available systems were either the Gore cover with positive airflow or ECS-type system with negative air. Since then, a fair amount of work in other air districts has allowed positive air with a finished compost cover as meeting BACT standards. The proposed Tier II (mixed organics) composting

facility operations will be evaluated against current technologies so that appropriate BMPs and BACT are selected and implemented. Tier II feedstocks include food materials (nonvegetative), biosolids (Class A, B, and/or EQ) as defined by 40 *Code of Federal Regulations* part 503, manure, anaerobic digestate derived from allowable Tier II feedstocks; and a combination of allowable Tier I and Tier II feedstocks. Tier I feedstocks include agricultural materials, green materials, paper materials, vegetative food materials, anaerobic digestate derived from allowable Tier I feedstocks.

The Partially Recirculated Draft EIR Chapter 11, Air Quality, included a detailed analysis of the potential air quality impacts associated with the mixed organics processing/composting facility. Specifically, as noted in Table 11-8, Worst-Case Proposed Project Construction and Operation Emissions, total composting operation emissions assume that the compost material includes more than 10 percent food waste.

At a minimum, the Proposed Project would implement Mitigation Measure AQ-4, which includes development of an OIMP prior to operation of the mixed organics processing/composting facility, and compliance with the OIMP during mixed organics processing/compost facility operation. Additionally, the Proposed Project would implement the Composting Emissions Reduction BMPs identified in Table 11-1 of the Partially Recirculated Draft EIR.

#### Traffic

Traffic for the Proposed Project, including the Mixed Organics Composting Facility, is discussed in the Partially Recirculated Draft EIR Chapter 2, Project Description, Section 2.2.6.11, Traffic. As shown in Table 2-3, for the peak Proposed Project, which is the sum of baseline trucks plus the proposed vehicle increase for a peak day, a total of 975 inbound material trucks trips would occur. These inbound material truck trips account for traffic associated with waste to be disposed, mixed organics compost material, and beneficial use material. These vehicles are included in the detailed analysis of traffic for the Proposed Project, included in Chapter 10, Traffic and Transportation, of the Original Draft EIR. The Traffic and Transportation analysis concluded that potential traffic impacts for the Proposed Project would be less than significant.

#### **Conversion Technology**

As described in Chapter 2, Project Description, of the Partially Recirculated Draft EIR, CCL has included a set-aside portion of the site within the existing CCL property boundary that could be used for a potential future conversion facility. The Proposed Project does not include design, permitting, construction or operation of a conversion facility. Therefore, these activities do not warrant a full/expanded discussion in the EIR. However, to assist in the siting and permitting of anaerobic digestion facilities in California, CalRecycle prepared a Program EIR (SCH# 2010042100) for Statewide Anaerobic Digester Facilities for the Treatment of Municipal Organic Solid Waste. The Final Program EIR and associated background and guidance documents can be found on the CalRecycle website:

<http://calrecycle.ca.gov/SWFacilities/Compostables/AnaerobicDig/default.htm#EIR>.

Chapter 2, Project Description, Section 2.2.11, Land Set-Aside for Potential Future Conversion Technology Facility, of the Partially Recirculated Draft EIR, provides a summary of the findings and recommended mitigation measures contained in the Program EIR. The Program EIR determined that on a program-level all the impacts of anaerobic digestion facilities could be mitigated to a less-than-significant level with implementation of the recommended mitigation measures. Individual projects, such as the potential facility at CCL, would be analyzed in a tiered CEQA document, prior to construction of such facility. At that time, all potential impacts and site-specific measures would be identified and analyzed.

# CCL Topical Responses

## 4. Conditional Use Permit Compliance

### Summary of Comments

Several comments were made regarding Chiquita Canyon Landfill's (CCL) compliance with the existing Conditional Use Permit (CUP), and the ability of regulatory agencies to protect the community from potential future CUP violations. Specifically, commenters suggested that the landfill has operated in the evenings and on Saturdays in violation of the CUP. Commenters also expressed concern over a sludge violation and a claim that CCL took in radioactive waste, thus violating the CUP. Commenters asked how Los Angeles County will protect the community from possible future violations by CCL.

### Response

#### Responsibility for Compliance Monitoring

Responsibility for monitoring compliance with the CUP issued to CCL resides with the Los Angeles County Department of Regional Planning (LADRP). In addition to CUP compliance monitoring conducted by LADRP, a number of other agencies monitor the landfill's compliance with other permits and requirements, including the:

- Los Angeles County Department of Public Health (Local Enforcement Agency)/California Department of Resources Recycling and Recovery
- Regional Water Quality Control Board, Los Angeles Region
- Los Angeles County Department of Public Works
- South Coast Air Quality Management District

CCL currently complies with its CUP, as enforced by LADRP. If the Chiquita Canyon Landfill Master Plan Revision (Proposed Project) is approved, CCL would be required to comply with its new CUP, including mitigation measures and conditions, again as enforced by LADRP.

See Topical Response #10 for additional discussion of Environmental Monitoring.

#### Operating Hours

CCL complies with the permitted operating hours in the existing CUP. Operating hours under the existing CUP for CCL are as follows:

- Condition 9h of CUP No. 89-081(5) states: "Operating hours may be 24 hours per day, 7 days per week, except that, other than as provided in Condition 20i, the landfill shall not accept refuse for disposal from 5:00 p.m. on Saturdays through 4:00 a.m. on Mondays. Maintenance activities may occur during these times" The 24-hour operation of the landfill was also confirmed by the Board of Supervisors (BOS) in their 1997 findings.
- Condition 20i of CUP No. 89-081(5) states: "The landfill operator shall provide four free quarterly clean-up days to residents of Val Verde, showing proper identification and proof of residence at the landfill entrance. These days may be Sundays."

## Sludge

Sludge, as defined by Title 27 of the California Code of Regulations, is an allowable material at a Class III Solid Waste Landfill, but it is not allowed by the current CUP for CCL. Up until 1997, sludge was accepted for disposal at CCL and was specifically allowed by the prior CUP. Even though there was no identifiable environmental impact associated with taking sludge, for the current CUP, CCL agreed to remove sludge from the list of allowable waste materials, and the current use permit reflects this.

CCL received a Notice of Violation for accepting sludge on August 28, 2012, from LADRP. The "sludge" in question accepted by CCL was the dry waste product generated by filtering potable water to drinking water standards. The material has incorrectly been referred to by others as "sludge," although it is not sludge and is not a liquid waste. Sludge can be defined by either its consistency or by its source. The waste material at issue, residue from the treatment process for potable drinking water, is not sludge due to its consistency. It is a dry, inert solid waste. It is not a liquid or semi-liquid waste, nor is it material associated with waste water (sewage) treatment in any way.

Condition 9a of CUP 89-081(5) is a general prohibition related to accepting liquid waste/material at the landfill:

- 9a. Liquid or hazardous waste or radioactive waste/material shall not be accepted. Should such prohibited waste be nevertheless received at the landfill, it shall be handled and disposed of as provided in Condition 26. The term "liquid waste" as used herein includes non-hazardous sludges meeting the requirements contained in Title 23, Chapter 15 of the California Code of Regulations for disposal in a Class III landfill. The landfill shall not accept sludge or sludge components at any time.

The potable water treatment inert waste material (that was accepted) is dry. Therefore, it is not a liquid waste by definition. Since it is not a liquid waste, the general application of Condition 9a for liquid waste contained in Condition 9a is not applicable and has no relevance to the potable water treatment material. With regard to classifying the potable water treatment residue as sludge because of its source, it is clear from the documents considered by the BOS in issuing the prior CUP in 1997 that the BOS's expressed intent was to prohibit the acceptance of wastewater sludge or biosolids by the landfill or the composting operation. In fact, in Condition 12, the permit makes it clear that the issue is the prohibition on receipt of wastewater biosolids. The Final Environmental Impact Report (EIR) for the previous expansion project noted on page VI-I-a list of limitations that Laidlaw (the landfill owner at that time) had agreed to. Item #5 on Page VI-2 states, "Wastewater biosolids, known as "sewage sludge" and currently accepted at the landfill, are prohibited from the landfill and from the composting facility." This prohibition is what was included in Conditions 9 and 12. The only reference to "sludge" in the FEIR, Section VI is to wastewater biosolids.

Furthermore, the findings of the BOS and the Order dated May 9, 1997, also supports the limitations by the CUP in response to concerns about wastewater treatment sludge. BOS Finding No. 3 states the landfill receives sewer sludge. BOS Finding No. 6 provides that wastewater biosolids (sludge or sludge components) will be prohibited from the composting operation.

Despite the above clarifications, CCL voluntarily stopped accepting the inert water treatment waste material in response to the Notice of Violation. LADRP considers the issue to be resolved and closed the Notice of Violation subsequently.

As stated in Chapter 2, Project Description, of the Partially Recirculated Draft EIR, the Proposed Project excludes acceptance of sludge.

See Topical Response #29a for a discussion of Wastes to be Received.

**Radioactive Waste**

CCL is prohibited by Title 27 and by the CUP from taking radioactive waste and has radiation detectors at the site entrance. CCL confirms that it has never accepted radioactive waste for disposal. The radiation detectors screen all incoming loads for the presence of radioactive material. See Topical Response #29a for a discussion of Wastes to be Received. LADRP does not have any information that supports the claim that CCL has accepted radioactive waste for disposal.

# CCL Topical Responses

## 5. Conditional Use Permit and Community Agreement

### Summary of Comments

A number of commenters stated that Val Verde and the Chiquita Canyon Landfill (CCL) signed a legal agreement in 1997 stating that the landfill would close when the total capacity of the landfill reached 23 million tons or on November 24, 2019, whichever came first. Commenters stated their belief that it was “guaranteed” that the landfill would close by 2019. It was suggested that the “agreement” or “contract” will be breached if the expansion is approved and that an extension of the landfill should be put on hold until the community and landfill come to agreement regarding the “agreement.”

### Response

The “agreement” or “written agreement” or “1997 agreement” referred to by several commenters is most comprehensively attached to Original Draft Environmental Impact Report Comment Letter #9 (“Statement of Agreements and Understanding By and Between Newhall Land and Farming Co., Laidlaw Waste Systems [Chiquita], Inc., Val Verde Civic Association” [Agreement]). The Agreement identifies various agreements between the parties referenced above, including Val Verde Community Benefits Funds permitted expenditures and payment schedule, and Proposed Modifications to Conditional Use Permit 89 081-(CUP) Conditions of Approval and Monitoring Program (Attachment C to the Agreement).

The Agreement is between the community and the landfill operator/owner; Los Angeles County is not a party. However, a major focus of the agreement was to insert certain agreed-to conditions into Los Angeles County’s CUP. The County did include certain new conditions as part of the final CUP approval by the Board of Supervisors, as described below.

Attachment C to the Agreement includes specific conditions that were proposed to be added to the existing CUP (No. 89-081[5]), and those conditions were added consistent with the terms of the Agreement. The specific conditions related to landfill closure are listed below:

- #9g Nothing in this condition shall permit the maximum landfill capacity of 23 million tons to be increased.
- #46<sup>1</sup> The maximum total capacity of the landfill shall be 23 million tons. Landfill closure shall occur when this capacity is reached, or by November 24, 2019, whichever occurs first.

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<sup>1</sup> CCL reached the 23-million-ton overall disposal limit described in CUP Condition No. 46 in July 2016. Prior to that date, CCL requested and received a limited operational waiver issued by LADRP, pursuant to Los Angeles County Code Section 22.04.110, which became effective in July 2016. The waiver was supported by an Approved Addendum to the Final Environmental Impact Report prepared pursuant to *California Environmental Quality Act* Guidelines Section 15164 which discloses that, although the landfill was approaching its 23-million-ton capacity, operational efficiencies left space within the vertical and horizontal envelope analyzed and approved as part of the Board of Supervisors Preferred Alternative. The limited waiver allows CCL to continue operation under the current CUP as long as the CCL and Los Angeles County are actively engaged in pursuit of a new CUP. The limited waiver allows CCL to accept waste up to the 29.4 million tons analyzed in the Final Environmental Impact Report for CUP No. 89-081-(5) and requires CCL to provide weekly reports to LADRP on document waste disposal rates and

The County has no obligations under the Agreement.

The existing CUP for CCL also includes the following condition:

#9c Nothing in Condition 9b or elsewhere in these conditions shall be construed to prohibit the permittee from applying for new permits to expand the landfill or to otherwise modify the conditions of this grant.

Condition #9c of the existing CUP makes clear that there is no prohibition against a future request for expansion. Also, when the Board of Supervisors approved the prior expansion in 1997, the Board specifically found that “additional capacity may be approved in the future...” The current request for an expansion (filed in October 2004 and subsequently amended) and therefore, a new CUP application, is entirely separate from the existing CUP. The County’s decision on whether to grant the application will be based on balancing, as applicable, the economic, social, technical, or other benefits of the proposed project against its potential environmental risks.

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remaining capacity. The waiver is scheduled to expire on July 31, 2017. However, the waiver will cease to be in effect before that date if a final approval or denial action is taken on the CUP application by the County, if the CUP is withdrawn by the applicant, or if the waiver is revoked by the Director of Planning.

# CCL Topical Responses

## 6. Cultural Resources

### Summary of Comments

Comments were received regarding the protection of cultural resources, with particular emphasis on Bowers Cave, Fernandeno Tataviam Band of Mission Indians (Tataviam) sites, and petroglyphs located on or near the landfill site area. It was noted that lead agencies should consider avoidance of sacred and/or historical sites first. Commenters requested that a mitigation and monitoring plan include provisions for identification and evaluation of archaeological resources and for the accidental discovery of Native American human remains. Commenters noted that in areas of identified archaeological sensitivity, a certified archaeologist and culturally affiliated Native American, should monitor all ground-disturbing activities. It was suggested that the Chumash Tribal Council and Tataviam be notified and approve any and all protection and impact proposals that would affect these sites. Additional archaeological activity should be coordinated with the Native American Heritage Commission. It was requested that the final cultural report be submitted immediately to Los Angeles County Department of Regional Planning (LADRP).

One commenter stated that the EIR must show how archaeological artifacts will be preserved and submitted to Los Angeles County for storage until a Castaic/Santa Clarita Valley Museum is built to house them. One commenter suggested that Bowers Cave be inspected by a state certified archaeologist and should receive state historic preservation status prior to the proposed expansion activities. One commenter stated that plans for escorting guests to view and study the sites must be proposed. It was suggested that landfill operations (specifically vibration and ground movement associated with grading) are a factor in the degradation of the cave. Finally, one commenter stated that Chiquita Canyon Landfill (CCL) purchased and obtained land that contains Bowers Cave in 2014. The commenter requested that all related documents for the purchase of this land be included in the EIR.

### Response

Potential impacts to Cultural Resources, including Bowers Cave, were addressed in the Draft Environmental Impact Report (EIR), Chapter 9, Cultural and Paleontological Resources. Mitigation Measures CR-1 through CR-3 of Chapter 9 address the identification and evaluation of archaeological resources during the life of the Project; monitoring of ground-disturbing activities in areas of archaeological sensitivity by a certified archaeologist and culturally-affiliated Native American monitor; and avoidance of sacred and/or historical sites at CCL. Furthermore, Mitigation Measures CR-1 through CR-3 describe a Cultural Resources Monitoring Plan (CRMP) that will include provisions for the management of cultural resources at CCL, including Bowers Cave, as well as the analysis and disposition of recovered artifacts. The CRMP will be developed in conjunction with LADRP and approved by LADRP prior to the beginning of any grading activity at CCL.

Archaeological activity at CCL has been and will continue to be coordinated with the Native American Heritage Commission and Tataviam. CCL has entered into an agreement with the Tataviam, which includes protection of Bowers Cave. Bowers Cave will be entirely avoided, as described in the Draft EIR. Mitigation Measure CR-2 describes development of a CRMP that will address expected impacts and protection plans for archaeological resources. Mitigation Measure CR-3 states that provisions will be made to provide cave access to Tataviam. Tataviam are providing construction monitoring and cultural

resource oversight, and Tataviam will act as a liaison between archaeologists, the permittee, contractors, and public agencies to ensure that cultural features are treated properly from the Tataviam point of view. Grading and excavation has been adjusted to exclude Bowers Cave. As the Draft EIR describes, artifacts from Bowers Cave were removed and sold in 1884. There are no known archaeological artifacts remaining within the cave at this time. All artifacts that may be found during ground-disturbing activities at CCL will be returned to the Tataviam or reinterred into the earth at the direction of the Tataviam. The Tataviam will be notified if any additional artifacts are discovered. The list of recommended Native American contacts, provided by Tataviam, is included in the Mitigation Monitoring and Reporting Program included in the Final EIR.

Because Bowers Cave is being entirely avoided by the Chiquita Canyon Landfill Master Plan Revision (Proposed Project), obtaining state historic preservation status is not required as an additional mitigation measure. Collapse of the cave ceiling is primarily attributed to time and seismic activity, particularly given that it was noted in 1885 that the cave bottom was covered with sand caused by disintegration of the roof and walls.<sup>1</sup> The CRMP will include provisions for monitoring construction and operation activities in the vicinity of Bowers Cave to ensure that physical impacts to the cave are prevented.

Finally, it is true that a recent lot line adjustment resulted in Bowers Cave becoming located within the property line of CCL. However, the comment regarding this transaction is not related to an environmental issue associated with the Proposed Project and the documents relating to this transaction have no bearing on the environmental analysis in the EIR. The EIR properly addresses potential impacts to Bowers Cave as a result of the Proposed Project.

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<sup>1</sup> Bowers, Stephen. 1885. "Relics in a Cave." *Pacific Science Monthly*. Issue 1. pp. 45-47.

# CCL Topical Responses

## 7. Cumulative Impacts

### Summary of Comments

Comments were received requesting that additional analyses of nearby residential developments, including but not limited to the Newhall Land and Farming projects be provided. It was stated that the Draft Environmental Impact Report (EIR) should acknowledge all existing and proposed residential, educational, and immobile population developments that may be impacted by the Project, and identify measures to protect public health and safety, and the environment. Specifically, it was requested that Table 3-1 be updated to include the distance from the disposal footprint to the nearest proposed enclosed structures. It was stated that the County of Los Angeles Countywide Siting Element prohibits construction of buildings or structure on or within 1,000 feet of a land disposal facility which contains decomposable materials/waste unless the facility is isolated by an approved natural or manmade protective system and that the Conditional Use Permit for the Puente Hills Landfill contained a requirement for the disposal footprint to be at least 2,000 feet away from the residential community.

It was also suggested that because there are many concurrent approved and pending developments for the surrounding parcels near the Proposed Project, Los Angeles County should be required to produce a Tiered EIR in accordance to *California Environmental Quality Act (CEQA)* Guidelines and statutes.

### Response

Significant cumulative impacts can result from individually minor but collectively significant impacts taking place over a period of time. The method of cumulative analysis used for the EIR relies on a list of past, present, and probable future projects. Original Draft EIR Chapter 3, General Setting and Resource Area Analysis, identifies cumulative projects, and Original Draft EIR Chapters 4 through 15 evaluate the potential environmental impacts by resource area of the Project on a cumulative project basis. Additional discussion has been added to Chapter 4, Land Use, in the Final EIR, to direct the reader to the sections of the EIR that address those potential impacts. The list of cumulative projects was generated by the Los Angeles County Department of Regional Planning (LADRP) based on the then-current lists of applications received and approved by the County within the vicinity of the Project, as well as lists provided by nearby cities and Ventura County as applicable. The cumulative project list and the cumulative project information are based on the best information available at the time of the issuance of the Notice of Preparation for the Draft EIR. The cumulative projects analyzed in the Original Draft EIR includes six projects proposed by Newhall Land and Farming, including Entrada, Mission Village, and Landmark Village.

The Original Draft EIR acknowledges all existing and proposed residential, educational, and immobile population developments that may be impacted by the Proposed Project. The projects identified in the cumulative impact area are primarily proposed land development for residential, commercial, industrial, and open space uses. The majority of the residential projects include mixed-use development consisting of single- and multi-family homes and condominiums, combined with commercial, park, trail, open space, and parking. These projects have been proposed by formal public notices (e.g., Notices of Preparation), have pending environmental documents, or are in the process of regulatory review and approval. Although any project could be modified, or even abandoned, the Original Draft EIR

acknowledges that large-scale development has been occurring in the vicinity of Chiquita Canyon Landfill (CCL) and is planned to continue in the foreseeable future, even if construction or operation timeframes change. Generally, the cumulative impact area of the Proposed Project encompasses development projects in proximity to CCL, within portions of unincorporated Los Angeles (western portion) and Ventura counties (southeastern portion). CEQA does not require that a cumulative projects list include detailed information regarding the proposed site plan for each related project. Consequently, Table 3-1 of the Original Draft EIR has not been updated with the requested information. However, the nearest future proposed residential development to CCL is Landmark Village, part of the Newhall Ranch Specific Plan. Based on the conceptual site plan for Landmark Village, the closest proposed residential dwelling is located approximately 1,000 feet from the proposed landfill waste footprint, on the other side of State Route (SR) 126. It should also be noted that the nearest residential dwelling associated with the Landmark Village is approximately 780 feet from the existing, closed, Primary Canyon at CCL, which is closer to the southern property line of CCL than the proposed waste footprint. Consequently, the proposed southernmost waste footprint at CCL will not be closer to future dwellings than the existing waste footprint at CCL.

Per CEQA (State of California Public Resources Code) Section 21068.5 and State CEQA Guidelines (State of California Code of Regulations Title 14, Chapter 3) Section 15385, a tiered EIR is required when a project is proposed to be developed and evaluated in phases. This is not the case with the Proposed Project, where the entire project has been identified and potential impacts associated with full development have been disclosed for agency and public review. A tiered EIR is therefore not warranted.

### **Visual Impacts**

The Original Draft EIR evaluated potential views of the landfill from the west, east, and south of the landfill. Key observation points (KOP) 3, 4, and 5, described in the Draft EIR, Chapter 15, Visual Resources, show these views. The most applicable of these views related to the proposed Newhall Land and Farm developments is KOP 4, which is a view of CCL from the south side of SR-126 at Wolcott Way, which is a future ingress/egress for Newhall Land and Farm developments. The Draft EIR found that future views from these locations would be less than significant.

The Visual Supplement included with the Partially Recirculated Draft EIR evaluated the view of CCL from Homestead Village, shown in KOP 9 of Figures VS-1 and in Figures VS-10 and VS-11. KOP 9 is directly south and slightly east of KOP 4 and provides an elevated view of CCL from a future proposed Newhall Land and Farm development. The analysis of the future view of CCL from KOP 9 found that while the increased maximum final elevation of the expanded landfill for the Proposed Project would be visible, following landfill closure, the revegetated landfill would represent an improvement in view over the existing landfill. Further, the engineered fill of the landfill would not block background ridgeline views, which would further reduce the potential for visual impacts.

The Proposed Project includes lighting design that will ensure that the Project has minimal visibility during nighttime hours. The lighting design will contribute to minimizing potential views from future Newhall Land developments.

Further, development of CCL is proposed in phases that would move landfill development to the north over time, away from SR-126 and proposed developments south of SR-126. The Fill Sequence Plan, shown in Figure 2-7 (Chapter 2, Project Description), shows that development of fill areas in the southern portion of the site would occur before fill activities in the East Canyon. Draft EIR, Chapter 15, Visual Resources, Section 15.6.3, Changes Associated with the Proposed Project states that:

- Entrance for construction would likely occur following project approval, which would allow fill activities to commence to the south

- Fill activity would move southward from the existing permitted fill area into the South Footprint before it moves into the East Canyon
- A berm and screening wall would be constructed along the west side of Wolcott Way, along the entire access road as it parallels SR-126

Additionally, known phasing for Newhall Land developments is anticipated to move in the opposite direction from CCL development, from immediately south of SR-126 (Landmark Village), to developments further south of SR-126.

This combination of phasing between CCL and NLF with shielded lighting to minimize nighttime views from NLF will help ensure that impacts to Visual Resources from future NLF are less than significant, similar to those described in the Draft EIR.

Please refer to the topical responses for Land Use (#15), Traffic (#25), and Visual Resources (#27) for a detailed discussion of cumulative impacts related to these resource areas. The Proposed Project includes measures to protect public health and safety, and the environment. The analyses found that the cumulative impact that would result from the combination of the Proposed Project's incremental impact and the effects of other projects is not considered to be significant.

### **Air Quality Impacts**

The Air Quality chapter has been revised to incorporate comments from the South Coast Air Quality Management District (SCAQMD) on the Original Draft EIR. The air quality analysis included in the Original Draft EIR was conducted consistent with published SCAQMD CEQA guidance, which required evaluation of project significance based on comparison of construction-related emissions to construction thresholds and operation-related emissions to operation thresholds. SCAQMD requested an alternate methodology be used, which combines the previously analyzed construction-related and operation-related emissions and compares them to the operation thresholds.

The revised air quality analysis in the Partially Recirculated Draft EIR concludes that combined construction and operation emissions, measured solely against operational thresholds, would result in potentially significant cumulative impacts. Mitigation measures have been proposed, but potential air quality impacts would remain significant and unavoidable.

### **Greenhouse Gas Emissions (GHG) and Climate Changes Impacts**

The GHG emissions from CCL that would occur with the Proposed Project have been estimated using published and accepted accounting standards. Regulations and strategies for GHG reductions in California continue to evolve, especially for the waste management sector. Little relevant guidance for assessing the significance of GHG emissions in environmental studies exists at the federal, state, or local level. The most useful option under SCAQMD guidelines is comparison of the project to existing GHG reduction plans. As a result, the GHG chapter has been revised in the Partially Recirculated Draft EIR to compare the GHG control techniques of the Proposed Project to those that would need to be implemented by the waste management sector in California to meet sector-wide and statewide GHG emission goals under the 2014 update to the California Air Resources Board (CARB) Scoping Plan. The revised GHGs and Climate Change chapter shows that the Proposed Project would result in emissions that would be 38.4 percent less than those that would result if CCL were designed and operated as per assumptions in CARB's business as usual forecast for landfills. Thus, Proposed Project emissions would be substantially less than planned per the Scoping Plan, would be consistent with existing GHG reduction plans, and would be less than significant through 2020.

Unfortunately, a similar comparison cannot be developed for the entire life of the landfill, because similar plans for the waste management sector have not yet been prepared by CARB or other entities. There are no GHG reduction plans after 2020 against which to measure the significance of the Proposed Project-related emissions. Therefore, for lack of methods to reliably determine significance of emissions after 2020, it has been conservatively assumed that Proposed Project and cumulative GHG impacts would be potentially significant and unavoidable in years after 2020. As a result, mitigation measures GHG-1 and GHG-2 have been proposed, and are included in the Mitigation Monitoring and Reporting Program included in the Final EIR, and CCL has committed to reducing landfill-related emissions to the extent technically feasible.

# CCL Topical Responses

## 8. Disposal Rate and Capacity

### Summary of Comments

Requests were received to provide further analysis and discussion, including but not limited to graphs and calculations based on the most current disposal information, to estimate the closure date of the Chiquita Canyon Landfill (CCL) based on its current Conditional Use Permit (CUP). Commenters requested that information about the daily intake for years when 1.326 million tons per year or more were taken as a way to verify that the landfill has been in compliance with their CUP. It was also requested that the tonnage calculated for Beneficial Use be included in the calculation of the daily tonnage limit. It was stated that the Draft EIR does not have a section relating to proper capacity control and a section should be provided that describes how the landfill has planned and budgeted, including providing detailed 3- year, 5-year, and long-term annual tonnage plans. Claims were made that CCL has done a poor job of managing their existing permit and will run out of capacity early. It was requested that CCL be limited to an amount equal to the average tonnage from the last 5 years. It was stated that this request is based on the information stated in Draft Environmental Impact Report (EIR) Chapter 2, Project Description, Section 2.2.2 and the fact that CCL disregarded the CUP condition of no sludge. Commenters noted that Section 1.5.1 of the Draft EIR states that the Integrated Waste Management Act requires a 15-year disposal plan, so CCL should be limited to a maximum of 15 years.

### Response

#### Quantity of Material Received at CCL

A full discussion of the recent historical operation of CCL, with regard to material received, was provided in the Partially Recirculated Draft EIR, Introduction, in Section 1.7, Recent Operation of CCL. This section provides an overview of CCL's operation relative to quantities of disposal material and beneficial use material received at CCL since the Notice of Preparation for the Proposed Project was issued in 2011.

#### Monitoring and Compliance

Landfills are a heavily regulated business that must regularly document and report information about their operations to state and local agencies. The current CUP includes a Monitoring Program as part of the conditions of approval for the existing facility (included as "Attachment to the Conditions of Grant for CUP 89-081[5]"). The Monitoring Program is intended to ensure compliance with the conditions of grant and other mitigation measures, and to complement the enforcement and monitoring programs routinely administered by Los Angeles County agencies including California Department of Resources Recycling and Recovery, the California Regional Water Quality Control Board (RWQCB), Los Angeles Region, the State Water Resources Control Board, and the South Coast Air Quality Management District (SCAQMD). Specifically, Part II- Waste Plan Conformance of the Monitoring Program, includes provisions to ensure compliance with the maximum allowable tonnage permitted (Conditions 9d-9j of the CUP). Part II requires CCL to maintain scales to verify the weight of wastes received, diverted, or rejected; maintain records necessary to document tonnage and compliance with waste restrictions; and maintain records concerning the composition and origin of waste. All records shall be made available for inspection by the Los Angeles County Department of Public Health (Lead Enforcement Agency for CCL), and the Departments of Public Works, Regional Planning, and the Treasurer and Tax Collector.

Part VII- Monitoring Reports of the Monitoring Program, requires CCL to submit a Biennial Monitoring Report to the Department of Regional Planning which details CCL's waste acceptance data, including the annual and cumulative disposal totals, remaining capacity, density calculations with a comparison to industry standards, and monthly acceptance rates. The Biennial Monitoring Report also includes a Waste Disposal Plan (a survey showing the height and extent of the fill), the status of the Materials Recovery Facility (MRF), the community/regulatory history, and the landfill's compliance with and status of mitigation measures. Copies of the report are also required to be provided to the:

- Los Angeles Department of Public Health (Local Enforcement Agency)
- Director of Los Angeles County Public Works
- Los Angeles County Forester and Fire Warden
- Los Angeles RWQCB
- South Coast Air Quality Management District
- Val Verde Community Advisory Committee (VVCAC)

In addition to the Biennial Monitoring Report described above, CCL maintains records for the Disposal Reporting System as required by Title 14 *California Code of Regulations*, section 18800 et seq. In accordance with these requirements, CCL records the total amount of daily material at the landfill. This information is provided to the Los Angeles County Department of Public Health, Los Angeles County Department of Public Works, and the Val Verde Community Advisory Committee generally on a monthly or quarterly basis, depending on the agency. In addition, every quarter, CCL is required to report an estimate of the remaining capacity (in cubic yards and tons), and the remaining life of the existing permitted disposal facility in years and months. Additional information concerning the design and operation of the facility must be furnished at the request of the Local Enforcement Agency. Because of the frequent and comprehensive reporting requirements for CCL, the requested "annual tonnage plans" and "capacity control" by the commenter are not necessary and the comment did not provide further details what the requested plans/reports should include.

See Topical Response #4, Compliance, for a discussion of CCL's compliance with its current CUP, including acceptance of sludge.

### **Beneficial Use Material**

The tonnage for Beneficial Use Material is not included in the calculation of the daily Disposal tonnage limit because Beneficial Use falls under the definition of diverted waste, not disposed waste, consistent with Title 14 and Title 27 of the *California Code of Regulations*. The current CUP also does not currently limit the tonnage of diverted materials that can be received. Conditions 9d-9f of CUP No. 89-081(5) state:

- d. "The net tonnage placed in the landfill shall not exceed 30,000 tons per week (5,000 tons per day average based upon 6 working days per week)."
- e. "The net tonnage of waste placed in the landfill on any given day shall not exceed 6,000 tons."
- f. "Net tonnage shall not include:
  - Clean dirt or other approved materials used for daily cover, to cover and prepare interim and final slopes, or for other construction purposes; and
  - Waste processed and put to beneficial use on the landfill or separated or otherwise diverted from the waste stream and exported from the landfill for the purpose of recycling or reuse, in accord with the restrictions of Condition 9j and the agreement entered into pursuant to Part II of the attached monitoring program, and including waste handled through any materials recovery facility, hazardous waste facility or composting facility within the restrictions set forth in Condition 10, 11, and 12".

The operational baseline for CCL, with regard to waste disposed and beneficial use material, was described in the Partially Recirculated Draft EIR, Introduction, in Section 1.5, Clarification of Operational Baseline. Table 1-1, Material Received, shows that in the baseline year, 2011, CCL received an average of 2,358 tons per day of beneficial use material. The Proposed Project includes continued receipt of beneficial use material at this average rate.

Please see Topical Response #28 for a discussion of Waste Diverted.

### **Landfill Closure Date**

The current CUP for CCL has the following different triggers for closure of the landfill:

1. Date (November 24, 2019)
2. Overall disposal limit (23 million tons)
3. Fill design (defined by the CUP grading plan/height limit)

These three conditions of the CUP are separate, distinct, and independent of each other.

The first two conditions limit the total amount of material that can be disposed, and duration of the landfill's operating life, irrespective of whether the landfill has remaining waste capacity or has reached its permitted grading plan or height. Thus, these two conditions would result in the early closure of the landfill before its capacity can be realized.

As discussed in the Introduction chapter of the Partially Recirculated Draft EIR, CCL reached the 23-million-ton overall disposal limit described in CUP Condition 46 in July 2016. Prior to that date, CCL requested and received a limited operational waiver issued by the Los Angeles County Department of Regional Planning pursuant to Los Angeles County Code Section 22.04.110, which became effective in July 2016. The waiver was supported by an approved Addendum to the 1997 Final EIR prepared pursuant to *California Environmental Quality Act* Guidelines Section 15164 which discloses that, although the landfill was approaching its 23-million-ton-capacity, operational efficiencies left space within the vertical and horizontal envelope analyzed and approved as part of the Board of Supervisors Preferred Alternative. The limited waiver allows CCL to continue operation under the current CUP as long as the landfill and County are actively engaged in pursuit of a new CUP. The limited waiver allows CCL to accept waste up to the 29.4 million tons analyzed in the Final EIR for CUP No. 89-081 and requires CCL to provide weekly reports to Los Angeles County Department of Regional Planning that document waste disposal rates and remaining capacity. The waiver is scheduled to expire on July 31, 2017. However, the waiver will cease to be in effect before that date if a final approval or denial action is taken on the CUP by the County, if the CUP application is withdrawn by the applicant, or if the waiver is revoked by the Director of Planning. Please see Topical Response #31 for a detailed discussion of the Limited Operational Waiver.

With respect to the comments about capacity controls and the date by which the landfill would reach its tonnage limit, the amount of waste accepted at the landfill varies from day to day and year to year within the amount of annual and daily tonnage allowed, depending on a variety of factors. The factors include but are not limited to the market conditions, including the overall economy and resulting changes in waste generation rates, the amount of demolition and construction debris generated, and changes in haul contracts. As noted above, the landfill reached the overall disposal limit under the current CUP in July 2016; this does not change the analysis of environmental impacts related to the expansion, or the need for the expansion in order to provide additional disposal capacity.

It should be noted that because CCL efficiently compacted waste, it reached the 23 million ton overall disposal limit specified in the CUP before it reached the November 24, 2019 closure date or fill design.

### **Los Angeles County Countywide Integrated Waste Management Plan**

The California Integrated Waste Management Act of 1989 (also known as Assembly Bill 939), requires each county to prepare a countywide siting element (CSE) that describes how the county and the cities within the county plan to manage the disposal of their solid waste for a 15-year planning period. Although the CSE is based on a 15-year period, it does not mean that beginning in 2015, the County is only planning on meeting its' waste disposal needs through 2030. Every year, the Los Angeles County Department of Public Works prepares the Los Angeles County Countywide Integrated Waste Management Plan Annual Report, which summarizes the changes that have taken place since the approval of the CSE and Countywide Summary Plan. Because the report is updated annually, the planning period continues to be extended by another year. Long-range strategic planning (beyond just a 15-year period) is good public policy and also necessary to ensure that waste generated by the County is safely and economically disposed of and that the County's future disposal needs are met indefinitely. Accordingly, the terms of the CUP should extend beyond the 15-year planning period for the CSE and the Los Angeles County Countywide Integrated Waste Management Plan Annual Report. This is particularly evident given the lengthy regulatory process of securing additional landfill disposal capacity. See Topical Response #19 for additional information concerning the need for the Project.

# CCL Topical Responses

## 9. Environmental Justice

### Summary of Comments

Many comments were received on the subject of Environmental Justice, including comments regarding the methodology used and the significance determination. The comments are summarized below.

### 9a Methodology

#### Comment Summary

Comments were made suggesting that the Draft Environmental Impact Report (EIR) did not accurately evaluate the potential Environmental Justice impacts to the community of Val Verde. Commenters stated that the data to determine if Val Verde has a disproportionate population of minorities and low-income residents should be compared to its region and that regionally, Val Verde is part of Santa Clarita and Castaic. It was suggested that comparing the vast region of Los Angeles to Val Verde to determine if Val Verde is an affected population does not determine the socioeconomic characteristics of Val Verde in relation to its surrounding areas. It was stated that using County of Los Angeles statistics for affected areas based on the point that the entire County would benefit from the Project approval is flawed and illogical. It was suggested that the guidelines to determine “affected populations” do not include potential benefits to a wide region. It was recommended that if a larger general area is desired, much of Ventura County should be considered. It was also stated that level of education is an important determining factor for income, poverty, health and well-being and is closely correlated in the U.S. Census American Community Survey (ACS) data. It was stated that an evaluation of education was missing from the Draft EIR. It was stated that the County should make a good-faith effort to temporarily and immediately suspend the EIR process until the Draft EIR can be amended to reflect accurate information.

One commenter provided numerous recommendations on how the commenter believed the analysis should be revised to accurately evaluate the environmental justice impacts to Val Verde. The recommendations generally included updating health and environmental data specific to the community of Val Verde, using an Environmental Justice expert to perform the analysis, notifying all agencies whose scope includes provisions and/or enforcement of the Proposed Project that their own Environmental Justice regulations need to be applied to the Proposed Project and requesting input from the agencies on how to accurately collect and compile data.

#### Response – General Methodology for Environmental Justice

Broadly speaking, an evaluation of Environmental Justice is undertaken to ensure that the potential environmental impacts of a project do not disproportionately affect a disadvantaged community. The methodology for assessing Environmental Justice is generally described below:

First, the minority and income status of the community in which a project is located is compared to the minority and income status of the population within a larger geographic unit in which the project is located.

Environmental Justice analyses typically rely on the most recent U.S. Census data that provides information at the smallest geographic unit available. Typically, the Census Block is the smallest

geographic unit, but because census block group data only includes minority data and is only updated once a decade, other data may be used, for example, ACS 5-year Estimates. The ACS 5-year Estimates provides data at the Census Block Group level and provides data for both minority and low-income populations. Low-income populations are considered to be populations living below the poverty line.

Level of education is not typically applied to a determination of disadvantaged population. However, an evaluation may include the use of limited English proficiency to help define minority populations and languages that would be needed to translate materials as appropriate.

The minority and income status of the population within the geographic unit in which the project is located is compared to the minority and income status of the population within the larger geographic unit in which the project is located. The comparison looks at whether the population in the smaller geographic unit closest to the project, and therefore potentially more likely to be impacted by the project, has a significantly greater minority population or a significantly lower income than the population of the larger geographic unit.

If either of these conditions are present, the population in the smaller geographic unit is potentially a disadvantaged population, and a more detailed evaluation of the potential for Environmental Justice impacts should be undertaken. Specifically, the project evaluation would then look in detail at the potential impacts of a proposed project and determine if the impacts of the project would disproportionately affect the disadvantaged population. If the impacts would disproportionately affect a disadvantaged population, then there is likely an Environmental Justice issue.

If neither of these conditions are present, then it is unlikely that the community within the smaller geographic unit closest to the Proposed Project is a disadvantaged population and it is further unlikely that there is a potential for an Environmental Justice issue. This is not to say that the community within the smaller geographic unit closest to the project is free from potential impacts, only that those potential impacts would not result in an Environmental Justice impact.

## **Response – Methodology Used for Chiquita Canyon Landfill**

The Original Draft EIR for the Proposed Project used the methodology described above. The demographic characteristics of the population for Val Verde (the census block within which the Proposed Project is located) were compared to the demographic characteristics of the population of Los Angeles County (the larger geographic unit within which the Proposed Project is located). CCL is a regional landfill located entirely within unincorporated Los Angeles County. Although the landfill is located near Ventura County, it primarily serves communities and cities of Los Angeles County. Therefore because the landfill is located entirely within Los Angeles County, and because the Los Angeles County Department of Regional Planning is the Lead Agency, it is appropriate to compare the demographic characteristics of the population of Val Verde with the demographic characteristics of the population of Los Angeles County.

## **9b Significance Determination**

### **Comment Summary**

Commenters stated that the Proposed Project will disproportionately affect a predominantly Hispanic and low income population in Val Verde. It was stated that the Draft EIR considers the issue of Environmental Justice to be non-applicable to the Proposed Project and that this finding is inaccurate and unacceptable. It was stated that the Hispanic population will suffer financial and quality of life losses, and health issues. It was also stated that the residents of Val Verde express an experience of being unjustly treated by the County and treated as a sacrifice zone to receive wastes from the rest of

the region. It was stated that the impacts on the residents are not only physical/environmental, but also include serious experiences of dread, emotional fatigue, and social stigma. Commenters stated that Val Verde is conscripted to receive waste that it did not generate and suffer effects the rest of the County residents do not, while also having a lack of benefits (such as receipt of a share of tipping fees, job allocation/quota for local residents, infrastructure/urban amenities, health services and insurance, etc.) that might partially ameliorate for the negative impacts of the landfill. Finally, it was stated that placing potentially the nation's largest landfill next to one of the nation's poorest communities is a blatant violation of *the California Environmental Quality Act* and the Civil Rights Act of 1964.

## Response

The evaluation of minority population in Val Verde and Los Angeles County in the Original Draft EIR found that the minority population of Los Angeles County was 72.2 percent of the total population, while the minority population of Val Verde was 70.1 percent of the total population. The evaluation of median household income in the Original Draft EIR found that the median family income for the time period 2006 to 2010 in Los Angeles County was \$55,476. During the same time period, the median family income in Val Verde was \$56,934. Also, the Original Draft EIR found that the number of individuals below the poverty line in Los Angeles County was 15.7 percent of the total, while the number of individuals below the poverty line in Val Verde was 9.1 percent of the total.

Based on the methodology described above, the Original Draft EIR correctly determined that the community of Val Verde is not a disadvantaged population, as measured by minority or low-income characteristics compared to Los Angeles County. Therefore, the Proposed Project would not disproportionately impact a minority or low-income population, and the Proposed Project would not result in Environmental Justice impacts.

The demographic characteristics of Val Verde and Los Angeles County were reviewed for updates that may change this determination. The latest available ACS 5-year estimates were reviewed, and it was found that Val Verde has a mean annual resident income above the County average. The minority population in both Val Verde and Los Angeles County has increased, with Val Verde now at 78.7 percent of the total population and Los Angeles County at 73.1 percent of the total population. However, this difference is not meaningful, because the concentrations of the minority populations is similar (a 5.6 percent difference). The proportion of low-income persons (i.e. persons living below the poverty line) in Los Angeles County is greater than Val Verde (18.2 percent and 16.8 percent, respectively). Table 1 presents this updated demographic characteristics data based on the 2011-2015 ACS 5-year Estimates.

**Table 1 Demographic Characteristics**

<b>Demographic</b>	<b>Val Verde</b>	<b>Percent</b>	<b>Los Angeles County</b>	<b>Percent</b>
Total Population	2,697		10,038,388	
Minority	2,122	78.7	7,334,841	73.1
Hispanic or Latino	1,794	66.5	4,842,319	48.2
Population for whom poverty status is determined	2,697		9,886,133	
Low-Income Population	454	16.8	1,800,265	18.2
Median Household Income	\$72,031		\$56,196	
Population 5 years and Over	2,502		9,396,753	
Limited English Proficiency	586	23.4	2,379,799	25.3

The updated review of demographic characteristics (described above and presented in Table 1) in Val Verde and Los Angeles County does not change the findings of the Original Draft EIR. The Proposed Project would not disproportionately impact a minority or low-income population, and the Proposed Project would not result in Environmental Justice impacts.

The existing physical infrastructure in Val Verde, availability of health services and insurance, and other “benefits” raised by the commenters are unrelated to the Proposed Project. The Proposed Project does not result in any impacts to community resources including resources that serve an especially important social, religious, or cultural function for a minority and/or a low-income population.

It is incorrect that CCL would be potentially the nation’s largest landfill. Even with the Proposed Project at 12,000 tons per day of disposal, CCL would be smaller than two other landfills in Southern California, based on the California Department of Resources Recycling and Recovery Solid Waste Information Management System (SWIMS). SWIMS shows the daily permitted capacity at Sunshine Canyon Landfill in Los Angeles County and El Sobrante Landfill in Riverside County is 12,100 tons per day and 16,054 tons per day, respectively. It should further be noted that landfills in California are restricted by daily tonnage limits, while landfills in most other parts of the country are not. Therefore, it is impossible to compare the Proposed Project, which requested or 12,000 tons per day to landfills without a daily tonnage limit.

Neither the Project nor the current EIR review process is in violation of *the California Environmental Quality Act* or the Civil Rights Act.

## 9c Other Comments

### Comment Summary

Other specific comments related to Environmental Justice include comments that the version of the Office of Environmental Health Hazard Assessment’s (OEHHA) Cal/EnviroScreen 1.1 listed is not the current version of the program, that the EIR be reviewed by the California EPA and the State Attorney General before the approval process moves forward in the county as an Environmental Justice issue, and that the LA County Water District 36, Newhall Water District, Castaic School District, Hart School District, Chumash Tribal Council, Fernandeno Tataviam Tribal Council, California State Attorney General, Los Angeles County Assessor's Office, Castaic Chamber of Commerce, California Air Resources Board, and South Coast Air Quality Management District be added to the list of reviewing agencies.

### Response

The Castaic School District, Hart School District, Fernandeno Tataviam Tribal Council, California Air Resources Board, and South Coast Air Quality Management District have been notified and/or have commented on the Proposed Project. The other agencies listed are not located within 1,000 feet of the Proposed Project site or do not have jurisdiction over the Proposed Project. It is not the Los Angeles Department of Regional Planning’s protocol to send a Draft EIR of this nature to the State Attorney General or the Los Angeles County Assessor's office.

In response to the comment questioning the OEHHA model, OEHHA's Cal/EnviroScreen 1.1 was the current version of the program at the time the Draft EIR was released for public review. CalEnviroScreen 3.0 is the current version of the OEHHA model referenced. This model is discussed in Topical Response #21, Public Health.

# CCL Topical Responses

## 10. Environmental Monitoring

The Environmental Monitoring Program for surface water and groundwater, leachate, and air and landfill gas (LFG) is described in detail in the Original Draft Environmental Impact Report (EIR) and in the Partially Recirculated Draft EIR Chapter 2, Project Description, and summarized in the response to comments below.

### 10a. Groundwater Quality Monitoring

#### Comment Summary

Comments were received regarding the need and/or adequacy of the environmental monitoring program for area groundwater monitoring wells and riverbed aquifer monitoring. It was requested that the landfill show the community the test results from sampling every half hour, which was stated to be a water agency requirement. Comments were made regarding private or Water District 36 wells, more frequent monitoring requirements for groundwater, and offsite monitoring requirements for groundwater.

#### Response

Potential impacts to water quality for the Proposed Project are addressed in Draft EIR Chapter 7, Water Quality. Water quality monitoring for the protection of groundwater at Chiquita Canyon Landfill (CCL), both for the existing landfill and the proposed expansion, is required by both state and federal regulations, and is under the regulatory authority of the California Regional Water Quality Control Board, Los Angeles Region (RWQCB). California water quality monitoring requirements are contained in Title 23, Chapter 15, Article 5, of the California Code of Regulations. Groundwater testing beyond the regulatory requirements is neither warranted nor required. Sampling water every half hour, which was referenced by one commenter as a water agency requirement, is not a requirement of any applicable regulations.

Water quality monitoring has been conducted at CCL since January 1986 and began with the installation of a groundwater monitoring well network. The current program includes an extensive ground water monitoring network, including point of compliance monitoring for potential releases, as required by the RWQCB. The program requires monitoring of the groundwater and the unsaturated (vadose) zone, monitoring for leachate production, monitoring of surface water, and monitoring of the incoming waste stream. The monitoring program is conducted in accordance with the current Monitoring and Reporting Program (MRP) contained in RWQCB Order No. 98-086. Quarterly monitoring is required by the current waste discharge requirements (WDRs) and MRP for the landfill, and data are reported in semiannual and annual reports submitted to RWQCB. The monitoring program for the Proposed Project will be similar to the existing program and will require approval by the RWQCB under the landfill facility WDRs.

As described in the Partially Recirculated Draft EIR Section 2.2.8.4, Groundwater and Vadose Zone Monitoring, the extension of the landfill footprint will require abandoning monitoring wells DW-3, DW-6, DW-12, DW-20, DW-24, and DW-25, and piezometers PZ-3, PZ-5, PZ-6, and PZ-7. These will be replaced by seven new monitoring wells (MW-29 through DW-35). Table 2-6 (Chapter 2) of the Partially Recirculated Draft EIR summarizes the Proposed Groundwater Monitoring System, and Figure 2-8 shows the location of the existing and proposed groundwater monitoring network. The monitoring wells are

sited to provide the most effective downgradient and upgradient monitoring. The new monitoring wells will be installed prior to landfill development, so that background water quality can be established for each well. As required by RWQCB, all drilling, soil sampling, logging, well construction, and development is conducted under the direction of a California-registered professional geologist. A California-licensed drilling company will drill, construct, and develop the monitoring wells. In addition to collecting groundwater samples from the monitoring wells, other tasks are performed for a typical monitoring event. These tasks include measuring the depth to water in each well, performing and documenting quality assurance/quality control procedures, and visually inspecting the wells to see that they are in proper working order. Groundwater flow at the landfill is evaluated based on the water levels measured in the wells. A potentiometric surface map is constructed, and the groundwater flow direction and gradient are estimated.

Riverbeds are not directly monitored because CCL has an existing onsite groundwater monitoring well network to identify releases. Santa Clara River bed monitoring is not required or planned to be performed as part of this project, and there have been no groundwater or stormwater releases from CCL to indicate the riverbed is threatened. Similarly, there are no offsite groundwater monitoring wells or proposals to install such, because of the extensive onsite groundwater monitoring well network.

Draft EIR, Chapter 7, Section 7.6.1, describes the current and proposed groundwater monitoring and reporting program for CCL. This program includes an extensive groundwater monitoring network, including point of compliance monitoring for potential releases along the entire downgradient perimeter of the landfill, as required by the RWQCB. These monitoring wells are located to provide the earliest indication of groundwater quality changes in the unlikely event of a release from the lined landfill. As described in Chapter 7, the Proposed Project would be in compliance with National Pollutant Discharge Elimination System (NPDES) requirements, California Code of Regulations Title 27 requirements, and Orders and WDRs issued by the RWQCB. Contamination of groundwater in the vicinity of CCL is not an anticipated impact of the Proposed Project, and groundwater testing beyond the landfill boundary is neither warranted nor required.

With regard to comments that the Proposed Project could potentially impact Water District 36 wells, groundwater flow directions across the project site are well documented to be primarily south and east, generally following the predevelopment surface topography. Groundwater does not flow northwest toward private wells in Val Verde because of the geologic structure and the presence of significant stratigraphic barriers to groundwater flow. Thus, if there are water quality issues in Val Verde wells, such issues would not be the result of groundwater flow from CCL.

Along the northeast perimeter of the site, groundwater flows easterly, not north toward the District 36 well at the corner of Del Valle and Hasley Canyon roads. Groundwater flow north to the District 36 well is precluded by the east-southeast plunging anticline and aquitard layers within the sedimentary sequence, and two branches of the Holser Fault, which likely act to retard groundwater flow across the zone of faulting. The complex bedrock aquifer conditions in this vicinity are not comparable to the referenced alluvial aquifer pumping in the City of Santa Clarita. There is no probability that pumping the District 36 well would draw in groundwater from beneath the landfill.

With regard to comments regarding analyzing groundwater for constituents of concern (COC), Groundwater monitoring requirements for CCL are established in Waste Discharge Order No. 98-086. The site COCs are listed in Order 98-086, page 8, under D. Water Quality Protection Standards. Note that the COC table does not list all constituents by name. Herbicides, pesticides, PCBs, semi-volatile organic compounds, and volatile organic compounds are only listed by their respective test methods. Appendix II of 40 CFR Part 258 Subtitle D lists the constituents that need to be included in each test method. Testing for COCs for groundwater at CCL will continue to be performed according to the requirements of the

RWQCB for the Proposed Project, which also includes testing for COCs in the event that the quarterly monitoring parameters indicate a release.

## **10b. Surface Water Quality Monitoring**

### **Comment Summary**

Comments were received regarding the need and/or adequacy of the environmental monitoring program for surface water runoff.

### **Response**

Similar to groundwater, stormwater runoff is currently and will continue to be monitored as required by the RWQCB and current and future WDRs for CCL. CCL manages stormwater from the 639-acre facility in compliance with the federal Clean Water Act, which guards against contamination that could come from the landfill to surface waters, including the Santa Clara River. As required by the Clean Water Act, CCL has a NPDES Permit from the RWQCB that addresses specific design and applicable water quality standards at the facility. CCL manages, monitors, and discharges stormwater in accordance with the NPDES permit and the following additional plans that are required under the NPDES Permit: Stormwater Pollution Prevention Plan, the Stormwater Monitoring Program, and the Spill Prevention, Control, and Countermeasure Plan, as described below. These are described in Section 2.2.8.6, Surface Water Monitoring, of the Partially Recirculated Draft EIR.

Stormwater discharge from the site will continue to be sampled and analyzed in a manner consistent with the monitoring program outlined in the Stormwater Pollution Prevention Plan and Stormwater Monitoring Program. Stormwater discharge samples will be analyzed for ammonia, biochemical oxygen demand, cyanide (total), nitrate and nitrite nitrogen, hydrogen ion concentration (pH), phosphorous (total), total suspended solids, specific conductance, oil and grease, volatile organic compounds, sulfate, chemical oxygen demand, total dissolved solids, and the following metals (total): antimony, arsenic, beryllium, cadmium, chromium, copper, iron, lead, magnesium, mercury, nickel, selenium, silver, thallium, and zinc.

Draft EIR Chapter 7, Water Quality, states that the Proposed Project will implement required water quality monitoring and response programs for detecting, characterizing, and responding to releases to surface water. The RWQCB will specify, in facility-specific WDRs, the type or types of monitoring programs required and the specific elements of each monitoring and response programs. Compliance with the WDRs, including required monitoring for surface water, will ensure the potential impacts of the Proposed Project on surface water are less than significant. No additional monitoring requirements are warranted.

## **10c. Leachate Monitoring**

### **Comment Summary**

Comments were received regarding the need and/or adequacy of the environmental monitoring program for leachate and need for leachate testing. Comments were received indicating that implementation plans must be presented for leachate monitoring. Comments were also received stating that leachate tests should be conducted at CCL and that such testing would show what waste was brought and what can potentially leave the landfill as gases, odors, particulate, or solid waste, and asked if the results of the tests can be provided. One commenter indicated that collection of an annual leachate sample is inadequate. In addition, one comment inquired if there are plans to install a leachate treatment facility onsite.

## Response

Consistent with Title 27, and the WDRs and MRP issued by the RWQCB for CCL, leachate at the landfill is monitored and tested. The landfill liner system is designed to contain leachate that may accumulate in the landfill and direct it to a leachate collection and removal system sump or storage tank. The leachate is pumped from the collection points periodically, and is currently transported offsite for disposal. Leachate is evaluated annually for COCs in accordance with accepted quantitative analytical procedures and data are reported in the groundwater semiannual and annual reports submitted to RWQCB. Refer to 10a. Groundwater Monitoring, for additional discussion with respect to groundwater monitoring.

Annual collection of a leachate sample, as required by the WDRs and MRP for CCL, is adequate, particularly as leachate is currently transported offsite for disposal. The Proposed Project proposes using leachate onsite for dust control only if WDRs for CCL are revised by the RWQCB. In that case, leachate would either be used for dust control only on the waste footprint within a lined cell, or would be treated onsite before being used for dust control elsewhere on the site.

## 10d. Landfill Gas Monitoring

### Comment Summary

A commenter noted that a report referenced in the Original Draft EIR states that volatile organic compounds (VOC) detected in wells DW-1, DW-3, DW-16, and DW-20 are attributed to LFG migration alone. However, the commenter believes that the presence of VOCs can also be due to historical disposal of industrial wastes that occurred at CCL rather than landfill gas (LFG) migration. Another comment was received indicating that the EIR should specify a minimum number of gas probes needed for LFG monitoring and that gas probes should be installed offsite. A comment was received indicating that common LFGs must be monitored. In addition, a comment was received stating that air and LFG monitoring should be done by an agreed third party monitor.

### Response

The report referenced by the commenter is correct regarding the source (LFG) of the VOCs found in the referenced wells. Release investigations found the same VOCs present in LFG, soil gas, and groundwater, demonstrating a transport path from the base of the landfill, through the underlying geologic materials, to groundwater. The installation and operation of LFG collection system improvements resulted in reduced VOCs in groundwater at the impacted wells, which indicated that LFG was the source of the VOCs. These VOC releases occurred from an unlined portion of the landfill before implementation of requirements for landfill liner systems, and does not reflect a potential impact of the Proposed Project, because the waste footprint of the Proposed Project would be lined.

Section 2.2.8.7, Air and Landfill Gas Monitoring, of the Partially Recirculated Draft EIR Project Description, provides a detailed discussion of LFG monitoring. In summary, CCL conducts LFG collection and monitoring in compliance with SCAQMD Rule 1150.1 requirements for control of LFG emissions, U.S. Environmental Protection Agency (EPA) New Source Performance Standards/Emission Guidelines, and Landfill Methane Capture regulations. CCL has a site-specific Rule 1150.1 Compliance Plan, in accordance with SCAQMD Rules and EPA regulations, and has a Title V permit issued by SCAQMD. The Rule 1150.1 Compliance Plan requires CCL to evaluate the performance of the LFG collection and control system by monitoring monthly for the emission or migration of LFG from the landfill. Other parts of the Title V permit place performance standards and testing requirements on the LFG flare. LFG sampling is also required to evaluate the quality and components of the LFG being generated. All landfill areas are monitored regularly to detect onsite LFG surface emissions or subsurface migration of LFG.

In addition to the SCAQMD requirements, CCL has a Title 27 LFG monitoring plan approved by the Lead Enforcement Agency and California Department of Resources Recycling and Recovery. Therefore, there is no need for air and LFG monitoring to be performed by a third party monitor.

Figure 2-9 of the Partially Recirculated Draft EIR shows the location of existing and proposed LFG monitoring probes. Given the extensive network of LFG probes around the site boundary and robust monitoring program, there is no requirement or need for offsite gas probes to be installed.

## 10e. Air Quality Monitoring

### Comment Summary

Comments were raised regarding the need and/or adequacy of the environmental monitoring program for air quality and odors. Specific comments regarding air quality monitoring include concern that the stations used to monitor air quality are too far from CCL; that there is no monitoring for hydrogen sulfide, which can impact health at certain concentrations; and that there is no monitoring of methane, ammonia, and other LFGs. Comments were provided regarding odor inspections and requesting details on measures to prevent nuisance due to odors emanating from the landfill. A comment was provided requesting clarification on landfill hours of operation.

### Response

As stated in Section 2.2.8.7, Air and Landfill Gas Monitoring, of the Partially Recirculated Draft EIR Project Description, the LFG surface monitoring program consists of monthly and quarterly instantaneous landfill surface monitoring to evaluate potential emissions on the landfill surfaces, ambient air sampling at the landfill site boundaries to evaluate the potential offsite migration of landfill emissions, and quarterly and annual reporting to the SCAQMD. The LFG surface monitoring program is designed for CCL to identify surface emissions of LFG at the earliest possible moment. This compliance program requires CCL to mitigate or correct any such identified emissions or migration in a timely fashion, and to re-inspect the suspect area within a stated time period to confirm attainment of the standards.

With respect to attainment status and attainment monitoring data, SCAQMD continuously operates a network of ambient air quality monitors in the Los Angeles basin, including several locations near the landfill. The air monitoring stations monitor for the pollutants that the state and local air quality agencies consider to be pollutants of concern, and the stations are operated according to strict protocols for sampling, analysis, and data validation and reporting. Pollutants monitored include the criteria pollutants required by the federal clean air act for the National Ambient Air Quality Standards established by the EPA. These criteria pollutants include ozone, CO, nitrogen dioxide, particulate matter less than 10 micrometers in aerodynamic diameter or 2.5 micrometers (PM<sub>2.5</sub>), sulfur dioxide, and lead. Associated data for these monitoring stations were taken from data published by the California Air Resources Board and EPA. As stated in Section 11.3.3.2, Air Monitoring Data, of the Partially Recirculated Draft EIR, three of the nearest monitoring stations were used to gather information regarding the air quality around CCL: Burbank – West Palm Avenue, Reseda, and Santa Clarita stations. The Santa Clarita station is the closest to the Proposed Project site, approximately 7 miles from the landfill entrance. Sulfur dioxide and PM<sub>2.5</sub> monitoring data are not available at the Santa Clarita station, therefore, the Burbank and Reseda stations were used for sulfur dioxide and PM<sub>2.5</sub> data, respectively.

Additional air monitoring is conducted at CCL, in the form of weather stations located onsite. One of these has been onsite for 20 years, with a second added 14 years ago proactively by CCL specifically to monitor winds blowing toward Val Verde. These weather stations provide an overview of winds in the

area and provide historical as well as real-time information regarding wind. As a practical tool for immediate visual recognition of wind direction and speed, CCL utilizes multiple wind flags positioned throughout the site, which provide real-time wind direction and speed information to onsite field personnel, allowing them to take immediate steps to address the potential for offsite migration of odor.

Additionally, please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects, for additional information.

# CCL Topical Responses

## 11. Geologic Hazards

### Summary of Comments

Comments were received expressing concern that the landfill expansion design has not adequately considered liquefaction and potential seismic hazards, such as impacts on liner construction and slope stability. The Val Verde Civic Association (VVCA) in particular, requested specific information about the methodology used to evaluate slope stability. Concern was raised that unverified and unrealistic values were used to increase the factor of safety for the stability analysis, thereby creating a false stability analysis, whereas a potentially unstable one may exist. VVCA requested that all geotechnical-related reports and analyses be made available to the VVCA for peer review prior to approval of the Environmental Impact Report (EIR).

Additional comments stated that there is an increased risk of landslides from earthquakes and during El Nino years and that the project is a landslide risk to Val Verde and the proposed Landmark Village Development. It was stated that there is a lack of mitigation for catastrophic geological soils failure and that the proposed mitigation measures do not address the loss of life, property, environmental pollution, reduced access to Chiquito Canyon Road, and details about the future structural integrity of previously graded and adjacent areas. Comments referenced previous incidences at the landfill that occurred during the Northridge Earthquake in 1994 and during the rainy season in 2004 to 2005.

### Response

#### Liquefaction Analysis in the Draft EIR

Original Draft EIR Chapter 5, Geology and Hydrogeology, Section 5.6.5.6, Liquefaction Hazard, describes the potential for liquefaction at Chiquito Canyon Landfill (CCL) as a result of a seismic event (ground shaking of sufficient magnitude and duration). This section states that soils that are susceptible to liquefaction (loose alluvial soils) "within the proposed development area will be removed and replaced with compacted fill soils." Ultimately, "the site will be underlain by a combination of bedrock materials, dense alluvial deposits, and engineered fill." The section also states, "Since the alluvial soils that have a potential to be subject to liquefaction are not saturated when the groundwater is at its historical high level, the proposed development area is considered to have a very low potential for liquefaction."

The combination of detailed geologic investigations and project design features ensure that potential impacts associated with liquefaction will be less than significant.

#### Seismic Analysis in the Draft EIR

An evaluation of geology, seismicity, faults, hydrogeology, slope stability, and other potential geologic hazards is included in Original Draft EIR Chapter 5, Geology and Hydrology. Appendixes C and D of the Original Draft EIR include detailed site-specific hydrogeologic and geotechnical investigations and these reports have been available for review by the public since July 10, 2014. The Proposed Project is designed to comply with the California Code of Regulations Title 27, as enforced by the Regional Water Quality Control Board, Los Angeles Region 4, which include siting criteria, seismic design standards, and containment system design and construction strategies to prevent impacts to surface water and groundwater resources. Specifically, Subsection 203700, Seismic Design, requires Class III facilities to be designed to withstand the maximum probable earthquake (MPE) without damage to the foundation or

the structures which control leachate, surface drainage, erosion, or gas. The MPE is the maximum earthquake that is likely to occur during an 100-year period. The MPE is determined based on criteria presented in California Division of Mines and Geology Note #43.

As part of static and seismic slope stability analyses for CCL by Golder (2012), Dr. Norman Abrahamson prepared an updated seismic hazard report for the site. The seismic hazard report is based on direction previously provided by the Regional Water Quality Control Board, requiring that permanent landfill slopes be designed to withstand the peak ground acceleration associated with the maximum credible earthquake standard, and interim landfill slopes be designed to withstand the peak ground acceleration having a 10 percent probability of exceedance in 5 years. The maximum credible earthquake standard that is applied at CCL is a higher standard than the MPE standard, the minimum required by Title 27 for Class III landfills, and has previously been used as the standard for design at CCL.

The engineering qualities of the onsite soil and bedrock materials were based on laboratory analyses of undisturbed representative soil/rock samples collected onsite during numerous geotechnical investigations over decades within the landfill. Original Draft EIR Section 5.4.2, Geotechnical Investigation, discusses the various geotechnical investigations that have been performed at CCL. Furthermore, the engineering competency of onsite soil and bedrock materials was visually observed in numerous exploratory borings and in road cuts within the landfill by a certified engineering geologist with 38 years of experience, including 30 years of experience on projects within the Santa Clarita/Castaia area. The laboratory testing of the onsite materials included shear strength tests, consolidation tests, and expansion tests.

#### **Saugus Formation Shear Values**

Saugus Formation cross-bedded shear strengths were based on laboratory analyses of several bedrock samples of the Saugus Formation collected onsite during geotechnical investigations of East Main Canyon, South Main Canyon, the landfill entrance road, and the Master Plan Revision. These shear strengths were documented in geotechnical reports issued in 2006, 2009, and 2012. The Los Angeles County Department of Public Works Geotechnical and Materials Engineering Division (GMED) reviewed the 2012 Master Plan Revision Report prior to release of the Draft EIR. Review of geotechnical reports for projects surrounding CCL (Parcel Map 18108, Parcel Map 26363, Parcel Map 19784, Vesting Tentative Tract Map 60678, and the extension of Franklin Parkway) indicate that the Saugus Formation cross bedded shear strength values used in stability analyses for static and seismic conditions are both realistic and verifiable. An equivalent Saugus Formation cross-bedding strength was recently recommended and approved by GMED for Vesting Tentative Tract Map 60678, located south and across the Santa Clara River from CCL.

#### **Potential Conflicts with Existing and Proposed Developments**

The Proposed Project does not conflict with existing developments. The proposed Landmark Village Development and the potential impacts of the Proposed Project and other nearby proposed developments have been evaluated throughout the resource chapters of the Draft EIR. Chapter 5 of the Original Draft EIR concludes that any potential for debris flow would be contained onsite as a result of project design. The housing developments and schools proposed for the area would not be at risk or "incompatible" with the Proposed Project. The EIR prepared for the proposed Landmark Village considered CCL in its evaluation of several resource areas, including noise, hydrology, air quality, solid waste, and environmental safety. CCL was not identified in the Landmark Village EIR as a concern regarding geology or seismic hazards. Potential geologic hazards are typically managed through site-specific engineering and mitigation.

Therefore, based on the Proposed Project design and site investigations described in Chapter 5 and summarized above, no additional mitigation beyond the measures listed in the Original Draft EIR are required or needed. Mitigation measures are not provided for catastrophic geological soils failure as this was not found to be a potentially significant impact.

For a discussion on the adequacy of the landfill liner and comments related to the 1994 Northridge earthquake, see Topical Response #14 “Landfill Liner System.”

#### **Review of Technical Documents**

With respect to the requested review of documents, the seismic and geotechnical analysis in the Original Draft EIR was based on the reports and documentation provided in the EIR. These documents have been available for public review, including Appendix C (Hydrogeologic Report for Chiquita Canyon Landfill) and Appendix D (Geotechnical Investigation for the Chiquita Canyon Landfill Master Plan Revision), since July 10, 2014.

# CCL Topical Responses

## 12. Greenhouse Gas Emissions and Climate Change

### Summary of Comments

Commenters on the Partially Recirculated Draft Environmental Impact Report (EIR) suggested that greenhouse gas emissions associated with the Proposed Project could be reduced by closing the Chiquita Canyon landfill and instead hauling waste by rail to the Mesquite Landfill. Several comments also asked for calculations of the emissions associated with rail haul to Mesquite Regional Landfill as compared to continued disposal at Chiquita Canyon Landfill (CCL).

### Response

The Partially Recirculated Draft EIR includes an analysis of Alternative F (Rail Haul Transport to Out-of-County landfills), which is predicated on a waste-by-rail system using the Puente Hills Intermodal Facility, other transfer stations, and the Mesquite Regional Landfill operated by the Los Angeles County Sanitation District and located in Imperial County. This analysis notes generally that the quantity of emissions depends on the origin of the waste being disposed, the number of trucks, and the distance of travel. The analysis in the Partially Recirculated Draft EIR was prepared at a necessarily general level of detail, as a proposed rail-haul system to Mesquite Regional Landfill that could be used as a basis for a detailed comparison does not yet exist. However, the following general conclusions can be made at this time:

- One of the substantial sources of greenhouse gas emissions for a new landfill project or a landfill expansion project is the methane that is generated by the disposed waste (Partially Recirculated Draft EIR, Chapter 12). This component of greenhouse gas emissions does not vary substantially based on the location of the landfill, assuming that similar mitigation measures are imposed to reduce emissions.
- The use of a rail-haul system linked to the Mesquite Regional Landfill may generate comparable emissions, or might generate greater emissions, due to the combination of truck haul and rail haul. Whether or not the truck emissions are greater depends on the source of the wastes and the location of the transfer station or other facility at which the wastes are loaded onto trains. Emissions that are associated with wastes originating in northern Los Angeles County or Ventura County would likely be greater with a rail-haul system, assuming that the materials recovery facility or other transfer facility is located further away. For example, if the Puente Hills materials recovery facility were to be used, that would increase the vehicle miles associated with each truckload of waste from the Santa Clarita area from approximately 18 miles roundtrip, to 96 miles roundtrip. Emissions from other parts of the County would in some areas be similar to the emissions associated with disposal at CCL, and in areas closer to the transfer facility, emissions would be reduced in comparison to disposal at CCL.
- Although rail emissions per unit are lower, with the use of long distance rail haul, those rail emissions would be added to the mix of regional truck emissions, which will tend to increase the overall emissions associated with a rail haul alternative.

- Generally, if there are more options for waste disposal, this tends to reduce greenhouse gas emissions associated with the transport of waste, as local jurisdictions have more options, and more options that are closer, than if there are few options.

For these reasons, it is likely that the impact conclusions for emissions associated with a rail-haul alternative will be similar to those for the Proposed Project, the same conclusion that was reached in the Partially Recirculated Draft EIR's analysis of alternatives.

# CCL Topical Responses

## 13. Household Hazardous Waste Facility

### Summary of Comments

General safety concerns were raised in connection with the Proposed Project's onsite Household Hazardous Waste Facility (HHWF). Other comments requested clarification on the operating hours of the HHWF.

### Response

Chiquita Canyon Landfill (CCL) will continue to accept all nonhazardous wastes permitted at a Class III solid waste disposal landfill, excluding sludge. The inclusion of an HHWF at CCL does not mean that CCL is accepting hazardous waste. In fact, the HHWF is a facility that will help to keep hazardous waste from being disposed at CCL, or otherwise improperly disposed. Although the HHWF will be constructed at CCL, this facility will be separate from CCL operation. The HHWF will be a joint effort between CCL and Los Angeles County. CCL will design and construct the HHWF. The facility may be permitted and operated by Los Angeles County or by a third party selected by the County. Operating hours for the HHWF will be 24 hours per day, 7 days per week, for purposes of processing materials, operating equipment, and/or maintaining the facility. Delivery of material to the HHWF by members of the general public will be limited to 6:00 AM to 8:00 PM, 7 days per week. However, actual operating hours for the HHWF would be set by Los Angeles County, and are anticipated to be one or two weekend days per month.

Although the HHWF will be located in the same area as the new landfill entrance and support facilities, the HHWF will be physically separate from CCL and will have its own entrance and exit off the landfill entrance road, separate from the gated entrance and exit to the landfill.

The HHWF will be staffed continuously during operation by an individual(s) trained in hazardous materials management. The operation of the HHWF will be in full compliance with federal, state and local laws and regulations. The HHWF will strive to collect and deliver material to its final destination by the end of each working week. Collected material will be documented and tracked to ensure it will be held on site for no more than 10 days. If the need to store material exceeds 10 days, the facility will be subjected to all applicable regulations required for a treatment, storage, and/or disposal facility (including permitting).

The HHWF will be constructed and permitted to receive the following general materials:

- Household Hazardous Waste: paint and solvents; used motor oil and filters, anti-freeze, and other automotive fluids; cleaning products; pool and garden chemicals; aerosol cans; all medicine except controlled substances; auto batteries; household batteries

To ensure the health and safety of the surrounding residents and staff, the HHWF will develop a Health and Safety/Operations Plan, as specified in Title 22, *California Code of Regulations* and Section 67450.25, which describes emergency responses to ensure that incidents do not occur, recur, or spread. It will also detail safety arrangements with local authorities. The HHWF will also incorporate additional safety and security measures such as security fence, cameras, alarm, fire protection and sprinkler systems as well as a covered receiving area and spill containment area.

The HHWF is considered a beneficial and complementary project to the landfill. Having a permanent HHWF for the community provides a means for this material to be diverted from the waste stream and lessen the risk of this material being illegally dumped in the environment. The HHWF will provide the following benefits according the U.S. Environmental Protection Agency:

- Reduction and recycling of household hazardous waste conserves resources and energy that would be expended in the production of more products
- Reuse of hazardous household products can save money and reduce the need for generating hazardous substances
- Proper disposal prevents pollution that could endanger human health and the environment

# CCL Topical Responses

## 14. Landfill Liner System

### Summary of Comments

Comments were received expressing concern about the past performance of the landfill liner during the 1994 Northridge Earthquake and the expected performance of the proposed liner. Commenters questioned how the liner can withstand an earthquake or other natural disaster. Commenters questioned how Chiquita Canyon Landfill (CCL) will be able to identify which parts of the liner are leaking in the event of a natural disaster and how residents will be informed of liner leaks. Commenters asked how the liner will be repaired, what is the cost, if there is enough emergency funding to repair the liner, and if there is a stronger and safer product on the market that can be used and if so, why it isn't being used.

### Response

#### Northridge Earthquake

With regards to the performance of the liner during the Northridge Earthquake, a comprehensive post-earthquake analysis performed by industry experts determined that the Northridge Earthquake caused two minor, isolated tears in the existing liner and that the integrity of the liner system was not compromised. Within two days of the earthquake, a field inspection was performed by the landfill's engineering consultant, accompanied by representatives of the California Integrated Waste Management Board, Los Angeles County Department of Health Services, and California Regional Water Quality Control Board (RWQCB). Following the field inspection, the engineering consultant performed a thorough evaluation of the incident, including field observation and mapping, conducting a field investigation to check the liner's integrity at various locations, reviewing available literature, obtaining information on the Northridge Earthquake, obtaining field samples, and performing laboratory testing. The evaluation determined that the two minor tears were located on the side slope near the top of the slope. In both instances, overlying soil was cleared away from the area of the tears and the tears repaired by a licensed geomembrane installer and covered with several feet of soil. Because the tears were located near the top of the side slope, the tears did not impair the ability of the liner to protect water quality. Based on the post-earthquake investigation and analysis, the *Northridge Earthquake Seismic Evaluation, Chiquita Canyon Landfill* report (EMCON, 1994) was prepared and submitted to the California Integrated Waste Management Board and RWQCB, Los Angeles Region. This report is available for review by the public, by request to either of the above-referenced agencies.

As discussed in the Northridge Earthquake Seismic Evaluation, the two minor liner tears were attributable to seismically induced settlement and were not related to slope instability. Vertical settlement on the order of 20 to 30 percent of the refuse thickness is known to naturally occur in landfills over time (EMCON, 1994). Dynamic forces, such as those due to earthquakes, may result in near instantaneous settlement. Movements of the refuse result in stresses that are transferred to the landfill liner. Depending on the properties of the liner, these stresses may result in direct tensile stresses being placed on the liner. The tears in the liner at CCL resulted from these tensile stresses.

Stresses in the liner due to refuse movement are often referred to as downdrag forces. Since refuse settlement occurs in a vertical direction, the downdrag forces affect the landfill side slopes rather than the landfill base. Also, since settlement occurs throughout the refuse mass and the magnitude of the

settlement is related to the underlying refuse thickness, it is intuitive that settlement measured at the landfill surface is the cumulative result of the settlement that occurs in each incremental thickness of refuse. As a result, the downdrag forces are least at the bottom of the landfill side slope, where the underlying refuse thickness is the least, and the greatest at the top of the landfill side slope, where the underlying refuse thickness is greatest. From this discussion of downdrag forces, it is apparent that any tearing of the liner would occur only near the top of the landfill sideslope where the refuse movement due to settlement is the greatest and the downdrag forces due to refuse movement are the greatest.

Settlement that occurs instantaneously may not allow the refuse and surface soil time to internally adjust to movements, and result in the type of surface soil cracking observed at CCL after the Northridge Earthquake. The tensile strain at which a geomembrane liner will tear is at least 15 times greater than the tensile strain at which soil will crack. Consequently, surface soil cracking delineates those areas where liner tears may have occurred. The site inspection and mapping that was performed after the Northridge Earthquake identified those areas where the surface soil was cracked. Where surface soil cracking occurred, the surface soil and underlying refuse were excavated to expose the liner. This effort did not identify any liner tears other than the two minor tears noted above. This result is consistent with the material properties of the surface soil, refuse, and geomembrane liner, the physical behavior of the landfill during an earthquake, and the engineering analysis performed after the earthquake.

The Northridge Earthquake Seismic Evaluation recommended a design change to introduce a slip plane, such as a geotextile, geonet, or similar surface, above the sideslope liner near the anchor trench to prevent strains in the refuse from transferring to the liner (EMCON, 1994). This change has been incorporated in module designs following the Northridge Earthquake.

### **Proposed Liner System**

During preparation of the Master Plan Revision, Dr. Norman Abrahamson updated the seismic hazard assessment for the site (November 2010). Dr. Abrahamson is a recognized expert in seismicity and was intimately involved in several of the studies following the Northridge Earthquake. The seismic hazard assessment update included seismicity and peak ground acceleration. As a result, the Master Plan Revision design is based on the most up-to-date information, including studies following the Northridge Earthquake.

The Proposed Project design reflects the results of detailed slope stability analyses based on the updated seismic hazard assessment for the site. It should be noted that the RWQCB's requirements for slope stability analyses are more stringent than that required by Title 27 *California Code of Regulations*, Waste Discharge Requirement (WDR) Order No. 93-062, the U.S. Environmental Protection Agency Subtitle D requirements, and WDR Order No. 98-086.

A liner system that meets or exceeds the RWQCB and regulatory standards will be constructed on the excavated base and side slopes of each future fill module. The specific liner system design for future modules will be determined during the detailed design of each module. The liner system design will be consistent with the design criteria developed for the landfill and regulatory requirements. The detailed designs and construction documents are prepared using current site characterization information based on geologic mapping of excavations, seismicity and peak horizontal ground acceleration data. The design of future liner systems will continue to include current design and engineering practices and standards and will be developed under the direction of a California-registered civil engineer and be approved by the RWQCB.

The liner system is also designed to contain liquid (leachate) that accumulates in the landfill and direct it to the leachate collection and removal system (LCRS). The LCRS is designed to withstand deformations of the foundation materials anticipated during the design earthquake so that any permanent

displacement of the foundation does not impair the integrity of the liner and LCRS. A soil layer, or approved alternative, termed the “operations layer,” is placed over the base liner and on the side slope liner to protect the liner system before waste is placed. The design of the LCRS will continue to be developed under the direction of a California-registered civil engineer.

Prior to construction of each fill module, a design report is prepared and submitted to RWQCB pursuant to *California Code of Regulations* Title 27 and WDR Order No. 98-086. The design report addresses module excavation, liner system design, and LCRS design. The design report includes a slope stability evaluation, pertinent design calculations, construction drawings, construction specifications, and construction quality assurance (CQA) plan.

The design report must be approved by the RWQCB before construction can begin. The CQA plan addresses the monitoring of geosynthetic materials, soil, and rock components of the liner system and LCRS during installation. The CQA plan also defines the extensive testing to be performed during construction to ensure the liner system and LCRS are constructed in accordance with the plans and specifications.

Construction monitoring and testing will be performed under the direction and supervision of a California-registered civil engineer or certified engineering geologist who will document that construction is performed in compliance with the applicable regulations, permits, and the CQA plan. At the completion of construction, a construction report is prepared documenting the construction activities, presenting the results of the CQA monitoring and testing, and certifying that the construction was in accordance with the plans and specifications and the CQA plan. The construction report is submitted to the RWQCB for review and approval. The construction report must be approved before waste can be disposed in a new module.

Following a natural disaster such as the Northridge Earthquake, the liner (and all other containment features of the landfill) would be inspected and if necessary repaired, as was done following the Northridge Earthquake in 1994. Any liner repairs will be performed consistent with good construction practice and will be monitored and tested consistent with the RWQCB-approved CQA plan. Based on the specific experience at this landfill following the Northridge earthquake, the cost of any repairs that might be required is not expected to be substantial or material in the context of the overall operation of the landfill and would be within the operating budget of the landfill. If the cost of repairs were found to be substantial or material in the context of the overall operation of the landfill, CCL’s parent company, Waste Connections, the third largest publicly traded waste management company in the United States, has sufficient resources to address the cost of repairs.

Please refer to Topical Response #10, Environmental Monitoring, for a discussion of how CCL will be able to identify potential leaks in the liner system and how residents will be informed of the leaks.

# CCL Topical Responses

## 15. Land Use

### Summary of Comments

Comments were received stating that the Proposed Project is in conflict with the Los Angeles County General Plan, the Santa Clarita Valley Area Plan, and the Castaic Area Community Standards District guidelines. Commenters stated that there are no mitigation measures in the Draft EIR, Chapter 4, Land Use, to address conflicts with the Los Angeles County Ordinance Title 26 in regard to a required 1,000-foot setback. It was stated that the Proposed Project is an incompatible land use with the pending Newhall Ranch Project developments that have planned structures that lie within 1,000 feet of the Chiquita Canyon Landfill (CCL) perimeter. It was stated that Los Angeles County has a duty to notify business owners and operators about the potential for their buildings to fall under the Methane Mitigation Standards if the Proposed Project is approved. Commenters stated that the County's land use objectives and policies include the protection of major landfill and solid waste disposal sites from encroachment of incompatible uses. It was stated that, at the rate of accepting 12,000 tons per day, CCL will compete with the largest landfill in the Nation, Apex Landfill in Las Vegas, which accepts approximately 10,500 tons of trash daily.

### Response

#### Compliance with Relevant Land Use Regulations

Land use impacts and compliance with relevant land use regulations are discussed in Draft EIR Chapter 4, Land Use. In a discussion of land use, the California Environmental Quality Act (CEQA) specifies that an Environmental Impact Report (EIR) identify if a project would physically divide an established community, be inconsistent with the plan designations of the subject property, be inconsistent with the zoning designation of the subject property, and conflict with other applicable land use criteria, such as hillside management or a significant ecological area. Draft EIR Chapter 4, Land Use, addresses these issues. Contrary to the comments above, the Proposed Project does not conflict with applicable plans. The Proposed Project does not change the current use of the subject property nor the zoning of the subject property and does not represent impacts related to land use. Los Angeles County has found the Proposed Project to be consistent with existing and proposed future land uses. Further, the Board of Supervisors found in 1997 that the landfill was consistent and compatible with surrounding land uses. No mitigation measures are required regarding the Proposed Project.

#### County Building Code and Methane Mitigation Standards

The Proposed Project does not conflict with Title 26 of the Los Angeles County Ordinances (the Los Angeles County Building Code Ordinance). Title 26, Ordinance 110.3 (which together with Ordinance 110.4 comprises the County's "Methane Code") imposes a requirement on developers of new developments near existing landfills, to avoid inappropriate encroachment of residential development upon a landfill. The requirement applies to new buildings or structures within 1,000 feet of a landfill. If the fill is not isolated by an approved protective system, the new structure or building must be designed according to the recommendations of a licensed civil engineer. The 1,000-foot provision identified by the commenters is not applicable, because the current and future waste footprint at CCL is isolated by an approved artificial protective system. Draft EIR Chapter 2, Project Description, Section 2.2.8.2, Liner System, provides a discussion of the liner of the waste footprint at CCL that "meets or exceeds the

standards of Title 27 California Code of Regulations 20340 (Title 27), Waste Discharge Requirement Order No. 93-062, implementing U.S. Environmental Protection Agency Subtitle D requirements, and Waste Discharge Requirement Order No. 98-086."

Los Angeles County has provided information and ways to implement Methane Mitigation Standards through the Los Angeles County Department of Public Works' website.<sup>1</sup> The Los Angeles County Department of Public Works, Building and Safety Division is the lead agency for this program, and the program is part of the County Building Code. In addition, the County has provided public notification of the Proposed Project in accordance with the requirements of the CEQA.

#### Cumulative Impacts

Concerns regarding cumulative project impacts are addressed via CEQA, through an analysis of potential cumulative projects in the same vicinity and timeframe of a proposed project, such as the Newhall Ranch developments. Each of the resource area discussions in Draft EIR Chapters 4 through 15 address potential impacts to both existing receptors (residential neighborhoods), as well as future receptors (cumulative projects). The cumulative projects (identified in Draft EIR Chapter 3, General Setting and Resource Area Analysis), do represent changes to the current use of the land and potentially to the zoning of that land. Therefore, it is reasonable to state that the Proposed Project would not incrementally contribute to cumulative changes to land use, although cumulative changes to surrounding land uses are anticipated. Notably, there has been substantial growth in the surrounding area while the landfill has been in operation (over the last 40 years). Topical Response #7, Cumulative Impacts, contains additional information on the issue of cumulative impacts.

#### Comparison of Landfills

The Draft EIR discusses the potential environmental impacts associated with a waste acceptance rate of 12,000 tons per day at CCL. A comparison of CCL with other landfills across the country is not pertinent to a discussion of the potential environmental impacts of the Proposed Project.

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<sup>1</sup> <https://dpw.lacounty.gov/epd/swims/OnlineServices/methane-mitigation-standards.aspxat>

# CCL Topical Responses

## 16. Noise

### Summary of Comments

Comments related to noise include concern regarding the noise analysis, the permitted hours and days of operation, the plans and procedures in place to mitigate noise impacts, a request to complete a survey, and clarification about the frequency of the equipment maintenance.

### Noise Analysis Comments

It was suggested that the noise analysis be recalculated since the current disposal intake is approximately 3,000 tons per day, which would be four times what is currently taken in and not double. It was claimed that this would result in four times the noise level of today. It was suggested that measurements of actual landfill operating activities sometime after 2011 should be included, not 2005 due to the fact that 9 years have passed. The commenter stated that the increase of 3 A-weighted decibels would be in question since current noise measurements have not been used. It was suggested that atmospheric absorption also be included in the analysis. Clarification was requested that the nearest house is 500 feet, but it is 1,200 feet from the landfill when defining the construction phase. It was noted that the truck traffic will be four times what it is today and that it is already significant, therefore to state that it will be less than significant is less than honest.

### Noise Analysis Response

Sound at CCL fluctuates over time and is function of the level of onsite activities. The noise studies for CCL were conducted during a period of time when the landfill was operating at or near its permit limit of 6,000 tons per day (5,863 tons per day on August 15, 2005) and included noise measurements during these operating conditions. Given the logarithmic nature of noise, a doubling of sound sources does not result in a doubling of the noise level. When the number of sound sources double, the sound level attributable to those sources increases by 3 decibels (dB). The 3-dB change is considered barely detectable by the human ear, while a 10 dB change is perceived as a doubling or halving in perceived loudness<sup>1</sup>. The 2005 measurements of landfill operations are representative of the sound when the facility is operating at or near the existing 6,000 tons per day permit condition and are the basis of the calculations and analysis. Atmospheric absorption will vary based on the distance from the noise source to the receiver. For a sound frequency of 500 hertz (which falls between the musical notes of B4 and C5) the reduction is approximately 0.24 dB per 100 meters (328 feet).

Environmental Impact Report (EIR) Section 2.1, Location, states: "The closest of these residential dwellings is located approximately 500 feet from the northwest site boundary and 1,200 feet from the landfill footprint..." In this location, construction activities would not occur at the landfill boundary, but rather at the landfill footprint. EIR Section 13.5.2.1, Construction states, "At its closest point, the landfill construction activities are approximately 1,200 feet from the closest residential area (represented by Site 1, Val Verde)." In addition, Section 13.5.2.2 of the EIR notes "truck and other vehicular traffic to and

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<sup>1</sup> U.S. Department of Transportation Federal Highway Administration. *Highway Traffic Noise Analysis and Abatement Policy and Guidance*.

[https://www.fhwa.dot.gov/environment/noise/regulations\\_and\\_guidance/polguide/polguide02.cfm](https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/polguide/polguide02.cfm). Accessed December 8, 2016.

from the landfill will use SR-126. CCL-generated traffic is, and will continue to be, a small percentage of total vehicle volume on SR-126..." This statement is based on the findings of Appendix G, Traffic Analysis, included in the Original Draft EIR. In addition, State Route (SR) 126 is over 1 mile away and on the opposite side of a significant ridgeline from Val Verde.

### **Operating Hours Comments**

A comment was received stating that the Draft EIR incorrectly lists the permitted hours/days of operations. The comment stated that the existing Conditional Use Permit (CUP) does not allow the landfill to operate 24 hours per day and that Chiquita Canyon Landfill (CCL) is never allowed to operate on "up to four Sundays during quarterly Val Verde cleanup days." It was stated that the days are Saturdays and this should be fixed in the Draft EIR. The commenter also stated that the CUP does not allow composting activities to occur 24 hours per day, 7 days per week. It was claimed that the closing of the landfill every night was not maintained for 184 24-hour periods in 2012 and that the 184 times that CCL operated 24 hours was unknown to Val Verde residents until now. The commenter claimed that no such agreement allows such activity. Commenters asked for clarification on whether construction will only be during the day and to list all construction activities along with the machinery which would result in a noise disturbance during any given day. Commenters also requested that a schedule be provided that will be enforced for heavy equipment, including operation hours for each piece of heavy equipment.

### **Operating Hours Response**

The following conditions in the current CUP for CCL address the permitted operating hours of the landfill:

- Condition 9h of CUP No. 89-081(5) states: "Operating hours may be 24 hours per day, 7 days per week, except that, other than as provided in Condition 20i, the landfill shall not accept refuse for disposal from 5:00 p.m. on Saturdays through 4:00 a.m. on Mondays."
- Condition 12 of CUP No. 89-081(5) states: "This grant allows the establishment and operation of a composting facility, using either windrow or in-vessel technology, together with certain ancillary and related activities as enumerated herein, subject to the following restrictions as to use." Condition 12f of CUP No. 89-081(5) states: "Operating hours may be 24 hours per day, 7 days per week."
- Condition 20i of CUP No. 89-081(5) states: "The landfill operator shall provide four free quarterly clean-up days to residents of Val Verde, showing proper identification and proof of residence at the landfill entrance. These days may be Sundays."

Also, the Board of Supervisors in its 1997 Findings approving the existing CUP, specifically disclosed and referenced the 24-hour operation of the landfill (paragraph 3 of the Findings).

Original Draft EIR Section 2.2.6, Landfill Construction, states, "Construction working hours would generally be daylight hours between 7:00 a.m. and 7:00 p.m., Monday through Saturday."

Because of the methodology used to conduct the noise analysis (doubling the noise associated with 6,000 tons per day), it is not necessary to list all construction activities, along with the machinery which would produce noise. However, Table 13-3 (Noise Chapter of the Final EIR) lists types of construction equipment typically used at CCL and their associated noise levels. Further, Appendix H-2 of the Final EIR (Air Quality Emission Calculations) lists the type and number of construction equipment to be used for entrance and cell construction activities, including hours of operation for each piece.

### **Plans, Procedures, and Surveys Comments**

Comments were received requesting clarification on the procedures in place to measure noise level at CCL on a daily/hourly basis. The procedures to measure escaping noise levels for the residents closest to the landfill; and the procedures and equipment used if noise abatement measures are needed when and if the project exceeds the requirements. A commenter asked that CCL include a plan for 24 hours on any operational day. It was requested that the plan list the enforcers that will be responsible to ensure that construction activities which result in a noise disturbance are prohibited between the hours of 7:00 p.m. and 7:00 a.m., or at any time on Sunday. It was also suggested that a mitigation plan be included for residents who are awakened by the operations' activities.

A commenter requested that a noise survey be mailed and maintained for residents within 1,000 feet of the landfill. It was noted that the natural barrier currently does not stop the sound and that during the Val Verde Civic Association meetings, residents have complained of noise emanating from the landfill during sleeping hours. A commenter asked when short-term noise level measurements were conducted as residents are unaware of any such testing.

### **Plans, Procedures, and Surveys Response**

The Original Draft EIR concludes that the Proposed Project noise levels are less than significant and that the County of Los Angeles noise requirements are satisfied. The applicable regulations do not require continuous monitoring of project sound levels nor do they require sounds from a project to be inaudible. As stated in Section 13.4.4 the sound levels were measured on September 15 and 16, 2005, as shown in Appendix I of the Original Draft EIR. The sound levels at Site 2 note that SR-126 was the dominant sound source. This does not represent an exceedance of the applicable regulations by CCL.

Noise abatement measures would be specific to the activity or equipment that results in an exceedance. No exceedances are predicted and it would be speculative to identify potential future noise abatement measures. Concerns regarding actual sound levels violations of the County noise ordinance would be investigated by Los Angeles County when and if they arise.

With regard to the request for a noise survey, conclude that impacts are less than significant and this request is not warranted.

Finally, as the noise analysis concludes that the Proposed Project would result in less than significant impacts, there is no requirement to develop a mitigation plan based on speculation that there will be residents who might be awakened in the future. CCL would comply with Los Angeles County's noise ordinance. Partially Recirculated Draft EIR Section 2.2.6, Landfill Construction, states, "construction working hours would generally be daylight hours between 7:00 a.m. and 7:00 p.m., Monday through Saturday, and construction activities would conform to the County's noise ordinance." As stated above, concerns regarding actual sound levels violations of Los Angeles County noise ordinance would be investigated by the County.

### **Equipment Maintenance Comments**

A comment was received requesting clarification on the landfill's definition of "as needed" related to equipment maintenance, and that for some it is monthly/weekly, or when it breaks down.

### **Equipment Maintenance Response**

"As needed," with regard to maintenance of landfill equipment, includes as recommended by the manufacturer, as well as in case of equipment malfunction or break down.

# CCL Topical Responses

## 17. Odor

Comments were received on the sources of odor at Chiquita Canyon Landfill (CCL), odor impacts associated with the existing landfill and the Proposed Project, the approach used in the evaluation of odor impacts, the impact of elevation on potential odor impacts, and the implementation and enforcement of odor control and mitigation measures at CCL. Commenters also requested that odor control measures used at Sunshine Canyon Landfill be implemented at CCL.

### **Response**

The potential for odor impacts as a result of the Proposed Project was evaluated in Chapter 11, Air Quality, of the Original Draft Environmental Impact Report (EIR). As a result of comments received on the Original Draft EIR, the air quality chapter was revised and included in the Partially Recirculated Draft EIR. The revised chapter included an expanded discussion of potential odor impacts, including current odor data and associated information on wind patterns in the vicinity of CCL and a discussion of the proposed mixed organics processing/composting facility. The sections below both summarize the odor discussion included in the Partially Recirculated Draft EIR and directly respond to comments received related to odor.

### **Odor Impact Methodology**

The revised air quality chapter of the Partially Recirculated Draft EIR uses an odor impact assessment approved for use by the SCAQMD. Because SCAQMD does not have its own odor methodology, the revised air quality chapter uses the methodology used by the Bay Area Air Quality Management District (BAAQMD). BAAQMD California Environmental Quality Act Air Quality Guidelines recommend reviewing odor complaints from the past 3 years for the source in question. BAAQMD considers a source to have a substantial number of odor complaints if the complaint history includes five or more confirmed complaints per year averaged over a 3-year period (Chapter 11, Section 11.5.5).

### **Local Wind Patterns and Correlation to Odor Complaints**

Section 11.5.2, Local Wind Patterns, of the Partially Recirculated Draft EIR described wind patterns in the vicinity of CCL. Because wind patterns can change greatly, particularly around a steep-sided canyon such as that at CCL, data from wind monitoring equipment located on the western boundary of CCL were used to evaluate local wind patterns, specifically for evaluating the potential for offsite odors. Three consecutive years of wind data from the CCL wind monitoring equipment (2012 through 2014) were available for use in the odor analysis. Local wind roses were developed for the available CCL data (Partially Recirculated Draft EIR, Figure 11-3).

A review of the local wind patterns showed that generally, the wind roses plotting the local wind data from CCL show local winds blowing primarily from west to east during the daytime and summer months and light winds from northeast and east during the nighttime, with winds blowing infrequently toward the community of Val Verde.

For the time period of August 2012 through August 2015, 23 verified odor complaints, as documented by South Coast Air Quality Management District (SCAQMD), occurred on a total of 11 days during this 37-month time period. Additionally, CCL received a Notice of Violation (NOV) for odor on 1 additional day, for a total of 12 confirmed odor events over a 37-month period, or an average of 3.9 odor complaints (categorized as odor events) per year. Among the recent verified odor complaints by

SCAQMD, specific complaint times were available for four odor events. Wind data for these times were obtained from the CCL monitoring station, with the intent to evaluate the correlation between the monitored wind conditions and the odors reported and verified at Val Verde.

The review of local wind patterns and verified odor complaints show that when verified odors have occurred, they appear to be correlated to light winds blowing toward the community of Val Verde. According to the CCL wind rose depicted in Figure 11-3a of the Partially Recirculated Draft EIR, winds blow toward the community of Val Verde approximately 9 percent of the time. Light winds toward Val Verde occur approximately 6 percent of the time. Currently, according to the Bay Area Air Quality Management District California Environmental Quality Act Air Quality Guidelines for odors, CCL does not have a significant odor impact on receptors.

### **Odor Sources**

Sources of odors at CCL and odor control best management practices for landfilling and best management practices and mitigation measures for composting activities at CCL are addressed in the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR. The revised chapter describes the results of odor impact analysis for operation-related sources associated with the Proposed Project, including composting operations and future cumulative impacts. CCL currently employs and will be required to implement progressive and aggressive odor management strategies.

### **Odor Management**

Best operating practices for management of aerobic sources of odor at CCL are described below:

#### **Best Operating Practices – Source Control**

- The most effective method used to control odors associated with incoming trash is CCL's waste exclusion program. CCL can and does refuse to do business with customers or potential customers who generate highly odorous loads. See also Topical Response, #29b, Waste Screening and Acceptance Program.
- CCL rejects trucks at the scales when there is an obvious highly odorous load.
- CCL selectively chooses to exclude trash loads from specific locations and on specific days of the week if there is a history of odorous loads.
- If a highly odorous load is detected while unloading, that waste is immediately covered to control odors.

#### **Best Operating Practices – Disposal**

- The size of the working face expands to accommodate disposal demand peaks, but then "shrinks" when demand subsides to minimize odors.
- The "shrinking" is achieved by covering the working face regularly throughout the day.
- As needed, CCL covers portions of the working face multiple times during the day to minimize the surface area of exposed trash and potential odors.
- CCL regularly exceeds state minimum standards and textbook rules-of-thumb for the use of soil and other beneficial use material to cover trash and other areas of the landfill. This is done to proactively minimize odors from fresh trash. See "Minimizing Odors with Beneficial Use Materials", for more information.

- CCL has a perimeter odor control system, which consists of a meteorological station located on the western boundary of the landfill that provides real-time information on wind speed and wind direction, plus a perimeter misting system over 1 mile long attached to the litter fence located along the western and northern boundaries of the waste disposal area. When the combination of weather conditions and odorous loads have the potential to result in offsite migration of odors, CCL disperses odor neutralizing agents through the nozzles.
- CCL utilizes large portable fans that can move nearly 1 million cubic feet per minute of air to help control the direction of air flow and to dilute and disperse odors generated at the tipping area.

### **Management of Anaerobic Sources of Odor**

To prevent the release of odorous gases from anaerobic digestion, an extensive gas collection and control system (GCCS) has been installed at CCL. The collected landfill gas (LFG) is either used as fuel in the onsite power plant (LFG-to-energy plant) or combusted in a LFG flare. Landfill surfaces are monitored regularly for evidence of gaseous emissions. When emissions are detected, they are corrected by adjusting the GCCS, or recompacting the cover soils, or both. Proper maintenance of the soil cover (e.g., repairing cracks), application of a combination of daily cover, intermediate cover, and final cover to provide a beneficial improvement in ongoing LFG collection efficiency, and efficient operation of the GCCS are also effective at controlling LFG odors.

CCL typically installs LFG collection wells 6 months to 2 years before the landfill starts collecting gas. This early installation removes the guess work of when to install more wells. When routine monitoring indicates the need for additional gas collection, the collection wells are simply turned on, proactively controlling gas and resulting odors before odors are detected.

CCL's LFG collection system is addressed by a Title V Permit to Operate issued by SCAQMD. The Title V permit includes specific conditions/mitigation measures with which CCL must comply. Conditions 22 and 23 of the Title V permit address odor from construction of the LFG collection system, and require mitigation measures to be implemented if odors during construction of the LFG system are detected beyond the property line.

### **Minimizing Odors with Beneficial Use Materials**

CCL contracted with Blue Ridge Services to investigate the relationship between the use of beneficial use materials and compliance. A full discussion of the Blue Ridge Report is included in Topical Response #34, Beneficial Use. With regard to odor, the Blue Ridge Report concludes that an increased use of beneficial use material correlates to a decreased number of environmental compliance incidents, including odor. Put differently, the more material a facility diverts from the landfill and uses for beneficial use, the more likely it will be in compliance with Title 27 regulations regarding nuisances, including odor nuisances. One of the most effective solutions to manage odor at a landfill is adequate soil cover (or alternative daily cover). CCL proactively places adequate soil and alternative daily cover on the landfill surfaces, including the active face, on a frequent basis. In some cases, the active face may be partially or fully covered more than once per day. Additionally, the placement of wood chips and/or green waste mulch on the landfill surfaces may help reduce odor emissions by acting as a bio-filter. Please see Topical Response #34, Beneficial Use, for additional information.

### **Odor Investigation at CCL**

As described in Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, Soil/Water/Air Protection Enterprise (SWAPE) conducted an Odor Survey in the spring and summer of 2015 at CCL to characterize and understand the various odors in and around CCL (SWAPE, 2015). The entire SWAPE Report is included in Appendix H-5 of the Final EIR.

Three trained odor specialists conducted odor sampling on 25 separate days, generally between the hours of 6 a.m. and 10 a.m., when odors have been reported to be the most common. Sampling events took place on Tuesdays, Wednesdays, Thursdays, and Fridays between April 7, 2015, and July 16, 2015. During each sampling event, 50 to 51 locations were sampled, for a total of 3,789 data points.

Locations were selected to give a thorough geographic distribution of sampling points, including potential receptors such as the Val Verde community. Locations were grouped into 14 location groups inside the landfill and offsite in the surrounding communities.

Odors were described using the following methods: dilution to threshold values to quantify the strength, hedonic tone to quantify the pleasantness, odor descriptors to describe the odor, and suspected odor source to describe whether the odor came from the landfill or elsewhere. Analysis of these parameters showed that the landfill working face had the strongest and most unpleasant odors. Offsite, odors were much weaker and were generally neutral in hedonic tone.

Odors were strongest within the landfill property, specifically at or near the working face. The most common odors detected within the landfill were smells of grass, sage, and other plants, the sweet air freshener smell of the odor control system, rotten and sour trash odors, and musty mulch odors. Trash odors were only detected within the landfill at locations other than the working face when weather conditions were hot, with low or calm winds. However, even during these conditions, trash odors were only rarely detected.

Outside the landfill, odors (regardless of source) were often not detected. In fact, 40 percent of offsite sampling data points contained no odors. Trash odors were rarely detected outside the landfill. Some of these detections were determined not to be landfill-related due to confounding sources of odor, and others were too faint to detect when diluted. Specifically, odors potentially related to the landfill were detected offsite 34 times out of 2,025 offsite sampling data points, or 1.68 percent of the time. The SWAPE Report concludes that because of the small detection rate of landfill-related odors offsite, the landfill does not create significant odor impacts to the surrounding communities (SWAPE, 2015).

### **Odor and Elevation**

The potential for increased odors as a result of increased landfill elevation was addressed in the revised air quality chapter of the Partially Recirculated Draft EIR. The discussion under Impact AQ-8 states the following:

...the Proposed Project would include both a horizontal and vertical expansion of the existing footprint of the landfill. A horizontal extension of the waste footprint would not be expected to result in increased odors because the working face would continue to be covered at least daily. Similarly, while it might seem that a vertical extension of the waste footprint would result in increased odors for nearby receptors, the opposite typically would occur. When the terrain surrounding a landfill is at a higher elevation than the odor sources, as is the case at CCL, larger impacts are seen right at the project boundary, as potential odor plumes do not have the time or buoyancy to elevate before reaching receptors. And as the elevation of the potential odor source increases, potential odor plumes are likely to be found further downwind, which provides more time for odors to disperse in the ambient air, leading to reduced impacts.

### **Compliance Related to Odor**

To address potential odor impacts, a Mitigation, Monitoring, and Reporting Plan, including the mitigation measure to implement an Odor Impact Minimization Plan for the mixed organics process/composting facility, will be implemented and enforced by the lead agency, the Los Angeles

County Department of Regional Planning, as part of the Conditional Use Permit. The lead agency is responsible to work with the SCAQMD to manage and enforce odor control and mitigation measures.

### **Odor Control at Sunshine Canyon Landfill versus CCL**

It is well known that Sunshine Canyon Landfill (Sunshine Canyon) has been experiencing odor issues and that a variety of odor management strategies have been implemented at Sunshine Canyon, with varying degrees of success.

Between 2011 and the First Quarter of 2016, Sunshine Canyon received 156 NOVs for creating a public nuisance related to odor. For that same period of time, CCL received 1 NOV, related to a particularly odorous load of green waste.

As described above, and in Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, odors may be the result of either aerobic or anaerobic decomposition of wastes. Site characteristics, such as geography; site infrastructure; and site management all factor into whether odors are noticeable outside the facility boundary and may result in a public nuisance. As a result, odor management is site-specific, and what is needed or effective at one site may not be needed or effective at another. For this reason, implementing odor strategies from Sunshine Canyon without consideration of site-specific conditions, is not necessary or appropriate for CCL.

The Blue Ridge Services Report, discussed above and in Topical Response #34, Beneficial Use, documents a positive correlation between increased tons of beneficial use material and reduced compliance issues. Similarly, the use of less beneficial use material correlates to a higher level of compliance issues. It should be noted that while CCL does not currently have a limit on the amount of beneficial use material it can use onsite, Sunshine Canyon is permitted to receive the lowest amount of beneficial use material of the Los Angeles County landfills evaluated.

### **Odorous Load Training Program**

In response to the NOV that CCL received in 2014 for an odorous load of green waste material, SCAQMD required that CCL develop and implement an Odorous Load Training Program, which SCAQMD reviewed and approved.

The Odorous Load Training Program, which has been added to the Final EIR as Appendix K, describes procedures for odorous load acceptance, odorous load training activities, CCL procedures for odorous waste loads, and training certification forms.

In response to this single NOV, and since implementation of the Odorous Load Training Program, CCL has demonstrated that it can respond quickly to odor issues, and successfully mitigate offsite odor migration.

### **Odor Impact Minimization Plan**

In response to comments received on the Draft EIR by SCAQMD and others that request that the Proposed Project have mechanisms in place to quickly address odor complaints and issues, CCL will develop an Odor Impact Minimization Plan (OIMP) for landfill operation. The OIMP will describe an odor monitoring protocol, a description of meteorological conditions that affect migration of odors, a complaint response protocol, a description of design considerations for minimizing odors, and a description of operating procedures for minimizing odors. Development and implementation of an OIMP for landfill operation has been added to the Mitigation Monitoring and Reporting Plan for the Proposed Project, included in Volume 2 of the Final EIR.

**Odors and Connection to Public Health**

Detection of odors and responses to them can vary substantially between individuals. While odors can be a community nuisance, and the detection of odors can be an indication of uncontrolled gaseous emissions from landfill operations, odors generally are not a reliable indicator of potential exposures or health risks from substances in air.

# Topical Responses

## 18. Project Alternatives

### Summary of Comments

Comments were made regarding the adequacy of the Original Draft Environmental Impact Report's (EIR) analysis of project alternatives. It was recommended that the EIR more clearly explain the conclusion that none of the selected feasible Proposed Project alternatives would reduce environmental impacts from the Proposed Project below that which is proposed in the Preferred Project. It was stated that the Proponent describes the Proposed Project's objectives in such a way as to make alternatives infeasible, then fails to discuss alternatives that would otherwise be feasible. It was noted that such objectives purposely eliminate alternatives that would reduce impacts to the environment and/or reduce health and other impacts to Val Verde. Comments were raised that by not considering a no project alternative or a smaller capacity alternative, the Proposed Project is proposing all or nothing. It was noted that the Draft EIR discusses the air quality impacts to the South Coast Air Basin as a whole and does not address the comparative air quality impacts to the proposed expansion on the Val Verde, Live Oak, and the approved Newhall Ranch Specific Plan versus the air quality impacts to residences from a more remote alternative site. It was stated that more information is needed in the description of the alternative site. Finally, it was requested that the EIR discuss the impacts on the proposed Chiquita Canyon Landfill (CCL) expansion of the full development of the Waste-by-Rail System to the Mesquite Regional Landfill by the County Sanitation Districts of the Los Angeles County.

### Response

The Project Alternatives chapter included in the Original Draft EIR considered five alternatives. Three alternatives were analyzed, while two alternatives were considered but eliminated.

In response to the varied comments received on the Original Draft EIR Project Alternatives chapter, the Project Alternatives chapter was revised and updated. The recirculated Project Alternatives chapter considers six alternatives: the three alternatives analyzed in the Original Draft EIR, the two alternatives previously considered but eliminated, plus one new reduced-size project alternative. The alternatives evaluated in the Partially Recirculated Draft EIR are listed below:

- Alternative A: No Project
- Alternative B: Continued (Status Quo) Operation with 0% Increase of Daily Waste Disposal Tonnage
- Alternative C: 50% Reduction of Proposed Additional Daily Waste Disposal Tonnage
- Alternative D: Waste Reduction and Alternative Technologies
- Alternative E: Alternative New Site in Northern Los Angeles County
- Alternative F: Rail Haul Transport to Out-of-County Landfills

These alternatives have been evaluated for potential environmental impacts, feasibility, ability to meet Proposed Project objectives, and ability to reduce the potentially significant impacts of the Proposed Project. Site plans and visual simulations for each of the onsite alternatives have also been prepared and are provided at the end of the revised Project Alternatives chapter.

The revised Project Alternatives chapter found that while some of the evaluated alternatives would meet some or most of the objectives of the Proposed Project or would reduce the potential severity of one or more potential impacts, none of the evaluated alternatives would reduce the potentially significant impacts of the Proposed Project. Table 18-2 in Chapter 18 provides a comparison of the level of significance of potential environmental impacts for each alternative compared to the Proposed Project.

### **Requirements of CEQA**

The following information is provided for clarification to the readers as to the extent of analysis required by CEQA when analyzing project alternatives in an EIR.

As stated in the Partially Recirculated Draft EIR, Chapter 18, Project Alternatives, Section 15126(d) of the *California Environmental Quality Act (CEQA) Guidelines* requires an EIR to describe a range of reasonable alternatives to the Proposed Project, or to the location of the project, which could feasibly attain *most of the basic project objectives* while also avoiding or substantially lessening any of the significant environmental effects of the project identified in the EIR. A “rule of reason” governs the range of alternatives to be evaluated in the EIR, and specifies that an EIR should only discuss those alternatives necessary to allow a reasoned choice by decision makers. Of those alternatives considered, an EIR need examine in detail only those the lead agency determines could feasibly attain most of the basic objectives of the project. “Feasible” is defined by CEQA Section 21061.1 to mean an alternative capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors. In determining the feasibility of an alternative, the EIR evaluation must consider several factors including site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the project applicant can reasonably acquire, control, or otherwise have reasonable access to an alternative facility or proposed alternative site. In the case of a private applicant (i.e., not a public agency with eminent domain powers), the applicant does not have the power of eminent domain and cannot acquire the property of others for its intended use. Thus, absent other factors, an EIR is not required to evaluate and study potential offsite alternatives not owned or controlled by an applicant. Although not required by CEQA, the recirculated Alternatives chapter includes a detailed analysis of two off site alternatives. Section 18.3.4 of the Partially Recirculated Draft EIR evaluates Alternative E: Alternative New Site in Northern Los Angeles County and Section 18.3.5 evaluates Alternative F: Rail Haul Transport to Out-of-County Landfills.

### **Project Objectives**

While the purpose of the Proposed Project is focused on the continued operation of CCL, most of the basic project objectives are written broadly enough as to not exclude the evaluation of feasible alternatives. The Proposed Project objectives are:

- To support Los Angeles County’s goal of maintaining adequate reserve (excess) landfill capacity to ensure the disposal needs of the County are met (LACDPW, 2015)<sup>1</sup>
- To support the Los Angeles County’s goal of managing the County’s waste disposal needs, which specifically includes expansion of Chiquita Canyon Landfill (LACDPW, 2015)

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<sup>1</sup> County of Los Angeles Department of Public Works (LACDPW). 2015. *County of Los Angeles Countywide Integrated Waste Management Plan 2014 Annual Report, Countywide Summary Plan & Countywide Siting Element*. December.

- To support the Los Angeles County's goal to provide solid waste disposal without interruption to protect the public health and safety as well as the environment (LACDPW, 2015)
- To mitigate constraints that may limit the accessibility of Class III landfill capacity within the planning period of the most current Countywide Integrated Waste Management Plan (LACDPW, 2015)
- To provide environmentally sound, safe, commercially and technically feasible, and cost-effective solid waste management solutions through continued operation and development of the existing CCL facility
- To prevent premature closure of the landfill with underutilized remaining airspace capacity
- To provide a site that could accommodate future waste conversion technology solutions
- To provide a site to accommodate processing of organic waste
- To provide a site for a permanent household hazardous waste facility (HHWF)
- To continue to provide landfill waste diversion programs that are relied upon by many local cities and communities in achieving state mandates for waste diversion

In accordance with CEQA, the project objectives of the Proposed Project were considered in selecting alternatives for evaluation and comparison to determine whether such alternatives can feasibly attain most of such objectives.

#### **Impacts to Val Verde and Live Oak**

The EIR prepared for the Proposed Project evaluated potential environmental impacts that could apply to the communities of Val Verde and Live Oak as well as those that could apply to the vicinity in general and region at large. Likewise, the evaluation of project alternatives considered whether smaller onsite alternatives, or offsite alternatives, would result in a change to potential impacts.

#### **Alternative Landfill Project Design**

The Proposed Project is not "all or nothing." The Original Draft EIR discussed the potential of an alternative landfill design in Section 18.3.2 and also discussed a No Project Alternative (Alternative A) in detail in Section 18.4.1 (see response below). The Original Draft EIR determined that in the context of CCL, any alternative restricting the landfill operator from obtaining a substantial amount of additional disposal capacity (i.e., an areal expansion) would not meet most of the project objectives and, thus, would not be considered feasible. Section 18.3.2 of the recirculated Project Alternatives chapter includes a comprehensive analysis of two on-site alternatives (Alternatives B and C) that would permit less daily waste disposal tonnage when compared to the Proposed Project. Alternative B is a Continued Operation (Status Quo) with 0% Increase of Daily Waste Disposal Tonnage alternative, which would be continued operation of the existing landfill at 6,000 tons per day. Alternative C would reduce the proposed amount of increased daily waste disposal tonnage by 50 percent, from 6,000 tons per day to 3,000 tons per day, for a total of 9,000 tons per day. Table 18-1 provides a comparison of the Proposed Project to the onsite alternatives. The analysis concludes that neither Alternative B nor C, avoid nor substantially lessen the effects associated with air quality or greenhouse gasses and climate change, or other potential environmental impacts, when compared to the Proposed Project. While these alternatives would reduce the severity of potential local air quality impacts, the overall impacts would remain significant and unavoidable. Based on the South Coast Air Quality Management District's recommended methods for evaluating potential air quality impacts, any sized landfill expansion would result in a significant and unavoidable air quality impact due to the combined emissions during

construction and operation. Furthermore, these alternatives also only partially meet the objectives of the Proposed Project.

### **No Project Alternative**

CEQA requires that an EIR consider the No Project Alternative. Section 18.3.1 of the recirculated Project Alternatives chapter includes a comprehensive analysis of Alternative A: No Project. The No Project Alternative is no approval of an expansion of the existing CCL, resulting in the cessation of waste receipts and consequent closure of the existing landfill operations. The current Conditional Use Permit (CUP) expiration date is 2019. However, in July 2016 the facility reached its permit-based disposal limitation of 23 million tons established in the current CUP. CCL is currently operating under a limited operational waiver issued by the Los Angeles County Department of Regional Planning, described in Section 1.2.2 of the Partially Recirculated Draft EIR. The limited waiver allows CCL to continue operation under the current CUP as long as the landfill and County are actively engaged in pursuit of a new CUP. The limited waiver is scheduled to expire on July 31, 2017, but the waiver will cease to be in effect at an earlier date if a final action is taken to approve or deny the pending CUP, if the pending CUP application is withdrawn, or if the waiver is revoked by the Director of Planning. In such case CCL would be required to immediately cease accepting waste for disposal upon notice from the County of the decision.

With the No Project Alternative, no horizontal or vertical extension of the landfill footprint would occur. Communities that currently rely on the CCL for waste diversion and disposal would not have access to that activity and the mixed organics processing/composting operation and HHWF at CCL would not be developed. The set-aside of land for potential future conversion technology would not be established and site operational elements, such as free cleanup days for the Val Verde community, would no longer be held with the closure of the facility.

Certain activities would continue at CCL under the No Project Alternative. Closure activities would commence, which would include removing facilities and placing final cover, among other activities. Revegetation of the site would occur for a number of years after final cover is placed. Under the terms of the current CUP for CCL, operation of a materials recovery facility, HHWF, and/or composting facility could continue through November 24, 2027, and the Landfill Gas-to-Energy (LFGTE) Plant would continue operation for many years beyond site closure.

The Original Draft EIR and the Partially Recirculated Draft EIR determined that the No Project Alternative neither avoids nor substantially lessens the potentially significant environmental impacts of the Proposed Project, nor accomplishes the primary purposes and objectives of the Proposed Project. This is based on the following:

- To the extent that the system is able to absorb the wastes currently disposed of at CCL, many of the daily operational impacts would be simply transferred from one facility to another. For example, the existing traffic associated with the currently permitted operations would be redirected to other landfills. This would result in additional traffic traveling on state highways and county roads, which may be experiencing congested conditions unlike the roadways serving the Proposed Project site.
- To achieve available capacity, permit conditions for the remaining landfills in the system may have to be changed to allow increased daily waste disposal tonnage, and/or sites may have to be expanded to satisfy the short- and long-term daily disposal need with the closure of CCL. Under those circumstances, additional unanticipated significant environmental impacts of increased waste disposal could be transferred to other locations in the county or elsewhere. To change permits or expand other sites, each permitting agency would have to undertake a permit revision, as discretionary projects under CEQA. Changes to permits would potentially entail a public review process under CEQA.

- None of the basic project objectives would be achieved, such as supporting Los Angeles County's goals of maintaining adequate reserve landfill capacity; managing the county's waste disposal needs, which specifically includes expansion of CCL; and providing solid waste disposal without interruption to protect the public health and safety as well as the environment. These objectives are reiterated in Los Angeles County's *2014 Annual Report* as discussed in the feasibility analysis for this alternative.
- The other Proposed Project objectives, such as providing a site that could accommodate future waste conversion technology solutions and providing a location for a permanent HHWF would not be achieved.
- Closing CCL would not afford Los Angeles County the opportunity to capitalize on the use of CCL's location as a potential expansion site to develop landfill disposal capacity, as well as to realize other waste disposal reductions associated with resource recovery and beneficial reuse operations.
- Under the No Project Alternative, the existing landfill waste diversion programs that are relied upon by many local cities and communities in achieving state mandates for waste diversion would end.
- The No Project Alternative would result in the premature closure of the landfill with underutilized remaining airspace capacity, thereby not maximizing the value of the site.

#### **Alternative New Site in Northern Los Angeles County**

The Proposed Project is to allow the expansion of an existing landfill on property owned by the applicant, a private entity. CEQA does not require the study of an alternative location to a project proposed by a private applicant. The Partially Recirculated Draft EIR, evaluates an alternative offsite location (Alternative E) within northern Los Angeles County. Alternative E assumes that CCL closes when the limited operational waiver ceases to be in effect.

The Alternative New Site in Northern Los Angeles County neither accomplishes the primary purposes and objectives of the Proposed Project nor avoids or substantially lessens the significant impacts associated with the Proposed Project, based on the following considerations:

- An Alternative New Site Alternative would take 10 to 15 years to ultimately permit and develop, but there is no certainty that such a site would be approved. Assured waste disposal capacity is required now and in the foreseeable future.
- An Alternative New Site Alternative would not achieve most of the basic project objectives, such as expanding CCL with additional capacity and resource recovery operations and maximizing the value of the site.
- An Alternative New Site Alternative would not provide cost-effective disposal capacity through continued operation and development of the existing CCL facility; nor prevent premature closure of the landfill with underutilized remaining permitted airspace capacity.
- An Alternative New Site Alternative would not continue to provide landfill waste diversion programs that are relied upon by many local cities and communities in achieving state-mandated goals.
- An Alternative New Site Alternative would result in potentially more environmental impacts associated with constructing an entirely new facility, including potential impacts to land use, biological resources, cultural resources, air quality, and greenhouse gasses and climate change.

#### **Alternative F: Rail Haul Transport to Out-of-County Landfills**

The Original Draft EIR had considered but eliminated a rail haul transport alternative from further evaluation. The recirculated Project Alternatives chapter evaluates a waste-by-rail system. The starting

point of the waste-by-rail (WBR) system for Los Angeles County is the Puente Hills Intermodal Facility, located near the Puente Hills Material Recovery Facility, approximately 55 miles southeast of CCL in the City of Industry. Residual waste from material recovery facilities and transfer stations located throughout Los Angeles County will be loaded onto rail carts at the Puente Hills Intermodal Facility, and then transported via rail to the Mesquite Regional Landfill (MRL) for disposal. There are currently no intermodal yards in the Santa Clarita Valley with rail haul capabilities nor are there rail lines connecting the Santa Clarita Valley to the MRL site. The MRL, located approximately 210 miles from Los Angeles, is the only out-of-county landfill with rail access that is currently available for use by jurisdictions in Los Angeles County. The landfill is located in Imperial County and owned and operated by the Los Angeles County Sanitation District. The Rail Haul Transport to Out-of-County Landfills Alternative neither avoids nor substantially lessens the effects associated with air quality, or other potential environmental impacts, when compared to the Proposed Project. This alternative also, only partially meets the objectives of the Proposed Project. This determination is based on the following:

- The MRL is a remote desert landfill, located over 200 miles from CCL. Currently there is no transfer station in northern Los Angeles County and no rail loading facility to accommodate the consolidation and transportation of waste. Furthermore, population projections have indicated that Los Angeles County and the area surrounding Chiquita Canyon will continue to grow and generate more refuse in the future. The waste generated in the Chiquita Canyon waste shed would be transported over a much farther distance for disposal, thus potentially resulting in increased air emissions over those anticipated for the Proposed Project.
- Waste transport by train also has impacts on noise levels, vibration, traffic, and air quality.
- The WBR system and MRL is also not yet operational and would begin operation only when found to be technically and economically feasible. As a best case, the Los Angeles County's *2014 Annual Report* assumes that the WBR system could begin operation in 2018, although this date is uncertain.
- The Rail Haul Transport to Out-of-County Landfills Alternative would be subject to out-of-county host fees and taxes, further contributing to the uncertainty of the economic competitiveness of this alternative.
- Consideration of WBR to a remote location would not secure landfill capacity in proximity to population centers served by CCL; would not expand CCL within its existing leasehold boundaries; and would not maximize the utilization of available airspace within the CCL site property holdings and realize the value of the property to its fullest potential. CCL does not own or control a site served by a rail haul or intermodal capability.

# CCL Topical Responses

## 19. Project Need

### Summary of Comments

Generally, comments received focused on requests to justify the Proposed Project need. One comment was received stating that according to the Los Angeles County Siting Element (Volume II, Appendix 1- D) prepared by the Los Angeles County Department of Public Works (LACDPW) Environmental Program Division in June 1997, there is no landfill capacity shortfall in Los Angeles County at this time. Several comments were received stating that the analysis to justify the project need is outdated due to recently approved legislation and that the need for additional disposal capacity be re-evaluated to reflect the following legislation:

- Assembly Bill (AB) 939
- Senate Bill (SB) 1016
- AB 341
- AB 32
- AB 1594
- AB 1826
- SB 498

### Response

The Los Angeles County Siting Element referenced in one comment was prepared in 1997. The analysis contained in the 1997 Siting Element is outdated and no longer accurate (LACDPW, 1997).<sup>1</sup> The Original Draft EIR relied on the 2012 Annual Report to the Countywide Integrated Management Plan prepared by the LACDPW, which had the most current data regarding disposal and capacity rates for the County at the time the Original Draft EIR was released for public review.

The evaluation of the need for the project in the Original Draft EIR took into consideration the requirements of AB 939, AB 341, SB 1016, and AB 32, while also evaluating other competing policies. These bills are discussed in both Original Draft EIR, Chapter 1, Introduction and Chapter 18, Project Alternatives. AB 1594, AB 1826, and SB 498 were all signed into law following release of the Original Draft EIR for public review in July 2014. The overall goals of these bills are aimed at maximizing the amount of waste diverted from landfills.

There has been a great deal of activity in California's legislature with regard to phasing out the land disposal of organic waste and encouraging organic waste recycling programs and alternative and/or conversion technologies for the treatment of waste. Given this, the Proposed Project relies on LACDPW's assessment of waste disposal capacity for Los Angeles County, rather than an assessment of individual pieces of legislation, to determine the need for the Proposed Project. The 2015 Annual Report

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<sup>1</sup> Los Angeles County Department of Public Works (LACDPW). 1997. *City of Santa Clarita Circulation Element, Amendment Final Environmental Impact Report*. October.

to the Countywide Integrated Waste Management Plan (LACDPW, 2016<sup>2</sup>) addresses AB 939, AB 341, SB 1016, AB 32, AB 1594, AB 1826, and SB 498.

The 2015 Annual Report was used to update the discussion of need for the Proposed Project (LACDPW, 2016). The discussion of Proposed Project need from the Partially Recirculated Draft EIR (Chapter 1, Introduction, Section 1.4) is included below in its entirety:

*LACDPW prepares an Annual Report to the County of Los Angeles CIWMP. The 2014 Annual Report evaluates seven scenarios assuming various capacity options that are currently available or may become available in the future (e.g., existing in-County landfill capacity, import/exports, out-of-County disposal facilities, diversion, alternative technologies, etc.) to assist the County in meeting the Daily Disposal Demand for the planning period, from 2014 to 2029. All seven scenarios assume an increase in diversion rate considering all jurisdictions in the County are required to comply with new state law such as the mandatory commercial recycling and diversion of organics from landfills. The report concludes that in order to maintain adequate disposal capacity, jurisdictions in the County must continue to pursue all of the following strategies:*

- *Maximize Waste Reduction and Recycling*
- *Expand Existing Landfills*
- *Study, Promote, and Develop Alternative Technologies*
- *Expand Transfer and Processing Infrastructure*
- *Out-of-County Disposal (including Waste-by-Rail)*

*The 2014 Annual Report (LACDPW, 2015) specifically identifies several areas in which the Proposed Project supports the waste management needs of Los Angeles County. These are summarized below:*

- *“To meet disposal capacity needs during the planning period, jurisdictions in the County must..., if found to be environmentally sound and technically feasible, expand in-County Class III landfill capacity.”*
- *“Expanded landfill capacity is necessary, provided it can be done in a technically feasible and environmentally safe manner.”*
- *“The County acknowledges that although all the scenarios assume an increase in diversion rate, there will be significant challenges in developing the processing capacity needed by the 2020 deadline. Therefore, maintaining adequate reserve (excess) capacity will be essential in ensuring that the disposal needs of the County are met throughout the 15-year planning period.”*

*The 2014 Annual Report also includes an update to the Countywide Siting Element (CSE), a component of the County General Plan. The current CSE revision includes the proposed expansion of two in-County Class III landfills – Chiquita Canyon and Scholl Canyon Landfills – in order to increase landfill capacities within the County (LACDPW, 2015).*

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<sup>2</sup> County of Los Angeles Department of Public Works (LACDPW). 2016. *County of Los Angeles Countywide Integrated Waste Management Plan 2015 Annual Report, Countywide Summary Plan & Countywide Siting Element*. December.

*The Proposed Project includes a 560 ton per day mixed organics processing/composting facility and a Set-Aside for a Future Waste Conversion Facility. Both of these project elements support the County's goals to promote, encourage, and expand waste diversion activities at disposal facilities, to reduce or remove organic material from landfills, to develop additional in-County solid waste management infrastructure for composting and anaerobic digestion facilities, and to assist jurisdictions in achieving higher diversion rates.*

Subsequent to release of the Partially Recirculated Draft EIR for public review on November 9, 2016, LACDPW issued the 2015 Annual Report to the CIWMP (LACDPW, 2016). The 2015 Annual Report draws the same conclusions as the 2014 Annual Report used to update the Proposed Project need, which is that in-County landfills (including Chiquita Canyon Landfill) should be expanded, if found to be environmentally sound and technically feasible, and that expansion of existing in-County landfills is an important part of Los Angeles County's overall waste management strategy for the next 15 years.

Both the 2014 and 2015 Annual Reports also update the countywide siting element (CSE), a component of the County General Plan. The current CSE revision includes the proposed expansion of two in-County Class III landfills – Chiquita Canyon Landfill and Scholl Canyon Landfills – in order to increase landfill capacities within the County (LACDPW, 2016).

# CCL Topical Responses

## 20. Property Values

### Summary of Comments

Comments were received from the general public suggesting that the Chiquita Canyon Landfill (CCL) expansion will result in a significant loss in property values for the residences and businesses located in Val Verde, Castaic, and Hasley Hills. It was stated that the Los Angeles County Assessor should report on the property value effects on all properties within 1.8 miles from the landfill and that the report should contain projected values if the extension is approved along with the values if the landfill is closed as commenters purport is presently required by contract (Topical Response #5, Conditional Use Permit and Community Agreement, for additional information). Commenters stated that short term profits from the landfill operations must be weighed against the loss of continued property tax incomes from high end businesses and residential locations in the landfill area. Comments also suggested that businesses would relocate out of the area if the expansion were approved. One commenter asked how residents will be compensated for the loss in value of their home.

### Response

An Environmental Impact Report (EIR) is required to document the potential environmental impacts of a project being considered. The California Environmental Quality Act (CEQA) does not require an economic analysis of tax benefits or losses as a result of a proposed project. Under CEQA, “[a]n economic or social change by itself shall not be considered a significant effect on the environment.” (CEQA Guidelines, Section 15382). CEQA does not require an analysis of social and economic impacts, only physical impacts to the environment as a result of a project.

The Los Angeles County Board of Supervisors found in 1997 that the landfill is consistent and compatible with surrounding land uses. Additionally, the Proposed Project is consistent with current underlying plan designations, is consistent with currently underlying zoning designations, and would not conflict with applicable land use criteria.

Landfill operations at CCL have been permitted by Los Angeles County since 1965, and housing and business have continued to be built near the landfill. Between the prior CCL expansion EIR (1995-1997) and present, the Commerce Center east of the landfill has been developed, and numerous commercial, industrial, and residential developments have been proposed surrounding CCL, as described in the Original Draft EIR Section 3.2.9, Cumulative Impacts, and shown in Figure 3-1, Cumulative Projects. Numerous local businesses and Chambers of Commerce have provided letters of support for the Proposed Project. There is no evidence to support the comments stating that businesses would relocate out of the area if the Proposed Project were approved or that Los Angeles County would experience a reduction in tax income from the loss of business or residential developments.

Notwithstanding the above, a CCL Housing Price Impact Study (Study) was conducted for the Proposed Project by real estate advisory firm RCLCO to evaluate residential pricing trends in Val Verde and similar surrounding areas of CCL as compared to the Los Angeles Metropolitan Statistical Area (MSA)<sup>1</sup>.

The Study compared the annual rates of change in the average price per square foot for single-family properties in the 91384 zip code located within per miles of CCL to the Los Angeles MSA. The Study examines two time periods: 1997 to 1999 and 2005 to 2014.

The Study concludes that CCL “has not impacted the rate of change in home prices in the Subject Areas, and that there is no clear relationship between the Landfill and changes in home prices in its surrounding residential areas.” The Study found that from 1997 to 1999, home prices in Val Verde outpaced the Los Angeles MSA by 21.4 to 29.6 percent, and from 2010 to 2014, home prices in Val Verde outpaced the Los Angeles MSA by 4.4 to 17.8 percent. Only from 2005 to 2009 did home prices in Val Verde decline at a faster rate than the broader Los Angeles MSA, by 14.4 to 30.4 percent. Based on this data, there is “no basis to conclude that the Landfill has impacted surrounding area home price appreciation.”

The RCLCO Study is attached to the Final EIR as Appendix L.

Topical Response #5, CUP and Community Agreement, contains additional information about the current CUP for CCL and the agreement between CCL and the Val Verde community.

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<sup>1</sup> The Los Angeles Metropolitan Statistical Area is defined as Los Angeles and Orange counties.

# CCL Topical Responses

## 21. Public Health

### 21a. Health Risk Assessment for Project Emissions

Commenters have stated that the Proposed Project at the Chiquita Canyon Landfill (CCL) would result in exposures to air contaminants and landfill gas emissions, which would produce impacts to public health. They state that an inadequate analysis has been conducted of health risks potentially associated with the Proposed Project. Contrary to the findings of the health risk assessment, commenters state that significant human health risks would be associated with emissions from the Proposed Project.

#### **Response – Health Risk Assessment**

Public health concerns with the construction and operation of the landfill have been addressed by preparing a health risk assessment that includes potential cancer-causing effects and potential non-cancer effects from facility emissions of toxic air contaminants. The health risk assessment, included in Chapter 11 of the Partially Recirculated Draft EIR and Final EIR, was prepared in accordance with guidelines published by the state of California's Office of Environmental Health Hazard Assessment (OEHHA) and the South Coast Air Quality Management District (SCAQMD). The health risk assessment has been prepared in a manner that substantially overstates the risks associated with facility emissions, in order to provide more assurance that the Proposed Project does not produce significant impacts to public health. The health risk assessment is based on assumptions which are "conservative". In other words, these assumptions are intended to overstate rather than understate the potential for human exposure to project emissions. Examples of these conservative assumptions include estimating "worst-case" pollutant emissions from the facility; estimating the levels of pollutants (or concentrations) in air based on worst-case meteorological conditions, including consideration of the wind-speeds and wind directions that would result in the highest pollutant concentrations in air from the Proposed Project; estimating potential human exposure based on a hypothetical maximum exposed individual, who is assumed to be located at the point where the highest pollutant concentrations in air will be found. A resident who is a maximum-exposed individual is assumed to be located at that point for 24 hours per day, 350 days per year, over a lifetime. The methods used to evaluate cancer risks from facility emissions are designed to provide the highest possible (or upper-bound) estimate of risk to the hypothetical maximum-exposed individual. The methods used to evaluate the potential for other kinds of adverse health effects (noncancer effects) are based on protection of sensitive members of the population.

The cumulative effect of all of these assumptions is that the risk associated with emissions from a facility is substantially overstated. Human health risks associated with emissions from a facility are unlikely to be higher at any other location than at the location of the maximum exposed individual. If there is no significant impact associated with concentrations in air at the hypothetical maximum exposed individual location, it is unlikely that there would be significant impacts in any location in the vicinity of the facility. The results from the health risk assessment are then compared with stringent thresholds to determine if the risks, estimated with these very conservative methods, are considered significant. The thresholds for assessing cancer risks, which can range from a risk of 1 in one million to 10 in one million for all types of cancers, are a small fraction of the risk of cancers from existing causes. SCAQMD has defined a significant impact for the California Environmental Quality Act as a 10 in 1 million incremental lifetime cancer risk. The threshold for assessing other adverse, noncancer health effects is based on estimated exposures not exceeding a pollutant-specific Reference Exposure Level (REL). A REL is a pollutant concentration in air that is intended to protect the public, including sensitive populations, and is based

on the most sensitive health effect associated with that pollutant. Chronic non-cancer health risks are assessed by comparing the predicted annual ground level concentrations of toxic air contaminants (TACs) (the potential exposure levels) to the chronic RELs developed by OEHHA to obtain a hazard index for chronic impacts (HIC). The acute non-cancer health risks are assessed by comparing the 1-hour maximum TAC ground level concentrations with the acute RELs developed by OEHHA to obtain the hazard index for acute impacts (HIA). The HRA included in the Air Quality chapter of the Partially Recirculated Draft EIR demonstrated the chronic and acute non-carcinogenic impacts (HIC and HIA) predicted for exposure to estimated Proposed Project emissions would be below the SCAQMD significance threshold of 1.0 for all receptors.

## **21b. Project Emissions Result in Additional Risks to the Surrounding Community**

Commenters stated that emissions from the Proposed Project would add health risks to communities already subjected to numerous environmental burdens. Commenters stated that many of the project impacts, such as emissions of diesel particulate matter and carcinogenic volatile organic compounds, are already present in the air in Los Angeles County at levels posing unacceptable health risks.

### **Response – Additional Health Risks from Project Emissions**

Emissions from the Proposed Project represent an incremental change in risks from existing conditions. An objective of the Air Quality Impact Analysis is to analyze that increment and determine if it is significant. Environmental and public health officials have studied the health risks associated with the existing conditions in order to develop policies and requirements for feasibly reducing those risks. One example of these studies is the Multiple Air Toxics Exposure Study (MATES), which has been conducted by the SCAQMD. The latest version of this study, MATES-IV, was published in 2014. The results from this study indicates there are some communities in Los Angeles County where emissions of toxic air pollutants are associated with estimated lifetime cancer risks of greater than 1,200 in one million from all sources (mobile and stationary sources). The results of the MATES-IV study indicate that motor vehicles and other mobile sources of air pollution are the predominant source of cancer-causing toxic air pollutants in the Basin, and that the largest contributor to total cancer risk is from diesel particulate matter (PM) emissions. The results from MATES-IV indicate that total estimated cancer risks in the area around the Proposed Project (the Castaic area, including the Val Verde community), from all emissions sources, are approximately 300 to 400 in one million. While the SCAQMD stresses these results do not represent actual health outcomes associated with potential exposure to toxic air pollutants (they are based on a conservative health risk assessment), they provide an indication of the differences in estimated risks at different locations within the South Coast Air Basin. As described in the Public Health Evaluation technical memorandum (Appendix M), maximum impacts to human health projected for project-related air toxics emissions in the health risk assessment for the Proposed Project are a very small fraction (approximately 2 to 3 percent) of the existing health impacts projected for air toxics in the South Coast Air Basin. It is unlikely that combined risk impacts from project emissions and existing air toxics levels in the area would be significantly different from the existing estimated risks.

The California Communities Environmental Health Screening Tool (CalEnviroScreen) was developed by OEHHA to assess the cumulative impacts of environmental pollution in California communities. CalEnviroScreen combines indicators of environmental impacts, such as exposure to fine PM, ozone and diesel PM in air, pesticide use, toxic releases from industrial facilities, traffic density, drinking water quality, presence of cleanup sites, impaired surface water bodies, and siting of solid and hazardous waste facilities, with population characteristics information including proportion of children and elderly in a Census tract, occurrence of asthma-related emergency room visits, low-birth-weight births, educational attainment, linguistic isolation, poverty and unemployment, to produce an overall CalEnviroScreen score. These scores allow the ranking of communities in California in terms of overall environmental health impact. Based on the indicators evaluated in CalEnviroScreen, the census tract

containing the Proposed Project ranks in the 66th to 70th percentile of California census tracts for cumulative impacts (Appendix M). This is similar to the calculated impacts for census tracts located to the west of the census tract containing the Proposed Project site. Pollutant burdens in the census tract around the Proposed Project site are ranked higher by CalEnviroScreen than adjoining census tracts to the north, east and south. However, it does not rise to the level of a disadvantaged community as defined under Senate Bill 535. Examining CalEnviroScreen 3.0 results for all of Los Angeles County identifies many communities with higher scores, for example, Los Angeles, Gardena, Glendale, Long Beach, North Hollywood and Pico Rivera, located in the valley, further to the south of the project site.

While emissions from the Proposed Project may create an incremental increased risk, this increase is determined not to be significant. The health risks, which were calculated in a conservative manner as described previously, would not substantially contribute to the existing risks for the surrounding community.

### **21c. Project Emissions are Associated with Symptoms and Adverse Effects**

Some commenters have stated there are occurrences of symptoms and adverse health effects from exposure to volatile compounds in landfill gas, such as hydrogen sulfide and vinyl chloride, and that additional health studies are needed before making a decision regarding the Proposed Project.

#### **Response – Symptoms and Adverse Effects from Project Emissions**

The public health impacts which have been analyzed for proposed construction and operation of the landfill have multiple possible sources and causes. This makes it difficult to relate causes (such as emissions from landfill operations) to impact (such as occurrence of symptoms or health effects) with any degree of certainty. Understanding these potential relationships involves careful, systematic study. A recent systematic study of health effects around landfills concluded that health outcomes observed from the existing studies are not specific for emissions from municipal landfill sites. In a few cases, there have been weak associations between landfills and health effects, but it is cautioned these also may be due to chance, bias or emissions from sources other than a landfill (Appendix M).

Another approach for systematically studying pollutant exposures and potential health risks is to conduct a health risk assessment for project emissions. The health risk assessment uses methods that systematically estimate "worst-case" health risks, and then compares those worst-case risks with highly stringent health thresholds, as a way to offset uncertainties associated with health risks from environmental exposures.

Individual reports of symptoms are useful in identifying where potential health impacts should be tracked or studied, but by themselves are not sufficient to establish a relationship between emissions and health impacts. Disease trends such as asthma and cancer, which have some potential relationships with contaminants found in project emissions, have been analyzed to determine if the community surrounding the project site is exposed to any unique health impacts.

The occurrence of asthma in Los Angeles County is measured from statistics collected by the Los Angeles Department of Public Health. Asthma incidence in Los Angeles County is tabulated by Service Planning Areas (SPA). The prevalence of asthma in communities around the project site falls within the range observed for all eight SPAs across Los Angeles County designated by the Los Angeles Department of Public Health. Asthma prevalence in SPA 2 (San Fernando area in the northern portion of Los Angeles County where the Proposed Project is located) is indistinguishable from the asthma prevalence elsewhere in Los Angeles County. Similarly, the cancer mortality rates for selected cancers (lung cancer and leukemia) in SPA 2 are not distinguishable from mortalities estimated for Los Angeles County. These two types of cancer were selected because they have a relationship with constituents in emissions from the Proposed Project: lung cancer (may be associated with exposure to diesel particulate matter) and leukemia (may be associated with exposure to benzene) (Appendix M).

# CCL Topical Responses

## 22. Public Scoping and Public Outreach

### 22a. Public Scoping

#### Summary of Comments

Many requests were received to extend the public comment period for the Original Draft EIR beyond the minimum 45-day review period. Commenters also stated that the Los Angeles County Department of Regional Planning (LADRP) must expand the notification process to include other affected areas up to 1.8 miles from the Chiquita Canyon Landfill (CCL), including three regions of the Castaic Area Town Council. Comments were also received that stated that LADRP has failed to provide adequate notice to the many Spanish-speaking residents living near CCL, and has denied these residents meaningful opportunities to participate in the environmental review process. Commenters have suggested that this is violation of civil rights.

#### Response – Original Draft EIR

The California Environmental Quality Act (CEQA) process for review of an EIR ensures that appropriate reviewing agencies have had the opportunity to review the Draft EIR, comment on the EIR, and have had their comments responded to. Public participation has also been encouraged throughout the environmental disclosure process. Hard copies of the Original Draft EIR were made available at the LADRP office, the Castaic Library, Valencia Public Library, and the Old Town Newhall Library. An electronic version of the Original Draft EIR was posted on Los Angeles County's website. The official public review period of 45 days ran from July 10 to August 23. The public comment period was extended by 30 days, ending on September 23, 2014. The public comment period was subsequently extended by an additional 30 days, with a final end date of October 23, 2014, and total review period of 105 days. Los Angeles County has not only complied with the state's notification and review process, but has substantially exceeded the required public review period, and is not in violation of the Civil Rights Act. Notifications were sent to all property owners and tenants within a 1,000-foot radius of the landfill, according to state and county requirements. There is no requirement in the CEQA, or Los Angeles County's process, for an expanded notification process. However, notices were also sent to all addresses in Val Verde.

The Lead Agency, after detailed review by its own staff and by that of other County agencies, released the Draft EIR for public review and comment. It did so only after ensuring that the Draft EIR contains sufficient relevant information regarding potential environmental impacts of the Proposed Project and is in compliance with CEQA.

All Los Angeles County notices issued for the Original Draft EIR included a statement in Spanish indicating a phone number that Spanish-speaking citizens could call for additional information and assistance. The Notice of Hearing Examiner Public Hearing, Notice of Completion and Notice of Availability for the Original Draft EIR were translated into Spanish and published in the Spanish newspaper, *La Opinion*. A Spanish translator was present at the Hearing Examiner meeting during the Original Draft EIR public comment period. Signs with meeting information were also posted at the landfill.

The following public meetings required by the CEQA and county process were held:

- Scoping Meeting as described in the Notice of Preparation for the Proposed Project: Tuesday, December 6, 2011, at the Val Verde Community Regional Park Facility
- Hearing Examiner Hearing, as described in the Notice of Availability/Notice of Completion of a Draft EIR for the Proposed Project: Wednesday, July 31, 2014, at the Castaic Sports Complex-Gymnasium, Castaic, California

### **Response – Partially Recirculated Draft EIR**

Hard copies of the Partially Recirculated Draft EIR were made available at the LADRP office, the Castaic Library, Valencia Public Library, and the Stevenson Ranch Library. An electronic version of the Partially Recirculated Draft EIR was posted on Los Angeles County's website, along with the Original Draft EIR. The Partially Recirculated Draft EIR was released on November 9, 2016, with an official public review period of 60 days, exceeding the required public review period of 45 days. The Notice of Hearing Examiner Public Hearing, Notice of Completion, and Notice of Availability for the Partially Recirculated Draft EIR was translated into Spanish and sent in English and Spanish to all property owners and tenants within a 1,000-foot radius of the landfill, according to state and county requirements. There is no requirement in the CEQA, or Los Angeles County's process, for an expanded notification process. However, English and Spanish notices were also sent to all addresses in Val Verde.

The Lead Agency, after detailed review by its own staff and by that of other Los Angeles County agencies, released the Partially Recirculated Draft EIR for public review and comment. It did so only after ensuring that the Partially Recirculated Draft EIR contains sufficient relevant information regarding potential environmental impacts of the Proposed Project and is in compliance with CEQA.

All Los Angeles County notices issued for the Partially Recirculated Draft EIR included a statement in Spanish indicating a phone number that Spanish-speaking citizens could call for additional information and assistance. The Notice of Hearing Examiner Public Hearing, Notice of Completion, and Notice of Availability for the Partially Recirculated Draft EIR were translated into Spanish and published in the Spanish newspaper, *La Opinion*, and also published in Spanish in *The Signal* newspaper. Additionally, the Executive Summary for the Partially Recirculated Draft EIR was made available in Spanish, and signs for the Hearing Examiner Meeting posted at CCL were fully translated into Spanish, and the Notice of Hearing Examiner Public Hearing, Notice of Completion, and Notice of Availability for the Partially Recirculated Draft EIR were posted in both English and Spanish on the community bulletin board in Val Verde.

A Spanish translator was present at the Hearing Examiner meeting during the Partially Recirculated Draft EIR public comment period.

The following public meeting required by CEQA and County process for the Partially Recirculated Draft EIR was held:

- Hearing Examiner Hearing, as described in the Notice of Availability/Notice of Completion of a Partially Recirculated Draft EIR for the Proposed Project: Thursday, December 15, 2016, Stevenson Ranch High School Theater, Stevenson Ranch, California

The Regional Planning Commission will hold an additional public meeting to obtain additional public input to the Proposed Project following the release of the Final EIR.

## 22b. Project-Specific Outreach

CCL representatives attended and presented at numerous community meetings specific to the Proposed Project. These meetings are in addition to those that are required as part of the CEQA public scoping process for the Proposed Project (22a, Public Scoping) and provided the community with further opportunities to learn about the Proposed Project and ask questions directly to CCL representatives.

Prior to release of the Draft EIR, CCL representatives participated in the following meetings:

- June 12, 2014: Val Verde Civic Association
- June 18, 2014: Castaic Area Town Council
- June 26, 2014: Castaic Chamber of Commerce Board of Director's Meeting
- July 3, 2014: Castaic Area Town Council Agenda Meeting
- July 8, 2014: Santa Clarita Valley Chamber of Commerce Government Affairs Meeting

Following release of the Draft EIR, CCL representatives participated in the following meetings:

- July 10, 2014: Santa Clarita Valley Economic Development Committee Board of Directors Meeting
- July 24, 2014: Castaic Chamber of Commerce Board of Directors Meeting
- July 28, 2014: Val Verde Community Advisory Committee Meeting
- August 6, 2014: West Ranch Town Council Meeting
- August 7, 2014: Los Angeles County BizFed Advocacy Committee Meeting
- August 12, 2014: Santa Clarita Valley Chamber of Commerce Board of Directors Meeting
- August 13, 2014: Castaic Area Town Council Land Use Committee Meeting
- August 19, 2014: Los Angeles County BizFed Board Meeting
- September 25, 2014: Santa Clarita Valley International Charter School Board of Directors Meeting

## 22c. Regular Outreach

### Summary of Comments

General comments were raised stating that there is a lack of communication between CCL and the public. Commenters stated that CCL does not provide the amount of information that they should.

### Response

Information about CCL is readily available to the public through a variety of resources. The public can obtain information directly from CCL by phone, email, and by accessing their website, [www.chiquitacanyon.com](http://www.chiquitacanyon.com). CCL maintains a regular blog and email list, operates a 24-hour hotline for information, and attends the bi-monthly Val Verde Community Advisory Committee (VVCAC) meetings. CCL is also a heavily regulated business that must follow numerous federal, state, and local regulations. Because of this, information about the facility is easily accessible to the public. These resources are described below.

### Information Direct from CCL

Information can be directly obtained from or provided to CCL through the following channels:

#### Telephone

(661) 257-3655 – Business Hours

(877) 263-2561 – After Hours (Bilingual Operators available)

### **Website**

The CCL website provides information about how to contact the facility, join the email list, access the blog, and lists the schedule for free disposal days in Val Verde, the VVCAC meetings and other community events. The website is: <http://www.chiquitacanyon.com/>

### **24-Hour Hotline**

For the past 18 years, CCL has operated a 24-hour hotline for information.

(661) 253-5155 - 24-hour hotline

### **Site Tours**

CCL offers tours to members of the public. Information given on tours is available on the CCL website. Tours can be arranged by calling the facility or sending an email.

CCL conducts more than two dozen tours each year for local community/business leaders, school groups, civic organizations and residents. Board members from the VVCA, CBFC, VVCAC and the CATC have participated in facility tours over the last 2 years as part of CCL's ongoing public outreach efforts.

### **Public Meetings**

#### **Val Verde Community Advisory Committee**

The VVCAC exists to serve as a liaison between CCL and the local community as a means for the community to communicate with the Regional Planning Commission and other regulatory agencies on an ongoing basis regarding issues involved in the development and operation of the landfill. Chiquita Canyon representatives attend the bi-monthly meetings of the VVAC to provide regular, and timely updates and reports regarding landfill operations. Meetings are open to the public and held at the Embassy Suites Hotel located at 28508 Westinghouse Place, Valencia, CA 91355. The VVCAC publishes their meeting dates a year in advance and the information can be found online at [www.valverdeCAC.org](http://www.valverdeCAC.org). The meetings are generally held bi-monthly on the fourth Monday of the odd numbered months (January, March, May, July, September and November). In addition to the regular meetings, CCL staff are in regular communication with members of the VVCAC board regarding landfill operations.

The existing Conditional Use Permit for the landfill specifies that the membership of the VVCAC be appointed by the County Board of Supervisors and that the members be qualified and attend meetings regularly. The Conditional Use Permit also requires that the majority of the members of the VVCAC be Val Verde residents. The non-Val Verde members have consistently taken an active interest in Val Verde and landfill operations and they have been a welcomed, necessary, and an impartial part of the VVCAC.

In addition, CCL has provided \$20,000 annually to the VVCAC for administrative expenses to run the Committee as well as hire appropriate consultants to review reports and community monitoring equipment.

#### **Castaic Area Town Council**

The Castaic Area Town Council (CATC) is an advisory board presenting community points of view to the Los Angeles County Board of Supervisors and various county departments such as Regional Planning, Public Works, and Parks & Recreation. The CATC is comprised of ten elected representatives from five regions within the 100 square miles of Castaic and its various communities, including Val Verde. A representative from the landfill has attended nearly every monthly CATC meeting over the last four years and provided updates as needed or requested.

## **Publicly Accessible Information**

In addition to the resources above, the public can obtain detailed information about CCL operations from CalRecycle, the Los Angeles County Department of Public Works, the South Coast Air Quality Management District (SCAQMD), and the State Water Resources Control Board.

### **CalRecycle**

CalRecycle has developed the Solid Waste Information System facility database which contains information on solid waste facilities, operations, and disposal sites throughout the State of California. For each facility, the database contains information about location, owner, operator, facility type, regulatory and operational status, authorized waste types, local enforcement agency and inspection and enforcement records. The data in the facility database is continuously updated and the downloadable data file is updated every Monday, Wednesday, and Friday at 6:00 a.m. Inspection and Enforcement Records are current to the last quarter.

The Solid Waste Information System website is: <http://www.calrecycle.ca.gov/SWFacilities/Directory/>

### **Los Angeles County Department of Public Works**

The Solid Waste Information Management System (SWIMS) was developed by the Los Angeles County Department of Public Works to provide a one-stop internet portal for the public and solid waste industry to access information about solid waste facilities and waste disposal data in Los Angeles County. SWIMS is a tool through which information about solid waste management activities in the County is made readily available to the public. For example, a report can be generated using the SWIMS that details the total tons of waste received and the type of waste received at CCL during a specified time period.

The SWIMS website is: <http://dpw.lacounty.gov/epd/swims/>

The public can be added to the Los Angeles County email list to be notified of when the SWIMS is updated. This request can be sent by contacting the SWIMS Administrator at [swims@dpw.lacounty.gov](mailto:swims@dpw.lacounty.gov) or 1-(888)-CLEANLA or 1-(888)-253-2652.

### **South Coast Air Quality Management District**

Public information about SCAQMD-regulated facilities can now be accessed online through a web tool called FIND - Facility Information Detail. FIND provides consolidated access to public information including information about the facility equipment, compliance, emissions, and hearing board case files. The public can also generate a Public Records request from SCAQMD for more detailed or older information about a facility.

The SCAQMD website is: <http://www.aqmd.gov/contact/public-records>

### **State Water Resources Control Board**

Environmental data for facilities in California regulated by the State Water Resources Control Board is available to the public via a web tool called GeoTracker. This web tool lets the public search for regulated facilities, and provides information related to cleanup actions, regulatory activities, environmental data, site maps and documents, and community involvement.

The GeoTracker website is: <http://geotracker.waterboards.ca.gov/>

The State Water Resources Control Board also provides information to the public via the Storm Water Multiple Application and Report Tracking System (SMARTS). The SMARTS system lets members of the public search for information related to stormwater permits. For CCL, this includes documentation related to the general permit to discharge storm water, and inspection reports.

The SMARTS website is: <https://smarts.waterboards.ca.gov/smarts/faces/>

# CCL Topical Responses

## 23. Public Services and Utilities

Comments were received related to public services, including fire protection, sewage disposal, and the water supply for the Proposed Project. A summary of the comments by topic and the responses are provided below.

### 23a. Fire

#### Summary of Comments

A commenter indicated that the Draft Environmental Impact Report (EIR) does not cover fires, and that emergency plans must be in place for fire.

#### Response

Fire control is addressed in the Original Draft EIR in Chapter 2, Project Description, Section 2.2.9.6 and in the Partially Recirculated Draft EIR Project Description, Section 2.2.8.8. Fire control is also addressed in the Original Draft EIR Chapter 14, Public Services and Utilities, Sections 14.4.2 and 14.5.2, Fire Control.

The risk of a fire occurring at the landfill was evaluated and is considered to be minimal. Fires related to methane gas, in particular, are rare events and are controlled by the landfill cover and the landfill gas collection and control system that operates 24 hours a day, 7 days per week. Chiquita Canyon Landfill (CCL) currently maintains mobile firefighting equipment onsite 24 hours a day, 7 days per week. This equipment includes a water wagon, water trucks, bulldozers, and onsite fire hydrants. CCL has about 150,000 gallons of onsite water stored in water storage tanks located throughout the site. Fire protection service for CCL is provided by the Los Angeles County Fire Department, with an average response time of approximately 3 to 4 minutes. CCL will comply with applicable Los Angeles County Fire Department regulations and work closely with the fire department during permit condition clearance. Appendix C to the CCL's existing Joint Technical Document is an Emergency Response Plan that includes provisions for response to fires.

### 23b. Sewage Disposal

#### Summary of Comments

A commenter indicated that the landfill should be connected to a nearby sewer system.

#### Response

The Los Angeles County Department of Public Works agreed with the findings of the Original Draft EIR that there will be less than significant impacts on the existing sewer system since the Proposed Project proposes to continue the usage of a septic tank and portable toilets and there is no existing sewer system in proximity of CCL.

The Los Angeles County Department of Public Health – Environmental Health Division has reviewed the Original Draft EIR for the Proposed Project and determined that the use of a septic tank for sanitary facilities at the landfill is appropriate and allowable.

## **23c. Water Supply**

### **Summary of Comments**

Several comments were provided on the subject of the project's water supply. Commenters stated that the Draft EIR relied upon a 2011 Water Supply Assessment from a company that does not serve CCL, and that the Water Supply Assessment included in the Draft EIR is inaccurate and out of date.

### **Response**

An Addendum to the 2011 Water Supply Assessment for the Proposed Project, prepared by the Valencia Water Company and approved at their Board meeting on January 31, 2017, has been obtained, and is included in Appendix J of the Final EIR.

The 2017 Water Supply Assessment Addendum prepared by the Valencia Water Company for the Proposed Project (Appendix J) concluded that "Valencia Water Company's total existing and projected water supplies will meet the water demands associated with the Project in combination with existing and other planned uses within VWC's service area."

# CCL Topical Responses

## 24. Source of Waste/Importation of Out-of-County Waste

### Summary of Comments

Commenters requested clarification on whether Chiquita Canyon Landfill (CCL) will accept waste from outside Los Angeles County and to specifically identify the jurisdictions that currently use CCL, as well as jurisdictions to be served by the project. Commenters also stated that each county should provide waste disposal capacity within their jurisdictional boundaries and not rely on other county's facilities.

### Response

CCL maintains records for the Disposal Reporting System as required by Title 14 California Code of Regulations, section 18800 et seq. In accordance with these requirements, as well as Los Angeles County requirements, CCL tracks the origin of waste for every incoming load. CCL currently receives waste from outside of the County and will continue to do so with the Proposed Project. In general, there are no geographic constraints on the sources of waste. Because management of solid waste in Los Angeles County is characterized by several disposal facilities serving a large metropolitan area, as opposed to one major facility serving a specific city or county area, there can be major variations in the source of wastes received at CCL or Los Angeles County over any particular time period. Contributing factors include temporary or permanent closures at other landfills, changes in disposal fees, or other circumstances not controlled by CCL. Thus, market factors (i.e., supply and demand; disposal pricing) largely dictate where the waste disposed at CCL originates.

In general, CCL currently receives waste from the Santa Clarita Valley, including Val Verde, Castaic, Santa Clarita, and the surrounding unincorporated county; the northern San Fernando Valley; the greater Los Angeles Basin via various transfer stations; and a limited area of Ventura County. Detailed information about the source of waste can be obtained by accessing the County of Los Angeles Department of Public Work's Solid Waste Information Management System (SWIMS).<sup>1</sup>

Los Angeles County is both an importer and exporter of waste. In 2015, Los Angeles County exported 4.1 million tons of waste to out-of-county landfills, representing a continued increase over prior years. By contrast, 170,352 tons of waste were imported from jurisdictions outside Los Angeles County in 2015. Thus, in 2015, Los Angeles County was a net exporter of waste, exporting 3.9 million more tons of waste than it imports.

If Los Angeles County prohibits the importation of waste, out-of-county jurisdictions that currently accept waste from Los Angeles County could themselves prohibit importation. Such a prohibition could have serious negative consequences for Los Angeles County. The County of Los Angeles Countywide Integrated Waste Management Plan 2015 Annual Report evaluated seven different scenarios for waste management in Los Angeles County to determine if the daily disposal demand could be met for each year during the 15-year planning period. Six of the seven scenarios included exports to out-of-county landfills. Of the one scenario that does not include waste exports (*Utilization of Permitted In-County Disposal Capacity Only*), the 2015 Annual Report concluded that a shortfall in disposal capacity would

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<sup>1</sup> <http://dpw.lacounty.gov/epd/swims/>

occur. For four of the scenarios, Los Angeles County assumes that 4.68 million tons of waste would be exported each year to out-of-county landfills (15,000 tons per day), and for the remaining two scenarios, Los Angeles County assumes that 6.24 million tons of waste would be exported to out-of-county landfills, including via waste-by-rail.

Recent state legislation and court decisions have showed a trend away from importation restrictions. In 2011, Assembly Bill (AB) 1178 was approved by the Senate Environmental Quality Committee, which proposed to amend Sections 40002 of the Public Resources Code related to solid waste and place of origin, and to add Section 40059.3. The bill was rewritten in 2012 as AB 845 and approved by Governor Brown in September 2012. AB 845 went into effect in January 2013. With the addition of Section 40059.3 to the Public Resources Code, cities and counties are prohibited from restricting or limiting the importation of solid waste into a privately held landfill based on place of origin. This bill was written in response to Measure E, a Solano County voter initiative (from 1984) to limit the amount of solid waste imported to Solano County to a maximum of 95,000 tons. Solano County stopped enforcing Measure E in the early 1990s after deeming the measure unconstitutional. In regards to a landfill expansion, in 2013, the California Court of Appeal's First Appellate District ruled Measure E is no longer a valid reason for restricting the proposed expansion of the Potrero Hills Landfill in Solano County.

With respect to environmental impacts, importation across county lines should be considered. With the ever increasing regulations of landfills and associated costs, there are fewer landfills available. Consequently, they are larger and tend to serve a larger area. Often, these areas encompass several jurisdictions. Environmental impacts are minimized if municipalities and haulers use a closer landfill even if a political or jurisdictional boundary is crossed rather than transporting waste further to stay within the jurisdiction. Conversely, the additional travel by trucks to more remote in-county locations could result in greater air quality and traffic impacts.

# CCL Topical Responses

## 25. Traffic

Comments have been received expressing concern regarding the increase in landfill-related traffic and its effect on Interstate (I) 5, State Route (SR) 126, and roadways within the City of Santa Clarita, cumulative traffic impacts of the Proposed Project, and methods used to evaluate the traffic impacts. The comments and responses have been organized into these topic areas. The responses below are based on the analysis and findings provided in the *Chiquita Canyon Landfill Master Plan Traffic Impact Analysis* (TIA) (Appendix G of the Final Environmental Impact report [EIR]), Chapter 10, Traffic and Transportation, of the Final EIR, and additional information provided in the response to California Department of Transportation (Caltrans) Comment Letter 24 and Comment Letter 390. Given the technical nature of the Caltrans comments received, individual responses to their comments are provided following Comment Letters 24 and 390.

### 25a. Interstate 5

#### Summary of Comments

It was stated that while most of the Proposed Project traffic is expected to use I-5, there is no analysis of potential impacts to I-5. It was requested that the analysis include the potential impacts to I-5 mainline.

Several comments were made that the Chiquita Canyon Landfill (CCL) should make payments to Caltrans for the wear and tear on I-5 and for added lanes on I-5. A comment was received stating concurrence with Los Angeles County Planning that traffic is a significant impact that must be mitigated, that the owner of CCL should be required to contribute to the Westside Bridge and Thoroughfare District to mitigate local impacts, and to contribute to I-5 mitigation funds for truck lanes. Concerns were raised about the impacts to Newhall Pass with the addition of more than 400 trucks each day. One commenter stated that the freeway from McBean to SR-126 is in poor condition and asked who will be responsible for the road conditions and repairs on I-5 and for the overcrowding of vehicles on I-5. One commenter raised concerns regarding the impacts of alternate traffic flow during snow closures of I-5. One commenter asked who is responsible for preventing car accidents from the number of trucks that will be coming through the Santa Clarita Valley.

#### Response

##### Mainline I-5 Analysis

Caltrans is the Reviewing Agency for traffic concerns on I-5. For detailed responses to their comments, please refer to Comment Letter 24 and Comment Letter 390 in the Final EIR. At the request of Caltrans, a freeway analysis was performed for the I-5 mainline. The analysis was performed for the I-5 freeway segments south of SR-126, as Proposed Project trips north of SR-126 are nominal (two trips travelling northbound on I-5 and two trips travelling southbound on I-5 in both peak hours). Based on the analysis conducted the Proposed Project would not impact mainline I-5.

In November 2016, Los Angeles County voters approved a sales tax ballot measure, the Los Angeles County Traffic Improvement Plan (Measure M). Measure M is proposed to ease traffic congestion; expand rail and rapid bus systems; repave local streets, repair potholes and synchronize signals; make public transportation more accessible, convenient, and affordable for seniors, students, and the

disabled; earthquake-retrofit bridges; embrace technology and innovation; create jobs, reduce pollution, and generate local economic benefits; and provide accountability and transparency. As part of Measure M, the I-5 North Capacity Enhancements would add one truck lane, one HOV (carpool) lane, and auxiliary lanes (additional outside lanes extending between an on-ramp and a subsequent off-ramp) on I-5, between SR-14 and Lake Hughes Boulevard. The existing general purpose lanes would be maintained. The design phase is scheduled to occur from Summer 2016 to Winter 2018, with construction estimated to occur Spring 2019 through Winter 2022. These improvements, while unrelated to the Proposed Project, would contribute to overall traffic easing on I-5.

The Proposed Project would have no impact on Newhall Pass, because the Proposed Project trips represent such a small percentage of the overall freeway traffic. I-5 currently carries 193,000 average daily trips near the SR-14 junction. The project-added trips represent an approximately 0.5 percent increase in the daily traffic load. For more information, please see the responses to Comment Letter 24.

### **Off-Ramp Queuing Analysis**

In response to Caltrans' statements that a majority of the truck traffic exiting northbound I-5 and continuing westbound on SR-126 uses the right-most left-turn lane, vehicle classification counts were collected for the northbound approach to evaluate the existing traffic pattern. A queuing analysis was conducted for all scenarios to reflect the lopsided stacking of trucks in the right-most left-turn lane. Review of the anticipated 95th percentile queue lengths shows that the peak hour queue lengths do not exceed the available off-ramp storage in any of the five scenarios analyzed. For more information please see the responses to Comment Letter 24.

### **Mitigation of Impacts to State Facilities**

Caltrans has a standard formula for calculating a project's equitable share for mitigating traffic impacts to state facilities. While the Proposed Project does not result in a significant traffic impact based on Los Angeles County and Caltrans' traffic impact thresholds, CCL will consult with Caltrans requiring the payment of any necessary fees. Also, commercial vehicles are regulated by federal and state law. These regulations are primarily enforced by the California Air Resources Board (for vehicle emissions), the California Department of Motor Vehicles (DMV) (for driver's licenses and vehicle registration), the California Highway Patrol (for inspections and highway safety and laws), and Caltrans (for permits and operations). Commercial vehicles are required to obtain transportation permits for truck travel on city, county, and state roadways. Trucks traveling on public roads pay fees specifically designed to fund road maintenance. For example, the DMV collects weight fees based on the gross weight of commercial vehicles. Therefore, the daily wear and tear on I-5 is partially mitigated through the payment of vehicle license and permit fees that are required to operate a commercial vehicle, such as those vehicles coming to and from CCL.

The assertion that traffic is a significant impact that must be mitigated is not supported by the TIA. Specifically, the County concurs with the analysis and conclusions in the EIR that traffic impacts would be less than significant as a result of the Proposed Project.

### **Snow Closures of I-5**

According to Caltrans, full closures of I-5 (near the grapevine) occur during the winter months an average of 3-5 times per year, and therefore are a relatively rare event. As noted above, the majority of the project traffic on I-5 is anticipated to be coming to and from south of SR-126 and not over the grapevine. Snow closures on I-5 have never been reported to be an issue for trucks destined for CCL. With regards to other vehicular traffic on I-5, it is not the responsibility of CCL to manage the effects of snow closures on I-5. However, the following information provides further discussion on snow closures

on I-5. Caltrans, in conjunction, with the California Highway Patrol and local partner agencies developed “Operation Snowflake” in response to the emergency snow closures on I-5. Operation Snowflake includes three phases of response. Phase 1 includes reporting and warning motorists that snow is falling on the grapevine. During Phase 2, the California Highway Patrol is pacing or escorting groups of motorists over the pass due to snow falling and sticking to the ground. Phase 3a means that I-5 is closed but detours are possible using Highway 58 and Highway 166. Phase 3b means that I-5 and Highway 58 are closed but detours are possible using Highway 166. Phase 3c means that I-5, Highway 58, and Highway 166 are closed but detours are possible using Highway 46 and 41 to U.S. 101, and Phase 3d means all local highways are closed and no detours are available around the grapevine. Operation Snowflake takes every measure possible to ensure the highest safety to motorists while also keeping vehicles moving as quickly as possible to minimize congestion on and around I-5.

## **25b. State Route 126**

### **Summary of Comments**

It was requested that a description of the improvements under way at the Commerce Center Drive/SR-126 intersection be provided. Comments were raised regarding offsite queuing onto SR-126. One commenter stated that presently, at 6 a.m., one lane is blocked by trucks waiting to get onsite for about 1 mile. It was recommended that the SR-126 westbound right turn lane be extended and that the eastbound SR-126 left turn lane be studied to determine if the left turn pocket should also be extended. Concerns were raised about traffic flow near the entry of the landfill if there were an accident along SR-126. One commenter expressed concern regarding left hand turns across the highway and stated that there are numerous accidents due to trucks trying to cross SR-126. It was suggested that CCL provide plans to avoid queuing onto SR-126 and that additional storage should be provided on Franklin Parkway. Commenters stated that there should be a contingency plan in the event that the scale malfunctions. One commenter asked how truck traffic will be prevented from coming to the Hasley Canyon traffic circle and/or the intersection of Commerce Center Drive and Hasley Canyon. Caltrans noted that any modifications on or affecting state right-of-way will need an encroachment permit from Caltrans and early coordination with Caltrans is recommended.

### **Response**

#### **Commerce Center/SR-126 Improvements**

The following text has been added to the TIA and Chapter 10 of the Final EIR describing the completed improvement project at Commerce Center Drive/SR-126: “The Commerce Center Drive/SR-126 improvement project included reconstructing the at-grade intersection into a grade-separated diamond interchange. Vehicles on SR-126 are able to travel uninterrupted through the Commerce Center Drive crossing and vehicles on Commerce Center Drive access SR-126 via signalized diamond interchange ramps on Commerce Center Drive.”

#### **Offsite Queuing onto SR-126**

At the request of Caltrans, a queuing analysis was conducted regarding the adequacy of storage at the intersection of SR-126 and Wolcott Way to accommodate peak hour traffic with the project-added trips. The intersection analyses show that the projected queue lengths for the westbound right-turn lane and eastbound left-turn lane at SR-126 and Wolcott Way can be accommodated within the provided storage. For more information please see the responses to Comment Letter 24.

### **Current Impacts to SR-126-Entrance Relocation**

The comment that traffic currently backs up for a mile or more on SR-126 is not substantiated by the existing traffic count data that was collected for the TIA. The Proposed Project will remove the existing CCL entrance which is currently located on SR-126 and construct a new entrance on the corner of Wolcott Way and Franklin Parkway, therefore minimizing potential for queuing onto SR-126.

A queuing analysis of the new project entrance was also included in the TIA and Chapter 10 to ensure that projected CCL traffic will not queue through the Wolcott Way/Franklin Parkway intersection. The analysis evaluated the potential queue based on the estimated number of inbound trash-related (disposal) truck trips and based on the estimated number of inbound trash-related (disposal) truck trips based on actual gate receipt data for the existing landfill operations. The queuing analysis demonstrates that the storage provided at the new CCL entrance will easily be able to accommodate the projected number of vehicles arriving to the site throughout the day and will provide enough storage to accommodate projected CCL traffic without queuing onto public roadways.

In addition to the analysis in the TIA and Chapter 10 of the Original Draft EIR, a Traffic Supplement, included in the Partially Recirculated Draft EIR, was prepared to evaluate queuing at the new Proposed Project site entrance using the clarified baseline for traffic. The Traffic Supplement demonstrated that the clarified baseline does not affect the findings from the queuing analysis in the TIA and Chapter 10 of the Original Draft EIR. Sufficient storage exists to accommodate the clarified baseline traffic. Therefore, no queuing onto SR-126 is anticipated to occur. The findings of the Traffic Supplement have been incorporated into the Traffic and Transportation chapter of the Final EIR and the Traffic Supplement is included in Appendix G of the Final EIR.

There have been no fatal accidents on SR-126 at the entrance to CCL as a result of trucks entering or exiting the site. The entrance relocation is not only designed to facilitate queuing, but to also enhance safety, as trucks will not be required to make a left hand turn from either SR-126 into the site or from the site onto SR-126. Rather, trucks will turn at a signalized intersection with ample turning lane storage.

### **Scale Malfunction**

In case of scale malfunction, failure of the scale, or an emergency, (all rare occurrences), project-related traffic will not need to queue onto Wolcott Way back to SR-126. CCL has backup power for the scales, the ability to put inbound trucks on outbound scales, and the ability to store trucks on the landfill site if needed until scales are operational. These methods will ensure project-related traffic will not be required to queue onto Wolcott Way back to SR-126.

### **Impacts to Hasley Canyon**

It is unlikely that a truck traveling southbound on I-5 would choose to exit at Hasley Canyon Road, turn left onto the Old Road, turn right onto Hasley Canyon Road/Commerce Center Drive, and turn right onto Franklin Parkway. Instead trucks will likely travel southbound on I-5 and exit at SR-126, which are both highways and designated truck routes. The route from I-5 to SR-126 is approximately 0.5 miles longer than exiting at Hasley Canyon Road, but significantly better suited for truck travel. As noted above, the number of project trips travelling to and from I-5, north of SR-126, is nominal, making it even more unlikely that the trucks would use Hasley Canyon Road.

## 25c. Impacts to the City of Santa Clarita

### Summary of Comments

The City of Santa Clarita raised concerns that the increase in daily traffic will cause increased traffic congestion and vehicular delay for residents and employees in the city, based on the project trip distribution of 85 percent to/from the south on I-5 and 7 percent to/from the east on Newhall Ranch Road. The city stated that a majority of the projected traffic increase will consist of trucks, which create more congestion than an equal number of smaller vehicles. The city noted that 16 percent of the increased traffic is projected to occur during the a.m. peak hour which will cause increased delay for motorists traveling southbound on I-5 through the Santa Clarita Valley. The city is requesting preferred disposal rates and priority access to the landfill to offset the anticipated effects on Santa Clarita Valley residents. The city is requesting that CCL partner with the city to implement the annual Bike to Work Day and Rideshare events. The city noted that a sponsorship from the landfill in the amount of \$5,000 for each event on an annual basis would assist the city with planning and promoting the events, educate local residents, and reduce overall traffic congestion.

Other commenters raised general concerns that impacts to the City of Santa Clarita when the I-5 closure at Newhall pass occurs were not evaluated. Commenters asked whether the trucks will be diverted through Santa Clarita or other areas during the Newhall Pass closure and if the SR-126 off-ramp is also closed.

### Response

#### Traffic Impacts to City of Santa Clarita

As previously described, a freeway analysis was performed on I-5 freeway segments south of SR-126 (and included as a response to Comment Letter 24). South of SR-126, 64 trips will travel along northbound and southbound I-5 to/from SR-126 to access/leave CCL in the a.m. peak hour. It was assumed that all trips travelling to/from I-5, south of SR-126, would have origins or destinations south of Pico Canyon Road. The analysis shows that all northbound and southbound freeway segments on I-5 currently operate at an acceptable LOS during both peak hours and will continue to operate at an acceptable LOS under the Existing plus Growth and Existing plus Growth plus Other Development (cumulative) Conditions with the project-added traffic. There would be no impact through the Santa Clarita Valley. South of Pico Canyon Road, Proposed Project trips on I-5 would continue to decrease as vehicles leave I-5 for destinations east or west of I-5. As Proposed Project trips decrease south of Pico Canyon Road, their impact is considered nominal because they represent such a small percentage of the overall freeway traffic on I-5.

The estimated number of project trips were converted to passenger car equivalents at a factor of 2.0 (i.e. the number of project trips were doubled to account for slower moving truck traffic when evaluating the intersection and freeway operating conditions with the project-added traffic). This factor was agreed upon by Los Angeles County staff during the scoping process for the traffic report. Therefore, the analysis accounts for differences in effects of trucks versus passenger cars.

#### Impacts to the City from Newhall Pass Closure

The Newhall Pass improvement project is complete and according to Caltrans, there are no scheduled future closures for Newhall Pass. For more information, see the responses to Comment Letter 24.

### **Disposal Rates and Priority Access**

In response to the City of Santa Clarita's request for preferred disposal rates and priority access, the EIR correctly determined that the project will not result in significant impacts to traffic and transportation that require mitigation. Therefore, there is no nexus to link the potential for significant traffic impacts to preferred disposal rates and priority access for the City of Santa Clarita. Any discussions between CCL and the City of Santa Clarita regarding preferred rates and priority access should be conducted outside of the environmental review process for the Proposed Project.

CCL is very supportive of the City's Bike to Work Day and Rideshare events, and is likely to provide financial sponsorship of those events. However, such sponsorship would be voluntary, not in response to a significant impact associated with traffic.

## **25d. Cumulative Traffic Impacts**

### **Summary of Comments**

Caltrans stated that previous studies for the Newhall Ranch Specific Plan development have identified improvements to SR-126 including widening it to 4 lanes in each direction through the segments next to CCL. The Master Plan revision should recognize future improvements to SR-126 and contribute to their implementation commensurate with its contribution of future traffic. It was stated that the cumulative traffic analysis (including queueing) should be revised to include all foreseeable development within the Newhall Ranch Specific Plan and in the Commerce Center area. It was stated that the Newhall Ranch Development will add 21,000 homes to the area and the Hunt Williams Residential Property, Tapia Ranch and the Palmer property will bring an additional 1,300 homes to the area. It was requested that a detailed study on the impact of the peak potential vehicle landfill trips be provided and that adding the traffic from CCL will put an additional burden on traffic. It was requested that a detailed study on the impact to commuters, delivery vehicles, mail trucks and business owners be provided.

### **Response**

At the request of Caltrans, an analysis of the future improvement along SR-126 in conjunction with the proposed Newhall Land and Farm (NLF) developments has been conducted. The supplemental analysis evaluates the potential peak number of landfill vehicle trips added to the surrounding roadways. However, it is infeasible to categorize the potential impacts by user (e.g. impacts to commuters versus mail trucks). The analysis shows that there would be no significant traffic impact to any vehicles travelling on SR-126 or I-5 or through the intersections along these roadways. For more information, see the responses to Comment Letter 24.

In the vicinity of the project, the NLF developments will be built in the next 20 to 30 years. The NLF improvements on SR-126 include widening of SR-126 (between Los Angeles County line and Commerce Center Drive) and intersection improvements at SR-126 and Wolcott Way. The improvements along SR-126 will be phased as various phases of the NLF developments are built out. A long-term future analysis of the SR-126/Wolcott Way intersection (with the proposed improvements) was done for the year 2045, also at the request of Caltrans. By the year 2045, Phase 3 of the NLF improvements will be built. The analysis shows that the Proposed Project will not have a significant impact at the intersection of SR-126/Wolcott Way in the long-term future (Year 2045) based on the Los Angeles County Congestion Management Program (CMP) guidelines. For more information, see the responses to Comment Letter 24.

## 25e. Methodology

### Summary of Comments

Specific comments were made regarding the methodology used and the calculations presented in the traffic analysis. It was suggested that the Intersection Capacity Utilization (ICU) and Highway Capacity Manual (HCM) methodologies be combined so that it paints a more realistic picture of the need for things such as a signal at Chiquito Canyon Road/SR-126, etc. One commenter stated that all calculations should be redone if the latest version of the HCM method was not used and revised according to any changes or updates to the HCM method.

Commenters requested clarification on how the number of inbound vehicles was calculated, whether the numbers represent vehicles per hour, and if there will be more peak hours where there will be 200 to 300 trucks per lane per hour. It was stated that the traffic study does not account for the haul trucks for daily cover. One comment requested that the source of traffic that would be considered “Other” outbound traffic in Tables 2-3 to 2-5 in Chapter 2, Project Description, be identified and to clarify whether the outbound trucks include those hauling leachate, household hazardous waste from the Household Hazardous Waste Facility, compost materials, and comingled recyclables.

Commenters requested clarification on what constitutes “morning and evening peak hours” and what “Other Development Conditions” includes. It was requested that the Newhall Ranch Development be included if it was not already.

One commenter requested that the mileage from CCL to all current clients (ranging all the way from Orange County to Santa Clarita) be added to further illustrate traffic impacts. It was suggested that if more clients from further away are sending more waste in the event of an expansion, the traffic impact is considerably expanded as well. It was suggested that the idling time should be recalculated to a realistic formula. The commenter stated that it is not possible to inform trucks that they can only idle for 2, 3.5, or 5 minutes when they are stuck on the SR-126/I-5 corridor.

### Response

#### Scope of Traffic Analysis

The scope of the analysis in the TIA and Chapter 10, Traffic and Transportation, is in accordance with direction provided by Los Angeles County Department of Public Works (LACDPW), Traffic and Lighting Division staff. The signed Memorandum of Understanding, which outlines the agreed upon scope of the traffic analysis, is provided in Appendix A of the TIA. The methods used satisfy both the requirements of LACDPW, as well as the Traffic Impact requirements of the Los Angeles County Congestion Management Plan.

#### Highway Capacity Manual and Intersection Capacity Utilization Methodology

Traffic analysis for the intersections was conducted using the HCM and the ICU methodologies to satisfy the requirements of both Caltrans and the County. Caltrans uses the HCM methodology for intersection analysis. The HCM methodology assesses LOS based on average delay per vehicle. The delay is calculated using peak hourly traffic volumes, peak hour factors, number of lanes, type of operation (signalized or unsignalized), and other factors. For this study, the most current version of the HCM methodology was implemented using the Synchro software (Version 8). The ICU methodology provides a comparison of the number of vehicles actually passing through an intersection during a given hour to the theoretical hourly vehicular capacity of that intersection. A saturation flow rate of 1,600 vehicles/hour/lane for all through/turn lanes and 2,880 vehicles/hour/lane for all dual turn lanes

was used in the ICU calculation, consistent with the guidance provided in the Los Angeles County CMP. The ICU calculation returns a volume-to-capacity ratio that translates into a corresponding LOS. For comparison purposes, both the HCM and ICU analysis values are reported in the summary tables. However, consistent with the CMP guidelines, all impacts are assessed using the ICU methodology only.

### **Inbound/Outbound Vehicles**

Tables 2-3 and 2-4 of the Original Draft EIR Chapter 2, Project Description, detailed the traffic associated with the Proposed Project, including daily inbound and outbound traffic to the site. In coordination with LACDPW, the baseline condition for the Proposed Project was revised, and the baseline traffic condition now includes all inbound and outbound vehicles. Tables 2-3 and 2-4 of Chapter 2, Project Description of the Partially Recirculated Draft EIR presents the peak daily total and average daily total, respectively, for inbound material associated with the Proposed Project. Chapter 1, Introduction, of the Partially Recirculated Draft EIR provides a detailed discussion of the assumptions used to establish the baseline condition and Chapter 10, Traffic and Transportation has been revised to reflect the change in baseline conditions.

Table 10-9 of Draft EIR Chapter 10, Traffic and Transportation shows the hourly vehicle distribution for a typical day based on historical gate information. It is assumed that the project-related trips would have a similar distribution pattern as for existing operations. It is not clear how the commenter calculated that there would be 200 to 300 trucks per lane per hour. This is incorrect. Based on the estimated peak project trip generation, there would be a two-hour period when there would be 200 to 300 total incoming vehicles. This is a conservative estimate because the maximum number of trash vehicles in each category is not anticipated to happen simultaneously. Furthermore, this original analysis assumes a significantly higher number of baseline trips than were subsequently analyzed in the Traffic Supplement, at the request of Los Angeles County.

### **Peak Hour**

Traffic studies typically focus on the “peak-hour” traffic volume in evaluating roadway and intersection conditions because it represents the most critical time period when traffic volume is at its highest. The peak hour usually coincides with the morning and evening rush hour which typically occurs sometime between 7:00 a.m. and 9:00 a.m. and again in the evening between 4:00 p.m. and 6:00 p.m. For the TIA, traffic counts were collected at the study intersections during these hours. Specifically, the peak “hour” represents the highest consecutive four 15-minute periods within the two-hour count period. The intersection LOS was evaluated based on the peak hour traffic volume for each intersection.

### **Other Development Conditions**

“Other Development Conditions” includes the projects identified in Section 3.2.9, Cumulative Impacts of the Original Draft EIR Chapter 3, General Setting and Resource Area Analysis. These projects represent the cumulative projects in the same vicinity and timeframe of the Proposed Project, and include the Newhall Ranch developments. For additional information on the issue of cumulative impacts, please see the master responses for each resource area.

### **Evaluation of Mileage to All Clients**

The request to evaluate the mileage from CCL to all current clients to further illustrate traffic impacts is not warranted. The Partially Recirculated Draft EIR Chapter 11, Air Quality, addresses the potential air quality impacts based on the estimated distance of travel for project-related trips. However, the traffic impacts have been evaluated based on industry standards and include estimating the number of Proposed Project trips, distributing those trips across the surrounding road network, and evaluating the local impacts to the surrounding roadways and intersections. While the Proposed Project may result in

more vehicle miles travelled, most of the vehicles will be widely distributed, with no concentrations of vehicles occurring, except at the site. Once distributed beyond the local road network, the project-related impact is considered nominal because the number of trips represent such a small percentage of the overall traffic volume. The Proposed Project trips dispersed over a large area would not translate into a substantial increase in traffic. No noticeable impacts to the overall transportation system are anticipated. Furthermore, individual effects across the region cannot not be identified with certainty and are therefore not warranted.

#### **Idling on SR-126**

It is not anticipated that trucks will be delayed on the SR-126/I-5 corridor. Based on TIA analyses, the study roadways and intersections, including I-5 and SR-126, will continue to operate at an acceptable LOS with the project-added traffic. Based on the historical gate receipt data, the average wait time at the scales is one minute per vehicle and there is sufficient storage onsite to accommodate the projected number of entering vehicles.

Furthermore, the California Air Resources Board implements vehicle idling regulations for heavy-duty diesel vehicles with a Gross Vehicle Weight Rating of 10,000 pounds or heavier. Per state law (California Code of Regulations, Section 2449[d][2]), idling for more than 5 minutes is generally prohibited. However, idling is allowed under the following situations:

- When the vehicle is stuck in traffic
- When idling is necessary to inspect or service the vehicle
- When operating a power take-off device
- When the vehicle cannot move due to adverse weather conditions or mechanical failure
- When the vehicle is queuing (must be beyond 100 feet from any residential area)
- When the truck's engine meets the optional low-nitrogen oxide idling emission standard, and is located more than 100 feet from any residential area (clean-idle label required)

# CCL Topical Responses

## 26. Treated Auto Shredder Waste and Shredded Tires

### Summary of Comments

Comments were made regarding the present use of treated auto shredder waste (TASW) for daily cover. Commenters indicated concern that TASW is very permeable to rainwater and contains contamination elements of its own. Commenters raised questions as to why TASW is not considered as waste when U.S. Environmental Protection Agency regulations state it as such. Assertions were made that TASW and shredded tires are flammable and toxic to fish and wildlife when ingested and that rubber migrates during compression resulting in an unstable slope or cover. One commenter claimed that according to two separate “Reports of Investigation” by the California Department of Toxic Substances Control (DTSC), regarding SA Recycling and Chiquita Canyon Landfill (CCL), CCL accepted treated auto shredder residue (ASR) that contained hazardous waste levels of zinc. The commenter asked what will be done to prevent this from happening again and stated that ASR must be sampled and analyzed on a periodic basis to ensure that it is legally allowed to be used in or on the landfill.

### Response

#### Use of Treated Auto Shredder Waste as Alternative Daily Cover at CCL

As described in Partially Recirculated Draft Environmental Impact Report (EIR) Chapter 2, Project Description, Section 2.2.3.1, Wastes to be Disposed, the Project proposes to accept for disposal all nonhazardous wastes acceptable at a Class III solid waste disposal landfill, excluding sludge. In accordance with Title 27 California Code of Regulations (CCR) Section 20220 (also defined in Waste Disposal Requirement Order No. 98-086), TASW, if nonhazardous, may be accepted.

Title 40 of the *Code of Federal Regulations* (CFR), Part 258.21 (b) allows states to approve alternative materials to be used as alternative daily cover (ADC) if landfill operators demonstrate that the alternative material and thickness will control odors, vectors, fires, litter, water infiltration, and scavenging. Materials used for ADC at CCL are approved for use by the Local Enforcement Agency (LEA) and California Department of Resources Recycling and Recovery (CalRecycle). TASW is one of 11 types of ADC materials that are allowed by CalRecycle under Title 27, CCR. Partially Recirculated Draft EIR Chapter 2, Project Description, Section 2.2.3.3, Beneficial Use Material, addresses the use of TASW as ADC.

In accordance with Title 14, CCR, Section 18800 et. seq., CalRecycle requires the use of ADC, including TASW, to be tracked and reported. Permitted landfills must track daily the types, tonnages, and origin of ADC materials used; permitted landfill operators report ADC information to counties and regional agencies; and Counties and regional agencies must report ADC usage, by landfill, quarterly to CalRecycle. CCL complies with these requirements.

TASW, sometimes called metal shredder residuals or ASR, is regulated by DTSC. As the regulatory agency in charge of TASW, DTSC controls the determination of TASW as a nonhazardous or hazardous waste. Currently, automobile shredders are allowed, under a DTSC conditional authorization, to treat TASW and to dispose of it as non-hazardous waste, under specified conditions. DTSC is currently evaluating the existing conditional authorization provided to automobile shredders. If DTSC ultimately makes the

determination that TASW should no longer be classified as non-hazardous waste, CCL would no longer accept TASW for disposal or for use as ADC. Similarly, if regulatory guidance changes regarding the use of any other material for ADC, CCL will comply with the revised guidance.

### **Management of TASW and Shredded Tires at CCL**

TASW may currently be accepted for disposal at CCL and is included in the list of non-hazardous waste materials proposed for acceptance under the Proposed Project, as described in the Original Draft EIR, Chapter 2 Project Description, Section 2.2.4, Wastes to Be Received and also the Partially Recirculated Draft EIR, Chapter 2 Project Description, Section 2.2.3, Type of Material to be Received. It may also be diverted from waste disposal and used as ADC, as described above and shown in Original Draft EIR Table 2-2, Materials Diverted from Waste Disposal and Typical Beneficial Reuse at CCL and Partially Recirculated Draft EIR Table 2-2, Beneficial Use Materials, Typical Use at CCL, and Largest 1-Day Total of Each Type. Additionally, shredded tires, which are not part of TASW, but are an auto-derived product, may be diverted from waste disposal at CCL and beneficially used to protect the methane gas pipeline system as trench backfill. In fact, CalRecycle provides grant funding for such use. Shredded tires are allowed by CalRecycle under Title 27 CCR as one of the 11 types of ADC materials.

The working face is the only place where ADC is placed. Rainwater is controlled and managed at the working face so that rainwater that comes into contact with the working face is kept at the working face and does not flow into the onsite sedimentation basins. Rainfall that hits the ground outside of the working face is collected onsite in a sedimentation basin. If a rain event is severe, the sedimentation basin may reach capacity, and stormwater may be released offsite, according to the requirements of CCL's current and future National Pollutant Discharge Elimination System permits. This stormwater may include sediment from surrounding hillsides and portions of the landfill outside the working face.

### **TASW Sampling and Reporting**

Waste Disposal Requirement 98-086 describes sampling requirements for TASW. Sampling is conducted by the producer before the material is delivered to CCL. The generator samples and analyzes the material according to state regulations, and provides sampling reports to CCL. Copies of analytical results of TASW deposited at CCL are included with the semi-annual groundwater monitoring reports provided to the Regional Water Quality Control Board.

Currently, certain metal shredding facilities have nonhazardous waste classification letters issued by DTSC and these facilities may provide TASW to CCL. The facilities are granted these conditional nonhazardous waste classifications because DTSC determined that the metal treatment fixation technologies are capable of lowering the soluble concentrations of metal shredder waste such that the treated metal shredder waste was rendered insignificant as a hazard to human health and safety, livestock, and wildlife. These classifications allow treated metal shredder waste to be handled, transported, and disposed of as nonhazardous waste in Class III landfills, such as CCL. As part of the conditional nonhazardous waste classification from DTSC, the producer is required to test the material prior to disposal. Records are provided to CCL by the producer and retained per the requirements of DTSC.

With respect to SA Recycling, the commenter did not provide the referenced "Reports of Investigation" by DTSC. However, DTSC filed a legal action against SA Recycling in April, 2011. The legal action focused primarily on requiring SA Recycling to install and maintain an air pollution control system at its Port of Los Angeles facility, but the complaint referenced DTSC sampling at landfills authorized to receive and use TASW from SA Recycling as ADC, including CCL, in March and April 2008. The complaint alleged that DTSC's analytical results indicated that certain samples of the TASW exceeded regulatory thresholds for zinc, but that the mean concentration in each truckload of ASR did not exceed regulatory thresholds for

any regulated analyte (*People v. SA Recycling, LLC*, Los Angeles Superior Court, Case No. BC 458943, April 6, 2011. Complaint, Paragraph 18). Ultimately, DTSC and SA Recycling entered into a consent agreement to settle the enforcement case and legal action. The consent order, applicable requirements of the Health and Safety Code, and continued regulatory oversight of DTSC with respect to SA Recycling's testing and recordkeeping for TASW will ensure that any TASW provided to CCL by SA Recycling will not exceed regulatory thresholds for zinc. Again, as stated above, TASW (or ASR) delivered by SA Recycling to CCL did not exceed regulatory thresholds, including the regulatory threshold for zinc. CCL was not a party to the lawsuit against SA Recycling nor party to the settlement between SA Recycling and DTSC. Hazardous materials in the form of TASW were not received nor disposed, nor placed as ADC at CCL.

# CCL Topical Responses

## 27. Visual Resources

Comments regarding visual resources include concerns about impacts to State Route (SR) 126, conflicts with local community plans, inadequate and inaccurate visual simulations, impacts to the surrounding neighborhoods, and cumulative impacts. A summary of the comments by topic and the responses is provided below.

### 27a. SR-126

#### Summary of Comments

Commenters indicated that SR-126 is a first Priority Scenic Highway and that the proposed landfill height and visibility would make this roadway forfeit the scenic designation resulting in a potentially significant impact.

#### Response

Los Angeles County Department of Regional Planning (LADRP) considered scenic routes and roadways in the analysis presented in the Draft Environmental Impact Report (EIR) for the Proposed Project. Approximately 35 miles of SR-126 (from SR-150 to Interstate [I] 5) is a proposed first Priority Scenic Highway. This portion of SR-126 became eligible as a scenic highway in 1963. As such, the roadway currently has no formal scenic highway designation. The Scenic Highway Element of the General Plan identifies the section of SR-126 south of CCL, between I-5 and Ventura County as a First Priority scenic route, proposed for further study. Nothing in the General Plan Scenic Highway Element restricts development along First Priority scenic routes. The Scenic Highways Plan of the Santa Clarita Valley Area Plan reiterates the designation of the portion of SR-126 south of Chiquita Canyon Landfill (CCL) as a First Priority scenic route. This designation does not preclude development. Official designation of a scenic route by the California Department of Transportation (Caltrans) also does not preclude development along the route.

CCL is one of many features along the overall length of the proposed scenic highway, which also includes the urban setting of Fillmore, a large subdivision located immediately east of Fillmore along the south side of SR-126, the commercial and industrial uses within the Valencia Commerce Center, and the proposed full diamond interchange at Commerce Center Drive and SR-126, all of which are/or will be visible from SR-126.

Based on the findings of the Original Draft EIR, Chapter 15, Visual Resources, as well as the Visual Supplement included in the Partially Recirculated Draft EIR, the Proposed Project would not represent a significant decrease in visual character and/or scenic quality. Thus the Proposed Project would not interfere with or prevent the consideration of SR-126 as a scenic route compared to existing conditions. As part of the Proposed Project entrance, a berm and screening wall would be constructed so that entrance facilities would be screened from view from SR-126. A combination of berm and/or wall would extend along the west side of Wolcott Way, along the entire Proposed Project entrance as it parallels SR-126, and across the existing landfill entrance. The berm and area between the berm and roadways (outside of Caltrans rights of way) would be landscaped with native grasses, shrubs, and trees. After the closure of CCL, the presence of the new fill area would create a negligible change in the landscape and these changes would not represent a significant decrease in visual character and/or scenic quality.

compared to existing conditions. Therefore, the Proposed Project would not render the roadway ineligible for the proposed designation as a Scenic Highway.

## 27b. Community Plans

### Summary of Comments

It was stated that the Castaic Area Community Standards District (CACSD) and the Santa Clarita Valley Significant Ecological Area (SEA) vista regulations are not listed as regulations in the Draft EIR. Commenters noted that CCL is located in the CACSD (22.44.137) in Los Angeles County, and is not listed as exempt from section D.6, "Significant Ridgeline Protection". It was stated that the proposed increase in height would violate the CACSD. Commenters stated that the proposed height would also be visible throughout the valley including Stevenson Ranch, I-5 and the City of Santa Clarita. It was stated that this is a violation of the One Valley One Vision Ordinance. Commenters asked about what mitigations will be made to the extended Santa Clarita Valley.

### Response

The Original Draft EIR Chapter 4, Land Use, and Chapter 15, Visual Resources, Section 15.3.3, addresses the CACSD, as does the Visual Supplement included in the Partially Recirculated Draft EIR. The Proposed Project is located within the CACSD and conforms to the CACSD requirements for ridgeline protection. Specifically, the CACSD states that "no development, grading, construction, or improvements shall be allowed on:

- i. a significant ridgeline
- ii. within a 50-foot radius from every point on the crest of a primary ridgeline
- iii. within a 25-foot radius from every point on the crest of a secondary ridgeline"

Grading for the Proposed Project complies with all of these conditions. The Proposed Project does not include grading on a protected ridgeline or within a 50-foot radius of a protected ridgeline. The Final Grading Plan for the Proposed Project as shown in Figure 2-3 of the Original Draft EIR, Chapter 2, Project Description and Figure 2-3 of the Partially Recirculated Draft EIR, Chapter 2, Project Description was designed to be consistent with the CACSD requirements to ensure that the Proposed Project does not violate any of these provisions. To demonstrate the Proposed Project compliance with the CACSD requirements for ridgeline protection, Figures 1 and 2 of this Topical Response were created to show the primary and secondary ridgelines surrounding CCL and the extent of grading for the Proposed Project.

CCL is not located within an SEA and therefore regulations associated with SEAs do not apply to the Proposed Project.

The One Valley One Vision General Plan, June 2011, describes City of Santa Clarita and County of Los Angeles standards to preserve hillside areas and significant ridgelines. The Proposed Project is not located within the City of Santa Clarita and therefore, the discussion of hillside areas and significant ridgelines within the city is not applicable to the Proposed Project. The Proposed Project is located within the County of Los Angeles. Los Angeles County standards to preserve hillside areas and significant ridgelines relevant to the Proposed Project are found in the CACSD and the relevant policies of the Santa Clarita Valley Area Plan. As described above, the Proposed Project conforms to the CACSD regarding ridgeline protection.

## 27c. Neighborhood Impacts and Visual Simulations

### Summary of Comments

Comments were received regarding visual impacts to the surrounding communities and regarding the adequacy and accuracy of the visual simulations to depict these potential impacts. Commenters requested that all height projections be shown using photos from all visually affected roadways, community ingress/egress pathways, and from the neighborhoods of Live Oak, Valencia Industrial Park, Mission Village, North River, and Val Verde. Commenters also indicated that other scenic jurisdictions along the SR-126 corridor must be considered. It was stated that within the areas of Hasley Hills and Live Oak, the CACSD violation will be considerable during the landfill operation and after closure. It was claimed that the unnatural and unsightly landform will destroy the view of the Santa Susana and San Gabriel Mountains in both Castaic and Santa Clarita.

One comment was made that the Draft EIR does not have a section regarding visual impacts on Del Valle Road and that it does not include a view from Newhall Ranch Road east of I-5 where the landfill is already visible. It was stated that the visual simulations in the EIR show only views of the landfill after it has been closed and do not include simulations prior to landfill closure, which would show trash trucks. It was stated that the simulations do not accurately depict the infrastructure needed for a closed landfill, including the 20-foot wide benches that would be required in the final landfill cap. It was suggested that the simulations do not correctly depict the view from the intersection of Commerce Center Drive and SR-126, including the proposed overpass. It was stated that the “after-simulations” show a repaired sign for the Travel Village. An explanation was requested as to why this was repaired, if CCL will be repairing it, the rust removal procedure for the sign and what type of paint will be used prevent future rust. Commenters also stated that the height, shape and dimensions of the simulated buildings should be verified.

### Response

Original Draft EIR Chapter 15, Visual Resources, concludes that the Proposed Project will result in no significant impacts to the surrounding communities. The Proposed Project will not be in violation of the CACSD. The primary visual impact associated with the Proposed Project is the change in landform, as discussed in detail in the Original Draft EIR, Chapter 15, Visual Resources. The visual simulations prepared for the Proposed Project correctly reflect the anticipated landform change.

There are no known formally designated scenic vistas with views of the Proposed Project. In lieu of formal scenic vistas, and because photos of the Proposed Project cannot be shown from all viewable locations, representative locations where the Project would likely be seen by members of the general public (referred to as Key Observation Points [KOPs]) were identified to show existing and future views of CCL. The baseline photos used for visual simulations in the Original Draft EIR, Chapter 15, Visual Resources, are of existing conditions approximately at the time the Notice of Preparation was released for the Proposed Project (November 2011).

The Visual Supplement included in the Partially Recirculated Draft EIR updated the existing condition photos for the visual simulations conducted from KOPs where the existing condition changed subsequent to the Original Draft EIR (KOP 1, KOP 2, and KOP 3). The Visual Supplement also added two KOPs (KOP 8 and KOP 9) to document additional views of the Proposed Project.

During operation of the project, the presence of trucks at the landfill, if visible, would not be expected to affect the viewer given distance and viewing angle to activities. The approximate distance between the viewer (KOP) and slopes on which activities would be occurring are shown below:

KOP 1 – 1.2 to 1.5 miles

KOP 2 – 1.1 to 1.4 miles

KOP 3 – 0.9 to 1.2 miles

KOP 5 – 0.6 to 0.9 miles

KOP 6 – 0.6 to 0.9 miles

KOP 7 – 0.6 to 0.8 miles

KOP 8 – 0.4 to 0.8 miles

KOP 9 – 1.6 to 2.0 miles

Other KOPs discussed in the EIR would not have a view of ongoing operations.

With respect to the intersection of Commerce Center Drive and SR-126, at the time the Original Draft EIR was released for public review in July 2014, the overpass was not yet constructed and it was not feasible to provide a view of the Proposed Project from that location. Between the Original Draft EIR and August 2016, the existing condition at, and view from, KOP 2 (the intersection of Commerce Center Drive and SR-126) changed significantly. Specifically, the intersection of SR-126 and Commerce Center Drive has been replaced by a fly-over intersection in approximately the same location, and on- and off-ramps to SR-126 from/to Commerce Center Drive were under construction. Drivers no longer have an extended view toward CCL from this 4-way intersection. Instead, drivers now have an elevated, but oblique, high-speed view as vehicles pass through the vicinity of SR-126 and Commerce Center Drive. The updated existing condition view of CCL from KOP 2 is shown in Figure VS-3 of the Partially Recirculated Draft EIR Visual Supplement, and simulated views of the Proposed Project from KOP 2 are shown in Figures VS-4 and VS-5.

The visual simulations of the landfill at the time of the Proposed Project closure are an accurate representation of the future condition. The simulations include facilities present at the landfill, although these facilities may not be discernable given the location of the viewer (for example, facilities such as landfill gas flares are located in the center of the site and are not visible in the visual simulations). The landfill would have 20-foot wide benches required for the final landfill cap, but from the distance and angle of the visual simulations, these benches would not be discernable. Revegetation will be guided by requirements specified in Mitigation Measure BR-1, Closure Revegetation Plan, and the Preliminary Closure and Post Closure Plan required by California Department of Resources Recycling and Recovery for the site. These requirements will help ensure that revegetated landfill slopes will closely match vegetation on existing surrounding slopes as shown in the visual simulations in the Draft EIR. This vegetation will blunt the look of the benches.

With regard to the “repair” of the Travel Village sign between the existing condition and simulated view, the “after” simulation for Figure 15-12 in the Original Draft EIR depicts a “repaired” sign for Travel Village because it is a simulated view for a future cumulative project scenario, and it is assumed that Travel Village has or will have repaired the sign. CCL did not repair the sign and will not be repairing it in the future. Further, the view of CCL from Travel Village has changed significantly from that shown in the Original Draft EIR. Figure VS-3 of the Partially Recirculated Draft EIR Visual Supplement shows the current existing condition view of CCL from Travel Village, and the Visual Supplement demonstrates that there are no longer views of CCL, existing or future, from Travel Village because of a newly constructed sound wall associated with the State Route 126/Commerce Center Drive improvements.

Regarding the request to verify the dimensions of simulated buildings, the buildings shown in the “after” simulation for Figures 15-11 and 15-12 are based on information provided by Newhall Land and Farm (NLF).

Buildings are also shown in the “after” simulation for KOP 8. This simulation is based on best available information from the preliminary site plans shown for the Newhall Ranch Specific Plan as well as building types of the style being constructed in the vicinity of CCL.

## 27d. Cumulative Impacts

### Summary of Comments

Commenters suggested that visual impacts may be significant and unavoidable with respect to the proposed Newhall Land and Farming development immediately west and south of CCL. Mitigation measures should be proposed to minimize the view of the landfill and/or Mixed Organics Composting operation from these future residential developments.

### Response

The Original Draft EIR evaluated potential views of the landfill from the west, east, and south of the landfill. KOPs 3, 4, and 5, described in the Original Draft EIR, Chapter 15, Visual Resources, show these views. The most applicable of these views related to the proposed NLF developments is KOP 4, which is a view of CCL from the south side of SR-126 at Wolcott Way, which is a future ingress/egress for NLF developments. The Original Draft EIR found that future views from these locations would be less than significant.

In addition, the Proposed Project includes lighting design that will ensure that the Project has minimal visibility during nighttime hours. The lighting design will contribute to minimizing potential views from future NLF developments. Further, development of CCL is proposed in phases that would move landfill development to the north over time, away from SR-126 and proposed developments south of SR-126. The Proposed Fill Module Layout Plan, shown in Figure 2-7 of the Partially Recirculated Draft EIR Chapter 2, Project Description, shows that development of fill areas in the southern portion of the site would occur before fill activities in the East Canyon. Partially Recirculated Draft EIR Section 2.2.5.3, Entrance and Support Facilities Construction, states that:

- Construction of the site entrance and associated support facilities will occur following project approval, and will take approximately 10 months to complete
- It is estimated that construction will be completed within 2 years following issuance of all required project approvals and resolution of any legal challenges related to those approvals

Draft EIR Chapter 15, Visual Resources, Section 15.6.3, Changes Associated with the Proposed Project, states that:

- Entrance construction would likely occur immediately upon project approval (according to the constraints identified above), which would allow fill activities to commence to the south
- Initial fill activity would move southward from the existing permitted fill area into the South Footprint before it moves into the East Canyon (with the goal to finish filling in the South footprint before significant development occurs at Newhall Ranch)
- A berm and/or screening wall would be constructed along the west side of Wolcott Way, along the entire access road as it parallels SR-126

This combination of phasing between CCL and NLF with shielded lighting to minimize nighttime views from NLF will help ensure that impacts to Visual Resources from future NLF are less than significant, similar to those described in the Original Draft EIR.

The Partially Recirculated Draft EIR Visual Supplement included a visual simulation of CCL from the Newhall Ranch Homestead Village development (KOP 9, Figure VS-10). As stated in the Visual Supplement, “the increased maximum final elevation of the expanded landfill for the Proposed Project would be visible from KOP 9, but following landfill closure, the revegetated landfill would represent an improvement in view over the existing view. Further, the engineered fill of the landfill would not block background ridgeline views, further reducing the potential for visual impacts.” Visual resource impacts associated with the Proposed Project from KOP 9 were found to be less than significant, requiring no mitigation.

## 27e Explanation of Significance Conclusions

### Summary of Comments

Commenters stated their belief that visual impacts are significant and unavoidable, rather than less than significant.

### Response

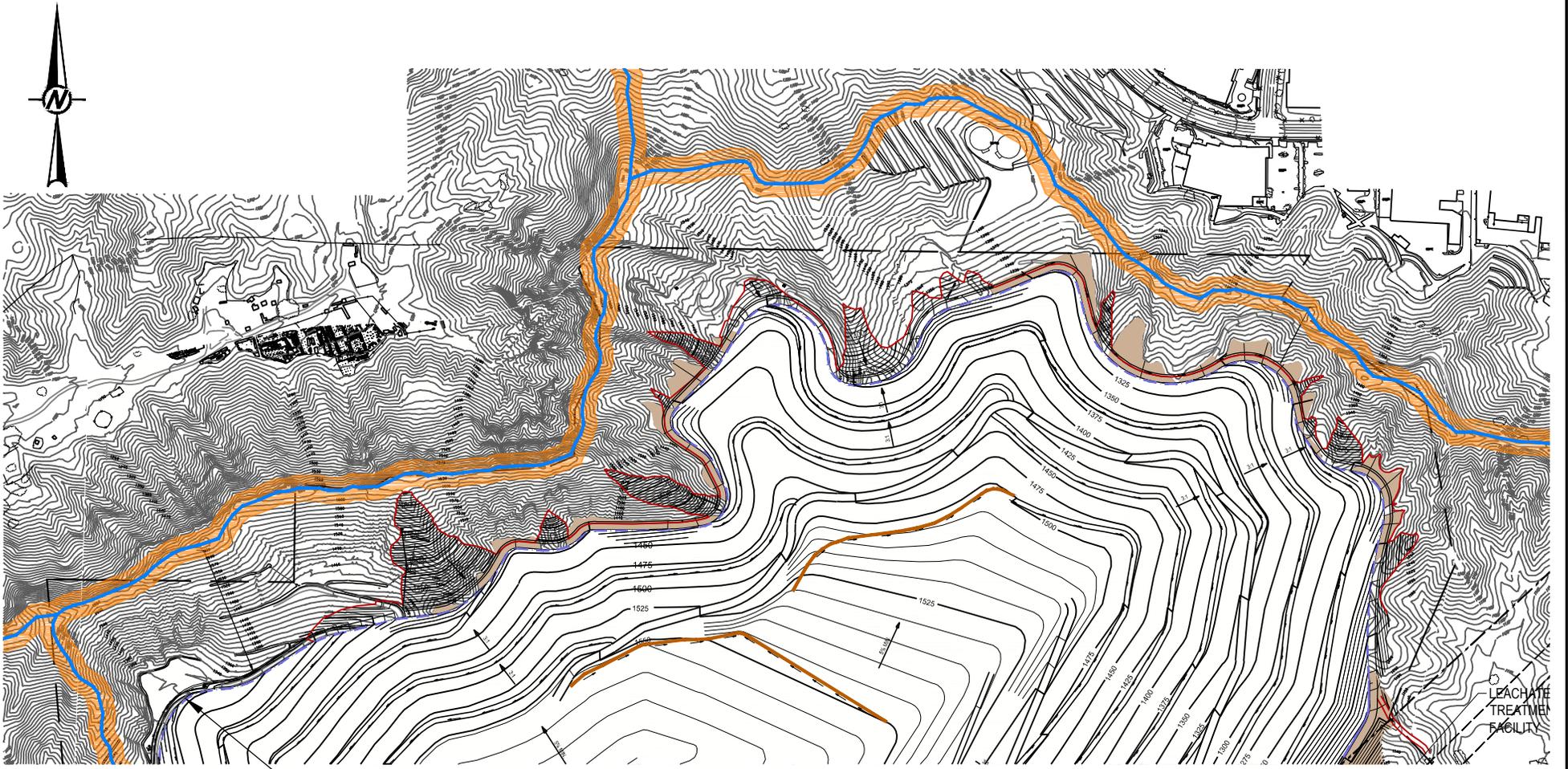
The determination of whether or not the proposed project’s visual effects would have a significant impact was based on a systematic analysis that applied the significance criteria that are defined by the Guidelines for the implementation of the California Environmental Quality Act (CEQA). Under the CEQA Guidelines, the mere visibility of a project from one or more viewpoints does not by itself constitute a significant visual impact. The key question that the CEQA Guidelines poses for establishing whether a project’s impacts are significant is: “Would the project substantially degrade the existing visual character or quality of the site and its surroundings?”

To answer the question of whether a substantial degradation would occur, the analysis used simulations to document the visual changes that the project would make to the existing views from each of the viewpoints analyzed. These changes were then evaluated in terms of a range of factors that considered how much of the view would be affected by the visual changes, what the nature of those changes would be, and the extent to which the changes would block views toward important visual features or would change the existing the levels of vividness, unity, and intactness of the view or would alter the view’s visual character.

In addition, in making a final determination of the significance of the visual change, the sensitivity of the view was taken into account. Views considered to be most sensitive are those that are seen by large numbers of people for extended periods of time, particularly when they are seen from residential and recreational areas. Views considered to have lower levels of sensitivity are those seen by smaller numbers of viewers, which are seen for short periods of time (for example, when there is a fleeting glance seen by a motorist traveling down a road), and when they are seen from places like commercial and industrial areas where it is reasonable to assume that the attention of the users of those areas is less likely to be less focused on the surrounding scenery.

The assessment of the view from the entrance to the Del Valle Emergency Training Center on Chiquito Canyon Road (KOP 8, evaluated in the Visual Resources Supplement) provides a good case in point of how the criteria for evaluating the significance of the visual impacts were applied. In this view, the landfill would be readily visible, but it would not block views toward important landscape features. In addition, the form, line, color, and texture of the closed landfill would be generally similar to those of the existing elements of the view. Although there would be some reductions in the existing levels of vividness, unity, and intactness of this view, these reductions would not be so great as to substantially degrade the view’s existing visual character and quality. Furthermore and very importantly, the visual sensitivity of this view is low. The view depicted in the existing condition and visual simulation images is

the view taken directly in front of the Emergency Training Center, a specific view that would be seen by relatively few viewers. In this vicinity, there are no residential or recreational areas with similar views toward the landfill site, and there are no other areas that would have sustained views toward the landfill. The effect of the visual changes on the experience of travelers on Chiquito Canyon Road would be limited. The view looking toward the proposed landfill would be somewhat outside the primary cone of vision of these travelers and would be seen for very short periods of time as they travel along the segment of the road where this view is available. When all of these factors are taken into account, the final determination is that although the project would be visible in this view, its impacts would be less than significant.



— APPROXIMATE INTERFACE BETWEEN EXISTING AND EXPANSION

**LEGEND**

- PRIMARY RIDGELINE
- SECONDARY RIDGELINE
- RIDGELINE BUFFER ZONE



**NOTE(S)**

1. RIDGELINE INFORMATION OBTAINED FROM LOS ANGELES COUNTY GIS DATA PORTAL WEBSITE ([HTTP://EGIS3.LACOUNTY.GOV/DATAPORTAL/](http://EGIS3.LACOUNTY.GOV/DATAPORTAL/)). DATE OF INFORMATION: OCTOBER 29, 2014. RIDGELINE BUFFER ZONE IS 50 FEET FROM PRIMARY RIDGELINE AND 25 FEET FROM SECONDARY RIDGELINE.



CLIENT  
**WASTE CONNECTION, INC.**  
**CHIQUITA CANYON LANDFILL**  
**LOS ANGELES COUNTY, CALIFORNIA**

CONSULTANT

YYYY-MM-DD 2017-01-24

DESIGNED JDR

PREPARED JDR

REVIEWED RDH

APPROVED RDH

PROJECT

**CHIQUITA CANYON LANDFILL**  
**CLOSURE/POST-CLOSURE MAINTENANCE PLAN**

TITLE

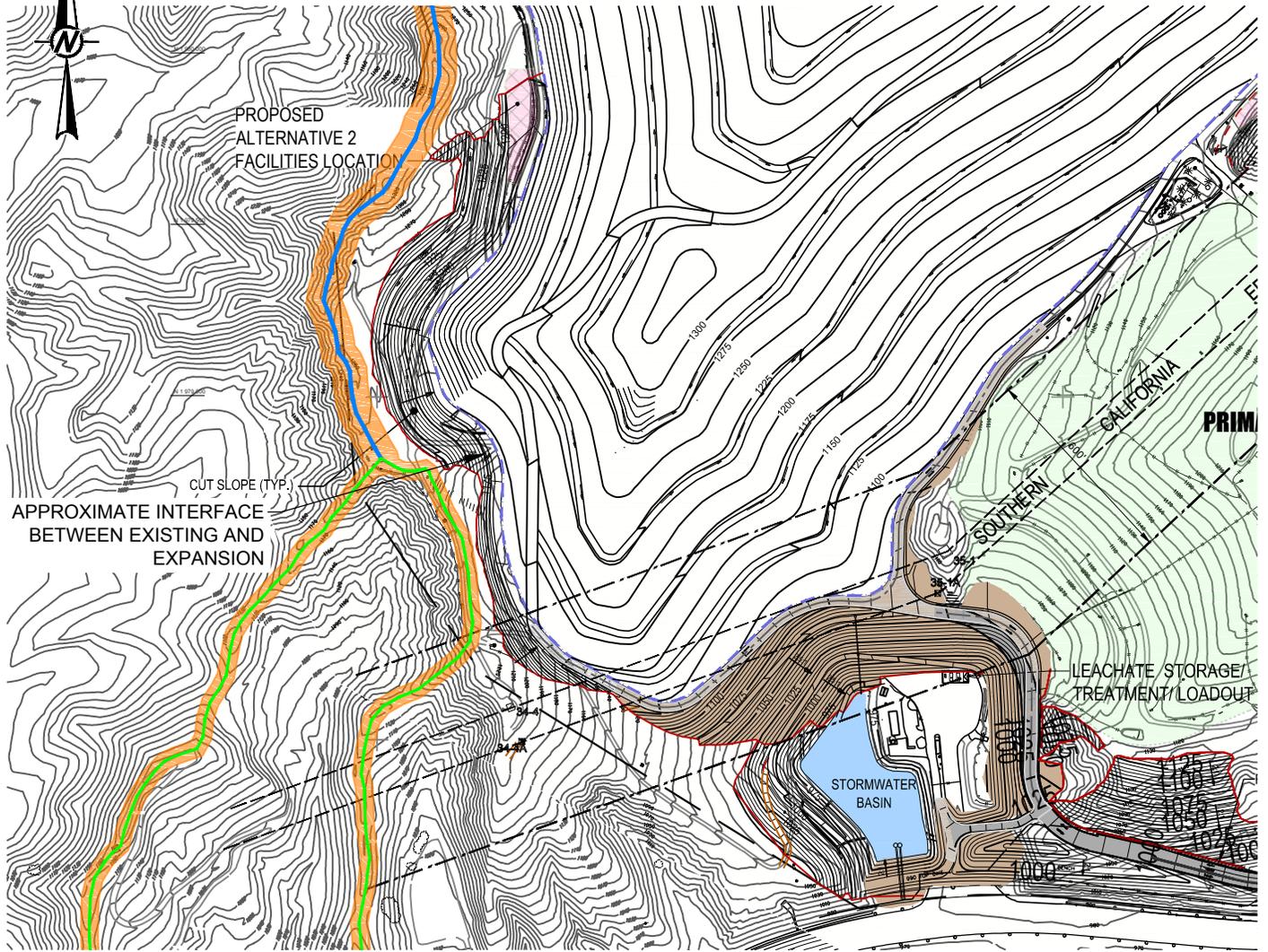
**NORTHERLY LATERAL EXTENSION AREA**

PROJECT NO.  
**1663646**

REV.  
**0**

FIGURE  
**1**

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI A



**LEGEND**

-  PRIMARY RIDGELINE
-  SECONDARY RIDGELINE
-  RIDGELINE BUFFER ZONE

**NOTE(S)**

1. RIDGELINE INFORMATION OBTAINED FROM LOS ANGELES COUNTY GIS DATA PORTAL WEBSITE ([HTTP://EGIS3.LACOUNTY.GOV/DATAPORTAL](http://EGIS3.LACOUNTY.GOV/DATAPORTAL)). DATE OF INFORMATION: OCTOBER 29, 2014. RIDGELINE BUFFER ZONE IS 50 FEET FROM PRIMARY RIDGELINE AND 25 FEET FROM SECONDARY RIDGELINE.

CLIENT  
**WASTE CONNECTIONS, INC.**  
**CHIQUITA CANYON LANDFILL**  
**LOS ANGELES COUNTY, CALIFORNIA**

PROJECT  
**CHIQUITA CANYON LANDFILL**  
**CLOSURE/POST-CLOSURE MAINTENANCE PLAN**

CONSULTANT	YYYY-MM-DD	2017-01-24
	DESIGNED	JDR
	PREPARED	JDR
	REVIEWED	RDH
	APPROVED	RDH

TITLE	PROJECT NO.	REV.	FIGURE
<b>SOUTHWESTERLY LATERAL EXTENSION AREA</b>	1663646	0	2



# CCL Master Responses

## 28. Waste Diverted

### Summary of Comments

Comments were received requesting clarification on what represents “diverted” wastes (listed in Original Draft Environmental Impact Report [EIR] Chapter 2, Project Description, Table 2-2) and how it is included (or not included) in the disposal tonnage calculations. Commenters asked whether there is a limit on the tonnage of diverted materials that can be received. Concerns were raised that the term “diverted” is misleading, as these materials are used for daily cover and still end up in the landfill. Clarification was also requested on whether the diverted materials analyzed include food waste. It was suggested that pre- and post-consumer food waste be listed under “Material Type Diverted from Waste Disposal” (Table 2-2 of Original Draft EIR, and Table 2-1 of Partially Recirculated Draft EIR) if a mixed organics composting facility will be part of the Proposed Project. Commenters asked if nonhazardous contaminated soil will be used as daily cover material or if it will be disposed. Commenters asked how it will be clear that some material is sometimes used for beneficial use while other times it will be disposed.

### Response

#### Wastes Diverted

Most waste has already been subject to a variety of offsite diversion programs before it is delivered to Chiquita Canyon Landfill (CCL) and these offsite diversion quantities are not included in the numbers reported by the landfill or discussed further here.

With respect to the comment that the term “diverted” is misleading, that term is based on state solid waste regulations. The point under these regulations is to distinguish between waste that is disposed at the landfill (waste that is buried as trash) and materials delivered to CCL that are put to a beneficial use onsite, such as alternative daily cover. Thus, “diverted from disposal” as used in the EIR refers to waste materials delivered to CCL that have been put to beneficial use onsite. For the landfill’s reporting requirements under state regulations, the sum of all beneficial uses equals “diverted from disposal”. Therefore, these materials are not being disposed of. Instead they are being re-used to serve a new beneficial purpose, as defined by state regulation. There are significant environmental benefits as well as operational and safety enhancements resulting from re-using these otherwise waste materials beneficially onsite.

All diversion activities must be in accordance with all applicable federal, state and local requirements. Table 2-1 of the Project Description included in the Partially Recirculated Draft EIR provides a list of diverted materials used for beneficial reuse at CCL, along with how the materials are typically beneficially used. The materials listed in Table 2-1 are not included in the disposal tonnage calculations because they fall under the definition of diverted waste, not disposed waste, consistent with Title 14 and Title 27 of the *California Code of Regulations* (CCR). CCL maintains records of the quantity of diverted waste received/used at the landfill as required by Title 14 CCR section 18800 et seq and Section 20686 of Title 27 CCR. This information is available for inspection by the Los Angeles County Department of Public Health (Local Enforcement Agency) and California Department of Resources Recycling and Recovery. Additionally, a monthly report that documents the daily quantity of waste disposed and materials diverted from disposal is prepared by CCL. This report is provided to the Local

Enforcement Agency, and the Val Verde Community Advisory Committee. Additionally, this information is summarized and included in the Conditional Use Permit (CUP) Biennial Reports prepared for the Los Angeles County Department of Regional Planning.

Section 20686 of Title 27 CCR states that the quantity of beneficial reuse materials should be no more than necessary to meet specific uses at CCL, in accordance with engineering, industry guidelines, or other standard practices. The current CUP does not currently limit the tonnage of diverted materials that can be received. Condition 9d-9f of CUP No. 89-081(5) states:

- d. “The net tonnage placed in the landfill shall not exceed 30,000 tons per week (5,000 tons per day average based upon 6 working days per week).
- e. “The net tonnage of waste placed in the landfill on any given day shall now exceed 6,000 tons.”
- f. “Net tonnage shall not include:
  - o Clean dirt or other approved materials used for daily cover, to cover and prepare interim and final slopes, or for other construction purposes; and
  - o Waste processed and put to beneficial use on the landfill or separated or otherwise diverted from the waste stream and exported from the landfill for the purpose of recycling or reuse, in accord with the restrictions of Condition 9j and the agreement entered into pursuant to Part II of the attached monitoring program, and including waste handled through any materials recovery facility, hazardous waste facility or composting facility within the restrictions set forth in Condition 10, 11, and 12”.

Diverted waste is used for daily cover, temporary slope stabilization, erosion control, fugitive dust control, the methane gas pipeline and liner system, and constructing all-weather surfaces onsite, all of which are allowable beneficial uses pursuant to Section 20686 of Title 27 CCR. CCL regularly uses mulched green waste for soil stabilization on intermediate side slopes of the disposal area. The type of materials diverted is highly variable and depends on local activities that would produce these materials.

As described in Topical Response #34, Beneficial Use, the use of diverted waste at CCL has direct and tangible benefits for the surrounding communities and region. For example, using diverted construction and demolition products to build all-weather surfaces reduces dust and water use. Using shredded or mulched green waste for side slopes provides erosion control, reduces dust and water use, and has been shown to directly reduce landfill odors.

The combination of waste diversion, mixed organic processing/composting operation, Household Hazardous Waste Facility, and future waste conversion at CCL will continue to provide a robust contribution to landfill waste diversion programs that are relied upon by many local cities and communities in achieving state-mandated goals, including Assembly Bill 939 (current 50 percent diversion goal) and Senate Bill 341 (75 percent diversion by 2020). All materials received at CCL are tracked by source and reported by origin, so that the contributing communities can track their own waste diversion success.

Additional information about material diverted from waste and used beneficially at CCL and environmental benefits of using such materials can be found in Topical Response #34, Beneficial Use.

### **Daily Cover**

With respect to the concern regarding distinguishing materials between beneficial use and disposal, CCL’s practices are consistent with state regulations regarding diversion of cover materials. Public Resources Code Section 41781.3 establishes that alternative daily cover use is considered “diversion through recycling” and is therefore not considered waste and is not calculated as part of the disposal tonnage for the Proposed Project, as noted above.

CCL is required by law (Title 27, CCR, section 20680) to cover disposed solid waste with “a minimum of six inches of compacted earthen material at the end of each operating day, or at more frequent intervals if necessary, to control vectors, fires, odors, blowing litter, and scavenging”. One method of meeting this requirement is to re-use materials which are already coming to the site for this purpose. Therefore, these materials are not being disposed of, instead they are being used to serve a new beneficial purpose, as defined by state regulation. Furthermore, Condition 9i of CUP No. 89-081(5) states:

- i. “The permittee shall operate the landfill in a manner which maximizes the amount of waste which can be placed within the available approved volume, including but not limited to the following: Utilize waste materials received and processed at the landfill, such as shredded green waste, as a supplement to daily, intermediate and final cover, to the extent deemed technically feasible and acceptable by regulatory agencies”.

The Proposed Project will continue to meet Condition 9i of the CUP by utilizing waste materials received and diverting these materials for beneficial reuse.

### **Food Waste**

Table 2-2 of the Original Draft EIR (Table 2-1 of the Partially Recirculated Draft EIR) was not updated to include pre- and post-consumer food waste, because it is not a material that would be diverted from waste disposal and put to beneficial use as part of landfill operation. Although food waste was not identified in Table 2-2, it was considered as part of the “composting” category when evaluating potential truck trips and traffic volume for the project. Specifically, food waste may be included as part of the 560 tons per day requested for a mixed organics processing/composting facility, if approved. If food waste were to be received at CCL as part of nonsource sorted municipal solid waste, it would be part of the 12,000 tons per day disposal limit, and not used beneficially.

### **Nonhazardous Contaminated Soil**

Nonhazardous contaminated soil can be used as daily cover material, used other ways beneficially or disposed of, in accordance with Waste Discharge Requirement Order No. R4-11-0052, issued by the California Regional Water Quality Control Board, Los Angeles Region. The determination to beneficially use the soil or to dispose of it is made when the waste is received, and is contingent upon a variety of factors. Generally, if the nonhazardous contaminated soil includes litter, or has an odor, it is treated as waste. Otherwise, the nonhazardous contaminated soil may be used beneficially. As noted above, in accordance with Title 14 CCR section 18800 et seq, CCL reports the amount and use of all materials received at the landfill, whether they are disposed or beneficially reused.

# CCL Topical Responses

## 29. Wastes to be Disposed and Waste Screening and Acceptance Program

### 29a. Wastes to be Disposed

#### Summary of Comments

Commenters requested clarification on the types of waste that will be disposed at the landfill. Specifically, commenters questioned whether sludge and sludge components (or bio solids), friable/non-friable asbestos, and radioactive and liquid waste will be prohibited from being accepted as part of the Proposed Project. Claims were made that Chiquita Canyon Landfill (CCL) plans to accept large amounts of waste from the Rocketdyne site in Simi Valley. One commenter cited a report that shows CCL as being a company which will accept the "cleaned-up dirt".

#### Response

CCL is a Class III solid waste disposal landfill. Class III means that it is a municipal (city or town) landfill that is not authorized to accept hazardous waste. As such, only nonhazardous solid wastes are permitted to be disposed.

The Project Description included in the Partially Recirculated Draft EIR (Section 2.2.3.1, Waste to be Disposed) was updated to clarify that the Proposed Project would accept, as waste to be disposed, nonhazardous solid waste, excluding sludge, as described in 27 *California Code of Regulations* (CCR) Section 20220(c).

The definition of nonhazardous solid waste from 27 CCR Section 20220 (also defined in Waste Discharge Requirement Order No. 98-086) is:

Nonhazardous solid waste includes all putrescible and nonputrescible solid, semi-solid, 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 (except e-wastes), manure, vegetable or animal solid and semi-solid wastes, and other discarded waste (whether of solid or semi-solid consistency); provided that such wastes do not contain wastes which must be managed as hazardous wastes, or wastes which contain soluble pollutants in concentrations which exceed applicable water quality objectives or could cause degradation of waters of the state (i.e., designated waste).

CCL could accept any of the above materials for waste disposal, but currently does not accept sludge, and the Proposed Project excludes the acceptance of sludge.

Please see Topical Response #4, Conditional Use Permit Compliance, for a discussion of historical and current disposal of sludge at CCL.

The average person generates approximately 4.3 pounds of waste per day. In 2014, the U.S. Environmental Protection Agency estimated that about 258 million tons of Municipal Solid Waste were generated in the United States. Of the 258 million tons of Municipal Solid Waste (generated in the United States in 2014, about 136 million tons were disposed in a landfill, such as CCL.

In 2014, CalRecycle updated its Statewide Waste Characterization Study. This study found that the ten most prevalent material types in California’s overall disposed waste system were:

- Food – 18.1 percent
- Lumber – 11.9 percent
- Remainder/Composite Paper (for example, paper towels, photographs) – 7.5 percent
- Bulky Items – 4.4 percent
- Remainder/Composite Organic (for example, leather, cork, garden hoses) – 4.3 percent
- Textiles – 4.0 percent
- Other Miscellaneous Paper – 3.9 percent
- Leaves and Grass – 3.8 percent
- Uncoated Corrugated Cardboard – 4.8 percent
- Prunings and Trimmings – 3.1 percent

This means that roughly two-thirds of the material in California’s waste system are commonly found in our homes and yards. Another 20 percent is made up of “inerts and other”, which includes materials used for construction such as wood, concrete, and roofing materials. Metals, glass, and other mixed materials make up the remainder. Several commenters raised the issue of disposal of radioactive waste. The ongoing environmental cleanup of the Santa Susana Field Laboratory site (referred to as the Rocketdyne site by the commenters) is regulated by the California Department of Toxic Substances Control. It is not known when, where, or if the soil will be transported offsite. CCL is prohibited from taking radioactive waste and has radiation detectors at the site entrance to identify such wastes. A detailed discussion of the Waste Screening and Acceptance Program implemented at the landfill is provided under Topical Response #29b. CCL will continue to implement all load checking requirements as required by federal, state, and local regulations, and Waste Connections, Inc.’s internal policies.

## **29b. Waste Screening and Acceptance Program**

### **Summary of Comments**

Comments were received from the City of Santa Clarita regarding the landfill’s compliance with preventing hazardous waste from being accepted at the landfill. Specifically, the City recommended the inclusion of the following mitigation measures to provide public assurance of ongoing compliance with this prohibition:

- HM1: Continue to implement a rigorous load checking program in accordance with RWQCB and Solid Waste Facility Permit requirements to ensure no illicit hazardous materials are accepted for disposal.
- HM2: Continue to implement all load checking requirements of California Department of Toxic Substances Control and the California Department of Public Health to ensure no sewer sludge or radioactive materials are accepted for disposal.
- HM3: Utilize recognized best management practices (BMP) for temporary storage and handling of household hazardous waste prior to shipping materials to recycling facilities or approved hazardous waste disposal sites.

### **Response**

The City of Santa Clarita’s recommended mitigation measures are operating practices already required for a Class III landfill via various federal, state, and local regulatory mechanisms and do not reflect measures needed to mitigate potentially significant impacts. The recommended measures are implemented through the Waste Screening and Acceptance Program currently in place at CCL.

The Waste Screening and Acceptance Program is designed to prevent prohibited wastes from being disposed at CCL. A discussion of the existing Waste Screening and Acceptance Program follows.

### **Federal, State, and Local Regulations**

The U.S. Environmental Protection Agency (EPA) establishes overall regulatory direction by setting minimum nationwide standards for protecting human health and the environment. The responsibility for the actual planning and direct implementation of solid waste programs, under Subtitle D, remains largely with state and local agencies. Pursuant to Title 27 of the California Code of Regulations, Section 20220 (27 CCR 20220), the State Water Resources Control Board (SWRCB) requires a load-checking program to be implemented at landfills. In addition, the California Regional Water Quality Control Board, Los Angeles Region (RWQCB), adopted Order No. R4-2011-0052, which establishes waste discharge requirements for the disposal of nondesignated/nonhazardous contaminated soils and the onsite use of nonhazardous contaminated soils or related wastes. The Order requires that a waste acceptance program be developed and approved by the RWQCB in order to accept non-designated/nonhazardous contaminated soils. The waste acceptance program includes procedures for obtaining and approving soil profiling information, testing procedures for waste constituents accepted, site-specific threshold values for all appropriate wastes accepted for either disposal or reuse, and a description of the personnel responsible for implementing the plan. In compliance with this Order, a waste acceptance program specific to the acceptance of nondesignated/nonhazardous contaminated soils and related wastes is implemented at CCL. This program is an integral part of the overall Waste Screening and Acceptance Program at CCL and is implemented in coordination with the overall program.

In addition to the regulations above, Part III of CCL's existing Conditional Use Permit requires CCL to implement a Hazardous Waste Exclusion Program.

### **Waste Screening and Acceptance Program Elements**

Specific elements of the program include:

- Notifying customers of applicable policies and procedures
- Specifying methods for determining the acceptability of wastes
- Providing a waste screening program for incoming wastes
- Describing other measures to deter the disposal of prohibited wastes

### **Customer Notification Procedures**

The generator has the responsibility to determine whether a waste is appropriate for disposal at a Class III nonhazardous waste landfill. The generator is the most familiar with the process generating the waste and should be familiar with the federal, state, and local regulations that govern their generating process. This is not always the case. Therefore, the waste hauler and the receiving disposal facility must also be knowledgeable of the wastes with which they are involved. The customer notification program is designed to describe and to explain to customers the policy and procedures of the waste acceptance program.

### **Pre-qualification Procedures**

CCL's Waste Acceptance Program includes a prequalification procedure for special wastes, which are typically wastes derived from industrial sources or remediation activities. Wastes that would require prequalification are those that are typically from one source (as opposed to numerous sources as with municipal refuse) and are not generated over a long time period (the waste stream is usually connected to an event or project). Each generator of a special waste is required to complete and certify a Special

Waste Profile form prior to the initial shipment of their wastes to CCL. Waste Connections, Inc.'s Special Waste Coordinator (SWC) evaluates the profile form along with other required documentation to determine whether the waste is acceptable. The generator-provided documents may include the following as appropriate:

- Certified analytical reports and chain-of-custody documentation from a California Department of Health Services Accredited Environmental Laboratory
- Special waste (nonhazardous) manifest(s)
- Material Safety Data Sheet(s)
- Description of the process generating the waste

The SWC will determine whether the generator has provided correct and sufficient information and whether the waste is acceptable for disposal at CCL. The SWC will communicate with the generator regarding specific concerns, or missing or incomplete information. The generator must certify by signature that the information provided on the Special Waste Profile Form is true and correct.

The generator may be required to collect additional samples, and/or have additional chemical analyses performed. Wastes are not accepted at CCL until the proper documentation has been obtained and fully evaluated.

Following completion of the prequalification process, the wastes are approved for disposal at CCL. Upon arrival at the site, the driver is required to produce a copy of the Non-Hazardous Waste Manifest signed by the generator. The form will be checked by scalehouse personnel who will ensure that the form carried by the driver(s) matches the form on file. If scalehouse personnel determine that the driver does not have the appropriate documentation, the driver will be asked to move to a staging area while management personnel are contacted.

### **Waste Screening**

Unlike vehicles that haul industrial and construction/demolition debris, which are generally from one source, residential and commercial hauling vehicles generally contain wastes from several locations (e.g., houses, apartments, shopping centers, etc.). As a result, the prequalification program cannot be effectively applied to preclude the acceptance of hazardous wastes. Therefore, a Waste Screening Program is implemented at CCL to identify hazardous and other prohibited wastes that may be delivered to the landfill.

This program has been implemented in response to the requirements set forth in the 40 CFR and 27 CCR. The Waste Screening Program includes random inspections of incoming loads, keeping a record of inspections, training facility personnel, and notification of the state director (chief administrative officer of the state agency responsible for implementing the state municipal solid waste permit program or other system of prior approval) if a regulated or hazardous waste is discovered at the facility disposal area. It should be noted that approximately 70 percent of the waste disposed at CCL originates from transfer stations. Because each transfer station implements its own waste screening program, the majority of waste disposed at CCL has been screened before it arrives at CCL.

At a minimum, five loads of waste per day are inspected. An inspection involves discharging the waste load and viewing the contents prior to actual disposal, thereby allowing the inspector to reject wastes deemed unacceptable. Inspections are performed at or adjacent to the landfill working face.

**Best Management Practices**

If hazardous or other prohibited wastes are found in a vehicle at the scalehouse, landfill personnel will refuse to accept the entire load. When a load is rejected by CCL personnel, they will attempt to determine the original source of the load by information gathered from the driver of the vehicle. This information is used to notify the generator, notify appropriate agencies, or may be used to identify any subsequent loads for spot-checking.

If hazardous or other prohibited wastes are discovered, the wastes are handled by trained CCL personnel in a manner consistent with applicable local, state, and federal hazardous waste generator regulations. The hazardous waste storage area is a locked, secure area near the landfill maintenance building. Incompatible wastes are stored separately. CCL contracts with a licensed hazardous waste hauler who containerizes, labels, and marks the wastes prior to transporting offsite.

# CCL Topical Responses

## 30. Water Quality

### Summary of Comments

Comments were received about potential impacts to water quality, and potential related impacts to biological resources, with particular focus on run-off, the Santa Clara River, and groundwater. A comment was also received indicating that a third party groundwater evaluation should be completed, including monitoring of ground and surface water runoff to evaluate impacts to private wells in Hasley Canyon and Val Verde. It was stated that the proposed expansion puts the landfill too close to the Santa Clara River and it was questioned how Chiquita Canyon Landfill (CCL) will prevent contaminants in run-off from being carried into the Santa Clara River. Other comments stated that the groundwater supply for portions of the Santa Clarita Valley has been contaminated with perchlorate and that cancer-causing Volatile Organic Compounds (VOCs) have been detected in the water supply. It was suggested that the water quality section should have disclosed the potential health risks from the type of VOC's found in the monitoring wells. Comments were made that CCL has not been in compliance with the National Pollutant Discharge Elimination System (NPDES) Permit requirements and that CCL has already had a detrimental effect on storm water quality. It was suggested that expanding the landfill will have a much more detrimental effect on water quality than is stated. Comments suggested that the Environmental Impact Report (EIR) should include mitigation for potential releases into groundwater, including reference to groundwater extraction as a corrective action, since releases have already occurred from the unlined Primary Canyon.

### Response

Surface drainage at CCL is controlled by diversion berms, drainage channels, overside drains, and sedimentation basins. Exposed soil on slopes is covered with shredded green waste, and final covers are vegetated to control erosion. CCL manages stormwater from the landfill in compliance with the federal Clean Water Act, which guards against contamination that could come from the landfill to surface waters, including the Santa Clara River. As described in Section 2.2.8.6, Surface Water Monitoring, of the Partially Recirculated Draft EIR, CCL has a NPDES Permit from the Regional Water Quality Control Board (RWQCB) as required by the Clean Water Act that addresses specific design and applicable water quality standards at the facility. CCL manages, monitors, and discharges stormwater in accordance with the NPDES permit and the following additional plans that are required under the NPDES Permit: Stormwater Pollution Prevention Plan, the Stormwater Monitoring Program, and the Spill Prevention, Control, and Countermeasure Plan. CCL implements the site specific best management practices required by these plans.

Potential impacts to Water Quality for the Proposed Project are addressed in the Original Draft EIR Chapter 7, Water Quality. Specifically, the Proposed Project would minimize impacts to surface and groundwater quality because it would be implemented in compliance with NPDES requirements, *California Code of Regulations* Title 27 requirements, and Orders and waste discharge requirements (WDR) issued by RWQCB. This includes preparing and implementing a Stormwater Pollution Prevention Plan and Stormwater Monitoring Program, and their associated best management practices, in accordance with the General Permit issued under SWRCB Order No. 2014-0057-DWQ, NPDES

requirements, and RWQCB Order No. R4-2011-0052. In addition, the Proposed Project will meet or incorporate the siting and design features in accordance with Title 27, Chapter 3, Subchapter 2, and will comply with the Los Angeles County Low Impact Development Ordinance, as described in Section 7.1.1.1, Proposed Project, of the Original Draft EIR.

Chapter 8, Biological Resources, of the Partially Recirculated Draft EIR contains an evaluation of potential water quality impacts to biological resources.

With regard to the proximity of CCL to the Santa Clara River, the Proposed Project does not move the property boundary of CCL any closer to the Santa Clara River. One part of the proposed lateral expansion moves the waste footprint to the north and east within the landfill property; the other part of the proposed lateral expansion moves the waste footprint slightly to the south within the landfill property, but not as far south as the existing closed Primary Canyon Landfill. The waste footprint is well within the control features of the landfill that prevent impacts to the Santa Clara River.

Water quality monitoring for the protection of groundwater at CCL, both for the existing landfill and the proposed expansion, is required by both State and Federal regulations, and is under the regulatory authority of the RWQCB. California water quality monitoring requirements are contained in Title 23, Chapter 15, Article 5, of the California Code of Regulations. Please see Master Response #10, Environmental Monitoring, for information about the existing and proposed water quality monitoring program.

The groundwater monitoring and remediation program is being implemented and is protective under oversight of the RWQCB. As described in detail in the Chapter 7, Section 7.6.1.4, Groundwater Quality Monitoring Results of the Original Draft EIR, groundwater monitoring for wells in the Evaluation Monitoring Plan and the corrective action program have VOC concentrations measured at low levels, below method detection limits. The extensive Detection Monitoring Program well network showed no impacts to groundwater.

The discussion referenced in Chapter 5, Geology and Hydrology, Section 5.7.2.6 of the Original Draft EIR is about whether the Proposed Project would deplete groundwater supplies as part of a corrective action program. The releases mentioned by the commenter are correctly attributed to the unlined Primary Canyon, and would not be expected as part of the Proposed Project, which includes a liner system that meets or exceeds the standards of Title 27 California Code of Regulations 20340, WDR Order No. 93-062, implementing the United States Environmental Protection Agency Subtitle D requirements, and WDR Order No. 98-086. Therefore, a release to groundwater is not an anticipated potential impact of the Proposed Project and mitigation is not required or needed.

# CCL Topical Responses

## 31. Los Angeles County Code Section 22.04.110 Waiver

### Summary of Comments

Comments were made regarding the County of Los Angeles' issuance of a waiver pursuant to Los Angeles County Code (County Code) section 22.04.110. Commenters stated that Chiquita Canyon Landfill (CCL) should not be permitted to operate because it reached its total maximum capacity authorized under its 1997 Conditional Use Permit (CUP), and that Los Angeles County should not have issued such a waiver. In addition, comments were made stating that an addendum to the previously certified Final Environmental Impact Report (EIR) should not have been issued, and that a subsequent EIR was instead required.

### Response

#### Issuance of Waiver

The Director of the Los Angeles County Department of Regional Planning (LADRP) on March 17, 2016, issued a waiver to CCL pursuant to Los Angeles County Code Section 22.04.110 (Waiver). The Waiver authorized the continued operation of CCL in the event that the total maximum tonnage capacity allowed by Condition 46 of the existing CUP was reached before the environmental review and public hearing process for a new CUP could be completed.

CCL is operating currently pursuant to CUP No. 89-081, approved in 1997, which authorized a total capacity of 23 million tons within a defined disposal "envelope." Daily and weekly tonnage limits are also imposed. LADRP is reviewing CCL's application for a new CUP, which seeks, in part, to expand CCL's capacity, including, but not limited to, an increase in daily, weekly and total disposal tonnage and an expansion of the horizontal and vertical "envelope" within CCL where waste would be deposited.

CCL requested the Waiver based upon its determination that it would likely reach its total permitted capacity of 23 million tons before the pending CUP application process is complete. CCL did not anticipate the need to increase its permitted daily or weekly tonnage limits or the approved disposal "envelope" and the Waiver requires that those capacity limits not be exceeded.

#### LADRP Findings

The LADRP Director determined that the Waiver should be issued because interim continuation of CCL operation is consistent with the General Plan and the Santa Clarita Valley Area Plan and serves the public convenience and welfare. Closure of CCL during the processing of the current CUP application would result in hardships to waste haulers and local communities, including price increases.

Furthermore, LADRP found that avoiding the temporary closure of CCL will achieve important policy objectives. The interim continuation of CCL operations is consistent with General Plan Policy PS/F 5.1 because it will maintain an efficient, safe and responsive waste management system that reduces waste while protecting the health and safety of the public. Although there are no geographic constraints on the sources of waste collected by CCL, it predominately serves the Santa Clarita Valley and surrounding communities. LADRP found that CCL is forced to close during the processing of CUP No. 2004-00042, waste from these communities will need to be diverted to other landfills located further away, which will increase transportation distances, creating traffic and regional air quality impacts, increasing

greenhouse gas emissions, and increasing costs that will be passed down to County residents. In addition, other landfills may impose out-of-area surcharges, further increasing costs. Overall, closure of CCL during the processing of CUP No. 2004-00042 would result in inefficiencies in the County's waste management system

#### Interim Continuation of CCL Operations Is Consistent with the Santa Clarita Valley Area Plan

The LADRP found that the interim continuation of CCL operations is consistent with the Land Use Element of the Santa Clarita Valley Area Plan, a component of the General Plan. CCL is located within the Community Serving land use designation, which allows landfills.

#### Interim Continuation of CCL Operations Serves the Public Convenience and Welfare

LADRP found that the interim continuation of CCL operations serves the public convenience and welfare. Specifically, LADRP stated that denial of the Waiver could result in temporary closure of CCL, which would result in increased traffic and regional air quality impacts; increased greenhouse gas emissions; and increased costs that would be passed down to Los Angeles County residents. County residents served by CCL would no longer have convenient access to waste disposal services and would no longer benefit from competitive pricing for those services. Los Angeles County stated that CCL's ongoing compliance with the operating conditions of CUP No. 89-081, except with respect to the 23-million-ton maximum set forth in the CUP, ensures that CCL is operated in a manner that protects the health, safety, and welfare of Los Angeles County residents.

#### Terms of the Waiver

The Waiver requires CCL to abide by the conditions of the CUP, except that it can continue to operate in the event that it exceeds the maximum capacity stated in its current CUP, subject to the terms and limitations of the Waiver. Terms of the waiver include the following:

- CCL must be operated in compliance with all applicable provisions of the County Code, and with applicable State and federal laws and regulations
- Except with respect to the 23-million-ton maximum set forth in its current CUP, CCL must comply with all conditions of CUP No. 89-081, including but not limited to the daily and weekly net tonnage restrictions
- Waste disposal must take place only within the horizontal and vertical footprint (the waste disposal envelope with the maximum elevation of 1,430 feet) depicted in the existing CUP, and shall not exceed 29 million tons
- The CCL operator must cooperate fully and expeditiously with LADRP in the processing of the pending CUP application
- The CCL operator must provide LADRP with weekly reports detailing, to the satisfaction of the Director, the daily disposal rates within the preceding week, the total amount in tons of waste disposed within CCL, and the remaining capacity within the approved waste disposal envelope
- The CCL operator must cooperate with LADRP's Zoning Enforcement staff to address ongoing concerns related to the operation of CCL

The Waiver shall cease to be effective upon the earlier of the withdrawal, approval or denial of the pending CUP application, July 31, 2017, or the Director's revocation of the Waiver.

Addendum to the Previously Certified 1997 Final EIR

Los Angeles County determined that no circumstances exist that would require the preparation of a subsequent environmental impact report under *California Environmental Quality Act Guidelines* Section 15164. The Addendum to the 1997 Final EIR was issued correctly because, as it states, the Waiver will not result in increased environmental impacts compared to the CCL expansion evaluated in the 1997 Final EIR. Although, under the waiver, CCL may exceed its 23-million-ton capacity, doing so will not increase the impacts of the continued operation of CCL, as operational efficiencies have resulted in space remaining within the vertical and horizontal envelope of CCL beyond 23 million tons, so that the additional tonnage can be accommodated within the vertical and lateral envelope of space already evaluated in the 1997 Final EIR. As a result of the Waiver, CCL may continue to dispose of waste within the existing approved envelope on a temporary basis during the CUP application process, which will not increase CCL's impacts.

# CCL Topical Responses

## 32. Establishment of Baseline

### Summary of Comments

Comments were made regarding the methodology for determining the baseline conditions against which the environmental impacts of the proposed project are compared. Commenters stated that using the year 2011 as the baseline does not reflect the current operation of Chiquita Canyon Landfill (CCL), and is thus misleading. Commenters also stated that the use of the year 2011 and use of only average data is misleading because it does not reflect peaks or averages in the landfill's operation since that time, and only provides a snapshot of operations in 2011.

### Response

The Los Angeles County Department of Regional Planning (LADRP) selected the year 2011 for the project baseline because the Notice of Preparation (NOP) for the CCL Master Plan Revision (Proposed Project) was issued in 2011. This conforms with California Environmental Quality Act (CEQA) Guidelines Section 15125(a), which states that, "an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published" and that this environmental setting will "normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant." Under CEQA Guidelines Section 15125(a), environmental conditions are normally described as they exist when the NOP is published or, if an NOP has not been published, at the time the environmental analysis begins. Because the NOP was issued in 2011, LADRP selected 2011 as the project baseline physical conditions by which it determined whether environmental impacts are significant.

The baseline condition against which an Environmental Impact Report (EIR) is evaluated under CEQA is derived from the conditions in place at the time the NOP is filed. As the California Supreme Court has noted in one of the leading decisions on the determination of the baseline for environmental impact review:

A long line of Court of Appeal decisions holds... that the impacts of a proposed project are ordinarily to be compared to the actual environmental conditions existing at the time of CEQA analysis, rather than to allowable conditions defined by a plan or regulatory framework. This line of authority includes cases where a plan or regulation allowed for greater development or more intense activity than had so far actually occurred, as well as cases where actual development or activity had, by the time CEQA analysis was begun, already exceeded that allowed under the existing regulations. In each of these decisions, the appellate court concluded the baseline for CEQA analysis must be the 'existing physical conditions in the affected area' (Environmental Planning Information Council v. County of El Dorado, *supra*, 131 Cal.App.3d at p. 354...), that is, the 'real conditions on the ground' (Save Our Peninsula Committee v. Monterey County Bd. of Supervisors, *supra*, 87 Cal.App.4th at p. 121; see City of Carmel-by-the-Sea v. Board of Supervisors, *supra*, 183 Cal.App.3d at p. 246...), rather than the level of

development or activity that could or should have been present according to a plan or regulation.<sup>1</sup>

Therefore, the selection of 2011 as the project baseline by which LADRP determined whether environmental impacts are significant is consistent with the California state law, as it reflects existing physical conditions in the affected area at the time that the NOP was issued. In this respect, and consistent with California state law, the EIR evaluated potential impacts of the Proposed Project, that is activities that are a change to the project baseline.

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<sup>1</sup> *Communities For A Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 320-321.

# CCL Topical Responses

## 33. Recirculation

### Summary of Comments

Comments suggesting or relating to recirculation of the environmental analysis for the project were submitted both in response to the original Draft Environmental Impact Report (EIR) as well as the Partially Recirculated Draft EIR. A number of comments were submitted relating to the analysis of biological resources, air quality, greenhouse gas emissions and climate change, and project alternatives; as noted below in the response, these chapters of the Draft EIR were revised and recirculated, in part in response to these comments. In addition, following circulation of the Partially Recirculated Draft EIR, some commenters suggested that a further recirculation is required based on claims about additional new information.

### Response

Portions of the impact analysis in the Draft EIR were in fact recirculated. Commenters who submitted comments regarding the biological resources, air quality, greenhouse gas emissions and climate change, and project alternatives in the original Draft EIR are advised to review the chapters pertaining to those issue areas in the Partially Recirculated Draft EIR.

Los Angeles County recirculated Section 8, Biological Resources; Section 11, Air Quality; Section 12, Greenhouse Gas Emissions and Climate Change; and Section 18, Project Alternatives, in the Partially Recirculated Draft EIR. In accordance with *California Environmental Quality Act (CEQA) Guidelines* Section 15088.5(f)(2), the Lead Agency is required only to respond to (i) comments received during the circulation period on the Original Draft EIR that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the Original Draft EIR that were revised and recirculated. As a result, the Lead Agency is not required to respond to comments that relate to chapters of the Original Draft EIR, which have been revised and recirculated in the Partially Recirculated Draft EIR. The Lead Agency refers those who provided comments regarding the chapters of the DEIR that are noted above to the biological resources, air quality, greenhouse gas emissions and climate change, and project alternative chapters of the Partially Recirculated Draft EIR.

In addition, comments regarding the biological resources, air quality, greenhouse gas emissions and climate change, and project alternative chapters of the Original Draft EIR have been noted for the record and provided to the Los Angeles County Planning Commission and Board of Supervisors for consideration.

Other commenters stated that additional chapters of the EIR, beyond those described above, should have been recirculated. However, additional chapters of the EIR were not recirculated because no significant new information requiring recirculation was added to the EIR after public notice for public review of the Draft EIR. Under CEQA Guidelines Section 15088.5, recirculation is required if an EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.

Under Section 15088.5 of the CEQA Guidelines, “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition vs. Fish and Game Com. (1989) 214 Cal.App.3d 1043)

CEQA Guidelines 15002(a)1-4.

Significant new information, as outlined in the examples above, is not present here, and as a result, recirculation of additional portions of the EIR is not necessary under CEQA Guidelines Section 15088.5. Los Angeles County has reviewed the recirculated draft and comments, and concluded that there are no new significant effects not previously identified. In addition, Los Angeles County has reviewed the recirculated draft and determined that no substantial increase in the severity of an environmental impact would result without mitigation measures. Furthermore, the County has not declined to adopt a feasible project alternative or mitigation measure that would clearly lessen the environmental impacts of the Proposed Project. Finally, the Draft EIR was not so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. As a result, Los Angeles County has concluded that recirculation is not required. No new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented. In addition, no substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance. Furthermore, there is no feasible project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project. As a result, recirculation of additional portions of the EIR is not necessary.

# CCL Topical Responses

## 34. Beneficial Use

### Comment Summary

Comments were received requesting clarification regarding beneficial use materials – what they are and how they are used at Chiquita Canyon Landfill (CCL).

### Response

Three types of material are received at CCL: waste for disposal, beneficial use material, and soil (clean and contaminated).

Waste for disposal, commonly referred to as garbage or trash (also: “waste material” or “waste disposed” in various CCL permits) consists of nonhazardous solid wastes, as defined in CCL’s Solid Waste Facility Permit issued by the California Department of Resources Recycling and Recovery (CalRecycle) and the Waste Discharge Requirements issued by the Regional Water Quality Control Board (RWQCB), which are disposed of through the landfill process at CCL. Waste for disposal is considered by both CalRecycle and the Los Angeles County Department of Public Works as waste materials that are included when calculating tons of waste disposed against CCL’s permit limit (currently 6,000 tons per day and 30,000 tons per week; proposed 12,000 tons per day and 60,000 tons per week).

Beneficial use material consists of all material (with the exception of soils) diverted from disposal that is used beneficially onsite. Beneficial use materials may include concrete/asphalt, asphalt grindings, processed construction and demolition material, treated auto shredder waste, shredded tires, shredded green waste, and materials recovery facility/construction and demolition fines.

Soil consists of both clean soil and contaminated soil.

Clean soil is not a waste material, nor is it a material diverted from the waste stream. Clean soil is not regulated as a waste by the RWQCB. Because clean soil is not a waste material, it is not diverted from disposal, nor can it be considered a beneficial use material. Clean soil is in a category all by itself.

Contaminated soil, pursuant to Section 13263(a) of the California Water Code, is a waste material that requires regulation by the RWQCB. Depending on what happens to contaminated soil at the site, it may be disposed (and consequently counted as waste disposed), or it may be used beneficially. If contaminated soil is used beneficially at CCL, it is considered diverted from disposal, in that it is not included in CCL’s waste tonnage disposal limits, but it is not classified as a beneficial use material.

The subsections below provide an overview of the regulatory definition of beneficial use, beneficial reuse at CCL (materials types and uses), environmental benefits of beneficial reuse, and compliance benefits of beneficial reuse. For the purposes of this Topical Response, the terms “beneficial use” and “beneficial reuse” mean the same thing and are used interchangeably.

### Beneficial Use, Defined

Beneficial use at landfills is regulated through Title 27 CCR, Section 20686, as shown below:

*Section 20686. Beneficial Reuse*

Beneficial reuse of solid wastes at a solid waste landfill shall include, but not be limited to, the following: alternative daily cover, alternative intermediate cover, final cover foundation layer, liner operations layer, leachate and landfill gas collection system, construction fill, road base, wet weather operations pads and access roads, and soil amendments for erosion control and landscaping. Alternative daily cover reuse shall comply with the requirements of section 20690. Alternative intermediate cover reuse shall comply with the requirements of section 20700. Other beneficial reuse shall comply with the following requirements:

- (a) Beneficial reuse shall be restricted to those solid wastes appropriate for the specific use and in accordance with engineering, industry guidelines, or other standard practices specified in the Report of Disposal Site Information as required by section 21600(b)(6).
- (b) Beneficial reuse shall be restricted to quantities of solid wastes no more than necessary to meet the minimum requirements of (a). Should the CIWMB determine that an owner or operator violated this standard, the owner or operator shall revise the applicable reports to reflect the overuse as disposal, and pay the required Board of Equalization (BOE) disposal tipping fees for the amount of overuse.
- (c) Storage and handling of solid waste and derived materials for beneficial reuse shall be conducted in a manner to protect public health and safety and the environment, and control vectors, fires, odors, and nuisances.
- (d) The owner or operator shall maintain a record of beneficial reuse in accordance with Title 14, California Code of Regulations, section 18800 et seq. The records shall be available for inspection by authorized representatives of the EA, the local health agency, and the CIWMB during normal business hours and retained in the operating record near the site or in an alternative location approved by the EA.

## **Beneficial Reuse at CCL**

Final EIR Section 2.2.3.3, Beneficial Use Material, describes the type and volume of material diverted from disposal and put to beneficial use at CCL. Final EIR Table 2-1, Beneficial Use Materials, Typical Use at CCL, and Largest 1-Day Total of Each Type, identifies the beneficial use material types and typical beneficial use at CCL. Beneficial use materials include concrete/asphalt, asphalt grindings, processed construction and demolition (C&D) material, treated auto shredder waste (TASW), shredded tires, shredded green waste, and materials recovery facility (MRF)/C&D fines. These material types, how they are used at CCL, and the environmental benefits of the use are described below. Additional information can be found in Appendix N, Beneficial Reuse.

### **Concrete/Asphalt**

Concrete and asphalt are used at CCL in both a crushed and uncrushed state. If crushed, concrete/asphalt may be used to build all-weather surfaces onsite, such as roads and tipping pads at the working face. Concrete/asphalt may also be used for landfill gas trench construction. If not crushed, concrete/asphalt may be used for erosion control and as energy dissipators, such as rip-rap and checkdams.

### **Processed C&D Material**

Processed C&D material is used at CCL similarly to concrete and asphalt. Processed C&D material may be used for construction of wet weather pads, road base, roads and ramps, and pipe crossings.

*TASW*

TASW is used at CCL as alternative daily cover (ADC), as it is an allowable use of this material, consistent with Title 27 CCR. Additional information about TASW and use of TASW at CCL can be found in Topical Response #26, Treated Auto Shredder Waste.

*Shredded Tires*

Shredded tires are used at CCL to protect the methane gas pipeline system as trench backfill in construction of the landfill gas system.

*Shredded Green Waste*

Shredded green waste is used at CCL for temporary slope stabilization, erosion control, fugitive dust control, and ADC.

*MRF/C&D Fines*

MRF and C&D fines are used at CCL as an operations layer over the landfill liner during construction, for protection of the methane gas pipeline system as trench backfill, and for well raising, bench transitions, and pipe crossings. MRF and C&D fines may also be used as ADC.

### Operational Effects of Beneficial Reuse

There are significant environmental benefits, in addition to operational and safety benefits, that result from reusing these otherwise waste materials beneficially onsite.

The beneficial aspects of using these materials include, but are not limited to, the following:

- Dust control – compliance with South Coast Air Quality Management District (SCAQMD) Rule 403
- Dust control – compliance with Title 14 CCR, Sections 17407.4, Dust Control
- Preventing track-out of mud onto State Route 126 – being a good neighbor, dust control, compliance with Rule 403 and Title 14
- Water conservation – water use for dust control minimized
- Improved air quality – avoided emissions from onsite equipment use, such as water trucks
- Improved air quality – reduced landfill gas surface emission control, compliance with SCAQMD Rule 1150.1
- Erosion control – compliance with RWQCB Order R4-2011-052
- Nuisance control
- Safety – improved driving surfaces for customer access
- Safety – improved walking and driving surfaces for employees
- Odor control – compliance with SCAQMD Rule 402 and Title 14 CCR, Section 17406.2
- Litter control
- Landfill gas control – keeping system components operational thereby minimizing the risk of potential nuisances and Notices of Violation
- Sediment control – minimizing sediment entering the onsite storm water basins

### Compliance Benefits of Beneficial Use

Blue Ridge Services prepared a report for CCL on the compliance benefits of beneficial use material at landfills. Blue Ridge Services reviewed the tonnage of beneficial use materials used at Los Angeles County landfills, reviewed the history of compliance violations at Los Angeles County landfills, and correlated tons of beneficial use material to compliance violations. The Blue Ridge Services report is included in Appendix N, Beneficial Use.

The Blue Ridge Services report finds that, as outlined in Title 27 CCR, Section 20686 (Beneficial Reuse), there are twelve uses for waste materials. Eleven of these uses are related to a range of processes and activities at landfills – all of which are part of operating a compliant landfill. Blue Ridge Services considered whether these beneficial uses would “translate into an improved and more compliant operation.” To do so, they “looked for a correlation between the quantity of beneficial reuse used, and the number of relevant LEA incidents, including Areas of Concern (AOC) and Notice of Violation (NOV).” Blue Ridge Services considered relevant LEA incidents to be things that beneficial reuse would affect, such as daily cover, litter control, drainage and erosion, odor, etc.

Blue Ridge Services found that for all Los Angeles County landfills reviewed, as the number of beneficial use tons increases, the number of LEA incidents at that site decreases. Inversely, the fewer beneficial use tons used at a landfill, the more likely that site is to have a higher number of LEA incidents. As shown in the Blue Ridge Services report, CCL receives the most tons of beneficial reuse material per LEA incident of any landfill in Los Angeles County (conversely, CCL experiences the fewest LEA incidents per tons of beneficial reuse material).

The Blue Ridge Services report provides additional discussion of how beneficial use materials are appropriately used at CCL currently in support of the following:

- Erosion Control
- Landfill Gas Control
- Odors
- Wet Weather
- Dust Control
- Access Roads

Blue Ridge Services concludes that there is a direct correlation between the receipt and use of beneficial reuse materials in sufficient quantities and improved regulatory compliance.

FINAL

# Chiquita Canyon Landfill Master Plan Revision Final Environmental Impact Report Response to Comments on Draft EIR

Project No. R2004-00559-(5)  
SCH No. 2005081071

*Lead Agency:*

County of Los Angeles, Department of Regional Planning

*Project Proponent:*

Chiquita Canyon Landfill

February 2017



CH2M HILL, Inc.  
6 Hutton Centre Drive  
Suite 700  
Santa Ana, California 92707





Fernandeano Tataviam Band of Mission Indians  
**Tribal Historic & Cultural Preservation**

Larry J. Ortega Sr.  
*Tribal President*

#1

*Tribal Historic & Cultural  
Preservation Committee*  
Steve Ortega  
*Chairman*  
Berta Pleitez

July 14, 2014

Kim Szalay  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

**Subject: Update for Chiquita Landfill Project, Los Angeles County, CA**

Dear Kim Szalay,

The Fernandeano Tataviam Band of Mission Indians (Tataviam) would like to inform you that Tataviam have entered into an agreement with Chiquita Canyon, LLC (CCL) on the matter of the Chiquita Canyon Landfill Project (CCLP). Tataviam are providing CCL with construction monitoring and cultural resource oversight services for the CCLP.

We identified the potential for cultural resources within the CCLP proposed grading and excavation. Tataviam entered into negotiation with CCL for the proposed grading and excavation to be adjusted to exclude the Bower's Cave site. Tataviam were successful in having the grading and excavation plans moved in avoidance of Bower's cave, for the sake of the site's cultural relevance and preservation. We are doing our best to ensure that artifacts and features are avoided, but here is still a possibility that they will be encountered. Artifacts and features can go undetected and can also shift due to erosion and tectonic activity. Therefore, Tataviam are providing construction and cultural resource oversight and monitoring to CCL for the CCLP.

1-1

Furthermore, all artifacts that may be found will be returned to Tataviam or reinterred into the earth. CCL understands that Bower's Cave cultural, historical, and archaeological site is to remain untouched and avoided by both personnel and impacts of the project. If any other artifacts or features of cultural, historical, or archaeological nature are found, the tribe is to be notified immediately.

Sincerely,

Caitlin B. Gulley  
Tribal Historic and Cultural Preservation  
cgulley@tataviam-nsn.us

RECEIVED  
JUL 17 2014  
BY: \_\_\_\_\_

**Native American Contacts  
Los Angeles County  
July 17, 2014**

Beverly Salazar Folkes  
1931 Shadybrook Drive  
Thousand Oaks CA 91362  
folkes9@msn.com  
(805) 492-7255  
(805) 558-1154 Cell

Chumash  
Tataviam  
Fernandeño

Fernandeno Tataviam Band of Mission Indians  
Larry Ortega, Chairperson  
1019 - 2nd Street, Suite #1  
San Fernando CA 91340  
(818) 837-0794 Office  
(818) 837-0796 Fax

Fernandeno  
Tataviam

San Fernando Band of Mission Indians  
John Valenzuela, Chairperson  
P.O. Box 221838  
Newhall , CA 91322  
tsen2u@hotmail.com  
(661) 753-9833 Office  
(760) 885-0955 Cell  
(760) 949-1604 Fax

Fernandeño  
Tataviam  
Serrano  
Vanyume  
Kitanemuk

Randy Guzman - Folkes  
4676 Walnut Avenue  
Simi Valley , CA 93063  
ndnRandy@yahoo.com  
(805) 905-1675 Cell  
(805) 520-5915 Fax

Chumash  
Fernandeño  
Tataviam  
Shoshone Paiute  
Yaqui

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed Chiquita Canyon Landfill Master Plan Revision Project; located near the City of Castaic; Los Angeles County, California for which a Sacred Lands file search and Native American Contacts list were requested.

# Letter No. 1

Caitlin B. Gulley  
Tribal Historic and Cultural Preservation  
Fernandeño Tataviam Band of Mission Indians  
1019 Second Street, Suite 1  
San Fernando, CA 91340

## Response to Comment No. 1-1

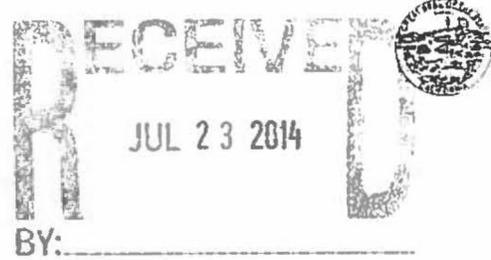
Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

Coordination with Tataviam is detailed in Mitigation Measure CR-3. The letter correctly notes that Bowers Cave will be avoided and that any artifacts found will be returned to Tataviam or reinterred into the earth. The Fernandeno Tataviam Band will be notified if any additional artifacts are discovered.



**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Boulevard, Suite 100  
West Sacramento, CA 95691  
(916) 373-3715  
Fax (916) 373-5471  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
Ds\_nahc@pacbell.net  
e-mail: ds\_nahc@pacbell.net



July 17, 2014

Ms. Iris Chi, City Planner  
**Los Angeles County Department of Regional Planning**  
320 West Temple Street  
Los Angeles, CA 90012

RE: SCH# 2005081071 CEQA Notice of Completion and Environmental Document Transmittal for the **“Chiquita Canyon Landfill Master Plan Revision”** project located near the City of Castaic; Los Angeles County, California

Dear Ms. Chi:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

- |  |     |
|--|-----|
| Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas   | 2-1 |
| of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).   | 2-2 |
| We suggest that this (additional archaeological activity) be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. Any information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure pursuant | 2-3 |

to California Government Code Section 6254.10.	2-3 (cont.)
A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources.	2-4
California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People... with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." (The California Code is consistent with the Federal Executive Order 12898 regarding 'environmental justice.' Also, applicable to state agencies is Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.	2-5
Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation and monitoring plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.	2-6
Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.	2-7

Sincerely,

  
 Gayle Totton  
 Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

## Letter No. 2

Gayle Totton  
Program Analyst  
Native American Heritage Commission  
1550 Harbor Boulevard, Suite 100  
West Sacramento, CA 95691

### Response to Comment No. 2-1

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

The identification and evaluation of archaeological resources during the life of the Project are addressed in Mitigation Measures CR-1 through CR-3 of the Final EIR Chapter 9, Cultural and Paleontological Resources. Mitigation Measure CR-2 describes development of a Cultural Resources Monitoring Plan (CRMP) that will address identification and evaluation of archaeological resources.

### Response to Comment No. 2-2

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

Monitoring of ground-disturbing activities in areas of archaeological sensitivity by a certified archaeologist and culturally-affiliated Native American is addressed in Mitigation Measures CR-1 through CR-3 of the Final EIR Chapter 9, Cultural and Paleontological Resources.

### Response to Comment No. 2-3

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

### Response to Comment No. 2-4

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

### Response to Comment No. 2-5

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

### Response to Comment No. 2-6

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

Mitigation Measures CR-1 through CR-3 of the Final EIR Chapter 9, Cultural and Paleontological Resources, describe a CRMP that will include provisions for discovery of Native American human remains.



#3

To: Los Angeles county regional planning department

7/28/14

Iris chi, Luke money, Vanessa bookman

We are the residents of Val Verde park the community on Lincoln avenue address 28838, 28848, 28874,...by Chiquita canyon road, we are the second generation who move in to Val Verde since thirty years ago and put new houses, we firmly refuse for any expansion to Chiquita canyon land fill for whatever reasons or to any renew timing terms extension or contract project without acceptance or opinion from the local community. Since 1972 the Chiquita canyon landfill exist, and after forty years development, plus adding a thousand houses in Santa Clarita valley, and double population ,the officials at Chiquita canyon your master plan revision doubling the amount of the trash and the space, and the life of the landfill, and you want to continue with the same business , instead you should close this trash landfill, and you look around ,also we reject any community benefit funds for help .there is choice between developing, Val Verde park, Castaic city, and hasley hills residential communities throughout the future, or destroy these large communities backward, we decide the health, safety, environment, and property values of our life and interest . Please do not try to in force, the neighborhoods communities on decision not to their interests or desired by other party or lead agency .there are another site or places somewhere for land fill. We do not agree on expansion or extension to Chiquita canyon land fill and we will fight this plan with whatever means and thank you to your coordination.

3-1

Sincerely

Dabbagh family, Akram, April, Andrew, Jordan,

phone, 661,257-8645

*Akram Dabbagh*

*7 / 29 / 14*

## Letter No. 3

Akram Dabbagh  
Val Verde, CA

Response to Comment No. 3-1

Comment noted.



GAIL FARBER, CHAIR  
MARGARET CLARK,  
VICE-CHAIR

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331  
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460  
[www.lacountyiswmf.org](http://www.lacountyiswmf.org)

#4

July 28, 2014

Mr. Richard J. Bruckner, Director  
County of Los Angeles Department of  
Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

Mr. Bruckner:

**DRAFT ENVIRONMENTAL IMPACT REPORT  
CHIQUITA CANYON LANDFILL  
MASTER PLAN REVISION PROJECT NO.: R2004-00559-(5)  
REQUEST TO EXTEND PUBLIC REVIEW PERIOD**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) hereby requests an extension of the public review period by 45 days, until October 8, 2014, in order to provide adequate time to review and comment on the Draft Environmental Impact Report (DEIR) for the Proposed Chiquita Canyon Landfill Master Plan Revision Project No.: R2004-00559-(5).

On July 10, 2014, the Los Angeles County Department of Regional Planning (DRP) as the "Lead Agency," filed a "Notice of Completion and Availability" of a Draft Environmental Impact Report (DEIR) for the Project for a 45-day public review/comments process. The proposed Project, among other things, entails increasing the permitted daily disposal from 6,000 to 12,000 tons per day; increasing the disposal footprint laterally by 143 acres; and increasing the maximum elevation by 143 feet. Commensurate with the magnitude of the proposed Project, the DEIR contains over 2,000 pages of detailed and technical information.

To provide the opportunity for conducting a thorough review and developing comments on the subject DEIR, the Task Force at its last publically held meeting, voted to formally request that the DRP consider extending the public review period by 45 days, until October 8, 2014.

4-1

Mr. Richard J. Bruckner  
July 28, 2014  
Page 2

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989, as amended (AB 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents, including, but not limited to, the Countywide Siting Element and the Countywide Integrated Waste Management Plan, prepared for the County of Los Angeles and the 88 cities in Los Angeles County. The Task Force is also responsible for ensuring a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County and addressing the issues impacting the system on a Countywide basis. Membership of the Task Force includes representatives of the League of California Cities-Los Angeles County Division, the County of Los Angeles Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

4-1  
cont'd

If you have any questions, please contact Mr. Mike Mohajer of the Task Force at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or (909) 592-1147

Sincerely,



Margaret Clark, Vice Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Mayor Pro Tem, City of Rosemead

KM:fm

P:\EA\EA\TF\TF\Letters\2014\TFExtLtr4CCL\_MPR

cc: Each Member of the County of Los Angeles Board of Supervisors  
Each Member of the County of Los Angeles Regional Planning Commission  
County of Los Angeles Department of Regional Planning (Ms. Iris Chi, AICP)  
Waste Connections, Inc. (Mike Dean, District Manager)  
Each Member of the Los Angeles County Integrated Waste Management Task Force  
Each Member of the Facility & Planning Review Subcommittee

## Letter No. 4

Margaret Clark, Vice Chair  
Los Angeles County Solid Waste Management Committee  
Integrated Waste Management Task Force  
900 South Fremont Avenue  
Alhambra, CA 91803-1331

### Response to Comment No. 4-1

The public comment period was extended by 30 days, ending on September 23, 2014. The public comment period was subsequently extended by an additional 30 days, with a final end date of October 23, 2014.



**From:** Robert Glaser  
**Sent:** Wednesday, July 30, 2014 3:31 PM  
**To:** 'carderfam@yahoo.com'  
**Cc:** Iris Chi  
**Subject:** FW: Chiquita landfill NOP comments  
**Attachments:** Landfill NOP comments 12-12.docx

Hi Lloyd,  
I have been reassigned at our Department, Iris Chi is working on this project now and I am forwarding your comments to her.  
Thanks,  
Robert

**From:** Lloyd & Nancy Carder [mailto:carderfam@yahoo.com]  
**Sent:** Wednesday, July 30, 2014 3:24 PM  
**To:** Robert Glaser; Paul Mc Carthy  
**Subject:** Chiquita landfill NOP comments

I noted in the EIR that my comments were accredited to the then CATC president Scott Wardle. This is a problem because the CATC has not acted in any professional manner since this process has started. The only reason I was notified is my wife Nancy had submitted comments also and we found my 7 page comments credited to Scott when he was only CCed. I had on the original document a cover page with my information on it that was not included.

5-1

I will also bring this correction to the meeting Thursday.

Thank you both for your efforts here lots of impacts for years to come if approved.

Best Regards,

Lloyd E. Carder II  
Castaic reg. 3

# Letter No. 5

Lloyd Carder  
Castaic, CA

## Response to Comment No. 5-1

Comment noted.

Rec'd 7/31/14

R 2004-00559-5

1 Chi / R. Ruiz

July 31, 2014

Ms. Iris Chi  
Los Angeles County Department of Regional Planning  
Zoning Permits North Section, Room 1348  
320 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Chi:

**DRAFT ENVIRONMENTAL IMPACT REPORT  
CHIQUITA CANYON LANDFILL MASTER PLAN REVISION  
COUNTY PROJECT NO. R2004-00559-(5)---CONDITIONAL USE PERMIT NO. 200400042  
STATE CLEARINGHOUSE NUMBER 2005081071**

As a private citizen and a resident of the County of Los Angeles, I want to thank the Los Angeles County Department of Regional Planning (DRP) for the opportunity to review and offer the following comments on the subject Project's Draft Environmental Impact Report (DEIR).

The Project is proposed by Waste Connections, Inc. (Applicant) which, among other things, provides for continued operation of the existing landfill by increasing the current permitted daily disposal from 6,000 to 12,000 tons of solid waste per day; increasing the disposal footprint laterally by an 143 acres; and increasing the landfill maximum elevation by additional 143 feet. This would increase the landfill capacity by an additional 90 million tons (approximately) and extend the landfill life by additional 21 to 38 years, depending on the actual daily disposal rate. The proposed Project also entails setting-aside of land for potential future "conversion technology", development of a household hazardous waste facility, and an open mixed organics waste aerobic composting operation.

The Project's DEIR was released by the DRP for a 45-day public review period on July 10, 2014. Considering the Project type (landfill and open mixed organic waste composting operation), its DEIR, and the proposals to develop over 7,250 single and multi-family residential units surrounding the landfill (some are proposed to be located as close as 500 feet to the edge of the trash filled areas), I find the 45-day review period extremely inadequate for citizens to review the document completely and in detail, and offer timely comments. In general, draft environmental documents for projects such as a landfill or a similar waste management facility are provided with a minimum of 90 days for review by communities and other stakeholders, and the same should be applicable to the case on hand.

6-1

Based on the foregoing, I have reviewed the Project's DEIR which, among other things, states that the proposed Project will have a significant and unavoidable negative impact on (a) the region's air quality where the concentrations of particulate matter exceed federal limits established to protect public health and safety, and (b) traffic/transportation (emphasis added). Considering the short deadline established by the DRP for the review period, the following comments are offered with the understanding that I may provide additional comments prior to the "deadline" expiration date.

### Section 1.3 - Project Need

This Section attempts to justify the Project's major goal which is to expand the existing landfill by an additional 90 million tons of capacity on the basis that there will be an in-County disposal capacity shortfall of approximately five million tons by the year 2026 and thus the need for the Project. However, the DEIR does not discuss as to whether the use of the landfill will be limited only to solid waste generated by the 89 jurisdictions in Los Angeles County OR the use is open to all entities in- and out-of Los Angeles County. Considering the Project need's justification, this is an important issue that must be addressed.

6-2

Further, the analysis to justify the need for the Project is outdated due to the requirements of (a) Senate Bill 1016 (Chapter 343 of the State Statutes of 2008), (b) Assembly Bill 341's (Chapter 476 of the 2011 State Statutes) implementing regulations/policies, and (c) the AB 32 (the California Global Warming Solutions Act of 2006) First Update to the Climate Change Scoping Plan, dated May 2014 (Scoping Plan Update) and approved by the California Air Resources Board (ARB) on May 22, 2014. One of the Scoping Plan Update's adopted goals is to phase out the land disposal of organic waste starting in 2016. Specifically, Chapter IV, Section 5 of the Scoping Plan Update states the ***"ARB and CalRecycle will lead the development of program(s) to eliminate disposal of organic materials at landfills. Options to be evaluated will include: legislation, direct regulation, and inclusion of landfills in the Cap-and-Trade Program. If legislation requiring businesses that generate organic waste to arrange for recycling services is not enacted in 2014, then ARB, in concert with CalRecycle, will initiate regulatory action(s) to prohibit/phase out landfilling of organic materials with the goal of requiring initial compliance actions in 2016 (emphasis added)."***

As a follow up to the AB 32 Scoping Plan Update, there are two bills currently under consideration by the State Legislature, namely AB 1826 which requires implementation of mandatory commercial organic waste recycling programs by jurisdictions by 2016, and AB 1594 which essentially prohibits the disposal of green materials by a jurisdiction that cannot meet the State diversion mandates. Both bills have been approved by the State Assembly and the Senate Environmental Quality Committee and are scheduled to be considered by the Senate Appropriations Committee upon their return from the summer recess. The following are links to AB 1826 and AB 1594, respectively. (Note: It is my understanding that both bills are being supported by ARB and CalRecycle as well as the Governor.)

6-3

[http://www.leginfo.ca.gov/pub/13-14/bill/asm/ab\\_1801-1850/ab\\_1826\\_bill\\_20140701\\_amended\\_sen\\_v95.pdf](http://www.leginfo.ca.gov/pub/13-14/bill/asm/ab_1801-1850/ab_1826_bill_20140701_amended_sen_v95.pdf)

[http://www.leginfo.ca.gov/pub/13-14/bill/asm/ab\\_1551-1600/ab\\_1594\\_bill\\_20140701\\_amended\\_sen\\_v94.pdf](http://www.leginfo.ca.gov/pub/13-14/bill/asm/ab_1551-1600/ab_1594_bill_20140701_amended_sen_v94.pdf)

As stated in the AB 32 Scoping Plan Update, California still disposes about 30 million tons of solid waste in landfills each year. Additionally, based on recent waste characterization studies conducted by CalRecycle, approximately 75% of the 30 million tons of solid waste disposed in landfills are organics. As such, the phasing out of land disposal of organics would essentially reduce our need for landfill capacity by 75 percent assuming the needed infrastructures are in place and markets are available for the end product.

Based on the foregoing, the analysis provided in this Section and other related sections of the DEIR need to be completely updated and revised as appropriate. In addition to discussion listed in the Section 2.2.12, the updated analysis must also provide a full/expanded discussion of

6-4

aerobic and anaerobic composting, and in-vessel anaerobic digestion (AD) processes and development of these facilities in conjunction with the phased-in expansion of the existing Chiquita Canyon Landfill. For example, the County may want to consider approval of the proposed Master Plan but limiting the landfill expansion in phases each limited to an eight-year life with a maximum disposal capacity of 18 million tons, and providing that the approval of the first phase would be contingent upon the Applicant to develop an on-site AD facility with a negotiated capacity of approximately 1,000 tons per day to be constructed during the initial five years of Phase I of the landfill expansion. If the applicant fails to develop the AD facility during the initial five years after issuance of the Conditional Use Permit (CUP), then the CUP's allowable disposal rate would be reduced by 1,500 tons per day for each year that Applicant fails to meet the said requirement. If the said AD facility is not in operation by the end of Phase I, then the Applicant would not be eligible to apply for the Phase II of the landfill expansion. However, if the AD facility is operational at the conclusion of the Phase I, the County may consider approval of the Phase II of the landfill expansion contingent on the development of a conversion technology facility with a capacity of 500 tons per day or another AD facility, again during the first five years of the Phase II of the landfill operation. Upon successful operation of the Phase II and prior to the County's consideration of the Phase III's approval of the landfill expansion, the Applicant, in consultation with the County and the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (see comments provided under Section 1.4.2), is to evaluate the Project's disposal need vs the on-site adequacy of AD and conversion technology available capacity. Subject to the results of the said study, the approval of the Phase III of Project may proceed, potentially contingent on the on-site development of additional AD and/or conversion technology capacities. The suggested process for the Phase III's approval may also be used to consider the remaining phases of the Project.

6-4  
cont'd

The CUP methodology being suggested above is very similar to the one that was used by the County Regional Planning Commission to issue the Puente Hills Landfill CUP which is located in the Community of Hacienda Heights.

As previously indicated the proposed Project also encompasses an open mixed organic waste aerobic composting operation. While I am in support of aerobic composting operations, I am opposed to such an operation in an open air environment due to the Project's "significant and unavoidable" negative impact on the region's air quality, as well as proximity of the Project to the proposed residential developments, and the site location in re to the atmospheric air movement. Such an operation should be supported if it is conducted in an enclosed area operating under negative pressure, and air discharges are treated according to all existing rules and regulations prior to any release to the atmosphere.

6-5

#### **Section 1.4.2 – Public Scoping Process**

Consistent with the requirements of Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989, as amended (AB 939), the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) is responsible for coordinating the development of all major solid waste planning documents, including, but not limited to, the Countywide Siting Element and the Countywide Integrated Waste Management Plan, prepared for the County of Los Angeles and the 88 cities

6-6

in Los Angeles County. The Task Force is also responsible for ensuring a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County and addressing the issues impacting the system on the Countywide basis. Membership of the Task Force includes representatives of the League of California Cities-Los Angeles County Division, the County of Los Angeles Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

6-6  
cont'd

The existing Chiquita Canyon Landfill is currently operating pursuant to the "Finding of Conformance" that has been issued by the Task Force. Unfortunately the entities listed in this Section do not include the Task Force. This issue needs to be addressed in the final EIR.

**Section 1.4.3 – Agencies and Interested Parties Consulted**

Please see comments under Section 1.4.2, above

**Section 1.5 – Project Approvals**

Please expand to indicate that the proposed Project must obtain a Finding of Conformance from the Task Force to ensure consistency with the Los Angeles County Countywide Siting Element and its siting criteria, including, but not limited to odor control and provisions for the required buffer zone from the proposed residential developments, schools and immobile population.

6-7

**Sections 4.5 – Local Setting, 4.6 – Potential Impacts, 4.7 – Mitigating measures, and 4.8 - Significant After Mitigation**

As previously indicated the proposed Project is scheduled to be surrounded by over 7,200 single and multi-family residential homes, some as close as 500 ft from the edge of the trash filled areas. It is a known fact that landfill gas, if not controlled, moves laterally underground to neighboring structures potentially exposing these structures and their occupants to explosion and other fire hazards. Additionally, landfill gas contains other gases that are carcinogenic, and public exposure to them must be avoided to the maximum extent possible. In addition, populations adjacent to landfills are generally exposed to odor which is considered to be a nuisance and, if not mitigated, an human health hazard pursuant to Title 11 of the Los Angeles County Code, Section 11.02.300 (E). As such, a buffer zone of at least 2,000 feet between the landfill trash filled areas and the neighboring communities is an essential mitigating tool when it is used in concert with additional mitigation measures. The DEIR must be expanded to thoroughly address these issues and identify potential mitigating measures in order to avoid subsurface landfill gas migration as well as preventing occurrence of odor problems such as those experienced by the Sunshine Canyon Landfill neighboring communities.

6-8

**Chapter 11 – Air Quality, Impact AQ-10, and Section 11.9.2.4 - Odor Impacts**

- The analysis must be reviewed and revised/updated to ensure consistency with the ARB May 2014 Scoping Plan Update and proposed legislations offered by AB 1826 and AB 1594 which are projected to be enacted by early October 2014.

6-9

- The analysis must be expanded to incorporate impacts of the existing/proposed open mixed organic waste aerobic composting operation and provide needed mitigating measures. The overall conclusion that the "impacts have been mitigated to the extent feasible through the implementation of Project Design Measures" cannot be justified since the Project's actual "design" details are not provided nor have their adequacies been verified/substantiated.

6-10

- Cumulative Odor Impacts – The DEIR states that the Project "employs a comprehensive approach to controlling odors by employing numerous odor control measures." However, discussion of the control measures is sketchy and mostly consists of common practices. However, considering the location of the Project which duplicates the Sunshine Canyon Landfill location, increasing the landfill height by an additional 143 feet, the development of over 7,200 residential units within a close proximity (500 feet) of the Project site, and the landfill and open mixed organic waste aerobic composting operation as the potential source of odor, the proposed mitigating measures are elementary in nature and essentially inadequate. It is strongly recommended that as a part of the final EIR preparation, the Applicant and its consultant(s) evaluate the Sunshine Canyon Landfill situation and develop the Project's site specific "comprehensive" odor mitigating measures.

6-11

**Chapter 12 – Greenhouse Gas Emission and Climate Change**

In light of the comments provided under Section 1.3, above, the discussion and analysis provided in the Chapter 12 need to be reviewed and revised/updated to ensure consistency with the ARB's May 2014 Scoping Plan Update.

6-12

Thank you for your consideration of the above comments. Should you have any questions, you can reach me at P.O. Box 3334, San Dimas, CA 91773-7334.

Sincerely,



M. MICHAEL MOHAJER

EC: Rob Glaser, Los Angeles County Department of Regional Planning

# Letter No. 6

Michael Mohajer  
P.O. Box 3334  
San Dimas, CA 91773-7334

## Response to Comment No. 6-1

The public comment period was extended by 30 days, ending on September 23, 2014. The public comment period was subsequently extended by an additional 30 days, with a final end date of October 23, 2014.

## Response to Comment No. 6-2

Please see Topical Response #24, Source of Waste/Importation of Out-of-County Waste.

## Response to Comment No. 6-3

Please see Topical Response #19 for a discussion of Project Need.

## Response to Comment No. 6-4

Please see Topical Response #3, Composting Facility and Conversion Technology.

## Response to Comment No. 6-5

Please refer to Chapter 11, Air Quality, of the Final EIR for evaluation of the mixed organics processing/composting facility. Please also see Topical Response #3, Composting Facility and Conversion Technology.

## Response to Comment No. 6-6

Section 1.9 of the Introduction chapter of the Final EIR was revised to address this comment.

## Response to Comment No. 6-7

Section 1.9 of the Introduction chapter of the Final EIR was revised to address this comment.

## Response to Comment No. 6-8

Please see Topical Response #15, Land Use, Topical Response #17, Odor, and Topical Response #21, Public Health.

## Response to Comment No. 6-9

Please see the revised Chapter 11, Air Quality, of the Final EIR, which was also included in the Partially Recirculated Draft EIR, for updates that reflect Assembly Bill 1826 and Assembly Bill 1594.

## Response to Comment No. 6-10

Please see Topical Response #3, Composting Facility and Conversion Technology.

## Response to Comment No. 6-11

Please see Topical Response #17, Odor.

## Response to Comment No. 6-12

Chapter 12, Greenhouse Gas Emissions and Climate Change, was updated to reflect California Air Resources Board's May 2014 Scoping Plan Update, and included in the November 2016 Partially Recirculated Draft EIR.



To: Rob Glaser, Principal Planner  
Zoning Permits North Section  
Los Angeles Co Dept. of Regional Planning  
320 W Temple St, room 1348  
Los Angeles CA 90012

CC: (2) Michael Antonovich  
LA County Supervisor 5<sup>th</sup> District  
500 West Temple Street, Room 869  
Los Angeles, CA 90012

Scott Wardle (president)  
Castaic Area Town Council  
Castaic, CA 91384

From: Lloyd E. Carder II  
[carderfam@yahoo.com](mailto:carderfam@yahoo.com)  
C 661-600-2134

REGIONAL PLANNING COMMISSION

RECEIVED  
JUL 8 1 2014

R2004-00559-5  
L. Chi / R. Ruiz

Location 29201 Henry Mayo Drive (Highway 126) Castaic CA 91384 Located between Regions 1 and 2 of the Castaic Area Town Council.

As a past member of the Castaic Town Council, I am aware that the council has abrogated it duties to comment and guide the EIR process for the proposed landfill expansion. The Council by-laws prevent swift action without warning, due to the fact that actions must be presented to the public as an agenda item prior to official actions by the Council can be taken. This process takes two months minimum to process, so longer notice is required by the Council. During my term on the council, many times we were required to comment at the earliest steps for such a large project with such serious ramifications to the community. First notifications were received, and extensions for comment periods were requested to conform to council bylaws.

Due to the councils unavoidable delayed response past the comment extension date, I would hope that Supervisor Antonovich's Staff and the LA County Regional Planning will receive these comments for action and expand the notification process to the other affected areas outlined below to prevent future problems.

1. Val Verde, and North river "Project" (Region 2 of the Castaic Town Council)
2. Hasley Canyon Area (Region 3 of the Castaic Town Council)
3. Live Oak Community, River Village "Project", and the Castaic Valencia Industrial Park (Region 1 of the Castaic Town Council)

*Notification of Expansion was sent only to the Val Verde area residents all other communities directly affected were NOT included and must be added for all future notices.*

Areas to be included should include the above listed and any other areas that fall within a 50% increased sphere of impact notification. Using the 1997 documented sphere of impact of 1.2 miles, and projecting a 50% increase the new proposed impacted areas would fall within a 1.8 mile radius of the landfill boundaries'.

- While all of the Castaic community should have input into the Chiquita Landfill Expansion the residents of the three (3) regions of the Castaic Area Town Council should be notified of all meetings and deadlines for comments by post. Public meetings for these regions should be held at the Live Oak School Site auditorium or Castaic Middle School to allow best attendance.

The request for the permit extension should allow all rules and laws to be applied and implemented immediately. The implementation of AB939 recycling requirements should go into effect 2012 and all municipalities utilizing this facility be required to follow these requirements.

7-1

7-2

After reviewing the Initial Study Checklist, there were some items of question and items not on the list that must be added or will be questioned during the EIR.

1. **Aesthetics: states less than significant impact**

- a. The 126 Hwy is a first Priority Scenic Highway and the proposed landfill height and visibility would make this road way forfeit the scenic designation having a "**Potentially Significant Impact**".
- b. The Castaic Community Standards District (CSD) is not listed as a requirement.
- c. The SCV SEA (vistas section is not listed as a requirement.
- d. Property Value impacts

**Vistas and CSD considerations:**

The Castaic Community Standards District (CSD) is not listed as a regulation to be followed along with the SCV SEA vista regulations. The Castaic CSDs ridgeline protection sections clearly outline how scenic vistas must be protected and maintained. The proposed 140/ft increase in the approved height would be making the landfill the tallest figure in the hillside range violating the approved CSD. All height projections must be shown utilizing photos from all visually affected roadways, community ingress and egress pathways and the neighborhoods of Live Oak, the Valencia Industrial Park, Mission Village, North River and Val Verde.

**Other Scenic jurisdictions along the 126 corridor must be considered. County comment on scenic routes and roadways must be reviewed along with CSD considerations. As the picture below shows the present Landfill is becoming a significant visual impact already, adding 140ft would make it the largest hill within the hillside range. Impact Significant.**

7-3



**Picture from 126 ½ mile west from I5**

Ascetic impacts shall contain affects to areas of ingress and egress such as entrance roads to Hasley Canyon, Val Verde, Live Oak, and Castaic Industrial Park Also to include impact on Landmark Village, Mission Village and Homestead Village.

**(3) Air Quality**

- a. Exposure to Sensitive Receptors do not list impacts to:
- i. Schools
  - ii. Planned schools
  - iii. AQMD-CARB

7-4

After reviewing the Initial Study Checklist, there were some items of question and items not on the list that must be added or will be questioned during the EIR. There are a significant many established and plan/approved residential, business and school areas not listed.

**Areas not list that are within the affected boundaries are as follows:**

- Val Verde, and North river "Project" (Region 2 of the Castaic Town Council)
- Hasley Canyon Area (Region 3 of the Castaic Town Council)
- Live Oak Community, Mission Village "Project", and the Castaic Valencia Industrial Park (Region 1 of the Castaic Town Council)

The Initial study List does not recognized areas that are approved by the Castaic Town Council and are in process and with approved maps submitted to Regional Planning. Areas to be included should include the above listed and any other areas that fall within a 50% increased sphere of impact notification. Using the 1997 documented sphere of impact of 1.2 miles, and projecting a 50% increase the new proposed impacted areas would fall within a 1.8 mile radius of the landfill boundaries'.

7-5

**Projects in Process:**

Landmark Village eventually will be home to about 4,500 residents along the Santa Clara River between the 126 just south, of the 2012 landfill entrance. The 300-acre neighborhood will also have an elementary school, community park and business development within the 1.2 mile affected zone.

Mission Village, located West of Magic Mountain and South of Hwy 126 was approved by the Los Angeles County Regional Planning Commission in May 2011. Mission Village is a 1261-acre neighborhood of 621 lots that include single family homes, condominiums, community park, and business development within the 1 mile affected zone.

Homestead Village is in process of approval and includes both a middle school and High school. The middle school will be within one (1) mile of boundary the High school 1.2-1.8.

**Air Quality:**

While other areas of Sothern California have reduced the number of first stage smog alerts, the Santa Clarita Valley has seen an increase in the number of first stage days. An emissions reduction plan must be presented to AQMD and CARB outlining emission reduction for garbage trucks entering the facility, on site vehicles such as tractors, haulers and landfill gases.

With the new stated CARB regulations all landfill operations should follow the set guide lines put forth by CARB. CARB must be added to the approving of the air quality plan showing the use of CNG, battery electric, hydrogen fuel cell and plug-in hybrid vehicles, by 2018.

7-6

A study of all hauling and grading aspects must include particulate, CO2 emissions, carbon monoxide, Vinyl Chloride, Methane, and all other regulated emissions associated with landfill, and grading type of operations.

7-7

**Sensitive Receptors:**

Air Quality Impact to schools within one mile of the landfill are of significant Impact. There are two approved projects that have school components within the 1 mile stated boundary. These schools will be operated by the Castaic School District. The district must be added to the list of notifications and approving bodies.

7-8

Landmark Village eventually will be home to an elementary school, Community Park within the 1.2 mile affected zone.

Homestead Village is in process of approval and includes both a middle school and High school. The middle school will be within one (1) mile of boundary the High school 1.2-1.8.

**These sites would be considered Air Quality Sensitive Receptors. Comments from both Castaic School district and the Hart School district will be required.**

7-8  
cont'd

## 2. (4) Biological Resources

- a. Wildlife impacts are not listed as a requirement.
- b. Applicable ordinances not listed
  - iv. Castaic CSD
  - v. SCV SEA

### **Wildlife Impacts:**

We need to assess that all sensitive species are adequately surveyed during the preparation of EIR outlined below but not limited to this list that specifically applies to the taxa that would be scavenge or hunt along the landfill cover, cap and boundaries where contaminated rodents would be hunted, become carrion or wander off site. Birds most affected by contaminated or poisoned food sources would be the raptors and nocturnal species that hunt wild game. The actual status of each, including nesting sites as applicable, impact analysis, must be addressed in an amended EIR.

Specifically, these species include:

1. California Condor (overlooked)
2. Golden Eagle (nesting raptor)
3. Cooper's Hawk (nesting raptor)
4. White-tailed Kite (nesting raptor)
5. Prairie Falcon (nesting raptor)
6. Horned Owl (nocturnal)
7. Long-eared Owl (nocturnal)
8. California Spotted Owl (Nocturnal)

7-9

## 3. (5) Cultural Resources

- a. Bowers Cave.
- b. Archaeological findings

### **Archaeological and Historical Impacts and Protection**

Expected impacts and protection plans must be outlined for the **Bowers Cave**, Tataviam Indian sites and petroglyphs located on or near the landfill site area. Also plans for escorting guests to view and study the sites must be proposed. Due to the fact that the last Tataviam of this tribe died in early 1900s the closest tribe with legal jurisdiction would be the Fernandeño Tataviam Band of Mission Indian's and the Chumash Tribe. The Chumash Tribal Council and Fernandeño Tataviam Band of Mission Indian's must be notified and approve any and all protection and impact proposals that would affect these sites located on or near the Landfill site.

About 50,000 years ago this area was an inlet with much of the landfill area under water. Many artifacts have been found in this area during grading. The EIR must show how any and all archaeological artifacts will be preserved and submitted to Los Angeles County for storage until a Castaic/SCV Museum is built to house them.

7-10

4. **(8) Greenhouse Emissions**

- a. Emissions
- b. Cap and Trade requirements

A study of all hauling and grading aspects must include particulate, CO2 emissions, carbon monoxide, Vinyl Chloride, Methane, and all other regulated emissions associated with landfill, and grading type of operations. This study must also include Vehicle operations including Haulers and site equipment, cogeneration units and water treatment operations.

7-11

The emission impacts will have some cap and trade impacts for emissions of haulers and landfill operations. We would like to see the numbers as projected b current CARB regulations.

5. **(10) Hydrology and Water Quality**

- a. Ground water
- b. Water treatment
- c. Monitoring

Presently the landfill operates without any leachate treatment facilities, runoff water treatment or ground water monitoring. Water contamination considerations must include continual monitoring of run off, area ground water monitoring wells, and river bed aquifer monitoring. The landfill location sits on the western region of the Saugus Aquifer that supplies water to all of the Santa Clarita Valley and is required for continued development of the Newhall Ranch development. The lower water table known as the Pico Aquifer is considered non-potable and will not be required in this assessment.

7-12

A new third party ground water survey and evaluation must be included and submitted to District 36 Water (LA County), Newhall Water District along with the Castaic Water Agency for comment. District 36 has a well within 1.2 miles that supplies water to Val Verde and Hasley Canyon. Both Hasley Canyon and Val Verde have private wells that will require some type of ground and surface water runoff monitoring.

7-13

*Implementation plans must be presented for leachate and surface water runoff monitoring of compounds listed by Federal and Calif. State landfill regulations, with the addition of **heavy metals** found in automotive manufacturing, **Lithium**, and **Mercury** from batteries, CFLs & electronic waste.*

Recognizing that the new CFL law will increase the number of mercury containing light bulbs being incorrectly disposed along with illegal disposal of cell phones, and other electronic devices, mercury must be added to the heavy metal list. One household product that is causing a problem these days is throwaway batteries. Each year, Americans throw away 84,000 tons of alkaline batteries. These AA, C and D cells that power electronic toys and games, portable audio equipment and a wide range of other gadgets comprise 20% of the household hazardous materials present around the country in America's landfills. With the new Lithium cells we must add the monitoring of these potential contaminants also.

7-14

A landfill cover or cap is an umbrella over the landfill to keep water out (to help prevent leachate formation). It will generally consists of several sloped layers: clay or membrane liner (to prevent rain from intruding), overlain by a very permeable layer of sandy or gravelly soil (to promote rain runoff), overlain by topsoil in which vegetation can root (to stabilize the underlying layers of the cover). If the cover (cap) is not maintained, rain will enter the landfill resulting in buildup of leachate to the point where the bathtub overflows its sides and wastes enter the environment

*The present use of Auto Shredder waste and compost outlined in the landfill proposal as daily cover is very permeable to rainwater, contain contamination elements of their own and will be factors in the discussion of the required water treatment facilities.*

7-15

**6. (14) Population and Housing**

- d. Areas of impact incomplete.
- e. Projects in approval process not listed
  - vi. Mission Village
  - vii.
  - viii. SCV SEA

After reviewing the Initial Study Checklist, there were some items of question and items not on the list that must be added or will be questioned during the EIR. There are a significant many established and plan/approved residential, business and school areas not listed or considered.

**Areas not list that are within the affected boundaries are as follows:**

- Val Verde, and North river "Project" (Region 2 of the Castaic Town Council)
- Hasley Canyon Area (Region 3 of the Castaic Town Council)
- Live Oak Community, Mission Village "Project", and the Castaic Valencia Industrial Park (Region 1 of the Castaic Town Council)

The Initial study list does not recognized areas that are approved by the Castaic Town Council and are in process with approved maps submitted to Regional Planning. Areas to be included should include the above listed and any other areas that fall within a 50% increased sphere of impact notification. Using the 1997 documented sphere of impact of 1.2 miles, and projecting a 50% increase the new proposed impacted areas would fall within a 1.8 mile radius of the landfill boundaries'.

7-16

**Property Values**

Proximity to landfills and hazardous waste sites can severely affect property values. Any property close to an active landfill will probably be devalued as a matter of course. Depending on how close the property lies to the site, whether the site is still active, and (if not active) if the waste has been properly encapsulated or removed, the value of a tract of land or home could be affected in many different ways. For example, if an active landfill is declared "closed" and proper measures are taken to ensure that there is no risk of contamination from the waste therein, the value of a nearby property may rise from the low value it had from being located near an active waste site.

I recommend that the L.A County assessor report on the property value effects on all properties within 1 mile-1.5 miles and 1.8 miles from the outer boundaries of the landfill site. The report should contain projected values if the extension is approved, along with the values if closed as presently contracted.

***Short term profits from the landfill operations must be weighed against the loss of continued property tax incomes from high end businesses and residential locations in the landfill area.***

Projects in Process such as Landmark Village will be home to about 4,500 residents along the Santa Clara River between the 126 just south, of the 2012 landfill entrance and within the 1.2 mile affected zone.

Mission Village, located West of Magic Mountain and South of Hwy 126 was approved by the Los Angeles County Regional Planning Commission in May 2011 within the 1 mile affected zone.

Homestead Village is in process of approval and includes both a middle school and High school. The middle school will be within one (1) mile of boundary the High school 1.2-1.8.

7-17

**7. (17) Transportation and Traffic**

- a. Truck traffic on 126
- b. Trash along road sides
- c. Hauler emissions.

7-18

Hauler traffic will be a significant traffic impact and will be very dependent on the amount of intake allowed per day. Presently at 6.00Am one complete lane is blocked by trucks waiting to get on site for about 1 mile.

**8. (19) Mandatory Findings of Significance**

- 1) Environmental Racism

Environmental discrimination has historically occurred with respect to several different kinds of sites, including waste disposal. The justification that has been used is to pay off the affected community as was done under the original 1997 contract. The money received by Val Verde never will resolve the health effects that those in the community have suffered. "Environmental justice advocates make the argument that minority populations often undertake environmentally hazardous activities because they have few economic alternatives and/or are not fully aware of the risks involved." The EIR should be reviewed by both Calif. EPA and the State Attorney General before the approval process moves forward in the county as an Environmental Justice issue. No community should be asked to trade health for money.

7-19

**Reviewing agencies and groups:**

**The following agencies must be added to the review list:**

1. Water District 36- LA Co. Water district 36
2. Newhall Water District
3. Castaic School District
4. Hart School District
5. Chumash Tribal Council
6. Fernandeño Tataviam Tribal Council
7. Calif. State Attorney General (environmental Justus considerations)
8. Los Angeles County Assessor's Office
9. Castaic Chamber of Commerce
10. CARB
11. SAQMD

7-20

Lloyd E. Carder II

30530 Remington Rd.

Castaic, CA 91384

Region 3 Resident

*President Castaic Area Town Council (2005-2006)*

*Treasurer Castaic Area Town Council (2002-2005)*

*Castaic Town Council Land Use 1995-2002*

# Letter No. 7

Lloyd E. Carder, II  
30530 Remington Rd.  
Castaic, CA 91384

## Response to Comment No. 7-1

Please see Topical Response #22, Public Scoping and Public Outreach.

## Response to Comment No. 7-2

Please see Topical Response #19 for a discussion of Project Need.

## Response to Comment No. 7-3

Please see Topical Response #27 for a discussion of Visual Resources and Topical Response #20 for a discussion of Property Values.

## Response to Comment No. 7-4

Existing locations of sensitive receptors, including schools and planned schools, are included in the air quality and health risk analyses for the Proposed Project and Cumulative Impacts, even if not specifically identified in the text of the Air Quality chapter. Please see Chapter 11, Air Quality, Section 11.9, of the Partially Recirculated Draft EIR.

## Response to Comment No. 7-5

Existing locations of sensitive receptors, including locations of planned schools, residences, and businesses, are included in the air quality and health risk analyses for the Proposed Project and Cumulative Impacts, even if not specifically identified in the text of the Air Quality chapter. Likewise, planned sensitive receptors are considered in the cumulative impact discussion of the Air Quality chapter. Please see Chapter 11, Air Quality, Section 11.9, of the Partially Recirculated Draft EIR.

## Response to Comment No. 7-6

The Proposed Project includes compliance with South Coast Air Quality Management District (SCAQMD) and California Air Resources Board (CARB) standards, as discussed throughout the Air Quality chapters of the Original Draft EIR and Partially Recirculated Draft EIR.

## Response to Comment No. 7-7

All aspects of the Proposed Project required for an evaluation of potential air quality impacts are included in the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, pursuant to the California Environmental Quality Act.

## Response to Comment No. 7-8

Please see Topical Response #22, Public Scoping and Public Outreach. The Notice of Availability of the Original Draft EIR was sent to both the Castaic Union School District and the Hart Union School District.

## Response to Comment No. 7-9

Coordination with California Department of Fish and Wildlife and United States Fish and Wildlife Service will be conducted and appropriate sensitive species surveys will be conducted accordingly.

## Response to Comment No. 7-10

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

## Response to Comment No. 7-11

All aspects of the Proposed Project required for an evaluation of potential air quality impacts are included in the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, pursuant to the California Environmental Quality Act.

## Response to Comment No. 7-12

Please see Topical Response #10, Environmental Monitoring, for a discussion of surface water and groundwater quality monitoring.

## Response to Comment No. 7-13

Please see Topical Response #30 for a discussion of Water Quality.

## Response to Comment No. 7-14

Please see Topical Response #10, Environmental Monitoring, for a discussion of surface water and groundwater quality monitoring.

## Response to Comment No. 7-15

Please see Topical Response #26 for a discussion of Treated Auto Shredder Waste and Shredded Tires.

## Response to Comment No. 7-16

Please see Topical Response #26 for a discussion of Treated Auto Shredder Waste and Shredded Tires.

## Response to Comment No. 7-17

Please see Topical Response #20 for a discussion of Property Values.

## Response to Comment No. 7-18

Please see Topical Response #25 for a discussion of Traffic.

## Response to Comment No. 7-19

Please see Topical Response #9, Environmental Justice, and Topical Response #21, Public Health.

## Response to Comment No. 7-20

Please see Topical Response #22, Public Scoping and Public Outreach. The Castaic School District, Hart School District, Fernandeno Tataviam Tribal Council, CARB, and SCAQMD have been notified and/or have commented on the project. The other agencies listed are not located within 1,000 feet of the project or do not have jurisdiction over the project. It is not standard to send a Draft EIR of this nature to the State Attorney General or the Los Angeles County Assessor's office.



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#8

**Lack of sufficient mitigation for catastrophic geological soils failure:** REGIONAL PLANNING COMMISSION

*[From the Geology and Hydrogeology Section of the DEIR]*

Much of the precipitation received at CCL does not infiltrate because of the steep terrain. Surface water tends to be directed to the south and east of the site due to the steep ridgelines at the site. The northeastern portion of the site, which includes the proposed East Canyon expansion area, drains to the east into Castaic Creek located approximately 3,000 feet from the site boundary. Castaic Creek is seasonally dry and flows to the south to the Santa Clara River."

*Past performance of the landfill's ability to withstand the harsh and sudden rainfall of its graded containment walls has been poor. The grading stabilization of the West boundary is a major concern, as it collapsed in 1992 and was described to the Los Angeles Times as, "by far the worst case of erosion (we) have ever seen," according to Rod Nelson, the head of the ground-water regulatory unit for the L.A. region of the California Water Quality Control Board. At the time of the landslide, the water flow eroded the cover of the landfill, where garbage spilled out of the landfill. Because of the Santa Clara River's close proximity to the landfill, there were concerns that the immediate run-off would flow into the river.*

8-1

*The proposed mitigation measures do not address the potential loss of life, property, environmental pollution, reduced access on Chiquito Canyon Rd, nor does it offer details on how the future grading cells will affect structural integrity of previously-graded adjacent areas.*

**Seismic-induced Failure:**

*[From the Geology and Engineer's Report (RTF&A) of the DEIR]*

Based on the geologic fault investigation, RTF&A concluded that no mappable, through-going, continuous active or potentially active faults underlie the site, and the site is not within an Alquist-Priolo Earthquake Fault Zone, as established by CGS. The closest active (and zoned) fault to the site is the San Gabriel fault, located approximately 3.3 miles to the east-northeast. In our opinion, there is little probability of surface rupture due to faulting occurring on-site during the design life of the project.

8-2

*The potential for damage of the geosynthetic liner during a seismic activity is great and is not clearly addressed in the DEIR. In fact, this scenario occurred 1994, during the Northridge earthquake. Technical observations of the seismic damage at the landfill include:*

*[Neven Matasovic, M.EERI, Edward Kavazanjian, Jr., M.EERI, and Robert L. Anderson]*

Damage at the Chiquita Canyon Landfill, located approximately 12.2 km from the zone of energy release and subjected to an estimated bedrock PHGA of 0.33 g, may be attributable to a variety of factors, including operational procedures at the landfill, the details of the design, and commonly used construction quality assurance procedures for geosynthetic liners.

*[Proceedings of the NEHRP Conferene and Workshop On Research of the Northridge Earthquake of January 17, 1994]*

Damage to the landfill's geosynthetic line system and LCRS is described as "significant."

"At the Chiquita Canyon landfill, significant damage occurred at this site as a result of the Northridge Earthquake. This damage includes limited downslope movement of the waste, cracks in the soil cover system, tears in the geosynthetic liner system, and a temporary shutdown of the gas removal system, due to a loss of external power. In Phase 1, Canyon C, longitudinal cracks were observed at the top of hte landfill along the interface between the landfill liner and the waste fill. The largest cracks were approximately 300 mm wide, with vertical offsets of 150 to 300 mm. A localized tear in the geomembrane was observed in one area of Canyon C. The tear, which occurred at the top of the slope near the anchor trench (where the largest static (pre-seismic) stresses in the HDPE liner would be expected due to side slope downdrag as the fill compressed and settled over time), was approximately 4 m long and 0.24 m wide. It appears that this tear was initiated at the location of an extrusion welded patch along a longitudinal seam where a sample was removed for destructive testing. (EMCON Associates 1994). Minor cracking was observed in the cover soils of the Primary and Canyon B landfills. At canyons A and D, cracks parallel t the top of the slope were observed in the soil cover. In Canyon A, typical cracks were on the order of 150 mm wide with approximately 130 mm of vertical offset, exposing the landfill side slope liner in some areas. In February 1994, during the landfill gas monitoring, a second tear area in the geomembrane was found in Canyon D. This tear area was comprised of three parallel tears, each approximately, 0.3 m wide with a total length of 27 m, and these tears also occurred at the top of the side slope near the anchor trench"

*The damage sustained to the geosynthetic liner during the 1994 earthquake was significant. In addition, it is concerning that the landfill did not have a back-up generator for crucial operational equipment. This should be a standard safety measure and be inspected regularly, and adjusted to meet the current needs of the landfill, as/if it grows.*

8-2  
cont'd

**Air Quality Concerns:**

**11.2 Methodology**

" Fugitive dust from vehicle travel on unpaved roads would be controlled through watering two times daily, the use of dust palliatives, paving as much as possible, and limiting the maximum vehicle speed to 15 miles per hour, which would result in a combined effective control efficiency of 90 percent (SCAQMD, 2013c; WRAP, 2006b)." **How will this be monitored?**

8-3

**11.3.3 Existing Air Quality**

**11.3.3.1 Attainment Status**

SCAQMD operates a network of ambient air quality monitoring stations located throughout the Basin to characterize the air quality environment. Pollutants monitored include ozone, CO, nitrogen dioxide (NO<sub>2</sub>), particulate matter with aerodynamic diameter less than or equal to 10 microns (PM<sub>10</sub>), particulate matter with aerodynamic diameter less than or equal to 2.5 microns (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), and lead. Depending on whether or not the air quality standards are met or exceeded, an area is classified as being in "attainment" or "nonattainment" for each pollutant. "

8-4

***Common Landfill Gases include Methane, Ammonia, and Sulfides which are not being monitored here. There needs to be data collected specifically METHANE, AMMONIA, VINYL CHLORIDE, HYDROGEN SULFIDE AND VISIBILITY-REDUCING PARTICLES***

**11.3.3.2 Air Monitoring Data**

Ambient air quality data were taken from data published by CARB (on the Aerometric Data Analysis and Management [ADAM] website) and EPA (on the AirData website). Ambient concentrations of ozone, NO<sub>2</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are recorded at monitoring stations located throughout the South Coast Air Basin, in which CCL is located. Three of the nearest monitoring stations were used to gather information regarding the air quality around Chiquita Canyon: Burbank – W Palm Avenue, Reseda, and Santa Clarita stations. The Santa Clarita station is the closest to the project site, approximately 7 miles from the landfill entrance. SO<sub>2</sub> and PM<sub>2.5</sub> monitoring data are not available at the Santa Clarita station, therefore, the Burbank and Reseda stations were used for SO<sub>2</sub> and PM<sub>2.5</sub> data, respectively. A summary of the maximum monitored criteria pollutant concentrations is presented in Table 11-2.

8-5

Monitoring data were taken from the Santa Clarita Monitoring Station monitor, with the exception of SO<sub>2</sub> data, which were taken from the Burbank station, and PM<sub>2.5</sub> data, which were taken from the Reseda station. Hydrogen sulfide, vinyl chloride, and visibility-reducing particles are not monitored.

Only one station used to monitor air quality are is 7 miles close to the landfill which is outside the territory of residents and professionals' proximity to the landfill. The other two stations used are well beyond a reasonable doubt to have accurate air monitoring ability for the effect on Val Verde residents.

**All Stations are not monitoring HYDROGEN SULFIDE, VINYL CHLORIDE AND VRP (visibility-reducing particles)**

Table 11-2 shows the SO<sub>2</sub> levels reported at the Santa Clarita monitoring station during the period beginning in 2009 and ending in 2011. No exceedances occurred between 2009 and 2011 at the Santa Clarita station.

Table 11-2 shows the PM<sub>10</sub> levels reported at the Santa Clarita monitoring station during the period beginning in 2009 and ending in 2011, as well as the number of days in which the state and federal standards were exceeded. Annual and 24-hour state standards were exceeded in 2009. The federal 24-hour standard was not exceeded between 2009 and 2011.

As stated earlier in the report, the Santa Clarita monitoring station does not produce data for PM<sub>10</sub> levels or SO<sub>2</sub> levels... this statement contradicts earlier claims by the reporting party. "SO<sub>2</sub> and PM<sub>2.5</sub> monitoring data are not available at the Santa Clarita sta, respecti

8-6

**11.4.1.3 Conformity**

Under the 1990 CAA amendments, EPA has issued two types of SIP conformity guidelines—transportation conformity rules that apply to transportation plans and projects, and general conformity rules that apply to all other federal actions. Under transportation conformity, the United States Department of Transportation cannot fund, authorize, or approve federal actions to support programs or projects that do not conform to the CAA requirements for a project located in a nonattainment or maintenance area. Under general conformity, EPA requires all federal agencies to ensure that all federal actions must conform to an approved or promulgated state or federal implementation plan if the actions result in criteria pollutant emissions for which the area has been designated as a nonattainment or maintenance area. Though the area is not in attainment of the NAAQS for ozone and PM<sub>2.5</sub>, no federal action is needed for the Proposed Project. Therefore, a general conformity analysis for the Proposed Project is not required.

***How is the non-attainment designated?***

8-7

**11.4.2 State Regulations and Standards**

CARB oversees California air quality policies. CAAQS were first established in 1969 pursuant to the Mulford- Carrell Act. These standards are generally more stringent than the NAAQS and include four additional pollutants: sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particulates. Relevant CAAQS are listed in Table 11-4

**Hydrogen Sulfide Health Effects:**

\*\*\* [https://www.health.ny.gov/environmental/chemicals/hydrogen\\_sulfide/](https://www.health.ny.gov/environmental/chemicals/hydrogen_sulfide/)

Foul odors and health effects were investigated in an Indiana community near a waste disposal lagoon and in five New York State communities near landfills containing construction and demolition debris. Hydrogen sulfide levels in the Indiana community ranged up to 300 ppb during a two-month period. Levels in two of the New York communities ranged up to 4000 ppb for periods of several months. During these episodes

8-8

there were frequent health complaints including eye, throat and lung irritation, nausea, headache, nasal blockage, sleeping difficulties, weight loss, chest pain, and asthma attacks. Although other chemicals may have been present in the air, these effects are consistent with those of hydrogen sulfide.

The main effects of short-term and long-term hydrogen sulfide exposure in laboratory animals are nasal and lung irritation and damage and effects on the brain. These effects are consistent with effects seen in people exposed to hydrogen sulfide.

8-8  
cont'd

### **Occupational Safety & Health Administration**

\*\*\*<https://www.osha.gov/SLTC/hydrogensulfide/hazards.html>

Hydrogen sulfide gas causes a wide range of health effects. Workers are primarily exposed to hydrogen sulfide by breathing it. The effects depend on how much hydrogen sulfide you breathe and for how long. Exposure to very high concentrations can quickly lead to death.

**Short-term (also called acute) symptoms and effects** are shown below:

**Concentration Symptoms/Effects  
(ppm)**

0.00011-0.00033	Typical background concentrations
0.01-1.5	Odor threshold (when rotten egg smell is first noticeable to some). Odor becomes more offensive at 3-5 ppm. Above 30 ppm, odor described as sweet or sickeningly sweet.
2-5	Prolonged exposure may cause nausea, tearing of the eyes, headaches or loss of sleep. Airway problems (bronchial constriction) in some asthma patients.
20	Possible fatigue, loss of appetite, headache, irritability, poor memory, dizziness.
50-100	Slight conjunctivitis ("gas eye") and respiratory tract irritation after 1 hour. May cause digestive upset and loss of appetite.
100	Coughing, eye irritation, loss of smell after 2-15 minutes (olfactory fatigue). Altered breathing, drowsiness after 15-30 minutes. Throat irritation after 1 hour. Gradual increase in severity of symptoms over several hours. Death may occur after 48 hours.
100-150	Loss of smell (olfactory fatigue or paralysis).
200-300	Marked conjunctivitis and respiratory tract irritation after 1 hour. Pulmonary edema may occur from prolonged exposure.
500-700	Staggering, collapse in 5 minutes. Serious damage to the eyes in 30 minutes. Death after 30-60 minutes.
700-1000	Rapid unconsciousness, "knockdown" or immediate collapse within 1 to 2 breaths, breathing stops, death within minutes.
1000-2000	Nearly instant death

8-8  
cont'd

**Vinyl Chloride Health Effects:**

\*\*\*<http://www.epa.gov/ttn/atw/hlthef/vinylchl.html>

**Acute Effects:**

- Acute exposure of humans to high levels of vinyl chloride via inhalation in humans has resulted in effects on the CNS, such as dizziness, drowsiness, headaches, and giddiness. (1,2)
- Vinyl chloride is reported to be slightly irritating to the eyes and respiratory tract in humans. (1,2)

- Acute exposure to extremely high levels of vinyl chloride has caused loss of consciousness, lung and kidney irritation, and inhibition of blood clotting in humans and cardiac arrhythmias in animals. (1)
- Tests involving acute exposure of mice have shown vinyl chloride to have high acute toxicity from inhalation exposure. (5)

**Chronic Effects(Noncancer):**

- Liver damage may result in humans from chronic exposure to vinyl chloride, through both inhalation and oral exposure. (1,2)
- A small percentage of individuals occupationally exposed to high levels of vinyl chloride in air have developed a set of symptoms termed "vinyl chloride disease," which is characterized by Raynaud's phenomenon (fingers blanch and numbness and discomfort are experienced upon exposure to the cold), changes in the bones at the end of the fingers, joint and muscle pain, and scleroderma-like skin changes (thickening of the skin, decreased elasticity, and slight edema). (1,2)
- CNS effects (including dizziness, drowsiness, fatigue, headache, visual and/or hearing disturbances, memory loss, and sleep disturbances) as well as peripheral nervous system symptoms (peripheral neuropathy, tingling, numbness, weakness, and pain in fingers) have also been reported in workers exposed to vinyl chloride. (1)
- Animal studies have reported effects on the liver, kidney, and CNS from chronic exposure to vinyl chloride. (1,6)
- EPA has established a Reference Concentration (RfC) of 0.1 milligrams per cubic meter, and a Reference Dose (RfD) of 0.003 milligrams per kilogram per day for vinyl chloride. Please see IRIS for current information. (8)

**Reproductive/Developmental Effects:**

- Several case reports suggest that male sexual performance may be affected by vinyl chloride. However, these studies are limited by lack of quantitative exposure information and possible co-occurring exposure to other chemicals. (1)
- Several epidemiological studies have reported an association between vinyl chloride exposure in pregnant women and an increased incidence of birth defects, while other studies have not reported similar findings. (1,2)
- Epidemiological studies have suggested an association between men occupationally exposed to vinyl chloride and miscarriages in their wives' pregnancies although other studies have not supported these findings. (1,2)
- Testicular damage and decreased male fertility have been reported in rats exposed to low levels for up to 12 months. (1)
- Animal studies have reported decreased fetal weight and birth defects at levels that are also toxic to maternal animals in the offspring of rats exposed to vinyl chloride through inhalation. (1)

8-8  
cont'd

**Cancer Risk:**

- Inhaled vinyl chloride has been shown to increase the risk of a rare form of liver cancer (angiosarcoma of the liver) in humans. (1,2,6)
- Animal studies have shown that vinyl chloride, via inhalation, increases the incidence of angiosarcoma of the liver and cancer of the liver. (1,2,6)
- Several rat studies show a pronounced early-life susceptibility to the carcinogenic effect of vinyl chloride, i.e., early exposures are associated with higher liver cancer incidence than similar or much longer exposures that occur after maturity. (1)
- EPA has classified vinyl chloride as a Group A, human carcinogen. (8)
- EPA uses mathematical models, based on animal studies, to estimate the probability of a person developing cancer from breathing air containing a specified concentration of a chemical. EPA has calculated an inhalation unit risk estimate of  $8.8 \times 10^{-6}$  ( $\mu\text{g}/\text{m}^3$ )-1 for lifetime exposure to vinyl chloride. Please see IRIS for current information. (8)
- EPA has calculated an oral cancer slope factor of 1.5 ( $\text{mg}/\text{kg}/\text{d}$ )-1 for lifetime exposure to vinyl chloride. Please see IRIS for current information. (8)

**Physical Properties**

- Vinyl chloride is a colorless gas with a mild, sweet odor. (1)
- The odor threshold for vinyl chloride is 3,000 ppm. (4)
- Vinyl chloride is slightly soluble in water and is quite flammable. (1)
- The chemical formula for vinyl chloride is  $\text{C}_2\text{H}_3\text{Cl}$  and the molecular weight is 62.5 g/mol. (1)
- The vapor pressure for vinyl chloride is 2,600 mm Hg at 25 °C, and it has a log octanol/water partition coefficient (log Kow) of 1.36. (1)
- The half-life of vinyl chloride in air is a few hours. (1)

8-8  
cont'd

**11.4.3 Local Regulations and Standards 11.4.3.1 SCAQMD Air Quality Management Plan**

SCAQMD is the local agency responsible for ensuring that federal and state ambient air quality standards are attained in the project area. Periodically, SCAQMD prepares an AQMP to be submitted for inclusion in the SIP. The most recent EPA-approved South Coast SIPs are the Final 1997 Air Quality Management Plan (SCAQMD, 1997) and the Final 1999 Amendment to the 1997 Ozone SIP Revision for the South Coast Air Basin (SCAQMD, 1999).

The most recent AQMP, the Final 2012 AQMP, was adopted by the SCAQMD Board on December 7, 2012 (SCAQMD, 2013d). The Final 2012 AQMP was submitted to EPA for approval on December 20, 2012.

8-9

**11.5.1.1 Landfill Gas Surface Emissions**

8-10

As part of landfill operation, gas wells and pipelines are installed to capture the gas generated by the decaying solid waste. Initially, the LFG is mostly carbon dioxide (CO<sub>2</sub>). As the buried waste ages, the available oxygen

SCAQMD regulations that may apply to operation of the Proposed Project include:

#### Prohibitory Rules (Regulation IV)

SCAQMD Regulation IV contains a number of prohibitory rules that generally apply to facility operations including: decreases and anaerobic conditions are created producing CH<sub>4</sub> and reduced sulfur compounds. CH<sub>4</sub> is a powerful greenhouse gas (GHG) and reduced sulfur compounds have strong odors. Potential GHG impacts from the Proposed Project are discussed in Chapter 12.0, Greenhouse Gas Emissions and Climate Change.

The collected gas is monitored to be sure that the collection system is collecting LFG without drawing in ambient air. The collected gas is combusted in either the LFGTE plant or a flare, converting the CH<sub>4</sub> to CO<sub>2</sub> and reduced sulfur compounds into SO<sub>2</sub>. Two LFG flares, each with a capacity of 4,000 cubic feet per minute, are currently in operation.

The gas wells and pipelines collect an average of 85 percent of the LFG produced, and about 15 percent of the gas generated in the landfill escapes as fugitive emissions. Several actions are taken to minimize these emissions:

Gauge pressure is negative at the gas extraction well

Nitrogen and oxygen concentrations are monitored to minimize excess air infiltration

LFG temperatures at the gas extraction wells are monitored to limit the potential for subsurface fires

CH<sub>4</sub> concentrations across the landfill surface are monitored to prevent seeping of CH<sub>4</sub> gas from the landfill surface.

In addition to the emission sources described above, CCL has underground diesel storage tanks, a material recovery facility, and a truck storage and maintenance facility. Additionally, CCL intends to resume a composting operation, previously active from 1997 to 2009, in the future.

#### Important Things to Know About Landfill Gas

*Ny Department of Health*  
\*\*\*\* [https://www.health.ny.gov/environmental/outdoors/air/landfill\\_gas.htm](https://www.health.ny.gov/environmental/outdoors/air/landfill_gas.htm)

#### Summary

Landfills can produce objectionable odors and landfill gas can move through soil and collect in nearby buildings. Ammonia and hydrogen sulfide are responsible for most of the odors at landfills. Methane is flammable and concentrations have sometimes exceeded explosive levels indoors. Methane and carbon dioxide can also collect in nearby buildings and displace oxygen.

This factsheet provides information on what measures can be taken to prevent gases from leaving landfills and entering off-site structures and how building owners can reduce landfill gas collection indoors, particularly in confined areas like basements and crawl spaces.

8-10  
cont'd

Landfill Gas

Landfill gas contains many different gases. Methane and carbon dioxide make up the majority of landfill gas. The remaining 2 to 10% includes nitrogen, oxygen, ammonia, sulfides, hydrogen and various other gases. Landfill gases are produced when bacteria break down organic waste. The amount of these gases depends on the type of waste present in the landfill, the age of the landfill, oxygen content, the amount of moisture, and temperature. For example, gas production will increase if the temperature or moisture content increases.

## 11.6 Potential Impacts

### 11.6.1 Standards of Significance 11.6.1.1 Criteria under CEQA Context

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, air quality impacts related to the Proposed Project would be significant if the project would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Expose sensitive receptors to substantial pollutant concentrations;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors); or
- Create objectionable odors affecting a substantial number of people.

→ Both are already in conflict w/ the current state of this contract. How are we to monitor or believe this company viable in their practice?

#### Project Design Measures

Same as described above under Impact AQ-1.

Impact AQ-3: Construction would not expose sensitive receptors to substantial pollutant concentrations. Construction impacts would be less than significant.

Impact Discussion. Tables 11-8a and 11-8b present a summary of the maximum health impacts that would occur for construction activities associated with the Proposed Project for project years 2016 and

8-10  
cont'd

8-11

2021, respectively. The locations of the maximum cancer risk and maximum HIC receptors for construction are shown in Figure 11-2.

The maximum construction impact cancer risk from either 2016 or 2021 at the location of the residential maximally exposed individual (MEIR) is predicted to be 0.912 in 1 million. The MEIR is located approximately 340 meters northwest from the facility boundary. The maximum construction impact cancer risk from either 2016 or 2021 at the location of the worker maximally exposed individual (MEIW) is predicted to be 0.728 in 1 million. The MEIW is located approximately 340 meters from the northwest boundary of the facility. The maximum construction impact cancer risk from either 2016 or 2021 at the sensitive receptor location is predicted to be 0.0667 in 1 million. The sensitive receptor is located approximately 1,750 meters from the northeast boundary of the facility. Maximum impacts at the MEIR, MEIW, and sensitive receptor locations would not exceed the SCAQMD cancer risk significance threshold of 10 in 1 million.

The HIC non-carcinogenic impacts from construction would be well below the SCAQMD significance threshold of 1.0.

8-11  
cont'd

THE PROPOSED EXPANSION BRINGS THE LANDFILL CLOSE TO TWO SCHOOLS - SANTA CLARITA VALLEY INTERNATIONAL PUBLIC CHARTER SCHOOL, LIVE OAK, AS WELL AS NUMEROUS CURRENT BUSINESS SITES & FUTURE BUSINESS SITES. I BELIEVE THESE NUMBERS ARE NOT REFLECTED IN THIS THRESHOLD.

One of the most important assurances that local residents of this proposal have is whether or not the applicant of the Conditional Use Permit will comply and follow the mitigation measures, guidelines, federal, state and county laws contained within the CUP.

In the past, the operators of Chiquita Canyon Landfill have flouted these regulations, with little to no repercussions from the County of Los Angeles. One such example can be made with their recent intake of sludge (which is expressly forbidden in the current CUP). The operators of the landfill denied that such waste was entering their landfill (for which they received monetary compensation). A Notice of Violation was issued from the County of Los Angeles, but no meaningful reprimand was enacted, to ensure the local community that violations would cease and that the letter of the CUP would be followed.

8-12

# Letter No. 8

Resident, Unknown

## Response to Comment No. 8-1

Please see Topical Response #11 for a discussion of Geologic Hazards. The Proposed Project does not result in reduced access to Chiquito Canyon Road.

## Response to Comment No. 8-2

Please see Topical Response #11 for a discussion of Geologic Hazards, as well as Topical Response #14 for a discussion of the Landfill Liner System.

The landfill has an appropriately-sized back-up generator in case of a power outage.

## Response to Comment No. 8-3

Best management practices associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the Mitigation Monitoring and Reporting Plan (MMRP) included in the Final EIR. The Lead Agency, Los Angeles Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the South Coast Air Quality Management District (SCAQMD), who will oversee compliance with permit conditions and dust control plans.

## Response to Comment No. 8-4

Please see Topical Response #1, Air Quality, and Topical Response #10, Environmental Monitoring, for a discussion of air quality monitoring.

## Response to Comment No. 8-5

Please see Topical Response #1, Air Quality, and Topical Response #10, Environmental Monitoring, for a discussion of air quality monitoring.

## Response to Comment No. 8-6

Please see Topical Response #1, Air Quality, and Topical Response #10, Environmental Monitoring, for a discussion of air quality monitoring.

## Response to Comment No. 8-7

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects.

## Response to Comment No. 8-8

This comment was addressed in the revised Chapter, Air Quality, of the Partially Recirculated Draft EIR, which describes the results of a health risk assessment of potential health effects of exposure to these chemicals and others in ambient air. As described in Section 11.3.3 of the Partially Recirculated Draft EIR, the area surrounding the Proposed Project is either in attainment or unclassified for the state ambient air quality standard for hydrogen sulfide. In 1984, a California Air Resources Board (CARB) committee concluded that the ambient standard for hydrogen sulfide is adequate to protect public health and to significantly reduce odor annoyance (<https://www.arb.ca.gov/research/aaqs/caaqs/h2s/h2s.htm>. Accessed January 2017).

## Response to Comment No. 8-9

Please see Topical Response #1d, Methods and Models Used in Air Dispersion Modeling, and Impacts to Surrounding Neighborhoods.

## Response to Comment No. 8-10

Please see Topical Response #1a, Air Quality and Emissions, Monitoring, and Health Effects.

## Response to Comment No. 8-11

Existing locations of sensitive receptors and locations of planned schools, residences, and businesses are included in the air quality and health risk analyses for the Proposed Project and Cumulative Impacts analyses for the Proposed Project, even if not specifically identified in the text of the Air Quality chapter. Please see Chapter 11 and Section 11.9 of the Partially Recirculated Draft EIR. Please also see Topical Response #1e, Methods and Models Used in Health Risk Assessment, and Impacts to Surrounding Neighborhoods; and Topical Response #21, Public Health.

## Response to Comment No. 8-12

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance.

CHIQUITA CANYON LANDFILL EXPANSION AND RELATED FACILITIES PROJECT 89-081

STATEMENT OF AGREEMENTS AND UNDERSTANDINGS BY AND BETWEEN

NEWHALL LAND AND FARMING CO. LAIDLAW WASTE SYSTEMS (CHIQUITA), INC. VAL VERDE CIVIC ASSOCIATION

REGIONAL PLANNING COMMISSION

- 1. Laidlaw agrees to add the name of a contact person, phone number, physical and electronic addresses, and the contact person's supervisor to each entity identified in the February 1997 document entitled:

"Regulatory Process for the Permitting of the Landfill expansion and Material Recovery Facilities and a Description of the General Regulatory Oversight Environment During Normal Operations"

- 2. All parties agree to review and approve the attached list of approved possible expenditures of the annual Community Benefit Fund (Attachment A).
3. Laidlaw agrees to participate in good faith, on a regular basis, with the Community Advisory Committee and to assist wherever possible in furthering communication between the community of Val Verde and the landfill, including information sharing, education, understanding of landfill operations, and response to calls.
4. Val Verde Civic Association agrees to attend the Board of Supervisors hearing on February 25, 1997, and give oral and written testimony that their concerns have been satisfied.
5. Val Verde Civic Association agrees to oppose any action by any party to deny CUP 89-081-(5) during the appeals process and subsequent regulatory approval process.
6. The parties agree community benefit funds shall be dispersed according to the attached Payment Schedule (Attachment B).

9-1 see entire letter

7. All conditions of CUP 89-081 (5) shall remain as approved by the Regional Planning Commission except as noted in Attachment C, Proposed Modification for Board of Supervisors' Anticipated Action 2/25/97.
8. Val Verde Civic Association agrees no funds received at any time as a result of approval of CUP 89-081 shall be used in any manner against the good name or activities of The Newhall Land and Farming Co. and its subsidiaries, the landfill operator, and/or landowner, in any way.
9. Val Verde Civic Association agrees to accept the Memorandum of Understanding between Laidlaw and the United Water Conservation District as mitigation of water issues, Laidlaw agrees to provide the Community Advisory Committee with any and all reports, data, and information provided to the District from the landfill and/or provided by the District to the landfill. *within 5 working days.*
10. Laidlaw and Newhall Land and Farming Co. agree to legally bind all successors in interest in all conditions of approval of CUP 89-081 (5) and all agreements between the parties. Val Verde Civic Association agrees to execute the legal documents needed to accomplish this and any other documents needed for the fulfillment of these agreements and understandings.
11. If any term or provision of this Statement of Agreements and Understandings ("Agreement") is determined to be invalid or unenforceable, the remaining terms and provisions shall not be affected thereby and shall remain in full force and effect to the maximum extent permitted by law.
12. If any party to this Agreement is a corporation, trust, general or limited partnership, or community organization, each individual executing this Agreement on behalf of such entity represents and warrants that he or she is duly authorized to execute and deliver this Agreement on behalf of said entity.

*PPS  
H. Green  
Burt*

Dated: February 21, 1997

LIDLAW WASTE SYSTEMS (CHIQUITA), INC.

By: *Rodney W. Walter II*  
 Printed Name: RODNEY W. WALTER II  
 Title: GENERAL MANAGER

Dated: February 21, 1997

NEWHALL LAND AND FARMING CO.

By: *Gary M. Cusumano*  
 Printed Name: GARY M. CUSUMANO  
 Title: President

*[Handwritten initials]*

Dated: February 24 1997

VAL VERDE CIVIC ASSOCIATION

By: *Rita P. Griffin*  
Printed Name: RITA P. GRIFFIN  
Title: PRESIDENT

Dated: February 24, 1997

CITIZENS AGAINST CHIQUITA

By: *Merry Farmer*  
Printed Name: MERRY FARMER  
Title: CHAIRPERSON

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Hess*

ATTACHMENT A

VAL VERDE  
COMMUNITY BENEFITS FUNDS

LIST OF PERMITTED EXPENDITURES

A. General Community Welfare

1. Increase opportunities for the children, <sup>adults and seniors</sup> and youth of the community

- Examples:
- a. Bi-lingual education
  - b. Headstart type programs
  - c. Computer training
  - d. Literacy skills enhancement
  - e. Increased library services
  - f. Equipment for above

2. Increase access to health services

- Examples:
- a. Increased availability of Sam Dixon clinic services
  - b. Indigent care programs
  - c. Teen pregnancy programs
  - d. Transportation to medical services

3. Promote programs and activities for youth and "at risk" youth

- Examples:
- a. Youth sports, such as Midnight Basketball
  - b. Youth education
  - c. Job skills training
  - d. Participation in Sheriff's "at risk" programs

B. Capital Investment Programs

1. Aesthetic improvements

- Examples:
- a. Rehabilitation of existing publicly owned or non-profit organization owned buildings
  - b. Construction of new community buildings such as library, senior center
  - c. Maintenance of buildings
  - d. LANDSCAPING

C. Administration

1. Costs associated with gathering community input on level of expenditures and furthering understanding in the community of the Community Benefit Fund

Examples: a. Advertising and convening public meetings or forums  
b. Translation services  
c. Recordation of input

2. Costs associated with accountability of funds received and funds spent

Examples: a. Audits  
b. Production of annual financial statement  
c. Tax filings

3. Leveraging of funds

Examples: a. Matching grant programs  
b. Public/private partnerships

4. Technical consultant assistance to address items A, B and C above

Examples: a. Completion of administrative functions above  
b. Contract compliance for community welfare programs

The parties agree any expansion or addition of items to this list requires written approval of the Newhall Land and Farming Co., the landfill operator, the landfill owner, and the Val Verde Civic Association.

Dated: February 21, 1997

LIDLAW WASTE SYSTEMS (CHIQUITA), INC.

By: Rodney W. Walter II  
Printed Name: RODNEY W. WALTER II  
Title: GENERAL MANAGER

Dated: February 21, 1997

NEWHALL LAND AND FARMING CO..

By: Henry M. Cusumano  
Printed Name: HENRY M. CUSUMANO  
Title: President

Dated: February 24, 1997

VAL VERDE CIVIC ASSOCIATION.

By: Ruth P. Griffin  
Printed Name: RUTH P. GRIFFIN  
Title: President

*Handwritten initials and signatures:*  
Oppy  
Henry  
RWW

Dated: February 22, 1997

CITIZENS AGAINST CHIQUITA

By: Merry Farmer  
Printed Name: J MERRY FARMER  
Title: CHAIRPERSON

*Handwritten signatures and initials:*  
Merry Farmer  
JMF  
flw

ATTACHMENT B

VAL VERDE COMMUNITY BENEFITS FUND  
PAYMENT SCHEDULE

CALENDAR YEAR	250,000 TONS OR MORE		LESS THAN 250,000 TONS	
	OWNER	OPERATOR	OWNER	OPERATOR
Year 1	\$125,000	\$125,000	\$12,500	\$12,500
Year 2	127,500	127,500	12,750	12,750
Year 3	130,050	130,050	13,005	13,005
Year 4	132,651	132,651	13,265	13,265
Year 5	135,304	135,304	13,530	13,530
Year 6	138,010	138,010	13,801	13,801
Year 7	140,770	140,770	14,077	14,077
Year 8	143,586	143,586	14,359	14,359
Year 9	146,457	146,457	14,646	14,646
Year 10	149,387	149,387	14,939	14,939
Year 11	152,374	152,374	15,237	15,237
Year 12	155,422	155,422	15,542	15,542
Year 13	158,530	158,530	15,853	15,853
Year 14	161,701	161,701	16,170	16,170
Year 15	164,935	164,935	16,493	16,493
Year 16	168,234	168,234	16,823	16,823
Year 17	171,598	171,598	17,160	17,160
Year 18	175,030	175,030	17,503	17,503
Year 19	178,531	178,531	17,853	17,853
Year 20	182,101	182,101	18,210	18,210
Year 21	185,743	185,743	18,574	18,574
Year 22	189,458	189,458	18,946	18,946

- Notes: 1. Actual payment to be determined according to the actual tonnage landfilled during the previous calendar year.
2. The Year 1 payment may be pro-rated so as to have all remaining payments paid on the calendar year.

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Page 7

ATTACHMENT C

CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)

PROPOSED MODIFICATIONS TO CUP 89 081-(5)  
CONDITIONS OF APPROVAL AND MONITORING PROGRAM

REGIONAL PLANNING COMMISSION ACTION 9/11/96  
BOARD OF SUPERVISORS ANTICIPATED ACTION 2/25/97

Pgs. 1 & 2, Conditions of Project Approval Condition for Use Permit 89-081-(5), #5 is modified as follows:

- 5. Delete November 24, 2012
- Add November 24, 2019

Page 3, Condition #9 is modified as follows:

- 9a. Add The Landfill shall not accept sludge or sludge components at any time.
- 9b. Add The existing viewshed from Chiquito Canyon Road as presented pictorially to the Board of Supervisors on 2/25/97 shall be protected for the life of the project. The dip in the natural ridgeline along the western boundary shall be maintained or enhanced. Any structure placed on the landfill site, including but not limited to temporary storage areas, any materials recovery facility, composting facility or any other ancillary facilities that may be visible from Chiquito Canyon Road shall be designed to be harmonious with the natural topography and viewshed and shall be reviewed by the Community Advisory Committee.
- Add The landfill operator and the Community Advisory Committee shall work together to prepare a tree planting and maintenance plan for the entire western boundary of the site. The objectives of the plan are to screen landfill operations, enhance the viewshed, establish the minimum number and type of trees necessary to do this and to provide adequate access to monitoring wells. Trees may be planted on slopes on either side of the ridgeline provided the above objectives are met and such planting is practical.
- 9d. Delete 35,000 tons per week and 7 working days
- Add 30,000 tons per week and 6 working days

CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)

PROPOSED MODIFICATIONS TO CUP 89 081-(5)  
CONDITIONS OF APPROVAL AND MONITORING PROGRAM

9g. Add Nothing in this condition shall permit the maximum landfill capacity of 23 million tons to be increased.

9h. Delete sentence as written.

Add "The landfill shall not accept refuse for disposal from 5:00 p.m. on Saturdays through 4:00 a.m. on Mondays. Maintenance activities may occur during these times.

Page 6, Condition #12 is modified as follows:

12a. Second line, the word "biosolids" is deleted.

Page 7, Condition #12 is modified as follows:

12d is deleted and replaced by:

12d. The composting operation shall receive no more than 560 tons per day of green waste and no waste water biosolids (e.g., sludge or sludge components).

Page 9, Condition #20 is modified as follows:

20e is deleted and replaced by:

20e. The landfill operator shall install and maintain temporary litter fences in operating areas and in those areas along the property perimeter that are regularly littered due to the location of the operating area, time of year, and climatic conditions. The landfill operator and the Community Advisory Committee shall work together to identify littered areas in need of fencing.

Add 20g. The landfill operator shall install speed bumps on landfill property in paved areas along the route of trucks leaving the landfill. The purpose of the speed bumps is to knock out dirt and debris accumulated in wheel wells before trucks leave the site.

CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)

PROPOSED MODIFICATIONS TO CUP 89 081-(5)  
CONDITIONS OF APPROVAL AND MONITORING PROGRAM

Add 20h. Landfill personnel shall police Chiquito Canyon Road from SR 126 to the entrance to Val Verde at Rancho Avilos and the surrounding area within 100 feet of the centerline of the road or to any existing fence on private property for the purpose of locating and cleaning up litter in this area. Litter pickup shall be a minimum of one time per month and may be increased, upon agreement between the landfill operator and the Community Advisory Committee, to maintain a litter free environment.

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*free*  
Add 20i. The landfill operator shall provide four free quarterly clean-up days to residents of Val Verde, showing proper identification and proof of residence at the landfill entrance. These days may be Sundays. The operator shall further reimburse the Community Advisory Committee for the cost of providing two rolloff bins in Val Verde on each clean-up day. The operator and Committee may jointly change this program if they mutually determine alternatives to the above can further assist the community.

Page 11, Condition #23 is modified to:

Add The permittee shall have bilingual (Spanish/English) employees available during business hours. The permittee shall arrange to have Spanish speaking operators available for messages 24 hours per day.

Page 13, Condition #34 is modified to:

Add The permittee shall use his best efforts to maximize landfill gas collection consistent with applicable government regulations. The permittee shall use the best available technology when installing and maintaining landfill gas collection systems.

Add Permittee shall purchase a maximum of five combustible gas monitors, at least one of which is able to be used outdoors, an organic vapor analyzer, similar to the monitors used in structures at the Chiquita Canyon Landfill, and provide same to the Community Advisory Committee for placement in locations of concern to the community, as determined by the Committee. These monitors are designed to detect and provide warning in the event of a build-up of methane gas. The Committee shall be responsible for locating, monitoring and maintaining such monitors. In the event such monitors indicate discernible levels of methane gas, the Committee and the landfill operator shall jointly investigate the situation and if it is determined that the

CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)

PROPOSED MODIFICATIONS TO CUP 89 081-(5)  
CONDITIONS OF APPROVAL AND MONITORING PROGRAM

landfill is the cause of such methane gas build-up, the landfill operator will take corrective action.

- Add The permittee shall work with the Citizens Advisory Committee in understanding the requirements of Rule 1150.1 governing the control of gaseous emissions from active landfills. The permittee shall forward copies of any notices or reports filed with or received from the regulatory agency or agencies responsible for oversight.

Page 15, Condition #42

- Add The permittee shall perform an economic viability and marketing study on an annual basis to assess opportunities to implement a materials recovery facility in an expeditious manner. *NOTHING IN THIS CONDITION SHALL MANDATE THE PERMITTEE TO IMPLEMENT A MATERIALS RECOVERY FACILITY.*

Page 15, New Condition #43:

- Add The permittee shall present its Emergency Response Plan to the Community Advisory Committee and develop an additional component with the Committee for emergency notification to the Val Verde community. The landfill operator shall bear the reasonable costs, if any, of plan implementation.

New Condition #44

- Add The permittee and the land owner shall establish an ongoing Val Verde Community Benefits Fund for the life of the project as follows:

The minimum funding provided during any annual period when the landfill has accepted less than 250,000 tons of waste for disposal in the previous calendar year shall be \$12,500 from the owner and \$12,500 from the operator. If the landfill is accepting waste for disposal during any annual period and accepted 250,000 tons of waste for disposal or more in the previous calendar year, the funding to be paid for that annual period will be \$125,000 from the owner and \$125,000 from the operator. The funding amount shall be adjusted 2% per year.

*AS DIRECTED BY THE COUNTY  
THIS CONDITION #44 MAY BE  
MORE APPROPRIATE IN THE  
STATEMENT OF AGREEMENTS  
AS ITEM # 13*

CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)

PROPOSED MODIFICATIONS TO CUP 89 081-(5)

CONDITIONS OF APPROVAL AND MONITORING PROGRAM

The commencement date for provision of funds shall be the later of (1) January 1, 1998 or (2) the date upon which all of the County approvals and the subsequent approvals are complete and effective and no appeals, litigation or other challenges to such approvals are pending or permitted pursuant to applicable statutes of limitation.

The payment for the first year may be pro-rated so as to have all subsequent payments made on a calendar year basis.

New Condition #45:

Add The permittee shall purchase translation equipment as specified by the Val Verde Civic Association for a one time cost not to exceed \$8,000, by or before the first payment is made in Condition #44.

New Condition #46

Add The maximum total capacity of the landfill shall be 23 million tons. Landfill closure shall occur when this capacity is reached or by November 24, 2019, whichever occurs first.

New Condition #47

Add In the event that permittee is precluded from utilizing this grant as a result of a lawsuit, permittee may continue to operate the existing landfill under CUP 1809-(5) beyond the November 24, 1997 expiration date applicable to, and subject to all other conditions and limitations set forth in CUP 1809-(5) until completion of the design shown on the latest approved Exhibit A on file with CUP 1809-(5) or November 24, 2000, or until lawsuit resolution granting this CUP 89 081-(5), which ever occurs first.

CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)

PROPOSED MODIFICATIONS TO CUP 89 081-(5)  
CONDITIONS OF APPROVAL AND MONITORING PROGRAM

MONITORING PROGRAM MODIFICATIONS

Page 2, Attachment to Conditions, Monitoring Program, Part I Landfill Elevations, A, third line, shall be modified to read as follows:

“... the permittee shall install *permanent* survey monuments ...”

Pages 7 and 8, Attachment to Conditions, Part VII, Monitoring Reports, shall be modified as follows:

Add The Community Advisory Committee shall receive a copy of the completed report and agency comments upon submittal to the Regional Planning Commission. *all reports*  
The permittee and its technical staff shall be available to present the findings and implications of the report at no cost, in a timely manner, to the Community Advisory Committee upon request. *within 5 work days*

*This section will be forwarded to the Community Advisory Comm*  
*PP*

*within 5 work days*  
*PP*

Page 9 - Attachment to Conditions, Part VIII, Community Advisory Committee, shall be modified as follows:

Add “The committee shall be comprised of a majority of persons who reside in Val Verde.

Delete “persons who reside in the vicinity of the site.”

Page 9, Part VIII, #3

Delete \$11,000 per annum

Add \$20,000 per annum

## ATTACHMENT D

### ELECTION REQUIREMENTS FOR THE COMMUNITY BENEFITS FUNDING COMMITTEE

#### Section 1. The First Election of Voting Members

- a. The Executive Committee of the Val Verde Civic Association (the "Association") shall coordinate and call the first election for the five Voting Members of the Community Benefits Funding Committee (the "Committee") in strict compliance with the requirements of this Attachment D.
- b. The first election must occur by September 30, 1997, and the Voting Members elected at that election shall take their positions immediately.
- c. At the first election, all five Voting Members will be elected. The three highest vote getters will be designated as holding the "odd year" positions with those positions becoming open for new elections in 1999 and in every odd-numbered year thereafter. The other two Voting Members will be designated as holding the "even year" positions with those positions becoming open for new elections in 1998 and in every even-numbered year thereafter.
- d. The election procedural duties given by this Attachment D to the Committee's Voting Members (as set forth in Section 3 below) shall be exercised, for the first election only, by the Executive Committee of the Association with assistance from the Non-Voting Member designated by the Los Angeles County Supervisor for the district that includes the Chiquita Canyon Landfill.

#### Section 2. Subsequent Elections of Voting Members

After the first election of the Voting Members, the Committee shall coordinate and call all future elections of its Voting Members, which elections must occur during the months of October or November each year. All subsequently elected Voting Members shall take their positions effective as of December 1 following their election.

#### Section 3. Conduct of Elections

The five Voting Members will be elected by an open, inclusive, annual, privately-run election process, as set forth below.

- a. A notice of election providing the date, time, purpose, and location of the election must be published not less than three weeks nor more than eight weeks before the date of the election in two community newspapers selected by the Voting Members and serving the Val Verde community, one of which

must be an English-language newspaper and one of which must be a Spanish-language newspaper. For the first election, notice must be published in The Signal and La Opinion.

- b. A bilingual (English and Spanish) notice of the election must be posted in a prominent location in the community of Val Verde at least three weeks before the election and must remain posted continuously until the election. In the event of any vandalism defacing or removing the posted election notice, notice shall be replaced or repaired as soon as reasonably possible and the act of vandalism shall not prevent the election from occurring as scheduled.
- c. The election shall take place within the community of Val Verde if reasonably practicable or, if no venue within Val Verde is reasonably available, as close to Val Verde as is practicable.
- d. The election shall be held from 7:00 a.m. to 7:00 p.m., and shall be held on a Tuesday, Wednesday, or Thursday, but not on any legal holiday.
- e. All persons registered to vote in the community of Val Verde, County of Los Angeles, whose primary residence is in the community of Val Verde and who attend the election in person shall be eligible to vote for the Voting Member positions being elected at that election.
- f. Any person registered to vote in the community of Val Verde, County of Los Angeles, and whose primary residence is in the community of Val Verde shall be eligible to be nominated as a candidate for any Voting Member position. If any person serves two consecutive terms as a Voting Member, then such person shall not be eligible to serve as a Voting Member for at least one year.
- g. Candidates wishing to run for the Voting Member openings shall obtain an application from the Committee in advance of the election. Bilingual notice of the availability of the applications shall be posted on the community bulletin board at Val Verde Park at least two months in advance of the election. The completed applications must be returned to the Committee at least 30 days prior to the election. The application must include the signatures of five qualified voters, in addition to the candidate, supporting the candidate's nomination.
- h. Election shall be by secret ballot and each eligible resident shall be entitled to cast one vote for each position open, and the highest eligible vote-getters shall be elected.

- i. In the event of an exact tie, the then-current Voting Members, including the outgoing Voting Members, shall break the tie by selecting one of the tied voters to fill the position.

Section 4. Definition of Community of Val Verde

For purposes of this Attachment D, the "community of Val Verde" shall mean that portion of Los Angeles County, State of California, described as follows:

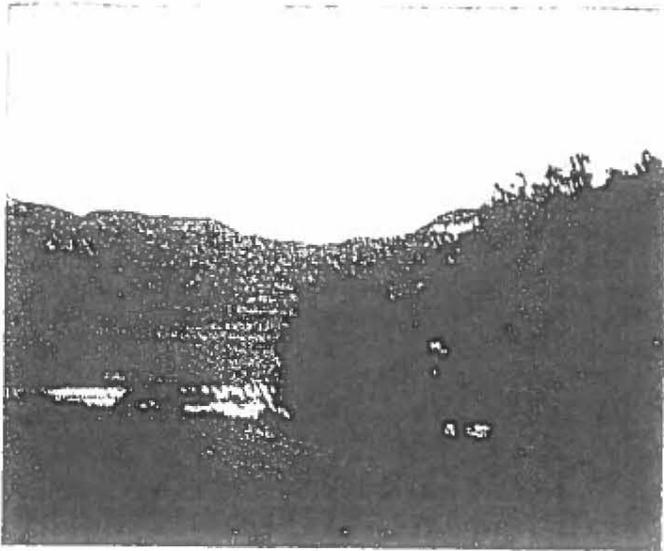
From the Val Verde, California, U.S.G.S. 7.5 minute series topographic map (photorevised 1988):

The northeast quarter of Section 8, all of Section 9, and the west half of Section 10, all of Township 4 North, Range 17 West, S.B.M.

EXCEPTING THEREFROM the southwest quarter of said Section 9 and the north half of the northwest quarter of Section 10.

Notwithstanding the foregoing description, the following addresses shall be deemed to be within the community of Val Verde:

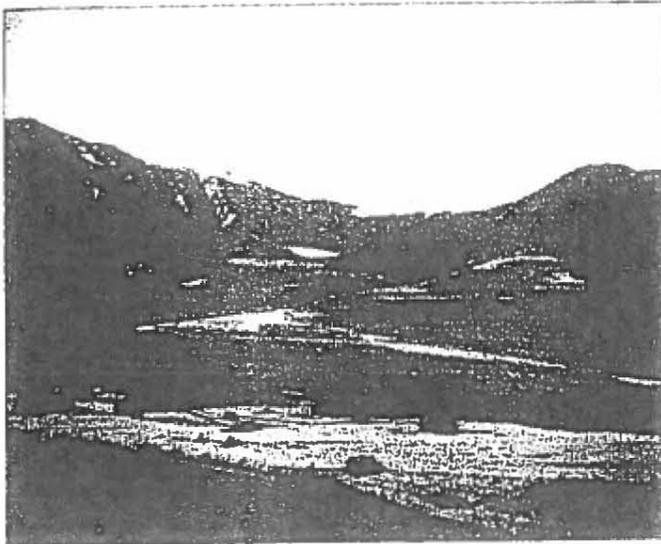
- a. 29050 Elk Street;
- b. 29053 Coolidge Avenue;
- c. 31513 San Martinez Road; and
- d. 31510 San Martinez Road.



2-14-97



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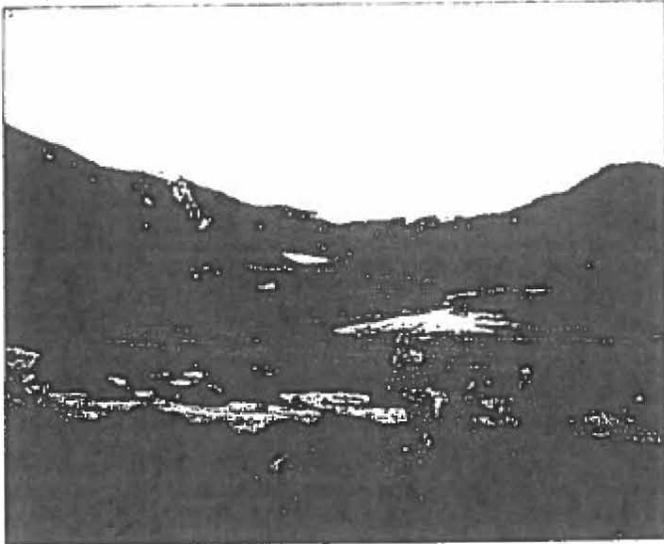
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## Letter No. 9

Resident, Unknown  
California

### Response to Comment No. 9-1

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.





<p style="text-align: right;">Page 5</p> <p>1 miles west of the 5 Freeway and State Route 126, and 33 2 miles north from Los Angeles.</p> <p>3 The subject site is zoned 82 Heavy Commercial 4 and the Santa Clarita Valley area Planning Commission 5 (inaudible).</p> <p>6 The Applicant, Chiquita Canyon Landfill, is 7 requesting a conditional-use permit for the continued 8 needs and expansion of an existing Class III landfill.</p> <p>9 Landfills are allowed to expand under conditional 10 use permits. The County has determined that environmental 11 impact report is required for the project, and part of the 12 purpose of tonight's hearing is to gather testimony on the 13 draft EIR which was released for public review on July 10, 14 2013. And the original review period was to end on August 15 24th, 2014.</p> <p>16 A time extension was approved by the Department 17 of Regional Planning, and the public review committee will 18 now extend to September 23, 2014.</p> <p>19 The existing and proposed land use is a Class III 20 landfill surrounding a land use of agriculture land, 21 single-family residences, and industrial.</p> <p>22 The proposed project will be to continue 23 operation of the existing Class III landfill. The project 24 includes a lateral extension of 1043 acres and increased 25 lateral expansion of 1,573 feet.</p>	<p style="text-align: right;">Page 7</p> <p>1 which will end on September 23, 2014, and will be 2 responded to in the final EIR. The final EIR staff 3 analysis and recommendation will go to the Regional 4 Planning Commission and Hearing. The commission can 5 certify or reject the EIR and project.</p> <p>6 This concludes my presentation.</p> <p>7 MS. NATOLI: Thank you very much.</p> <p>8 At this time, I would like to ask the applicant 9 to come forward and make a presentation.</p> <p>10 For everyone's information, the meeting tonight 11 and this hearing is being recorded by a court reporter. 12 We also have a translator for available for Spanish. So 13 with both of those pieces of information, I would ask that 14 you keep in mind we have a court reporter who's trying to 15 listen in a room with lots of echoes. We may have a 16 little trouble hearing. Try not to speak too quickly.</p> <p>17 As for the applicant, also, if you would keep in 18 mind that there may be a Spanish translation and also the 19 court reporter trying to get everything down, just keep 20 that in mind.</p> <p>21 Thank you. Please proceed.</p> <p>22 MS. EELLS: Thank you, Madam Hearing Examiner. 23 And good evening everyone. My name is Brenda Eells. I'm 24 with CH2M Hill. We are the consulting firm that was hired 25 to prepare the ground development and land report for the</p>
<p style="text-align: right;">Page 6</p> <p>1 The daily receivable tonnage will increase from 2 6,000 to 12,000 tons. The permitted maximum local tonnage 3 will increase from 30,000 to 60,000 tons.</p> <p>4 A new entranceway and support buildings will be 5 constructed. A new Household Hazardous Waste Facility 6 will be built onsite. Mixed organic composting will be an 7 accessory use. (Inaudible.)</p> <p>8 A Southern California Edison transmission line 9 will be relocated to provide space for the new entrance.</p> <p>10 The draft EIR has looked at the following: Land 11 use, geology and hydrology, surface water drainage, water 12 quality, biological resources, cultural and 13 paleontological resources, traffic and transportation, air 14 quality, greenhouse gas emissions, and climate change, 15 noise, public services and utilities, visual resources, 16 and environmental justice and socio-economics.</p> <p>17 The draft EIR concluded that there are 18 significant and unavoidable impacts regarding air quality 19 and traffic and transportation in that region. Mitigation 20 measures recommended for geology and hydrology, surface 21 water drainage, biological resources, cultural resources, 22 greenhouse gas emissions, and climate change will reduce 23 those factors.</p> <p>24 At tonight's hearing, testimony will be heard on 25 the project and draft EIR throughout the comment period</p>	<p style="text-align: right;">Page 8</p> <p>1 Chiquita Canyon Master Plan Review.</p> <p>2 I'm going to take just a few minutes this evening 3 to talk about Chiquita Canyon, to talk about what is 4 actually being proposed, and what is described in the 5 draft EIR, and briefly describe some of the potential 6 significant issues discussed in the Draft EIR.</p> <p>7 Most of you probably know where Chiquita Canyon 8 is located. It is located just north of SR126, about 9 three miles west of I-5. It is located to the east of 10 Chiquita Canyon Road. It's southeast of the community of 11 Val Verde, and to the north and east are a commerce center 12 and the (inaudible).</p> <p>13 Just a brief history of Chiquita Canyon Landfill. 14 It's been in operation for over 40 years. The landfill 15 serves the Santa Clarita Valley and community. As I just 16 mentioned earlier, it's a landfill that takes trash from 17 households, primarily. No hazardous waste is exposed in 18 the landfill.</p> <p>19 Chiquita Canyon receives most of its waste from 20 large transfer vehicles. That means that the smaller 21 trash trucks that you see driving around your 22 neighborhoods go to a different location initially where 23 trash is sorted, placed on the transfer trucks, and then 24 hauled to Chiquita Canyon Landfill. That means fewer 25 trucks going to the landfill. Fewer trucks means less air</p>

<p style="text-align: right;">Page 9</p> <p>1 quality impacts. Also, Chiquita Canyon has, for the last  2 four or so years, had a two megawatt clean energy  3 facility. That facility converts naturally occurring  4 methane at the landfill, and generates electricity. And  5 the electricity generated by the plant serves about 7,000  6 homes annually.</p> <p>7 The landfill has an overload environmental  8 protections in place. One of the biggies is the composite  9 liner. Essentially, as the landfill is developed, dirt is  10 excavated, the composite liner is laid down. It's a very  11 thick, plastic liner that is impermeable. It's welded  12 seams, and it insures that all waste contained inside that  13 liner can't go anywhere.</p> <p>14 Any liquid generated by the landfill is drained  15 to that liner and is siphoned off and taken off-site for  16 treatment. Also storm water is captured and retained  17 onsite so there's not runoff from the landfill to other  18 areas. Groundwater is tested periodically. And these  19 actions, altogether, ensure that the operation doesn't  20 affect the water quality.</p> <p>21 The landfill uses best management practices and  22 highly trained employees.</p> <p>23 It utilizes a small working face, even though the  24 landfill is quite large. For 257 acres, the typical work  25 face is an eighth of that size at any given time. It's</p>	<p style="text-align: right;">Page 11</p> <p>1 report to that plan, there was -- it was stated that there  2 would be a waste disposal shortfall in the County without  3 expansion of the landfills that are still receiving.</p> <p>4 So the property is 639 acres. Only 257 of those  5 are permitted for waste. What that means is that it --  6 its current conditional use permit does not cover the  7 unused capacity. Essentially, this project is intended to  8 utilize that remaining capacity to benefit LA County.</p> <p>9 Just a quick project overview. The project  10 involves a new entrance from Wolcott Way; the development  11 of a household hazardous waste facility; and a set aside  12 of land for potential future conversion technology; the  13 lateral extension of the waste footprint; vertical  14 extension of the waste footprint; and new disposal tonnage  15 site capacity and site life.</p> <p>16 Currently, the entrance to the facilities --  17 right now, the landfill entrance is off of 126. There's  18 no signal there. When trucks leave the landfill, they're  19 typically making a left-hand turn on to 126. This  20 proposal would move the landfill entrance to Wolcott where  21 there will be a signal entrance. Also looking at the  22 entrance is the location of the new household waste  23 facility. This will provide a permanent site to allow the  24 public to drop off their household waste -- paint and oil,  25 electronics -- and then can be taken off-site for</p>
<p style="text-align: right;">Page 10</p> <p>1 covered daily to reduce dust and to reduce odors. It's  2 surrounded by litter fencing, and also it participates in  3 the Adopt-a-Highway program, and they control 126 for the  4 stretch that's in front of the landfill and also Chiquita  5 Canyon Road.</p> <p>6 One of the most interesting things is they employ  7 mother nature to help control birds at the site. Gulls  8 like trash. And for about 12 years now, Chiquita Canyon  9 has utilized falcons to deter those gulls. Every day, a  10 falconer brings his falcons. The falcons run a set  11 pattern of paths over the landfills to scare off the  12 gulls. And that's good for the landfill, and it's good  13 for the environment.</p> <p>14 I just want to point out real quickly that the  15 landfill has quite a large regulatory oversight. There  16 are about 25 permits that the landfill is required to  17 obtain. The agencies providing oversight are listed up  18 here above me. A number of these -- Public Works, Public  19 Planning, Public Health -- have all contributed to this  20 EIR. This is their document. So they're insuring that  21 this meets the need of the County and provides information  22 that the public needs.</p> <p>23 The proposed project is intended to provide  24 additional waste capacity in LA county. Public Works  25 prepares a County-wide Waste Management Plan. In the last</p>	<p style="text-align: right;">Page 12</p> <p>1 disposal.</p> <p>2 Development of this new landfill entrance would  3 result in the facilities being development at a flat  4 portion at the intersection of 126 and Wolcott Way.</p> <p>5 The site will be provided with a screening berm  6 and wall and landscaping to ensure all the facilities that  7 are located on 126 would be screened from view.</p> <p>8 This drawing right here shows the lateral  9 extension of the footprint of the landfill. The yellow  10 areas of the landfill, that's the area currently permitted  11 for waste. To the south, there's a small orange area and  12 to the northeast -- those are the areas proposed for  13 expansion.</p> <p>14 Additionally, the final elevation of the landfill  15 will increase from its currently permitted elevation by  16 143 feet.</p> <p>17 The top portion of the landfill would still  18 remain below the bridge line that is along the side of the  19 landfill. It is not visible from the community of Val  20 Verde.</p> <p>21 As part of the expansion, the landfill would now  22 increase disposal capacity via daily and weekly disposal  23 tonnage from 6,000 tons per day, 30,000 tons per week, to  24 12,000 tons per day, 60,000 tons per week. This capacity  25 increase would result in decreased sight lines, and</p>

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1 (inaudible) on up from about 21 years. That's described  
 2 in the EIR.  
 3 Environmental controls will continue as they do  
 4 now and expand as necessary for the additional waste.  
 5 These environmental controls include groundwater and  
 6 surface water monitoring, air and gas monitoring, odor  
 7 control, vector control, and compliance with all  
 8 applicable laws and regulations.  
 9 Real quickly I want to repeat what's in the EIR,  
 10 the areas that were evaluated in the EIR, a number of them  
 11 were found to be less than significant. These include  
 12 water quality, air quality except during cumulative  
 13 project, noise, public services and utilities visual  
 14 resources, and environmental.  
 15 The other resources areas that will have a  
 16 significant impact have been found to be reduced with the  
 17 addition of mitigation. These include geology and  
 18 hydrology, surface water drainage, biological resources,  
 19 cultural resources and paleontological resources, traffic  
 20 transportation, and greenhouse gas emission.  
 21 For biological resources, there are a number of  
 22 mitigation measure that are in the draft EIR, one is the  
 23 commitment to work with regional planning to achieve a  
 24 revegetation plan for the site. This would include  
 25 requirements to have either a soil cap at project closure

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1 that would allow for adequate regrowth for planned  
 2 communities, and if that's not possible, there's a plan  
 3 for off-site mitigation to offset habitat loss.  
 4 For culture resources -- many of you know that  
 5 there is a cultural resource in Bowers Cave. We are  
 6 actively working to insure that that cave is protected.  
 7 A number of key observation points were elevated  
 8 (inaudible) one of the those points from Hasley Hills. it  
 9 states in the EIR that a very small portion of the final  
 10 landfill top would be visible from Hasley Hills. But key  
 11 observation points were located in Val Verde, and from  
 12 that community, no view of the landfill was found.  
 13 Thank you very much for coming out tonight. Just  
 14 a quick recap. You're all here tonight to hear about a  
 15 project and provide comments on the Draft EIR. In  
 16 addition, the County is taking comments through September  
 17 23. And when the county public comment period closes,  
 18 there's a final EIR of the comments that will be submitted  
 19 and available for decision making by the Planning  
 20 Commission and potentially, ultimately the Board of  
 21 Supervisors.  
 22 That's my presentation. Thank you very much.  
 23 I will be available after the meeting in the back of the  
 24 room by the posters if there are any additional questions.  
 25 Thank you very much.

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1 MS. NATOLI: Thank you very much. At this time  
 2 we will be open for public hearing. If there's anyone who  
 3 has come in since the beginning of the meeting and has not  
 4 yet been sworn in but plans to testify tonight, I'd like  
 5 to -- before we start testimony -- ask those people to  
 6 stand and be sworn in. So if you plan on testifying and  
 7 have not yet been sworn in, please stand at this time to  
 8 be sworn. Thank you.  
 9 Do each of you swear or affirm under penalty of  
 10 perjury that the testimony you may give in this matter now  
 11 pending before this hearing examiner shall be the truth,  
 12 the whole truth, and nothing but the truth?  
 13 THE AUDIENCE: Yes.  
 14 MS. NATOLI: Thank you. Please be seated.  
 15 What I'm going to ask Mr. McCarthy to do is call  
 16 two testifiers at a time. I'd like both of you to come up  
 17 to the seats. Please speak directly into the microphone.  
 18 As you can tell, we can't really hear you if you move a  
 19 little bit farther away from the microphone. So please  
 20 stay close to the microphone. Please state your name for  
 21 the record so the court reporter can get that down in  
 22 writing. And, again, please remember we're trying to get  
 23 all of this down for the court reporter.  
 24 So, Mr. McCarthy, please call the testifiers,  
 25 please.

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1 MR. McCARTHY: The first testify is Flo Lawrence.  
 2 Flo Lawrence.  
 3 MS. NATOLI: You can call the second one.  
 4 MR. McCARTHY: And Marty Kreisler. Marty  
 5 Kreisler.  
 6 MS. NATOLI: Please, both come forward. You may  
 7 sit down and state your name for the record.  
 8 MS. RUIZ: Pull the microphone forward. You can  
 9 have a seat as well. Come forward.  
 10 MS. NATOLI: If there's an open chair, take it.  
 11 When you finish your testimony, I'm going to ask you to  
 12 vacate the seat and get the next group up.  
 13 What I'd like to do is give everybody three  
 14 minutes to testify, which is the maximum. And if we have  
 15 lots of interruptions, I may have to cut that down. So  
 16 I'd like to be able to get through the testimony whether  
 17 you agree or disagree with the speaker. And what we do  
 18 is, if you agree, you can do this (indicating). I see it.  
 19 I understand that you agree with something. If you don't  
 20 agree, you can give thumbs down. But please keep your  
 21 comments slow. Again, this is a room with a lot of  
 22 echoing, and it will be difficult for everyone to hear  
 23 you.  
 24 So at this time, you may start testimony. Please  
 25 begin. And please state your name for the record.

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1 AUDIENCE SPEAKER: My name is Flo Lawrence. I am  
 2 a resident of Castaic. I have lived here since 1998. For  
 3 the record, I serve on the Castaic Town Council. But  
 4 tonight, I'm speaking for me.  
 5 And I am in favor of this expansion. And I'll  
 6 give you three reasons. I don't think I'm going to need  
 7 nearly three minutes. Oh, it started. I won't need that  
 8 much time.  
 9 LA County needs a place to put solid waste. We  
 10 are consuming at a massive rate. We go to Ralphs, we go  
 11 to McDonald's, we go to Best Buy, we go to Carl's Junior  
 12 where I just went through the drive through to feed my  
 13 kid.  
 14 We have a tremendous amount of waste, and we need  
 15 somewhere to put it. We can't build any more landfills  
 16 right now. The number I heard is Chiquita Canyon is 639  
 17 acres. 257 are permitted for landfill use. That is a lot  
 18 of unused capacity.  
 19 So LA County needs someplace to put their trash.  
 20 It's going to come here. I don't think we're going to be  
 21 able to do anything about that. It may make sense.  
 22 My second reason for the trash to come here is  
 23 because Chiquita Canyon operates an excellent facility.  
 24 They do everything right. I served on the VVCAC. I saw  
 25 all the regulatory agencies that regularly check up on

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1 Chiquita to make sure they're in compliance not only to do  
 2 the minimum -- they do the maximum.  
 3 You heard the report of a small working face.  
 4 They have mitigation measures for odor and litter control.  
 5 They do a good job at running a landfill.  
 6 It's a reality. Until we as a society can learn  
 7 to do something different about all the things we consume  
 8 and then all the things that have to go out in the barrel  
 9 of our driveway, we're going to have to do this. But  
 10 Chiquita Canyon cares and they do it right.  
 11 They have a greenhouse water runoff. They burn the  
 12 methane gas.  
 13 Again, you may not like landfills, but I don't  
 14 know what else we're going to do in the near future,  
 15 because we don't have the technology not to have them.  
 16 You have to have it.  
 17 And this is an operation and example that is a  
 18 leader in the industry. Landfills across the country  
 19 point to Chiquita and look at the way they run this  
 20 operation. It is one of the most regulated industries in  
 21 the land. They do a good job.  
 22 The third thing I want to say is Chiquita is a  
 23 good neighbor. They care. They support a lot of the  
 24 local community organizations. If somebody needs  
 25 something, Chiquita is there for them. I went to a party

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1 at the -- a fund raiser at The Painted Turtle, which is a  
 2 camp for seriously and terminally ill children. Because  
 3 of the Station Fire, the camp had to be closed for the  
 4 summer. Most of the structures survived. But they  
 5 couldn't have the kids up there because of the  
 6 particulates because of the fire.  
 7 When Mike Dean at Chiquita heard about the fire,  
 8 he called them and said "How can I help?" These are the  
 9 kinds of neighbors we need in Castaic.  
 10 It's coming. Let's work with them. And let's  
 11 get these mitigation measures for my community.  
 12 And I took the whole time. I apologize. Thank  
 13 you.  
 14 MS. NATOLI: That's all right. You're allowed.  
 15 Thank you.

16 Please proceed and state your name.

17 AUDIENCE SPEAKER: Hello, everybody. Marty  
 18 Kreisler. And for the record, I'm also on the Castaic  
 19 Town Council, but I'm speaking tonight as an individual.  
 20 I live in Hasley Hills. And there was a slide up  
 21 there showing what the view would be from Hasley Hills. I  
 22 got a CV copy of the EIR, and are these pictures the same  
 23 ones that were in the slide? From what I can tell, it's  
 24 about an hour's walk to go to from Hasley Hills to go to  
 25 the landfill. And when I look at the picture and when I

Page 20

1 rode the streets, essentially what I saw were roof tops in  
 2 the industrial center. And I saw some water tanks in the  
 3 hills. And to my knowledge, the landfill will be on the  
 4 other side of the ridge. There won't really be any view  
 5 at all to my knowledge. And if it is, it will be years  
 6 out. And it will be obstructed. So I see this as a  
 7 non-issue.  
 8 As far as views, I don't think most people even  
 9 know Chiquita Canyon is there or what they do, where the  
 10 trash goes. As the previous speaker said, we absolutely  
 11 need landfills. What are people going to do? They can't  
 12 bury their trash anymore. We have to take it somewhere.  
 13 And this landfill follows new technologies to eliminate  
 14 odors, to eliminate noise, to eliminate, you know,  
 15 anything blowing around. I really feel that we're lucky  
 16 to have this landfill in our neighborhood.  
 17 And there's one final point that I'd like to  
 18 make. And that is there's going to be mitigation fees.  
 19 Landfills have mitigation fees. Normally those fees would  
 20 go directly to the County. But we're very lucky here.  
 21 These mitigation fees are going to go directly into our  
 22 communities. How fortunate for us. We don't have these  
 23 in Castaic now. But Val Verde has a mitigation fee, And I  
 24 don't know how many people that's helped or how many good  
 25 things will come with this expansion. And I know, again,

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1 it may sound like payola or something, but it's just going  
2 to be a wonderful opportunity for this community. And  
3 congratulations to the landfill for offering it and  
4 hopefully for us to receive it.

5 MS. NATOLI: Thank you, Mr. Kreisler.  
6 Mr. McCarthy, Would you call the next two.  
7 MR. McCARTHY: The next will be Nancy Carder,  
8 C-a-r-d-e-r, and Lynne Plambeck. Plambeck.  
9 MS. NATOLI: Please, go ahead, Ms. Carder.

10 AUDIENCE SPEAKER: Okay. My name is  
11 Nancy Carder. I'm a resident. The expansion will double  
12 the tonnage, double the amount of waste, double the amount  
13 of equipment, plus doubling the landfill operations.

14 How can this be good for the health of people  
15 living in Val Verde? This will not only increase asthma  
16 for most people with particulate issues, but will also  
17 increase asthma in elementary schools and other schools  
18 plans. The neighboring community will not only suffer  
19 great loss of air quality, but will also suffer a loss of  
20 property values, other potential loss of quality of life  
21 issues, such as odors coming from the expansion.

22 One of the ways accepted at the landfill is to  
23 treat it with auto shredder residue, made from the  
24 crushing and shredding of materials. It's called ASR. ASR  
25 contains elevated levels of metals, in particular, lead

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1 and cadmium.  
2 And even at low waste levels, sometimes as seen  
3 in the DTSC, in which ASR recycling was caught exposing  
4 hazardous waste levels.

5 At Chiquita Canyon landfill, it is used for daily  
6 covering of landfill. ASR is reduced to heavy metal dust  
7 with equipment operating on top of it. And it can be  
8 spread by winds, water falling. And the ecosystem will  
9 suffer from storm water runoff. Results from the  
10 ASR impact studies are significant.

11 The study in the draft of the EIR shows the view  
12 and the analysis of the Newhall Ranch Road 26th bridge on  
13 I-5. There you have a good view of the landfill. Post  
14 expansion, it will be a giant and slightly looming over  
15 the community. The projected uniform view of the landfill  
16 with vegetation in the draft of the EIR shows a view that  
17 people will not see for several decades. Their view will  
18 be the landfill with trash trucks on the top of it.

19 Nor does the draft EIR show the current berms,  
20 drains, and ditches that are needed on a closed landfill  
21 to keep it structurally sound. It's shows as a pretty  
22 hill as projected in the draft EIR under the cultural  
23 resources section.

24 The draft EIR states the portions of the ceiling  
25 will be (inaudible) to collapse. Aside from earthquakes,

1 degradation of the plain is likely due to the constant  
2 operation on the land.

3 If the 1905 goes through, their boundary  
4 alignment was apparently destroyed as stated in the draft  
5 EIR, how can we trust Chiquita Landfill to protect our  
6 environment.

7 Also significant is the increased potential for  
8 devastating landslides in El Nino conditions like we had  
9 in the winters of 2004 and 2005.

10 MS. NATOLI: Ma'am, I need for you to wrap it up.  
11 AUDIENCE SPEAKER: Okay. The proposed expansion  
12 puts it too close to the Santa Clara River if approved.

13 Also, giving people money in exchange for their  
14 health is bad public policy.

15 MS. NATOLI: Thank you very much.  
16 The longer the wait, the longer it takes for us  
17 to get through testimony. So please let's respect the  
18 speakers -- all speakers and staff and everyone's opinion.

19 Again, I see this.  
20 Please proceed, ma'am.

21 AUDIENCE SPEAKER: My name is Lynne Plambeck. I  
22 represent (inaudible) For planning and the environment.  
23 We provided comments on the notice of preparation. I want  
24 to begin by stating several of the requests we made for  
25 data to be disclosed were not disclosed. And we find that

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1 (inaudible) EIR preparer.

2 MS. NATOLI: Ma'am, just slow down just a little  
3 bit.

4 AUDIENCE SPEAKER: Well, you say I only have  
5 three minutes.

6 MS. NATOLI: We're on pause right now. So just  
7 slow down a little so the court reporter can make the  
8 record. Thank you.

9 AUDIENCE SPEAKER: We're in the third year of a  
10 drought, yet the EIR relied upon the 2011 water supply  
11 assessment from the water company that does not serve the  
12 landfill. It states in the water supply assessment that  
13 it's outside their area.

14 The water company is Valencia Water Company.  
15 They have subsequently given a (inaudible) legally by  
16 Castaic Water Agency. The water supply assessment states  
17 that Valencia is controlled by them. That is not the  
18 case. It's -- the PUC found a decision on -- in February  
19 of this year that they are no longer regulated by Valencia  
20 Water Company.

21 So whether or not Castaic can annex them is the  
22 big issue. Water service is an issue. Water supply  
23 assessment relies on the 2005 water management plan, which  
24 is substantially out of date. And it did not disclose any  
25 of the water issues from two closed wells producing the

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cont'd

1 valley's water supply, or the fact that we have not been  
 2 able to -- been able to get the 5 percent state water  
 3 supply to the area.  
 4 These are major impacts to our water supply and  
 5 they should have been in the draft. But they depended on  
 6 the water supply assessment. The water supply assessment  
 7 must rely on firm contracts, and they must be supplied in  
 8 that assessment, and they did not do this. It's not a  
 9 legal water supply assessment because (inaudible)  
 10 attention of the law to provide us with good information  
 11 on water supply.

10-10

12 I would also like to state that we asked  
 13 specifically for -- comment substantially on Chiquita  
 14 Canyon Landfill. We worked to ensure good water quality  
 15 and monitoring by asking that there be water monitoring  
 16 wells with various levels. In the notice of preparation  
 17 comment letter, we asked that water quality reports be  
 18 disclosed. But the reports were not made available to the  
 19 public. That's a substantial failure to provide  
 20 information of the EIR and its information that everyone  
 21 should be able to see.

10-11

22 They also had a height violation. We would like  
 23 to know how the County's going to protect the community  
 24 and residents from any further violations on their part,  
 25 or let them just go ahead and build, which is what --

1 essentially what happened. And that should be in the EIR  
 2 too. It was disclosed.

3 And I would like to quickly say my comment. When  
 4 I tried to sign up, my card says Number 3. Your staff  
 5 people in the back insisted that there is no public  
 6 comment at the hearing. They crossed out the 3 and had  
 7 the 2. But I -- that is a substantial violation of the  
 8 policies to tell people they can't make a public comment  
 9 on a public hearing. And you need to inform your staff  
 10 people.

11 I was told if I continued to sign up for Number 3  
 12 for public comment, I would be removed from the  
 13 proceedings. That is a problem.

14 MS. NATOLI: Thank you very much.

15 AUDIENCE SPEAKER: I -- and I do want to be  
 16 called for public comment when we get to Number 3.

17 MS. NATOLI: I will call you. It is on the  
 18 agenda. Public comment is on the agenda. Number 3 is  
 19 public comment for items not on the agenda. So that means  
 20 --

21 AUDIENCE SPEAKER: (Inaudible.)

22 MS. NATOLI: And you may, ma'am. But I want to  
 23 make sure that everyone in the audience understands.

24 If you want to speak on the project, sign up for  
 25 the project. If you want to speak on another item that

1 the hearing examiner may have jurisdiction over, you can  
 2 absolutely sign up to speak on another topic, and that  
 3 will be listened to in public comment as well.

4 Would you call the next two testifying, please.

5 MR. McCARTHY: Lloyd Carder and Ramon Hamilton.

6 MS. NATOLI: Please, go ahead and begin, sir.

7 AUDIENCE SPEAKER: Yes. I'd like to start off by  
 8 speaking on one of the documents that was attributed to --

9 MS. NATOLI: Sir, can you state your name for the  
 10 record, please.

11 AUDIENCE SPEAKER: Lloyd Carder.

12 MS. NATOLI: Thank you.

13 AUDIENCE SPEAKER: When I submitted this letter  
 14 it got attributed to Scott Rodell on the town council, and  
 15 not myself. All right. Thank you.

16 In that letter, I talked about notifications.

17 Again, you know, we've been hearing that there's been a  
 18 lot of people have not been notified. I took it upon  
 19 myself to go in through the businesses along the landfill  
 20 site, and none of the 22 businesses that I visited had any  
 21 possible notifications. I can give names and list them to  
 22 you if you'd like.

23 MS. NATOLI: Can you provide them to Ms. Chi  
 24 after the meeting? That would be helpful. Thank you.

25 AUDIENCE SPEAKER: Also, this -- we -- I asked in

10-12

1 this letter to open up the area to be out in the 1.2 to  
 2 1.5 miles, and that was not done. And that was something  
 3 that everyone -- when I met with the staff, they said they  
 4 would do. So we -- they did not do that.

5 The first thing I'd like to talk about, in 1997,  
 6 there was an agreement in place signed by the President of  
 7 Newhall Land and Farm; the landfill representative;  
 8 Ruth Griffin, who was the president of the Val Verde Civic  
 9 Association; and a member of the Castaic Town Council.  
 10 While I was on it for seven years, I was on the land use  
 11 committee prior to becoming a council member myself. I  
 12 worked with her on this program.

13 In this document, they -- it was stated that the  
 14 maximum capacity of the landfill would be 20 million tons,  
 15 and the closing of the landfill would occur after the  
 16 capacity was met. This was the contractual agreement by  
 17 the landfill, and records entered by the people who have  
 18 signed here.

19 It is -- it is far from me to abrogate a contract  
 20 such as this. I find it hard to believe that they're  
 21 operating a landfill in a representative manner to any  
 22 other agreements done today or tomorrow.

23 You know, when -- when the council -- when I --  
 24 when -- I was on the town council from 2000 to 2006.  
 25 During that time, you know, we had multiple projects come

10-13

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1 forward to us. Some of the projects were the Homestead  
 2 Village project. And during that project, we actually  
 3 built in elementary school that's along 126, the same  
 4 route that the trucks would be taking with diesel and the  
 5 trek. I did not see in this draft EIR any of the truck  
 6 traffic, you know, pollution or any of that data.  
 7 MS. NATOLI: Sir, I need for you to wrap up your  
 8 comments.  
 9 AUDIENCE SPEAKER: Okay. The second was we had  
 10 the Homestead Village, which is the project where we had  
 11 the junior high, which was within three quarters of a mile  
 12 of the landfill. All of these projects, when they were  
 13 proposed to us, it was told to us on the council that the  
 14 landfill would be closed before they started.  
 15 MS. NATOLI: Thank you. And just let me remind  
 16 everybody. Tonight doesn't close the comment period. The  
 17 comment period is open through September 23rd. You can  
 18 always submit your comments in writing to Ms. Chi. And  
 19 the comments will be analyzed in the final EIR.  
 20 Yes, sir.  
 21 AUDIENCE SPEAKER: My name is Ramon Hamilton. I  
 22 am a member of the Val Verde Civic Association, but I am  
 23 speaking as an individual.  
 24 So there's been several residents that are right  
 25 up to the landfill that mentioned odors coming from the

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1 landfill. (Inaudible.) And I'm concerned with the  
 2 additional 143 feet in elevation. What sort of monitoring  
 3 will they do in Val Verde to identify odors and potential  
 4 health risks, and what the landfill will do to reduce  
 5 those odors. So that's my first concern.  
 6 So, currently, since this impacts the communities  
 7 already at issue, I'm wondering if the daily tonnage  
 8 intake could stay the same, at 6,000 tons per day. So my  
 9 concern is the maximum is now 6,000 tons per day, is  
 10 already an issue. With that doubling, you know, it's --  
 11 that would be even more of an issue.  
 12 If you just stay at where it currently is, it  
 13 would stay the same.

14 Additionally --  
 15 MS. NATOLI: Please, go ahead.  
 16 AUDIENCE SPEAKER: In 1997, the mutual use permit  
 17 that was put together, as the gentleman just mentioned,  
 18 was a provision that no sludge would be taken in. And I  
 19 know many of the residents are concerned about the sludge,  
 20 including myself. And I'm wondering if the no sludge  
 21 provision would also be added in if this new conditional  
 22 use permit is indeed approved.  
 23 And staying on that subject, since the current --  
 24 since the conditional use permit states there is no  
 25 sludge, this provision was violated. The landfill took in

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1 sludge from Santa Barbara, and they were issued a notice  
 2 of violation from the county.  
 3 There was no notifying of the community or  
 4 penalty. I'm hoping that in the provisions of this new  
 5 conditional use permit, there can be some sort of  
 6 significant fine that can at least deter that type of  
 7 behavior.  
 8 That's it.  
 9 MS. NATOLI: Thank you very much, sir.  
 10 Call the next group, please.  
 11 MR. McCARTHY: Paul Saaty, and Cam Noltemeyer.

12 AUDIENCE SPEAKER: Hello. My name is Paul Saaty  
 13 I'm a new member of the -- new resident of Castaic. And  
 14 I'm outraged at such a proposal that would be addressed  
 15 after the agreements that would have closed the landfill.  
 16 Someone else said that Castaic is not known for  
 17 the landfill. They're right. But they will be. The  
 18 tripling of this landfill is something that, you know, not  
 19 many people are really aware of. We look at little maps  
 20 like the one that's on the poster back there where there's  
 21 the big gray map with a little tiny speck of a proposed  
 22 landfill. People do not know the size and scope and how  
 23 this is going to come up against the industrial center and  
 24 Hasley Hills.  
 25 You've got residents that are moving here since

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1 1997 with the idea that this landfill's going to be  
 2 closed. They have homes. They have values.  
 3 Somebody mentioned some ridiculous idea that  
 4 we're going to get some mitigation money. What is there  
 5 to mitigate the falling house prices that we have in Val  
 6 Verde? You can get a house in Val Verde for next to  
 7 nothing because no one wants to live next to a landfill.  
 8 Now we all will live next to a landfill.  
 9 I almost bought a house up in Fulsom a few years  
 10 ago. Beautiful house. No one wanted to live there  
 11 because it was known as the place where the prison is. We  
 12 not only have a prison that we're well known for, but now  
 13 we will be known as the -- as one of the biggest landfills  
 14 in the area.  
 15 There are a lot of other places that this  
 16 landfill could be put. There are -- there's vacant land  
 17 if you go up the 5 Freeway up in Sacramento. They could  
 18 put it somewhere else. But it's not easy.  
 19 Well, they've been good. Of course they've been  
 20 good. They wanted to put in this expansion, probably, for  
 21 many, many years. Why make the violations then when they  
 22 can make the violations now? They have made violations, I  
 23 hear. Even if they don't, even if they're greet, it's  
 24 going to at least acknowledge the natural smell, that  
 25 stigma of being one of the biggest landfills in the area

10-13  
cont'd

10-15  
cont'd

10-14

10-16

10-15

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10-16 cont'd	<p>1 is going to make our house prices fall.</p> <p>2 I'm sorry. No amount of giving small amounts of</p> <p>3 money for a football team to get new shirts is going to</p> <p>4 make up for my house values plummeting next to nothing.</p> <p>5 My kids, their asthma is going to get worse.</p>		<p>1 landfill. We don't agree or on an extension or expansion</p> <p>2 to Chiquita Canyon Landfill, and we will fight this plan</p> <p>3 with whatever means and tell you to your coordination.</p> <p>4 Sincerely the Dabbagh family, Egram, Enron,</p> <p>5 Andrew, Jordan. And here my phone number.</p> <p>6 MS. NATOLI: Thank you very much, sir.</p> <p>7 MR. McCARTHY: And we have Cam Noltemeyer.</p> <p>8 Michael Mohajer.</p> <p>9 MS. NATOLI: Take a seat. Please state your name</p> <p>10 for the record before you begin.</p> <p>11 AUDIENCE SPEAKER: I'm Cam Noltemeyer, and I'm a</p> <p>12 member of (inaudible) but I'm speaking for myself. I'm</p> <p>13 opposed to this expansion. This is an expansion of one</p> <p>14 that they had promised to close. We all live in Santa</p> <p>15 Clarita Valley, and we're all affected by this. Not just</p> <p>16 those that are receiving the payoff.</p>	10-18 cont'd
10-17	<p>6 There is no way that you can have that much stuff</p> <p>7 -- trash coming into the area without significant</p> <p>8 environmental impact. And the lady who spoke from the</p> <p>9 consulting firm even admitted to the fact that there will</p> <p>10 be significant, if they're going to have to try to</p> <p>11 mitigate.</p> <p>12 Here's a good solution: Don't expand it. Keep</p> <p>13 to your word. Keep to what you signed in '97.</p> <p>14 MS. NATOLI: Thank you, sir.</p> <p>15 Sir.</p>		<p>17 This is the Santa Clarita Valley. I'm very</p> <p>18 disappointed that the planning commissioner for this area</p> <p>19 is not present. He lives in the Santa Clarita Valley and</p> <p>20 it wouldn't have been a very long drive.</p> <p>21 I'm also appalled at the fact that the applicant</p> <p>22 is not presenting correct information. It's been</p> <p>23 misleading, and in some places absolutely incorrect.</p> <p>24 How much of this expansion capacity will be taken</p> <p>25 up by the Newhall Ranch Development? They should be</p>	10-19
	<p>16 AUDIENCE SPEAKER: My name is Akram Dabbagh</p> <p>17 To Los Angeles County -- excuse me. Regional</p> <p>18 Planning Department, we are the community of Lincoln</p> <p>19 Avenue, addresses 28838, 28848, 28874, Chiquita Canyon</p> <p>20 Road. We are the second generation who moved in to Val</p> <p>21 Verde since 30 years ago and bought new houses.</p> <p>22 We firmly refuse any expansion to Chiquita Canyon</p> <p>23 landfill for whatever reasons, or to any renewed timing,</p> <p>24 terms extension, or contract project without acceptance or</p> <p>25 opinion from the local community.</p>		<p>21 I'm also appalled at the fact that the applicant</p> <p>22 is not presenting correct information. It's been</p> <p>23 misleading, and in some places absolutely incorrect.</p> <p>24 How much of this expansion capacity will be taken</p> <p>25 up by the Newhall Ranch Development? They should be</p>	10-20
	Page 34		Page 36	
10-18	<p>1 Since the 1972, the Chiquita Canyon landfill</p> <p>2 exists. And the -- after 40 years, development of a</p> <p>3 thousand houses in Santa Clarita, the value -- and double</p> <p>4 population, the official at the Chiquita Canyon, your</p> <p>5 master plan revision doubling the amount of the trash and</p> <p>6 the space and the life of the landfill.</p> <p>7 And you want to continue with this same business.</p> <p>8 And you see you should close this trash landfill. And you</p> <p>9 look around, the official people doing the opposite way,</p> <p>10 neglecting the communities, and the facts is being guilty</p> <p>11 and must quit.</p> <p>12 Also we reject any community benefits from fund</p> <p>13 for help. There is a choice between development for Val</p> <p>14 Verde, Castaic City, and Hasley Hills residents, and these</p> <p>15 residential communities throughout the future or the</p> <p>16 destroy this large communities backward.</p> <p>17 We decide the hills safe health safety</p> <p>18 environment, and the property values of our life and</p> <p>19 interest.</p> <p>20 Please do not try to enforce the neighborhood</p> <p>21 communities on the decision not to their interest or</p> <p>22 desire --</p> <p>23 MS. NATOLI: Sir?</p> <p>24 AUDIENCE SPEAKER: -- by priority or lead agency.</p> <p>25 There are another signed or places some of which for</p>		<p>1 required to have their own disposable site.</p> <p>2 We don't have to keep taking trash from outside</p> <p>3 of our valley. If they want this big expansion, they</p> <p>4 should do their own dump. We don't have to expand on what</p> <p>5 we have, the valley of the dumps. We have sunshine on one</p> <p>6 side. We have Chiquita on the other. There should be</p> <p>7 enough for the present occupants of this valley.</p> <p>8 But we shouldn't have to take from the greater LA</p> <p>9 area. That is not our responsibility. Nor should dumps</p> <p>10 be in residential areas. We are already suffering in this</p> <p>11 valley. We have, already, air quality problems that have</p> <p>12 jumped in our master plans from extreme to severe -- I'm</p> <p>13 sorry. It's the opposite. Severe to extreme.</p> <p>14 And they're going to have to meet the limits on</p> <p>15 that air quality. But just you give them more time, you</p> <p>16 let it jump up to extreme. And our kids are suffering</p> <p>17 because of that.</p> <p>18 Our water supply from the groundwater that</p> <p>19 supplies half of the water supply for this valley is</p> <p>20 contaminated by precortiate (phonetic). We already have</p> <p>21 wells that are being treated. There are also VOCs which</p> <p>22 are cancerous that are showing up in our water supply.</p> <p>23 Also, we are going to have to be treated</p> <p>24 according to the most recent department of toxic substance</p> <p>25 study. Those are things that have been left from the past</p>	10-21
				10-22
				10-23

10-23 cont'd	<p style="text-align: right;">Page 37</p> <p>1 generations that we have to deal with from this 2 generation.</p>	<p style="text-align: right;">Page 39</p> <p>1 in the program." 2 MS. NATOLI: Sir, I need for you to wrap up your 3 comments, please.</p>	
10-24	<p>3 This dump should not be expanded. The fact that 4 there's -- they're saying they will have a household 5 hazardous waste facility is very, very disturbing. 6 Because just as they are trying to expand this dump after 7 promising to close it, they will come back and try to take 8 other hazardous materials. They do not have any 9 credibility. They've shown that here tonight.</p>	<p>4 AUDIENCE SPEAKER: Well, then I'll just leave it 5 at this. That the study has to be updated. The plan has 6 to be updated completely for the current project. And the 7 older communication program that I have identified is not 8 doing them any service. 9 Thank you very much.</p>	10-26 cont'd
10-25	<p>10 MS. NATOLI: Thank you, ma'am. 11 Go ahead sir. 12 AUDIENCE SPEAKER: My name is Mike Mahajer. I'm 13 a private citizen, and a resident of the City of San 14 Dimas, about 70 miles from this location. And, again, I'm 15 here simply as a private citizen, not representing anyone 16 else. 17 There's a report that identifies that there will 18 be a shortage of disposable capacity in Los Angeles county 19 by approximately 5 million tons by 2026. 20 MS. NATOLI: Sir, could I ask you speak directly 21 into the microphone? I'm having a little trouble with 22 hearing you. I'm sorry. Thank you. 23 AUDIENCE SPEAKER: The project -- under the 24 section that they talked about the need for the project, 25 it is stated that there will be a shortage of disposal</p>	<p>10 MS. NATOLI: You've submitted your comments in 11 writing? 12 AUDIENCE SPEAKER: I have submitted my comments 13 to -- to Iris. And I do want to appreciate your decision 14 for expanding the comment period by 30 days, because it's 15 really the size of this project landfill business of 44 16 years. And it's still not doing it. 17 MS. NATOLI: Thank you, sir. 18 MR. MCCARTHY: And Steven Howse, H-o-w-s-e, and 19 Cynthia Kimura. 20 Steven Howse. 21 MS. NATOLI: Please, go ahead, sir. 22 AUDIENCE SPEAKER: My name is Steven Howse, and 23 I'm a resident of Val Verde. I'm one of the closest 24 residents to the landfill. I've lived there for 16 years 25 and had to deal with considerable amount of odors and</p>	
	<p style="text-align: right;">Page 38</p> <p>1 capacity -- landfill capacity by 5 million tons by the 2 year 2026. However, the study doesn't mention whether 3 this landfill -- if its expansion is going to be used only 4 by the jurisdiction that -- the jurisdiction of 5 Los Angeles County, or is it going to be accepting solid 6 waste from out of county? 7 And it's really critical, because you can see it 8 all based on -- all over United States. Based on all over 9 California. So that's a critical mistake.</p>	<p style="text-align: right;">Page 40</p> <p>1 different things, you know, from the landfill, something 2 that I brought up over the years numerous times. Never 3 have heard any actions on their part. Just, you know, 4 they're going to clean it up, or you're not really 5 smelling anything, or odors coming from somewhere else. 6 After so many years and making complaints and not 7 listening, you start giving up. The consensus that I had 8 was that my hope was in the 1997 expansion that all this 9 would go away on November 24, 2019. If I could just make 10 it that long, then the landfill's going to close, and I -- 11 I'm not going to have to do this anymore.</p>	10-27
10-26	<p>12 I also found -- found out that the study that 13 they presented is completely out of date. And that is 14 critical. And that is due to some of the legislative 15 action that has taken place after AB99 was enacted. 16 Specifically, Senate bill 1016, and that was 17 enacted in 2008, AB 341 enacted in 2011, is dealing with 18 the same issue. AB32, the California global warming 19 solution act. They're updates to the plan which was 20 adopted by the California Resources Board on May 22nd, 21 2014, approximately 60 days ago. 22 Let me read what the document I said indicates. 23 It says "California Air Resources Board and California 24 Department of Recycling and Recovery believe the 25 development of -- the development of programs to eliminate disposal of materials option to be evaluated include legislation directly in relation and inclusion of landfill</p>	<p>12 And then with the landfill expansion under new 13 condition 46 says the maximum total capacity of the 14 landfill will not exceed 23 million tons. Landfill 15 closure shall occur when this capacity is reached or by 16 November 24, 2019, whichever occurred first. 17 This is a legal document. A legal contract as 18 far as I'm concerned, and as far as legal is concerned. I 19 would think that this contract should be honored. And so 20 I am having trouble understanding why it is that we're 21 even having a meeting on the expansion of the landfill if 22 it's already been stated in the contract and everybody 23 else agreed that it's going to close at this time. 24 You know? a couple of other things that I'm 25 really concerned about is some of the practices of the</p>	10-28

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1 landfill. I know they're trying real hard to do things  
2 correctly, but I'm really concerned about the health of my  
3 family and my kids and stuff like that.

4 Some of the things that are happening is we have  
5 proof that they've taken in sludge. And under the  
6 contract, they're not able to take in sludge. That's a  
7 violation of the contract. I guess there was, you know --  
8 nothing was ever done to the landfill as far as a fine or  
9 a fee or anything. It seems like it just has gone away.  
10 It was extremely difficult for us to find out any  
11 information about it. They continue to deny that they  
12 even took in sludge.

13 And so my -- my concern is there just for the  
14 health of my family and the odors I'm smelling, which  
15 recently -- since the expansion has come up, I've had  
16 numerous residents come down to my house and smelling  
17 continually what I'm dealing with.

18 One of the interesting things is some friends  
19 that live farther up and they, literally, within a half  
20 hour of arriving at my house, have said that they're  
21 nauseous and sick to their stomach and head hurts. To me,  
22 it was a normal day. It wasn't even one of the bad days.

23 So my concern is that I'm willing to look at this  
24 stuff as bad. So I'm very much against, you know, the  
25 expanding landfill. I'd like to see it close by November

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1 24, 2014, as in the original contract.

2 MS. NATOLI: Thank you.

3 Ma'am, please proceed.

4 AUDIENCE SPEAKER: Hello. My name is  
5 Cynthia Kimura from Val Verde. We already have one of the  
6 largest landfills in the country. If you double the  
7 footprint, we will have the equivalent of two of the  
8 largest landfills in the country.

9 We were promised the landfill would close in  
10 2019. Now another expansion is being proposed again.  
11 When will this end? An additional 21 years is a long  
12 time.

13 This "good neighbor" took in sludge. This is  
14 forbidden by the agreement. Another incident happened  
15 where a recycling company dumped hazardous materials in  
16 the landfill.

17 Both times, there was no fine or penalty. I'd  
18 like to know what will there be in addition to "I'm  
19 sorry"? If they accept sludge or other potentially  
20 hazardous materials knowingly or unknowingly, what will be  
21 the recourse? Will samples be taken from soil,  
22 groundwater, or air? How about will the community be  
23 informed?

24 We would like to make all the findings public.  
25 We need to be informed. With both of these incidents, we

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1 were not informed. Residents had to find this information  
2 themselves.

3 Also, the landfill's proposed expansion is going  
4 to be 13 stories higher. What will the additional impact  
5 for the community be? Additional odors and dust? Trash  
6 and sludge over the ridge line?

7 Also, if the hillsides come down through acts of  
8 nature or man, (inaudible). What will be the  
9 environmental impact? How will the landfill know what  
10 parts are leaking? How will the residents be informed of  
11 the leaks and when the liners leak?

12 I think these are basically my concerns.  
13 MS. NATOLI: Thank you very much.  
14 MR. McCARTHY: And next we have Emma Johanna  
15 Brown. Humberto Paniagua. Emma Brown? Did she leave?  
16 MS. NATOLI: Emma Brown?  
17 We -- we need a translator. And the translator  
18 is ready to go. Please, sir, please proceed.  
19 AUDIENCE SPEAKER: (Through interpreter) my name  
20 is Humberto --  
21 MS. NATOLI: We can't hear you.  
22 (Brief interruption.)  
23 MS. NATOLI: Just so you know, it's very  
24 difficult to keep testimony during a translation to three  
25 minutes because there's too much stop for back and forth.

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1 Are you ready?  
2 AUDIENCE SPEAKER: (Through interpreter) good  
3 afternoon, my name is Humberto.  
4 MS. RUIZ: You need to come out here.  
5 MS. NATOLI: In case you hadn't noticed, what  
6 Rosie says goes.  
7 MS. NATOLI: Okay. Let's try it now.  
8 Please begin again.

9 AUDIENCE SPEAKER: My name is Humberto. And I'm  
10 a resident. I want to speak directly.  
11 MS. RUIZ: Anna, can you also translate that  
12 you're going to be translating? We'll work with it.  
13 MS. NATOLI: Okay. I'm sorry.  
14 AUDIENCE SPEAKER: (Through interpreter) what I  
15 was saying is that I'm against the expansion.  
16 And you were saying that you were controlling the  
17 gasses and water. As -- as a matter of fact, I have a  
18 very serious problems with this. I have a backyard and I  
19 have roaches, I have squirrels, I have all kinds of pests.  
20 And about two years ago, this -- underneath the  
21 house, because they have the lining there, and they broke  
22 the pipes because there are so many animals. And the  
23 pipes that were broken, and they have to be repaired. I  
24 have to pay, like, 1,800 so they can be repaired. And we  
25 are always dealing with this issue of why do we have so

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cont'd

1 many animals and why we have so much clouds. We have to  
2 keep the windows closed.

3 The noise -- the noise is also a great deal of  
4 problems. I don't have the operating right now, but at  
5 5:00 o'clock in the morning, it seems like you can hear  
6 the noise of the machinery.

10-36

7 And I don't know -- I'm not certain if they're  
8 dumping trash right now, but I live on top of the hill,  
9 and from the top of the hill, there is a lot of noise and  
10 pollution. And I'm not sure if there's a lot of wind  
11 that's picking up all the dust and the noise or the odors  
12 but that's what's happening.

13 And that's -- that is what I really have on my  
14 mind. A lot -- way too much time of dealing with this.  
15 And this is all my comments. Thank you so much.

16 MS. NATOLI: Gracias.

17 MR. McCARTHY: Darcy Stinson and Erica Larson.

18 MS. NATOLI: Please, go ahead, sir.

19 AUDIENCE SPEAKER: My name is Darcy Stinson. I'm  
20 a resident of Val Verde. I live on Lincoln Avenue.

21 I have been complaining about the landfill, oh,  
22 forever. I moved in in 2008. I have heard many, many  
23 many excuses about why it smells. I've had the AQMD out  
24 to my house confirming that it smells.

25 Today, we were at a neighbor's house that -- and

10-37

1 we had two LA County Animal Control employees for, you  
2 know -- there was a complaint for odor is what the animal  
3 control said that they were going to be out there for, and  
4 this neighbor has a ranch. And so there was a couple  
5 residents. And a few residents with him with these two  
6 officers.

7 We went by the horses and cows and everything and  
8 they said that, you know, the smell wasn't that bad.  
9 And we got up towards the back where there isn't animals,  
10 and we were all hit with an odor. Two officers from LA  
11 County Animal Control called AQMD today and reported they  
12 smelled methane gas and other odors and trash.

13 And this is coming over the -- from over the --  
14 over the edge. Over the ridge line. So I ask -- I want  
15 to ask, you know, the County, and everybody, actually,  
16 that of all these odors that we have, if -- if they're  
17 supposed to fix them, why, since I moved in in 2008, am I  
18 still dealing with it now? If it's part of the contract  
19 or whatever 20, you know, fix the issue, why is it still  
20 here now?

21 I mean, we're at the CAC meeting. I was told  
22 that they're allowed 6,000 tons as of right now, but they  
23 barely take in 3,000. So if you increase it to 12,000,  
24 what about me? I mean, I've been inviting people to come  
25 to my house, live with me.

10-37  
cont'd

1 You know, I deal with this constantly. And I --  
2 I just get -- you know. I'm just -- nobody seems to care.  
3 Or if they care, to me it looks like greed. You know, I  
4 -- if the odors weren't there and the health issues that  
5 usually come with odors, I wouldn't have an issue. If  
6 they can fix the odor issue and they can make it so I'm  
7 not smelling -- you know, I'm not completely against.

8 And the reason why, I just -- it's -- it's --  
9 I've had to alter my lifestyle because of it. My  
10 daughter, my -- and a lot of the community knows this. My  
11 daughter, my wife, and I go to bed super late at night.

12 MS. NATOLI: I need for you to wrap up.

13 AUDIENCE SPEAKER: We wake up early in the  
14 morning. And we do this so we don't have to smell the  
15 landfill. Why should I alter my life -- and other  
16 residents of Val Verde, why should we all have to alter  
17 our lives to benefit somebody else's pocket?

18 And that's what I have to say.

19 MS. NATOLI: Thank you, sir.

20 MR. McCARTHY: And we have Jeremiah Dockrey and  
21 Steve Lee.

22 MS. NATOLI: We may be having a technical  
23 difficulty with the timer; so hold on for a second.

24 AUDIENCE SPEAKER: Can I ask you a quick  
25 question?

10-38

1 MS. NATOLI: You can always ask.

2 AUDIENCE SPEAKER: Erica Larson, she got called  
3 up right before --

4 MS. NATOLI: We'll get to you right after these  
5 two.

6 AUDIENCE SPEAKER: Okay. I'll --

7 MS. NATOLI: And you are?

8 AUDIENCE SPEAKER: Erica Larson.

9 MS. NATOLI: That's okay. We'll get to you.

10 AUDIENCE SPEAKER: My name is Jeremiah Dockray,  
11 and I have a few things to say about the landfill,  
12 obviously.

13 First, for those lack of sufficient mitigation  
14 for catastrophic geological soil failure? This is from  
15 the geology and mineralogy section of the draft report.  
16 It says much of the precipitation at CCL, because of the  
17 steep terrain, surface water tends to be directed to the  
18 south and east of the site by the steep ridge lines at the  
19 site. 3,000 feet away from the site boundary is  
20 seasonally dry and flows to the south to the Santa Clara  
21 River.

22 Past performance of the landfills ability to  
23 withstand a harsh amount of rainfall has been poor. The  
24 grading stabilization of the west boundary is of major  
25 concern as it collapsed in 1982, and was described to the

<p style="text-align: right;">Page 49</p> <p>1 press as, by far, the worst case of erosion we have ever 2 seen by Rob Nelson of the groundwater regulatory unit of 3 the California Water Quality Control Board. 4 At the time of the landslide, water covered the 5 landfill, and regardless of mitigation factors, spilled 6 out of the landfill. 7 With the river in close proximity to the 8 landfill, there were concerns that the immediate overflow 9 would make it into the river. 10 The proposed mitigation measures do not address 11 loss of life, property, environmental pollution, reduced 12 access to Chiquita Canyon Road, details about the future 13 structural integrity of previously graded and adjacent 14 areas. 15 Also another point, seismic induced failure. In 16 the draft report, it says "In our opinion, there is little 17 probability of surface rupture due to faulty (inaudible) 18 occurring offsite. The potential for damage of the 19 geo-synthetic liner is great, and is not clearly addressed 20 in the draft report. 21 In fact, this scenario occurred in 1994 during 22 the Northridge earthquake. Technical observations of the 23 landfill include -- I've lost my page here. I'm sorry. 24 I'm sorry. I feel like I lost all my research here. 25 MS. NATOLI: You could just summarize.</p>	<p style="text-align: right;">Page 51</p> <p>1 AUDIENCE SPEAKER: Thank you. My name is 2 Steven Lee. I live on 30300 Trellis Road in Val Verde, 3 California. I am concerned about the air quality. I 4 walked the neighborhood of Lincoln, and I knocked on 80 5 doors that opened. Out of 80 doors, 74 of them said they 6 could smell the landfill on a regular basis. They told me 7 they do not barbecue in their yards. Their kids do not 8 play in their yards. They're in their homes. They have 9 become prisoners in their own homes. 10 They do not complain, because they say from years 11 and years and years, even when Laidlaw had it, "No, you 12 don't smell the landfill, it's something else." 13 Another concern I have is the sludge taken in 14 2012. Now it is not in the new draft. I don't want 15 sludge. 16 I have to take new medicine just to sleep at 17 night for my asthma because some nights I wake up and I 18 can't breathe. And I don't live by the landfill. I live 19 up a ways in Val Verde, three regions away from the 20 landfill. And it hits my lungs and wakes me up. 21 There have been violations that have been 22 reported. I have something here to read to you that's in 23 your grievance. (Inaudible.) "That Laidlaw, Newhall, and 24 Val Verde Civic Association participate in good faith on a 25 regular basis with the Community Advisory Committee, and</p>	<p>10-38 cont'd</p> <p>10-41</p> <p>10-42</p> <p>10-43</p>
<p style="text-align: right;">Page 50</p> <p>1 AUDIENCE SPEAKER: All right. Damage of the 2 Chiquita Canyon Landfill located approximately 12.2 3 kilometers estimates bedrock of .33 G may be attributable 4 to a variety of procedures of the landfill, the details of 5 the design, and commonly used construction synthetic 6 liners. The damage sustained in the geo-synthetic liner 7 was significant. 8 In addition, it is concerning that the landfill 9 did not have a back up generator for crucial operational 10 equipment. They had no standard safety measures, and 11 adjusted to meet the current needs of the landfill as they 12 occurred. 13 One of the most important assurances that the 14 local residents of this proposal have, that the 15 conditional use permit will comply with the mitigation. 16 MS. NATOLI: Sir, I need for you to wrap up. 17 AUDIENCE SPEAKER: Yeah. One second. 18 The flat disregard of those regulations with 19 little to no County of Los Angeles oversight can be seen 20 with the recent intake of sludge, which has been discussed 21 this evening. 22 MS. NATOLI: Thank you, sir. 23 AUDIENCE SPEAKER: Thank you. 24 MS. NATOLI: Thank you for waiting. Please 25 continue.</p>	<p style="text-align: right;">Page 52</p> <p>1 to assist wherever possible in furthering communication 2 between the community of Val Verde and the landfill, 3 including informational sharing, education, understanding, 4 lawful operations, and response calls. Laidlaw further 5 agrees to forward all notices and reports from or to its 6 regulatory agencies to the Community Advisory Committee 7 within five business days." 8 They were never notified for some of these 9 violations. We found them in the newspaper. I find that 10 offensive. Someone should hold them accountable. And 11 they should be fined. 12 Newhall Ranch is going to put 21,000 homes in 13 front of the landfill on the 126. What will their kids 14 suffer? Will they make it through the night? I say, fix 15 the problems. The landfill should work with us 16 diligently, inform us if there's violations, or put it on 17 trains to Sacramento. Let them have it. 18 Thank you. 19 MS. NATOLI: Thank you, Mr. Lee. 20 Before we get to our next person, I notice that 21 more people have come in. 22 Is there anyone who is planning to testify that 23 has not yet been sworn in? Sir? If there's anyone who's 24 signed up to testify and has not yet been sworn in, would 25 you please stand at this time to be sworn in?</p>	<p>10-44</p>

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1 Thank you.

2 Do you and each of you swear or affirm under

3 penalty of perjury that the testimony you may give in the

4 matter now pending before this hearing examiner shall be

5 the truth, the whole truth, and nothing but the truth?

6 AUDIENCE: I do.

7 MS. NATOLI: All right. Thank you. Please be

8 seated.

9 Proceed.

10 AUDIENCE SPEAKER: Thank you so much. I'm --

11 MS. NATOLI: State your name, please.

12 AUDIENCE SPEAKER: Erica Larson. I'm a resident

13 of Val Verde. I focused on the environmental report,

14 especially on the air quality.

15 And there's a couple of things that -- first one

16 was how they're monitoring, and how they're basing their

17 air quality systems. They're saying that they use a

18 premiere monitoring levels of -- let me find it. CO2.

19 And right now they're using stations based in Burbank and

20 Reseda and one in Santa Clarita. The closest one is seven

21 miles away.

22 I -- the main thing that I want is the monitoring

23 data that comes in from the stations with the CO2 data,

24 which is taken from the stations, and were also taken from

25 station. Hydrogen sulfide is not monitored. So later on

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1 in the report, they stated that their table shows -- and

2 they are actually getting levels of SO2 from the Santa

3 Clarita monitoring station as well as C10. When they are

4 literally just taking that data from the station.

5 So with a little more research, I looked up what

6 are the effects of hydrogen sulfide in the environment.

7 Hydrogen sulfide -- I got this from the EPA itself --

8 hydrogen sulfide gas has a wide range of health effects.

9 In the short term, effects the gas has when it first is

10 first noticeable to some, odors become more intense at

11 under 1.3 parts per million. Above 1.3 parts per million,

12 odors become sweet or sickly sweet. From two to five

13 parts per million, it can cause nausea, tearing of the

14 eyes, headaches, loss of sleep. And in some asthma

15 patients, possible fatigue, loss of appetite, headache and

16 dizziness. (Inaudible) also has similar effects. This is

17 also from the EPA. It has effects such as dizziness,

18 drowsiness, headaches, and giddiness. It is reported to

19 be slightly irritating to the eyes and respiratory tract

20 in humans. This might sound familiar to you guys.

21 These are two chemicals that they are not

22 monitoring. They're also not monitoring methane gas,

23 ammonia, and other landfill gasses; so I feel that if

24 you're going to move on with this expansion -- I really

25 don't want to move on with this expansion, because clearly

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1 things are happening and the citizens are trying to report

2 it and they're being denied. These chemicals must be

3 there in the air.

4 MS. NATOLI: Thank you very much.

5 AUDIENCE SPEAKER: I have a copy I can give you.

6 MS. NATOLI: Thank you, that's always helpful.

7 Mr. Sims, please proceed.

8 AUDIENCE SPEAKER: My name is Percy Sims. I live

9 at 29285 West Lincoln Avenue, Val Verde. I live right

10 next to the dump on Lincoln Avenue. I living there 17

11 years. And I did not approve the expansion.

12 Can I ask you a question? No? Can I ask you a

13 question or no?

14 MS. NATOLI: You can ask a question.

15 AUDIENCE SPEAKER: I have a question and a couple

16 of comments.

17 MS. NATOLI: Your question was?

18 AUDIENCE SPEAKER: Are you guys going to approve

19 the expansion?

20 MS. NATOLI: I don't know what the Regional

21 Planning Commission is going to do. We're not making that

22 decision tonight. The decision is not being made tonight.

23 I'm taking testimony.

24 AUDIENCE SPEAKER: That's what I was wondering.

25 Do we get to vote on that?

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1 MS. NATOLI: You vote by testifying here. Also

2 at the Regional Planning Commission when that hearing is

3 scheduled. That's where they can vote on it. This is to

4 let the Planning Commission know how you feel about it.

5 And I don't know if you were here earlier, but if

6 you're not on the contact list for the Regional Planning

7 Commission hearing on this, please see Ms. Chi after the

8 meeting and give her your details, and she'll put you on

9 the courtesy mailing list so you'll be informed when the

10 Regional Planning Commission meeting occurs.

11 AUDIENCE SPEAKER: My other question is are you

12 -- do any of you guys live in Val Verde?

13 MS. NATOLI: No.

14 AUDIENCE SPEAKER: I've been living there 17

15 years. We've called the dump numerous amount of times,

16 and they don't pay much attention when we say there's a

17 smell. I've been smelling it 17 years. I have a wife and

18 two kids, and I don't know what -- but so I don't know

19 what the condition is. But I'm hoping that we're okay.

20 But no way you say that expanding this dump is

21 going to help our health in any kind of way. So I don't

22 know who's benefiting from this. But we're not benefiting

23 at all. And it's killing our offspring. We've been

24 fighting this for 17 years. And it's terrible and nobody

25 listens to us. They're all big billionaires, and we're

10-45  
cont'd

10-46

10-46  
cont'd

1 small people. But this is wrong, really wrong, that you  
 2 guys are doing this. It's killing us and taking our  
 3 health away.  
 4 MS. NATOLI: Thank you, sir.  
 5 AUDIENCE SPEAKER: Thank you very much.  
 6 MR. McCARTHY: And we have Dr. Faye Snyder and  
 7 Robert Kelly.  
 8 MS. NATOLI: Dr. Snyder? Please proceed,  
 9 Dr. Snyder.  
 10 AUDIENCE SPEAKER: Okay. I don't know if this is  
 11 an exercise in futility, but I --  
 12 MS. NATOLI: I'm sorry. Just for the record for  
 13 the court reporter, state your name for the record.  
 14 AUDIENCE SPEAKER: Okay. My name is Faye Snyder.  
 15 MS. NATOLI: Thank you.  
 16 AUDIENCE SPEAKER: I live in Val Verde. I've  
 17 been living here for 20 years. When we bought our  
 18 property, we were under the impression that the landfill  
 19 was going to be done in -- around this time, that we just  
 20 had to get through this. And in the meantime, I smell bad  
 21 smells. I feel worse every day. My eyes itch so bad  
 22 sometimes I'm worried I'm going to harm them, I swipe them  
 23 so hard. And I feel nausea.  
 24 I don't really trust the system right now because  
 25 we've been promised a lot of things, and a lot of promises

10-47

1 have been broken. From whether or not there would be  
 2 sludge, whether or not there would be water purity tests,  
 3 whether or not there would be air quality tests.  
 4 The -- they were supposedly to test the air. The  
 5 results have never been provided to us.  
 6 When complaints are made, the community usually  
 7 experiences that it's something else is being blamed; so  
 8 our complaints are futile.  
 9 I believe that we need -- somebody has to do this  
 10 job. Somebody has to take the landfills, but I think if  
 11 it stays in one place, then the whole nation is not going  
 12 to understand how serious recycling and all the other  
 13 ~~problems of our waste become.~~  
 14 I don't think it should be just our job. I think  
 15 we did our time. And I think it's time to move on. It  
 16 should be some place else. I think an agreement was made  
 17 with us. The agreement should be kept.  
 18 MS. NATOLI: Thank you, ma'am.  
 19 Mr. Kelly.  
 20 AUDIENCE SPEAKER: My name is Robert Kelly. I'm  
 21 a resident of Castaic for the last 20 years. I served on  
 22 the Castaic Council for eight years, (inaudible) the last  
 23 few years prior to that.  
 24 I sympathize with all the residents here tonight.  
 25 It's a public hearing. Opposition shows up more so than

10-48

10-49

1 anybody favoring projects.  
 2 There's been several projects that have come to  
 3 light in the Castaic area. Whether it's a golf course put  
 4 in or recreational activities, people always come out to  
 5 oppose, no matter what it is. If there was going to be a  
 6 golf course put on a site, there would be people in this  
 7 room right now opposed to it.  
 8 So, obviously, opposition always comes out in  
 9 numbers. I myself have bought and sold houses for over 27  
 10 years in Castaic, and I'm lucky -- fortunate enough not to  
 11 lose money on any single one of them.  
 12 People say their house values have gone down. I  
 13 don't believe that. The dump has been there -- I use the  
 14 word "dump," because that's what people like to refer to  
 15 it as -- 42 years. There isn't a person in this room  
 16 that's lived in the Castaic or Val Verde area for 42 years  
 17 when the landfill was originally approved.  
 18 If the landfill was to go away. Then everybody's  
 19 trash fees would go up, and I can guarantee you'd have the  
 20 same people complaining about their trash fees going up  
 21 and trash getting hauled away.  
 22 People have made comment about this particular  
 23 landfill, that we can dump further up towards Sacramento.  
 24 It's a lot of area between here and Sacramento. The  
 25 transition of the Grapevine is one of the most dangerous

10-49  
cont'd

1 highways there is, especially in Southern California.  
 2 They're even working on not letting trucks  
 3 through there, and rerouting it prior to Santa Clarita and  
 4 Santa Ana valley through the Barstow area.  
 5 I sympathize with the people on their health  
 6 issues, but the dump was here prior to any of them moving  
 7 in.  
 8 People complained about the prison we have in our  
 9 backyard. People complain about the trucking district  
 10 that is the I-5. but it's always typically something that  
 11 was there prior to when they moved in.  
 12 Same thing with the airport. People don't like  
 13 the pollution. I know what. I had an opportunity to move  
 14 anywhere I wanted to move within the Southern California  
 15 area. I chose to continue to live here in Castaic.  
 16 I sympathize, and I think that the noise, the  
 17 issue of traffic, the smell -- all these are being  
 18 mitigated so -- so the residents are happy. And they  
 19 don't need to come up here and complain about their health  
 20 issues. And I sympathize with that.  
 21 Thank you.  
 22 MS. NATOLI: Thank you, sir.  
 23 MR. McCARTHY: And Greg Kimura. Paul Simmonds.  
 24 MS. NATOLI: Mr. Kimura.  
 25 AUDIENCE SPEAKER: Yes. My name is

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10-50	<p>1 Greg Kimura, I live in Val Verde. I'm a member of the 2 Civic Association, and also I'm on the Castaic Town 3 Council as well. 4 I'm going to start by asking if we can get 5 extension on this draft EIR, because there's not enough 6 time for anyone to look over these documents. It's huge. 7 So that's my first comment.</p>	10-58 cont'd	<p>1 plans in place if there's not a controlled fire. And we 2 are talking about methane gas here.</p>
10-51	<p>8 I'm going to make some general comments. My 9 first general comment is the odor problems exist. Ask 10 anyone. And they must be controlled.</p>	10-59	<p>3 Dust control -- no dust should come off-site. 4 It's against the AQMD.</p>
10-52	<p>11 Second general comment, Val Verde and the 12 landfill have contractual agreements. The agreement 13 states the landfill shall close when it reaches 23 million 14 tons or November 24, 2019. I request that the extension 15 be put on hold until the community and landfill clear this 16 up. It's a breach in contract if that expansion goes 17 through.</p>	10-60	<p>5 We also request that a study be made on flies, 6 roaches, rodents, and birds. 7 Litter issues. The litter has come over the 8 hill. With the landfill rising another 143 feet, the 9 landfill does need to --</p>
10-53	<p>18 Third general comment, the landfill violated the 19 agreement regarding sludge. Val Verde requests that this 20 be resolved prior to the extension. Again, this is a 21 breach of contract. 22 And I'm going to go over to the draft EIR. The 23 community of Val Verde requests that no sludge is allowed. 24 Period. 25 The draft EIR says that there is no view from Val</p>	10-61	<p>10 MS. NATOLI: I need you to conclude your 11 comments. 12 AUDIENCE SPEAKER: Okay. Sure. The last thing I 13 wanted to bring up is that the landfill show the community 14 the test results from sampling every half hour, which is a 15 requirement of some water agency. 16 What I'd like to do is thank you for coming out 17 here. We really appreciate it. 18 MS. NATOLI: Thank you Mr. Kimura. And let me 19 repeat, in case you weren't here. The comment period for 20 the draft EIR has been extended to 23 September. 21 AUDIENCE SPEAKER: Thank you. 22 MS. NATOLI: 23 September. 23 AUDIENCE SPEAKER: Thank you. 24 MS. NATOLI: You're welcome. 25 Mr. Simmonds.</p>
10-54	<p>Page 62</p> <p>1 Verde -- or no view of the landfill for Val Verde 2 residents. We don't believe that; so we would like that 3 to be a part of the conditional use permit. That any -- 4 from any of the residences, you will not see the landfill.</p>		<p>Page 64</p> <p>1 AUDIENCE SPEAKER: Thank you. Paul Simmonds. 2 I'm a 22-year resident of Val Verde. And I just want to 3 say I was probably -- the original landfill, I was on the 4 provisional board of CVFC, and elected to the CVFC. I 5 Served one term in the Community Advisory Board. Served 6 with (inaudible) Greg Bradley, Joe Landa (phonetic) and a 7 bunch of other folks. And I'm kind of deeply sad to find 8 out in terms of this agreement trying to be extended. And 9 they're outside of our original agreement. 10 One thing I'd like to make a comment to, the 11 person who made the comment that we'd all be out here if 12 it was a golf course. a we're not talking about a lake or 13 a golf course or recreations here. We're talking about 14 trash. We're talking about potentially hazardous waste. 15 You know, 42 years ago, most people that lived here passed 16 away or were living out of the area. So there -- there's 17 very few people left. These people that are here now, 18 they are concerned citizens. When corporations walk over 19 us and every business got their way, that's not much in 20 the way of community support. 21 What we're talking about is what's good for Val 22 Verde. We're hard pressed to find out if any of these 23 residents in Castaic that are not in Val Verde area, what 24 they would think about putting the landfill in the lower 25 Lagoon lake.</p>
10-55	<p>5 Figure 1511 in the draft EIR is incorrect. There 6 is an overpass between there. On top of that overpass, 7 we'll see the landfill from there.</p>		
10-56	<p>8 Item number 2.3.3, landfill post maintenance must 9 be for 30 years for the entire site. If any area is 10 closed earlier, the maintenance will continue 30 years 11 from the date of the closure of the entire landfill, the 12 last date of which trash comes through the entrance. 13 2.3.3, also, expands the maximum tonnage to 14 12,000 tons a day. That will quadruple the current 3,000 15 tons a day which the landfill's receiving. That's a 16 clarification, and the community of Val Verde is very 17 concerned that that's a lot of trash -- four times as 18 much.</p>	10-62	
10-57	<p>19 Section 2.2.9.6, request to do testing on the 20 community, since there's currently odors that are daily 21 problems for folks in Val Verde. And we also require that 22 landfill -- request of landfill to find a better method of 23 odor control since it's not working well right now.</p>		
10-58	<p>24 Couple of other general statements. Fire -- the 25 draft EIR does not cover fires. We would like emergency</p>		

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10-63	<p>1 I live a quarter mile from the landfill as the</p> <p>2 crow flies. I smell the landfill from time to time. Not</p> <p>3 every day. But these are the people that are living a</p> <p>4 little bit closer than I am.</p> <p>5 But sludge is a big no-no. We absolutely opposed</p> <p>6 that, 100 percent. There was no negotiation in the</p> <p>7 original agreement. And I think there should be no</p> <p>8 negotiation of that going forward.</p>	<p>1 And we all live in Castaic. And the last thing</p> <p>2 we want is for our kids to grow up where there is a large</p> <p>3 landfill. And right now, driving down the 126, you look</p> <p>4 to the right, you can already see that the landfill is</p> <p>5 almost to the top of the mountain. If they were to expand</p> <p>6 this, the -- the amount of land, the devastation just on</p> <p>7 our environment, our health, our air quality -- it's going</p> <p>8 to be devastating.</p>	
10-64	<p>9 Some of the notes that you're looking at,</p> <p>10 hazardous waste. Hazardous waste? Why put it in our</p> <p>11 backyard? That's -- that's reprehensible as far as I'm</p> <p>12 concerned.</p>	<p>9 And if I still lived in the northern half of</p> <p>10 Castaic, what if I lived in Hillcrest? Areas like this</p> <p>11 who aren't affected by the landfill. I now am much closer</p> <p>12 to the landfill than I had ever been. But when I bought</p> <p>13 my house four years ago, I knew that the landfill was</p> <p>14 going to be closing.</p>	10-66 cont'd
10-65	<p>13 It seems to me that with all the missteps here,</p> <p>14 lack of communication from the landfill to the</p> <p>15 communities, the community members of Val Verde having</p> <p>16 some of the gasses that were methane, trash blowing over</p> <p>17 the hill.</p> <p>18 There was very little respect or responsibility</p> <p>19 from the landfill to notify that there was a mishap going</p> <p>20 on. Where was the community advisory committee during all</p> <p>21 of this? There's supposed to be a Newhall land person on</p> <p>22 that, a Person from the landfill, as well as a couple of</p> <p>23 members from the community. Where are they on all of</p> <p>24 this? Where are the air quality monitors that we were</p> <p>25 promised? Where are they? I have not once seen one</p>	<p>15 The other thing that I want to address is my</p> <p>16 generation is not even present here. Nobody reads</p> <p>17 newspapers nowadays. We are on the Internet a lot. There</p> <p>18 is not enough information out there. I think that</p> <p>19 communities out here right now are trying to reach the new</p> <p>20 families. We all have busy lives. We're working hard.</p> <p>21 And no one I met walking down the street knew about this.</p> <p>22 I have a best friend whose family member is very</p> <p>23 involved in the community. She let me know. And I came</p> <p>24 here last minute, canceled all of my plans in order to</p> <p>25 meet here to be able to speak out for my generation and</p>	
	Page 66	Page 68	
	<p>1 brought out and used in the community.</p> <p>2 And as far as -- its far more in contrast, you</p> <p>3 know, if you look at the EIR document that went around for</p> <p>4 the Castaic High School, it was far more extensive and</p> <p>5 involved.</p> <p>6 MS. NATOLI: Mr. Simmonds, I need for you to wrap</p> <p>7 it up.</p> <p>8 AUDIENCE SPEAKER: The residents most impacted by</p> <p>9 the landfill in Val Verde felt their concerns muted.</p>	<p>1 the families that are moving into this community.</p> <p>2 We want to be part of the Santa Clarita Valley</p> <p>3 because it's a great place to raise our kids, but the last</p> <p>4 thing we want is to have a landfill that you can see.</p> <p>5 Even if they say you can't see it, you can.</p> <p>6 There's a lot they don't do. They don't do the</p> <p>7 tests. They don't get the community aware. They don't</p> <p>8 provide the amount of information that they need to.</p> <p>9 And we need to take make a bigger reach out to</p> <p>10 other families. The median -- average age in this</p> <p>11 community is about 26, 27. That's the baby boom of when I</p> <p>12 grew up here, and nobody knows about it. Nobody knows</p> <p>13 that this landfill is going to be increased.</p> <p>14 The fact that we have a lot of people right now</p> <p>15 opposing this does not mean that it's just this small</p> <p>16 group of people. If everybody knew about what was going</p> <p>17 on, I'm sure that you would have a higher number, closer</p> <p>18 to 70 percent of people who would be opposing this</p> <p>19 landfill.</p>	
10-66	<p>10 Thank you.</p> <p>11 MS. NATOLI: Thank you, sir.</p> <p>12 MR. McCARTHY: Jessica Chambers and</p> <p>13 Stephanie Ebia.</p> <p>14 MS. NATOLI: Are you Jessica?</p> <p>15 AUDIENCE SPEAKER: I am Jessica Chambers, and I</p> <p>16 have lived in Castaic my entire life. I was born and</p> <p>17 raised here. And I lived on the northern side of Castaic.</p> <p>18 I want to let you know, I had no idea of the dump</p> <p>19 until I moved to where I recently live in Oak Grove. I'm</p> <p>20 here because I love Castaic, and I believe it's a great</p> <p>21 neighborhood. It's a great area for our children to grow</p> <p>22 up. I just was speaking to -- four of us are best</p> <p>23 friends. The four of us are all pregnant.</p> <p>24 MS. NATOLI: Congratulations.</p> <p>25 AUDIENCE SPEAKER: Thank you.</p>	<p>20 Thank you for your time.</p> <p>21 MS. NATOLI: Thank you.</p> <p>22 AUDIENCE SPEAKER: Hi. My name is</p> <p>23 Stephanie Ebia, and I live in Val Verde. I've been there</p> <p>24 for a number of years.</p> <p>25 My concern is that the landfill was supposed to</p>	10-67

10-67  
cont'd

1 close at the given time in 2019. No other location was  
2 actually sought, to find another site, which really upsets  
3 most of us, because it's -- in here, it states on page 12  
4 of the site to get it ready to close.  
5 So why wasn't this being done previously?  
6 Another thing is that the -- I have a feeling the  
7 expansion is sure to come, regardless of what the  
8 community wants, simply because there is -- because the  
9 EIR shows no significant impact on any of these subjects.  
10 None of them. It all says no significant impact.

11 Therefore, I'm sure it's sure to come.  
12 But what worries me is they did take in sludge.  
13 They were in violation, and there was no penalization for  
14 them. They were not penalized. This is not right. They  
15 had taken it in. We just happened to find that. What  
16 else are they taking in that we don't know? They have not  
17 shown themselves to be trustworthy.

10-68

18 The earthquake dropped a portion of that land on  
19 top of the mountain down, and now they're claiming in this  
20 draft that there's no potential hazard? Hilarious. Quite  
21 disturbing.

10-69

22 The fact that they are already building a new  
23 entrance to take the site -- for the site almost assures  
24 me that this extension will pass regardless of what the  
25 people want.

1 Val Verde does not want the expansion. They were  
2 promised it would be closed in 2019. A new site should  
3 have been looked into a long time ago.

4 That's all I want to say.  
5 MS. NATOLI: Thank you. Thank you very much.  
6 At this time, we're going to take a short,  
7 ten-minute break for the court reporter and for everybody  
8 else. Thank you.  
9 (Brief recess.)

10 MS. NATOLI: All right. Let's -- Mr. McCarthy,  
11 will you please call the next two speakers?

12 Folks, we are reconvening the meeting. Please  
13 take your seats.

14 Mr. McCarthy, please call the next speakers.

15 MR. McCARTHY: Amber Elton and Tim Patterson.  
16 Amber Elton and Tim Patterson.

17 MS. NATOLI: Okay. Let's move on to the next two  
18 and we'll call people again before we close the hearing.

19 MR. McCARTHY: We have Archie Banas and  
20 Emma Brown. Emma Brown.

21 MS. NATOLI: Thank you, sir. Please be seated  
22 and state your name for the record. And begin.

10-70

23 AUDIENCE SPEAKER: My name is Archie Banas from  
24 Val Verde.  
25 And what happened is that, actually, when I was

1 sleeping, it's like I'm a deep sleeper; so no one can  
2 bother me. But one time it happens that I wake up 'cause  
3 someone's choking me. I open my eyes. Nothing there.  
4 But when I went out to my neighborhood -- to my living  
5 room, it's still the same. I went out of my house. I  
6 thought it was just in my house.

7 When I smell something, okay. Now I know what it  
8 is. It's kind of methane with the smell. It's like gas  
9 -- kind of something that you -- you need to look for --  
10 for air when you -- when you are breathing. Right? And  
11 so I just ignore it. I can't sleep. And then after a few  
12 weeks, it happened again. It's like someone's choking me.

10-70  
cont'd

13 I'm -- I was -- I was, like, on a deep sleep like  
14 can't breath, anything. So -- and I really am concerned.  
15 I talk with my neighbor. I ask, "It won't happen again?"  
16 But when I asked them, it's the same thing.

17 I said -- they asked me, "Do you have asthma?"  
18 I said, "I'm -- I don't have asthma. I'm not  
19 athletic. I don't know what's going on."

20 And then someone told me there's a landfill close  
21 to our place. That's what it is. That's why when my  
22 neighbor talked to me I already told him this.

23 And then after a few weeks, it happened to him.  
24 And he told me, "Oh, this is unacceptable. And we should  
25 do something."

1 And he helped us. It's what it is. I hope it  
2 won't happen to other kids or -- the next generation if  
3 they're still going to be opening this thing. I hope if  
4 you guys don't stop it, if they can close it at all, it's  
5 much better for the neighborhood.

6 That's the only thing I can say. Thank you.

7 MS. NATOLI: Thank you.

8 Go ahead, sir. Just state your name for the  
9 record.

10 Have you been sworn in, sir?

11 AUDIENCE SPEAKER: Yes. Tim Patterson. I've  
12 been a resident of Hasley Canyon for 26 years.

13 MS. NATOLI: Sir, could I ask you to speak a  
14 little closer to the mike?

15 AUDIENCE SPEAKER: Oh, I'm sorry.  
16 Tim Patterson, and I've been a resident of Hasley  
17 Canyon for 26 years; so I've seen a lot of change.

18 Tonight, I've been talking to a number of people,  
19 Archie included, and I'm just amazed the -- the firsthand  
20 experience of being able to smell methane gas.

21 I know there's been some accounts in my  
22 neighborhood -- as I'm sure you guys know -- there's  
23 people in the park who smell methane gas; so it seems to  
24 me we're already stuck with the landfill to enforce the  
25 situation, but I don't see how any responsible person can

10-71

	Page 73		Page 75
10-71 conr'd	<p>1 let them expand that when it's already causing health</p> <p>2 issues, pollution, and there's also a serious concern</p> <p>3 about our groundwater if they expand that landfill.</p> <p>4 So I don't know if that was spoken of here</p> <p>5 because of that echo. I don't know if anybody talked</p> <p>6 about that or addressed that, but that's a huge issue.</p> <p>7 And if they get into our aquifer, we've lost</p> <p>8 that. And that's a big part of our water source.</p> <p>9 So now I adamantly oppose the expansion. And I</p> <p>10 also know -- I've seen it via e-mail. Again, the contract</p>		<p>1 MS. CHI: I have business cards in back.</p> <p>2 MS. NATOLI: Iris Chi, who's the planner for this</p> <p>3 project has her business cards at the table. Again, if</p> <p>4 you want to contact Ms. Chi, get on the mailing list, or</p> <p>5 to find out more information, please pick up a card and do</p> <p>6 that.</p> <p>7 The Regional Planning Commission Hearing has not</p> <p>8 been scheduled yet. But it -- it will be at some point.</p> <p>9 It takes some time. We'll need to take all the comments</p> <p>10 from this and all the comments on the draft EIR that come</p> <p>11 in through September 23rd and respond to those comments.</p> <p>12 And that takes a little time for them to get that together</p> <p>13 and get the report together, to submit all this</p> <p>14 information, all the testimony, all of the comments, all</p> <p>15 of the reports to the Regional Planning Commission so that</p> <p>16 they can take an action on the item.</p> <p>17 So that's why the hearing is not set yet in the</p> <p>18 Regional Planning Commission.</p> <p>19 So with that, I'm closing the hearing examiner</p> <p>20 hearing on the draft EIR.</p> <p>21 And, actually, I'm not closing the hearing. The</p> <p>22 hearing needs to be continued to a date not certain. Not</p> <p>23 certain because they don't know when the Regional Planning</p> <p>24 Commission will be hearing the item. Depends on when</p> <p>25 comments of the draft EIR will be complete. And those</p>
10-72	<p>11 was signed by at least four people -- representatives of</p> <p>12 the landfill, that once they reach their capacity, they</p> <p>13 would not expand. So I don't understand how this is --</p> <p>14 why are we even discussing this? But, obviously, they</p> <p>15 are.</p> <p>16 So I just want to go on the record that I am</p> <p>17 adamantly opposed.</p> <p>18 MS. NATOLI: Thank you, sir. Thank you, sir.</p> <p>19 MR. McCARTHY: We have Amber Elton and, once</p> <p>20 again, Emma Brown? Amber Elton and Emma Brown?</p> <p>21 MS. NATOLI: Are there any --</p>		
	<p>22 AUDIENCE SPEAKER: Hello. I'm Amber Elton. I'm</p> <p>23 a civil engineer, and also I work for the -- the City of</p> <p>24 Los Angeles, the Department of Public Works. And I'm also</p> <p>25 a resident of Val Verde. I grew up in Val Verde. I've</p>		
10-73	Page 74		Page 76
	<p>1 lived there my whole life. It's a beautiful place to</p> <p>2 live, great place to raise kids. A landfill is going to</p> <p>3 displace our beautiful community.</p> <p>4 I think that the == landfill is unsafe for us.</p> <p>5 It's too close to our homes. This expansion will bring it</p> <p>6 too close to our homes. It will be bad for our air</p> <p>7 <u>quality, for the groundwater, for the soil. And I think</u></p>		<p>1 reports completed for the Regional Planning Commission; so</p> <p>2 this item is continued to a date not certain.</p> <p>3 And with that, I am moving on to Part III on the</p> <p>4 agenda. Public comment.</p> <p>5 And we have one speaker card -- is that correct?</p> <p>6 -- for public comment?</p> <p>7 MR. McCARTHY: Yes. Lynne Plambeck.</p>
10-74	<p>8 the landfill on their original agreement would close it.</p> <p>9 I'm very opposed to this landfill, and I'd like to see it</p> <p>10 closed.</p> <p>11 Thank you.</p> <p>12 MS. NATOLI: Thank you.</p> <p>13 MR. McCARTHY: And we have one left for public</p> <p>14 comment.</p> <p>15 MS. NATOLI: Just one more time. If you could</p> <p>16 call the other speaker. Hold on. Emma Brown once more?</p> <p>17 MR. McCARTHY: Emma Brown once again?</p> <p>18 MS. NATOLI: Okay. With that we've completed</p> <p>19 testimony on agenda item Number 2.</p> <p>20 I wanted to say it again, this is not your last</p> <p>21 opportunity to comment on the Chiquita Canyon Landfill</p> <p>22 Master Plan Revision Draft EIR, or the project itself.</p> <p>23 Comments on the draft EIR are being taken through</p> <p>24 September 23rd, and the contact information is on the --</p> <p>25 how can they get in touch --</p>		<p>8 AUDIENCE SPEAKER: I'm Lynne Plambeck. I'm the</p> <p>9 president of the Santa Clarita organization for land use.</p> <p>10 It's an environmental organization that's been active in</p> <p>11 the Santa Clarita Valley for 26 years. And I would like</p> <p>12 to make general comments on the hearing officer process</p> <p>13 with these large --</p> <p>14 MS. NATOLI: The hearing examiner process?</p> <p>15 AUDIENCE SPEAKER: The hearing examiner process</p> <p>16 on these large meetings.</p> <p>17 I know myself, personally, our organization, and</p> <p>18 I'm sure the community is very grateful to you for -- and</p> <p>19 to the County for conducting a hearing on this and for the</p> <p>20 time that you've all devoted to coming to this area.</p> <p>21 But it is in our -- our -- we have concerns that</p> <p>22 this -- there's a failure that we don't have a planning</p> <p>23 commissioner at these hearings.</p> <p>24 We have this large project. I guess it's the way</p> <p>25 of large projects. It happened for the Disney project.</p>

10-75

10-75  
cont'd

1 Hopefully, it's not going to be handled this way for  
 2 Newhall Ranch. But it's very concerning to us that the  
 3 commissioners will not actually read the transcripts.  
 4 They have a tremendous amount of reading to do  
 5 already, and it's important for them to be able to hear  
 6 the public, to be able to hear the community come and say,  
 7 you know, "We have smells," and to see body language, and  
 8 make their judgments accordingly.  
 9 They didn't do that for the Disney project. And  
 10 I think that that was a real failure in that process.  
 11 And I understand that the County is trying to  
 12 streamline and trying to make it convenient. But when we  
 13 have Hasley Canyon people out here, you can have three  
 14 commissioners. You have a majority of the commissioners.  
 15 And then they can actually hear and see the public.  
 16 So I would like, again, to register my concern  
 17 that we don't even have the commissioner that is  
 18 representing this area here at this hearing. And that I  
 19 don't know how we are ensuring that the public is actually  
 20 being heard by the commission who are, in fact, the  
 21 decision makers.  
 22 Again, I really appreciate your time. I  
 23 appreciate the staff coming out here. I understand it's a  
 24 hearing officer -- I don't know what your proper title is.  
 25 Coming out -- coming all the way from the west side. But

1 you are not the decision makers. And I think that this  
 2 process is really flawed in that communities should be  
 3 heard by the people who will be voting on the project.  
 4 Thank you so much.  
 5 MS. NATOLI: Thank you very much. All right. We  
 6 have no more public comment forms.  
 7 With that, the hearing examiner meeting for July  
 8 31, 2014, is adjourned.  
 9 Thank you.  
 10 (The meeting was adjourned at 8:18 p.m.)  
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1 CERTIFICATE  
 2  
 3 I, Heatherlynn Gonzalez, a Certified Shorthand  
 4 Reporter for the State of California, License Number  
 5 13646, do hereby attest that:  
 6 The preceding is a true and accurate  
 7 transcription to the best of my ability of the meeting of  
 8 the organization named herein;  
 9 The meeting was taken down in shorthand and  
 10 transcribed into English under my supervision and  
 11 authority;  
 12 I have no interest, financial or otherwise, in  
 13 any of the parties, issues, or individuals who are  
 14 involved in this organization.  
 15 Attested to on this \_\_\_\_\_ day of \_\_\_\_\_,  
 16 2014.  
 17  
 18  
 19 \_\_\_\_\_  
 20 CERTIFIED SHORTHAND REPORTER  
 21 FOR THE STATE OF CALIFORNIA  
 22  
 23  
 24  
 25

# Letter No. 10

Hearing Examiner Meeting  
Thursday, July 31, 2014

Meeting of Los Angeles County  
Department of Regional Planning  
31320 North Castaic Road  
Castaic, CA 91384

## Response to Comment No. 10-1

Comment acknowledged.

## Response to Comment No. 10-2

Comment acknowledged.

## Response to Comment No. 10-3

Please see Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health.

## Response to Comment No. 10-4

Please see Topical Response #26 for a discussion of Treated Auto Shredder Waste and Shredded Tires.

## Response to Comment No. 10-5

Please see Topical Response #27 for a discussion of Visual Resources.

## Response to Comment No. 10-6

Please see Topical Response #11 for a discussion of Geologic Hazards.

## Response to Comment No. 10-7

Please see Topical Response #30 for a discussion of Water Quality.

## Response to Comment No. 10-8

Comment noted. Please also see Topical Response #21, Public Health.

## Response to Comment No. 10-9

Please see Topical Response #23, Public Services and Utilities, for a discussion of the Water Supply Assessment.

## Response to Comment No. 10-10

Water quality reports are currently, and will continue to be, disclosed. Water quality monitoring has been conducted at CCL since January 1986. The current program requires monitoring of the groundwater and the unsaturated (vadose) zone, monitoring for leachate production, monitoring of surface water, and monitoring of the incoming waste stream. The monitoring program is conducted in accordance with the current Monitoring and Reporting Program (MRP) contained in Regional Water

Quality Control Board (RWQCB) Order No. 98-086. Quarterly monitoring is required by the current waste discharge requirements and MRP for the landfill, and data are reported in semiannual and annual reports submitted to RWQCB.

#### Response to Comment No. 10-11

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance.

#### Response to Comment No. 10-12

Notifications were sent to all property owners within a 1,000-foot radius of the landfill, according to County requirements. Please see Topical Response #22, Public Scoping and Public Outreach.

#### Response to Comment No. 10-13

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

#### Response to Comment No. 10-14

Please see Topical Response #17, Odor.

#### Response to Comment No. 10-15

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance and Topical Response #29a for a discussion of Wastes to be Disposed.

#### Response to Comment No. 10-16

Please see Topical Response #5 for a discussion of the existing Conditional Use Permit and Community Agreement, as well as Topical Response #20 for a discussion of Property Values.

#### Response to Comment No. 10-17

Please see Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health.

#### Response to Comment No. 10-18

Comment noted.

#### Response to Comment No. 10-19

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

#### Response to Comment No. 10-20

Comment acknowledged.

#### Response to Comment No. 10-21

Please see Topical Response #24, Source of Waste/Importation of Out-of-County Waste.

#### Response to Comment No. 10-22

A detailed description of potential air quality impacts as a result of the Proposed Project is included in revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR.

### Response to Comment No. 10-23

Please see Topical Response #30 for a discussion of Water Quality.

### Response to Comment No. 10-24

See Topical Response #13 for a discussion of the Household Hazardous Waste Facility.

### Response to Comment No. 10-25

Please see Topical Response #24, Source of Waste/Importation of Out-of-County Waste.

### Response to Comment No. 10-26

Please see Topical Response #19 for a discussion of Project Need.

### Response to Comment No. 10-27

Please see Topical Response #17 for a discussion of Odor.

### Response to Comment No. 10-28

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

### Response to Comment No. 10-29

Please see Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health.

### Response to Comment No. 10-30

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance.

### Response to Comment No. 10-31

Please see Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health.

### Response to Comment No. 10-32

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance, Topical Response #29a for a discussion of Wastes to be Disposed at CCL, and Topical Response #29b for a discussion of the Waste Screening and Acceptance Program.

Regarding samples, please see Topical Response #10 for a discussion of Environmental Monitoring.

### Response to Comment No. 10-33

Please see Topical Response #27, Visual Resources. Please also see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of fugitive dust and odor, including current and future sources and management strategies.

## Response to Comment No. 10-34

Please see Topical Response #11 for a discussion of Geologic Hazards as well as Topical Response #14 for a discussion of the Landfill Liner System.

With regard to the potential for liner leaks, please see Topical Response #10 for a discussion of Environmental Monitoring, including groundwater monitoring.

## Response to Comment No. 10-35

The operational procedures established at the landfill do not promote increases in insect and rodent populations. Each day, cover is placed on the waste to control odors, birds, vectors, flies, and other insects. See Final EIR Section 2.2.8.8, Nuisance and Health Hazard Monitoring, for a discussion of vectors and operational procedures conducted at CCL that serve to control vectors. Final EIR Section 1.9.1, Regulatory Compliance - Framework for Class III Landfills, states that local regulatory enforcement of CCL is performed by the Los Angeles County Department of Public Health, also known as the Local Enforcement Agency (LEA). Regular inspections of CCL are conducted by the LEA inspector. Part of the inspection process evaluates the landfill's ability to control vectors, such as insects and rodents. No violation notices related to vector control at CCL have ever been filed by the LEA.

## Response to Comment No. 10-36

Issues related to noise are addressed in Original Draft EIR Chapter 13, Noise. Operations-generated noise at the landfill does not exceed the County's established noise thresholds. Please also see Topical Response #16, Noise. Please also see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of fugitive dust and odor, including current and future sources and management strategies.

## Response to Comment No. 10-37

Please see Topical Response #17, Odor, and Topical Response #21, Public Health.

## Response to Comment No. 10-38

Please see Topical Response #11 for a discussion of Geologic Hazards.

The project does not result in reduced access to Chiquito Canyon Road.

## Response to Comment No. 10-39

Please see Topical Response #11 for a discussion of Geologic Hazards as well as Topical Response #14 for a discussion of the Landfill Liner System.

With regard to the potential for liner leaks, please see Topical Response #10 for a discussion of Environmental Monitoring, including groundwater monitoring.

## Response to Comment No. 10-40

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance.

## Response to Comment No. 10-41

Please see Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health.

### Response to Comment No. 10-42

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance. Also see Topical Response #29a for a discussion of Wastes to be Disposed.

### Response to Comment No. 10-43

Please see Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health.

### Response to Comment No. 10-44

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance. Also see Topical Response #29a for a discussion of Wastes to be Disposed.

### Response to Comment No. 10-45

Please see Topical Response #10, Environmental Monitoring, and Topical Response #1, Air Quality.

### Response to Comment No. 10-46

Please see Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health.

### Response to Comment No. 10-47

Please see Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health.

### Response to Comment No. 10-48

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

### Response to Comment No. 10-49

Comment acknowledged.

### Response to Comment No. 10-50

The public comment period was extended by 30 days, ending on September 23, 2014. The public comment period was subsequently extended by an additional 30 days, with a final end date of October 23, 2014.

### Response to Comment No. 10-51

Please see Topical Response #17, Odor.

### Response to Comment No. 10-52

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

### Response to Comment No. 10-53

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance.

## Response to Comment No. 10-54

The EIR does not indicate the presence of any significant impact related to visual resources that would lead to this type of permit condition.

## Response to Comment No. 10-55

Please see Topical Response #27 for a discussion of Visual Resources.

## Response to Comment No. 10-56

A final post-closure maintenance plan will be submitted to and approved by RWQCB, the LEA, and California Department of Resources Recycling and Recovery (CalRecycle). The final post-closure maintenance plan will describe post-closure maintenance activities, including environmental monitoring; final cover inspection and maintenance procedures; drainage system inspection and maintenance procedures; vegetation inspection and maintenance procedures; final grading inspection and maintenance procedures; and proposed end use. The final post-closure maintenance plan also includes persons responsible for post-closure maintenance and a post-closure maintenance schedule.

The new maximum daily tonnage will increase from 6,000 daily tons to up to 12,000 daily tons.

## Response to Comment No. 10-57

Please see Topical Response #1, Air Quality, Topical Response #10, Environmental Monitoring, and Topical Response #17, Odor.

## Response to Comment No. 10-58

Please see Topical Response #23, Public Services and Utilities, for a discussion of fire control.

## Response to Comment No. 10-59

Please see Final EIR Chapter 11, Air Quality, for a discussion of dust control best management practices.

## Response to Comment No. 10-60

The operational procedures established at the landfill do not promote increases in insect and rodent populations. Each day, cover is placed on the waste to control odors, birds, vectors, flies, and other insects. See Final EIR Section 2.2.8.8, Nuisance and Health Hazard Monitoring, for a discussion of vectors and operational procedures conducted at CCL that serve to control vectors. Final EIR 1.9.1, Regulatory Compliance - Framework for Class III Landfills, states that local regulatory enforcement of CCL is performed by the Los Angeles County Department of Public Health, also known as the LEA. Regular inspections of CCL are conducted by the LEA inspector. Part of the inspection process evaluates the landfill's ability to control vectors, such as insects and rodents. No violation notices related to vector control at CCL have ever been filed by the LEA. Based on the above, the County has found no basis for requiring a study of flies, roaches, rodents, and birds.

Litter at CCL is also addressed in Final EIR Section 2.2.8.8, Nuisance and Health Hazard Monitoring.

## Response to Comment No. 10-61

Please see Topical Response #10 for a discussion of Environmental Monitoring.

## Response to Comment No. 10-62

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

### Response to Comment No. 10-63

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance. Also see Topical Response #29a for a discussion of Wastes to be Disposed.

### Response to Comment No. 10-64

See Topical Response #13 for a discussion of the Household Hazardous Waste Facility. Please also see Topical Response #29a for a discussion of Wastes to be Disposed and Topical Response #29b for a discussion of the Waste Screening and Acceptance Program.

### Response to Comment No. 10-65

Please see Topical Response #22, Public Scoping and Public Outreach.

### Response to Comment No. 10-66

Please see Topical Response #10, Environmental Monitoring, and Topical Response #22, Public Scoping and Public Outreach.

### Response to Comment No. 10-67

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

### Response to Comment No. 10-68

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance. Also see Topical Response #29a for a discussion of Wastes to be Disposed.

### Response to Comment No. 10-69

Please see Topical Response #11 for a discussion of Geologic Hazards.

### Response to Comment No. 10-70

Please see Topical Response #17, Odor, and Topical Response #21, Public Health.

### Response to Comment No. 10-71

Please see Topical Response #21, Public Health, and Topical Response #30, Water Quality.

### Response to Comment No. 10-72

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

### Response to Comment No. 10-73

Please see Topical Response #1, Air Quality, and Topical Response #30, Water Quality.

### Response to Comment No. 10-74

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

## Response to Comment No. 10-75

Comment noted. The Hearing Examiner meeting followed the requirements established by Los Angeles County for a meeting of this type.

Iris Chi

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**From:** Caitlin Gulley [cgulley@tataviam-nsn.us]  
**Sent:** Friday, August 01, 2014 3:07 PM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon Landfill EIR Comment/Request

Good afternoon,

The Fernandeno Tataviam Band of Mission Indians (Tataviam) would like to inform you that Tataviam have entered into an agreement with Chiquita Canyon, LLC (CCL) on the matter of the Chiquita Canyon Landfill Project (CCLP). Tataviam are providing CCL with construction monitoring and cultural resource oversight services for the CCLP.

We request that the Environmental Impact Report for the CCLP include that Tataviam has the right to place monitors on the removal or disturbance of any oak trees effect by CCLP, with the exception of "landscape" oak trees.

11-1

Thank you,

**Caitlin Gulley**

Tribal Historic and Cultural Preservation

[cgulley@tataviam.nsn-us](mailto:cgulley@tataviam.nsn-us)

**Fernandeno Tataviam Band of Mission Indians**

1019 Second Street, Suite 1  
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Email: [administration@tataviam-nsn.us](mailto:administration@tataviam-nsn.us)

Website: <http://www.tataviam-nsn.us>

*This e-mail message is confidential, intended only for the named recipient(s) above and may contain information that is privileged, attorney work product or exempt from disclosure under applicable law. If you have received this message in error, or are not the named recipient(s), please immediately notify the sender by reply-email and delete this e-mail from your computer. Also, neither this message nor any attachments to it constitute an offer of any kind, and to the extent this communication, or any other communication in connection herewith, is in the context of negotiations regarding a possible agreement or transaction, in no event shall Fernandeno Tataviam Band of Mission Indians be bound to anything without a final, signed contract (it being understood that in all cases Fernandeno Tataviam Band of Mission Indians shall have the absolute right to terminate any discussions or negotiations at any time and for any reason without any liability whatsoever). Thank you.*

## Letter No. 11

Caitlin Gulley  
Tribal Historic and Cultural Preservation  
Fernandeño Tataviam  
Band of Mission Indians  
1019 Second Street, Suite 1  
San Fernando, CA 91340

### Response to Comment No. 11-1

Text has been added to Mitigation Measure BR-15 (impacts to qualifying oak trees), indicating that Tataviam have the right to provide monitors during the removal or disturbance of oak trees (not including "landscape oaks" at CCL).

Iris Chi

From: Howsemom [howsemom@sbcglobal.net]  
Sent: Friday, August 01, 2014 7:26 AM  
To: Iris Chi  
Subject: Chiquita Landfill Expansi comments

Dear County of LA Planner, Iris Chi,

I was pleased to meet you last night and wish to submit my comments in writing concerning the Landfill Expansion. My trust in you is all comments and concerns are taken seriously and not merely recorded. My fear is our comments mean nothing other than an opportunity to express them.

I would like to see better communication with the Val Verde residents on serious issues. Please add me to your information mailing.

My comment are:

No landfill should ever be placed near a residential area. The community of Val Verde was here before the landfill, in my opinion it should have never been approved in the beginning. We chose to build and live in Val Verde knowing the landfill was next door. Why? Because we were told there was a written agreement between ValVerde and the Landfill that it will close. Yes, it does smell where we live and we have not complained much until now because we honestly believed it was temporary issue. My son and my grandchildren live on Lincoln, they deal with even more odors than us.

12-1

There are concerns with health issues the landfill could be causing, testing the air quality is a must for our peace of mind. We need confidence that we are being told the truth. Even if the air is proven safe, no one should have to live with the odor. The rep with the landfill did tell us trash is going to smell, it's a fact. The message came across is so just accept it.

12-2

It would like to ask why morally and legally, why the county would not honor a signed written agreement with the landfill to not expand? The residents of Val Verde deserve a truthful response to this question from the County.

12-1

The money given to the community by the landfill does not directly benefit us personally. It's my opinion no amount of money given is worth living with the smell and potential health risks for those of us living the closest. People who aren't physically affected enjoy the benefit of the funds therefore could be in favor of this expand for their own personal gain, is this fair to us who live next to it?

12-3

If the county chooses approve this project then the safety of the people in Val Verde should be a priority with strong and clear guidelines for our quality of life.

I am against the expansion and trust the county has heard and listened to our comments and will not approve this project.

Respectively submitted,  
Kathy Howse  
30014 Buchanan Way  
Val Verde, CA 91384

Sent from my iPad

## Letter No. 12

Kathy Howse  
30014 Buchanan Way  
Val Verde, CA 91384

### Response to Comment No. 12-1

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

### Response to Comment No. 12-2

Please see Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health.

### Response to Comment No. 12-3

Comment noted.

Iris Chi

---

**From:** David Sage [sagefamily@sbcglobal.net]  
**Sent:** Friday, August 01, 2014 7:55 AM  
**To:** Iris Chi  
**Subject:** 1997 CUP for Chiquita Canyon Landfill and Statement of Agreements

Hello Iris,

I was not able to make it to the meeting last night, but had my comments read by my neighbors. I heard from many people that the meeting was successful and they were pleased with the County's response and attention to their concerns.

One of the local residents, Kathy Howse, was confused about something that you said to her, to the effect of "the county is not bound by the signed agreement between the landfill and Val Verde because it's not in the CUP."

In any case, she asked if I could send an email to you, to clarify.

There is a provision in the listed conditions in the 1997 CUP (article 44) that "permittee shall comply with the Statement of Agreements and Understandings it entered into with certain community representatives of Feb 21 and 24, 1997 as that agreement has been amended and as it may be amended according to its terms. County enforcement of this condition shall be limited to a revocation or modification proceeding under County Code Section 22.56.1780 et seq., which may be commenced only in the event that a court or other decision maker of competent jurisdiction determines that the permittee has breached its obligations under the Statement of Agreements and Understandings." The Statement of Agreements and Understandings is therefore a part of the CUP.

13-1

Thanks for your attention to this matter.

Sincerely,  
Sara Sage

# Letter No. 13

Sara Sage

## Response to Comment No. 13-1

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

Vanessa Brookman

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**From:** Greg Kimura [gregkimura3@sbcglobal.net]  
**Sent:** Monday, August 11, 2014 11:26 PM  
**To:** info@valverdecac.org  
**Subject:** Request to look into illegal sludge dumped at Chiquita Canyon Landfill

Dear VWCAC Board,

The Chiquita Canyon Landfill is operating under a conditional use permit from LA County Dept of Regional Planning. This document states that the landfill is not allowed to accept sludge. The landfill has bid on taking in sludge from municipalities and has even accepted sludge, which was delivered to the landfill. I have a couple things I would like some information from you, the liason organization.

1. Are you aware of this?
2. If so, what have you done?
3. If not, what can you do?
4. Do you consider it a violation of the CUP?
5. In your eyes it still a violation if they change the invoice to no longer have the word "sludge"?
6. The landfill has claimed that there are many definitions of the word sludge, when it's regarding landfills. Do you agree?
7. What is suppose to happen to the sludge? Shouldn't it be removed and sent to a landfill that is allowed to accept it?
8. What can you do to insure this happens?

14-1

I have sent a blind CC to my VVCA Board, Landfill Committee and the CATC. I will send them your response when I receive it.

Thank you.

Greg

# Letter No. 14

Greg Kimura c/o Val Verde Community Advisory Committee

## Response to Comment No. 14-1

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance. Also see Topical Response #29a for a discussion of Wastes to be Disposed.

**Vanessa Brookman**

---

**From:** Greg Kimura [gregkimura3@sbcglobal.net]  
**Sent:** Monday, August 11, 2014 11:44 PM  
**To:** info@valverdecac.org  
**Subject:** Leachate tests

Dear WVCAC Board,

I would like you to look into the leachate tests at Chiquita Canyon Landfill. Since the liner is suppose to contain all the trash brought into the landfill, the liquid which flows to the bottom gives you an idea of what has been taken in. Testing this leachate will let the community know what was brought in and what can potentially leave the landfill as gases, odors, particulate or solid waste (materials blowing). I believe the leachate is currently tested and if so, can you provide the results of the test. If not how can we get this material tested?

15-1

Since the Draft EIR comment period ends in mid/late September, 2014, I request that you provide this information to me by the end of this month. I have blind cc'd the WVCA Board, WVCA Landfill Committee and CATC. I will wait for your response.

Thank you.

Greg

# Letter No. 15

Greg Kimura c/o Val Verde Community Advisory Committee

## Response to Comment No. 15-1

Please see Topical Response #10, Environmental Monitoring, for a discussion of leachate monitoring.

Vanessa Brookman

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**From:** Greg Kimura [gregkimura3@sbcglobal.net]  
**Sent:** Tuesday, August 12, 2014 12:07 AM  
**To:** info@valverdecac.org  
**Subject:** Odor Complaints

Dear WVCAC Board,

A few months ago at your April WVCAC meeting, you had two representatives from the SCAQMD at your meeting. One of the reps made a statement regarding when the SCAQMD will respond to odor complaints. The rep said that six verified complaints in a one day period would constitute a nuisance. The rep also stated that the so called "5 calls in 30 minutes" does not exist and they will come out typically after 3 calls in one hour.

At meetings prior to this, you told the residents to call the landfill first, then call the WVCAC and finally the SCAQMD. You also told residents about the "5 calls in 30 minutes" rule with the SCAQMD, which we now know is not true. Many residents gave up calling to complain about odors, because they felt that "5 calls in 30 minutes" was far too restrictive. Can you tell me where this "5 calls in 30 minutes" rule came from and why you had not verified this with the SCAQMD, prior to the April 2014 meeting?

Residents also are now aware that the first call should be to the SCAQMD, then they can call the landfill and WVCAC if they choose to. The SCAQMD has noticed a significant increase in odor complaints since this information has been made public to a large part of the community. I am not sure if you're aware, but volunteers walked the most affected areas of Val Verde and spoke to residents about the odor complaint process. About 6 out of 80 claimed that they don't think the odors are a problem. The others complained about the odor, but either gave up calling or didn't know the process. So now they are calling and the claims by the landfill are false; the SCAQMD has verified the odor as landfill generated.

As a Board, you now know that there is an odor problem in Val Verde. What can you do about it? Since you are the liason to the Dept of Regional Planning, I am requesting that you send them a letter stating that the community is having odor problems which come from the landfill.

If you would like to verify this yourself, I invite you to visit the corner where Lincoln turns toward Chiquito Canyon. Your visit should be after 9:30 pm on an evening where the daytime temp was at least 95 degrees. There are two houses on the right, just before you turn the corner. Stand in front of either house for 10-15 minutes. You will smell the landfill (sometimes not too strong, but definitely there) or you may even get nauseous.

Again, this will be blind cc'd to the WVCA Board, WVCA Landfill Committee and CATC. Your response will be forwarded to them as well.

Thank you.

Greg

16-1

# Letter No. 16

Greg Kimura c/o Val Verde Community Advisory Committee

## Response to Comment No. 16-1

The revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR includes a discussion of odor complaints as verified by the South Coast Air Quality Management District according to their protocols. Please also see Topical Response #17, Odor.

**Vanessa Brookman**

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**From:** Greg Kimura [gregkimura3@sbcglobal.net]  
**Sent:** Tuesday, August 12, 2014 12:33 AM  
**To:** info@valverdecac.org  
**Subject:** Auto Shred testing  
  
**Categories:** wrk

Dear VVCAC Board,

Per the State of California, California Regional Water Quality Control Board, Los Angeles Region, Order # 98-086, treated auto shredder waste must be sampled and tested per the requirements on Page T-7. Between 2007 to 2009, SA Recycling delivered tainted material to landfills, including Chiquita Canyon Landfill. Based on the sampling and testing required per Order #98-086, I am requesting the following:

1. You have the landfill provide the dates and times the samples were taken and the test results of those samples.
2. If the samples are shown to contain toxic materials, how can we get these out of the landfill?
3. As a Board, were you aware that Chiquita Canyon took in this waste material?
4. If you were not aware of it, what will you do in the future to insure that you are alerted to hazardous situations?
5. If tainted material was brought into the landfill, can you give me the dates and amounts?
6. If the landfill did not take adequate samples, why was this unknown to the Board?
7. What can be done in the future to make sure you are aware of incidents like this?

17-1

I am sending a copy of this blind cc to the WVCA Board, WVCA Landfill Committee and the CATC. I will send them your reply when I receive it.

I also ask you to expedite the answers, as this information will be used to comment on the Draft EIR.

Thank you.

Greg

# Letter No. 17

Greg Kimura c/o Val Verde Community Advisory Committee

## Response to Comment No. 17-1

Please see Topical Response #26 for a discussion of Treated Auto Shredder Waste and Shredded Tires.

Vanessa Brookman

From: Greg Kimura [gregkimura3@sbcglobal.net]  
Sent: Tuesday, August 12, 2014 12:51 AM  
To: info@valverdecac.org  
Subject: Liner torn at Chiquita Canyon Landfill

Dear VVCAC Board,

I have been asked by residents of Val Verde to get the following information from your Board. Since you are the liason between the community and the landfill, these questions are directed toward your Board.

1. Back in the 1994 Northridge Earthquake, the liner at the Chiquita Canyon Landfill had huge tears. [http://repository.asu.edu/attachments/57017/content/Arab\\_asu\\_0010E\\_10955.pdf](http://repository.asu.edu/attachments/57017/content/Arab_asu_0010E_10955.pdf)
2. The liner is only 60 mils thick. In some article, I read that the liner is 60 mm thick, which would be great. I found out it's only 60 mil or about the thickness of 60 outdoor trash bags. How can a material so thin with so much trash above hold all the forces from an earthquake?
3. Since the liner tore in the 1994 Northridge earthquake, we can assume that tears will occur with the next earthquake of this size. And the landfill wants to increase the height of trash by 143 feet?
4. What does your research tell you?
5. If this is a problem, what can be done to the existing liner under the landfill?
6. How does the landfill repair a tear that is under hundreds of feet of trash?
7. What is the cost to repair a tear hundreds of feet below trash?
8. Is there enough emergency funds to repair multiple tears?
9. Is there a stronger product, or a thicker version?

18-1

I have sent this blind cc to the WVCA Board, WVCA Landfill Committee and CATC Board. I will send them your response as soon as I receive it.

I ask that you expedite this, since your answer will determine comments to the Draft EIR. The comment period ends mid/late September 2014, so I request that you respond to me by the end of August, 2014.

Thank you.

Greg

# Letter No. 18

Greg Kimura c/o Val Verde Community Advisory Committee

## Response to Comment No. 18-1

Please see Topical Response #11 for a discussion of Geologic Hazards, as well as Topical Response #14 for a discussion of the Landfill Liner System.

With regard to the potential for liner leaks, please see Topical Response #10 for a discussion of Environmental Monitoring, including groundwater monitoring.

Vanessa Brookman

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**From:** Greg Kimura [gregkimura3@sbcglobal.net]  
**Sent:** Tuesday, August 12, 2014 1:02 AM  
**To:** info@valverdecac.org  
**Subject:** Odor control equipment at Sunshine Canyon Landfill

**Categories:** wrk

Dear WVCAC Board,

I was told by a resident of Val Verde that the Sunshine Canyon Landfill was recently required to install odor abatement equipment at the landfill. This was a court order, which stems from odor complaints from the residents. Since the residents of Val Verde are currently having odor issues from Chiquita Canyon Landfill, I am asking you to find out the following and take action:

1. What type of odor control equipment was Sunshine Canyon Landfill required to install?
2. How effective is this equipment?
3. Since the community has odor problems from the landfill, will the landfill install this equipment?
4. Is there a better way to eliminate the landfill odors, short of closing the site down?
5. As liason to the Department of Regional Planning, I want you to write a letter stating that the community has been complaining about odors coming from the landfill and the community is asking for improved odor control equipment.

19-1

I am blind cc'ing this to the WVCA Board, WVCA Landfill Committee and CATC. I will send your response as soon as I receive it.

Thank you.

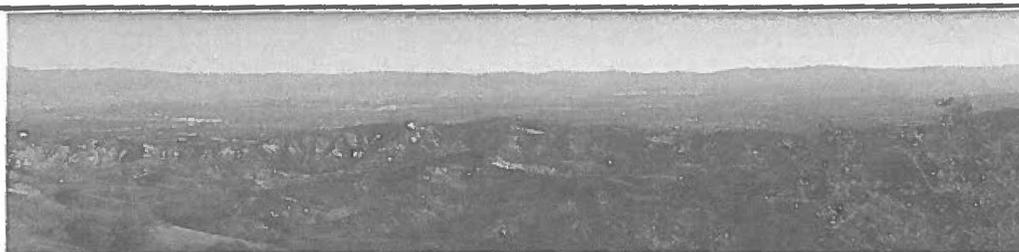
Greg

# Letter No. 19

Greg Kimura c/o Val Verde Community Advisory Committee

Response to Comment No. 19-1

See Topical Response #17, Odor.



Val Verde Community Advisory Committee

August 12, 2014

Department of Regional Planning  
Richard J. Bruckner, Director  
320 W. Temple Street, Room 1390  
Los Angeles, Ca 90012

RE: COMMUNITY QUESTIONS AND CONCERNS FROM RESIDENTS IN VAL VERDE  
VIA: USPS and/or Email

Dear Mr. Bruckner;

Enclosed, please find eight (8) emails, from Mr. Greg Kimura sent to the Val Verde Community Advisory Committee.

We would like Regional Planning to address his concerns as the VV CAC is not equipped nor tasked with providing these types of answers. Can you also make sure the concerns and questions are submitted to the Chiquita Canyon landfill DEIR process for inclusion in the EIR.

Please respond directly to Mr. Kimura regarding his questions and concerns, also keeping the \*cc list\* intact.

Much Appreciation.

Sincerely,

Vanessa Brookman  
President  
Val Verde Community Advisory Committee.  
[VBrookman@sbcglobal.net](mailto:VBrookman@sbcglobal.net)

cc:

- Val Verde Community Advisory Committee
- Randy Winter - [rg@rgwinter.com](mailto:rg@rgwinter.com)
- Derek Dahl - [ddahl1981@yahoo.com](mailto:ddahl1981@yahoo.com)
- Vince Cantella - [VC1949guard-xtra@yahoo.com](mailto:VC1949guard-xtra@yahoo.com)
- Darcy Stinson - [D.Stinson@ValVerdeCAC.org](mailto:D.Stinson@ValVerdeCAC.org)
- Marlee Lauffer - [Mlauffer@newhall.com](mailto:Mlauffer@newhall.com)
- Lori Bennett - [lbennett956@gmail.com](mailto:lbennett956@gmail.com)

RECEIVED  
AUG 18 2014  
BY:

Val Verde Community Advisory Committee • P.O. Box 800034 • Santa Clarita, CA 91380



## Val Verde Community Advisory Committee

### **Castaic Area Town Council**

Flo Lawrence - [fflawrence@castaicareatowncouncil.org](mailto:fflawrence@castaicareatowncouncil.org)

John Kunak - [johnkunak@castaicareatowncouncil.org](mailto:johnkunak@castaicareatowncouncil.org)

Marty Kreisler - [MartyKreisler@castaicareatowncouncil.org](mailto:MartyKreisler@castaicareatowncouncil.org)

Greg Kimura - [GregKimura@castaicareatowncouncil.org](mailto:GregKimura@castaicareatowncouncil.org)

Stephanie Ebia - [StephanieEbia@castaicareatowncouncil.org](mailto:StephanieEbia@castaicareatowncouncil.org)

Sandia Ennis - [Sandiaennis@castaicareatowncouncil.org](mailto:Sandiaennis@castaicareatowncouncil.org)

Dean Paradise - [DeanParadise@castaicareatowncouncil.org](mailto:DeanParadise@castaicareatowncouncil.org)

Dawn Faulconer - [DawnFaulconer@castaicareatowncouncil.org](mailto:DawnFaulconer@castaicareatowncouncil.org)

### **Val Verde Civic Association**

Greg Kimura - [gregkimura3@sbcglobal.net](mailto:gregkimura3@sbcglobal.net)

Jaime Briano - [jaimeb1211@yahoo.com](mailto:jaimeb1211@yahoo.com)

Ramon Hamilton - [ramon@thinktenmediagroup.com](mailto:ramon@thinktenmediagroup.com)

Steve Lee - [artstevesteve6@msn.com](mailto:artstevesteve6@msn.com)

Kevan Smalley - [k.smalley@sbcglobal.net](mailto:k.smalley@sbcglobal.net)

Carlos Lopez - [magnificocarlos@sbcglobal.net](mailto:magnificocarlos@sbcglobal.net)

Christopher Morris - [fnboyv1@yahoo.com](mailto:fnboyv1@yahoo.com)

Iris Neal - [HelloIris@att.net](mailto:HelloIris@att.net)

### **Val Verde Civic Association - Landfill Committee**

Greg Kimura - [gregkimura3@sbcglobal.net](mailto:gregkimura3@sbcglobal.net)

Jaime Briano - [jaimeb1211@yahoo.com](mailto:jaimeb1211@yahoo.com)

Ramon Hamilton - [ramon@thinktenmediagroup.com](mailto:ramon@thinktenmediagroup.com)

Frank Miscone - [fMConsulting@me.com](mailto:fMConsulting@me.com)

Norma Herrera - [refugiom57@att.net](mailto:refugiom57@att.net)

~~Vanessa Brookman~~

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**From:** Greg Kimura [gregkimura3@sbcglobal.net]  
**Sent:** Tuesday, August 12, 2014 1:18 AM  
**To:** info@valverdecac.org  
**Subject:** Chiquito Canyon Landfill expected to take in waste from tainted site?

Dear VWCAC Board,

Recently, I was made aware of an article which states that Chiquita Canyon Landfill is planning to accept large amounts of waste from the Rocketdyne site in Simi Valley. Prior to moving here, I lived in Simi Valley. A long running lawsuit was finally settled, regarding nuclear waste, toxic rocket fuel spillage, explosions and contaminated dirt. I know of a neighborhood near the site, where every household had someone with cancer.

This report shows Chiquita Canyon Landfill as being a company which will accept this so called "cleaned up" dirt. If this is cleaned up, then why is it necessary to dump it? Why can't it be left at the site?

Since the landfill has not only bid on, but accepted sludge (again, it was a banned waste product in their use permit), we can no longer accept their word at face value.

Can you look into the treatment of this material. Do you feel it would be safe to bury on your property? It is not local SCV waste, therefore why should we take the risk for another city? If I lived in Simi Valley, I would rather see this waste product removed from my community. Also, since the Simi Valley landfill is much closer, why don't they take it?

I am cc'ing the VVCA Board, VVCA Landfill Committee and the CATC. I will forward your response as soon as I receive it.

I am also requesting this issue be looked into right away. The results will be used to comment on the Draft EIR, which are due by mid/late September. In order to give the resident commenting enough time, I am asking to receive a response by the end of August, 2014.

Thank you.

Greg

20-1

**Vanessa Brookman**

---

**From:** Greg Kimura [gregkimura3@sbcglobal.net]  
**Sent:** Tuesday, August 12, 2014 1:48 AM  
**To:** info@valverdecac.org  
**Subject:** Radioactive waste at Chiquita Canyon

**Categories:** wrk

Dear VWCAC Board,

This comes from the LA Times. I think you'll find it interesting and I would like you to take action to make sure this waste does not reach Chiquita Canyon Landfill. For those who believe the landfill is looking out for our best interest, I think you may now disagree. Here is the LA Times Article: <http://articles.latimes.com/2002/dec/08/local/me-radwaste8/3> Here is the excerpt which is very bothersome: *"However, it does not prevent recycling or dumping of slightly radioactive dirt at farms or anywhere else. Also, it still allows dumping at more than 20 sites, including the Chiquita Canyon Landfill in Los Angeles County and the Simi Valley Landfill in Ventura County."*

According to this report, Chiquita Canyon is one of the places they may use to get rid of this "non-hazardous" material. Why isn't the Simi Valley Landfill on the list? [http://scvvtv.com/pdf/SSFL\\_Final\\_EIS.pdf](http://scvvtv.com/pdf/SSFL_Final_EIS.pdf) Also, they talk about getting rid of this "non-hazardous" material and replacing it with "clean dirt". If there is nothing wrong with it, then why are they getting rid of it and replacing it?

I am requesting the VWCAC to look into this further. Our community will need your input on this subject and we will use your answer to create a comment to the Draft EIR. Again, due to the end of the comment period in mid/late September 2014, I ask that you expedite this request.

I have send a blind cc to the WVCA Board, WVCA Landfill Committee and the CATC. I will also send them your response.

20-1  
cont'd  
repeat-  
ed  
com-  
ment

Thank you.

Greg



Sierra monitor corporation

91 Tarob Court, Milpitas, CA 95035

(408) 262-6611 / (800-727-4377) Fax: (408) 262-9042

Website: www.sierramonitor.com

QUOTATION

FOR: Val Verde Community Advisory Committee
PO Box 800034
Santa Clarita, CA 91380
Phone 661/505-8350 Email Vanessa\_In\_Val\_Verde@Yahoo.com
ATTN: Vanessa Brookman
REF: Methane Detection on or near a Land Fill

QUOTE NO: 92310 Rev 1
REGION: Western
DATE: August 13, 2014
TERMS: \*Net 30 Days
F.O.B.: Factory
VALIDITY: 90 Days
DELIVERY: 2-4 Weeks, ARO

GAS ALARM / MONITOR PRODUCTS

Gas Detectors offering a Relay Contact, Audible Alarm or TTL Alarm Signal when gas concentration reaches preset alarm.

Table with 5 columns: ITEM, MODEL, DESCRIPTION, QTY, UNIT PRICE, TOTAL. Row 1: 1, 2001-00\*, Monitors, 5, 315.00, \$ 1,575.00. Includes notes on calibration and freight charges.

\* Upon Approval of Credit

Handwritten signature of Gary Hunt

Gary Hunt, Western Sales Manager
Phone (408) 964-4429

FOR SIERRA MONITOR CORPORATION

## Letter No. 20

Greg Kimura c/o Val Verde Community Advisory Committee

### Response to Comment No. 20-1

Please see Topical Response #29a for a discussion of Wastes to be Disposed and Topical Response #29b for a discussion of the Waste Screening and Acceptance Program.

**Strengthening the Voice of Business**

- Chambers of Commerce
- Alhambra
- Arcadia
- Bell Gardens
- Beverly Hills
- Burbank
- Century City
- Culver City
- El Monte
- Filipino American Los Angeles
- Filipino American South East Corridor
- Glendale
- Greater Lakewood
- Greater Los Angeles African American
- Harbor City / Harbor Gateway
- Hollywood
- Irwindale
- Korean American
- LAX Coastal Area
- La Canada Flintridge
- Long Beach Area
- Los Angeles Area
- Los Angeles Latino
- Los Angeles Metropolitan Hispanic
- Malibu
- Manhattan Beach
- Montebello
- Pacific Palisades
- Pasadena
- Pomona
- Redondo Beach
- Regional Black
- Regional Hispanic
- Regional San Gabriel Valley
- Rosemead
- San Pedro Peninsula
- Santa Clarita Valley
- Santa Monica
- Santa Monica Junior
- South Bay Association
- Toluca Lake
- Torrance Area
- United Chambers San Fernando Valley
- Universal City North Hollywood
- U.S. Mexico
- Vernon
- Vietnamese American
- West Hollywood
- West Los Angeles
- Westside Council
- Wilmington
- Woodland Hills -Tarzana
- Trade Associations and Minority Business Groups
- AIA Los Angeles
- American Beverage Association
- Antelope Valley Board of Trade
- Apartment Association, CA Southern Cities
- Apartment Association of Greater Los Angeles
- Arcadia Association of Realtors
- Asian American Business Women Association
- Asian Business Association
- Beverly Hills / Greater LA Association of Realtors
- British American Business Council
- Building Industry Association, LA / Ventura
- Building Owners & Managers Association, LA
- Burbank Association of Realtors
- California Apartment Association, LA
- California Cannabis Industry Materials
- California Construction Industry and Materials Association
- California Contract Cities Association
- California Grocers Association
- California Independent Bankers
- California Independent Petroleum Association
- California Metals Coalition
- California Small Business Alliance
- Carson Dominguez Employers Alliance
- Central City Association
- Citrus Valley Association of Realtors
- Construction Industry Air & Water Quality Coalitions
- Council on Trade & Investment for Filipino Americans
- Employers Group
- Engineering Contractor's Association
- Entrepreneurs' Organization LA
- Fixing Angelenos Stuck In Traffic (FAST)
- FuturePorts
- Gateway to LA
- Glendale Association of Realtors
- Greater LA New Car Dealers Association
- Harbor Association of Industry & Commerce
- Harbor Trucking Association
- Hospital Association of Southern California
- Hotel Association of Los Angeles
- Industry Manufacturers Council
- International Warehouse Logistics Association
- LA SHARES
- League of California Cities
- Los Angeles County Bicycle Coalition
- Los Angeles County Economic Development Corp.
- Los Angeles County Waste Management Association
- Motion Picture Association of America
- NAIOP Southern California
- National Association of Women Business Owners, LA
- National Latina Business Women Association
- Pasadena-Foothills Association of Realtors
- Recording Industry Association of America
- San Gabriel Valley Economic Partnership
- Santa Clarita Valley Economic Development Corp.
- So Cal Minority Supplier Development Council
- South Asian Business Alliance Network
- South Bay Association of Realtors
- South Park Stakeholders Group
- Southern California Golf Association
- Southern California Grantmakers
- Southland Regional Association of Realtors
- Tri-Counties Association of Realtors
- U.S. Green Building Council
- Valley Economic Alliance
- Valley Economic Development Center
- Valley Industry & Commerce Association
- Valley International Trade Association
- We Care for Humanity
- Western Manufactured Housing Association
- Western States Petroleum Association

August 20, 2014

Iris Chi  
 County of Los Angeles  
 Department of Regional Planning  
 320 West Temple Street  
 Los Angeles CA 90012

**Re: SUPPORT Chiquita Canyon Landfill Expansion - DEIR**

Dear Ms. Chi:

On behalf of BizFed, the Los Angeles County Business Federation, a grassroots alliance of more than 120 major business organizations representing 268,000 businesses with 3 million employees throughout our region, we are writing in support of the proposed expansion of Chiquita Canyon Landfill. (DEIR – R2004-00559-5)

**Chiquita Canyon Landfill has more than 40 years of clean and safe operations serving the Santa Clarita Valley. With our landfills stretched to capacity, the Chiquita Canyon Landfill should have the lateral expansion it seeks so it can continue to provide vitally needed service to our communities.**

The landfill currently only utilizes one-third of their property and needs to expand to maximize the disposal capacity of an existing landfill location for the next two decades. If the landfill is not allowed to expand, it will instead close in 2019 – meaning increased costs for trash-hauling, increased truck traffic for hauling and increased potential adverse impact on our region’s air quality.

The landfill is an environmentally sound operation that uses a state-of-the-art composite liner that holds waste safely in the landfill. There also are numerous monitoring wells to ensure safety of our groundwater. In addition, all naturally occurring methane gas generated by the landfill is used to power a 9.2 megawatt clean energy facility.

This safe, pragmatic expansion of a reliable landfill facility is a solid step forward for our future.

Please feel free to contact us if you should you have any questions.

21-1

Sincerely,



Don St. Clair  
 BizFed Chair  
 Woodbury University



David Fleming  
 BizFed Founding Chair  
 Latham & Watkins LLP



Tracy Rafter  
 BizFed CEO  
 IMPOWER, Inc.

# Letter No. 21

Don St. Clair  
Los Angeles County Business Federation  
1000 N. Alameda St., #240  
Los Angeles, CA 90012

## Response to Comment No. 21-1

Comment acknowledged.

DEPARTMENT OF TEACHING & LEARNING

August 23, 2014

Los Angeles County  
Department of Regional Planning (Attn: Ms. Iris Chi)

RE: Comments on the DEIR for the Chiquita Canyon Landfill Master Plan Revision  
(Project No. R2004-00559-(5))

Gentlemen/Mesdames:

I am submitting this correspondence as my formal comment in response to the notice of hearing / completion and request for comments on the above-mentioned Draft EIR. As part of my comments, I am also including two attachments to support my review of the proposed project and DEIR. These attachments, which should be considered part of my comments, are:

Attachment 1: Air Quality Risk Assessment for Proposed Expansion of Landfill  
(Val\_Verde\_Risk\_Assessment\_2005/pdf)

This attachment presents a risk assessment conducted by my class in Environmental Impact Analysis, in 2005, under my supervision. Some caveats: it was prepared as an academic exercise, and it was also done with a slightly different proposed landfill expansion. However, while academic, the work was done in the exact manner as a professional product, subject to the same standards of quality. Also, while the project we analyzed was different from the subject project of the DEIR, my understanding is that the additional tonnage of waste to be received by the landfill under the proposed project would be similar from that which we analyzed in 2005. For this reason, the attached analysis should be a reasonable approximation of the impacts of the proposed project.

22-1

Attachment 2: Environmental Justice Analysis of Chiquita Landfill  
(Lejano\_&\_Stokols\_JAPR.pdf)

The attachment is a published journal article that describes an Environmental Justice analysis I conducted (along with other collaborators) of the Val Verde situation –i.e., effects of the proximity of the Chiquita Landfill on the residents of Val Verde, California.

I should also note that environmental risk analysis and environmental justice are two subjects on which I am considered an authority and about which I have taught over the years. I taught a graduate class on risk assessment for a number of years at the University of California, Irvine and, previous to that, at the Massachusetts Institute of Technology. I have since moved to New York University where I presently teach in the Environmental Conservation Education program.

Also, note that the attached comments are mine only and not to be attributed to any of my research collaborators, students, and other associates. My comments are:

Comment 1: Significant Incremental Cancer Risk

The proposed project should significantly increase the average annual cancer risk to the MEI (above the stipulated significant threshold of 10 in a million risk).

22-2

As shown in Attachment 1, significant increases in average annual cancer risk to the maximally/most exposed individual (MEI) would result from two sources: VOCs (volatile organic compounds) generated by the landfill/waste and diesel particulates from heavy equipment and trucks operating on the landfill. As shown in Table 1 in page 14 of Attachment 1, additional average annual cancer risks to the MEI due to the proposed project can be as high as 420 in a million (from both VOCs and diesel particulates generated at the landfill). One can be reasonably assured that the proposed project poses a significant additional cancer risk to the residents of Val Verde. Moreover, the existing landfill already adds a significant risk of cancer to Val Verde residents, a fact that the DEIR (and by extension, the County) does not acknowledge. An updated risk assessment can be very readily done.

22-2  
cont'd

Comment 2: Significant Odor Impacts  
Over the course of my association with residents of Val Verde and in my various investigations of environmental impacts of the landfill on the same, it has become clear that odor impacts of the landfill on these residents are serious (even after VOC capture facilities were installed). These impacts are intermittent –i.e., they occur during particular times during the day but will disappear at other times. Moreover, they seem to be caused by a complex mix of organic compounds that are difficult to analyze in the lab –e.g., standard VOC analyses by GC and HPLC will not measure for these compounds (which include mercaptans but also unidentified compounds). But they exert a heavy environmental burden on the residents. The evidence of this is best gathered observationally (through a continuous presence of observers over a month, for example, at different times of the year), and through interviews of Val Verde residents, as we conducted as described in Attachment 2. Thus, it is clear that an increase in the waste throughput of the landfill will undoubtedly increase the potential for odor impacts.

22-3

Comment 3: Significant Environmental Justice (EJ) Impacts  
As described in Attachment 2, the residents of this predominantly minority, lower-income neighborhood of Val Verde do express an experience of being unjustly treated by the County –in fact, being a sacrifice zone to receive wastes from the rest of the region. As described in Attachment 2, the impacts on the residents are physical/environmental, but these also include serious experiences of dread, emotional fatigue, and social stigma. Val Verde is a majority-Latino community with a mean annual resident income below that of the County average. As our cognitive mapping exercises and interviews indicate (as summarized in Attachment 2), experiences of injustice from the location and operation of the landfill can be documented in rigorous fashion. Efforts to map the salience of objects in the environment indicate that the landfill has measurable affective effects on the psyche of Val Verde residents –this is shown in Figure 1 on the following page. The EJ related impacts of the proposed project include both the disproportionate environmental and social injury to the Val Verde residents, which is obvious since this lower-income community of color is conscripted to receive waste that it did not generate and suffer effects the rest of the County residents do not, but also to the lack of benefits (such as receipt of a share of tipping fees, job allocation/quota for local residents, infrastructure/urban amenities, health services and insurance, etc.) that might possibly partially ameliorate for the negative impacts of the landfill.

22-4

The environmental justice implications of Chiquita landfill add to the existing injustice suffered by Val Verde residents in the way of inadequate infrastructure/facilities (e.g., street lighting, drainage, etc.) that corresponds to a more rural, as opposed to urban, land classification. The level of inadequacy of these urban amenities and infrastructure elements can be systematically measured and documented.

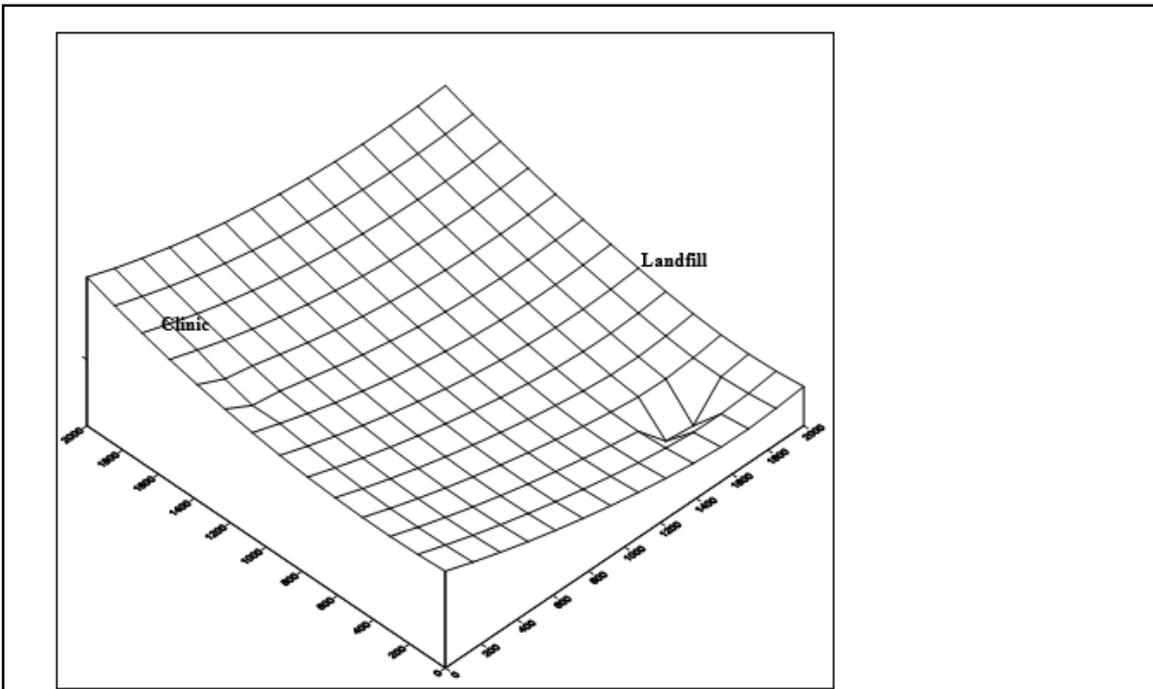


Figure 1. Mapping of Level of Salience of Objects in Landscape (Val Verde, California)

(Note: The map in Figure 1 was produced by measuring the distortions in measured/perceived distances in free-sketched cognitive maps drawn by Val Verde residents. The landfill was systematically perceived, to a statistically significant degree, to be closer than it is, which the researchers take to be an indication of psychological affect/salience.)

I hope that these comments will be considered in deciding on the fate of the project. It is clear to this environmental professional that the presence and, more so, proposed expansion, of the Chiquita landfill is a serious environmental justice problem for the residents of Val Verde –a problem that poses significant impacts from health risks (cancer, but also noncancer), odors, solid waste and refuse, and emotional/cognitive burden. It is clear to me that the No Project Alternative is the superior one, from a CEQA (not to mention ethical) standpoint. Lastly, the inadequacy of the DEIR, especially with regard to the above-mentioned impacts, and CEQA process adds to the injustice of the proposed project.

Sincerely,

Raul Lejano, PhD  
 Associate Professor  
 Steinhardt School of Culture, Education, and Human Development  
 New York University  
 New York, NY 10003 USA  
 Email: lejano@nyu.edu  
[http://steinhardt.nyu.edu/faculty\\_bios/view/Raul\\_Lejano](http://steinhardt.nyu.edu/faculty_bios/view/Raul_Lejano)

22-4  
 cont'd

# **Environmental Analysis of the Proposed Chiquita Canyon Landfill Expansion**

December, 2005

Prepared by Graduate Students in U234 Environmental Analysis

under the guidance of Professor Raul Lejano

(may not be used or cited without express permission of Prof. Lejano)

**School of Social Ecology  
University of California, Irvine**

### **Foreword and Disclaimer**

This report was prepared as part of U234, a graduate class in Environmental Analysis taught at the University of California, Irvine by Professor Raul Lejano of the School of Social Ecology.

We remind the reader that the analysis and conclusions in the report are preliminary. The analysis is based on the best information that was available to the class, but this does not mean that the analysis and findings are final or conclusive. Rather, the authors maintain that better information could be forthcoming that could allow a more accurate analysis in the future.

Moreover, while there were reasonable attempts to conduct quality control on the analysis, this does not amount to the same degree of professional and rigor that would be done for a consulting contract or legal/regulatory analysis. We, however, maintain that the analysis and findings herein are suggestive of real factors and concerns with the landfill expansion. They can be used as being suggestive of more detailed analyses that will be required in any CEQA-required analysis.

We make no assurances that the analysis may be free from errors, omissions, or inaccurate data and, as a result, are not bound to refine, redo, or modify the report in the future. However, we also maintain that the analysis is the best available, given the information that was available to the class. The potential impacts identified herein should be taken seriously by agencies and members of the public. Moreover, this analysis can be used as a template for CEQA impact assessments or included in the public record in CEQA or other public deliberations concerning Chiquita Landfill. As always, any errors or omissions in this report are solely the responsibility of the authors and not any of the institutions with which they are affiliated.

## Summary

The research group studied potential environmental impacts associated with the Chiquita Landfill, both at present and assuming a hypothetical expansion. The work involved extensive review of environmental conditions, meetings and interviews with community members, and environmental analysis. The researchers found at least three sources of impact to the surrounding community and environment that pose potential for serious, significant adverse impacts:

### 1. **Water Quality and Impacts to Receiving Waters and Community**

There appears to be the real potential for runoff and leachate from the landfill, during storm events, to contaminate the surrounding community of Val Verde and nearby receiving waters (e.g., see Figure 1 for an aerial showing a nearby creek immediately to the east of the landfill). This is corroborated by residents' accounts of runoff from the nearby hills overflowing into community streets and yards.

### 2. **Nuisances from Truck Traffic Associated with the Landfill**

The proposed expansion will result in a lengthening of the landfill life, with the result being added years during which truck traffic (from haulers taking trash to the landfill) will continue to impact the surrounding community. Impacts, as revealed in resident interviews, include noise, litter, vectors, dust, and others. Moreover, it is not altogether clear that the expansion will not also result in an increase in the number of trucks accessing the landfill each day --if so, this is also a significant source of nuisance.

### 3. **Air Quality Impacts to the Community**

The landfill, at present, is seen to pose significant health and nuisance-type impacts to the residents of Val Verde. These impacts will extend over a longer duration as a result of the landfill expansion, resulting in a larger cumulative risk burden to the community. Moreover, the larger total amount of landfill refuse may also contribute larger amounts of air toxics (e.g., VOCs) coming from the landfill and into the surrounding environment. The air quality impacts include cancer risks, noncancer-related toxicity, odor, and others.

Of the three areas of impact listed above, air quality was the one for which a detailed, quantitative analysis was performed. In the succeeding pages, the quantitative analysis is presented. The findings show that additional cancer risks posed by the landfill, both present and the incremental amount due to the expansion, are significant across the entire community. Moreover, risks to the maximum exposed individual (in Val Verde) are seriously elevated. Impacts due to noncancer toxicity (measured as a hazard index) and odor are also seen to be serious.

The expansion will result in an increase in the daily cancer risk burden to the community (and, by extension, odor and noncancer toxicity, as well) as a result of the additional total amount of solid waste stored in the landfill. If the expansion also results in additional truck traffic each day, then this will compound this effect. Moreover, the expansion prolongs the useful life of the landfill, resulting in a greater cumulative risk burden due to added years of truck traffic, landfill use, and other sources of air quality impacts.

Lastly, the researchers find that impacts from the landfill and other sources are compounded by the lack of facilities in the town of Val Verde --including inadequate drainage, street lighting, health facilities, emergency response, curb and gutter lined sidewalks, and other needed provisions.

## **Background**

Val Verde, located in the northwestern portion of unincorporated Los Angeles County, is a small community of about 1,500 residents. The median household income is about \$53,000, the median house value is approximately \$153,000 and the median age is 27.4 years (citydata.com). The community is predominantly Hispanic, although it was originally predominately African American (Carlos Porras, personal communication). Statistically, the community's education is 67.8% with a High School degree and 9.0% with a Bachelor's education (citydata.com).

The residents of Val Verde are faced with health concerns pertaining to the Chiquita Canyon Landfill (CCL). The proposed revision - extension - of the landfill has stirred even more health concerns in the community. Consequently, along with the Union de Residentes para la Proteccion Ambiental de Val Verde (URPAVV), this project outlines some of the possible health concerns pertaining to the extension of the landfill. More specifically, this air quality analysis exemplifies the possible risks associated with the extension of the Chiquita Canyon Landfill.

Although not addressed in this report, the community is also faced with other sources of pollution. These result in cumulative risks that while not shown in this report, can be highly significant. The predominant pollutant sources are commercial and industrial. They include, but are not limited to, the Newhall Land and Farming Company, located to the west and south of Val Verde (VV), which manufactures, produces, and uses pesticides which can enter to ground water. Additionally, oil extraction fields, located less than 1 mile from the landfill to the west and south, are possible sources of pollution (Los Angeles County, 2005). Interstate 5, less than 3 miles from VV, and State route 126, less than 1.5 miles from VV, are also possible source of air pollutants. A railroad, which runs parallel to State route 126, also contributes to air pollution in the community.

Prior to the establishment of URPAVV, Lucha Ambiental para la Comunidad Hispana (LACH), or Environmental Struggle for the Hispanic Community, constantly sought to gain health services within the community. In 1995 URPAVV challenged the continued operation of the CCL. However, the LA County Board of Supervisors voted 4:0 in favor of the current landfill. Subsequently, along with Clean Water Action, URPAVV took their suit to the Supreme Court. The lack of a water report in the EIR and a 22-point discrepancy in a calculation lead the judge to order a settlement agreement (Carlos Porras, personal communication). The settlement agreement involved well monitoring ~every 500 feet throughout the landfill site. To this day, the CCL has provided the community with little or no information, as URPAVV remains unaware of the location of wells. The settlement agreement also ordered air monitoring from which URPAVV was to receive the reports. URPAVV received reports the first two years (1996-97) only via legal action and has received no reports since 1997.

### *Proposal Background*

The County of Los Angeles, as lead agency, is proposing to expand the Chiquita Canyon Landfill (CCL). Specifically, the "Chiquita Canyon Landfill Master Plan Revision would extend the waste footprint at the CCL by approximately 98 acres within the existing site boundary" (LA County 2005). The expansion is both to the east and south of the current landfill and is intended to help meet the increasing waste demands of the metropolitan Los Angeles area. According to the Notice of Preparation (LA County 2005), the expansion is necessary as a "cost-effective" disposal center due to the "under-utilized" acreage owned within Chiquita Canyon. The existing CCL permit allows for the waste footprint to cover 257 acres of the owned 592 acres. The county

does have two options in extending the life of the current CLL; they can either raise the current height of the waste or expand the actual dumping site. By expanding the actual dumping site first the county leaves the option to raise the height as the new expansion fills, thus increasing upon the original fill capacity twice. There is no request to extend the amount of weekly trash delivery, only to extend the actual usable lifetime of the CCL and to accept water treatment and wastewater residues. However, the forthcoming Draft Environmental Impact Report (EIR) will include a Site Optimization Option which will include the analysis of increasing the waste height, disposal rate, disposal volume, and overall landfill operations (LA County 2005).

Within the Air Quality section of the Notice of Preparation (NOP) (LA County 2005) several impacts are listed as definite or potential. They include:

- Exceedance of “the State’s criteria for regional significance”
- An increase in “local emissions to a significant extent”
- Creation of “obnoxious odors, dust, and/or other hazardous emissions”
- Violation of air quality standards
- “Net increase of any criteria pollutant”

### *Community and Health Concerns*

The Los Angeles community of Val Verde already has health concerns about living in proximity to the CCL. The proposed expansion only increases these fears. Not only are there aesthetic and odor concerns, but there are real health concerns, concerns exacerbated by a local family dealing with two members fighting cancer and the cancer death of a third family member, also due to cancer. This family lived near the CCL and the “Maximum Exposed Individual.”

Health concerns of the community are backed by recent literature and aggravated by the fact that Val Verde is a young community, with the average age of only 27.4. Included among the health concerns voiced by the community and represented in the literature are, asthma (Fielder et al, 2001; Pukkala 2001), other respiratory disease and illness (Heller and Catapreta 2003; Gelberg 1997), birth defects (Rushton 2003; and Fielder et al. 2001), and cancer (Rushton 2003; Jarup et al. 2002; Pukkala 2001). Headaches and nausea were also listed among the citizen’s concerns.

Due to time and course restraints we were unable to address more than one environmental and health concern addressed with the expansion of the CCL. In addition to the increased cancer risks displayed in our results there would also be increased non-carcinogenic health risks, such as those addressed in the Community and Health Concerns section above. The landfill expansion also raises other environmental questions, such as its impact on water quality and flooding via stormwater runoff.

There are two major impacts within stormwater runoff. First are the environmental and health risks associated with re-entrainment and soil impaction. Re-entrainment is characterized by the erosion and movement of contaminated soils. Within the Val Verde community this sediment ends along roads and backyards. With no stormwater drainage system the contaminated sediments remain in the backyard or along the sides of roads until the next storm carries them further. In the meantime is the re-entrainment, when the pollutants within the sediments become airborne as dust particles. Another concern is soil compaction. Stormwater runoff within and surrounding the landfill will increase as the soil is compacted and any paved surfaces are expanded. There is less area for the rainwater to percolate, therefore the water is carried over the

landfill and either seeps down toward the groundwater table (though the landfill is said to be sealed from this) or is carried into a local stream.

Runoff into local streams is a second concern. There are two blue line streams, waterways with water year-round and included on topographic maps, within the CCL expansion zone. This runoff is directed topographically toward the Castaic Lake or streams flowing into the Pacific Ocean. The obvious concerns are for the quality of these intermediate and receiving bodies of water and for any nearby ecosystems. Any alteration to the blue line streams also raises the risk of flooding both upstream and downstream of the landfill.

### **The Study: air analysis pertaining to the proposed expansion**

We hypothesized that the gases emitted from the landfill and the emissions of the trucks and equipment used in landfill activities would decrease the air quality to a level with significant health concerns. Using EPA's air dispersion model, ISCST3, and ArcGIS, we have modeled and mapped the potential cancer risks directly associated with the proposed CCL expansion. The reauthorized Clean Air Act stipulates a cancer risk threshold to the Maximum Exposed Individual (MEI) of no more than one in one million. Our hypothesis continues that the proposed expansion will greatly exceed this significance threshold.

### **Diesel Emissions from Refuse Trucks and Equipment**

#### *Method of Calculations*

As of December 2005, the Draft EIR for the Chiquita Canyon Landfill Expansion has yet to be created, and the original Draft EIR, drafted in the early 1990s was difficult to obtain. As no data was readily available, emissions from diesel exhaust were estimated from draft EIRs of other landfill projects. Draft EIRs used included the Contra Costa Landfill expansion and Olinda Landfill in Orange County. Particulate matter of 10 micrometers (PM10) was assumed to be the primary constituent of diesel exhaust emitted from the vehicles. Particulate matter of this type also poses a high risk of respiratory problems.

The Air Analysis section located in the Draft EIR of the Olinda Landfill indicated an average disposal rate of 7,000 tons per day (tpd). The Olinda Landfill PM10 emission was divided by the tons per day and the data was normalized by multiplying by the current CCL maximum disposal rate of 5,000 tpd. In order to input the data into the air dispersion model, the emission rate in g/s had to be divided by the area of the landfill estimated within the rectangles created on the GIS map. This area was determined to be 645 m x 1,800 m = 1,160,000 m<sup>2</sup>.

The emission rates were estimated to be  $3.52 \times 10^{-08}$  g/s/m<sup>2</sup> from waste trucks and  $7.01 \times 10^{-08}$  g/s/m<sup>2</sup> for the equipment. The emission rates calculated for the Contra Costa County was higher by a factor of 10 and therefore, the Contra Costa values were used instead to assume the worst case scenario. The emission rate from waste trucks for the Contra Costa project was calculated to be  $2.20 \times 10^{-07}$  g/s/m<sup>2</sup> and the emission rate from the equipment was  $3.10 \times 10^{-07}$  g/s/m<sup>2</sup>. Independent calculations (from an equipment contractor), however, suggest that actual diesel emissions from bulldozers and other on-site equipment could be as much as ten times higher --i.e., 80 hours at an estimated average 150 kWh emitting .34 gr/kWh (interview with R. Jerominek). These alternative emissions rates increase cancer risk estimates considerably.

Diesel exhaust particle emissions from both trucks and equipment were modeled separately, using the EPA-approved air dispersion model, ISCST3. Meteorological data was taken from the Newhall monitoring station. The concentrations were multiplied by the cancer unit risk factor (URF) for diesel exhaust,  $3.0 \times 10^4 \text{ m}^3/\mu\text{g}$ , to estimate cancer risks. Note that we chose not to model the effect of the surrounding topography and, instead, treated the entire area as a flat surface. We find that, as the landfill is continuously being filled up, the upper level of the landfill gradually reaches the top of the surrounding ridgeline, and the effect of the latter decreases with time. As an approximation, we could simply treat it as a flat surface. We also do not correct for any tendency of the canyon-like topography of the town of Val Verde to funnel and concentrate any emissions from the nearby landfill (which residents strongly suspect is occurring).

### *Results and Discussion of Truck and Equipment Emissions*

Diesel exhaust is a complex mixture of gases and particles released by diesel-fueled internal combustion engine. The exhaust includes air pollutants as carbon monoxide (CO), sulfur oxides (SOx), nitrogen oxides (NOx), polyaromatic hydrocarbons (PAHs), as well as particulates that are less than  $10\mu\text{m}$  (PM10), which includes particles with diameters  $2.5 \mu\text{m}$  or less. Short-term exposure to diesel exhaust can cause: irritation of eyes, throat, lungs, light-headedness, headache, heartburn, weakness, numbness, tingling extremities, chest tightness, wheezing, coughing, nausea, and vomiting. Long-term exposure can cause chronic respiratory symptoms, kidney damage, and increased risk of lung cancer. We modeled cancer risk as being the primary health concern, especially since the residents are exposed over a long period of time.

Cancer risk for the Val Verde residents ranged from 50 to 200 in one million due to diesel exhaust from the landfill equipment emissions (Figure 1.), with the majority of the town exposed to approximately 50 in one million risk and the MEI exposed to a 200 in one million risk. Similarly the cancer risk from diesel trucks hauling waste to the landfill ranged from 50 to 200 in a million, with the majority of the town exposed an approximately 50 in a million risk and the MEI exposed up to a 200 in a million chance (Figure 2.). Table 1 summarizes cancer risks due to the landfill at selected points within Val Verde, showing that residents living in the edge of town closest to the landfill experience the highest cancer risk and cancer risk decreasing with distance from the landfill. In summary, the models show that a majority of residents experience a cumulative cancer risk over 100 in one million, which is 100 times greater than the Clean Air Act's cancer risk threshold of 1 in one million, due only to air toxics from the landfill. (Actual cancer risks are higher, of course, since these would include cancer risks from all sources, not just the nearby landfill).

Independent calculations (from an equipment contractor), however, suggest that actual diesel emissions from bulldozers and other on-site equipment could be as much as ten times higher (interview with R. Jerominek). In fact, an earlier analysis based on these higher estimates result in an additional cancer risk due to the landfill of 1794 in a million (UCI, 2004).

## **VOC Emissions from the Chiquita Canyon Landfill**

### *Method of Calculation*

To estimate the emissions from the current and proposed landfill areas, the emission rates, taken from the Core Group Analysis of landfill gas sampling results, were multiplied by the amount of increase in acreage from the proposed landfill. The proposed landfill would add 98 acres to the existing 257 acres, yielding a total acreage of 355 acres, which is 1.38 times the existing acreage. This factor, 1.38, was then multiplied to individual emission rates of the volatile organic compound (VOC) gases found to be emitting from the expanded landfill. The individual compounds were then converted in units of benzene for comparison and summing purposes. The total emission rate for the carcinogens was modelled using the ISCST3 program and mapped into GIS to determine risk levels throughout the community of Val Verde (Figure 3). Hazard indices in the community from non-carcinogens were modelled using ISCST3 and estimated for Val Verde. Meteorological data was taken from the Newhall monitoring station.

### *Results and Discussion of Landfill Emissions*

The risk of cancer from landfill emissions in the community of Val Verde ranged from less than 6 to 20 in one million from lifetime exposure to landfill emissions (Figure 3). The maximum exposed individual, located nearest to the landfill in the southeast part of the town, has an estimated risk of 20 in one million of cancer from lifetime exposure to landfill emissions. The increase in acreage contributes to an increase in risk from landfill emissions. The hazard index for the total non-carcinogen emission exceeds the threshold in some areas included in the model, presumably within the landfill area itself, implying that adverse health effects from non-carcinogens is a possibility in Val Verde. A major constituent of the non-carcinogenic emissions is hydrogen sulfide gas, which can be smelled at low concentrations and cause headaches and breathing problems at elevated concentrations. Estimates of hydrogen sulfide gas concentrations are thought to be elevated within Val Verde, although it is uncertain if the gas would exceed the hazard threshold.

Unlike the emissions from diesel trucks and landfill equipment, landfill emissions are constant, and will continue well after the landfill has been closed. The increase in acreage will contribute to an increase in emissions, since there will be more area from which gases can escape. Weather can affect emission rates, since the emissions are due to natural degradation processes of the waste. Heat will likely promote gas emission from the landfill, and ambient concentrations of the pollutants in Val Verde will depend on wind direction. This is evident by the stronger odors in the spring and summer reported by the community. It is uncertain how the topography will affect air transport from the landfill into Val Verde. While the mountainous terrain may prevent some of the gases from entering Val Verde, the community will continue to be at risk, since some of the gases can settle on the community.

### **Conclusion**

Based on our calculations, the residents of Val Verde will be exposed to elevated concentrations of air pollutants associated with the landfill, and are at higher risk of health effects due to the pollutants. The proposed expansion will increase the amount of air pollutants due to increased area of gas emission from the landfill. Emissions from landfill vehicles may also increase in order to maintain proposed acreage. The cumulative risks from landfill emissions and vehicles is approximately 125 in one million throughout the community of Val Verde, with the MEI exposed to 200 in one million. However, the cumulative risks estimated in this report do not include background air pollutant concentrations, freeway and highway traffic,

and emissions from other sources, such as agriculture, oil production, and nearby industries. Also, other possible sources of pollution that were not addressed in this report include surface water contamination due to runoff from the current and proposed landfill, ground water quality, soil contamination, dust production, and the possibility of increased erosion due to the landfill expansion. Such sources of pollution may further raise health risks posed to the community of Val Verde. Moreover, estimates of diesel emissions from onsite equipment may be higher than that used herein (interview with R. Jerominek) --an earlier estimate based on these higher estimated emissions actually result in an additional cancer risk due to the landfill of 1794 in a million (UCI, 2004).

Detailed analysis of the residents' experience of impact from the landfill may also be found in a forthcoming research article referenced herein (Lejano et al., 2006). We also find that environmental impacts due to the landfill are only compounded by the poor infrastructure found in Val Verde. For example, the lack of adequate drainage only adds to the potential for health risks due to runoff from the landfill and surrounding topography. The lack of street lighting and parking only increases the chances for landfill related traffic to be using community roads and open spaces for parking or idling. These considerations should be considered in determining the cumulative impacts of the landfill, at present and with the proposed expansion, to residents in the surrounding communities.

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Figure 1: Risks associated with emissions from landfill equipment.

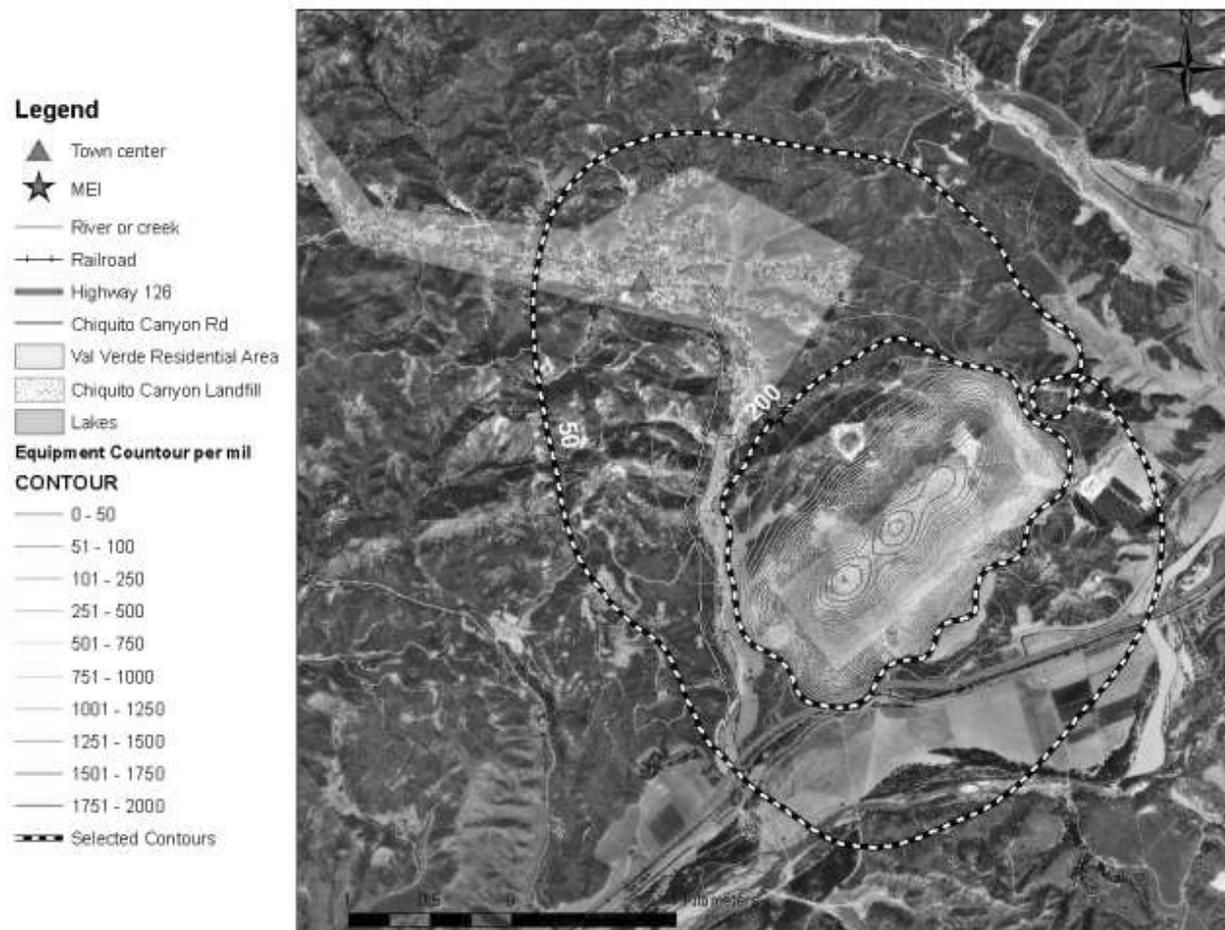


Figure 2: Risk associated with emissions from diesel trucks

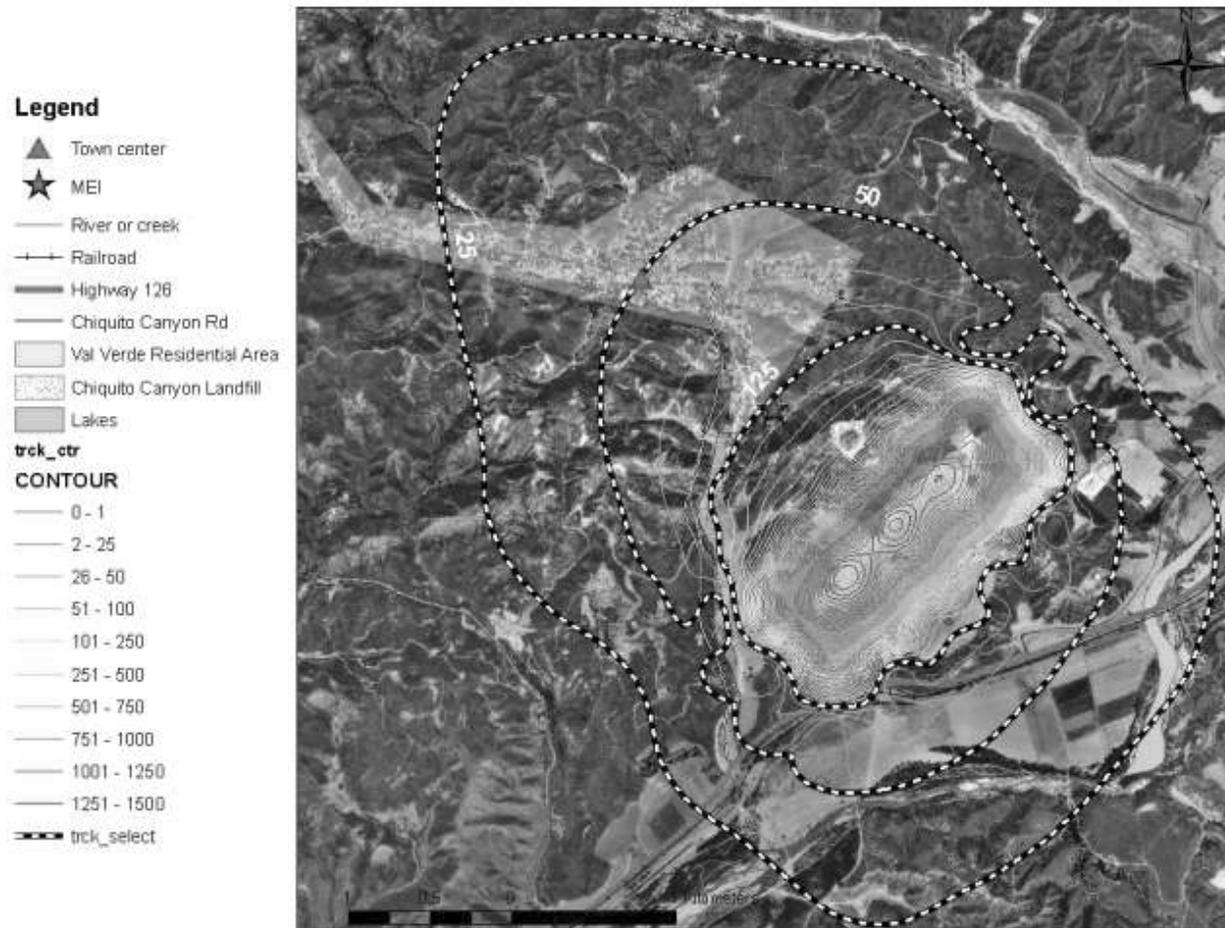


Figure 3: Additional risks associated with VOC emissions from the expanded landfill



Figure 4: Total risk associated with emissions from the trucks, equipment, and landfill gases.

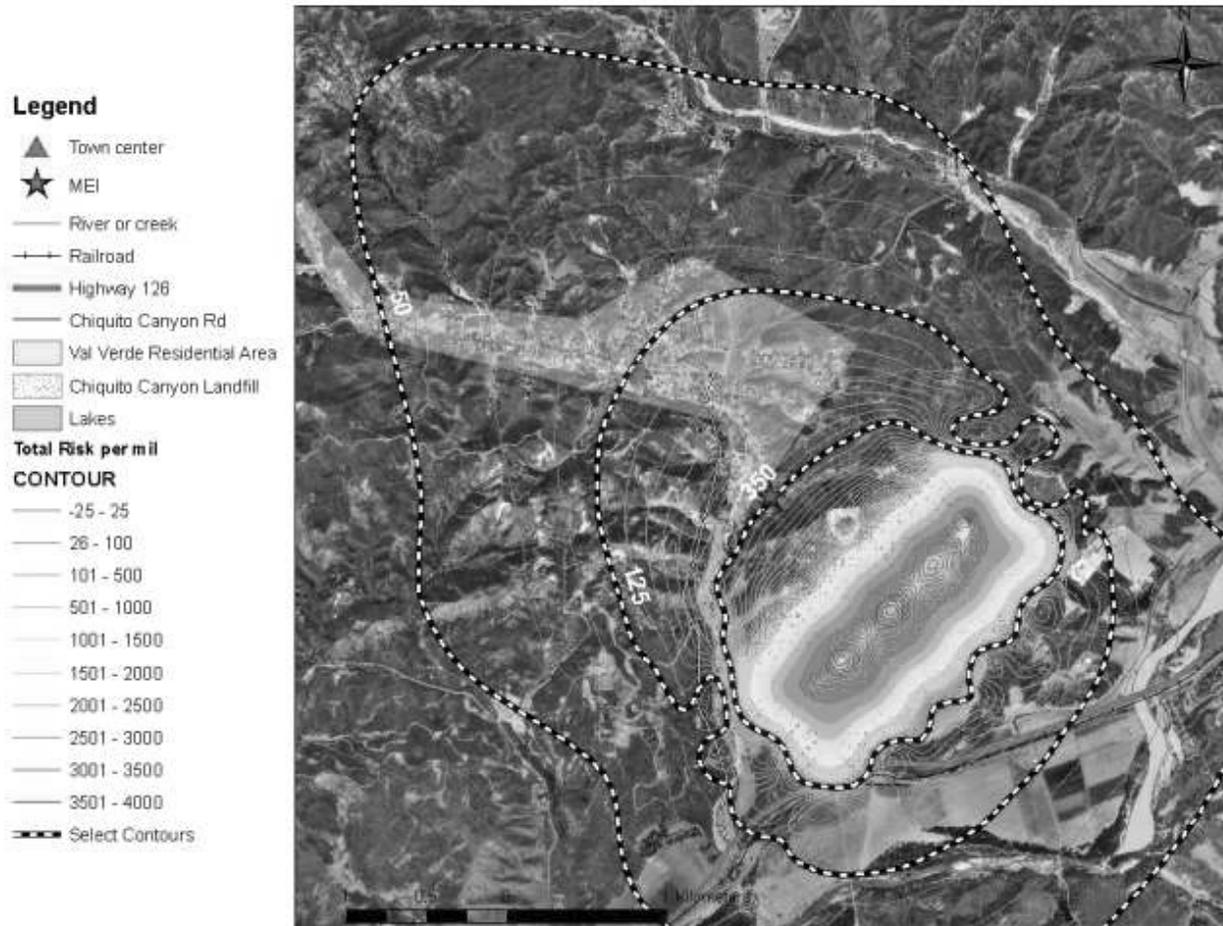


Table 1: Additional Cancer Risk for Val Verde Residents due to the Chiquita Canyon Landfill\*

**Cancer Risk for Val Verde Residents from Chiquita Canyon Landfill**

	<u>Approx. Cancer Risk (chance per million)</u>		
	<u>Maximum Exposed Individual-MEI (closest town edge)</u>	<u>Town Center</u>	<u>Farthest Town Edge</u>
<b>Diesel Particulates</b>			
Equipment	200	50 - 100	0 - 50
Diesel Trucks	200	50 - 100	0 - 50
<b>VOC</b>	20	< 6	< 6

\* Note: Higher estimates (1794 in a million) of total additional cancer risk due to the landfill were found in an earlier analysis (UCI, 2004).

## UNDERSTANDING MINORITY RESIDENTS' PERCEPTIONS OF NEIGHBORHOOD RISKS AND ENVIRONMENTAL JUSTICE: NEW MODALITIES, FINDINGS, AND POLICY IMPLICATIONS

*Raul P. Lejano*

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*There is a pressing need to more deeply understand how incompatible land-use patterns intersect with place attachment and experiences of environmental injustice. While environmental policy is strongly influenced by the classic, probabilistic model of environmental risk, the present research instead aims to develop notions of environmental impact that more closely reflect the lived experience of community residents. This entails employing a phenomenological stance toward the analysis of environmental impacts, as well as research methods that seek to uncover the narratives and cognitive representations that residents actually employ. In our exploration of these issues in the town of Val Verde, California, we discover how a nearby landfill encroaches on the everyday lives of the residents in ways that go beyond the classic model of risk. For example, rather than employing a positivist measure of environmental hazard, residents experience the landfill viscerally and emotionally in terms of its impacts on their everyday lives. Broadly stated, analysis is not simply to be associated with thought, but also with lived experience. We conclude the article by reflecting on the implications of this type of research for policy analysis.*

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## INTRODUCTION

The primary motivation for this research is the desire to improve policies that address the needs and aspirations of communities. We are particularly interested in the issues of environmental quality and land use (*i.e.*, what land uses are approved, where they are located, and how to deal with conflicts between these uses, especially under rapid urbanization). Most broadly, we inquire into both the kinds of knowledge that are crowded out of the policy space and the necessary avenues for institutional reform.

We begin with the fact that there are always dominant conceptual frameworks that guide public policy. In the area of environmental quality, one such framework is that of *risk*, which is classically defined as the probability that the presence of a polluting land use can lead to adverse health effects among those who live and work around it. This dominant notion often turns policy discussions into a numbers game in which the goal is to ensure that measured or estimated *risks* fall below established regulatory thresholds (*e.g.*, *de minimis* cancer risks).

Our thesis is that community members experience environmental injury in ways that are deeper and more complex than this simple notion of *risk*. We proceed to investigate aspects of this experience in a community residing near a major landfill. To go beyond the dominant framework, however, it helps us to let go of the classic, probabilistic model of *risk* and open up our investigation to understanding how problematic land uses are experienced. We put the word *risk* in italics as a reminder that the term is to be used simply as a placeholder that is to be filled in with more faithful descriptions of lived experience. In fact, in our discussions with community members, we find ourselves talking about broader notions of place and visions of a better life. In this respect, we are informed by phenomenological investigations of place (*e.g.*, Casey, 1993; de Certeau, 1999; Relph, 1993; Seamon and Mugerauer, 1985). At no point in our discussions did we introduce dominant frameworks such as *risk* or *environmental justice*—this is a necessary prerequisite for what Spiegelberg (1982) has called phenomenological “intuiting.” In fact, the researchers did not inject the landfill into the discussion until the residents broached the subject themselves.

It is clear, however, that our research in this community is not simply about the phenomenology of place but, more specifically, is about how the landfill enters into the lives of residents. As we will argue, the complex ways in which some problematic issue (such as a landfill) intrudes into the lives of community members creates a need for policy responses that respect this utter contextuality (Lejano, 2006). In this light, we found a need to use different methodologies and research artifacts to gain deeper insight into the day-to-day experiences of community residents. It is our belief that policymakers need to broaden their understanding of what constitutes policy-relevant knowledge and, correspondingly, what constitutes evidence (see also Chaudhury and Mahmood, 2008).

The reductionistic notion of *risk* traces its roots to the decision sciences. In particular, von Neumann and Morgenstern (1944) used the model of a lottery to construct a notion of *risk* as a pure probability of an uncertain negative or positive outcome. Subsequent investigations, notably by Kahneman and Tversky (1979), have shown that people do not perceive prospects as simple cardinal measures, whether on a probability or other scale. The general notion of *risk* as a positivist measure remains to this day and guides environmental policy. Conflicts about *risk* are interpreted as disagreements over measured values of these probabilities and outcomes. In this model, the problem can be solved by simply closing the gap (through better information or public-relations processes) between real, measured *risk* and public perceptions of it (*e.g.*, Lundgren and McMakin, 1998; Morgan, *et al.*, 2002). In our research, we are guided by the notion that conflicts over *risk* stem from the more basic fact that people understand *risk* in more complex and multidimensional ways than the traditional policy model allows and to a degree that better communication may never completely remedy. This sentiment is shared by other researchers in the fields of environmental psychology and risk analysis (Bickerstaff, 2004; Fischhoff, *et al.*, 1978; Rowe and Wright, 2001; Sjöberg, 2001; Slovic, *et al.*, 2004; Vaughan, 1995).

One rich source of insight into deeper structures of knowing is the very way that people talk. The study of narrative stems from the realization or claim that narrative is the most basic mode by which people transmit knowledge (Bruner, 1986; Griffin, 1993; Polkinghorne, 1988) and that, it stands to reason, narrative analysis

is a powerful way to uncover different knowledge (e.g., see du Toit, 2009; Gadamer, 1960/1975; Lyotard, 1979; Ricoeur, 1991). We do not have to wonder, for the moment, if the way people talk truly represents the way they reason. We simply have to recognize that mere stories can embody a person's or community's complex experiences and moral deliberation and that conversations can integrate the diverse experiences, knowledge, and moralities found in a place (e.g., see Forester, 1999). The other sources of content that we employ in this research are sketches done by community residents, both individually and as a group. In this way, we provide multiple forums for expression, including graphic instruments that allow communication of everyday experiences and sentiments that may be difficult to put into words. This is characteristic of the realm of post-normal science (Funtowicz and Ravetz, 1994), in which knowledge uncertainty intersects with normative conflict and nontraditional instruments like sketches become most relevant.

The modalities of analysis that we are espousing have much to do with recent efforts to foster participative planning practices (Forester, 1999; Healey, 1996; Innes and Booher, 2005). As Mehta (1998) points out, current planning and policy institutions exhibit aspects of technocracy, where positivist, scientific frames of knowing crowd out other discourses, especially in formal decision making, a point made, too, by Lyotard (1979) in his contrasting positivist versus narrative knowledge. The alternative is an intersubjective, communicative type of rationality (Habermas, 1984). This, in turn, requires new institutional designs to allow alternative ways of knowing (Schneider and Ingram, 2007). Glicken (2000) calls for modes of risk analysis that value experiential knowledge, which nonscientists acquire individually, along with value-based knowledge, which resides in the community. We see this research as responding to this call for incorporating experiential knowledge into urban planning practices, as seen in the individually based cognitive-mapping exercises and in the shared group knowledge that emerged in the collectively drawn community vision maps.

## METHODOLOGY AND CONTEXT

The study was conducted in Val Verde, California, a town with a population of just under 1,500 (U.S. Census Bureau, 2000). It is a majority Latino community (51.6% as compared to 44.6% for Los Angeles County) and low to middle income (annual per capita income of \$15,626 versus \$20,683 for the county). It is situated right next to the Chiquita Canyon Landfill, one of the largest solid-waste sites in Los Angeles County. Cancer risks to residents due to the landfill are estimated to be as high as 1,000 in a million, significantly higher than the federal guideline of one in a million (UCI, 2006). The present study was conducted with the help of URPAVV (*Union de Residentes para la Proteccion Ambiental de Val Verde*), an environmental justice advocacy group composed of residents who lobby for better environmental conditions in the town. The movement began when the county proposed the expansion of the Chiquita landfill (County of Los Angeles, 1992). When the Val Verde neighborhood association settled litigation with the county, thus allowing the expansion to take place, the group vowed to continue the struggle against the landfill and formally formed URPAVV. Most recently, the county informed the public that it was considering expanding the landfill yet again (County of Los Angeles, 2005).

The Chiquita landfill, located in the town of Val Verde, has operated since 1972. In 1998, the California Integrated Solid Waste Management Board approved an expansion plan that increased the fill area of the landfill from 154 acres to 257 acres, meaning an increase in elevation by 180 feet (County of Los Angeles, 1996). This expanded the landfill's total solid waste capacity by 23 million tons. It is presently accepting 4,930 tons per day, and if it continues accepting at that rate, it will be able to operate until 2015. Note, however, that there is presently a proposal pending to add an additional 98 acres to its fill area. Chiquita is the second largest operating landfill in Los Angeles County and is exceeded in throughput only by the Puente Hills landfill, which accepts 12,250 tons per day (Alva, 2007). The residents of Val Verde sued the county over the most recent expansion but had to settle the suit in exchange for some compensation and increased environmental monitoring requirements. URPAVV represents a group of residents who are indignant over the settlement and continue to protest the landfill.

The situation in Val Verde invokes a common thread in the broader literature on environmental justice (EJ), which focuses on the ways and extent to which lower-income communities of color are disproportionately exposed to environmental *risk* (see Bullard, 1983; Mohai and Bryant, 1992; and UCC, 1987, for some of the

earlier definitive work on EJ). Landfills are a major example of environmental injustice — in fact, one of the very first studies on EJ, a report by the U.S. General Accounting Office (U.S. GAO, 1983), revolved around the siting of landfills. There is ample work in the extant literature on the direct impacts of landfills on nearby residents in terms of the objective measures used by the agencies (see Vrijheid, 2000), as well as on less direct impacts such as property devaluation (Nelson, *et al.*, 1997) and community concern (Elliott, *et al.*, 1997). As reflected in other cases in the EJ literature, the Val Verde case exemplifies a community's unfair treatment with regard to outcomes (*i.e.*, siting) and process (*i.e.*, exclusion from risk-assessment forums). Going beyond the literature, this research adds insights into how communities are excluded from process — in this case, it is the limitation of analyses to the narrower, positivist, and objective measures privileged by the agency, ignoring the broader, multidimensional ways of understanding employed by the community (see also Sassa, 2002).

The community group approached the university researchers with an existing agenda. The goal of the collaboration was a series of planning exercises revolving around improving the quality of life and infrastructure of Val Verde.

This article pertains to three community workshops that the URPAVV collaborative held over a period of six months in 2004. The first and third workshops involved cognitive- and collaborative-mapping exercises. The second workshop was devoted to the collection of personal narratives from residents. The latter involved face-to-face interviews, which consisted of both open-ended and semi-structured batteries of questions, with trained bilingual researchers since the participants spoke in both English and Spanish. The interviews were then translated and transcribed.

The participant pool included male and female Latino residents from a wide age range. Representatives of URPAVV invited members of the community who were not directly affiliated with their organization to participate. By drawing from a pool outside of the organization, our goal was to diminish participant bias. It is important to point out that the focus of the research was not on the statistical testing of hypotheses but on an exploratory attempt to uncover narratives of place and the landfill, so we did not seek a random or representative sample. Our research material consisted of personal reflections, cognitive mapping, collaborative mapping, and resident interviews, as discussed below.

### *Personal Reflections*

We attempted to gain a direct insight into the experience of the place. This involved repeatedly visiting the community, taking photographs, meeting residents, and entering into the experience of the place. One of the authors has been working with residents in Val Verde for almost a decade.

### *Cognitive Mapping*

To try to access residents' cognition of the place, we engaged members of the community and asked them to conduct a cognitive-mapping exercise. In doing this, we follow the lead of pioneering work on the use of cognitive mapping as a way to bring out people's understanding of place (*e.g.*, Appleyard, *et al.*, 1964; Lynch, 1960; Milgram and Jodelet, 1976; Orleans, 1973). We then interpreted patterns in these mappings. For example, in their studies of sketched maps of Paris, Milgram and Jodelet (1976) associated salience of features of place with the consistency of inclusion in residents' maps, the prominence of sketched features (*e.g.*, their size, location of icon, boldness of line), and other criteria.

Eleven adult residents (eight females and three males) from Val Verde were asked to sketch maps of their neighborhood. Each person was provided with an 11" x 17" (28 cm x 43 cm) sheet of paper and told they would be given about 45 minutes to complete the exercise. No other prompts or cues were given. After each resident finished her sketch, she was given a chance to annotate her map with comments, and if she wanted, to provide a subjective rating on a scale of -7 to +7 to represent the positive or negative effect of the particular landmark. The entire session took about an hour and a half. The researchers subsequently listed all the landmarks that were found on the maps and prepared an aggregate list.

TABLE 1. General overview of questions asked.

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Opening Question: <i>Tell me about your thoughts (anything whatsoever) or experiences of living in Val Verde.</i>
Non-judgmental Prompts (followed by prompted responses): <i>Say anything that comes to mind, your views of what it's like to live here, things that affect you, anything.</i>
Follow-up Statements: <i>You mentioned it's all right living here ... why do you say so? Can you talk a little bit more about why you would say it's all right? Or You said there are some problems ... could you discuss them for a while? What do you experience? How do these things affect you?</i>
More Specific Questions: <i>Now I would like to hear what you feel or think regarding the problems in the community.</i>

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### ***Collaborative Mapping***

Another research artifact was a set of collaborative maps that were produced as a group exercise (in contrast to the individual sketches discussed above). The collaborative-mapping session involved gathering approximately 20 residents around a large easel and contributing ideas to be captured on the large sheet of paper. One or two community members would then draw these on the map as the rest of the group watched. Two maps were produced: one was a vision of the positive aspects of Val Verde, and a second one portrayed what the residents thought were the most pressing negative aspects. It is important to note that these maps were not the researchers' idea, but the residents'.

We conducted an interpretive analysis of the collaborative mappings. The hermeneutic approach requires first immersing one's self in the images. This then leads to finding themes reflected in the drawings — most immediately, identifying key iconic features. This also involves studying graphic elements of the drawings.

### ***Resident Interviews***

We strengthened the observations of the above mapping exercises through face-to-face interviews with the same 11 participants. The interview protocol was comprised of a semi-structured series of general questions designed to capture how the participants understand and experience their neighborhood. Interviewers were trained to engage the participant in conversation without influencing his or her responses. In fact, mention of the landfill was not initiated by the researchers but only evolved as interviewees discussed their thoughts and feelings about Val Verde. The goal of the research design was to yield insights into how residents felt about Val Verde and, more specifically, how the landfill entered into the residents' experiences. In addition, the analysis illuminates the cognitive processes people use in understanding environmental *risks*, though we deliberately set aside the strong concept of *risk*, as well as any mention of the term. Using a funnel design, the open-ended interview became more focused as it progressed (Ericsson and Simon, 1994; Morgan, *et al.*, 2002). Interviewers referred to a worksheet of prompts and directions during the interviews (see Table 1), which generally lasted up to an hour, though several exceeded that. The interviews were taped and transcribed, and Spanish portions were translated. Later on, follow-up interviews were conducted with residents who indicated a desire to share more insights. All of these were done over the phone due to logistical problems with arranging face-to-face meetings. The above methods were pilot-tested with residents at a university housing complex.

## **ANALYSIS AND DISCUSSION**

### ***Agency's Analysis***

First, we examine the official agency analysis in order to contrast this with the alternative modalities presented herein.

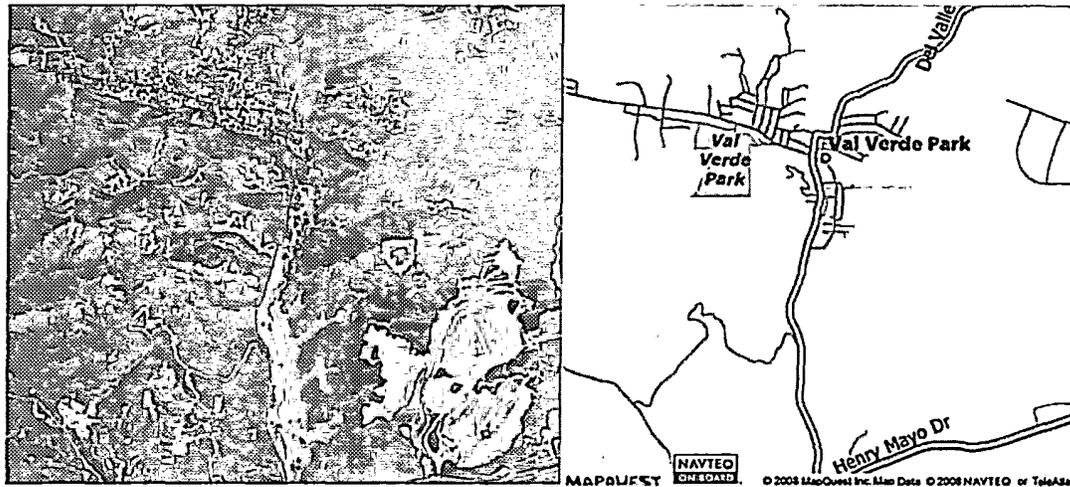


FIGURE 1. Aerial view and street map of Val Verde, California.

In the environmental impact report (EIR) for the last approved expansion plan, air-quality-related risks were dealt with in two ways. First, the impact of air toxins on the local community was estimated by calculating air toxin concentrations due to the landfill at the nearest residential area in Val Verde. The EIR concluded that the total additional cancer risk fell below the threshold risk level of  $10^{-6}$  or one in a million, representing the probability of an exposed resident developing cancer as a result of air quality. The second calculation entailed comparing total emissions of non-cancer-causing criteria pollutants with thresholds for regional-level impacts in the South Coast Air Basin. The EIR concluded that total emissions fell under the basin's threshold levels (County of Los Angeles, 1996).

We next contrast the above representation of *risk* with the community's. For the agency, *risk* is defined numerically and corresponds to a fairly specific, narrower understanding of *risk* that is limited to:

- considering concentrations of air toxins listed by the State of California (numbering almost 300 carcinogens and almost 100 toxic non-carcinogens, in contrast to the thousands of toxic air constituents identified in bioassays and epidemiological studies);
- limiting effects to only cancer and non-cancer endpoints, including birth defects and neurotoxicity (leaving out odor, nausea, asthma, allergies, and other chronic endpoints);
- using the agency thresholds as categorical decision points (*i.e.*, reducing the question to a yes/no response);
- considering aspects of *risk* in a separate, piecemeal fashion (*i.e.*, not analyzing cumulative effects); and
- most fundamentally, reducing impact to direct biochemical interactions of the landfill gases with human organs (*i.e.*, leaving out stress and stress-related impacts, anxiety, nuisance, etc.).

In contrast, our data reveal how the community understands *risk* in its Gestalt — as an experience of manifold aspects that all contribute to multiple problems associated with the landfill. It is also important that none of the problems experienced by the community fall under the categories that the EIR analyzes as *risk*. This has implications for the methodologies we employ in analyzing the experience of *risk*. In the EIR, classic risk analysis provides probabilistic estimates of *risk*. It is clear that, in order to understand *risk* as experienced by a community, we need to go beyond these standard probabilistic estimates of *risk* and employ other modalities such as ethnographic interviews and cognitive mapping. Because classic risk analysis relies exclusively on objective information (in the sense that positivist data are considered objective), we recommend an alternative and broader approach that incorporates both subjective and objective modes of risk assessment.

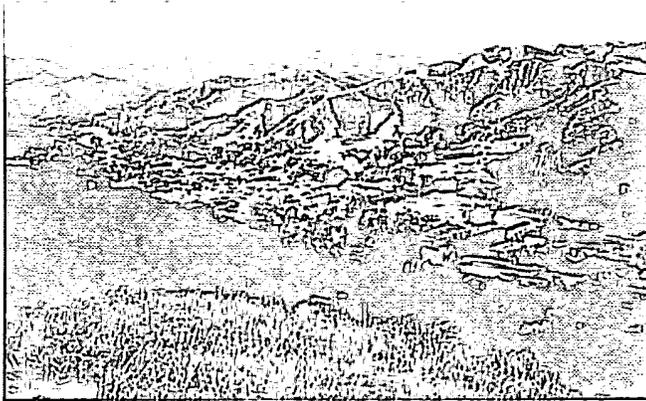


FIGURE 2. Bird's eye view of Val Verde, California.

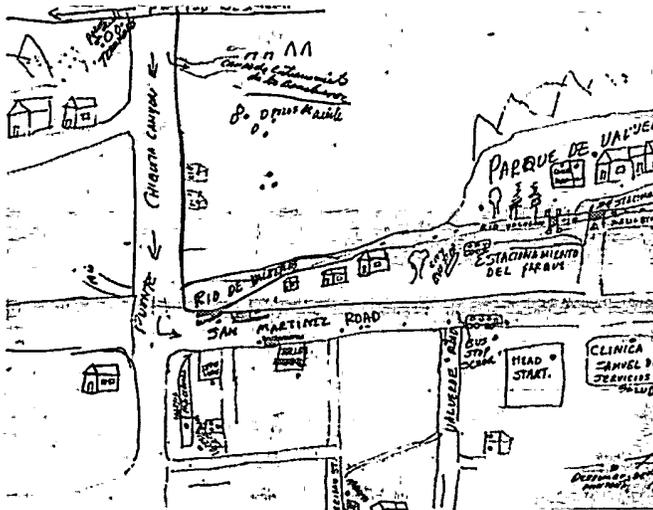


FIGURE 3. Resident's cognitive map of Val Verde, California.

town of Val Verde, strung out across the narrow canyon that extends to the northwest. The aerial view gives a striking image of how dominant a land use the landfill is. And yet, we remind ourselves, the landfill cannot be seen at all from the ground. Is it possible that the natural topography suffices to hide the landfill from the lived experience of the residents? On the other hand, if the landfill somehow affects life in Val Verde, in what way does it do so, and how is this reflected in residents' representation of the place?

### *Cognitive Mapping*

Figure 3 is one of the cognitive-mapping sketches. The landfill certainly seems to be part and parcel of most residents' cognition of the place — it appears in seven of the 11 maps. The sketches show, too, how the landfill looms large in the residents' consciousness as a dominant feature of the place, even though, at ground level, it is not even visible to them. Of course, the landfill is not the only thing that appears on the maps. Other landmarks that appear on most of the maps include the clinic, Val Verde Park, San Martinez and Chiquita Canyon Roads, and invariably, each mapmaker's home.

### *Personal Reflections*

The researchers began by simply spending time in Val Verde and drawing from their evolving impressions of the place. They also consulted several groups of graduate students regarding how they felt about the place the first time they were brought to it. For most, impressions of Val Verde begin with the entry into the town, which is through a long, narrow road that takes one by a rather colorful and dramatic series of hills. Coming from Los Angeles, the visitor is taken by the rustic color of the place. The town itself consists of loosely arranged rows of houses placed along intervals with enough randomness to bring an interesting spontaneity to the place. Most of the homes are small one- and two-bedroom wooden bungalows, many of them aging but reasonably well-kept, and the town has a gently rolling quality to it. There is an unmistakable charm to the area.

It is also important to note that one could visit the town for an entire day and not get a sense that there is a major municipal landfill nearby. The landfill itself cannot be seen from Val Verde, as it is tucked away behind a row of hills. Figure 1 shows an aerial photo and street map of the area, and Figure 2 provides a panoramic picture of the town. The landfill is on the lower right-hand portion of the map and aerial photo, bordered by the hills. Just north of these hills lies the

In many cases, the landfill is indicated somewhere near a corner of the page (e.g., upper right-hand side of Figure 3), almost as if to show how it is tucked away at the edge of their everyday world. But, inevitably, it is there on the page and, by extension, in their cognition. Note that there is no Spanish word for landfill, and in some of these maps, this landmark is indicated as *basura* (garbage) or *basurero* (garbage collector).

### Collaborative Mapping

We found the results of the group mapping sessions to be powerful, direct expressions of the residents' experience (Figures 4 and 5). We should keep in mind that these two maps were meant to be graphic embodiments of what the residents wanted to say as a group. The icons on each page were not simply contributed without reflection but were first discussed by the group. So, in a sense, the images in Figures 4 and 5 convey the shared experiences of the residents.

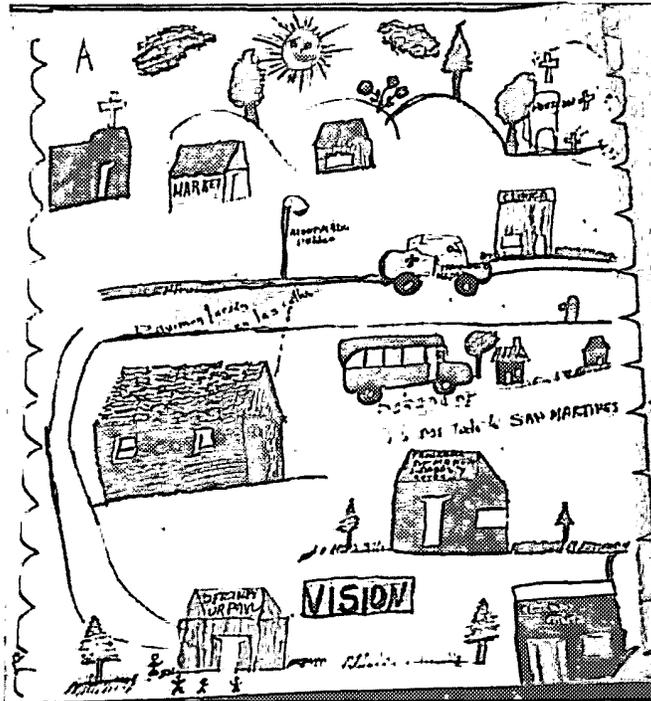


FIGURE 4. Collaborative map (A).

Taken side by side, the two maps are graphic portrayals of the dialectic of life in Val Verde. The notion of a dialectic, without attaching too much theoretical framing to the term, comes from the residents themselves, as they sought to produce two pictures, one expressing “things that needed to be fixed immediately” and the other expressing “the great things about Val Verde that others also need to know.” In Map A (Figure 4), we see a picture of coherence, where everything has its place and seems to fit. These are elements of the place that all somehow fit, even the street, which is associated with health (the clinic). The hills blend into the scene, and there is circularity to the design of the drawing, as the eye moves around it in an unbroken circle. There are small people at the bottom of the page who, though tiny, seem to be playing in the sun. The map includes good aspects of the town that could already be found in it, as well as a vision of things that the group is working to attain. Thus, we find on the same map the clinic and URPAVV office (both already there), along with the church and school (both envisioned). One of the things envisioned was a cemetery, and when this was inquired about, one of the residents explained, “This is where we have lived for so long, this is where our children were born, and this is where we would like to be buried . . . [T]his is our place, forever.” In short, Map A is a vision or representation of Home, which is a place that people have come to associate themselves with. Literally, Home is the place that they are a part of and which is a part of them. The unbroken circle of Map A reflects the circle of relationships that extend from self to neighbor to place and then back to self. There is a wholeness to the scene, as each landmark finds a place of its own, spaced evenly and comfortably across the landscape. In this scene of balance and equilibrium, each thing has a niche, so to speak.

In contrast, the negative elements of Val Verde are depicted in Map B (Figure 5). Contrast the placid circularity of Map A with the highly angular, broken scene of Map B. In contrast to the pleasant street in the previous map, neutral in its horizontal alignment, the street here cuts diagonally through the community, invasively, bringing not health but garbage trucks. The hills are intrusive. There is no balance in the scene but, instead, a dynamic tension expressed as angularity. The scene is replete with rodents, redolence, and squalor. There are people here, too, though the figures are grotesque, sharing graphic elements (the blobs of gray) with the rodents on the upper right-hand side. In contrast to the pleasant hills at the top of the page in



FIGURE 5. Collaborative map (B).

grotesque people/creatures become part of the squalor. In a sense, Map B speaks to dehumanization (a notion that will appear again in the resident interviews), where the residents are, graphically, treated almost like garbage themselves. The colonization of the community by the landfill (and, more directly, by the garbage haulers) is vividly illustrated as a stream of trucks invading the space almost like a column of tanks of some conquering army. Unlike the utopian equanimity of Map A, there is a dynamic tension in Map B, where movement and agency are associated with the trucks. The element of the grotesque is deliberate in this picture. We try to take people's sense of comfort away, says one of the group's leaders. We should note that this same person has been photographed in the past dressed as a corpse during *El Día de los Muertos* (the Day of the Dead) on November 1st, which the group uses as an occasion to protest the landfill.

It is also important to take these maps together, since that is the main intent of the residents. These maps, labeled matter of factly as Maps A and B, reflect the lived dialectic of the place. Val Verde, in fact, is both of these, but the dialectic is used to better convey the experience of the place, which cannot be captured with one simple picture. Perhaps, we can surmise, life itself is experienced here in dialectic terms. They also express the conflicted nature of life in Val Verde. The seeming equanimity of the place is broken by the abrupt reality of the landfill — yet both are part and parcel of the place.

The Gestalt of the community's lived experience is directly reflected in these artifacts, where elements of the situation are not analyzed piecemeal but, instead, are incorporated into a comprehensive picture of the entire community. What the collaborative maps are suggesting is that residents experience place as a whole, and the need to produce two maps in part represents the dialectic of life there, where the strong attractions of home and community are countered by the fear engendered by the landfill. Thus, there is a need for methodologies (such as mapping and drawings) that probe into the Gestalt of place and not just piecemeal elements (which is characteristic of the EIR).

the positive vision map, here, the mountains are everywhere and dominate the place, intruding into everything. It is an ugly scene, and the colors portray this, in contrast to the previous map. While we find a sense of coherence and completeness in Map A, in Map B, we find a disturbing pestilence. Even elements of city infrastructure, seen in the pipes (*pozos*) in the upper right-hand quadrant of the page, are broken, draining into the community, looking like garbage cans themselves. Map B also speaks of betrayal, symbolized by the figure "\$177,000," the amount of the legal settlement that should have been spent on environmental studies, and the term "*Reporte Ambiental*," a Spanish version of the term "environmental report," referring to the report that the researchers did not provide to the residents.

The members of the community and the other elements of place are all drawn in a murky gray. In fact, the only vibrant colors on the page are associated with the trash trucks — suggesting a sort of taking over of the place by these alien intruders (*clandestina*). In the scene, the

### *Resident Interviews*

The interviews began with talking about people's general impressions of Val Verde and life in it. A common feature of narratives about the place involved words such as placid, peaceful, tranquil, and pleasant. Some spoke of how everyone knew their neighbors and how Val Verde had become their home.

The interviews provide more insight into how the landfill, though not visible, dominates the landscape. The interviews, which were couched as a general discussion with residents about Val Verde, generally did not touch on the landfill until the residents brought it up themselves. In each of the interviews, the residents invariably mentioned the landfill early on in the discussion, which speaks to the presence of this otherwise invisible entity in their everyday lives. Part of its invasive presence manifests itself through an insidious odor that seeps into their very consciousness.

*When I worked you could smell the stench ... I would put vapor rub on my nose and when I would arrive over there I would blow my nose ... I would clean myself so I wouldn't smell the stench right, and still I would breathe all that ... [W]hat can I do, the air enters you, and you can feel the ammonia.*

The landfill is present, they are saying, but its presence is manifested through none other than the residents' own bodies. It is, as Casey (1993) describes, the "emplacing" power of the body to establish modal location. Presence and location are mirrored in the residents' bodily experiences, whether through the incessant cough, the invasive stench, or the feeling of nausea. Further interviews with other residents speak to the same issue:

*"There are gases. And the wind is the same ... [T]he wind is what attacks a person." "Sometimes the air blows it this way and sometimes the other way, the wind is what dominates everything." "[N]ow we no longer smell those strong odors. Although sometimes it still does come at night like waves sometimes. Because the wind is like that."*

In these narratives, the landfill manifests itself as the "wind," which, especially in the last quote, is likened to the inexorable, overpowering ocean. This notion of the wind that invades everything and which one cannot escape underscores the tragic element of these narratives. By tragic, we mean, most specifically, the dramatic form in which the protagonists attempt to defy what they see as their (usually unfortunate) fate, yet in the end, succumb to it anyway. The inevitability of fate also carries with it the futility of struggle, as expressed in the following:

*"But ever since the landfill came, all this started but ... what can we do?" "Well, for my part I feel bad, because there are many children (who have gotten sick) and we don't have the means to cure them." "And what can we do in that case? If they are like that, like I said, they have the power ... [O]ne feels incapable of not being able to do that."*

These narratives speak to a profound helplessness. Feelings of betrayal are part and parcel of this experience, and most of the interviews recounted instances when they felt lied to. One vivid account portrayed a county official stuffing her face with lunch while scolding the community group about how they should be grateful that the landfill brought development to Val Verde. The sense of dehumanization is even more graphically portrayed in statements like the following:

*But in that company lots of people work there, like more than 500 persons every day, every day, every day. [A]nd we were dragging ourselves in the dirt in the mud when it was raining, that's how they put one in to work. One doesn't escape ... We suffered a lot in our work, and badly paid.*

In the statement above, the speaker gives a metaphorical account of how community members are treated, literally, like beasts of burden. In a sense, this echoes images in the collaborative mapping that portray residents as creature-like figures in a thoroughly grotesque representation (Map B). Location, environmental insult, and injustice are all played out in and through the person's body. The most moving and painfully tragic account of helplessness was recounted by one longtime resident who spoke about one fateful day, years ago:

*My granddaughter. She died at a year and a half. And well, poor thing she already talked, very funny and affectionate, and she loved us very much. And well, that day I remember that a woman passed by,*

*it was right in the middle of the day, the sun was out ... . And since the house has like [inaudible], the little girl stopped there in front, and in that little while a strong wind comes. And like I said, I grabbed the little girl and I reclined her in my stomach, and I told her, "Child let's go inside because this wind is too strong." And it smelled bad. So then we went inside. Well in a few days the little girl started being sick ... . Yes my granddaughter. And she couldn't save herself.*

The last part of the quote ("she couldn't save herself") captures, in the deepest way, the tragic narrative that was common to many of the interviews.

Again, we observe that these narratives exhibit a dialectic of sorts, mirroring that of Maps A and B mentioned in the previous section. One must keep in mind that, despite the years of frustration and felt betrayal, the members of URPAVV had a resolve to stay in Val Verde even if they had the means to leave. As one resident put it:

*One of the good things about Val Verde is that my children live in peace. I have some neighbors that have really helped me out when we had problems.*

Do the residents employ images or concepts that resemble the policy model of *risk*? One common way that the landfill was spoken of was as a "contamination" ("*contaminación*") and, in fact, a ubiquitous kind of contamination: "It doesn't stop being a problem ... . [T]he wind is what dominates everything," and "The wind, the water, is what moves the filth." They also spoke of the landfill as a source of "infection." To a lesser degree, some also associated the landfill with a constant noise.

This contrasts with the classic notion of *risk*, which posits a probability of injury. Instead, for Val Verde residents, the landfill is a constant — it shows up in cognitive maps drawn of the place, and it maintains a constant presence in the daily lives of the residents. The effects of the landfill are not probabilistic — they are always there, manifested in residents' everyday health and in the very way they are treated. Associating the landfill with the wind, it is what "dominates everything." This brings us to the second common way that residents spoke of the landfill, which is in terms of prejudice ("*prejuicio*" or, more commonly, the verb "*prejudicar*," to injure). That is, residents associated the landfill with the way they felt they were treated by authorities, the landfill operator, and others: "Every day, when we go out for a walk, we encounter the odor from the landfill that is injuring the area."

The landfill is also associated with a nagging fear on the part of the residents, some of whom "feel a desperation, they are scared and, when they have that (panic attacks), they feel alone, sometimes, their whole brain hurts" — again, registering the landfill not in terms of the probability of a future consequence, but in terms of presence. Only two residents, in fact, ever used the word "*riesgo*" ("*risk*") in the interviews.

Another way that the residents' experience diverges from the rationalistic policy model of *risk* is that, while the latter depends on the spatial location of the landfill in relation to the community, the presence of the landfill does not register in these spatial-locational terms. Rather, the landfill, like the wind, surrounds the residents and dominates everything. It is akin to a global locality that the phenomenological concept of primal depth produces, as the wind and by extension the landfill are, in a sense, everywhere at all times (Merleau-Ponty, 1964; Whitehead, 1953). Rather, the landfill's presence registers along the here-there dimension (Casey, 1993; Lakoff and Johnson, 1980), where, whether due to nature ("the wind") or intentionality ("going out for a walk"), the landfill invades the here. These notions are, in turn, related to transactional models of person-place interactions, which view places in terms of their social, physical, or locational affordances, rather than simply in terms of their mere location (Saegert and Winkel, 1990; Stokols, 1981).

Lastly, the classic notion of *risk* involves translating the hazard to a measure that one then weighs or values according to some cardinal scale. This is missing from the residents' narratives. When asked whether they would consider receiving monetary compensation to make up for the effect of the landfill or to allow them to move out of Val Verde, only one resident said they would consider compensation. The landfill needed to be closed because "it is just not right." As one resident said, "No, well even if they increase the amount [of

compensation], that does not help me at all.” Phrases like “it is not right” convey a moral mode of reasoning, not a utilitarian one (Forrester, 1982).

## CONCLUSION: POLICY LINKAGES

We began with a note about how policy is dominated by a reductionistic, probability-based model of environmental *risk*. This leads to policy responses that are fairly limited as a result, such as reducing the conversation to technological measures to decrease expert-measured estimates of *risk* below regulatory thresholds. In contrast, the experience of life near the landfill is multidimensional and inherently more complex than the classic model. As shown in the sketches and narratives, the landfill is registered not as a positivist measure of hazard but in terms of presence and effects that manifest daily in the residents’ own bodies. The issue of the landfill is understood in terms that are not primarily technological, but are, rather, relational (*i.e.*, the landfill is viewed through its presence as a bad neighbor and the unjust manner in which residents feel they have been treated). The technological measures employed by the agencies and the landfill operator do nothing to address the moral dimension in which residents regard the landfill. Environmental policy analyses should focus on the modes by which residents understand the landfill, instead of on only the narrow, classic (probabilistic) measure of *risk*. As a research objective, we need to better describe such phenomena in relational terms (Lejano, 2008).

The contrast in the ways *risk* is analyzed by the agency and the community underlies the sense of injustice felt by the latter. The community members’ experiences are ignored by the agency analysis. Whereas the objective measures employed in the EIR all suggest no *risks*, community members report a host of impacts ranging from direct health effects (*e.g.*, headaches, nausea) to equally important experiences of anxiety. Recent epidemiological evidence linking stress to traditional health outcomes like cardiovascular disease and immunodeficiency only underscores the gravity of these subjective experiences. In short, classic risk analysis does not adequately represent the lived experience of *risk*.

The sense of alienation is compounded by exclusion from the agency process. The following were among the problems cited by the URPAVV members:

- non-availability of EIRs and other documents in Spanish,
- the fact that, for whatever reason, URPAVV did not receive a number of air-quality and water-quality monitoring reports, and
- the lack of consultation with local residents.

But perhaps the most fundamental source of alienation among community members can be traced to the agency’s official statement of findings “that the remaining unavoidable environmental effects of the project have been reduced to the extent possible and to an acceptable level and are outweighed by specific, social, economic and environmental benefits of the project” (County of Los Angeles, 1997:1). Essentially, their ultimate finding is that problems faced by the residents of Val Verde are outweighed by the greater good.

The last point raises the question of whether or not agency analyses can include residents’ viewpoints and their subjective experiences. Should agency analysts employ methods like interviews, focus groups, and surveys?

Our foremost conviction is that such phenomenological considerations have important implications for policy. In the case of Val Verde, analyses such as those conducted by the agencies should consider the multiple ways that the landfill impacts life around it, instead of just concentrating on the measurable toxic, volatile chemicals that are emitted from the landfill. The analysis should consider ways that residents are treated in agency forums. As Map B of the collaborative-mapping session indicates, the way that all agency proceedings regarding the landfill have been crammed into one large, technical report is a betrayal of the community. Rather, assessments of environmental quality should consider the residents’ feelings. In fact, as our research has endeavored to show, environmental policy analyses should include the residents’ own narratives, expressed in their own words. These narratives should be a part of reports, discussions, and agency hearings. Similarly, there is as much need to show sketches (Maps A and B) from the collaborative-

mapping sessions in agency planning documents as the expert-produced topographic and other maps. If indeed there are differing cultural systems for understanding an issue such as *risk*, then there is a need to validate these different systems through policy (e.g., see Brenot, *et al.*, 1998; Rayner, 1992).

In terms of policy responses, there is a need to address how alien the landfill and the trash trucks appear to the community. The dominance of Chiquita Canyon Road, which brings many of these trucks to the landfill, looms large in the everyday experience (and sketches) of the residents. Environmental remediation measures should include the phaseout of the landfill. In the near term, these measures should include strategies for reducing the negative impact of the truck route on the community, such as rerouting truck traffic, utilizing less polluting (low-emission) trucks, or considering changes in hours of operation. The ubiquitous nature of malodor from the landfill is an important consideration that does not appear in expert risk assessments (which mainly consider toxic air emissions of volatile carcinogens). Most importantly, the squalor of the landfill should be considered in relation to what residents value about the community — its tranquility and sense of wholeness, which the landfill violates. Along with mitigating effects of the landfill, agencies should consider other needs of the community, as expressed in Map A of the collaborative-mapping sessions.

The problem is not when the situation matches the agency's objective representation of *risk* so that the objective measures clearly point to significant impacts. Instead, the main question pertains to those gray areas where these objective measures suggest little impact, yet the lived experience of the residents suggests a larger impact. In these latter cases, perhaps there is a need to allow these subjective evaluations to provide guidance to decision-makers. Distances to noxious land uses might be increased to a point that these subjective impacts would no longer be felt. New methods of inquiry (e.g., focus groups) might be put to use in these gray areas. The mere acknowledgment of these subjective experiences and documentation in official reports and EIRs would be an important policy reform.

So, the first recommendation is for formal agency procedures to more explicitly incorporate nonobjective aspects of community experience. This leads directly to a suggestion to utilize nontraditional instruments for analysis. In this research, we have demonstrated how some of these instruments, which have been extant for a long time, could be put to novel use in environmental impact assessment. This requires that we acknowledge these instruments are as rigorous and formalizable as those used in the physical sciences (such as traditional risk analysis). This is in keeping with a realization that complex phenomena, such as community *risk*, require an openness to multiple ways of knowing (see Schneider and Ingram, 2007) and transdisciplinarity (Stokols, 2006).

The risk-perception literature shares our fundamental premise that perceived *risk* deviates systematically from measured *risk* (e.g., Fischhoff, *et al.*, 1978). However, we are trying to say something altogether different. Unlike the risk-perception literature, which represents perceived *risk* in the classic form of probabilities, we look at the different qualitative ways that residents understand *risk*. Part of this is to understand *risk* not merely as a measure but as a feature of the Gestalt of place — this is the reason why we elicit sketches and interviews from the residents instead of probabilities. The gap between perceived and measured *risk* that we are concerned with is not merely a matter of degree; it is fundamentally different in nature. We also depart from the risk-perception literature in attempting to view community representations of *risk*, as opposed to the classic analytic focus on individual perception of *risk*, which is why community vision maps are so important to us. The use of cognitive maps and community visioning to capture the lived experience of *risk* is, in fact, a fundamental addition to the literature. Thus, we propose the formal inclusion of analytic instruments such as those used in this research in agency environmental impact assessment processes. If the maps and sketches provide a glimpse of what really matters to community members, then this material should be directly relevant to community and agency decision-making practices.

Lastly, the investigation reveals how present efforts to contain the landfill's environmental impacts have done nothing to reduce these to levels that are below community members' thresholds of significance. The standards of significance that residents employ are more complex, having to do with trust, a sense of security, and a regard for home, which the continued presence of the landfill threatens. The findings from this research contradict expert analyses of the landfill, which are found in the EIR for the landfill expansion project and the quarterly environmental monitoring reports. Despite all the agencies' assurances of environ-

mental controls and a legally mandated settlement agreement, the landfill continues to disrupt the everyday life of Val Verde residents.

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## Letter No. 22

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### Response to Comment No. 22-1

Please see Topical Response #21, Public Health.

### Response to Comment No. 22-2

Please see the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, as well as Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health.

### Response to Comment No. 22-3

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, as well as Topical Response #17, Odor.

### Response to Comment No. 22-4

Please see Topical Response #9, Environmental Justice.



GAIL FARBER  
CHAIR

MARGARET CLARK  
VICE-CHAIR

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August 25, 2014

Ms. Iris Chi  
County of Los Angeles Department of Regional Planning  
Zoning Permits North Section, Room 1348  
320 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Chi:

**COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT  
CHIQUITA CANYON LANDFILL  
MASTER PLAN REVISION PROJECT NO.: R2004-00559-(5)**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Chiquita Canyon Landfill Master Plan Revision, Project No. R2004-00559-(5), which was released for public review on July 10, 2014.

The proposed Project, among other things, entails increasing the permitted daily disposal tonnage from 6,000 to 12,000 tons per day; increasing the disposal footprint laterally by 143 acres; and increasing the maximum elevation by 143 feet. As indicated in the DEIR, this would extend the existing Chiquita Canyon Landfill's life by additional 21 to 38 years, depending on the amount of the daily disposal rate. The Project also provides for the development of an on-site household hazardous facility and an open mixed organics composting operation while setting-aside a portion of the subject site for possible development of a conversion technology facility, sometime in the future.

As provided by Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County. Consistent with these responsibilities and to ensure a coordinated,

cost-effective, and environmentally-sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a Countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

Accordingly, the Task Force has reviewed the DEIR for the proposed Project and offers the following comments:

**Project Need:**

<p><b>Need for Landfill Capacity:</b></p> <p>In-depth discussions substantiating the need for expansion of the existing Chiquita Canyon Landfill (Landfill) including the following key points need to be provided:</p> <ul style="list-style-type: none"> <li>• Identify jurisdictions that currently utilize the Landfill for disposal of municipal solid waste (MSW) as well as jurisdictions to be served by the Project.</li> </ul>	23-1
<ul style="list-style-type: none"> <li>• Discuss whether any out-of-County waste will be accepted at the Landfill.</li> </ul>	23-2
<ul style="list-style-type: none"> <li>• Discuss the impacts of the full development of the Waste-by-Rail System to the Mesquite Regional Landfill by the County Sanitation Districts of the Los Angeles County on the proposed Landfill expansion.</li> </ul>	23-3
<ul style="list-style-type: none"> <li>• Address impacts from the following 2014 legislative proposals and statutes currently in effect on the need for additional landfill capacity, including, but not limited, to the following:           <ul style="list-style-type: none"> <li>○ Assembly Bill (AB) 32 (the California Global Warming Solution Act of 2006 [Act]) – Mandatory commercial recycling to achieve a reduction in greenhouse gas emissions of five million metric tons of carbon dioxide (CO<sub>2</sub>) equivalents.</li> <li>○ AB 32 [Act] – Mandatory commercial organic waste recycling program if the Legislature fails to pass legislation in 2014 that would accomplish the same.</li> <li>○ AB 341 (2011) – State legislative mandated policy goal of achieving a 75-percent recycling rate by the year 2020.</li> </ul> </li> </ul>	23-4

- AB 1594 (2014) – Beginning January 1, 2020, using green waste as alternative daily cover (ADC) would no longer constitute diversion but rather be considered disposal for purposes of AB 939. Additionally, it prohibits disposal of green material by a jurisdiction that is not in compliance with AB 939 diversion mandates
- AB 1826 – Starting April 1, 2016, it would require businesses, governmental entities and multi-family residential of five units and more that generate certain thresholds of organic waste per week to implement a mandatory commercial organic waste recycling program consistent with the requirements of the bill and the host jurisdiction. Failure of a jurisdiction (city/county) to monitor and enforce the implementation of a commercial organic waste recycling program by businesses within the said city/county may subject the jurisdiction to a daily penalty of \$10,000 even if the jurisdiction is in full compliance with the AB 939 diversion mandates. The goal of the legislation is to reduce the amount of organic waste being disposed in landfills and transformation facilities in 2014 by 50 percent by the year 2020.
- Senate Bill 498 – Revises the definition of “biomass conversion” to mean the production of heat, fuel, or electricity by the controlled combustion, or the use of other noncombustion thermal conversion technologies on biomass materials.

23-4  
cont'd

It should be noted that the Legislature has approved AB 1594, AB 1826, and SB 498 and the bills need to be signed by the Governor in order for them to take effect on January 1, 2015.

**Need for Development of Composting, Anaerobic Digestion, and Conversion Technology Capacity**

Provide in-depth discussions and analysis for on-site development of facilities using the above processes in conjunction with the full and/or partial development of the Landfill expansion.

23-5

### **Chapter 1.0 (Introduction)**

- **Federal, State, and Local Approvals, Section 1.5.2 (Pg. 1-12).** Table 1-3 does not specify the associated water permits under “State Water Resources Control Board” and “RWQCB,” and should be revised to include the following:
  - Stormwater Pollution Prevention Plan (SWPPP) and Stormwater Monitoring Program (SWMP) under “State Water Resources Control Board.”
  - National Pollutant Discharge Elimination System (NPDES) under “RWQCB”

23-6

- **County of Los Angeles Approvals, Section 1.5.3 (Pg. 1-12).** Include the following in addition to the required permits and approvals listed in this Section:

Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force

- Finding of Conformance with the Los Angeles County Countywide Siting Element

Siting Criteria—Incorporate a discussion regarding how the proposed Project would meet the siting criteria specified in the June 1997 Los Angeles County Countywide Siting Element, Volume I-The Element, Chapter 6-Facility Siting Criteria.

23-7

### **Chapter 2.0 (Project Description)**

- **Lateral Extension of the Waste Footprint and Increased Maximum Elevation, Section 2.2.2 (Pg. 2-5).** The current CUP has a maximum permitted elevation of 1,430 feet, as shown in the approved Exhibit “A” Site Plan. Revise the third sentence under this Section to read, “The Proposed Project also will increase the permitted elevation of the landfill by 143 feet to a maximum elevation of 1,573 feet, including the final cover.”

23-8

- **Wastes to be Received, Section 2.2.4 (Pg. 2-6).** Clarify whether sludge and sludge components (or biosolids) are proposed to be prohibited from being accepted as part of the Project. Also, identify any other materials (e.g. friable/non-friable asbestos, radioactive and liquid waste) that are proposed to be prohibited from being accepted at the Landfill.

23-9

<ul style="list-style-type: none"><li>• <b>Materials Diverted from Waste Disposal and Typical Beneficial Reuse at CCL, Table 2-2 (Pg. 2-15).</b> If a “Mixed Organics” composting facility will be part of the Project, pre- and post-consumer food waste should be listed under the “Material Type Diverted from Waste Disposal” column in Table 2-2. Also, the description under the “Beneficial Reuse at CCL” column for pre- and post-consumer food waste, as well as Shredded Curbside Green Waste, should include “Used as feedstock for the ‘Mixed Organics’ composting facility.” Also, see comments under the Project Need Section.</li></ul>	23-10
<ul style="list-style-type: none"><li>• <b>Materials to be Diverted from Waste Disposal, Section 2.2.5 (Pg. 2-15).</b> Describe whether or not the 20,505 cubic yards per day of diverted materials analyzed include food waste, and whether this value is in addition to the 12,000 tons per day disposal limit. Also, see comments under the Project Need Section.</li></ul>	23-11
<ul style="list-style-type: none"><li>• <b>Load Checking and Waste Screening, Section 2.2.7.2 (Pg. 2-16).</b> Provide a description on how radioactive waste and odiferous loads will be checked and screened, and what measures will be implemented when such wastes or loads are identified.</li></ul>	23-12
<ul style="list-style-type: none"><li>• <b>Hours of Operation, Section 2.2.7.4 (Pg. 2-17).</b> According to <b>Section 2.2.10 Household Hazardous Waste Facility</b>, a HHW facility will be constructed on site. Indicate the operating days and hours of the HHW facility in this Section.</li></ul>	23-13
<ul style="list-style-type: none"><li>• <b>Disposal and Cover Procedures, Section 2.2.7.7 (Pg. 2-18).</b> Discuss whether the Landfill will continue the practice of removing or peeling back the daily cover at the beginning of each operation day. If such practice is proposed please indicate any potential impacts such as those pertaining to odor, vector and other quality of life issues as well as potential mitigating measures to address possible negative impacts.</li></ul>	23-14
<ul style="list-style-type: none"><li>• <b>Sewage and Water, Section 2.2.7.8 (Pg. 2-18).</b> Address the adequacy of the water supply to accommodate dust control and irrigation even after the Newhall Land and Farming Projects are developed. If water supply is inadequate, identify measures to mitigate any potential shortage in water supply to support landfill operations.</li></ul>	23-15
<ul style="list-style-type: none"><li>• <b>Traffic, Section 2.2.7.9 (Pg. 2-19 to 2-21).</b> Identify the source of traffic that would be considered “Other” outbound traffic in Tables 2-3 to 2-5. Clarify whether the outbound trucks include those hauling leachate, household hazardous waste from the HHW facility, compost materials, and comingled recyclables.</li></ul>	23-16

<ul style="list-style-type: none"><li>• <b>Excavation, Section 2.2.8.1 (Pg. 2-21).</b> Specify the locations of any potential soil stockpile areas including the duration of the stockpiles at those locations.</li></ul>	23-17
<ul style="list-style-type: none"><li>• <b>Excavation, Section 2.2.8.1 (Pg. 2-22).</b> Revise the reference in the last paragraph to reflect the correct reference regarding soil quantities.</li></ul>	23-18
<ul style="list-style-type: none"><li>• <b>Leachate Monitoring, Section 2.2.9.3 (Pg. 2-33).</b> Indicate whether there are any plans to install a leachate treatment facility onsite. If such a facility is planned, provide detailed information including site location, facility capacity, and any associated structures for storing treated leachate for beneficial use.</li></ul>	23-19
<ul style="list-style-type: none"><li>• <b>Nuisance and Health Hazard Monitoring, Odor, Section 2.2.9.6 (Pg. 2-35).</b> In concert with the Section 11.02.300 (E) of Title 11 of the Los Angeles County Code, elaborate on measures to prevent nuisances due to odors emanating from the Landfill including those related to the working face, leachate, landfill gas control system, and "Mixed Organics" composting operations. If the removal or peeling back of daily cover prior to placing waste on each operating day is being proposed discuss how odors will be managed and contained.</li></ul>	23-20
<ul style="list-style-type: none"><li>• <b>Household Hazardous Waste Facility, Section 2.2.10 (Pg. 2-41).</b> Indicate the duration the materials collected at the HHW facility are expected to be stored on-site, as well as the frequency of delivery of the materials, and mitigation measures to ensure the health and safety of the surrounding residents and staff.</li></ul>	23-21
<ul style="list-style-type: none"><li>• <b>Mixed Organics Composting Facility, Section 2.2.11 (Pg. 2-42).</b> In accordance with California Code of Regulations, Title 14, § 17863.4, "All compostable material handling operations and facilities shall prepare, implement and maintain a site-specific odor impact minimization plan. A complete plan shall be submitted to the [Enforcement Agency] with the [Enforcement Agency] Notification or permitted application." Accordingly, describe the preparation and submittal of an Odor Impact Minimization Plan (OIMP) to the appropriate Local Enforcement Agency for review and approval. In addition, consistent with Title 11 of the Los Angeles County Code, Section 11.02.300 (E), the OIMP also needs to be submitted to the Los Angeles County Health Officer (the County Department of Public Health) for review and approval.</li></ul>	23-22
<b><u>Chapter 3.0 General Setting and Resource Area Analysis</u></b>	
<ul style="list-style-type: none"><li>• <b>Cumulative Impacts, Section 3.2.9 (Pg. 3-4).</b> Table 3-1, needs to include additional information regarding the proposed residential developments in the vicinity of the Landfill, including the distance from the disposal footprint to the</li></ul>	23-23

nearest enclosed structures. One of the siting criterion contained in the County of Los Angeles Countywide Siting Element, which was approved by a majority of the cities containing a majority of the incorporated population, followed by the County Board of Supervisors, and CalRecycle in 1998, prohibits construction of buildings or structure on or within 1,000 feet of a land disposal facility which contains decomposable materials/waste unless the facility is isolated by an approved natural or manmade protective system. Furthermore, as a point of reference, the CUP for the Puente Hills Landfill, when in effect, contained a requirement for the disposal footprint to be at least 2,000 feet away from the residential community.

23-23  
cont'd

#### **Chapter 4.0 Land Use**

- **Planned Surrounding Land Uses, Section 4.5.3 (Pg. 4-4).** Provide additional analyses of some of the major residential developments within the vicinity of the proposed Project, including but not limited to the Newhall Land and Farming residential developments, which consists of approximately 7,200 units. It is imperative that the DEIR acknowledges all existing and proposed residential, educational, and immobile population developments that may be impacted by the proposed Project, and measures to protect public health and safety, and the environment.

23-24

- **Potential Impacts, Mitigation Measures, Significant After Mitigation, and Cumulative Impacts; Sections 4.6 to 4.9 (Pg. 4-4 to 4-6).** Update the information in Sections 4.6 to 4.9 to include any potential impacts and associated mitigation measures for the proposed Project. If these impacts and mitigation measures are further discussed in other portions of the DEIR, please include references to those chapters.

23-25

#### **Chapter 5.0 Geology and Hydrogeology**

- According the DEIR, there is potential for debris flow to encroach outside of the Landfill property. Please provide additional analysis to demonstrate the adequacy of the proposed mitigation measures to prevent any potential encroachments onto the proposed residential developments to the west and south of the Landfill property.

23-26

#### **Chapter 6.0 Surface Water Drainage**

- According the DEIR, there is also potential for mud flow to affect operations onsite as well as outside of the Landfill property. Provide additional analyses to

23-27

demonstrate the adequacy of the sedimentation basins at the Landfill to accommodate any increases in onsite water runoff to prevent any releases to nearby properties and existing flood plains in the vicinity of the Landfill property.	23-27 cont'd
<b><u>Chapter 11.0 Air Quality</u></b>	
<ul style="list-style-type: none"><li>Analyses contained in this Chapter need to be consistent with the AB 32 Scoping Plan Update which was approved by the Air Resources board on May 22, 2014.</li></ul>	23-28
<ul style="list-style-type: none"><li><b>Criteria Pollutant Emission Impacts, Section 11.9.2.1 (Pg. 11-37).</b> According to the DEIR, impacts to air quality are significant and unavoidable due to water availability concerns for irrigation and dust control. However, discussions in the Water Supply, Section 14.5.2.5 (Pg. 14-6) of the DEIR concluded there is sufficient amount of water that can be used for dust control and irrigation for the Project. The DEIR needs to clarify this discrepancy.</li></ul>	23-29
<ul style="list-style-type: none"><li><b>Operation Impacts, Section 11.6.3.2 (Pg. 11-31).</b> Airborne particulate matters may be a substantial health risk to communities in the vicinity of the Landfill. Therefore, the DEIR needs to provide detailed analysis regarding the effects of wind direction and airborne particulate matters associated with operations of the Landfill and the open Mixed Organics Composting Facility. The proposed increase in elevation in combination with prevailing wind patterns may result in particulate matters being blown into existing or proposed residential, educational, and immobile population developments.</li></ul>	23-30
<ul style="list-style-type: none"><li><b>Operation Impacts, Section 11.6.3.2 (Pg. 11-31).</b> Provide additional discussions and analyses regarding any odor issues the Project may create as a result of the proposed increase in elevation and open Mixed Organics Composting Facility. If the Landfill operates at higher elevations there may be greater potential for odors to travel offsite into nearby communities.</li></ul>	23-31
<ul style="list-style-type: none"><li><b>Operation Impacts, Section 11.6.3.2 (Pg. 11-31).</b> Include additional analyses regarding any potential impacts associated with the operation of the proposed "Mixed Organics" composting operation at the Landfill, and provide any mitigation measures if found to have a significant impact.</li></ul>	23-32
<b><u>Chapter 12.0 Greenhouse Gas Emission and Climate Change</u></b>	
<ul style="list-style-type: none"><li>The analysis in this Chapter may need to be updated to be consistent with the AB 32 Scoping Plan Update which was approved by the Air Resources Board on May 22, 2014.</li></ul>	23-33

Ms. Iris Chi  
August 25, 2014  
Page 9

**Chapter 15.0 Visual Resources**

- Potential impacts to Visual Resources may be considered significant and unavoidable due to the proposed Newhall Land and Farming residential developments, of which 7,200 units will be constructed immediately west and south of the landfill, respectively. Mitigation measures should be proposed to minimize the view of the Landfill and/or Mixed Organics Composting operation from these future residential developments.

23-34

If you have any questions, please contact Mr. Mike Mohajer of the Task Force at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or (909) 592-1147.

Sincerely,

*Margaret Clark*

Margaret Clark, Vice Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Mayor Pro Tem, City of Rosemead

KM:fm

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cc: Each Member of the County of Los Angeles Regional Planning Commission  
County of Los Angeles Department of Regional Planning (Richard Bruckner)  
Waste Connections, Inc. (Mike Dean, District Manager)  
Each Member of the Los Angeles County Integrated Waste Management Task Force  
Each Member of the Facility & Planning Review Subcommittee

# Letter No. 23

Margaret Clark  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force  
900 South Fremont Ave.  
Alhambra, CA 91803-1331

## Response to Comment No. 23-1

Please see Topical Response #24, Source of Waste/Importation of Out-of-County Waste.

## Response to Comment No. 23-2

Please see Topical Response #24, Source of Waste/Importation of Out-of-County Waste.

## Response to Comment No. 23-3

Please see Topical Response #18 for a discussion of Project Alternatives.

## Response to Comment No. 23-4

Please see Topical Response #19 for a discussion of Project Need.

## Response to Comment No. 23-5

Please see Topical Response #3, Composting Facility and Conversion Technology.

## Response to Comment No. 23-6

Please see Final EIR Table 1-9 for revisions as suggested.

## Response to Comment No. 23-7

Please see Final EIR Section 1.9.3 for revisions as suggested.

## Response to Comment No. 23-8

Please see Final EIR Section 2.2.2 for this revision.

## Response to Comment No. 23-9

Sludge will be prohibited from disposal at CCL under a new Conditional Use Permit (CUP). Please see Topical Response #29a for a discussion of Wastes to be Disposed.

## Response to Comment No. 23-10

Please see Topical Response #28, Waste Diverted, for a discussion of pre- and post-consumer food waste.

## Response to Comment No. 23-11

Please see Topical Response #28, Waste Diverted, for a discussion of how food waste is addressed in the EIR.

## Response to Comment No. 23-12

Please see Topical Response #29b, Waste Screening and Acceptance Program.

## Response to Comment No. 23-13

See Topical Response #13 for a discussion of the Household Hazardous Waste Facility (HHWF).

General hours of operation for the HHWF are described in Section 2.2.9 of the Final EIR and in Topical Response #13. The HHWF may be operated by Los Angeles County or a third party selected by the County; exact days and hours of operation will be set by the County.

## Response to Comment No. 23-14

Please see revised Chapter 2, Project Description, in the Partially Recirculated Draft EIR for an updated discussion of Proposed Project Earthwork. Specifically, see Table 2-5, Estimated Proposed Project Earthwork. As currently planned, the proposed excavation quantity balances the landfill soil requirements.

## Response to Comment No. 23-15

Section 2.2.7.8 of the Original Draft EIR states: "when the Newhall Ranch Project is developed, the irrigation well on Newhall Ranch that currently supplies the landfill will be removed. At that time, CCL will begin using the water supply line north of the landfill, which is connected to Valencia Water Company's system, for both construction and routine operation."

Original Draft EIR Chapter 14, Public Services and Utilities, describes the potential water impacts associated with the project. That discussion references the Water Supply Assessment prepared for the Proposed Project and confirms that there is adequate water available to serve the Project. Also see Topical Response #23c, Water Supply, for a discussion of the Water Supply Assessment, and Appendix J of the Final EIR for an updated Water Supply Assessment for the Proposed Project.

## Response to Comment No. 23-16

Please see EIR section 2.2.6.11, Traffic, for updated traffic tables. In addition, please see Topical Response #25 for a discussion of Traffic.

## Response to Comment No. 23-17

Soil stockpiling could occur onsite anywhere within the limit of disturbance shown on Figure 2-5, Proposed Project Limits, of the Final EIR. The duration of any specific stockpile is unknown at this time, depending on timing of construction, future legislation, etc.

## Response to Comment No. 23-18

Please see revised Chapter 2, Project Description, in the Partially Recirculated Draft EIR for an updated discussion of Proposed Project Earthwork. Specifically, see Table 2-5, Estimated Proposed Project Earthwork. As currently planned, the proposed excavation quantity balances the landfill soil requirements.

## Response to Comment No. 23-19

Please see Topical Response #10, Environmental Monitoring for a discussion of leachate monitoring and beneficial use.

## Response to Comment No. 23-20

Section 11.02.330(E) of the County Code is a definitional section, and Title 11 generally governs a variety of health and safety issues. Measures to reduce odors are set forth in the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR. Also see Topical Response #17, Odor.

As standard operating procedure at CCL, a portion of the prior day's soil cover, the portion that can be reused, is peeled back and reserved for reuse. This peeling back occurs immediately before fresh waste is placed in the same location. The procedures and exceptions for peeling back the soil cover will be included in the Odor Impact Minimization Plan prepared for the Proposed Project (see Topical Response #17, Odor).

## Response to Comment No. 23-21

See Topical Response #13 for a discussion of the Household Hazardous Waste Facility.

## Response to Comment No. 23-22

Please see Chapter 11, Air Quality, of the Final EIR, which includes an Odor Impact Minimization Plan as a mitigation measure for a mixed organics processing/compost facility at CCL. Please also see Topical Response #3, Composting Facility and Conversion Technology.

## Response to Comment No. 23-23

Please see Topical Response #7 for a discussion of Cumulative Impacts.

For a discussion of compatibility of land uses, please see Topical Response #15, Land Use.

## Response to Comment No. 23-24

The Original Draft EIR, in Chapter 3, identified cumulative projects to be considered in conjunction with the Proposed Project, and each of the resource areas in the Original Draft EIR and Partially Recirculated Draft EIR addressed potential cumulative impacts. Chapter 4, Land Use, of the Final EIR has been revised to direct readers to these areas of discussion in the EIR. Please also see Topical Response #7 for a discussion of Cumulative Impacts and Topical Response #15 for a discussion of Land Use.

## Response to Comment No. 23-25

Each of the resource area discussions in Draft EIR Chapters 5 through 15 addresses potential impacts and associated mitigation measures for the Proposed Project. Additional discussion has also been added to Chapter 4, Land Use, of the Final EIR, to direct the reader to the sections of the EIR that address those potential impacts.

## Response to Comment No. 23-26

The Original Draft EIR Chapter 5, Geology and Hydrology, Section 5.7, describes the potential for debris flow or mudflow within the natural drainages and slopes along the north side of the future entrance road and identifies Mitigation Measure GH-1 to control any debris flow. As designed and engineered, the Proposed Project does not include the potential for debris flow to encroach outside of the landfill property.

## Response to Comment No. 23-27

The Original Draft EIR Chapter 6, Surface Water Drainage, Section 6.7.2.7, describes the potential for mudflow. The terms debris flow and mudflow are used interchangeably, and Mitigation Measure GH-1 was identified to control debris flow onsite. As designed and engineered and described in the Original

Draft EIR, the Proposed Project does not include the potential for mudflow to encroach outside of the landfill property.

### Response to Comment No. 23-28

The air quality analysis of the Final EIR has been updated to reflect the Assembly Bill 32 Scoping Plan, along with other comments on the Original Draft EIR.

### Response to Comment No. 23-29

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, which updates and replaces the referenced discussion. The revised Air Quality chapter includes dust control best management practices for construction and operation. An updated Water Supply Assessment for the Proposed Project, which documents the availability of water for the Proposed Project, is included in Appendix J of the Final EIR.

### Response to Comment No. 23-30

Please see the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, as well as Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health. The cumulative impact analysis in revised Chapter 11, Air Quality, includes reasonably foreseeable projects identified in Chapter 3.0, General Setting and Resource Area Analysis. Existing locations of sensitive receptors and locations of planned schools, residences, and businesses are included in the air quality and health risk analyses for the Proposed Project and Cumulative Impacts analyses for the Proposed Project, even if not specifically identified in the text of the Air Quality chapter. Please see Chapter 11, Air Quality, Section 11.9 of the Partially Recirculated Draft EIR.

Proposed increases in elevation were included in the model inputs. Meteorological data inputs for the Health Risks Assessment are provided in Appendix H, which incorporates observed meteorological data trends. Please also see Topical Responses #1d and #1e, Air Quality, for additional information.

### Response to Comment No. 23-31

Please see the expanded odor analysis in the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR. Please also see Topical Response #17, Odor.

### Response to Comment No. 23-32

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, as well as Topical Response #3, Composting Facility and Conversion Technology.

### Response to Comment No. 23-33

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which replaces the Original Draft EIR chapter.

### Response to Comment No. 23-34

Please see the Visual Supplement of the Partially Recirculated Draft EIR for a discussion of potential visual impacts to the proposed Newhall Land and Farming residential developments.

Please see Topical Response #7 for a discussion of Cumulative Impacts, including potential impacts to Visual Resources associated with the proposed Newhall Land and Farming residential developments.

Please also see Topical Response #27 for a discussion of Visual Resources.



**DEPARTMENT OF TRANSPORTATION**  
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*Serious drought.  
 Help save water!*

August 25, 2014

Ms. Iris Chi  
 County of Los Angeles  
 Department of Regional Planning  
 320 West Temple Street  
 Los Angeles, CA 90012

**Re: Chiquita Canyon Landfill Master Plan Revision**  
 Draft Environmental Impact Report (DEIR)  
 SCH#2005081071, IGR#140715/EA  
 Vic: LA /126/0.00 – 5.00

Dear Ms. Chi:

The California Department of Transportation (Caltrans) has reviewed the Traffic Impact Analysis (TIA) included in the DEIR prepared for the proposed Chiquita Canyon Landfill (CCL) Master Plan Revision. Proposed Master Plan revisions include extension of existing waste footprint from 257 to approximately 400 acres, continue operation of the landfill, increase disposal limits, acceptance of all nonhazardous wastes permitted at a class III solid waste landfill, development of a Household Hazardous Waste Facility, and a mixed organics composting operation. The project site is located approximately three miles west of I-5 and north of State Route 126 (SR-126).

Based on a review of the Traffic and Transportation section, Caltrans has the following comments:

- According to the transportation chapter (Table 10-8), the proposed project would generate a net increase of approximately 2,332 average daily vehicle trips during weekdays with 594 occurring in the AM peak hour and 1166 in the PM peak hour. A passenger car equivalent factor of 2.0 was used to convert truck trips to passenger car equivalents. Only the intersection of Commerce Center Drive and SR-126 is anticipated to be temporarily impacted significantly utilizing Los Angeles County CMP guidelines. This intersection is currently under construction as part of the Commerce Center Drive/SR-126 improvement project, which is scheduled to be complete in 2016. Please include a description of improvements under way at this intersection.

24-1

- Caltrans is concerned with potential adverse impacts to the northbound I-5 off-ramp to SR-126. Caltrans staff observed long queues of trucks, during the AM peak period, occurring in the third left-turn lane. Any additional trucks queuing in the left-turn lane may potentially

24-2

<p>block the right turn lane, thus creating a safety hazard. As a temporary measure, Caltrans plans to lengthen all left and right turn pockets an additional 200 feet. A more comprehensive (or long term) solution should be investigated for this off-ramp to accommodate future development on the Westside areas (west of I-5) and the additional trucks traffic to the Chiquita Canyon Landfill. Caltrans recommends the CCL Master Plan revision is conditioned to contribute funding towards the planned temporary improvement at I-5 northbound off-ramp to SR-126. Caltrans does not concur with the queuing analysis done for this off-ramp as it concludes that sufficient storage is available.</p>	24-2 cont'd
<ul style="list-style-type: none"><li>• Most of the traffic (85%) is expected to come to or from I-5 however, there is no analysis of potential impacts to I-5. Please include analysis of potential impacts to I-5 mainline and inform about planned improvements such as the truck climbing lanes on the Newhall pass.</li></ul>	24-3
<ul style="list-style-type: none"><li>• The Master Plan revision proposes to relocate the entrance to the landfill to the Walcott Way and Franklin Parkway. This relocation will bring more heavy duty trucks to Walcott Way and SR-126 intersection. To address any potential conflicts between slow truck trying to make the right turn and fast moving through traffic, extension of the right turn lane is recommended. The westbound SR-126 left turn into Walcott Way should be studied in more detail to determine if the left turn pocket should also be extended.</li></ul>	24-4
<ul style="list-style-type: none"><li>• The Traffic Impact Analysis (TIA) only projects to 2015 even though the CCL is seeking a permit to continue operations for 20 to 30 years. Previous studies for the Newhall Ranch Specific Plan development have identified improvements to SR-126 including widening it to 4 lanes in each direction through the segments next to the CCL site. The CCL Master Plan revision should recognize future improvements to SR-126 and contribute to their implementation commensurate with its contribution of future traffic. For a more appropriate cumulative transportation analysis, it is recommended that the TIA is revised to include all foreseeable development within Newhall Ranch Specific Plan and in the Commerce Center area. All queuing analysis should be revised accordingly.</li></ul>	24-5
<ul style="list-style-type: none"><li>• The report makes the assumption that scales will process one truck per minute; there should be a contingency plan in place in the event that the scale malfunctions. Please make necessary plans to avoid truck queuing on Walcott Way back to SR-126. Perhaps additional storage parking should be provided on Franklin Parkway. Please modify Figure 7-2 to clearly show the two storage lanes and the 900 feet distance prior before the scales.</li></ul>	24-6
<ul style="list-style-type: none"><li>• Any modifications on or affecting State right-of-way will need an encroachment permit from Caltrans. Please require that any modifications to right-of-way on or adjacent to SR-126 are coordinated with Caltrans early. Please be aware that redirection of storm water run-off onto State right-of-way is generally not permitted.</li></ul>	24-7

Ms. Iris Chi  
August 25, 2014  
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If you have any questions about these comments, you may contact Elmer Alvarez, project coordinator at (213) 897-6696 or me at (213)897-9140.

Sincerely,

A handwritten signature in black ink, appearing to read "Dianna Watson". The signature is fluid and cursive, with a large initial "D" and "W".

DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

# Letter No. 24

Dianna Watson  
Department of Transportation  
District 7-Office of Transportation Planning  
100 S. Main Street, MS 16  
Los Angeles, CA 90012

## Response to Comment No. 24-1

A description of the completed improvements at the intersection of Commerce Center Drive/State Route 126 (SR-126) has been added to the Final EIR. Construction of the Commerce Center Drive/SR-126 improvement project was completed in Fall 2016, and included reconstructing the at-grade intersection into a grade-separated diamond interchange. Vehicles on SR-126 are able to travel uninterrupted through the Commerce Center Drive crossing, and vehicles on Commerce Center Drive access SR-126 via signalized diamond interchange ramps on Commerce Center Drive.

## Response to Comment No. 24-2

### *I-5 Off-Ramp Queueing Analysis*

Caltrans has reported that existing traffic patterns show that a majority of the truck traffic exiting northbound Interstate 5 (I-5) and continuing onto westbound SR-126 uses the right-most left-turn lane. Existing vehicle classification counts were collected for the northbound approach and are provided in Appendix G-3.

Figure 24-1 illustrates the summary of the vehicle classification data for the northbound approach on the I-5 northbound off-ramp at SR-126. As shown in Figure 24-1, the data support the claims that Caltrans reported. In the a.m. peak hour, 89.4 percent of the trucks exiting the I-5 northbound off-ramp use the outside left-turn lane (left-turn lane 3). In the p.m. peak hour, 67.5 percent of the trucks exiting the I-5 northbound off-ramp use the outside left-turn lane.

Queue lengths at the northbound and southbound I-5 off-ramps were examined to evaluate whether or not adequate storage is available to accommodate peak-hour traffic with the Proposed Project. Table 24-1 reports the available I-5 northbound and southbound off-ramp storage at SR-126 and the anticipated queue lengths for the following scenarios:

- Existing Conditions
- Existing plus Growth (2015) Conditions without Project
- Existing plus Growth (2015) plus Other Development Conditions without Project
- Existing plus Growth (2015) Conditions with Project
- Existing plus Growth (2015) plus Other Development Conditions with Project

The amount of truck traffic in each lane (as summarized in Figure 24-1), was inserted into the Synchro models for all scenarios to ensure that the queueing analysis accounted for the lopsided stacking of trucks in the right-most left-turn lane. The queue lengths reported in Table 24-1 represent the 95th percentile queue length as calculated in Synchro. The worse peak-hour queue length is reported. Review of the anticipated 95th percentile queue lengths shows that the peak-hour queue lengths do not exceed the available off-ramp storage in any of the five scenarios analyzed. In addition, the Proposed Project will only cause a slight increase (less than 10 feet) in the queue length in the Existing plus Growth plus Other Development plus Project conditions (based on Synchro analysis). Closer review of the queuing analysis also shows that the northbound off-ramp queues reported in Table 24-1 are driven by the right-turn lane and not the left-turn lanes. In all scenarios, the right-turn lane queue on the northbound off-ramp was projected to be the longest queue length. Therefore, the increase in truck traffic due to the project has no effect on the longest queue on the

northbound off-ramp, because the longest queue does not change in volume with the Proposed Project (the northbound right-turn movement).

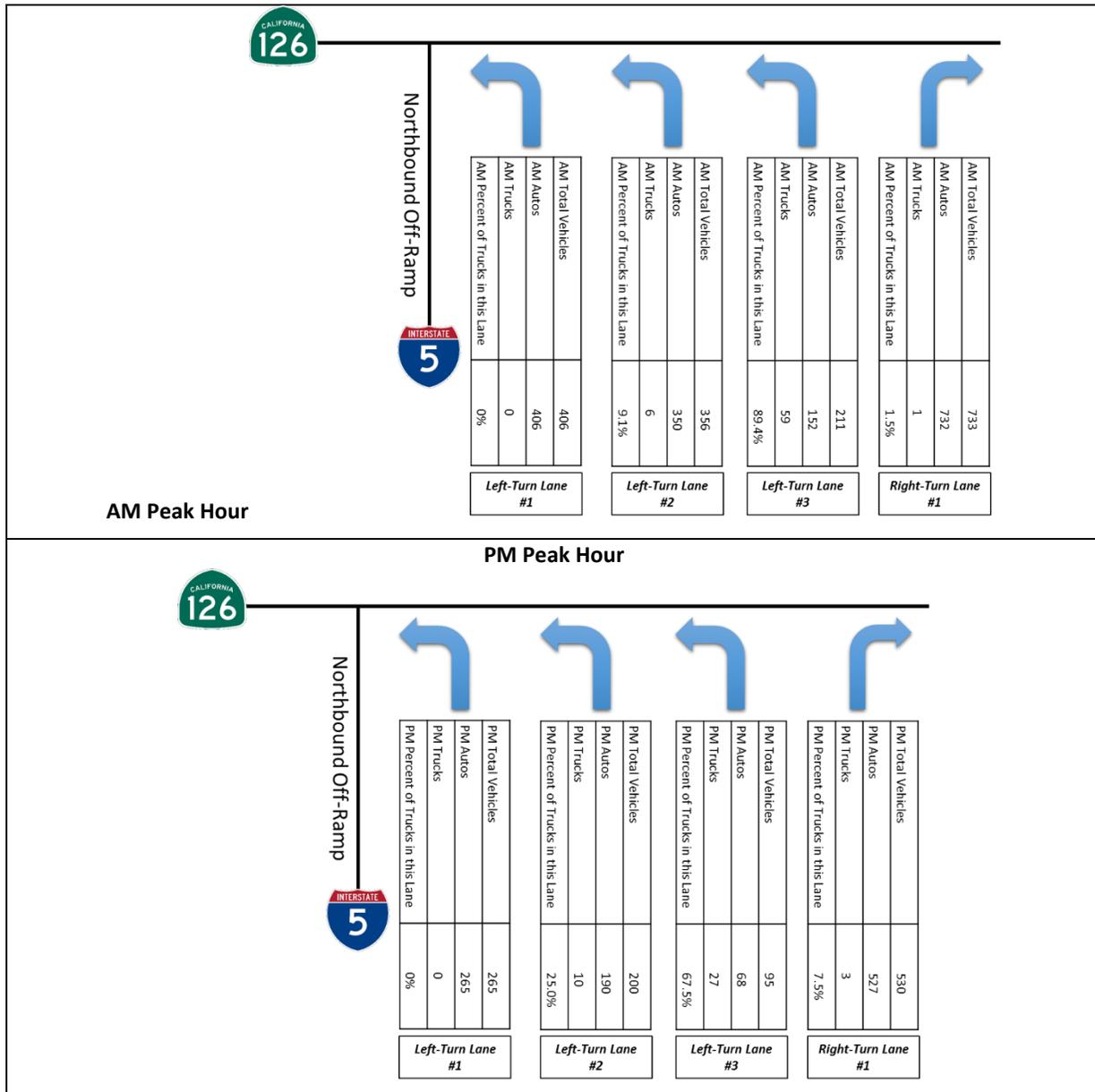


Figure 24-1. I-5 Northbound Off-Ramp at SR-126, Vehicle Classification Summary

Table 24-1. Interstate 5 Off-Ramp Queue Analysis at State Route 126

Chiquita Canyon Landfill Final EIR

	I-5 Southbound off-ramp and SR-126	I-5 Northbound off-ramp and SR-126
Available Off-Ramp Storage Length (ft)	1,600	1,300
Existing Conditions Queue Length (ft)	237	548
Existing plus Growth Queue Length (ft)	281	524
Existing plus Growth plus Other Development Queue Length (ft)	303	534
Existing plus Growth plus Project Queue Length (ft)	281	525
Existing plus Growth plus Other Development plus Project Queue Length (ft)	311	534

## Response to Comment No. 24-3

### *I-5 Mainline Analysis*

The majority of the Proposed Project traffic (85 percent) will travel to CCL via I-5. Figures 10-7 and 10-8 in Chapter 10 of the Final EIR, illustrate the distribution of trips. South of SR-126, 64 trips will travel along northbound and southbound I-5 to/from SR-126 to access/leave CCL in the a.m. peak hour. In the p.m. peak hour south of SR-126, 65 trips will travel along northbound and southbound I-5 to/from SR-126 to access/leave the site. North of SR-126, there will only be two trips traveling along northbound and southbound I-5 to/from SR-126 to access/leave the site in the a.m. and p.m. peak hours.

Freeway analysis of I-5 was conducted to understand the effects of project traffic on I-5. The freeway analysis compares volume-to-capacity (V/C) ratios for the following scenarios:

- Existing Conditions
- Existing plus Growth (2015) Conditions without Project
- Existing plus Growth (2015) plus Other Development Conditions without Project
- Existing plus Growth (2015) Conditions with Project
- Existing plus Growth (2015) plus Other Development Conditions with Project

The freeway analysis was performed on I-5 freeway segments south of SR-126 as project trips north of SR-126 are nominal (two trips on northbound and southbound I-5 in both peak hours). The freeway analysis was based on the following assumptions/inputs:

- Existing freeway traffic data were based on the Caltrans Freeway Performance Measurement System and Caltrans Census Data.
- The lane geometry assumptions for each study segment are based on existing conditions.
- The capacity of general purpose lanes was assumed to be 2,000 vehicles/hour/lane.
- The capacity of auxiliary lanes was assumed to be 1,000 vehicles/hour/lane.
- It was assumed that all trips travelling to/from I-5, south of SR-126, would have origins or destinations south of Pico Canyon Road. South of Pico Canyon Road, project trips on I-5 would decrease as vehicles leave I-5 for destinations east or west of I-5. As the analysis will show, as project trips decrease south of Pico Canyon Road, their impact is considered nominal because they represent such a small percentage of the overall freeway traffic on I-5.
- All project trips are assumed to travel in the general purpose lanes on I-5 since truck traffic is not allowed in the high occupancy vehicle lanes.

The results of the I-5 Mainline analysis are summarized in Tables 24-2 through 24-6 as follows. Table 24-2 summarizes the Existing Condition freeway operations (V/C ratios). Under Existing Conditions, all northbound and southbound freeway segments on I-5 in the study area operate with a V/C ratio less than 0.80 in the a.m. and p.m. peak hours.

Table 24-3 summarizes the Existing plus Growth without Project Condition freeway operations (V/C ratios). Under Existing plus Growth without Project Conditions, all northbound and southbound freeway segments on I-5 in the study area will operate with a V/C ratio of 0.80 or less in the a.m. and p.m. peak hours.

Table 24-4 summarizes the Existing plus Growth plus Other Development without Project Condition freeway operations (V/C ratios). Under Existing plus Growth plus Other Development without Project Conditions, all northbound and southbound freeway segments on I-5 in the study area will operate with a V/C ratio of 0.82 or less in the a.m. and p.m. peak hours.

Table 24-5 summarizes the Existing plus Growth with Project Condition freeway operations (V/C ratios). Table 24-5 also compares Existing plus Growth with and without Project Conditions on I-5. Under Existing plus Growth with Project Conditions, all northbound and southbound freeway segments on I-5 in the study area will

operate with a V/C ratio of 0.81 or less in the a.m. and p.m. peak hours. In addition, the Proposed Project will not increase the V/C ratio of any study segment by more than 1 percent.

Table 24-6 summarizes the Existing plus Growth plus Other Development with Project Condition freeway operations (V/C ratios). Table 24-6 also compares Existing plus Growth plus Other Development with and without Project Conditions on I-5. Under Existing plus Growth plus Other Development with Project Conditions, all northbound and southbound freeway segments on I-5 in the study area will operate with a V/C ratio of 0.83 or less in the a.m. and p.m. peak hours. In addition, the Proposed Project will not increase the V/C ratio of any study segment by more than 1 percent.

Table 24-2. I-5 Freeway Operational Summary – Existing Conditions

Freeway Segment	HOV Lanes*	GP Lanes	Aux Lanes	Capacity**	AM Peak Hour		PM Peak Hour		
					Volume (veh/hour)**	V/C Ratio**	Volume (veh/hour)**	V/C Ratio**	
<b>Northbound I-5</b>									
Magic Mountain Pkwy on-ramp to SR-126 off-ramp	0	4	1	9,000	3,291	0.37	3,903	0.43	
Magic Mountain Pkwy off-ramp to Magic Mountain Pkwy on-ramp	0	4	0	8,000	3,046	0.38	3,561	0.45	
Valencia Blvd on-ramp to Magic Mountain Pkwy off-ramp	0	4	1	9,000	3,838	0.43	4,670	0.52	
Valencia Blvd off-ramp to Valencia Blvd on-ramp	0	4	0	8,000	2,730	0.34	3,388	0.42	
McBean Pkwy diagonal on-ramp to Valencia Blvd off-ramp	0	4	1	9,000	3,363	0.37	4,274	0.47	
McBean Pkwy loop on-ramp to McBean Pkwy diagonal on-ramp	0	4	0	8,000	3,279	0.41	4,157	0.52	
McBean Pkwy off-ramp to McBean Pkwy loop on-ramp	0	4	0	8,000	3,137	0.39	3,958	0.49	
Pico Canyon Rd/Lyons on-ramp to McBean Pkwy off-ramp	0	4	0	8,000	3,634	0.45	4,653	0.58	
Pico Canyon Rd/Lyons off-ramp to Pico Canyon Rd/Lyons on-ramp	0	4	0	8,000	3,109	0.39	3,919	0.49	
Calgrove Blvd on-ramp to Pico Canyon Rd/Lyons off-ramp	1	4	1	9,000	3,929	0.44	5,067	0.56	
<b>Southbound I-5</b>									
SR-126 on-ramp to The Old Rd off-ramp	0	4	0	8,000	2,382	0.30	3,147	0.39	
The Old Rd off-ramp to The Old Rd on-ramp	0	4	0	8,000	2,280	0.29	3,045	0.38	
The Old Rd on-ramp to Magic Mountain Pkwy off-ramp	0	4	0	8,000	2,941	0.37	3,706	0.46	
Magic Mountain Pkwy off-ramp to Magic Mountain Pkwy on-ramp	0	4	0	8,000	2,683	0.34	3,448	0.43	
Magic Mountain Pkwy on-ramp to Valencia Blvd off-ramp	0	4	0	8,000	3,140	0.39	3,905	0.49	
Valencia Blvd off-ramp to Valencia Blvd loop on-ramp	0	4	0	8,000	2,949	0.37	3,714	0.46	
Valencia Blvd loop on-ramp to Valencia Blvd diagonal on-ramp	0	4	0	8,000	3,816	0.48	5,141	0.64	
Valencia Blvd diagonal on-ramp to McBean Pkwy off-ramp	0	4	0	8,000	4,218	0.53	5,428	0.68	
McBean Pkwy off-ramp to McBean Pkwy loop on-ramp	0	4	0	8,000	3,984	0.50	5,194	0.65	
McBean Pkwy loop on-ramp to McBean Pkwy diagonal on-ramp	0	4	0	8,000	4,449	0.56	5,478	0.68	
McBean Pkwy diagonal on-ramp to Pico Canyon Rd/Lyons Ave off-ramp	0	4	0	8,000	4,660	0.58	5,689	0.71	
Pico Canyon Rd/Lyons Ave off-ramp to Pico Canyon Rd/Lyons Ave loop on-ramp	0	4	0	8,000	4,388	0.55	5,417	0.68	
Pico Canyon Rd/Lyons Ave loop on-ramp to Pico Canyon Rd/Lyons Ave diagonal on-ramp	0	4	0	8,000	4,641	0.58	5,670	0.71	
Pico Canyon Rd/Lyons Ave diagonal on-ramp to Calgrove Blvd off-ramp	1	4	0	8,000	5,055	0.63	6,084	0.76	

\* HOV lane geometry reported for reference only. Project/truck traffic is not permitted in HOV lanes and is therefore not a focus of the freeway analysis to assess project impacts.

\*\* Reported for general purpose plus auxiliary lanes only (truck traffic is not permitted in HOV lanes). Capacity assumptions: 2,000 veh/hour/lane for GP lanes and 1,000 veh/hour/lane for auxiliary lanes.

Table 24-3. I-5 Freeway Operational Summary – Existing plus Growth without Project Conditions

Freeway Segment	HOV Lanes*	GP Lanes	Aux Lanes	Capacity**	AM Peak Hour		PM Peak Hour		
					Volume (veh/hour)**	V/C Ratio**	Volume (veh/hour)**	V/C Ratio**	
<b>Northbound I-5</b>									
Magic Mountain Pkwy on-ramp to SR-126 off-ramp	0	4	1	9,000	3,481	0.39	4,130	0.46	
Magic Mountain Pkwy off-ramp to Magic Mountain Pkwy on-ramp	0	4	0	8,000	3,223	0.40	3,768	0.47	
Valencia Blvd on-ramp to Magic Mountain Pkwy off-ramp	0	4	1	9,000	4,061	0.45	4,941	0.55	
Valencia Blvd off-ramp to Valencia Blvd on-ramp	0	4	0	8,000	2,888	0.36	3,584	0.45	
McBean Pkwy diagonal on-ramp to Valencia Blvd off-ramp	0	4	1	9,000	3,558	0.40	4,522	0.50	
McBean Pkwy loop on-ramp to McBean Pkwy diagonal on-ramp	0	4	0	8,000	3,469	0.43	4,398	0.55	
McBean Pkwy off-ramp to McBean Pkwy loop on-ramp	0	4	0	8,000	3,319	0.41	4,187	0.52	
Pico Canyon Rd/Lyons on-ramp to McBean Pkwy off-ramp	0	4	0	8,000	3,844	0.48	4,923	0.62	
Pico Canyon Rd/Lyons off-ramp to Pico Canyon Rd/Lyons on-ramp	0	4	0	8,000	3,289	0.41	4,146	0.52	
Calgrove Blvd on-ramp to Pico Canyon Rd/Lyons off-ramp	1	4	1	9,000	4,157	0.46	5,361	0.60	
<b>Southbound I-5</b>									
SR-126 on-ramp to The Old Rd off-ramp	0	4	0	8,000	2,520	0.32	3,330	0.42	
The Old Rd off-ramp to The Old Rd on-ramp	0	4	0	8,000	2,412	0.30	3,222	0.40	
The Old Rd on-ramp to Magic Mountain Pkwy off-ramp	0	4	0	8,000	3,111	0.39	3,921	0.49	
Magic Mountain Pkwy off-ramp to Magic Mountain Pkwy on-ramp	0	4	0	8,000	2,839	0.35	3,648	0.46	
Magic Mountain Pkwy on-ramp to Valencia Blvd off-ramp	0	4	0	8,000	3,322	0.42	4,131	0.52	
Valencia Blvd off-ramp to Valencia Blvd loop on-ramp	0	4	0	8,000	3,120	0.39	3,930	0.49	
Valencia Blvd loop on-ramp to Valencia Blvd diagonal on-ramp	0	4	0	8,000	4,037	0.50	5,439	0.68	
Valencia Blvd diagonal on-ramp to McBean Pkwy off-ramp	0	4	0	8,000	4,463	0.56	5,743	0.72	
McBean Pkwy off-ramp to McBean Pkwy loop on-ramp	0	4	0	8,000	4,215	0.53	5,495	0.69	
McBean Pkwy loop on-ramp to McBean Pkwy diagonal on-ramp	0	4	0	8,000	4,707	0.59	5,796	0.72	
McBean Pkwy diagonal on-ramp to Pico Canyon Rd/Lyons Ave off-ramp	0	4	0	8,000	4,930	0.62	6,019	0.75	
Pico Canyon Rd/Lyons Ave off-ramp to Pico Canyon Rd/Lyons Ave loop on-ramp	0	4	0	8,000	4,643	0.58	5,731	0.72	
Pico Canyon Rd/Lyons Ave loop on-ramp to Pico Canyon Rd/Lyons Ave diagonal on-ramp	0	4	0	8,000	4,911	0.61	5,999	0.75	
Pico Canyon Rd/Lyons Ave diagonal on-ramp to Calgrove Blvd off-ramp	1	4	0	8,000	5,348	0.67	6,437	0.80	

\* HOV lane geometry reported for reference only. Project/truck traffic is not permitted in HOV lanes and is therefore not a focus of the freeway analysis to assess project impacts.

\*\* Reported for general purpose plus auxiliary lanes only (truck traffic is not permitted in HOV lanes). Capacity assumptions: 2,000 veh/hour/lane for GP lanes and 1,000 veh/hour/lane for auxiliary lanes.

Table 24-4. I-5 Freeway Operational Summary – Existing plus Growth plus Other Development without Project Conditions

Freeway Segment	HOV Lanes*	GP Lanes	Aux Lanes	Capacity**	AM Peak Hour		PM Peak Hour		
					Volume (veh/hour)**	V/C Ratio**	Volume (veh/hour)**	V/C Ratio**	
<b>Northbound I-5</b>									
Magic Mountain Pkwy on-ramp to SR-126 off-ramp	0	4	1	9,000	3,613	0.40	4,292	0.48	
Magic Mountain Pkwy off-ramp to Magic Mountain Pkwy on-ramp	0	4	0	8,000	3,355	0.42	3,930	0.49	
Valencia Blvd on-ramp to Magic Mountain Pkwy off-ramp	0	4	1	9,000	4,193	0.47	5,103	0.57	
Valencia Blvd off-ramp to Valencia Blvd on-ramp	0	4	0	8,000	3,020	0.38	3,746	0.47	
McBean Pkwy diagonal on-ramp to Valencia Blvd off-ramp	0	4	1	9,000	3,690	0.41	4,684	0.52	
McBean Pkwy loop on-ramp to McBean Pkwy diagonal on-ramp	0	4	0	8,000	3,601	0.45	4,560	0.57	
McBean Pkwy off-ramp to McBean Pkwy loop on-ramp	0	4	0	8,000	3,451	0.43	4,349	0.54	
Pico Canyon Rd/Lyons on-ramp to McBean Pkwy off-ramp	0	4	0	8,000	3,976	0.50	5,085	0.64	
Pico Canyon Rd/Lyons off-ramp to Pico Canyon Rd/Lyons on-ramp	0	4	0	8,000	3,421	0.43	4,308	0.54	
Calgrove Blvd on-ramp to Pico Canyon Rd/Lyons off-ramp	1	4	1	9,000	4,289	0.48	5,523	0.61	
<b>Southbound I-5</b>									
SR-126 on-ramp to The Old Rd off-ramp	0	4	0	8,000	2,542	0.32	3,444	0.43	
The Old Rd off-ramp to The Old Rd on-ramp	0	4	0	8,000	2,434	0.30	3,336	0.42	
The Old Rd on-ramp to Magic Mountain Pkwy off-ramp	0	4	0	8,000	3,133	0.39	4,035	0.50	
Magic Mountain Pkwy off-ramp to Magic Mountain Pkwy on-ramp	0	4	0	8,000	2,861	0.36	3,762	0.47	
Magic Mountain Pkwy on-ramp to Valencia Blvd off-ramp	0	4	0	8,000	3,344	0.42	4,245	0.53	
Valencia Blvd off-ramp to Valencia Blvd loop on-ramp	0	4	0	8,000	3,142	0.39	4,044	0.51	
Valencia Blvd loop on-ramp to Valencia Blvd diagonal on-ramp	0	4	0	8,000	4,059	0.51	5,553	0.69	
Valencia Blvd diagonal on-ramp to McBean Pkwy off-ramp	0	4	0	8,000	4,485	0.56	5,857	0.73	
McBean Pkwy off-ramp to McBean Pkwy loop on-ramp	0	4	0	8,000	4,237	0.53	5,609	0.70	
McBean Pkwy loop on-ramp to McBean Pkwy diagonal on-ramp	0	4	0	8,000	4,729	0.59	5,910	0.74	
McBean Pkwy diagonal on-ramp to Pico Canyon Rd/Lyons Ave off-ramp	0	4	0	8,000	4,952	0.62	6,133	0.77	
Pico Canyon Rd/Lyons Ave off-ramp to Pico Canyon Rd/Lyons Ave loop on-ramp	0	4	0	8,000	4,665	0.58	5,845	0.73	
Pico Canyon Rd/Lyons Ave loop on-ramp to Pico Canyon Rd/Lyons Ave diagonal on-ramp	0	4	0	8,000	4,933	0.62	6,113	0.76	
Pico Canyon Rd/Lyons Ave diagonal on-ramp to Calgrove Blvd off-ramp	1	4	0	8,000	5,370	0.67	6,551	0.82	

\* HOV lane geometry reported for reference only. Project/truck traffic is not permitted in HOV lanes and is therefore not a focus of the freeway analysis to assess project impacts.

\*\* Reported for general purpose plus auxiliary lanes only (truck traffic is not permitted in HOV lanes). Capacity assumptions: 2,000 veh/hour/lane for GP lanes and 1,000 veh/hour/lane for auxiliary lanes.

Table 24-5. I-5 Freeway Operational Summary – Existing plus Growth with Project Conditions

Freeway Segment	Existing plus Growth Conditions										Existing plus Growth plus Project Conditions					
	HOV Lanes*	GP Lanes	Aux Lanes	Capacity**	AM Peak Hour		PM Peak Hour		AM Peak Hour			PM Peak Hour				
					Volume (veh/hour)**	V/C Ratio**	Volume (veh/hour)**	V/C Ratio**	Volume (veh/hour)**	V/C Ratio**	V/C Ratio Increase	Volume (veh/hour)**	V/C Ratio**	V/C Ratio Increase		
<b>Northbound I-5</b>																
Magic Mountain Pkwy on-ramp	to	SR-126 off-ramp	0	4	1	9,000	3,481	0.39	4,130	0.46	3,545	0.39	0.00	4,195	0.47	0.01
Magic Mountain Pkwy off-ramp	to	Magic Mountain Pkwy on-ramp	0	4	0	8,000	3,223	0.40	3,768	0.47	3,287	0.41	0.01	3,833	0.48	0.01
Valencia Blvd on-ramp	to	Magic Mountain Pkwy off-ramp	0	4	1	9,000	4,061	0.45	4,941	0.55	4,125	0.46	0.01	5,006	0.56	0.01
Valencia Blvd off-ramp	to	Valencia Blvd on-ramp	0	4	0	8,000	2,888	0.36	3,584	0.45	2,952	0.37	0.01	3,649	0.46	0.01
McBean Pkwy diagonal on-ramp	to	Valencia Blvd off-ramp	0	4	1	9,000	3,558	0.40	4,522	0.50	3,622	0.40	0.00	4,587	0.51	0.01
McBean Pkwy loop on-ramp	to	McBean Pkwy diagonal on-ramp	0	4	0	8,000	3,469	0.43	4,398	0.55	3,533	0.44	0.01	4,463	0.56	0.01
McBean Pkwy off-ramp	to	McBean Pkwy loop on-ramp	0	4	0	8,000	3,319	0.41	4,187	0.52	3,383	0.42	0.01	4,252	0.53	0.01
Pico Canyon Rd/Lyons on-ramp	to	McBean Pkwy off-ramp	0	4	0	8,000	3,844	0.48	4,923	0.62	3,908	0.49	0.01	4,988	0.62	0.00
Pico Canyon Rd/Lyons off-ramp	to	Pico Canyon Rd/Lyons on-ramp	0	4	0	8,000	3,289	0.41	4,146	0.52	3,353	0.42	0.01	4,211	0.53	0.01
Calgrove Blvd on-ramp	to	Pico Canyon Rd/Lyons off-ramp	1	4	1	9,000	4,157	0.46	5,361	0.60	4,221	0.47	0.01	5,426	0.60	0.00
<b>Southbound I-5</b>																
SR-126 on-ramp	to	The Old Rd off-ramp	0	4	0	8,000	2,520	0.32	3,330	0.42	2,584	0.32	0.00	3,395	0.42	0.00
The Old Rd off-ramp	to	The Old Rd on-ramp	0	4	0	8,000	2,412	0.30	3,222	0.40	2,476	0.31	0.01	3,287	0.41	0.01
The Old Rd on-ramp	to	Magic Mountain Pkwy off-ramp	0	4	0	8,000	3,111	0.39	3,921	0.49	3,175	0.40	0.01	3,986	0.50	0.01
Magic Mountain Pkwy off-ramp	to	Magic Mountain Pkwy on-ramp	0	4	0	8,000	2,839	0.35	3,648	0.46	2,903	0.36	0.01	3,713	0.46	0.00
Magic Mountain Pkwy on-ramp	to	Valencia Blvd off-ramp	0	4	0	8,000	3,322	0.42	4,131	0.52	3,386	0.42	0.00	4,196	0.52	0.00
Valencia Blvd off-ramp	to	Valencia Blvd loop on-ramp	0	4	0	8,000	3,120	0.39	3,930	0.49	3,184	0.40	0.01	3,995	0.50	0.01
Valencia Blvd loop on-ramp	to	Valencia Blvd diagonal on-ramp	0	4	0	8,000	4,037	0.50	5,439	0.68	4,101	0.51	0.01	5,504	0.69	0.01
Valencia Blvd diagonal on-ramp	to	McBean Pkwy off-ramp	0	4	0	8,000	4,463	0.56	5,743	0.72	4,527	0.57	0.01	5,808	0.73	0.01
McBean Pkwy off-ramp	to	McBean Pkwy loop on-ramp	0	4	0	8,000	4,215	0.53	5,495	0.69	4,279	0.53	0.00	5,560	0.69	0.00
McBean Pkwy loop on-ramp	to	McBean Pkwy diagonal on-ramp	0	4	0	8,000	4,707	0.59	5,796	0.72	4,771	0.60	0.01	5,861	0.73	0.01
McBean Pkwy diagonal on-ramp	to	Pico Canyon Rd/Lyons Ave off-ramp	0	4	0	8,000	4,930	0.62	6,019	0.75	4,994	0.62	0.00	6,084	0.76	0.01
Pico Canyon Rd/Lyons Ave off-ramp	to	Pico Canyon Rd/Lyons Ave loop on-ramp	0	4	0	8,000	4,643	0.58	5,731	0.72	4,707	0.59	0.01	5,796	0.72	0.00
Pico Canyon Rd/Lyons Ave loop on-ramp	to	Pico Canyon Rd/Lyons Ave diagonal on-ramp	0	4	0	8,000	4,911	0.61	5,999	0.75	4,975	0.62	0.01	6,064	0.76	0.01
Pico Canyon Rd/Lyons Ave diagonal on-ramp	to	Calgrove Blvd off-ramp	1	4	0	8,000	5,348	0.67	6,437	0.80	5,412	0.68	0.01	6,502	0.81	0.01

\* HOV lane geometry reported for reference only. Project/truck traffic is not permitted in HOV lanes and is therefore not a focus of the freeway analysis to assess project impacts.

\*\* Reported for general purpose plus auxiliary lanes only (truck traffic is not permitted in HOV lanes). Capacity assumptions: 2,000 veh/hour/lane for GP lanes and 1,000 veh/hour/lane for auxiliary lanes.



Table 24-6. I-5 Freeway Operational Summary – Existing plus Growth plus Other Development with Project Conditions

Freeway Segment	Existing plus Growth plus Other Development Conditions										Existing plus Growth plus Other Development plus Project Conditions						
	AM Peak Hour					PM Peak Hour					AM Peak Hour			PM Peak Hour			
	HOV Lanes*	GP Lanes	Aux Lanes	Capacity**	Volume (veh/hour)**	V/C Ratio**	Volume (veh/hour)**	V/C Ratio**	Volume (veh/hour)**	V/C Ratio**	V/C Increase	Volume (veh/hour)**	V/C Ratio**	V/C Increase			
<b>Northbound I-5</b>																	
Magic Mountain Pkwy on-ramp	to	SR-126 off-ramp	0	4	1	9,000	3,613	0.40	4,292	0.48		3,677	0.41	0.01	4,357	0.48	0.00
Magic Mountain Pkwy off-ramp	to	Magic Mountain Pkwy on-ramp	0	4	0	8,000	3,355	0.42	3,930	0.49		3,419	0.43	0.01	3,995	0.50	0.01
Valencia Blvd on-ramp	to	Magic Mountain Pkwy off-ramp	0	4	1	9,000	4,193	0.47	5,103	0.57		4,257	0.47	0.00	5,168	0.57	0.00
Valencia Blvd off-ramp	to	Valencia Blvd on-ramp	0	4	0	8,000	3,020	0.38	3,746	0.47		3,084	0.39	0.01	3,811	0.48	0.01
McBean Pkwy diagonal on-ramp	to	Valencia Blvd off-ramp	0	4	1	9,000	3,690	0.41	4,684	0.52		3,754	0.42	0.01	4,749	0.53	0.01
McBean Pkwy loop on-ramp	to	McBean Pkwy diagonal on-ramp	0	4	0	8,000	3,601	0.45	4,560	0.57		3,665	0.46	0.01	4,625	0.58	0.01
McBean Pkwy off-ramp	to	McBean Pkwy loop on-ramp	0	4	0	8,000	3,451	0.43	4,349	0.54		3,515	0.44	0.01	4,414	0.55	0.01
Pico Canyon Rd/Lyons on-ramp	to	McBean Pkwy off-ramp	0	4	0	8,000	3,976	0.50	5,085	0.64		4,040	0.51	0.01	5,150	0.64	0.00
Pico Canyon Rd/Lyons off-ramp	to	Pico Canyon Rd/Lyons on-ramp	0	4	0	8,000	3,421	0.43	4,308	0.54		3,485	0.44	0.01	4,373	0.55	0.01
Calgrove Blvd on-ramp	to	Pico Canyon Rd/Lyons off-ramp	1	4	1	9,000	4,289	0.48	5,523	0.61		4,353	0.48	0.00	5,588	0.62	0.01
<b>Southbound I-5</b>																	
SR-126 on-ramp	to	The Old Rd off-ramp	0	4	0	8,000	2,542	0.32	3,444	0.43		2,606	0.33	0.01	3,509	0.44	0.01
The Old Rd off-ramp	to	The Old Rd on-ramp	0	4	0	8,000	2,434	0.30	3,336	0.42		2,498	0.31	0.01	3,401	0.43	0.01
The Old Rd on-ramp	to	Magic Mountain Pkwy off-ramp	0	4	0	8,000	3,133	0.39	4,035	0.50		3,197	0.40	0.01	4,100	0.51	0.01
Magic Mountain Pkwy off-ramp	to	Magic Mountain Pkwy on-ramp	0	4	0	8,000	2,861	0.36	3,762	0.47		2,925	0.37	0.01	3,827	0.48	0.01
Magic Mountain Pkwy on-ramp	to	Valencia Blvd off-ramp	0	4	0	8,000	3,344	0.42	4,245	0.53		3,408	0.43	0.01	4,310	0.54	0.01
Valencia Blvd off-ramp	to	Valencia Blvd loop on-ramp	0	4	0	8,000	3,142	0.39	4,044	0.51		3,206	0.40	0.01	4,109	0.51	0.00
Valencia Blvd loop on-ramp	to	Valencia Blvd diagonal on-ramp	0	4	0	8,000	4,059	0.51	5,553	0.69		4,123	0.52	0.01	5,618	0.70	0.01
Valencia Blvd diagonal on-ramp	to	McBean Pkwy off-ramp	0	4	0	8,000	4,485	0.56	5,857	0.73		4,549	0.57	0.01	5,922	0.74	0.01
McBean Pkwy off-ramp	to	McBean Pkwy loop on-ramp	0	4	0	8,000	4,237	0.53	5,609	0.70		4,301	0.54	0.01	5,674	0.71	0.01
McBean Pkwy loop on-ramp	to	McBean Pkwy diagonal on-ramp	0	4	0	8,000	4,729	0.59	5,910	0.74		4,793	0.60	0.01	5,975	0.75	0.01
McBean Pkwy diagonal on-ramp	to	Pico Canyon Rd/Lyons Ave off-ramp	0	4	0	8,000	4,952	0.62	6,133	0.77		5,016	0.63	0.01	6,198	0.77	0.00
Pico Canyon Rd/Lyons Ave off-ramp	to	Pico Canyon Rd/Lyons Ave loop on-ramp	0	4	0	8,000	4,665	0.58	5,845	0.73		4,729	0.59	0.01	5,910	0.74	0.01
Pico Canyon Rd/Lyons Ave loop on-ramp	to	Pico Canyon Rd/Lyons Ave diagonal on-ramp	0	4	0	8,000	4,933	0.62	6,113	0.76		4,997	0.62	0.00	6,178	0.77	0.01
Pico Canyon Rd/Lyons Ave diagonal on-ramp	to	Calgrove Blvd off-ramp	1	4	0	8,000	5,370	0.67	6,551	0.82		5,434	0.68	0.01	6,616	0.83	0.01

\* HOV lane geometry reported for reference only. Project/truck traffic is not permitted in HOV lanes and is therefore not a focus of the freeway analysis to assess project impacts.

\*\* Reported for general purpose plus auxiliary lanes only (truck traffic is not permitted in HOV lanes). Capacity assumptions: 2,000 veh/hour/lane for GP lanes and 1,000 veh/hour/lane for auxiliary lanes.

### *Newhall Pass*

The Proposed Project would have no impact on Newhall Pass because the project trips represent such a small percentage of the overall freeway traffic. I-5 currently carries 193,000 average daily trips near the SR-14 junction. The project-added trips represent an approximately 0.5 percent increase in the daily traffic load. Furthermore, the I-5 improvement project on Newhall Pass was completed in December 2014, which provides added capacity and safety to this segment of I-5. The project, which began construction in May 2012, added a fifth mixed-flow lane to northbound I-5 between SR-14 and the Gavin Canyon undercrossing, a distance of 1.4 miles. The 3.7 miles of southbound I-5 improvements include a fifth mixed-flow lane between Pico Canyon Road/Lyons Avenue and a half-mile south of Gavin Canyon, and a new segment of truck lane that begins north of Weldon Canyon and merges with the existing truck lane north of the SR-14 connector. New median and outside retaining walls were also built to accommodate the highway widening. The new truck lane segment separates slower moving trucks from passenger vehicles on the steep grade, reducing congestion and enhancing safety in all lanes.

## Response to Comment No. 24-4

### *Intersection Queues at SR-126/Wolcott Way*

Queue lengths at the intersection of SR-126 and Wolcott Way were examined to evaluate whether or not adequate storage is available to accommodate peak-hour traffic with the addition of the Proposed Project trips. Table 24-7 reports the available storage for the movements in which the project will add traffic (westbound right-turn and eastbound left-turn movements) at the intersection of SR-126 and Wolcott Way and the anticipated queue lengths in the following scenarios:

- Existing Conditions
- Existing plus Growth (2015) Conditions without Project
- Existing plus Growth (2015) plus Other Development Conditions without Project
- Existing plus Growth (2015) Conditions with Project
- Existing plus Growth (2015) plus Other Development Conditions with Project

The Synchro intersection analysis shows that the projected queue lengths for the westbound right-turn lane and eastbound left-turn lane at SR-126 and Wolcott Way can be accommodated within the provided storage. The provided storage in both the westbound right-turn lane and eastbound left-turn lane pockets at SR-126 and Wolcott Way is 450 feet. The longest projected queue length in the westbound right-turn lane is 21 feet. The longest projected queue length in the eastbound left-turn lane is 52 feet. Both of these projected queue lengths are far less than the 450 feet of provided storage. This allows trucks travelling to CCL from SR-126 adequate space to decelerate inside the turn pockets and not on SR-126.

Table 24-7. Queue Analysis At Sr-126/Wolcott Way

	Westbound Right-Turn	Eastbound Left-Turn
Available Off-Ramp Storage Length (ft)	450	450
Existing Conditions Queue Length (ft)	0	34
Existing plus Growth Queue Length (ft)	0	34
Existing plus Growth plus Other Development Queue Length (ft)	0	38
Existing plus Growth plus Project Queue Length (ft)	21	52
Existing plus Growth plus Other Development plus Project Queue Length (ft)	21	52

## Response to Comment No. 24-5

### *Long-Term Future Analysis of SR-126*

The traffic analysis is based on a Proposed Project buildout year of 2015 (i.e., CCL can operate at full capacity in 2015). However, CCL will continue to operate for 20 to 30 years beyond 2015. In the vicinity of the project, the Newhall Land and Farm (NLF) developments will be built in the next 20 to 30 years.



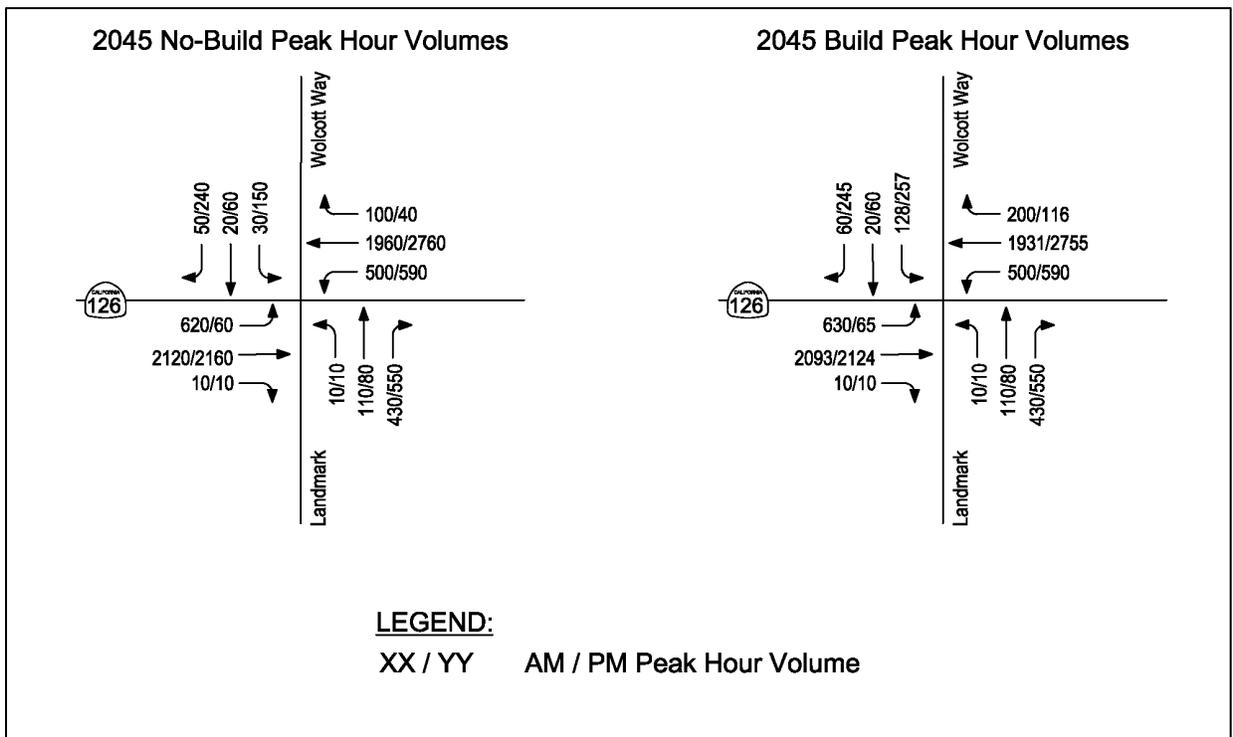


Figure 24-3. 2045 No-Build and Build Condition Peak-Hour Volumes at the SR-126/Wolcott Way Intersection

Table 24-8. Summary of Intersection Analysis – 2045 No-Build and Build Conditions at SR-126/Wolcott Way

Intersection	Control	2045 without Project Conditions								2045 with Project Conditions									
		AM Peak				PM Peak				AM Peak				PM Peak					
		Delay (sec/veh)	LOS	ICU	LOS	Delay (sec/veh)	LOS	ICU	LOS	Delay (sec/veh)	LOS	ICU	LOS	Delay (sec/v eh)	LOS	ICU	LOS	Significant Impact?	
3 Wolcott Way @ SR-126	Signalized	35.5	D	0.701	B	36.9	D	0.744	C	36.1	D	0.734	C	No	41.3	D	0.776	C	No

While the Proposed Project does not result in a significant traffic impact based on Los Angeles County and Caltrans’ traffic impact thresholds, CCL will consult with Caltrans regarding payment of any necessary fees.

### Response to Comment No. 24-6

The following text has been added to Chapter 10, and Figure 7-2 has been revised to clearly show the two storage lanes and the 900 feet distance prior before the scales.

*In case of scale malfunction, failure, or emergency, project-related traffic will not be required to queue into Wolcott Way back to SR-126. CCL has backup power for the scales, the ability to put inbound trucks on outbound scales, and the ability to move trucks through the scales and into the landfill without weighing them and the ability to store trucks on the landfill if needed (trash-related [disposal] trucks will need to be stored on the landfill until scales are operational). These methods will ensure Project-related traffic will not be required to queue into Wolcott Way back to SR-126.*

### Response to Comment No. 24-7

The Caltrans right-of-way was accounted for in CCL’s site entrance design and the proposed entrance improvements will be constructed outside the right-of-way. Caltrans has indicated that any future modifications to SR-126 would likely be conducted within their existing right-of-way.

STATE CAPITOL  
P.O. BOX 942849  
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(916) 319-2038  
FAX (916) 319-2138

DISTRICT OFFICE  
27441 TOURNEY ROAD, SUITE 160  
VALENCIA, CA 91355  
(661) 286-1565  
FAX (661) 286-1408

EMAIL  
Assemblymember.Wilk@assembly.ca.gov

# Assembly California Legislature



SCOTT WILK  
ASSEMBLYMAN, THIRTY-EIGHTH DISTRICT

COMMITTEES  
VICE CHAIR, RULES  
ARTS, ENTERTAINMENT, SPORTS,  
TOURISM AND INTERNET MEDIA  
BUSINESS, PROFESSIONS AND  
CONSUMER PROTECTION  
HIGHER EDUCATION  
GOVERNMENTAL ORGANIZATION

August 26, 2014

Ms. Iris Chi  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Chi:

I am writing to express my support of Chiquita Canyon Landfill and its Master Plan Revisions detailed in the recently-released Draft Environmental Impact Report (DEIR).

Solid waste management and disposal is a key component to the success of any region, and Chiquita Canyon has provided this valuable service to the people of this Los Angeles County area for more than 40 years. The proposed Master Plan Revisions will play a significant role in ensuring that the company is able to effectively handle our solid waste for decades to come. LA County Public Works released findings stating that there could be a potential shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In reviewing the DEIR, it is evident that Chiquita Canyon took several factors into consideration when determining the best and most viable methods of expansion. While the proposed changes include an increased disposal rate and volume, footprint extension, and increased elevation - the expanded landfill will not negatively impact the visual integrity of the area. In addition, Chiquita has practiced due diligence in addressing potential environmental, noise, traffic, and cultural impacts of the expansion and ongoing operation.

Chiquita Canyon has been recognized for its Clean Energy Facility, which converts methane into clean energy that powers approximately 7,000 homes per year. The addition of a proposed Household Hazardous Waste Facility, Mixed Organics Composting Facility, and potential Conversion Technology Facility, will further address waste needs while protecting the surrounding environment.

I applaud the ongoing efforts of Chiquita Canyon Landfill to manage and process the solid waste needs of the region in a responsible manner. I believe the proposed changes to the Master Plan will help the company effectively address the community's changing and growing needs.

Sincerely,

Scott Wilk  
Assemblyman, 38<sup>th</sup> Assembly District

Cc: Supervisor Michael D. Antonovich

25-1

SEP 08 2014  
BY: \_\_\_\_\_

## Letter No. 25

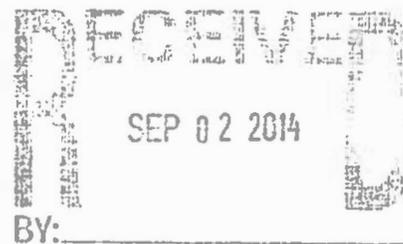
Scott Wilk  
Assembly California Legislature  
District Office  
27441 Tourney Rd., Suite 160  
Valencia, CA 91355

### Response to Comment No. 25-1

Comment acknowledged.

August 26, 2014

Ms. Iris Chi  
County of Los Angeles Dept. of Regional Planning  
Zoning Permits North Section, Room 1348  
320 West Temple Street  
Los Angeles, CA 90012



Dear Ms. Chi:

**RE: SUPPORT/ COMMENTS ON CHIQUITA CANYON LANDFILL  
DRAFT ENVIRONMENTAL IMPACT REPORT**

If I may introduce myself, I am Ron Saldana, Executive Director of the Los Angeles County Disposal Association (LACDA), representing solid waste collectors, recyclers, facility owners and operators, and associated companies that provide goods and services to the industry, throughout Southern California.

LACDA strongly supports the proposed expansion to the Chiquita Canyon Landfill, increasing the permitted daily disposal tonnage from 6,000 to 12,000 tons-per-day; increasing the disposal footprint laterally by 143 acres; and increasing the maximum elevation by 143 feet. This would, according to the DEIR, extend the existing Landfill's life by an additional 21 to 38 years. Of significant additional importance to our industry is the proposed addition of an on-site household hazardous waste facility and an open mixed organics composting operation, and the possibility of a conversion technology facility.

To answer a pressing question: **Yes there is a need for the expansion of the existing Chiquita Canyon Landfill.**

While State, Municipal, and Industry efforts continue our march to a Zero Waste goal, some set the calendar as early as 2025, and we continue to remove material from the waste/disposal bin and add it to the recycling bin, we must not lose sight that our diversion goals will only be achieved over time, and landfilling does continue to represent a vital component of our waste programs now and in the future. With the closure of the Puente Hills Landfill in 2013, and the loss of that 12,500 t.p.d. capacity, the Los Angeles area took a significant hit whose ripple

26-1

effects continue to be felt.

Insuring future landfill disposal capacity accrues many benefits. It keeps competition alive by guaranteeing that the few larger waste companies who own landfills will not achieve a monopoly in the industry – preserving competition that translates to lower trash bills for area residents and businesses; it **does not** slow down any of our waste diversion and recycling goals which are guided by a variety of mandates and regulations at both State and Local levels, requiring landfill diversion and increasing reporting requirements to insure these mandates are met. And I would say that added recycling services have become a competitive tool which companies utilize to attract customers. While there are many other reasons for expanding Chiquita Canyon Landfill, it is imperative that we are prepared for natural disasters and have the immediate ability to remove and dispose of large quantities of material in a very short amount of time.

Thank you for your time on this matter, please do not hesitate to contact me if I can provide additional information or help in any way.

26-1  
cont'd

Sincerely,



Ron Saldana, Executive Director



Mark Blackburn, LACDA President  
Universal Waste Systems

## Letter No. 26

Ron Saldana  
Los Angeles County Disposal Association  
5753-G Santa Ana Canyon Road, Suite 508  
Anaheim Hills, CA 92807

### Response to Comment No. 26-1

Comment acknowledged.





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#27

August 26, 2014

Iris Chi  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Chi:

The Valley Industry Association of Santa Clarita, a business organization of approximately 250 companies, would like to express our support of the findings of the Draft Environmental Impact Report for Master Plan Revisions to Chiquita Canyon. As an organization, we believe these proposed revisions are important to the landfill's continued service to the region, handling the solid waste needs of area businesses and families.

The Valley Industry Association was founded to promote and protect business interests throughout the Santa Clarita Valley. We recognize and support the role Chiquita Canyon plays as a significant business in the area, and the services it provides to the region as a whole.

The proposed revisions will increase the overall capacity of the landfill and allow it to better address solid waste needs in the years to come. The DEIR outlines how those revisions are being handled in a responsible manner and how Chiquita Canyon has worked hard to ensure they have little to no impact on the surrounding environment and community. In addition, we feel the development of a future green waste processing/composting facility and household hazardous waste facility will offer additional resources, while providing additional jobs and economic benefits to the Valley.

27-1

Chiquita Canyon has been handling the solid waste needs of our local residents and businesses for more than 40 years, and we believe the revisions proposed in the DEIR are necessary and are being handled in a safe and responsible manner.

Sincerely,

Kathy Morris  
CEO/President  
Valley Industry Association  
of Santa Clarita

Cc: Supervisor Michael D. Antonovich



BY: \_\_\_\_\_

## Letter No. 27

Kathy Norris  
Valley Industry Association  
25030 Avenue Tibbitts, Suite K  
Valencia, CA 91355

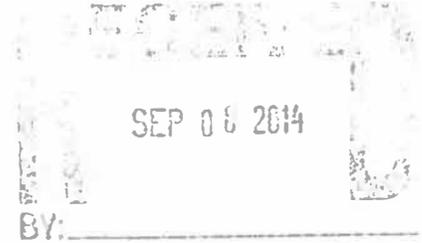
### Response to Comment No. 27-1

Comment acknowledged.



August 28, 2014

Ms. Iris Chi  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012



Dear Ms. Chi:

I'm writing on behalf of the SCV Chamber of Commerce in support of the information in the recently-released DEIR regarding revisions to the Chiquita Canyon Master Plan. The Chamber reflects the creativity and diversity of the greater Castaic region, and is focused on taking action and making decisions that affect the business community. To that end, we recognize the important role that Chiquita Canyon plays in the Santa Clarita Valley and the region as a whole.

The responsible management of solid waste is key to our growing region, and the expansion and increased disposal rate being proposed for Chiquita Canyon will address this issue for several decades. The DEIR document also highlights the fact that this expansion is designed to not cause significant impacts to the region from an environmental or visual standpoint, protecting the overall integrity of the area.

Beyond addressing current solid waste needs, we support that Chiquita Canyon is also planning for the development of a Household Hazardous Waste Facility and a Mixed Organics Composting Facility, both of which will have far-reaching benefits to the people that live throughout the region. This – on top of the current Clean Energy Facility operating on-site – demonstrate the landfill's commitment to the environment and to responsibly handling the region's waste.

The items highlighted in the DEIR documents address some of the key concerns associated with the expansion and operation of Chiquita Canyon, including the environment, storm water and water runoff, air quality, noise, dust, and traffic. While many areas will not be impacted by the revisions, the landfill will be monitoring the area and is prepared to mitigate any issues as needed. The DEIR address the traffic safety concern with the addition of a new traffic signal and safer intersection to enter and exit the facility. The Chamber feels this is in line with how the company has done business over the last 40 years, operating the landfill in a responsible manner and taking measures to ensure the protection of the surrounding environment.

We are pleased to recognize Chiquita Canyon as local business that contributes to the economy and plays an active role by supporting local groups, organizations, and events. We support the expansion of the landfill and revisions to the Master Plan – all of which will continue the region's ongoing partnership with the company and protect our solid waste needs now and in the future.

Best regards,

Terri Crain  
President/CEO

28-1

## Letter No. 28

Terri Crain  
Santa Clarita Valley Chamber of Commerce  
27451 Tourney Rd., Suite 160  
Santa Clarita, CA 91355

### Response to Comment No. 28-1

Comment acknowledged.

Iris Chi

---

**From:** C4CCLC [chiquitalandfill@gmail.com]  
**Sent:** Saturday, August 30, 2014 6:20 PM  
**To:** Iris Chi  
**Subject:** Draft Deir

Chiquita Canyon Landfill needs to be bonded. There are great violations when it comes to the health of residents near the landfill. Now that the community is meeting and discussing the same health effects across an entire community, it is more than apparent that a LLC company cannot afford the lawsuits that will be levied against them. If they are not bonded then the county will also have to be sued.

The draft Deir should be postponed till they are bonded.

The draft Deir should be postponed until the health issues are addressed.

The draft Deir should be postponed until the air monitors that have been missing in Val Verde for well over 8 years are up and running. Due to the fact that it is a violation of the contract.

The Chiquita Canyon Landfill does not keep the contract now and cannot be trusted to keep it in the future.

The Draft Deir should be postponed since Val Verde does not have a representative that sits on the VVCAC board. The Landfill has one, but Val Verde is not allowed to have one.

The draft Deir should be postponed since none of the representatives for the community were present to hear the complaints of the residents, and of their poor and declining health.

The draft Deir should be postponed, due to the fact that none of the residents who speak Spanish were given notification in Spanish. A direct violation of human ran civil rights.

29-1

# Letter No. 29

C4CCLC

## Response to Comment No. 29-1

Please see the following Topical Responses:

- #21, Public Health
- #5, Conditional Use Permit and Community Agreement
- #22, Public Scoping and Public Outreach

**Iris Chi**

---

**From:** Chris Burnside [christophburnside@gmail.com]  
**Sent:** Monday, September 01, 2014 4:28 AM  
**To:** Iris Chi  
**Subject:** Chiquito Canyon Landfill

Hello Iris,

Here is a copy of what I just posted on the Draft DEIR site.  
Asthma, I became convinced that the dump had something to do with it. Every time I left Val Verde for any extended length of time my symptoms would ease. I always thought it was fumes or gas being released that caused my asthma and lack of energy. This could be the case, however, I am now leaning toward a more insidious cause that is rarely talked about, often misdiagnosed as asthma and/or emphysema, and occurs in the area dust/dirt for sure. I am talking about Valley Fever. <https://www.vfce.arizona.edu/valleyfever...> has anybody considered that everyday the dump could be stirring up this toxic spore and disseminating it throughout the area? It is a very real possibility and I suggest that anyone suffering symptoms of asthma, chronic fatigue or other “mystery” illnesses to look into it. A Antelope Valley teen died from this a year ago and the SCV is noted as a hotspot in the linked news report:  
<http://losangeles.cbslocal.com/2012/09/18/only-on-cbs2-expert-sheds-light-on-valley-fever-after-it-kills-antelope-valley-teen/> This is a REAL problem that is potentially deadly. The spores travel on dust in the wind. I wish for the landfill ground to be tested for Valley Fever as well as citizens of Val Verde who have any of the symptoms. One more site for great info: <http://www.reportingonhealth.org/valleyfever/just-one-breath-misdiagnosis-valley-fever-prolongs-suffering> Thank You.

30-1

# Letter No. 30

Chris Burnside

## Response to Comment No. 30-1

Please see Topical Response #21, Public Health. Best management practices to control fugitive dust from the Proposed Project are included in Table 11-1 of revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR and have been included in the Mitigation Monitoring and Reporting Plan (MMRP) for the Proposed Project, included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcing compliance with the MMRP.

September 3, 2014

Ms. Iris Chi  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Chi:

I'm writing on behalf of the Castaic Area Chamber of Commerce in support of the information in the recently-released DEIR regarding revisions to the Chiquita Canyon Master Plan. The Chamber reflects the creativity and diversity of the greater Castaic region, and is focused on taking action and making decisions that affect the business community. To that end, we recognize the important role that Chiquita Canyon plays in the Santa Clarita Valley and the region as a whole.

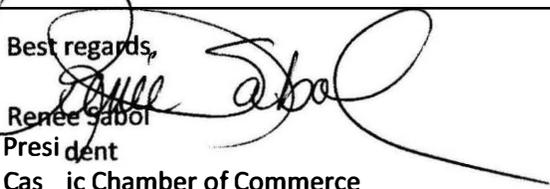
The responsible management of solid waste is key to our growing region, and the expansion and increased disposal rate being proposed for Chiquita Canyon will address this issue for several decades. The DEIR document also highlights the fact that this expansion is designed to not cause significant impacts to the region from an environmental or visual standpoint, protecting the overall integrity of the area.

Beyond addressing current solid waste needs, we support that Chiquita Canyon is also planning for the development of a Household Hazardous Waste Facility and a Mixed Organics Composting Facility, both of which will have far-reaching benefits to the people that live throughout the region. This – on top of the current Clean Energy Facility operating on-site – demonstrate the landfill's commitment to the environment and to responsibly handling the region's waste.

The items highlighted in the DEIR documents address some of the key concerns associated with the expansion and operation of Chiquita Canyon, including the environment, storm water and water runoff, air quality, noise, dust, and traffic. While many areas will not be impacted by the revisions, the landfill will be monitoring the area and is prepared to mitigate any issues as needed. The Chamber feels this is line with how the company has done business over the last 40 years, operating the landfill in a responsible manner and taking measures to ensure the protection of the surrounding environment.

We are pleased to recognize Chiquita Canyon as local business that contributes to the economy and plays an active role by supporting local groups, organizations, and events. We support the expansion of the landfill and revisions to the Master Plan – all of which will continue the region's ongoing partnership with the company and protect our solid waste needs now and in the future.

Best regards,

  
Renee Sabol

President  
Castaic Chamber of Commerce

Cc: Supervisor Michael D. Antonovich

31-1

# Letter No. 31

Renee Sabol  
Castaic Area Chamber of Commerce

## Response to Comment No. 31-1

Comment acknowledged.

Ronald Mechsner

E-Mail: rmechsner@rjmtechnology.com

 #32

September 5, 2014

Ms. Iris Chi  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

**RE: Chiquita Canyon DIER**

Dear Ms. Chi:

On August 6, 2014, the West Ranch Town Council, in a unanimous vote, voted to support the Chiquita Canyon DEIR Master Plan Revision, which includes the plan for the expansion of the Chiquita Canyon landfill serving the Santa Clarita Valley.

The Council believes that the DEIR addresses community concerns and that the expansion of Chiquita Canyon is in the best interest of the unincorporated Los Angeles communities (Sunset Pointe, Southern Oaks, Stevenson Ranch, and Westridge) represented by the West Ranch Town Council.

Please feel free to forward this letter of support to the Los Angeles County Regional Planning Board.

32-1

Sincerely,

Ronald Mechsner  
President, West Ranch Town Council

Cc: Rosalind Wayman

# Letter No. 32

Ronald Mechsner  
West Ranch Town Council

Response to Comment No. 32-1

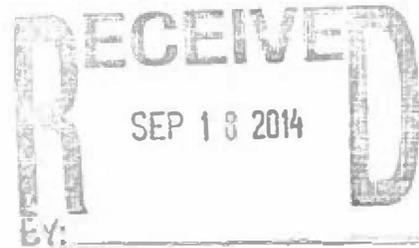
Comment acknowledged.



**SANTA CLARITA VALLEY**  
ECONOMIC DEVELOPMENT CORPORATION

September 9, 2014

Ms. Iris Chi  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012



Dear Ms. Chi:

The Santa Clarita Valley Economic Development Corporation is committed to attracting and retaining business and industry in the Santa Clarita Valley, including the creation of high-paying jobs for our workforce and the stimulation of our local economy. We support the information in the recently released DEIR on the Master Plan Revisions for Chiquita Canyon, recognizing the vital service the landfill provides to the region and the additional positive impacts it directly, and indirectly, affords.

Chiquita Canyon has been providing an important service to the homes and businesses in the Santa Clarita Valley and the Los Angeles region for more than four decades. The proposed revisions to the company's Master Plan will go far toward ensuring that the landfill can continue to responsibly meet the solid waste needs of the region for another 20-40 years.

The construction and operation needs of the expanded landfill will also result in additional local jobs, increased tax and fee revenues, and an increased Community Benefits Fund. While an on-site Clean Energy Facility already provides power to nearly 7,000 homes in the area, plans for green waste processing and composting operations, and a new household hazardous waste facility will address the evolving needs of the people who live and work in the area.

Beyond increasing capacity via the expansion of the current footprint and increased elevation, the proposed revisions include a new entrance, which will provide additional safety to vehicles entering and exiting Chiquita Canyon while screening views from SR-126 and Wolcott Way. The increased capacity will also allow the landfill to accept more tonnage without visually impacting the neighboring area.

Chiquita Canyon has built a reputation for handling the area's solid waste needs in an environmentally conscientious manner, monitoring environmental and related impacts to ensure the Valley's natural resources are protected. The DEIR clearly outlines the less-than-significant impacts of the landfill expansion and Master Plan revisions, and the company is accounting for all necessary mitigation to lessen impact on the area.

The SCVEDC believes Chiquita Canyon is a key resource for the region and plays an important role in its overall success. The proposed revisions to the Master Plan, outlined in the DEIR, will better equip the landfill to continue that role as the Santa Clarita Valley's needs increase and evolve.

Sincerely,

Holly Schroeder  
President/CEO  
Santa Clarita Valley Economic Development Corporation

Cc: Supervisor Michael D. Antonovich

33-1

# Letter No. 33

Holly Schroeder  
Santa Clarita Valley Economic Development Corporation  
26455 Rockwell Canyon Road, UCEN 263  
Santa Clarita, CA 91355

## Response to Comment No. 33-1

Comment acknowledged.

Attachment 6

September 10, 2014

Iris Chi  
Zoning Permits Section Room 1345  
Los Angeles County Department of Regional Planning  
320 W. Temple Street  
Los Angeles California 90012

Re: Chiquita Canyon Landfill Expansion Draft Environmental Impact Report  
Project No. R2004-00559-(5) SCH No. 2005081071

**Informed Decisions and the Request for Air Quality Monitors before evaluating the DEIR.**

Dear Ms. Chi:

34-1

As a resident of Val Verde, I am concerned about the draft environmental impact report, because **no intelligent decision can be made by anyone without information from the air quality monitors** we were promised 15 years ago. The DEIR has been based upon air quality monitors in Reseda and Burbank, as well as Newhall (still much too far away). Even if the latter monitor were placed nearby, according to the most recent information available, the Newhall monitor doesn't measure vinyl chloride, sulfur dioxide and particulate matter. Thus, the entire DEIR evaluation is hypothetical and based upon useless data.

If we had air quality monitors—for methane (CH<sub>4</sub>), ammonia (NH<sub>3</sub>), vinyl chloride (C<sub>2</sub>H<sub>3</sub>CL), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), hydrogen sulfide (H<sub>2</sub>S), carbon monoxide (CO), ozone (O<sub>3</sub>), particulate matter with aerodynamic diameters equal to or less than 10 microns (PM<sub>10</sub> & PM<sub>2.5</sub>), diesel fumes and visually obstructive matter —posted in the vicinity of Lincoln Avenue and central Val Verde, and if the county provided neutral, trained air quality monitor “readers” (professional evaluators) and record-keepers, we would not be speculating about whether or not the landfill is dangerous. We would know exactly what needs to be done for it to be safe or whether it is too dangerous for animals and human health in Val Verde to extend and expand the landfill. At this point the argument to find places to dump garbage in remote areas would become poignant, rather than obstructionist and it would no longer be necessary to speculate whether we are alarmists or heroes. Then, we would know what we were bargaining for. Air quality monitors in Val Verde would be the great clarifier.

Thank you for your time.

Sincerely yours,

*Faye Snyder, PsyD*  
30263 TRELIS ROAD  
VAL VERDE, CA 91384-2484

## Letter No. 34

Faye Snyder  
30263 Trellis Road  
Val Verde, CA 91384-2484

### Response to Comment No. 34-1

Please see Topical Response #10, Environmental Monitoring, for a discussion of air quality and landfill gas monitoring.



September 10, 2014

Iris Chi and Paul McCarthy  
 Los Angeles County Department of Regional Planning  
 320 West Temple Street  
 Los Angeles, CA 90012  
 Sent via mail and email to pmccarthy@planning.lacounty.gov

**Inadequate and Defective Public Notice and Denial of Opportunities for Meaningful Public Participation Opportunities for Spanish-Speaking Residents on the Chiquita Canyon Landfill Permit Process**

I am writing on behalf of our constituents living near the Chiquita Canyon Landfill. We are very concerned that the Los Angeles County Department of Regional Planning has failed to provide adequate notice to the many Spanish-speaking residents living near the landfill, and has completely denied these residents meaningful opportunities to participate in the environmental review process.

It is a clear fact that a large percentage of nearby residents are monolingual Spanish speakers, yet not one page of permit documents, including the Draft Environmental Impact Report, was translated into the language spoken by so many residents. In addition, we have been informed that no Spanish language notices were mailed to residents.

The county's failure to provide adequate notice and its failure to translate even one page of any permit or environmental review document has effectively and directly denied a large percentage of affected residents their legal right to meaningful participation in the permit process. As Spanish speaking residents did not receive effective notice and are unable to read the permit documents including the DEIR, they cannot participate in the process. This is particularly serious as the people of color and Spanish speakers who make up a significant percentage of local residents would also bear the disparate burden of a landfill expansion.

As a likely recipient of state and federal funding, your agency is subject to California Government Code 11135 and Title VI of the US Civil Rights Act. These civil rights laws prohibit recipients of state and federal funding from taking actions that have a discriminatory and disparate impact on people of color and Spanish-speakers. The failure to provide effective notice and meaningful public participation opportunities to the many Spanish speaking residents is therefore a violation of applicable civil rights laws.

Therefore, the permit process and current public comment period is invalid and must be stopped immediately until there is proper notice, adequate translation of key documents, and a real and meaningful opportunity for all residents to participate in the process. We thus call on the County to immediately cancel the current so-called public comment period. We look forward to your response and compliance with civil rights laws.

For health and environmental justice,

*Bradley Angel*

Bradley Angel, Executive Director

Cc Matt Rodriquez, Cal EPA Secretary  
 Arsenio Mataka, Cal EPA Assistant Secretary for Environmental Justice

Greenaction for Health and Environmental Justice  
 559 Ellis Street, San Francisco, CA 94109  
 Phone: (415) 447-3904 Fax: (415) 447-3905  
[www.greenaction.org](http://www.greenaction.org)

35-1

## Letter No. 35

Bradley Angel  
GreenAction for Health and Environmental Justice  
559 Ellis Street  
San Francisco, CA 94109

### Response to Comment No. 35-1

Please see Topical Response #22, Public Scoping and Public Outreach.



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027

P.O. Box 4025, SACRAMENTO, CALIFORNIA 95812

September 15, 2014

RECEIVED

SEP 15 2014

STATE CLEARINGHOUSE

Ms. Iris Chi, Planner
ichi@planning.lacounty.gov
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Subject: SCH No. 2005081071 – Draft Master Plan Revision/Environmental Impact Report for Chiquita Canyon Landfill, Facility No. 19-AA-0052 – Los Angeles County

Dear Ms. Chi:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments for this proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The County of Los Angeles, acting as Lead Agency, has prepared and circulated a Notice of Completion (NOC) of a Draft Environmental Impact Report (DEIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The Chiquita Canyon Landfill (Project) is located at 29201 Henry Mayo Drive, in the northwestern portion of unincorporated Los Angeles County, and is approximately three miles west of the intersection of Interstate 5 and State Route 126. The Project property boundary is 639 acres and is located within the Santa Clarita Valley Area Plan of the Los Angeles County General Plan and in the Castaic Area Community Standards District. The surrounding area consists of undeveloped open space, including primarily open lands to the north and rural residential development to the west and northwest along Chiquito Canyon Road and in the Val Verde area. Limited residential areas are located further to the northeast, and industrial/commercial uses are located further to the northeast, east, and southeast.

The proposed Project includes the following elements: development of new entrance and support facilities; a lateral extension of the existing waste disposal footprint from 257 acres to approximately 400 acres; an increased maximum elevation from 1,430 feet to 1,573 feet; increased daily disposal throughput from 6,000 tons per day (TPD) to 12,000 TPD; increased weekly disposal throughput from 30,000 tons to 60,000 tons; continued acceptance of all nonhazardous wastes permitted at a Class III solid waste disposal landfill; continued operation of the landfill; new design features; environmental monitoring; development of a Household Hazardous Waste Facility (HHWF); mixed organics composting operation; and set-aside of land for potential future conversion technology. In addition, the proposed Project includes the relocation of a portion of Southern California Edison's existing Saugus-Elizabeth Lake-Fillmore 66 kilovolt (kV) Subtransmission Line in order to accommodate landfill improvements.

Depending on actual disposal rates under the proposed project, the life of the landfill would be increased by 21 to 38 years. The actual site life and corresponding closure date is dependent on a number of factors including the disposal rate actually achieved over time.



An environmental assessment has concluded that the following environmental factors associated with the proposed project would be significant and unavoidable:

- Air Quality – PM<sub>10</sub> annual and PM<sub>10</sub> and PM<sub>2.5</sub> 24-hour cumulative concentrations would exceed their respective thresholds under the cumulative Project scenario during 2 modeled project years due to fugitive dust from travel on on-site paved roads.
- Traffic/Transportation – The intersection of Commerce Center Drive and SR-126 will temporarily exceed thresholds.

The DEIR concluded that the traffic impacts associated with the Commerce Center Drive and SR-126 intersection would be temporary since an improvement project is scheduled to be completed in 2016. Continuous watering of on-site paved roads to mitigate air quality impacts was considered; however, it was determined that the mitigation would not be feasible because of water availability concerns.

**COMMENTS**

**Proposed Daily Tonnage Throughput**

The DEIR states that the proposed daily disposal of 12,000 tons per day refers only to waste designated for disposal and does not include materials that are diverted from disposal or beneficially re-used. Is there a limit on the tonnage of diverted materials that can be received?

36-1

**Mixed Organics Composting Operation**

It appears that the DEIR does not analyze potential impacts associated with the mixed organics composting operation, which will also include pre/post-consumer food waste. If it was analyzed, please identify the section(s) that discuss the operational impacts associated with the mixed organics composting operation.

36-2

The hours for the composting operation are stated as 24 hours per day, 7 days a week. The landfill operations are 24 hours per day, except from 5:00 PM Saturday through 4:00 AM Monday. Does the exception apply to the composting operation as well?

36-3

**CONCLUSION**

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the DEIR and hopes that this comment letter will be useful to the Lead Agency preparing the Final EIR and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this project. Refer to 14 CCR Section 15094(c) that states:

If the project requires discretionary approval from any state agency, the local lead agency shall also, within five working days of this approval, file a copy of the Notice of Determination with the Office of Planning and Research [State Clearinghouse].

36-4

If the environmental document is adopted during a public hearing, CalRecycle staff requests ten days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff request ten days advance notification of the date of the adoption and project approval by the decision-making body.

If you have any questions regarding these comments, please contact Shannon Hill at 916.341.6174 or by e-mail at [Shannon.Hill@calrecycle.ca.gov](mailto:Shannon.Hill@calrecycle.ca.gov).

Sincerely,



Martin Perez  
Senior Environmental Scientist  
Training and Assistance Branch  
Waste Permitting, Compliance, and Mitigation Division  
CalRecycle

cc: Jeff Hackett, Manager  
Permitting and Assistance Branch – South Unit

Virginia Rosales, Supervisor  
Permitting and Assistance Branch – South Unit

Gerardo Villalobos, Chief  
Department of Public Health  
County of Los Angeles  
5050 Commerce Drive,  
Baldwin Park, CA 91706  
[gvillalobos@ph.lacounty.gov](mailto:gvillalobos@ph.lacounty.gov)

## Letter No. 36

Martin Perez  
CalRecycle  
Dept. of Resources, Recycling and Recovery  
1001 I Street  
Sacramento, CA 95814

### Response to Comment No. 36-1

Please see Topical Response #28, Waste Diverted. Please also see the response to CalRecycle Letter No. 288.

### Response to Comment No. 36-2

Please see Chapter 11, Air Quality, of the Partially Recirculated Draft EIR for an evaluation of the potential impacts associated with a mixed organics processing/composting facility. Please also see Topical Response #3, Composting Facility and Conversion Technology.

### Response to Comment No. 36-3

Please see Topical Response #3, Composting Facility and Conversion Technology, for clarification on hours for the mixed organics process/composting operation.

### Response to Comment No. 36-4

Comment acknowledged. The County will provide CalRecycle with any subsequent environmental documents, copies of public notices, and any Notices of Determination for the Proposed Project.



**VENTURA COUNTY WATERSHED PROTECTION DISTRICT**  
 PLANNING AND REGULATORY DIVISION  
 800 South Victoria Avenue, Ventura, California 93009  
 Sergio Vargas, Deputy Director – (805) 650-4077

**MEMORANDUM**

DATE: September 16, 2014

TO: Lori Gaines, RMA Planning  
 Laura Hocking, RMA Planning/ Planning Technician III

FROM: Sergio Vargas, P.E., Deputy Director *S.V.*

SUBJECT: RMA 11-036 – Chiquita Canyon Landfill Master Plan Revision: Draft EIR  
 Los Angeles County Department of Regional Planning

Pursuant to your request, this office has reviewed the subject Notice of Completion and Availability of a Draft EIR for Chiquita Canyon Landfill Master Plan Revision: Project No. R2004-00559-(5)

**PROJECT LOCATION**

The Chiquita Canyon Landfill is an existing Class III municipal solid waste facility located in the northwestern portion of unincorporated Los Angeles County near the City of Santa Clarita. The site is located westerly of the Interstate 5 and State Route 126 junction. The site is a total of 639 acres and has an existing permitted waste footprint of approximately 257 acres. Not all of the 257 acres has been developed to date.

**PROJECT DESCRIPTION**

The site is currently subject to County of Los Angeles Conditional Use Permit 89-051(5) which was approved in 1997. It is set to expire in 2019 although based on current CUP tonnage limits, the closure date is more realistically sometime between 2015 and 2019. Waste Connections, Inc. (Project Proponent) is now applying for a new CUP to implement the Chiquita Canyon Landfill Master Plan Revision.

The proposed project includes a new entrance and support facilities, a lateral extension of the existing waste footprint and increased maximum elevation, increased daily disposal limits, acceptance of nonhazardous wastes permitted at a Class III solid waste disposal landfill, environmental monitoring, development of a household hazardous waste facility, a mixed organics composting operation, land for potential future conversion technology, and the relocation of a portion of the Southern California Edison's existing Saugus-Elizabeth Lake-Fillmore 66 kilovolt subtransmission line in order to accommodate landfill improvements.

September 16, 2014

RMA 11-036 – Chiquita Canyon Landfill Master Plan Revision: Draft EIR

Page 2 of 2

**WATERSHED PROTECTION DISTRICT PROJECT COMMENTS:**

The site is located close to the Santa Clara River and approximately 4 miles upstream of the County line between Los Angeles and Ventura Counties. The Santa Clara River is a Ventura County Watershed Protection District (District) jurisdictional red line channel. The District is particularly interested in the evaluation of all potential effects on Ventura County.

According to the Draft EIR as prepared by CH2MHill for the Lead Agency; the Los Angeles County Department of Regional Planning, specifically on Pages 6-10 and 6-11 of the Surface Water Drainage Section (Section 6.7.2 Proposed Project), the proposed drainage and control system will be designed and constructed to carry the peak discharge resulting from the 1% annual chance (100-year) 24-hour storm event and the stormwater runoff volume resulting from the 50-year, 24-hour storm. The system will prevent substantial erosion of surface runoff and will not cause flooding. All surface water drainage from the landfill site will flow through one or more sedimentation ponds before discharging from the site. Drainage patterns will not be altered downstream of the two discharge points from the site, hence, offsite drainage will not be altered. The DEIR concludes that because the drainage and control system will be constructed, operated, and maintained in accordance with regulatory criteria (NPDES, Title 27, LACDPW), the potential for flooding will not be significant. The District believes therefore, that the proposed project will not result in a significant downstream flooding impact within Ventura County.

37-1

Thank you for the opportunity to comment and feel free to contact me for any further information or if you have further questions.

**END OF TEXT**

## Letter No. 37

Sergio Vargas  
Ventura County Watershed Protection District  
Planning and Regulatory Division  
800 South Victoria Avenue  
Ventura, CA 93009

### Response to Comment No. 37-1

Comment acknowledged.





**SCV Latino  
Chamber of Commerce**

September 17, 2014

Ms. Iris Chi  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Chi:

The Santa Clarita Valley Latino Chamber of Commerce is committed to promoting the success and prosperity of Latino business owners and professionals and to contribute to the well being of our community into the future.

To that end, our organization recognizes the important role that the Chiquita Canyon Landfill plays in the Santa Clarita Valley and the Los Angeles region as a whole. The purpose of this letter is to express our support of Chiquita Canyon's DEIR on its Master Plan Revisions. We believe these revisions will help the landfill evolve and grow with the region in order to better serve the needs of the businesses and families that call our Santa Clarita Valley home.

The Master Plan Revisions outlined in the DEIR are key to Chiquita maintaining existing services and capacity, while establishing additional critical solid waste management services in the future. In addition, these revisions will allow the landfill to continue to provide a much-needed resource to the region for more than 20 years. While the overall waste footprint and life of the landfill is being increased due to proposed increased disposal rates and volume, extension, and increased elevation, the changes will have no real visual impact to the surrounding community.

In looking at the DEIR, it is clear that Chiquita Canyon is carefully considering the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something we feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

The SCV Latino Chamber is proud to recognize businesses that are a positive impact and influence to the region. Chiquita Canyon has been a significant member and supporter of the community – and has taken the extra step to be involved with local organizations and events. This demonstrates their ongoing commitment to helping the Santa Clarita Valley have a bright, vibrant, and healthy future.

We are pleased to stand behind Chiquita Canyon and its revisions to the Master Plan. The company has shown due diligence in addressing all current and future issues, and they have measures in place to address any concerns that may occur during construction and operation.

Thank you.

Sincerely,

Bill Miranda, CEO

Cc: Supervisor Michael D. Antonovich

# Letter No. 38

Bill Miranda  
Santa Clarita Valley Latino Chamber of Commerce  
25322 Rye Canyon Rd., Ste. 204  
Valencia, CA 91355

## Response to Comment No. 38-1

Comment acknowledged.



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



#39

September 23, 2014

Ms. Iris Chi  
Los Angeles County Department of Regional Planning  
Zoning Permits North Section, Room 1348  
320 West Temple Street  
Los Angeles, CA 90012  
ichi@planning.lacounty.gov

**Subject: Comments on the Draft Environmental Impact Report for Chiquita Canyon  
Landfill Master Plan Revision, Los Angeles County (SCH #2005081071)**

Dear Ms. Chi:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) for the Chiquita Canyon Landfill (CCL) Master Plan Revision (Project). Los Angeles County Department of Regional Planning (County) is the lead agency for the DEIR under the California Environmental Quality Act (CEQA).

The DEIR describes that CCL is an existing Class III (municipal solid waste) facility located near the City of Santa Clarita, just west of the Interstate 5 (I-5) and State Route 126 (SR-126) interchange. The site is a total of 639 acres, with an existing permitted waste footprint of approximately 257 acres. Not all of the 257 acres has been developed.

The Project includes the following elements: development of a new entrance and support facilities; better utilization of the landfill's potential disposal capacity through a lateral extension of the existing waste footprint and increased maximum elevation; increased daily disposal limits; acceptance of all nonhazardous wastes permitted at a Class III solid waste disposal landfill; continued operation of the landfill; new design features; environmental monitoring; development of a Household Hazardous Waste Facility (HHWF); mixed organics composting operation; and set-aside of land for potential future conversion technology. In addition, the Project includes the relocation of a portion of Southern California Edison's (SCE) existing Saugus-Elizabeth Lake-Fillmore 66 kilovolt (kV) Subtransmission Line in order to accommodate landfill improvements.

The DEIR describes 3 Project alternatives including: Alternative A, the No Project Alternative; Alternative B, the Waste Reduction and Alternative Technologies Alternative, which describes and evaluates waste reduction techniques and alternative technologies that could potentially be applied to the solid waste management system in the County, including source reduction, mechanical volume reduction, resource recovery, and conversion technologies; and Alternative C, the Alternative New Site in Northern Los Angeles County Alternative.

The Santa Clara River is located about 1 mile south of CCL. The watercourses in this area are usually dry, maintaining surface flow only during the rainy months. The confluence of Castaic Creek, a Major tributary of the Santa Clara River, is located approximately 0.3 miles to the southeast of CCL. Within CCL, the major drainages carry surface water towards the Santa Clara River (from the western portion of the landfill) or Castaic Creek (from the eastern portion of the landfill) across lands owned by Newhall Land and Farming (NLF). In the immediate vicinity of

*Conserving California's Wildlife Since 1870*

CCL, some surface drainage flows to catch basins, where it is channelized into underground culverts. These culverts discharge water into surface drainages that discharge to the NLF lands closest to the Santa Clara River.

The DEIR describes that the Project would result in approximately 276 acres of permanent vegetation impacts throughout the life of the landfill. Impacts include: dry wash (2.2 acres), dry wash mule fat (*Baccharis salicifolia*) dominant (7.1 acres), Mixed Riversidean sage scrub/non-native grassland (34.9 acres), non-native grassland (47.6 acres), non-native grassland with scattered shrubs (42.8 acres), ruderal (10.7 acres), Riversidean sage scrub (117.5 acres), and southern mixed chaparral (13.6 acres). The DEIR also describes that Department jurisdictional waters of the state could potentially be permanently impacted from grading and filling activities. Potential losses would include riparian vegetation associated with seasonal washes, including mule fat scrub, Mexican elderberry (*Sambucus Mexicana*), and potentially scattered Fremont cottonwood (*Populus fremontii*). Additional impacts may potentially occur in waterways from construction or operational changes to water quality.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project, CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*

1. Project Alternatives – The Executive Summary (ES) of the DEIR describes 3 Project alternatives including: the No Project Alternative; the Waste Reduction and Alternative Technologies alternative and the Alternative New Site in Northern Los Angeles County Alternative. The DEIR concluded that no alternative, other than the No Project alternative, can reduce environmental impacts below those described within the Preferred Project and that the No Project alternative is infeasible. The ES further states: “the State CEQA Guidelines Section 15126.6(e)(2) states, “If the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Given this guidance, the environmentally superior alternative is Alternative B, Waste Reduction and Alternative Technologies Alternative.” On Page ES-9 the DEIR states: “The alternative waste reduction technologies, including conversion technologies, are not in and of themselves considered feasible alternatives to the Proposed Project.”

a) The DEIR appears to conclude that none of the selected feasible Project alternatives would reduce environmental impacts from the Project below that which is proposed in the preferred Project. If this is accurate, the Department recommends the EIR more clearly explained this conclusion.

39-1

b) The Department recommends that the lead agency adopt the Department's recommendations as conditions of Project approval to avoid, minimize, and mitigate for Project impacts to biological resources as further described below.

39-2

2. Biological Surveys – Appendix E-1 of the DEIR shows wildlife surveys conducted on the Project site in 2002 and lists 30 bird species, seven mammal species, six reptile species and no amphibian species observed during the approximately 17 site visits for various wildlife

39-3

surveys conducted in 2002. For the Department to consider survey results valid, surveys must be less than one year old for wildlife as representative of current Project conditions for impact analysis purposes under CEQA.

- a) Based on information included in the DEIR, the 2002 survey efforts used to detect wildlife and plants on site appear to have been done at a reconnaissance level based on the low numbers of species observed. The EIR should clarify if the 2002 surveys were focused and what the methods used to maximize detection.
- b) The Department recommends conducting current focused wildlife surveys employing efforts that would increase the likelihood of detecting species. Survey methods should include, but not be limited to: use of pit fall traps for reptile and amphibians; live trapping for small mammals; camera and tracking stations for mammals to show species diversity and wildlife movement uses; use of biologists familiar with bird vocalizations; and use of electronic detection devices and mist netting for bats.

39-3  
cont'd

c) Botanical Surveys – Table 1-1 of Appendix E-1 in the DEIR includes the Biota Report (Report) by CH2M Hill that lists special status plant species survey efforts conducted in 2002 and vegetation "monitoring, mapping and assessment" sampling efforts conducted between 2002 and 2012.

d) The Department considers botanical surveys current for two years for the purpose of establishing a baseline under CEQA. The only referenced special status botanical surveys in Table 1-1 appeared to have been conducted 12 years ago in 2002. The most recent reference to any botanical assessment effort is a "vegetation monitoring" sampling effort conducted in 2012. The DEIR should clarify if special status plants were surveyed for in this 2012 effort and what methods were used. If focused surveys were not conducted for special status plants in the 2012 vegetation monitoring effort, the Department recommends that a thorough, recent (less than 2 years old) floristic-based assessment of special status plants and natural communities be performed in the Project area, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <http://www.dfg.ca.gov/habcon/plant/>).

39-4

e) A current (less than 2 years old) focused floristic level survey effort has the potential to capture special status plant species that could be missed and presumed absent from a project site utilizing reconnaissance level survey approaches that adhere to general parameters intended to predict presence or absence. These general parameters include but are not limited to, reliance upon literature searches of reported species listed for specific study area, species range and soil type assumptions and ignoring presence of locally rare (and/or) regionally rare species; a species that is rare or uncommon in a local or regional context, and as such, it would meet the CEQA definition of a rare species (CEQA Sec 15380). CEQA directs that a special emphasis be placed on "environmental resources" that are rare or unique to the region and would be affected by a proposed project (CEQA §15125 (c)) or is so designated in local or regional plans, policies, or ordinances (CEQA Guidelines, Appendix G).

f) For botanical assessment and associated Project planning purposes in the EIR, the Department recommends using the vegetation classifications found in The Second

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Edition of *A Manual of California Vegetation*, which provides a standardized, systematic classification and description of vegetation in the State. Many CEQA documents received by the Department describe native desert vegetation as 'desert scrub', 'chaparral' or other generic terms that tend to downplay any significant vegetation resources on the project site. This should make it easier to determine if the Project is impacting rare habitat because the different dominant communities onsite will be described at a level to allow meaningful assessment. This classification system has been the State standard since 2009. Further guidance on nomenclature standards and assessing project impact significance can be found on the following Department's website: [http://www.dfg.ca.gov/biogeodata/vegcamp/natural\\_comm\\_background.asp](http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_background.asp).

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3. **Sensitive Plant Species.** Impact 8.6.3.4, page 8-47 and page 8-48 explains that there is a limited potential for occurrence of some federal- and State-listed plant species in the vicinity of CCL and that they may be lost as a result of the Project. The DEIR further describes that database analyses indicated limited distribution of CNPS List Category 1A and 1B plant species in the vicinity of CCL. However if rare plants are identified during preconstruction rare plant surveys, the area would be avoided as feasible. Mitigation BR-14 of the DEIR describes on page 8-48 that mitigation could include salvaging of topsoil to store the seedbank for later spreading of the soil at a suitable location offsite or onsite; Relocation of the plant(s) to a suitable location offsite; purchase of mitigation credits or offsite property with known populations of the affected species for inclusion in permanent open space areas or a conservation easement."

39-6

a) Mitigation BR-113 is referenced on page 8-48 of the DEIR as a special status plant species avoidance contingency measure but does not appear to be described any further in the document.

4. **Translocation of Plant Species.** The Department, in general, does not recommend translocation of rare plants, in particular bulbiferous species as a mitigation/minimization measure to reduce adverse effects from the project. Successful implementation of translocation is rare with minimal documented success. Even if translocation is initially successful, translocated species typically fail to persist over time. To ensure the conservation of sensitive plant species, translocation should be undertaken as a last resort.

39-7

Studies show success of translocation projects within the 10 to 15 percent range, with an optimistic outcome of 50 percent survival maintained over 5 years (Fiedler 1991; Howald 1996; Godefroid et al. 2011). For example, Los Angeles County approved the Deerlake Ranch Project (SCH# 2000061049) in January 14, 2003. The EIR included a Translocation Plan for Plummer's mariposa lily as mitigation for the species. The total population estimate of 2,000 individuals included in the MND was based on observation of above ground individuals (typically corm and bulbiferous plant populations are determined with consideration for significantly higher numbers of below ground corms and bulbs). For Deerlake Ranch, the original population estimate was counted during a spring survey; however, upon construction and salvage, over 22,000 bulbs were salvaged. Because transplantation projects have a poor success rate, and demonstrate a downward trend of survival over time (Godefroid, S., et al., 2010) the Department offers the following measures to the County to consider incorporating into a Translocation Plan to achieve a higher success rate in the implementation of the mitigation.

- a) The Department is willing to work with the County applicant to review and provide comments on any Transplantation Plan.
- b) The monitoring period for transplantation projects should be a minimum of 10 years, and during this period, the population should not demonstrate a downward trend, but remain stable or increasing.
- c) Recruitment should be considered in the success criteria as it indicates a population is self-sustaining by producing successive generations (Primack, 1996).
- d) The Transplantation Plan should include a mechanism to update the population baseline and success criteria based on corm/bulb counts documented during the salvage process because the number of flowering individuals per year is variable based on weather and is typically just a fraction of the true population. This discrepancy of actual corms/bulbs to flowering individuals should be accounted for in any mitigation requirement.
- e) The Transplantation Plan should include a detailed analysis of the methodology for transplanting and monitoring the species. The Plan should include; 1) a current estimate of the population to be impacted, 2) a current estimate of the population at the receiver site, 3) soil conditions at both the impact site and the receiver site, 4) methods of collecting corms; 5) method of planting corms; and, 6) a process for quantitative monitoring of the species.
- f) The Department recommends against using cumulative counts, where the previous year's counted plants, are added to the current year's counted plants. Each year's count should be a stand-alone number used to assess population trends. Population trends can be better assessed by counting the number of plants; flowering, fruiting, or only displaying vegetative growth, in both a proposed mitigation site as well as a reference site, with demonstrated recruitment being a major component of any proposed success criteria.
- g) A major factor in determining success of reintroductions or transplantations includes knowledge of genetics and breeding systems for the target plant. Projects that transplanted plants from a stable population (non-decreasing) had a better success outcome. Incorporating demographic status and genetic information of source populations as well as any receptor populations (existing populations proposed to be enhanced' by adding new plants) can influence reintroduction outcomes (Godefroid, S., et al., 2010).
- h) Since transplantation projects have a poor success rate, and monitoring and adaptive management can drag on for decades without success criteria being met the MND should identify a funding mechanism, and responsible party, to ensure there is adequate money in reserve for additional years of monitoring, and, if needed, an alternative mitigation plan if success criteria cannot be met using the firewall translocation proposed in the MND.
- i) The Department recommends as a better mitigation strategy, the preservation of an existing, similarly sized population of Plummer's mariposa lily in perpetuity at another

39-7  
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<p>location, at acreage of no less than 3 acres preservation of occupied habitat for every 1 acre of impact to occupied habitat.</p> <p>j) Transplantation Plans should be monitored and lack of success enforced through the mitigation measures of the EIR. The Department recommends the County consider developing a tracking mechanism for mitigation involving transplantation, to ensure successful completion of CEQA required mitigation for these projects.</p>	39-7 cont'd
<p>5. Mitigation and Monitoring Plan – Mitigation BR-7 states on page 8-61 of the DEIR: “A mitigation monitoring plan that outlines how mitigation measures specified herein shall be implemented and monitored shall be prepared and approved by LADRP prior to award of any grading permit.”</p> <p>Many of the mitigation measures in the DEIR appear to defer further detail to a Mitigation Monitoring Plan (MMP) to be developed after approval of the EIR when there is no opportunity for the public to further comment on the adequacy of the plan. CEQA Guidelines §15126.4, subdivision (a)(1)(8) states formulation of feasible mitigation measures should not be deferred until some future date. The preparation of a MMP should be included in the DEIR for public review and comment, not prepared following close of the CEQA comment period. If this cannot be accomplished at the DEIR level the EIR should explain why.</p>	39-8
<p>6. <u>Impacts from Nuisance Wildlife</u> – Page 8-47 of the DEIR describes Impact 8.6.3.3 and states: <i>“Landfill operation may result in the introduction and success of nuisance wildlife. These species can displace native wildlife. Negative impacts from vectors and nuisance wildlife in general would be reduced through the implementation of the mitigation measure described below. Implementation of the measure would ensure that potential impacts from nuisance wildlife are less than significant.”</i> Mitigation Measures BR-13 on page 8-47 of the DEIR states: <i>“Construction sites and landfill operation shall be kept free of trash and litter. Food-related trash and litter shall be placed in closed containers and disposed of daily. Nuisance wildlife breeding will be discouraged at CCL by excluding cavities in buildings and/or equipment or facilities left idle for more than 6 months.”</i></p> <p>a) The Department concurs with the CCL hygiene measures to discourage nuisance wildlife and further recommends covering landfilled trash with a soil lawyer on a routine basis as an additional mitigation measure for Impact 8.6.3.3.</p> <p>b) The Department recommends avoiding the use of pesticides or other measures that will result in injury or mortality of native species either directly or through secondary exposure.</p>	39-9
<p>7. <u>Western Spadefoot (<i>Spea hammondi</i>) Impacts and Mitigation Measures</u> - Page 8-50 of the DEIR states: “Western Spadefoot potential aquatic habitat/seasonal pools are present at CCL that could support western spadefoot.” The DEIR describes several mitigation measures (BR-7 through BR-12) and concludes that these measures will result in less than significant impacts to spadefoot. BR-7 states: “A mitigation monitoring plan that outlines how mitigation measures specified herein shall be implemented and monitored shall be prepared and approved by LADRP prior to award of any grading permit.”</p> <p>a) See comment above on deferred mitigation.</p>	39-10

- b) The proposed mitigation measures do not provide survey efforts for spadefoot and adequate detail on how occupied spadefoot habitat, including breeding pools and upland habitat will be avoided or mitigated below a level of significance.
- c) The Department recommends that spadefoot surveys be conducted within all suitable habitat including depressions capable of holding water during an average rainfall year and uplands within 1,000 feet of any of these depressions that will be impacted by the Project. To maximize detection, spadefoot surveys should be conducted several times during the rainy season and only when enough rain has fallen to initiate any potential spadefoot breeding activity on the Project site as demonstrated by existing known occupied spadefoot reference sites near the Project site. If spadefoot is determined to be utilizing any depressions capable of supporting breeding habitat, these occupied depressions and adjacent uplands within 1,000 feet of these depressions should be avoided. If avoidance is not feasible, a spadefoot mitigation plan should be produced that includes salvage of spadefoot and translocation into created on site or site adjacent breeding pools surrounded by no less than 1,000 feet of suitable adjacent upland habitat. The spadefoot plan should be conditioned by the lead agency and submitted to the lead agency and Department for written approval early within the planning process prior to project initiation. Breeding pools and adjacent appropriate upland habitat should be protected in perpetuity under a conservation easement and managed by a local land conservancy to assure that the pools and uplands are maintained in a manner that maximizes persistence of spadefoot within these designated mitigation areas. The spadefoot plan should include provisions for long term management and should include a funding source to assure that any mitigation pond and upland habitat are inspected on an annual basis prior to the rainy season so that appropriate corrective measures can be taken to perform repairs or other management practices to assure spadefoot mitigation habitat function in perpetuity.

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8. Coast Horned Lizard (*Phrynosoma blainvilli*) Impacts - The DEIR states on page 8-51: *"This species may be associated with dry wash, coastal scrub, or chaparral habitats at CCL, although focused surveys did not identify individuals or sign of this species. However, extensive harvester ant mounds are present that provide good forage for this species. Direct, permanent loss of habitat for this species would occur from grading and filling activities. Heavy vehicle traffic and other associated construction impacts could also result in direct mortality or injury of the species. These impacts are considered to be adverse but less than significant, because these populations occur in other areas of their geographic range, and impacts from the Proposed Project are not likely to substantially lower the regional populations of this species below a viable level. In addition, given the relatively small acreage of impacts and availability of alternate large areas of such habitat, locally and regionally, potential impacts to these habitats are considered less than significant."*
- a) Without further information, the Department considers the Project to have a potential cumulative significant impact on CHL. Please include the following information to assist the lead agency in further analysis of assumptions made in the DEIR regarding CHL impacts from the Project.

39-11

- b) The DEIR should state within the impact significance assessment section for CHL, the number of acres of CHL habitat to be lost from the Project to better evaluate level of Project habitat loss and regional impact significance.
- c) The DEIR should include reference sources substantiating CHL populations in the area surround the Project and within the Project site.
- d) Lacking focused survey efforts, the DEIR should further explain how assumptions that areas of habitat surrounding the Project area will continue to provide habitat for CHL and remain undeveloped or that other project proponents will be responsible for CHL protection measures in the future, thereby reducing CHL impact on the Project site.
- e) It has been documented that wildlife habitat located within 200 meters of areas infested with Argentine ants (*Linepithema humile*) were more likely to have been invaded (Fisher, Mitrovich, Matsuda and Pease. 2010). The Department is concerned that the Project may introduce exotic Argentine ants onto the project site and adjacent areas, thus further reducing CHL habitat by eliminating native ant populations, the major food source for CHL. Argentine ants can also adversely impact native birds by killing eggs and chicks in the nest.
- f) Project induced infestation of Argentine ants into unoccupied habitats within the Project site and adjacent areas should be considered significantly cumulative under CEQA.
- g) The presence of native harvester ants, the main food source for CHL, exists on the Project site and potentially in adjacent areas referenced in the DEIR as supporting CHL habitat and contributing to the less than significant conclusion in the DEIR. If the Project site supports Argentine ants, the Department recommends a 200 meter buffer adjacent to uninfested habitats on and adjacent to the Project site within which no artificial water sources hardscapes or landscape plants not inspected for exotic ant infestation shall be introduced.

39-11  
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9. Coastal California Gnatcatcher (Gnatcatcher) (*Poliioptila californica Californica*) - Page 8-51 or the DEIR states: "Marginal, potential nesting habitat for this species occurs in the form of Riversidean coast al sage scrub, and where adjacent to sage scrub, southern mixed chaparral habitat. There are no known records of observance documented within 5 miles of CCL. If gnatcatcher are present at CCL, the loss of occupied habitat, individuals, or nests of this species would represent a significant adverse impact. Designated critical habitat for gnatcatcher occurs over 5 miles south and south east of CCL; however, no impacts to designated critical habitat would occur from the Proposed Project."

39-12

On October 10, 2007, a single Gnatcatcher was observed not far from the Project site at the Newhall Valencia Commerce Center project site following a CAGN survey by Dudek Consulting. See: <https://www.google.com/search?q=Commerace+Center+California+Gnatcatcher&ie=utf-8&oe=utf-8&aq=t&rls=org.mozilla:en-S:official&client=firefox-a&channel=np&source=hp>. The Department recommends U.S. Fish and Wildlife Service (USFW) level protocol surveys for Gnatcatcher within appropriate habitat and further consultation with USFW regarding this species if found on or adjacent to the project site. Mitigation measures resulting in avoidance, restoration and enhancement of CSS habitat on the project site will facilitate Gnatcatcher persistence in this part of its range.

10. Special Status Raptor Species - Page ES 13 of the DEIR describes that the Project would result in approximately 276 acres of permanent vegetation impacts throughout the life of the landfill. Page 8-54 describes that additional approximately 125 acres of grassland habitat would be lost and would represent a significant adverse impact to special status raptor species.

Page 8- 51 of the DEIR states:

*"CCL does not support nesting habitat for California condor but "does support potential forage habitat for this far ranging species. The Proposed Project may render the site unsuitable for condor foraging due to construction and/or operation activities; in general, condors are expected to avoid the area due to current operational activities. Given the large extent of foraging habitat in the region and the wide-ranging nature of the species, the loss of this area as potential forage would not represent a significant impact."*

39-13

- a) Raptors utilize a variety of vegetative communities on which to forage including grasslands. The Department recommends a no less than 0.5:1 replacement mitigation ratio for the loss of 276 acres of permanent Project related vegetation loss of raptor foraging habitat.
- b) Landfills may be considered an attractive nuisance for raptor species and result in potential injury and mortality. California condor (*Gymnogyps californianus*) and turkey vulture (*Cathartes aura*) may be attracted to food sources provided by landfills including animal carcasses and food wastes. Other raptor species can also be drawn to landfills that support rodent populations. The DEIR should describe how this potential hazard will be avoided such as capping exposed wastes on a regular basis so as not to attract scavenging wildlife or making food available for scavenging raptors.

11. Burrowing Owl (*Athene cunicularia*) – In addition to other special status raptor species referenced in the DEIR, the DEIR on page 8-53 describes that grassland habitat at CCL provides limited potential breeding and foraging habitat for burrowing owl and concludes:

*"This impact, although adverse, would not be significant, because the landfill represents marginal habitat and higher quality habitat is present elsewhere in the area. To avoid direct impacts to nesting birds, avoidance and mitigation measures described in this section would be implemented. With these measures, no significant impacts to burrowing owl would be anticipated."*

39-14

Impacts to occupied breeding and wintering habitat for burrowing owl should be considered a direct and cumulative significant impact. To maximize detection of burrowing owl on and adjacent to the project site and assess impact avoidance and mitigation for unavoidable impacts, the Department recommends that the lead agency condition adherence to the Department's survey and mitigation protocol found within the 2012 *CDFW Staff Report on Burrowing Owl Mitigation*. Website: <http://www.dfg.ca.gov/wildlife/nongame/docs/BUOWStaffReport.pdf>. These guidelines further clarify consideration for habitat mitigation lands for burrowing owl and assist in reducing impact to burrowing owl and their habitat to less than significant levels. All mitigation lands should be protected in perpetuity and managed by a local land conservancy.

12. Impacts to San Diego Desert Woodrat (woodrat) (*Neotoma lepida intermedia*) – Page 8-54 or the DEIR states: “CCL provides a moderate potential for occurrence of this species in chaparral and other scrub habitats. Grading and filling activities from the Proposed Project would result in direct, permanent loss of habitat. Some direct mortality of these species also might occur during construction. The loss of these communities would represent adverse but less than significant impacts to the species, given that substantial acreage of such habitats occur regionally. The impacts would not be expected to reduce local populations below self-sustaining numbers.

a) Minus focused surveys on the Project site to determine woodrat presence, population level, and the moderate potential for its occurrence, the Department considers Project loss of this species a significant cumulative impact. woodrat is considered a species of special concern because of incremental habitat loss throughout its range and the Project may contribute to this loss unless focused surveys prove negative for this species.

b) To humanely encourage woodrat abandonment of unavoidable Project impacts to occupied nest sites and mitigate impacts to this species’ habitat, new habitat on adjacent areas not impacted by the Project should be created. This can be done by providing vertical structure by laying downed or cut trees stacked horizontally in areas that are under a shady canopy or piling rocks to achieve this structure. It is important that the structures are under shady areas or they will not be used. These areas should be in locations that do not presently provide this habitat structure so there is at least some creation of habitat and no competition with existing woodrats in the area. This may be done in conjunction with other habitat creation or restoration on the Project site if feasible, or adjacent off site areas that can be used. After creating woodrat habitat, project impact footprint habitat on the project site around occupied woodrat nest structures should be cleared to the extent that no habitat is left on site that woodrats can escape into. Occupied woodrat nests should then be nudged with a front end loader to cause woodrats to abandon the nest and run out into adjacent off site cover. The abandoned woodrat nest structure should then carefully and slowly picked up with a front end loader to allow any additional woodrats to escape and so no humans need to touch or get too close to the nest to reduce health hazards to the workers. The structure is then moved to the creation area and the woodrats after regrouping will find the structure and usually scavenge the material and build new nests in the newly created structure of the piled up trees.

39-15

13. Impacts to Bats - Page 8.55 of the DEIR describes potential project impacts to special status bat species and explains that the project would result in the loss of potential foraging and rock crevasse roosting habitat. However the DEIR concludes that impacts to special status bat species would be unknown because bat surveys have not been conducted. The DEIR further states: “In addition, because abundant sandstone outcrops occur in the mountains and ridges of this region, roost sites for bats that use small crevices and caves would not be considered limiting. As such, the loss or abandonment of roost locations is not anticipated to represent a significant impact.”

a) The Department does not concur with the conclusion in the DEIR that loss of occupied bat roost crevasse, or any other bat roost habitat on the Project site is a less than significant impact. The DEIR assumes, without documentation, that any occupied bat roost habitat outside the project impact area will not be developed in the future and

39-16

places habitat loss mitigation onto future project proponents. The Department has determined that Project removal of occupied bat roosts for special status bat species should be considered a direct and cumulative significant impact and a significant cumulative impact for loss of occupied bat roosting habitat for all other bat species. Habitat supporting potential bat roosts should be considered occupied if bats are observed entering, leaving or residing within roost habitat. Bat roost habitat should also be considered occupied if evidence of bat use is observed regardless of the direct detection of bats at the time of the survey.

- b) If the Project cannot avoid the permanent destruction of occupied bat roosts, appropriate mitigation could include preservation and protection in perpetuity of occupied bat roost habitat on the project site or off site acquisition and protection in perpetuity of off-site occupied bat roost. Mitigation land should be managed in perpetuity by a local land conservancy.

14. Bats Surveys - In addition to performing preconstruction surveys as described in Mitigation Measure BR-2 and construction monitoring described in Mitigation Measure BR-3, Mitigation measure BR-20 on page 8- 55 of the DEIR describes specific mitigation measures for Project impacts to bats.

- a) The Department concurs that measures should be taken to perform focused bat surveys and avoid activities that may disrupt bat roosts or result in bat mortality or injury. Avoidance measures should be performed for all bat species and not limited to special status bat species identified in the DEIR because bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish and Game Code Section 4150, \*California Code of Regulations, Section 251.1).
- b) In addition to protective measures described in the DEIR for bats utilizing crevasses as habitat, the Department recommends that if any project related trees are to be removed, a two-step process for any tree removal that cannot be avoided (to avoid direct mortality of roosting bats). This involves removing all branches less than two inches in diameter from trees that will be removed (to create a disturbance that will encourage bats to choose another roosting site after foraging that night). The following day the tree is completely removed.

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15. Protective Measures for Wildlife during Site Preparation - The project will result in the loss of 276 acres of vegetation habitat for biological resources from vegetation and ground disturbances.

Phased vegetation removal and other ground disturbance activities may leave temporary islands of habitat which create a false sanctuary for wildlife species attempting to escape being injured or killed during project site preparation. These animals are then vulnerable to being killed or injured by the subsequent grubbing and grading of this remaining island habitat. Any grubbing, grading or other ground disturbance activities on the Project site should be done in a manner that encourages mobile wildlife species to leave the project site to escape safely into immediately adjacent habitat off-site. Humane consideration of wildlife during site preparation, in conjunction with an on-site biological monitor to salvage and relocated species of low mobility off the project site onto adjacent habitat not impacted by

39-17

<p>the project, should assist in assuring that needless loss of wildlife does not occur as a result of the Project.</p>	39-17 cont'd
<p>16. <u>General Native Bird Avoidance</u> – MM BIO-5 describes protective measures for native birds during project construction. Table 1-2 of Appendix E-1 lists 30 bird species that were observed on the Project site. One measure includes avoidance of the bird nesting season described as occurring between February 1 through September 15. Another measure involves conducting pre-construction surveys by a qualified biologist if the project cannot avoid the nesting season.</p> <p>a) Considering the project size and amount of habitat, the observation of only 30 bird species appears minimal considering the time of year when the one bird survey was conducted in 2002.</p> <p>b) The Department concurs that measures should be taken to avoid project impacts to nesting native birds. Please adhere to the attached Department's bird nesting avoidance measures that recommends a bird nesting avoidance window as early as January 1 for raptor species to assist in take avoidance of birds or their eggs or nests.</p>	39-18
<p>17. <u>Fencing Impacts</u>. The DEIR describes that perimeter fencing will be erected around the project site.</p> <p>Birds and reptiles seek out hollow metal fence posts in which to reside and then may become trapped, resulting in mortality. Hollow fence posts should be capped to avoid this hazard. Raptor's talons can become entrapped within the bolt holes of metal fence stakes resulting in mortality. Metal fence stakes should be plugged with bolts or other plugging materials to avoid this hazard. Further information on this subject may be found at: <a href="http://kern.audubon.org/death_pipes.htm">http://kern.audubon.org/death_pipes.htm</a>.</p>	39-19
<p>18. <u>Jurisdictional Delineation</u> - Section 8.6.3.2 starting on page 8-46 of the DEIR:</p> <p><i>“Potential impacts to USACE and CDFW jurisdictional areas could potentially be permanently impacted from grading and filling activities. Prior to initiation of permitting, a delineation report would be prepared to identify the presence of jurisdictional areas. In the event that any jurisdictional areas are confirmed at CCL, potential losses would include riparian vegetation associated with seasonal washes, including mule fat scrub, Mexican elderberry, and potentially scattered Fremont cottonwood. The permanent loss of CDFW and USACE jurisdictional areas would be considered a significant impact. Impacts would be quantified during the permitting process and mitigation for potential impacts would be required as a part of the permitting process.”</i></p> <p>a) The Department concurs that a Lake or Streambed Alteration Agreement (LSAA) may be required between the Department and the Project applicant for unavoidable Project impacts to CDFW jurisdictional waters of the state. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) or a river or stream or use material from a streambed, the project applicant (or “entity”) must provide written notification to the Department pursuant to Section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a (LSAA) is required. The</p>	39-20

Department's issuance of a LSAA may be a project that is subject to CEQA. To facilitate our issuance of the LSAA the Department as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) document for the project.

- b) It is the Department's opinion that the project as described, will not mitigate for impacts to biological resources to less than significant levels. To minimize additional requirements by the Department under CEQA the EIR should fully identify the potential impacts to all stream and riparian resources and any listed species and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSAA. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. The Department recommends designing the project footprint to avoid the necessity of performing fuel modification within Department jurisdiction and providing at least a 100 foot natural buffer adjacent to any delineated jurisdictional stream on site. The Department may condition further measures in the LSAA that are designed to mitigate for unavoidable project impacts to riparian resources. These measures may include on site or off site preservation and protection in perpetuity under a conservation easement of riparian habitat to be managed by a local land conservancy.
- c) Further information on the Department's Lake and Streambed Alteration Program and initiating a Department streambed jurisdiction determination may be found at: <http://www.dfg.ca.gov/habcon/1600/>. LSAA Agreement Notification forms and form completion instructions may be found at: <http://www.dfg.ca.gov/habcon/1600/forms.html>.

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19. Impacts to Groundwater Resources – Page 8-46 of the DEIR states:

*“Additional impacts may potentially occur in waterways from construction or operational changes to water quality. Permanent sediment basins are present along all drainages at CCL prior to discharging offsite. These basins capture and retain water quality contaminants with sediments. CCL provides periodic clearing and cleaning of sediment basins. Contaminants captured within these basins are carried away and disposed of within portions of the landfill during maintenance. The operation and maintenance of these basins provides additional mitigation for water quality impacts. With mitigation, potential impacts are anticipated to be less than significant.”*

Section 6 of the Hydrology and Water Quality Section of the DIER includes the MMRP, which describes measures that will be implemented to protect groundwater quality including the installation of additional groundwater monitoring wells and sediment pond liners.

The Department concurs that BMPs including groundwater monitoring and appropriate liners should be included in the MMRP to avoid, monitor and remediate contamination of ground water from Project site contaminants. The EIR should clearly state if these proposed measures will assure that no contamination harmful to biological resources will be allowed to enter waters of the state that are hydrologically connected to groundwater which receives runoff sources originating from the Project site. This concern is relevant to biological resources and should be discussed from that perspective in further detail within the Biota Report Appendix E-1 of the EIR.

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Ms. Iris Chi  
Los Angeles County Department of Regional Planning  
September 23, 2014  
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We appreciate the opportunity to comment on the DEIR for the project and to assist in further minimizing and mitigating project impacts to biological resources. If you have questions regarding this letter, please contact Mr. Scott Harris by telephone at (626) 797-3170 or email at [Scott.P.Harris@wildlife.ca.gov](mailto:Scott.P.Harris@wildlife.ca.gov).

Sincerely,



Betty J. Courtney  
Environmental Program Manager I  
South Coast Region

cc: Erinn Wilson, CDFW, Los Alamitos  
Kelly Schmoker, CDFW, Laguna Niguel  
Scott Harris, CDFW, Pasadena  
Brock Warmuth, CDFW, Newbury Park  
Karen Drewe, CDFW, San Pedro  
Roger Root, U.S. Fish and Wildlife Service, Ventura

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# Letter No. 39

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Department of Fish and Wildlife  
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## Response to Comment No. 39-1

Please see Topical Response #18 for a discussion of Project Alternatives.

## Response to Comment No. 39-2

Comment acknowledged.

## Response to Comment No. 39-3

Please see revised Chapter 8, Biological Resources, of the Partially Recirculated Draft EIR. Mitigation Measure BR-10 has been expanded to include a detailed discussion of preconstruction surveys for special-status wildlife species in impact areas. Please also see Topical Response #2, Biological Resources, which describes changes made to the Biological Resources chapter between the Original Draft EIR and the Partially Recirculated Draft EIR, particularly in response to comments made by the California Department of Fish and Wildlife (CDFW).

## Response to Comment No. 39-4

Please see the revised Biological Resources chapter from the Partially Recirculated Draft EIR, which includes the results of rare plant surveys conducted in 2016. Please also see Topical Response #2, Biological Resources, which describes changes made to the Biological Resources chapter between the Original Draft EIR and the Partially Recirculated Draft EIR, particularly in response to comments made by CDFW.

## Response to Comment No. 39-5

Please see the revised Biological Resources chapter from the Partially Recirculated Draft EIR, which reflects the vegetation classifications found in the Second Edition of *A Manual of California Vegetation* (Sawyer, J.O., T. Keeler-Wolf, and J. Evens, 2009). Please also see Topical Response #2, Biological Resources, which describes changes made to the Biological Resources chapter between the Original Draft EIR and the Partially Recirculated Draft EIR, particularly in response to comments made by CDFW.

## Response to Comment No. 39-6

Please see the revised Biological Resources chapter from the Partially Recirculated Draft EIR, which includes the results of rare plant surveys conducted in 2016. The chapter revised Mitigation Measure BR-9, which includes a Rare Plant Relocation Plan to be prepared in coordination with CDFW.

## Response to Comment No. 39-7

Please see the revised Biological Resources chapter in the Partially Recirculated Draft EIR, which includes the results of rare plant surveys conducted in 2016. The chapter revised Mitigation Measure BR-9, which includes a Rare Plant Relocation Plan to be prepared in coordination with CDFW.

## Response to Comment No. 39-8

All mitigation measures for the Proposed Project were identified in the Original Draft EIR and the Partially Recirculated Draft EIR and are provided in sufficient detail so as not to be considered "deferred mitigation." Additional information about the timing and monitoring responsibilities for each mitigation measure is provided in the Mitigation Monitoring and Reporting Plan included in the Final EIR.

## Response to Comment No. 39-9

Please see revised Mitigation Measure BR-8 of the Partially Recirculated Draft EIR. As an operational best management practice (BMP), CCL covers landfilled trash with soil or other cover material frequently throughout the day.

## Response to Comment No. 39-10

Please see revised Mitigation Measure BR-10 of the Partially Recirculated Draft EIR, which includes preconstruction surveys and relocation requirements for Western Spadefoot. Also see Mitigation Measure BR-16, which addresses potential impacts to Western Spadefoot from regular maintenance activities in the sedimentation basins. Please also see Chapter 8, Biological Resources, of the Final EIR, which includes the implementation and development of a Spadefoot Mitigation Plan to further protect the species at CCL.

## Response to Comment No. 39-11

Please see revised Chapter 8, Biological Resources, of the Partially Recirculated Draft EIR, which addresses potential impacts to San Diego horned lizard and included mitigation measures to ensure that potential impacts are less than significant.

## Response to Comment No. 39-12

Please see revised Chapter 8, Biological Resources, of the Partially Recirculated Draft EIR that references the California gnatcatcher observed at the Newhall Valencia Commerce Center site. Mitigation Measure BR-11 addresses potential impacts to California gnatcatcher.

## Response to Comment No. 39-13

Please see revised Chapter 8, Biological Resources, of the Partially Recirculated Draft EIR. Mitigation Measure BR-1 identifies revegetation of disturbed vegetated areas at CCL at a 1:1 ratio. Mitigation Measures BR-5, BR-9, and BR-15 identify mitigation for special-status vegetation, which may be at a greater than 1:1 ratio.

## Response to Comment No. 39-14

Please see the revised Biological Resources chapter from the Partially Recirculated Draft EIR, which includes preconstruction surveys for burrowing owl in Mitigation Measure BR-10. The revised chapter addresses potential impacts to burrowing owl and includes mitigation measures to ensure that potential impacts are less than significant.

## Response to Comment No. 39-15

Please see the revised Biological Resources chapter from the Partially Recirculated Draft EIR, which includes preconstruction surveys for San Diego desert woodrat in Mitigation Measure BR-10. The revised chapter addresses potential impacts to woodrat and includes mitigation measures to ensure that potential impacts are less than significant.

### Response to Comment No. 39-16

Please see the revised Biological Resources chapter from the Partially Recirculated Draft EIR, which includes an expanded discussion of bats and potential impacts to bats. Mitigation Measure BR-10 includes preconstruction surveys for bats and Mitigation BR-14 addresses direct or indirect impacts to occupied roost sites, including having a bat biologist acceptable to CDFW supervise and report on construction activities with respect to bats.

### Response to Comment No. 39-17

Please see the revised Biological Resources chapter from the Partially Recirculated Draft EIR. This comment has been incorporated into Mitigation Measure BR-10.

### Response to Comment No. 39-18

Please see the revised Biological Resources chapter from the Partially Recirculated Draft EIR. This comment has been incorporated into Mitigation Measure BR-13.

### Response to Comment No. 39-19

Please see the revised Biological Resources chapter from the Partially Recirculated Draft EIR. This comment has been incorporated into Mitigation Measure BR-12.

### Response to Comment No. 39-20

The EIR has identified potential impacts to stream bed and bank and/or riparian resources under Section 1600 et seq. of the California Fish and Game Code or *California Environmental Quality Act* (CEQA). Precise impacts to these resources will be defined once specific phases of the Proposed Project are designed for implementation. At each point that phases are designed, resources will be formally delineated, impacts assessed, and application for a Lake and Streambed Alteration Agreement (LSA) made. Because specific phases of the Proposed Project are not yet developed, and will be developed and implemented over the life of the Proposed Project. Because an LSA or a supporting formal delineation will have a limited shelf life, all impacts cannot be fully identified (or permitted) at this time. Adequate avoidance, mitigation, monitoring and reporting commitments will also be identified when application for the LSA(s) is made.

Please see revised Chapter 11, Biological Resources, of the Partially Recirculated Draft EIR. Mitigation measures have been expanded or added to help ensure that potential impacts to biological resources at CCL have been mitigated to a less than significant level.

### Response to Comment No. 39-21

Please see Topical Response #30 for a discussion of Water Quality.





# South Coast Air Quality Management District

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#40

SENT VIA USPS AND E-MAIL:

September 23, 2014

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Ms. Iris Chi, Project Planner  
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Department of Regional Planning  
Zoning Permits North Section, Room 1348  
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**Draft Environmental Impact Report (DEIR) for the Proposed Chiquita Canyon Landfill  
Master Plan Revision - Project No. R2004-00559-(5); Conditional Use Permit No.  
200400042; Environmental Assessment No. 200400039; and SCH No. 2005081071)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report (Final EIR).

The proposed project includes different construction and operational elements at the existing Chiquita Canyon Class III Landfill located in unincorporated Los Angeles County near the City of Santa Clarita. Development will include a new entrance off of State Route 126; a lateral extension/expansion of the existing footprint by 143 acres (from 257 to 400 acres) and an increase in height by 133 feet (to a maximum elevation of 1,573 feet); development of a Household Hazardous Waste Facility (HHWF); continuation of a mixed-organics composting operation; and the relocation of an existing Southern California Edison (SCE) transmission line. The landfill will be open 24 hours per day but would close from 5:00 PM on Saturday to 4:00 AM on Monday. The HHWF will be open seven days per week 24-hours per day for processing, operations and maintenance, but is open seven days per week between 6:00 AM to 8:00 PM for delivery of material by the general public. The mixed-organics composting facility is currently permitted to receive up to 560 tons per day and will operate seven days per week, 24-hours daily. The total number of employees working at the facility each day would increase from 25 to 50 people total including administrative staff. The number of equipment operating at the site would also increase by 15 to 20 pieces per day from the existing number. Peak daily inbound and outbound traffic from transfer vehicles, collection trucks, other commercial hauler vehicles and the general public is estimated to increase by 594 vehicles. The construction of landfill cells will occur approximately every 18 months to five years over the life of the project beginning in 2016. The proposed project would also increase daily and weekly disposal tonnage from 6,000 to 12,000 tons per day and 30,000 to 60,000 tons per week with a 21-year life beginning in 2016 ending in 2037.

The SCAQMD staff has concerns about the assumptions used in the air quality analysis. These concerns include not documenting or analyzing wind patterns that affect offsite transport of

40-1

Ms. Iris Chi,  
Project Planner

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September 23, 2014

landfill odors that could result in potential complaints from nearby sensitive receptors, i.e., residents living near the project site. Next, the DEIR does not analyze how geotechnical activity could affect the landfill gas collection and control systems that could lead to odors and emissions escaping into the atmosphere. In addition, there are concerns about the air quality analysis including the control efficiency assumptions used to estimate operational emissions from the landfill gas collection system and long-term air quality impacts from surface emissions and flaring. Further, there are recommendations to re-analyze project impacts described in the attachment for daily CEQA impacts, modeling, and risk in order that nearby sensitive receptors are not adversely effected by potentially significant project impacts. Finally, recommendations are made by SCAQMD staff to mitigate potentially significant project impacts per CEQA Guidelines §15126.4. Further details are listed in the attachment.

40-1  
cont'd

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

40-2

Sincerely,



Edward A. Eckerle  
Program Supervisor  
Planning, Rule Development & Area Sources

LAC140815-05  
Control Number

EE:EP:CT:DJ:JB:GM

### Chapter 11 – Air Quality

1. In 11.3.2 - Climate and Meteorology, and in 11.6.3, Impact AQ – 10, and 3.2.9 - Cumulative Impacts, the DEIR does not document or analyze wind patterns at the Chiquita Canyon Landfill (CCL), including wind direction, flow patterns, wind speed, time changes, funneling effects, seasonal changes, alternative conditions (e.g. Santa Ana) etc. This analysis is important for analyzing the potential for the offsite transport of odors and resulting odor complaints from nearby receptors. In Appendix H - Air Quality, the report states that, “sensitive receptors are generally located upwind of the landfill.” The terms “upwind” and “downwind” will depend on the time of day or night. If the current receptors are upwind at any time, the future receptors in the Landmark Village and Homestead Village areas will be downwind, and vice versa.

Interplaying with the sources of odors from the landfill, are the wind patterns, both regionally and locally. Generally, during the day, as the land heats up from the sun, the winds are from the ocean heading generally northward. At night as the land cools down, the winds are from the north, toward the ocean. Cool air in the mountain areas flows down the canyons in the nighttime. These general patterns (alternative patterns can be created by e.g. Santa Ana conditions) can have specific effects on landfill odor and their impact on complainants. For instance, at Sunshine Canyon Landfill (SCL) which is close to Chiquita Canyon, trash odors from the working face impact the community to the south of SCL mostly only in the early morning hours. Nighttime odors are almost exclusively from landfill gas.

40-3

Landfill odors that impact complainants mostly are either trash odors from the working face or landfill gas odors from gas escaping from the landfill surface. (Odors occasionally can come from leaking or mishandled leachate, or from greenwaste or compost if used or produced at the landfill.) Trash odors from the working face are usually detected in the daytime when the daily cover is peeled back, trash in the landfill exposed, and new trash is brought in and placed at the working face. Usually, trash odors from the working face mask landfill gas odors from gas escaping from the landfill surface. Gas escaping from the landfill surface may occur at anytime, and if the collection and control system is inadequate / undersized to collect and control landfill gas, then escaping landfill gas from the landfill surface will occur continuously. Nighttime landfill odors are usually landfill gas odors because disposal activities there have ceased and the working face has been covered for the night.

From January 1, 2014, through September 8, 2014, SCAQMD has received 146 complaints alleging odors from CCL as the source. Approximately 58 percent of those complaints were phoned in during SCAQMD off-hours or at night. Approximately half of the total 146 complaints received were resolved by phone and/or investigated the next SCAQMD business day. Of those complaints that were timely responded to and investigated by SCAQMD field inspection staff, no odors were actually verified with the complainant(s) at their location. However, it should be noted that SCAQMD field staff have detected landfill associated odors elsewhere in the adjacent community during approximately 20% of the complaint investigations.

<p>Due to the nature of wind patterns in the area and the significant number of odor complaints received, a more detailed discussion and evaluation of the wind patterns and their affect on odor impacts from the proposed project on nearby residences is necessary and should be included in the Final EIR.</p>	<p>40-3 cont'd</p>
<p>2. The DEIR's Geotechnical Investigation, Master Plan Revision, states that the "site may be developed as planned, provided our recommendations are incorporated in the design of the project", and that "requirements of the Los Angeles County Building Code are followed." The SCAQMD staff is concerned that the discussion lacks any analysis on ways that geotechnical activity, including above and underground landslides and other instability, can affect the landfill gas collection and control systems. Following the recommendations of the authors and Los Angeles County are important for ensuring the operation of the landfill collection and control systems and thereby preventing emissions, including odors, escaping to the atmosphere. The Lead Agency should include a discussion of how geotechnical activity could potentially impact air quality, including impacts on the landfill collection and control systems of the proposed project.</p>	<p>40-4</p>
<p>3. In 11.5.1.1, a statement is made that the landfill gas collection system achieves 85% efficiency (based on a Golder &amp; Associates study cited in Appendix H). The Lead Agency did not include this study in the DEIR so the SCAQMD staff could not verify its accuracy or substantiate its findings. Due to the fact that the collection system efficiency has significant consequences on surface air quality emission impacts, and that the default collection efficiency factor based on state and federal regulatory guidance is 75%, The Lead Agency should revise this collection efficiency percentage from 85% to 75% in the Final EIR and recalculate all affected results.</p> <p>According to the DEIR Section 11.6.3.2, the operational emission impacts are stated to be less than significant. This impact determination should be revisited if the quantified operational emission from surface landfill gas, due to the revised collection efficiency, changes the result such that the operational emissions exceed the significance thresholds.</p> <p>Section 11.6.3.2 of the DEIR also states "Even though operational emissions from NOx are above the mass daily emission threshold for 2032, this emission scenario represents maximum potential daily emissions, which were estimated using conservative assumptions and are not anticipated to occur every day of the year. Due to the flares' location in the middle of the site, a buffer would exist between the emission source and potential offsite receptors." This statement is confusing and does not adequately explain why operational regional NOx emissions for 2032 (Table 11-9c) would not be expected to occur every day of the year given the continuous gas generation and operation of the landfill gas collection and control system and the nearly every day (312 days per year) land-filling activities. The SCAQMD staff recommends removing or revising this statement to better explain why the location of the flare to that of potential off-site receptors has any impact on regional emissions.</p>	<p>40-5</p>

4. The Lead Agency estimates that additional waste trucks (272 more transfer vehicles and 300 more route collection trucks)<sup>1</sup> will be needed to support the proposed increase in permitted maximum daily waste disposal from 6,000 to 12,000 tons per day (also 30,000 to 60,000 tons per week). Although increased emissions from the increase in waste truck trips are included in the air quality analyses for localized and health impacts, those increased emissions were not included in the maximum daily regional operational emission estimate totals in the DEIR.<sup>2</sup> The Lead Agency states that these operational emissions are included in the existing conditions and therefore not calculated in the DEIR<sup>3</sup> citing guidance from the SCAQMD CEQA Air Quality Handbook (SCAQMD Handbook). Although the reference in the SCAQMD Handbook is not clear to SCAQMD staff, the lead agency seems to have based its determination on a displaced truck trip argument or relocated/redirected emissions that is not supported by the SCAQMD staff CEQA Guidance.<sup>4</sup> The Lead Agency's argument presumes that the increase in truck trips due to the proposed project would have occurred somewhere else in the region is incorrect and is not supported by the SCAQMD staff CEQA Guidance or the CEQA statute. The Lead Agency should quantify the emissions from the increase in off-site waste truck trips due to the proposed project and include them in the determination of significance for Impact AQ-5.

40-6

#### **Appendix H - Air Quality**

5. Appendix H.1 and H.2 of the DEIR report the landfill surface and flare emissions. The SCAQMD staff was unable to verify and reproduce the results. Future flare emissions were estimated using a previous source test on existing flares at the project site. However, the source test used was conducted with the flares operating at approximately 50% of its capacity (Appendix H). As a result, the estimated flare emissions may be significantly underestimated. One way to address this issue is to base the flare emissions on pounds per standard cubic feet (lbs/scf) of landfill gas instead of using the direct emission rate in lbs/hr directly from the source test results.

In addition to the flare source test emission result issue discussed above, the flare modeling input parameters for diameter, temperature, and velocity (as per stated on page 2 of 3 of Appendix H2) are not consistent with the information SCAQMD staff has on file for the proposed new flares. According to page 2 of 3 Appendix H2 the input parameters used were: exhaust temperature of 1,720 F; stack diameter of 11.3 feet; and exhaust velocity of 12.5 fps. However, as stated earlier in the DEIR, proposed new flares are identical to the existing flares. Based on SCAQMD records and source test results for the existing flares, the input parameters used should be more consistent with the following flare parameters: exhaust temperature of 1,596.4 F; stack diameter of 12 feet; and exhaust velocity of 15.6 fps.

40-7

Because, the dispersion modeling results and summary of impacts indicate no exceedances of criteria pollutant (except PM10/2.5) and risk thresholds (see Sections 11.6.3.2, 11.9.2, and

<sup>1</sup> Table 2-4 (Summary of Net Change in Peak Potential Daily Inbound and Outbound Traffic with Proposed Project), Page 2-20.

<sup>2</sup> Footnote in Tables 11-9a, 11-9b, and 11-9c - 2016, 2021 and 2032 Proposed Project Operation Emissions.

<sup>3</sup> Section 11.0 Air Quality Section, Page 11-23, Pages 11-23 to 11-24,

<sup>4</sup> SCAQMD CEQA Air Quality Handbook (Handbook), Page 9-8

<p>11.9.3), it is recommended that all assumptions and calculations be reviewed and revised as needed. The revised emissions should be re-analyzed for daily CEQA impacts, modeling, and risk.</p>	<p>40-7 cont'd</p>
<p>6. In Appendix H.1.5, the DEIR references the Bay Area Air Quality Management District (BAAQMD) Air Quality Guidelines (2012) as the mechanism for qualitatively evaluating the significance of possible odor impacts on nearby sensitive receptors. In evaluating the BAAQMD's Step 1 - Disclosure of Odor Parameters, the DEIR does not adequately address the:</p> <ul style="list-style-type: none"><li>• frequency of odor events generated by the odor source (e.g. operating hours, seasonality). Essentially, a landfill generates odors all the days trash is delivered to the working face, and potentially every day and night if the gas collection and control system is not optimally functioning. Also not discussed is that the landfill permitted tonnage will double and, the acreage will increase almost 150 acres and the surface of the landfill will rise, all of which can cause odor emissions to increase or have more impact;</li><li>• distance and landscape between the odor source and receptors. The distances and topography, wind currents, etc. as they will affect odor emission and affect the Landmark and Homestead Village developments is not discussed; and</li><li>• predominant wind directions and speed and upwind downwind location of receptors.</li></ul>	<p>40-8</p>
<p>7. While CCL has not been cited for any nuisance violations since 2006, the project proposes to double the permitted tonnage, increase the surface area of the landfill by 150 acres, and raise the level/elevation of the landfill. Significant development of residences and presumably some schools are anticipated to be built to the south of the facility, such that southward air drainage from cool air at night and from northerly daytime wind patterns could carry trash and landfill gas odors into these new communities and schools. With this scenario in mind, SCAQMD recommends that the Lead Agency establish increments of progress in terms of throughput tonnage such that each increment is granted only if CCL demonstrates that air quality impacts principally in the form of odor impacts are not a burden to the community. The SCAQMD staff notes that this approach was successfully applied to a project involving the Athens Services Transfer Station in the City of Industry.</p>	<p>40-9</p>
<p><b>Localized and Health Risk Affect Modeling Analyses</b></p> <p>8. The DEIR and Appendix H do not contain enough information for SCAQMD staff to determine how the emissions were calculated for each source modeled in AERMOD (for both LST and HRA). The Lead Agency needs to provide more detailed information in the Final EIR, such as sample calculations showing how the project's impacts were estimated, and sample calculations showing how the emissions from CalEEMOD and/or EMFAC were used to determine the emission rates of the sources modeled. Without these details, it is not possible to review the Air Quality impacts stated in the DEIR for accuracy.</p>	<p>40-10</p>

<p>9. The dispersion model and risk summary results listed in Section 11 (Tables 11-7a, 11-7b, 11-8a, 11-8b, and 11-10a to 11-10c) do not match the AERMOD output files provided electronically to SCAQMD. For example, the operational PM10 annual impacts are listed in Table 11-10b as 0.5 mg/m<sup>3</sup>, while the AERMOD output shows the project maximum as 2.76 mg/m<sup>3</sup>. For comparison, SCAQMD's significance threshold for operations is 1.0 mg/m<sup>3</sup>. The Lead Agency needs to ensure that the modeled impacts shown in the Final EIR match the AERMOD output file concentrations and if any additional factors are applied, they need to be explained in detail and sample calculations should be provided.</p>	40-11
<p>10. The proposed project is scheduled to begin construction in 2014 and the DEIR states that cell construction would occur every 18 months to 5 years, based on need. Appendix H, Section H.1.1 of the DEIR states that 2021 was identified as the year which would have the highest emissions from both construction and operation. However, in the DEIR, the project's emissions from either construction or operation were analyzed separately and compared individually to the SCAQMD's respective construction and operation thresholds. Since this project involves a long-term construction period and the construction and operational phases will overlap, the SCAQMD staff therefore recommends that the lead agency determine the worst-case construction and operational daily air quality impact scenario; total the construction and operational emission estimates together; and then compare those totals with the SCAQMD operational daily significance thresholds in the Final EIR. The reasoning is that the proposed 18-year construction period (from 2014 till 2032) is a long period of time making the project 'construction' emissions more similar to an operational profile. Therefore, the use of the more conservative operational daily significance thresholds approach would be more conservative than separating the emissions and comparing the short- and long-term estimates to the respective SCAQMD recommended daily significance thresholds.</p>	40-12
<p>11. Similarly, the health risk assessment (HRA) for the project should also analyze emissions from both construction and operation together, since they are anticipated to occur concurrently for the duration of project. The DEIR used a 9-year exposure duration for construction. However, given that the construction period is actually 16 years long, the 9-year exposure duration is not conservative. The Final EIR should analyze the health risks from both construction and operation of the project together and use an exposure duration that lasts for either 70 years or for the life of the project.</p>	40-13
<p>12. Some of the receptors were placed within the volume source exclusion zone and their results would be invalid. It is recommended that the LST analysis be updated so that no receptors are placed within the volume source exclusion zone either by modeling the roadway as an area source or the volume sources be reduced in size.</p>	40-14
<p><b>SCAQMD Rule 1193 – Clean On-Road Refuse Collection Vehicles</b></p>	
<p>13. The DEIR Section 11.4.3.2 fails to mention compliance with SCAQMD Rule 1193 - Clean On-Road Residential and Commercial Refuse Collection Vehicles. SCAQMD Rule 1193 applies to public and private solid waste collection fleet operators that operating fleets with 15 or more solid waste collection vehicles. The rule requires public fleets, and private fleet</p>	40-15

operators who provide solid waste collection services to governmental agencies, to use alternative-fuel refuse collection and transfer vehicles when procuring or leasing these vehicles in the South Coast Air Quality Management District. The Lead Agency should discuss the applicability and compliance status of the waste trucks used in the proposed project.

40-15  
cont'd

#### **Operation Mitigation Measures**

14. Should the Lead Agency's revised analysis determine that the proposed project will generate significant operational air quality impacts for NOx from on-road mobile sources, beyond the emissions from the on-site flare operations, the SCAQMD staff recommends the following measures in addition to the measures listed on page 11-20 of the DEIR to further reduce significant air quality impacts:

- The Lead Agency needs to consider additional mitigation to reduce the impacts from trucks that utilize the facility that are not subject to SCAQMD Rule 1193. One potential mitigation measures could include requiring a certain percentage of heavy duty diesel waste trucks that regularly use the facility to be 2010 and newer diesel trucks and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1 (recommend sweepers using reclaimed water);
- Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility;
- Have truck routes clearly marked with trailblazer signs so trucks will stay on truck routes established by the lead agency and not enter residential areas; and

40-16

# Letter No. 40

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## Response to Comment No. 40-1

This is a summary of the South Coast Air Quality Management District's (SCAQMD's) comments. Individual SCAQMD comments are addressed by individual comment responses below, and responses are not summarized or repeated here.

## Response to Comment No. 40-2

Prior to adoption of the Final EIR, the Lead Agency will provide SCAQMD with written responses to all comments received.

## Response to Comment No. 40-3

A detailed analysis of local wind patterns at CCL is presented in Section 11.5.2 of the revised Air Quality chapter in the Partially Recirculated Draft EIR. Section 11.5.5 of the revised Air Quality chapter in the Partially Recirculated Draft EIR includes a summary of odor complaints received by SCAQMD and discussion of wind conditions at the time verified odors were reported.

## Response to Comment No. 40-4

Please see page 5-3 of the Final EIR for a discussion of Seismic Design pertinent to the comment. This section states:

**Section 20370, Seismic Design:** Class III Units shall be designed to withstand the maximum probable earthquake (MPE) without damage to the foundation or to the structures which control leachate, surface drainage, erosion, or gas. As required in Section 21750(f)(5), a stability analysis, including a determination of the expected peak ground acceleration of the Unit associated with the MPE for Class III landfills shall be included as part of the report of waste discharge (ROWD) (or Joint Technical Document [JTD]) for the proposed Unit. Section 21750(f)(5) also requires an updated stability analysis be included as part of the final closure and post-closure maintenance plan if the original analysis no longer reflects the conditions at the Unit.

It should be noted that [the Regional Water Quality Control Board] RWQCB previously required that landfills within the Los Angeles Region be designed to withstand the peak ground acceleration (PGA) associated with the maximum credible earthquake (MCE), which is a more stringent requirement than that contained in Section 20370. The MCE is the maximum earthquake that appears capable of occurring under the currently known geologic framework.

Based on the above, the landfill gas (LFG) collection system would be designed and constructed to withstand the MCE without damage. The materials used to construct LFG collection systems are very robust and able to withstand considerable stress without damage. For reference, there was no damage to the LFG collection system due to the Northridge Earthquake. As such, the potential for emissions, including odors, escaping to the atmosphere, are minimized. The LFG collection system instrumentation and control system continuously monitors for excess oxygen in the LFG that would indicate a leak in the collection piping or process components. If excess oxygen were detected, the system would alert the

system operator and shut down the system. In addition, post-earthquake inspections of the landfill and structures will be performed in accordance with the Emergency Response Plan. Therefore, any effects due to geological activity, including air emissions or odors, are expected to be identified and corrected as part of normal operations or emergency response.

It should also be noted that the language in the Geotechnical Investigation related to incorporating the recommendations contained in the Geotechnical Report is standard language that can be found in almost all geotechnical reports. The language is intended to limit the geotechnical engineer's liability in a situation where their recommendations were not followed.

### Response to Comment No. 40-5

The average LFG control system efficiency was updated to 81.7 percent, based upon the averaging method recommended by the SCAQMD and directed for use by the Los Angeles County Department of Public Works. Documentation is available in Appendix H-4 of the Partially Recirculated Draft EIR. Per the Proposed Project best management practice (BMP), the landfill would be operated to improve LFG collection efficiency to a site-wide average of 85 percent through application of a combination of daily cover, intermediate cover, and final cover to provide a beneficial improvement in ongoing LFG collection efficiency. Documentation regarding this BMP is available in Appendix H-3 of the Partially Recirculated Draft EIR. Text in Section 11.6.3.2 was updated for clarity in the revised Air Quality chapter in the Partially Recirculated Draft EIR.

### Response to Comment No. 40-6

At SCAQMD's recommendation, emissions from the increase in offsite waste truck trips due to the Proposed Project were quantified and included in the revised air quality analysis presented in the Partially Recirculated Draft EIR. Detailed methodology and calculations are presented in Appendix H of the Partially Recirculated Draft EIR.

### Response to Comment No. 40-7

Flare emissions and modeling input parameters were updated per SCAQMD's recommendations in the revised air quality analysis presented in the Partially Recirculated Draft EIR. Detailed methodology and calculations are presented in Appendix H of the Partially Recirculated Draft EIR.

### Response to Comment No. 40-8

Additional discussion regarding wind patterns near CCL and potential odor impacts from the Proposed Project was included in the revised Air Quality chapter in the Partially Recirculated Draft EIR, and the Topical Response for Odor, #17, in the Final EIR.

### Response to Comment No. 40-9

In response to the request to have mechanisms in place to quickly address odor complaints and issues, CCL will develop an Odor Impact Minimization Plan (OIMP) for landfill operation. The OIMP will describe an odor monitoring protocol, a description of meteorological conditions that affect migration of odors, a complaint response protocol, a description of design considerations for minimizing odors, and a description of operating procedures for minimizing odors. Development and implementation of an OIMP for landfill operation has been added to the Mitigation Monitoring and Reporting Plan for the Proposed Project, included in the Final EIR.

## Response to Comment No. 40-10

Updated emission calculation files detailing project data, assumptions, and methodology were included in Appendix H-2 of the Partially Recirculated Draft EIR. Updated air modeling files were provided to SCAQMD on December 7, 2016.

## Response to Comment No. 40-11

Updated modeled impacts are presented in the revised Air Quality chapter in the Partially Recirculated Draft EIR, and the updated dispersion model and risk summary results match the updated air modeling files provided to SCAQMD on December 7, 2016. Detailed methodology and calculations are presented in Appendix H of the Partially Recirculated Draft EIR.

## Response to Comment No. 40-12

Per SCAQMD's recommendation, criteria pollutant emissions from construction and operation of the Proposed Project were combined and compared to the SCAQMD operational significance thresholds in the revised Air Quality chapter in the Partially Recirculated Draft EIR. Detailed methodology and calculations are presented in Appendix H of the Partially Recirculated Draft EIR.

## Response to Comment No. 40-13

Please see the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, as well as Topical Response #1, Air Quality, and Topical Response #21, Public Health. Per SCAQMD's recommendation, the health risk assessment presented in the revised air quality chapter in the Partially Recirculated Draft EIR analyzed combined emissions from construction and operation of the Proposed Project. At the recommendation of SCAQMD staff, the HRA was performed following the previous OEHHA guidance outlined in the Air Toxics Hot Spots Program Risk Assessment Guidelines (Office of Environmental Health Hazard Assessment [OEHHA], 2003), and the latest OEHHA guidance outlined in the Guidance Manual for Preparation of Health Risk Assessments (OEHHA, 2015), and SCAQMD health risk assessment guidance.

The revised air quality chapter in the Partially Recirculated Draft EIR presents results obtained through use of both HARP1 and HARP2 models for comparison of the health risks estimated for the Proposed Project to the *California Environmental Quality Act* (CEQA) thresholds. Emissions from both construction and operations of the Proposed Project were averaged over 70- years for use in HARP1 and averaged over 30- years for HARP2. The 70-year exposures duration and 30-year exposure duration are the time periods recommended for use in the OEHHA 2003 and OEHHA 2015 guidance, respectively.

## Response to Comment No. 40-14

Per SCAQMD's recommendation, receptor placement was reviewed, and the five receptors initially placed within the volume source exclusion zone were removed. Updated modeling results were presented in the revised Air Quality chapter in the Partially Recirculated Draft EIR.

## Response to Comment No. 40-15

A summary of Rule 1193 and its requirements for on-road refuse collection vehicles in fleets operated by public and private solid waste collection fleet operators was added to Section 11.4.3.2 of the revised Air Quality chapter in the Partially Recirculated Draft EIR. Note that CCL does not own or operate waste collection trucks. Therefore, SCAQMD Rule 1193 would not be directly applicable to CCL or Waste Connections, Inc.

## Response to Comment No. 40-16

Based on the revised analysis in the Partially Recirculated Draft EIR, the Proposed Project would generate potentially significant air quality impacts for nitrogen oxide. The measures suggested by SCAQMD were considered for feasibility, as follows:

- (A) This measure is not feasible, as CCL does not own or operate waste collection trucks and cannot enforce SCAQMD Rule 1193 or other measures related to waste collection trucks owned and operated by others.
- (B) This measure was included in Section 11.7 of the Partially Recirculated Draft EIR as proposed Mitigation Measure AQ-1.
- (C) The site entrance was designed so that CCL can accommodate all Proposed Project traffic without queuing outside the facility. Additional detail is provided in the traffic analysis prepared for the Proposed Project (Chapter 10 and Appendix G of the Final EIR).
- (D) As stated above, CCL does not own or operate waste collection trucks. Therefore, it is not possible to enforce the use of specified truck routes. However, given the availability of direct routes to and from CCL, it is unlikely that trucks would choose to utilize a residential area either going to or leaving the site.

September 23, 2014

County of Los Angeles  
Department of Regional Planning  
Attn: Iris Chi  
Zoning Permits North Section, Room 1348  
320 West Temple Street  
Los Angeles, CA 90012

E-mail: [ichi@planning.lacounty.gov](mailto:ichi@planning.lacounty.gov)

Subject: Comments on the Deir for Chiquita Canyon Landfill Master Plan Revision

Dear Ms. Chi:

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,



for Tricia Maier, Manager  
Planning Programs Section

Attachments

County RMA Reference Number 11-036-1



## Letter No. 41

Tricia Maier  
Ventura County Resource Management Agency  
800 South Victoria Avenue, L#1740,  
Ventura, CA 93009

### Response to Comment No. 41-1

No response required.



David Ford, Region Manager  
Local Public Affairs  
1000 Portrero Grande Drive  
Monterey Park, CA 91754

September 23, 2014

Iris Chi  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012  
ichi@planning.lacounty.gov

Re: Chiquita Canyon Landfill Master Plan Revision EIR

Southern California Edison (SCE) appreciates the opportunity to provide comments to the Draft Environmental Impact Report (EIR) for the Chiquita Canyon Landfill Master Plan Revision. Chiquita Canyon Landfill (CCL), LLC is proposing the expansion of an existing Class III landfill. The proposed project includes the following elements: development of a new entrance and support facilities; better utilization of the landfills potential disposal capacity through a lateral extension of the existing waste footprint and increased maximum elevation; increased dialing disposal limits; acceptance of all nonhazardous waste permitted at a Class III solid waste disposal landfill; continued operation of the landfill; new design features; environmental monitoring; development of a Household Hazardous Waste Facility; mixed organics composting operation; and set-aside land for potential conversion technology. The proposed project also includes the relocation of a portion of SCE's existing Saugus-Elizabeth Lake-Filmore 66 kilovolt (kV) Subtransmission Line.

In the Draft EIR Section 2.2.1 Entrance and Support Facilities, page 2-5, second sentence, SCE requests the addition of "remove" to the sentence so that it reads:

In order to accommodate the Proposed Project, CCL has requested SCE to **remove** and relocate an approximately 3,260-foot portion of the 66 kV line between the east side of Wolcott Way to a location approximately 880 feet west of the current CCL entrance.

42-1

We have no further comments on the Draft EIR and look forward to working with the County on the proposed project. If you have any questions regarding this letter, please do not hesitate to contact me at David.A.Ford@sce.com or (323) 720-5290.

Sincerely,

David Ford  
Local Public Affairs Region Manager  
Southern California Edison Company

cc: George Perez, SCE  
Karen Cadavona, SCE

## Letter No. 42

David Ford  
Southern California Edison  
Local Public Affairs  
1000 Portrero Grande Drive  
Monterey Park, CA 91754

### Response to Comment No. 42-1

The word "remove" has been added to the referenced sentence in Section 2.2.1 of the Final EIR as requested by Southern California Edison.

**Iris Chi**

---

**From:** Bradley Angel [bradley@greenaction.org]  
**Sent:** Monday, September 29, 2014 4:12 PM  
**To:** Iris Chi; greenaction@greenaction.org  
**Cc:** Paul Mc Carthy; Janai Leeb; Arsenio Mataka; mrodriquez@calepa.ca.gov  
**Subject:** LA County not in compliance with civil rights requirements: Lack of adequate notice and failure to translate permit documents on Chaquita Canyon Landfill

Dear Ms. Chi,

43-1

Unfortunately Los Angeles County is absolutely not in compliance with all requirements, specifically the requirements under Title VI of the US Civil Rights Act and California Government Code 11135 that recipients of state and federal funding such as LA County not take actions that have disparate and discriminatory impacts against Latino and Spanish speakers.

The proposed permit for the Chaquita Canyon garbage dump itself would have a prohibited impact. In addition, the County's failure and refusal to translate even one word of the environmental review document and the refusal to provide notice in the language so many residents speak is a violation of state and civil rights laws.

The county's public review period is not truly public as the county is effectively excluding many members of the affected public from the process. Please be advised that the failure to provide proper notice or to conduct a process accessible to the large percentage of residents who do not speak English will be challenged.

Please include this communication in the record for the public comment period.  
Please also notify us of any and all opportunities for public comment on this project.

Bradley Angel  
Greenaction for Health and Environmental Justice  
559 Ellis Street, San Francisco, CA 94109  
[bradley@greenaction.org](mailto:bradley@greenaction.org)

On 9/29/2014 9:53 AM, Iris Chi wrote:

Mr. Bradley Angel,

Thank you for your comments. We reviewed our processes and we are in compliance with the State's notification requirements. Please note that the public review period has been extended to October 23, 2014.

Notice of Time Extension:

[http://planning.lacounty.gov/assets/upl/case/project\\_r2004-00559\\_eir-notice-ext2.pdf](http://planning.lacounty.gov/assets/upl/case/project_r2004-00559_eir-notice-ext2.pdf)

Thank you,

**Iris Chi, AICP**  
Planner  
Zoning Permits North

Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012  
(213) 974-6443  
<http://planning.lacounty.gov>  
[ichi@planning.lacounty.gov](mailto:ichi@planning.lacounty.gov)



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**From:** Paul Mc Carthy  
**Sent:** Monday, September 29, 2014 9:27 AM  
**To:** Iris Chi  
**Subject:** FW: Lack of adequate notice and failure to translate permit documents on Chaquita Canyon Landfill

## Letter No. 43

Bradley Angel  
GreenAction  
559 Ellis Street  
San Francisco, CA 94109

### Response to Comment No. 43-1

Please see Topical Response #22, Public Scoping and Public Outreach.





# DEPARTMENT OF CONSERVATION

## DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

1000 S. Hill Road, Suite 116 • Ventura, CALIFORNIA 93003

PHONE 805 / 654-4761 • FAX 805 / 654-4765 • WEB SITE [conservation.ca.gov](http://conservation.ca.gov)

September 29, 2014

Mr. Iris Chi  
County of Los Angeles  
Zoning Permits North Section, Room 1348  
320 West Temple Street  
Los Angeles, CA 90012



**Subject: Chiquita Canyon Landfill Master Plan Revision  
SCH # 2005081071**

Dear Mr. Chi:

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California. The Department offers the following comments for your consideration.

Based on information provided in the Specific Plan there are no oil wells located within the existing landfill or proposed lateral extensions. Well locations can be found on the Division's website at [www.conservation.ca.gov](http://www.conservation.ca.gov), go to "Oil, Gas, and Geothermal", and then go to the link "Online Mapping System".

Furthermore, if any plugged or abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements for and approval to perform remedial operations.

The Division also recommends the wells within or in close proximity to project boundaries be accurately plotted on all future maps of this project, and a legible copy of the final project map be submitted to the Division.

The possibility for future problems from oil and gas wells that have been plugged and abandoned, or reabandoned, to the Division's current specifications are remote. However, the Division suggests that a diligent effort be made to avoid building over any plugged and abandoned well.

44-1

**Chiquita Canyon Landfill Master Plan Revision**

**SCH # 2005081071**

Page 2 of 2

To ensure proper review of projects, the Division has available an informational packet entitled, "Construction-Site Plan Review Program. This document is available on the Division's website at [www.conservation.ca.gov](http://www.conservation.ca.gov), go to "Oil, Gas, and Geothermal", then go to "Construction Site Review".

Prior to commencing operations, the project applicant should consult with our office for information on the wells located in the project area.

Thank you for the opportunity to comment on the proposed Chiquita Canyon Landfill Master Plan Expansion. If you have any questions, please contact me at (805) 654-4761 or via email at [bhesson@consvr.ca.gov](mailto:bhesson@consvr.ca.gov).

44-1  
cont'd

Sincerely,



Bruce H. Hesson, P.E.  
District Deputy - Ventura

cc: DOGGR- HQ, Adele Lagomarsino

## Letter No. 44

Bruce Hesson  
Department of Conservation,  
Division of Oil, Gas, and Geothermal Resources  
1000 S. Hill Road, Suite 116  
Ventura, CA 93003

### Response to Comment No. 44-1

Comment acknowledged. Wells will be plotted on future site maps at the time of final map clearance and provided to the Division.





**COUNTY OF LOS ANGELES**

**FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

**#45**

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

October 7, 2014

Iris Chi, Planner  
Department of Regional Planning  
Zoning Permits North  
320 West Temple Street  
Los Angeles, CA 90012

Dear Iris Chi:

**EXTENSION FOR PUBLIC COMMENTS, PROJECT NO. R2004-00559-(5),  
CONDITIONAL USE PERMIT NO. 200400042, "CHIQUITA CANYON LANDFILL,"  
EXTENSION OF THE EXISTING WASTE FOOTPRINT AND INCREASED MAXIMUM  
ELEVATION, INCREASED DAILY DISPOSAL LIMITS, ACCEPTANCE OF ALL  
NONHAZARDOUS WASTES PERMITTED AT A CLASS III SOLID WASTE DISPOSAL  
LANDFILL, 29201 HENRY MAYO DRIVE, CASTAIC (FFER #201400164)**

The Extension for Public Comments has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

**PLANNING DIVISION:**

1. We have no comments at this time.

**LAND DEVELOPMENT UNIT:**

**General Comments:**

- |  |
|--|
| 1. Submit a minimum of four copies of the site plan indicating the new landfill entrance road, new entrance to the facilities area, and the new site entrance. |
|--|

45-1

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- |              |           |                  |                      |           |                      |                       |                  |
|--------------|-----------|------------------|----------------------|-----------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CALABASAS | DIAMOND BAR      | HIDDEN HILLS         | LA MIRADA | MALIBU               | POMONA                | SIGNAL HILL      |
| ARTESIA      | CARSON    | DUARTE           | HUNTINGTON PARK      | LA PUENTE | MAYWOOD              | RANCHO PALOS VERDES   | SOUTH EL MONTE   |
| AZUSA        | CERRITOS  | EL MONTE         | INDUSTRY             | LAKEWOOD  | NORWALK              | ROLLING HILLS         | SOUTH GATE       |
| BALDWIN PARK | CLAREMONT | GARDENA          | INGLEWOOD            | LANCASTER | PALMDALE             | ROLLING HILLS ESTATES | TEMPLE CITY      |
| BELL         | COMMERCE  | GLENORA          | IRWINDALE            | LAWDALE   | PALOS VERDES ESTATES | ROSEMEAD              | WALNUT           |
| BELL GARDENS | COVINA    | HAWAIIAN GARDENS | LA CANADA FLINTRIDGE | LOMITA    | PARAMOUNT            | SAN DIMAS             | WEST HOLLYWOOD   |
| BELLFLOWER   | CUDAHY    | HAWTHORNE        | LA HABRA             | LYNWOOD   | PICO RIVERA          | SANTA CLARITA         | WESTLAKE VILLAGE |
| BRADBURY     |           |                  |                      |           |                      |                       | WHITTIER         |

Additional access requirements may need to be addressed. Indicate all existing fire hydrants on the site plan.	45-1 cont'd
2. The proposed expansion shall comply with Fire Department's Regulation 10 – Combustible Waste Sites. The requirements are listed below.	45-2
3. Any future new development on this property will require additional access and water system requirements.	45-3
4. This property is located within the area described by the Fire Department as "Very High Fire Hazard Severity Zone" (formerly Fire Zone 4). A "Fuel Modification Plan" shall be submitted and approved prior to final map clearance. (Contact Fuel Modification Unit, Fire Station 32, 605 North Angeleno Avenue, Azusa, CA 91702-2904, Phone: (626) 969-5205, for details).	45-4

**Water System Requirements:**

1. A water supply shall be provided which meets the Fire Department standards as determined by the Land Development Unit of the Fire Prevention Division.	45-5
2. Adequate on-site fire hydrants shall be required per Fire Department standards. The future expansion of the facility should be considered when determining the size and placement of water mains and hydrants.	45-6
3. A Class II Standpipe System shall be provided and located within 200 feet of dumping operations and shall have sufficient 1½ -inch hose with a variable-fog nozzle to reach all portions of such operations.	45-7
4. In lieu of a Class II standpipe system, the use of water tender trucks may be permitted, provided each truck is equipped with 2½-inch outlets for fire department use.	

**Access Requirements:**

1. Approved access roads shall be provided and maintained at all times around the dumping areas, and all existing and proposed buildings to access for firefighting equipment as addressed in the Fire Code Chapter 5.	45-8
2. Fire apparatus access roads shall have an unobstructed width not less than 20 feet and an unobstructed vertical clearance clear to the sky.	45-9

- |   |                |
|---|----------------|
| 3. Fire apparatus access road widths may be increased, in the opinion of the chief, when the widths are not adequate enough to provide fire apparatus access. The increase in the fire apparatus access road width may be applied for future buildings. | 45-9<br>cont'd |
| 4. Entrances to roads, trails or other access ways that have been closed with gates and barriers shall not be obstructed by parked vehicles.  | 45-10          |
| 5. The use of traffic calming devices, such as speed bumps, are prohibited unless approved by the fire code official. The use of speed bumps are not permitted as noted in Section 2.2.1 – Relocated Entrance & Support Facilities.                     | 45-11          |
| 6. Weeds, grass and combustible vegetation shall be removed for a distance of 10 feet on both sides of all access roads by rubbish trucks or the public.  | 45-12          |

**Additional Requirements:**

- |   |       |
|---|-------|
| 1. A firebreak or clearance of all dry weeds and grass shall be provided around the dumping areas. Secondary firebreaks, as required by the Fire Department, shall be provided and maintained in order to prevent the spread of the fire beyond the dump facility. The secondary firebreaks shall be not less than 60 feet in width.                                    | 45-13 |
| 2. The property shall be adequately fenced to prevent entry of unauthorized persons, and gates shall be locked at all times when the facility is not supervised. An attendant shall be on duty when the site is open to the public.   | 45-14 |
| 3. “NO SMOKING” signs shall be posted on the facility and at all entrances to the facility. Smoking regulations, as required by this Department, will be strictly enforced.   | 45-15 |
| 4. Dumping operations shall be carried on in such a manner as to minimize the possibility of fires occurring in the waste material. The waste material which is dumped on the premises shall be immediately mixed with earth, and under no circumstances shall any exposed surface or face of combustible materials be left uncovered at the close of daily operations. | 45-16 |
| 5. Any fire which occurs on the premises shall be reported immediately to the Fire Department and it shall be the responsibility of the operator to immediately extinguish any such fire. A telephone shall be installed for the purpose of notifying the Fire Department in case of fire.  | 45-17 |

6. Provisions shall be made to control or prevent the blowing of papers or other combustibles water materials into the brush or outside the established dumping areas. The premises shall be kept free of any accumulations of waste combustible materials, which might constitute a fire menace.	45-18
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7. All Fire Protection facilities, including access and water, must be provided prior to and during construction.	45-19
---	-------

8. If there are any questions regarding these requirements, please contact FPEA, Wally Collins, at (323) 890-4243 or at <a href="mailto:Wally.Collins@fire.lacounty.gov">Wally.Collins@fire.lacounty.gov</a> .	
--	--

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.	45-20
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**HEALTH HAZARDOUS MATERIALS DIVISION:**

1. The Health Hazardous Materials Division has no objection to the proposed project.	45-21
--	-------

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



FRANK VIDALES, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

FV:jl

# Letter No. 45

Frank Vidales  
Los Angeles County Fire Department  
1320 North Eastern Avenue  
Los Angeles, CA 90063-3294

## Response to Comment No. 45-1

The requested information will be submitted during the process of obtaining building permits for the new site entrance.

## Response to Comment No. 45-2

Comment acknowledged.

## Response to Comment No. 45-3

Comment acknowledged.

## Response to Comment No. 45-4

The requested information will be submitted during the building permit process.

## Response to Comment No. 45-5

Comment acknowledged.

## Response to Comment No. 45-6

The requested information will be submitted during Conditional Use Permit (CUP) site plan review.

## Response to Comment No. 45-7

The requested information will be submitted during CUP site plan review.

## Response to Comment No. 45-8

Comment acknowledged.

## Response to Comment No. 45-9

Comment acknowledged.

## Response to Comment No. 45-10

Comment acknowledged.

## Response to Comment No. 45-11

The use of speed bumps at CCL will be reviewed with the Los Angeles County fire code official. Speed bumps at CCL are required by the current CUP as they help to reduce vehicle speeds, onsite fugitive dust, and dirt track-out onto State Route 126.

## Response to Comment No. 45-12

Comment acknowledged.

### Response to Comment No. 45-13

Comment acknowledged.

### Response to Comment No. 45-14

Comment acknowledged. The site is currently fenced to prevent entry of unauthorized persons and the gates are locked at all times when the facility is closed. An attendant is on duty when the site is open to the public.

### Response to Comment No. 45-15

Comment acknowledged. No Smoking signs are posted on the facility and at all entrances to the facility.

### Response to Comment No. 45-16

Final EIR Section 2.2.6.9, Disposal and Cover Procedures, describes the procedure for covering wastes at the close of daily operations. Final EIR Section 2.2.8.8, Nuisance and Health Hazard Monitoring, describes the procedures that minimize the potential for fires occurring in the waste material.

### Response to Comment No. 45-17

Comment acknowledged.

### Response to Comment No. 45-18

Comment acknowledged.

### Response to Comment No. 45-19

Comment acknowledged.

### Response to Comment No. 45-20

The EIR prepared for the Proposed Project addresses potential impacts in the areas identified in the comment.

### Response to Comment No. 45-21

Comment acknowledged.

Iris Chi

**From:** Craig Banta [craigdbanta@yahoo.com]  
**Sent:** Sunday, October 12, 2014 2:50 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon Landfill Draft Environmental Impact Report

Craig Banta  
29027 Elk Avenue  
Val Verde, CA 91384  
(562) 498-1106  
[craigdbanta@yahoo.com](mailto:craigdbanta@yahoo.com)

October 12, 2014

Ms. Iris Chi  
Los Angeles County Department of Regional Planning  
320 W. Temple St.  
Los Angeles, CA 90012

Re: Chiquita Canyon Landfill Draft Environmental Impact Report  
Request extension of time to review Draft Environmental Impact Report

Dear Ms. Iris Chi:

46-1

I am a resident of Val Verde and am writing to request an extension of time to review the Chiquita Canyon Landfill Draft Environmental Report. I am in close proximity to the landfill's proposed expansion, so I am very interested in reviewing the document and commenting.

I had visited the Chiquita Canyon Landfill's website: [www.chiquitacanyon.com](http://www.chiquitacanyon.com). While on the landfill's site, I looked under the "Looking Forward" tab and clicked on the "Master Plan Revision". This took me to the following page on the Chiquita Canyon Landfill's website: <http://www.chiquitacanyon.com/looking-ahead/master-plan-revisions/>. I followed the directions on the landfill's page and read, "An electronic version of the DEIR is also available on the Department's website at: <http://planning.lacounty.gov/case> by typing the project number R2004-00559-(5) in the Search Case Archive Window." I thought, how convenient and went to the link and entered the project number in the Search Case Archive Window, as instructed. I tried to locate the document, but it wasn't there (and to date is still not there). I then came to the conclusion that the document was not ready yet.

I recently spoke to one of my neighbors and was informed that the Draft Environmental Impact Report comment period will be up soon. I had originally planned to view the document at the Castaic Public Library, but after visiting the Chiquita Canyon Landfill's website, I thought the trip would be fruitless. The document is very long and I don't feel I have adequate time to review it properly now. This is unfair, considering the information on the Chiquita Canyon Landfill's website was erroneous. Due to this erroneous information, I was led to believe that I had much more time (believing the document wasn't ready yet). As I am sure I am not the only person who followed the landfill's website's directions in trying to locate the report, I am asking that you do the only fair thing and grant an extension. Whether intentionally or unintentionally, the information on the landfill's website was incorrect. Also, the information on the landfill's website should be updated to give the correct procedure. Thank you for your time.

Sincerely,  
Craig Banta

## Letter No. 46

Craig Banta  
29027 Elk Avenue  
Val Verde, CA 91384

### Response to Comment No. 46-1

The Los Angeles County Department of Regional Planning approved two extensions to the public comment period for the Original Draft EIR. The public comment period ended on October 23, 2014, after a 105-day review period.

Iris Chi

From: Denice Bishop [dnc.bishop@yahoo.com]
Sent: Monday, October 13, 2014 2:33 PM
To: Iris Chi
Cc: dnc.bishop@yahoo.com
Subject: Chiquita Landfill Expansion - DEIR Questions

Follow Up Flag: Follow up
Flag Status: Completed

October 13, 2014

To: Iris Chi - Department of Regional Planning County of Los Angeles/Department of Regional Planning Zoning Permits ichi@planning.lacounty.gov

From: Steven and Denice Bishop
30169 Kessler Ct. Castaic CA 91384
dnc.bishop@yahoo.com

To whom it may concern,

We are writing this letter to voice our concerns about the Chiquita Landfill Expansion in behalf of the surrounding bedroom communities in and around the Santa Clarita Valley.

1. Air quality emissions per DEIR will worsen in the surrounding areas. The DEIR was only based on the landfill itself and NOT on the hundreds of big rig trucks (off site vehicles) that will be coming and going every day through the quiet bedroom communities in Santa Clarita Valley. The deliveries to the new Hazardous Waste Facility from several areas were NOT included in the Air Quality Omissions Report. While most garbage trucks use propane, most big rig trucks use diesel. Has the Air Quality Commission for California been advised that the Air Quality Omissions in our area will exceed California standards and could violate the State Clean Air Act?

47-1

2. The 5 freeway in and out of Santa Clarita Valley is getting more crowded every year. The freeway from McBean to 126 is in poor condition. Who will be responsible for the road conditions on the 5 freeway? Who will be responsible for the overcrowding of vehicles on the 5 freeway, from preventing car accidents from the exceeding amount of trucks that will be coming through the Santa Clarita Valley and for the repairing of the 5 freeway from heavy truck traffic?

47-2

3. The Chiquita Landfill is presumed to have checkpoints to check the incoming trucks from bringing in Hazardous Waste. The Chiquita Landfill representatives told us at a town council meeting they took in Hazardous Sludge Waste from Santa Barbara. If there were consistent check points for Hazardous Waste, how did this Hazardous Waste from Santa Barbara slip through? Where are those checkpoints? It has been observed that not every truck or big rig entering the Landfill at the entrance are checked. What GUARANTEE does the surrounding communities have that Chiquita will check all incoming trucks for Hazardous Waste?

47-3

4. The County and the Castaic Town Council were asked why the Hasley Hills community has not been more informed about the Landfill Expansion and why the Landfill was not disclosed to some new home buyers in the Hasley Hills area in the last few years. The County and Castaic Town Council said per California State law they don't have to inform unless you are within a

47-4

1000 ft. of the Landfill. The Town Council and the surrounding area Realtors were asked, if the landfill becomes fully functional and if the Castaic Town Council excepts mitigation fees from Chiquita, will those selling a home in the Hasley Hills area need to disclose this new information? The Town Council and area realtors believe it is likely. If this is true, will it lower the home values of the newer bedroom community of Hasley Hills, with homes ranging from \$500,000-\$700,000, which were built five years after the last expansion? If the values were to be affected in the Hasley Hills area, why not keep the Hasley Hills residences more informed about the large expansion, regardless of the 1000ft. law?

47-4  
cont'd

5. The water quality in the Santa Clarita Valley and the surrounding areas is already questionable, but we also have a major drought in all areas around Santa Clarita. The Santa Clara River sits right next to the landfill. What GUARANTEE do we all have from the County and Newhall Farm and Land that this river and our surrounding wells will never be contaminated from this Landfill expansion?

47-5

6. The DEIR stated the No Project Alternative was not considered due to greenhouse gas omission impacts and the transportation impacts. Were the impacts of the greenhouse gas omissions and the transportation problems FULLY considered for the Santa Clarita area and the Castaic area?

47-6

It is our hope that the Chiquita representatives and the County will have concrete answers to these important environmental questions that will impact the lives of many in these bedroom communities surrounding the Chiquita Landfill.

Sincerely,  
Steven and Denice Bishop

Sent from my iPad

# Letter No. 47

Denice Bishop  
30169 Kessler Ct.  
Castaic, CA 91384

## Response to Comment No. 47-1

The South Coast Air Quality Management District is the Reviewing Agency for air quality concerns. Their comments are included in the Final EIR as Comment Letters 40 and 296. In addition, Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, was revised to reflect responses to their comments received on the Original Draft EIR.

## Response to Comment No. 47-2

The California Department of Transportation (Caltrans) is the Reviewing Agency for traffic concerns on Interstate 5 (I-5). Their comments are included in the Final EIR as Comment Letter Nos. 24 and 390, and detailed responses to their comments have been provided in Topical Response #25, Traffic. Topical Response #25 also includes a discussion of issues raised by other commenters related to traffic.

## Response to Comment No. 47-3

The referenced comment does not establish that any hazardous materials have been accepted at CCL. Hazardous waste is not accepted for disposal at CCL. Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance, Topical Response #29a for a discussion of Wastes to be Disposed, and Topical Response #29b for a discussion of the Waste Screening and Acceptance Program.

## Response to Comment No. 47-4

Please see Topical Response #20 for a discussion of Property Values.

Also see Topical Response #22 for a discussion of Public Scoping and Public Outreach, including outreach and notifications.

## Response to Comment No. 47-5

Please see Topical Response #30 for a discussion of Water Quality.

## Response to Comment No. 47-6

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, and revised Chapter 18, Project Alternatives, of the Partially Recirculated Draft EIR.



**RECEIVED**  
OCT 16 2014  
BY: \_\_\_\_\_

#48

October 13, 2014

Greg and Tanya Hauser  
30641 Arlington Street  
Val Verde, CA 91384

Los Angeles County Dept of Regional Planning  
Attn: Iris Chi  
Zoning Permits Section Rm 1345  
320 W. Temple St.  
Los Angeles CA 90012

Re: Chiquita Canyon Landfill Expansion Draft Environmental Impact Report  
Project No. R2004-00559-(5) SCH No. 2005081071

Dear Ms. Chi and to All Whom It May Concern:

As new Val Verde residents, we are deeply concerned about the potential expansion of the Chiquita Canyon Landfill. In this letter, we approach this issue from two points of view: 1) a business practice perspective, and 2) a personal perspective.

Terri Crain, the CEO of the SCV Chamber of Commerce, supports the dump expansion. She made comments such as, "Chiquita Canyon is a good community supporter and they have great community stewardship," and "They're just being proactive and planning for the future as good business practice."<sup>1</sup> These statements are not valid based upon their past performance. Here are some prime examples:

48-1

- They have failed on compliance issues related to odors, elevated gases, and acceptable trash & litter remediation.<sup>2</sup>

- They have shown willful violation of the 1997 Los Angeles County permit by accepting sewer sludge and chemicals. The landfill signed a contract with the community of Val Verde in 1997. In this contract, the landfill is banned from accepting sludge. They only stopped accepting sludge because they were caught and the existing sludge was never properly dealt with. There is a worry in the community that this sludge contains arsenic.<sup>3</sup>

48-2

- The landfill accepted radioactive waste from Rocketdyne, on at least one occasion, yet the landfill rep says they never did.<sup>4</sup>

48-33

- They are violating their contract which states the closure shall occur when the 23,000,000-ton capacity is reached, or November 24, 2019, whichever occurs first. Some residents in the area have purchased homes in recent years because they believed the landfill would close as promised.

48-4

- Its borders will be 500 feet from the nearest commercial center, including the U.S. Post Office; 5,000 feet from the nearest school; and less than a mile from an elementary school, churches, and restaurants. Furthermore, their business is only 1,200 feet from the nearest home and less than a mile from thousands of

48-5

residential homes. This problem will only be exacerbated when the Newhall Ranch project starts construction.

48-5  
cont'd

The dump representatives have a poor track record of community stewardship and good business practice. A company demonstrating such a lack of integrity cannot be trusted and should not be given an opportunity to continue this pattern of ambivalence and deceit.

48-6

This expansion also raises personal concerns:

- The Draft Environmental Impact Report states that cancer will continue to rise well above normal levels.
- We have two small children and we think often of the health problems that we, but especially our children, may experience as a result.
- We are concerned for our neighbors and the health problems that some who live very close to the landfill are already experiencing, as well as future health issues that are likely to occur with an expansion.
- Greg also works at the business park adjacent to the landfill. We are concerned for the health of all those who work in that area if this expansion is approved. From our understanding many of those businesses are unaware of the potential expansion.

48-7

- The home values of all who live in Val Verde and the immediate Castaic area will likely decline. Business values will decline as well.

48-8

We also have concerns about the \$3,500 payment you received from the landfill. What is the expectation associated with this donation?

48-9

We oppose this expansion, and request all those involved in the decision-making process to highly value the health and wellbeing of the Castaic/Val Verde/Santa Clarita community. Please consider the impact this landfill expansion (which is equivalent to a 12-story building of garbage) would have on the greater Santa Clarita area.

Thank you.

Sincerely,

Greg and Tanya Hauser

<sup>1</sup> <http://www.hometownstation.com/santa-clarita-news/business-2/santa-clarita-valley-chamber-of-commerce-shares-legislative-positions-43894>

<sup>2</sup> <http://chiquitalandfill.net/history-of-non-compliance/>

<sup>3</sup> <http://scvnews.com/2014/09/29/strange-tactics-commentary-by-darryl-manzer/>

<sup>4</sup> Ibid, but please read the comments on this story.

# Letter No. 48

Greg and Tanya Hauser  
30641 Arlington Street  
Val Verde, CA 91384

## Response to Comment No. 48-1

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance.

## Response to Comment No. 48-2

CCL does not accept sewer sludge and chemicals. Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance. Also see Topical Response #29a for a discussion of Wastes to be Disposed.

The referenced comment does not establish any violation of arsenic standards, and the landfill is in compliance with applicable standards for arsenic and other materials.

See Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

## Response to Comment No. 48-3

CCL does not accept radioactive waste. Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance, Topical Response #29a for a discussion of Wastes to be Disposed, and Topical Response #29b for a discussion of the Waste Screening and Acceptance Program.

## Response to Comment No. 48-4

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

## Response to Comment No. 48-5

The property boundary of CCL is not changing as a result of the Proposed Project.

## Response to Comment No. 48-6

This comment does not raise an environmental issue.

## Response to Comment No. 48-7

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, which includes a revised Health Risk Assessment for the Proposed Project. See also Topical Response #21, Public Health.

## Response to Comment No. 48-8

Please see Topical Response #20 for a discussion of Property Values.

## Response to Comment No. 48-9

This comment does not raise an environmental issue.



Date: October 13, 2014

Attn: Iris Chi  
Zoning Permits Section Rm 1345  
Los Angeles County Dept. of Regional Planning  
320 W. Temple St.  
Los Angeles CA 90012

Re: Chiquita Canyon Landfill Expansion Draft Environmental Impact Report  
Project No. R2004-00559-(5) SCH No. 2005081071

**Response TO Draft Environmental Impact Report**

Dear Ms Chi:

The Citizens for Chiquita Canyon Landfill Compliance (C4CCLC) appreciates this opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the proposed Chiquita Canyon Landfill (CCL) Expansion Project. The Citizens for Chiquita Canyon Landfill Compliance is not an official organization. It is a group of concerned residents, homeowners, and business owners. The Citizens for Chiquita Canyon Landfill Compliance's mission is to work for improvement of the quality of life in directly affected communities.

In reaction to the Draft Environmental Impact Report [DEIR] which proposes an expansion and extension of the Chiquita Canyon Landfill, we are submitting comments to the DEIR, stating our opposition to the expansion as local property owners/residents.

Please direct any questions regarding these comments, as well as appropriate responses, to us at [chiquitalandfill@gmail.com](mailto:chiquitalandfill@gmail.com).

Sincerely,

Steve Lee

cc Steven Lee  
Abigail DeSesa  
Susan Evans

<http://dpw.lacounty.gov/epd/tf/chiquitadeir.html>  
<http://www.scribd.com/doc/238115408/TERA-Response-to-the-Scholl-Canyon-DEIR>

Chapter 10	Table 10-6	<p>Please see Table 10-6</p> <p><b>Please clarify the 720 trucks of contaminated soil listed in Table 10-6. Three hundred (300) large trucks and 60 ten (10) wheelers will be 720 trucks. The landfill does not take 300 large trucks or 60 ten wheelers at this time. They take in 3,000 tons a day not 6,000, to the reality of todays landfill traffic is deceptive when you claim it is 6,000 tons. Actually is current daily activity is 3,000 tons. Please list the individual contaminants. Please include at what levels each contaminant will be at. Please list the dangers for each contaminant to human population, and to the animal population. Please list all side effects to both human and animals. Please include all the sites the soil will be coming from, and at what level the contaminants will be from each site. Please clarify the reasons the contaminants are leaving their original locations, making sure to include any lawsuits that are requiring the contaminants to be removed and relocated. Please list and provide all procedures that will control the dust and small particles from escaping into the air; as dust and particles will be stirred up with each load of dirt. Please list the level of small particles expected to escape into the air from the 720 truckloads per day. Please factor in the average wind speed in addition to the traveling speed the truck is expected to be moving at. Please re-calculate figures in the air quality section and in the water quality section to include the 720 trucks of contaminated soil. Please make sure to include all this data in a press release to the entire greater Santa Clarita Valley and all surrounding areas within a 20 mile radius.</b></p>	49-1
11.1	Air Quality	<p><b>Citizens are concerned with the project's impact on air quality. These concerns include: • Odors • Dust from earth movement • Dust from trucks • PM2.s from trucks and related health risks on nearby Val Verde and Live Oaks residents Specific comments noted below.</b></p>	
		<p>Environmental Setting.</p> <p><b>Please clarify and contextualize Val Verde and Live Oaks pollution levels in comparison to the rest of California, using Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen index. Such context should include indexes for air quality, Particulate Matter, Diesel, Solid Waste, Ozone, Toxic Releases, and Hazardous Waste.</b></p> <p><b>OEHHA's CalEnviroScreen should be released for Val Verde and Live Oaks shows and should include the extra environmental pollution due to the I-5 corridor and its heavy traffic and exhaust from that traffic.</b></p>	49-2
Figure 11-1	Air Quality	<p><b>The map on figure 11-1 suggest that there is major developed intensity that sits on the boarder of the landfill. Due to the fact that two schools sit in this same neighborhood testing for air quality, gases and particles currently escaping the landfill needs to be done, to the northeast. More research needs to be done on the health effects that are now being exhibited and then compared to the increase expected with expansion of the landfill. Not to do this would be irresponsible to the children that attend these two schools.</b></p>	49-3
11.3.3.2.	Climate and Meteorology	<p>Ambient air quality data were taken from data published by CARB (on the Aerometric Data Analysis and Management [ADAM] website) and EPA (on the AirData website). Ambient concentrations of ozone, NO<sub>2</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are recorded at monitoring stations located throughout the South Coast Air Basin, in which CCL is located. Three of the nearest monitoring stations</p>	49-4

		<p>were used to gather information regarding the air quality around Chiquita Canyon: Burbank – W Palm Avenue, Reseda, and Santa Clarita stations. The Santa Clarita station is the closest to the project site, approximately 7 miles from the landfill entrance. SO<sub>2</sub> and PM<sub>2.5</sub> monitoring data are not available at the Santa Clarita station, therefore, the Burbank and Reseda stations were used for SO<sub>2</sub> and PM<sub>2.5</sub> data, respectively. A summary of the maximum monitored criteria pollutant concentrations is presented in Table 11-2.</p> <p><b>This is a gross misrepresentation of the air quality of the surrounding neighborhoods of Val Verde, Live Oak, and Castaic. The winds blow North West in the early mornings, and North East in the evenings on most days. Not one monitor that is used would accurately measure the air quality of the townships nearest the landfill, nor would it measure the gases escaping the landfill. New data needs to be released from monitors that actually are in the airshed of the landfill. The monitors need to be moved for accurate testing. We cannot proceed without accurate testing in the areas of LiveOak, Hasley Hills, and Val Verde. Additional town nearby that should have the testing done would be Piru, Fillmore, and Santa Paula that are directly in the airshed of the landfill, located in Ventura County.</b></p>	49-4 cont'd
11.2	Methodology	<p>The DEIR states: The construction equipment would be equipped with engines meeting California Air Resources Board (CARB) requirements for a large fleet at the time of construction (CARB, 2013a). This would include a combination of Tier 3 and Tier 4 compliant equipment.</p> <p><b>This is greatly flawed as it does not list the equipment and how each piece of equipment is used. Please list each piece of equipment and how it meets the requirements listed (CARB213a).</b></p>	49-5
11.2	Methodology	<p>The draft EIR states: The construction equipment would be equipped with diesel particulate filters (DPF) and lean nitrogen oxides (NO<sub>x</sub>) catalyst, which would result in an 85 percent reduction for particulate matter and a 40 percent reduction for No<sub>x</sub> (United States Environmental Protection Agency [EPA], 2013f)</p> <p><b>Val Verde and nearby neighborhoods are concerned this is flawed because we need to know the current levels. Construction onsite and along with the combination with the I5 FWY / 126 HWY corridor truck traffic, and the major truck stop in Castaic Junction operation emissions would exceed the screening thresholds for No<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. pursuant to the South Coast Air Quality Management District's (SCAQMD's) Localized Significance Thresholds (LST) Methodology. The exceedance of these screening thresholds indicates the need to conduct a health risk assessment in accordance with SCAQMD's LST methodology. Simply declaring the impacts significant and unavoidable without analyzing and disclosing the potential health risks of this exceedance is not appropriate. Please analyze and identify potential health along with corresponding mitigation measures. Please add these mitigations to the Mitigation Monitoring and Reporting Program. Please also include new court requirements from Sierra Club v. County of Fresno, Jun 30, 2014, where the court refined its previous test for air quality impacts analysis under CEQA, and now requires recirculation of an EIR due to its failure to specifically analyze the impacts on human health resulting from the change in air quality due to the project's air emissions.</b></p>	49-6

11.2 Methodology	Operation Emission Reductions BMPs	<p>DEIR states: Unnecessary truck and equipment idling would be limited to less than 2 minutes, to the extent feasible.</p> <p><b>Please define a time limit that is more accurate than feasible. Feasible can represent extended period of unacceptable periods of time due to the dangers of truck exhaust. Please clarify. The residents are concerned with the emission of criteria pollutants of idling on-road vehicles queued at the entrance gates to the landfill and recommends the following mitigation measure to reduce impacts. Institute operation efficiency at the front gate/scales. There are currently multiple lanes that operate on a first come, first served basis. Dedicate one lane to vehicles (i.e. commercial vehicles) with accounts already setup with the landfill to expedite their entry into the landfill and reduce their idling time. All other vehicles that require extra time for check-in (e.g. self-haulers) would use a separate lane. This will greatly reduce the backup of vehicles waiting to check in.</b></p> <p><b>Pease add this mitigation to the Mitigation Monitoring and Reporting Program.</b></p>	49-7
11.2 Methodology	Operation Emission Reductions BMPs	<p>DEIR states: Use of all construction equipment would be suspended during second stage smog alerts (SCAQMD, 1993)</p> <p><b>Please clarify who determines the smog alerts in the Castaic area. Please additionally clarify if there is sufficient equipment testing smog levels in Castaic. Once a smog alert is issued, please state the procedure the landfill will take. The 1993 standards from SCAQMD is twenty-one years old. Please update if available.</b></p>	49-8
11.2	Methodology	<p>The DEIR states: Fugitive dust from vehicle travel on paved roads would be controlled using a 25 - foot- long gravel Trackout apron, which would result in a 46 percent reduction in particulate matter emissions (South Coast Air Quality Management District [SCAQMD], 2013a and 2013b). Paved roads would be cleaned three times daily using a SCAQMD-approved street sweeper, which would result in an additional 45 percent emissions reduction for particulate matter (Western Regional Air Partnership [WRAP], 2006a)</p> <p><b>Please clarify 46% of the reduction. Is that reduction in what the landfill allows to escape now, or is that a 46% reduction of what is allowed by the SCAQMD. Please clarify the street sweeper three times a day. Is this sweeper kicking the particulate matter to the side of the road or is it actually collecting the particulate matter for disposal. Please have the landfill stop using the old Western Regional Air Partnership [WRAP], 2006a and update to the Western Regional Air Partnership WRAP 2014-18 Integrated Work Plan.</b></p>	49-9
11.2	Methodology	<p>DEIR states: Fugitive dust from vehicle travel on unpaved roads would be controlled through watering two times daily, the use of dust palliatives, paving as much as possible, and limiting the maximum vehicle speed to 15 miles per hour, which would result in a combined effective control efficiency of 90 percent (SCAQMD, 2013c; WRAP, 2006b).</p> <p><b>Please clarify how the speed limit of 15 miles per hour is going to be enforced. Additionally, please clarify what the 90 percent is going to be removing from the trucks. Once again please use WRAP 2014-18</b></p>	49-10

		<b>Integrated Work Plan.</b>	49-10 cont'd
11.2	Methodology	<p>DEIR states: Fugitive dust from soil disturbance would be suppressed with hourly watering and dust suppressant application, which would reduce particulate matter emissions by 90 percent (WRAP, 2006c).</p> <p><b>Please clarify what will occur during a drought year. Again, please update to WRAP 2014-18 Integrated Work Plan.</b></p>	49-11
11.3.3.1	Attainment Status	<p>DEIR states: SCAQMD operates a network of ambient air quality monitoring stations located throughout the Basin to characterize the air quality environment. Pollutants monitored include ozone, CO, nitrogen dioxide (NO<sub>2</sub>), particulate matter with aerodynamic diameter less than or equal to 10 microns (PM<sub>10</sub>), particulate matter with aerodynamic diameter less than or equal to 2.5 microns (PM 2.5), sulfur dioxide (SO<sub>2</sub>), and lead. Depending on whether or not the air quality standards are met or exceeded, an area is classified as being in “attainment” or “nonattainment” for each pollutant. The Basin currently exceeds state And federal ambient air quality standards for several pollutants and is required to implement strategies that would reduce the pollutant levels to achieve the recognized standards. The area where the project is located is designated as nonattainment for the state ozone, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>2</sub>, and lead standards. The area is designated as nonattainment for the federal 8-hour ozone, PM 2.5, and lead standards. Table 11-1 shows the current attainment status for regulated air pollutants in the air basin.</p> <p><b>Please test for the following chemicles.</b></p> <p>1. Diethyl sulphide:</p> <p>Potential Symptoms: Irritation of eyes and skin; cough, sore throat; nausea; weakness. Health Effects: Irritation-Eyes---Marked (HE14); Irritation-Skin---Mild (HE16) Affected Organs: Eyes, skin, respiratory system</p> <p><a href="https://www.osha.gov/dts/chemicalsampling/data/CH_236505.html">https://www.osha.gov/dts/chemicalsampling/data/CH_236505.html</a></p> <p>1. The above gas/chemical must be tested on monthly bases. 2. The results must be publicly documented. 3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak. 4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</p> <p>2. Trichloroethylene Some occupational studies have shown that TCE produces</p> <ul style="list-style-type: none"> <li>• CNS effects</li> <li>• decreased appetite</li> <li>• gastrointestinal irritation</li> <li>• headaches</li> <li>• mucous membrane</li> <li>• skin irritation</li> </ul> <p>Hepatotoxicity has been associated primarily with TCE inhalation and ingestion of very large amounts. Renal failure has been reported in concert with confirmed hepatic damage.</p>	49-12

	<p>Cardiac dysrhythmias may be induced by heavy TCE exposure.  <a href="http://www.atsdr.cdc.gov/csem/csem.asp?csem=15&amp;po=10">http://www.atsdr.cdc.gov/csem/csem.asp?csem=15&amp;po=10</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made know to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>3. 1,2-dichloropropane  Following several cases of bile duct cancer among Japanese printing firm employees, an investigation by the Japanese Ministry of Health, Labour and Welfare concluded in March 2013 that these cases were likely due to the use of cleaning agents containing 1,2-dichloropropane. Thus, there is reasonable evidence that 1,2-dichloropropane may be a carcinogen.[4][5]  Data from animal studies show tumor growth in the liver and mammary glands.[6] Further animal studies involving inhalation toxicity data has caused the National Institute for Occupational Safety and Health to classify 1,2-dichloropropane as a carcinogen and IDLH.[7]  <a href="http://en.wikipedia.org/wiki/1,2-Dichloropropane">http://en.wikipedia.org/wiki/1,2-Dichloropropane</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>4. Dibromomethane  Human Toxicity Excerpts:  ... Exerts ... /CNS depression/ and irritant effects; it causes liver and kidney disorders and produces blood changes incl neutrophil leukocytosis with relative lymphocytosis and vitamin C deficiency. Its toxic effects are in many respects similar to those of bromoform; however, bromoform is more toxic than dibromomethane.  [International Labour Office. Encyclopedia of Occupational Health and Safety. Vols. I&amp;II. Geneva, Switzerland: International Labour Office, 1983., p. 328]  **PEER REVIEWED**</p> <p><a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+1334">http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+1334</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>5. Propyl acetate  Human Toxicity Excerpts:  /SIGNS AND SYMPTOMS/ IN MAN, CONCEN OF 200 PPM CAUSE</p>
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49-12  
cont'd

	<p>IRRITATION OF EYES AND GREATER CONCEN ... /CAUSE/ IRRITATION OF NOSE AND LARYNX. AMONG WORKERS OCCUPATIONALLY EXPOSED ... /THERE ARE REPORTS OF FEELING OF CONSTRICTION OF CHEST AND COUGHING ... REPEATED CONTACT OF LIQUID WITH SKIN MAY LEAD TO DEFATTING AND CRACKING.  [International Labour Office. Encyclopedia of Occupational Health and Safety. Vols. I&amp;II. Geneva, Switzerland: International Labour Office, 1983., p. 782] **PEER REVIEWED**</p> <p>/SIGNS AND SYMPTOMS/ HUMAN ... EXPOSED FOR WK TO VAPOR CONCEN OF 29 TO 60 MG/L OF AIR ... HAVE SHOWN CONJUNCTIVAL IRRITATION ...  [Grant, W. M. Toxicology of the Eye. 2nd ed. Springfield, Illinois: Charles C. Thomas, 1974., p. 861] **PEER REVIEWED**</p> <p>/SIGNS AND SYMPTOMS/ Overexposure to n-propyl acetate may cause irritation of the eyes, nose, and throat. Severe overexposure may cause weakness, drowsiness, and unconsciousness.  [Mackison, F. W., R. S. Stricoff, and L. J. Partridge, Jr. (eds.). NIOSH/OSHA - Occupational Health Guidelines for Chemical Hazards. DHHS(NIOSH) Publication No. 81-123 (3 VOLS). Washington, DC: U.S. Government Printing Office, Jan. 1981., p. 1] **PEER REVIEWED**</p> <p>Skin, Eye and Respiratory Irritations:  IN MAN, CONCEN OF 200 PPM CAUSE IRRITATION OF EYES &amp; GREATER CONCEN ... /CAUSE/ IRRITATION OF NOSE &amp; LARYNX.  [International Labour Office. Encyclopedia of Occupational Health and Safety. Vols. I&amp;II. Geneva, Switzerland: International Labour Office, 1983., p. 782] **PEER REVIEWED**</p> <p><a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+161">http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+161</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>6. Bromo dichloromethane</li> </ol> <p>Animal studies indicate that the liver, kidney, and central nervous system are affected by exposure to bromodichloromethane. The effects of high doses on the central nervous system include sleepiness and incoordination. Longer exposure to lower doses causes damage to the liver and kidneys. There is some evidence from animal studies that bromodichloromethane may cause birth defects at doses high enough to make the mother sick. It is not known if lower doses would cause birth defects.</p> <p><a href="http://www.atsdr.cdc.gov/toxfaqs/tf.asp?id=707&amp;tid=127">http://www.atsdr.cdc.gov/toxfaqs/tf.asp?id=707&amp;tid=127</a></p>
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	<p>1. The above gas/chemical must be tested on monthly bases.</p> <p>2. The results must be publicly documented.</p> <p>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</p> <p>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</p> <p>7-butanethiol</p> <p>Butanethiol is a very noxious and caustic chemical compound, and at sufficiently high concentrations, it produces serious health effects in both humans and animals, especially as a result of prolonged exposure. Higher concentrations can lead to unconsciousness and coma after prolonged exposure. Contact with the skin and mucous membranes causes burns, and contact with the eyes can lead to blurred vision or complete blindness.[citation needed] Inhalation may cause weakness, confusion, cough, dizziness, drowsiness, headache, nausea, vomiting, and shortness of breath. The substance irritates the eyes, the skin, and the respiratory tract. It may cause effects on the thyroid and the nervous system and could cause lowering of consciousness.[4]</p> <p><a href="http://en.wikipedia.org/wiki/Butanethiol">http://en.wikipedia.org/wiki/Butanethiol</a></p> <p>1. The above gas/chemical must be tested on monthly bases.</p> <p>2. The results must be publicly documented.</p> <p>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</p> <p>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</p> <p>8-Methyl butyrate</p> <p>No known side effects at this time.</p> <p>9-Cis-1,3 dichloropropane</p> <p>No noticeable adverse side effects at this time.</p> <p>10. Dimethyldisulphide</p> <p>The most commonly reported side effects include headaches and burning and itching on contact with the skin. Strong allergic reactions have been reported.[full citation needed] DMSO can cause contaminants, toxins, and medicines to be absorbed through the skin, which may cause unexpected effects. DMSO is thought to increase the effects of blood thinners, steroids, heart medicines, sedatives, and other drugs. In some cases this could be harmful or dangerous.[25] It is a developmental neurotoxin.[27]</p> <p><a href="http://en.wikipedia.org/wiki/Dimethyl_sulfoxide">http://en.wikipedia.org/wiki/Dimethyl_sulfoxide</a></p> <p>1. The above gas/chemical must be tested on monthly bases.</p> <p>2. The results must be publicly documented.</p> <p>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</p> <p>4. All violations must be made known to the public, especially Val Verde,</p>
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	<p>Hasley Hills, Stevenson Ranch, and Live Oak.</p> <p>11      sec-Butyl acetate</p> <p>Studies are lacking, but lean to little or no known side effects.</p> <p>12.      trans-1,3-dichloropropene Observations in humans The immediate effects of acute exposures to 1,3-D in humans were noted in a publication by Markovitz and Crosby (1984). Observations were made of 9 firemen involved in a clean-up of a tank truck spill of 1,3-D in 1973. The initial signs of toxicity included headache, neck pain, nausea, and breathing difficulty. Information on acute toxicity in humans can also be found in the DPR illness report database. Between 1982 and 1990, prior to the suspension of Telone II use, there were 55 cases of accidental exposures related to 1,3-D. Most were from workers receiving splash or spray due to accident and equipment failure or repair. The signs of toxicity included burning eyes and sinuses, skin irritation and rash, eye irritation and conjunctivitis, bitter taste in mouth, nausea, vomiting, stomach ache, headache, cough, chest pains, and loss of consciousness.</p> <p><a href="http://www.cdpr.ca.gov/docs/risk/rcd/dichloro.pdf">http://www.cdpr.ca.gov/docs/risk/rcd/dichloro.pdf</a></p> <p>Questions:</p> <ol style="list-style-type: none"> <li>1.      The above gas/chemical must be tested on monthly bases.</li> <li>2.      The results must be publicly documented.</li> <li>3.      The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4.      All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>13.      Amyl acetate</p> <p>Inhalation – Inhaling excessive amounts of primary amyl acetate may cause irritation to the nose, throat, and lungs. Anesthetic effects such as dizziness and drowsiness may also occur. Vapor concentrations are attainable that could be hazardous on single exposure. Ingestion – Primary amyl acetate has low toxicity if swallowed. Harmful effects are not anticipated from swallowing small amounts. Birth Defect Information – Primary amyl acetate has been toxic to the fetus in lab animals at doses toxic to the mother. It did not cause birth defects in laboratory animals.</p> <p><a href="http://msdssearch.dow.com/PublishedLiteratureDOWCOM/dh_031c/0901b8038031c3e3.pdf?filepath=productsafety/pdfs/noreg/233-00416.pdf&amp;fromPage=GetDoc">http://msdssearch.dow.com/PublishedLiteratureDOWCOM/dh_031c/0901b8038031c3e3.pdf?filepath=productsafety/pdfs/noreg/233-00416.pdf&amp;fromPage=GetDoc</a></p> <ol style="list-style-type: none"> <li>1.      The above gas/chemical must be tested on monthly bases.</li> <li>2.      The results must be publicly documented.</li> <li>3.      The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4.      All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol>
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	<p>14. Toluene</p> <p>Side Effect Profile: Toluene can cause brain, liver and kidney damage, hearing loss, memory impairment, and attention deficits. Death can result from heart failure, asphyxiation or aspiration. Toluene also owes its pharmacology to a mucosal irritant effect from an exothermic reaction with water. This results in vomiting, lacrimation and ocular burning, cough, chest pain, wheezing and possible interstitial edema, and kidney toxicity with tubular acidosis. Toluene exposure is also associated with a transient liver injury.</p> <p><a href="http://www.nhtsa.gov/people/injury/research/job185drugs/toluene.htm">http://www.nhtsa.gov/people/injury/research/job185drugs/toluene.htm</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <ul style="list-style-type: none"> <li>• 1,2-trichloroethane</li> <li>• No information is available on the acute effects of 1,1,2-trichloroethane in humans from inhalation or oral exposures. Studies on dermal exposure to 1,1,2-trichloroethane in humans have reported stinging and burning sensations and transient whitening of the skin. (1)</li> <li>• Animal studies have reported effects on the liver, kidney, and CNS from acute inhalation and oral exposure to 1,1,2-trichloroethane. (1)</li> <li>• Tests involving acute exposure of mice and rats have shown 1,1,2-trichloroethane to have moderate and high acute toxicity from inhalation and oral exposures, respectively. (1,2)</li> </ul> <p><a href="http://www.epa.gov/ttn/atw/hlthef/tri-etha.html">http://www.epa.gov/ttn/atw/hlthef/tri-etha.html</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>16. Ethyl butyrate</p> <p>No visible side effects besides a little irritation.</p> <p>17. Octane</p> <p>Many alerts and warnings have been issued by the FDA about Octane side effects. Some of the side effects are mild like dry eyes and dry lips; however, there are a number of severe symptoms that persist long after treatment stops. Medical studies link the use of Octane to Inflammatory Bowel disease including Crohn's Disease and Ulcerative Colitis. Inflammation in the colon causes frequent emptying and diarrhea. Other Octane side effects include stomach pain,</p>
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	<p>cramping, gastrointestinal bleeding, hepatitis, impaired night vision, hypertension, hair loss, and depression even after treatment ends. Even Roche has openly presented that Octane can alter mood and that this synthetic derivative of vitamin A can negatively impact brain function. The FDA website warns that all patients should be observed closely for symptoms of depression or suicidal thoughts. Between 1989 and 2003, 72 suicides were linked to Octane. Octane is one of three drugs most reported for adverse side effects on the FDA database.</p> <p><a href="http://www.callrid.com/guide/health/consumerinjurylawyersaccutane-and-inflammatory-bowel-disease.html">http://www.callrid.com/guide/health/consumerinjurylawyersaccutane-and-inflammatory-bowel-disease.html</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>18. Butyl acetate</p> <p>/HUMAN EXPOSURE STUDIES/ When volunteers were exposed to n-butyl acetate, most of them reported that 3 to 5 min of exposure to 970 mg/cu m was irritating to the throat and that 1450 mg/cu m was irritating to the nose and eyes as well. In a later study, volunteers were exposed to 70, 350, 1050 or 1400 mg/cu m for 20 min or to 70 or 700 mg/cu m for 4 hr. The highest concentrations caused minimal irritation of eyes and respiratory passages. A worker in penicillin production developed eczema on the hands, arms and face, and had a positive reaction to a patch test with n-butyl acetate (5% in olive oil). This study also included a control group of 36 patients, all of whom tested negative. In sensitization studies with human subjects, n-butyl acetate (4 or 10% in petroleum jelly) was reported to cause no irritation or sensitization. ... [Criteria Group for Occupational Standards National Institute for Working Life; Scientific Basis for Swedish Occupational Standards XIX, Consensus report for Butyl Acetates, p.23 (1998). Available from, as of October 27, 2011: <a href="http://www.inchem.org/documents/kemi/kemi/ah1998_25.pdf">http://www.inchem.org/documents/kemi/kemi/ah1998_25.pdf</a> **PEER REVIEWED**</p> <p>/HUMAN EXPOSURE STUDIES/ ... THROAT IRRITATION IN HUMAN SUBJECTS AT 200 PPM ... BECAME QUITE SEVERE AT 300 PPM. [American Conference of Governmental Industrial Hygienists, Inc. Documentation of the Threshold Limit Values and Biological Exposure Indices. 6th ed. Volumes I, II, III. Cincinnati, OH: ACGIH, 1991., p. 164] **PEER REVIEWED**</p> <p><a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+152">http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+152</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol>
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	<p>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</p> <p>19. Dibromo chloromethane</p> <p>No studies are available regarding health effects in people exposed to bromodichloromethane. Animal studies indicate that the liver, kidney, and central nervous system are affected by exposure to bromodichloromethane. The effects of high doses on the central nervous system include sleepiness and incoordination. Longer exposure to lower doses causes damage to the liver and kidneys. There is some evidence from animal studies that bromodichloromethane may cause birth defects at doses high enough to make the mother sick. It is not known if lower doses would cause birth defects.  <a href="http://www.atsdr.cdc.gov/toxfaqs/tf.asp?id=707&amp;tid=127">http://www.atsdr.cdc.gov/toxfaqs/tf.asp?id=707&amp;tid=127</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>20. Tetrachloroethylene</p> <ul style="list-style-type: none"> <li>• The major effects from chronic (it exceeds the acceptable rate) inhalation exposure to tetrachloroethylene in humans are neurological effects, including sensory symptoms such as headaches, impairments in cognitive and motor neurobehavioral functioning and color vision decrements. Other effects noted in humans, generally at higher exposures, include liver damage, kidney effects, immune and hematologic effects, and on development and reproduction. (1, 2)</li> <li>• Animal studies have reported effects on the liver, kidney, and CNS from chronic (it exceeds the acceptable rate) inhalation exposure to tetrachloroethylene.</li> </ul> <p><a href="http://www.epa.gov/ttn/atw/hlthef/tet-ethy.html">http://www.epa.gov/ttn/atw/hlthef/tet-ethy.html</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>21. 1-pentanethiol</p> <ul style="list-style-type: none"> <li>• Eye irritation</li> <li>• Eye redness</li> <li>• Eye pain</li> <li>• Skin irritation</li> <li>• Skin redness</li> <li>• Skin pain</li> <li>• Nose irritation</li> </ul>
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	<ul style="list-style-type: none"> <li>• Throat irritation</li> <li>• Burning throat sensation</li> <li>• Burning chest sensation</li> <li>• Cough</li> <li>• Respiratory system irritation</li> <li>• Headache</li> <li>• Nausea</li> <li>• Dizziness</li> <li>• Diarrhea</li> <li>• Vomiting</li> <li>• Dry skin</li> </ul> <p><a href="http://www.rightdiagnosis.com/c/chemical_poisoning_1_pentanethiol/symptom_s.htm">http://www.rightdiagnosis.com/c/chemical_poisoning_1_pentanethiol/symptom_s.htm</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>22. Chlorobenzene</p> <p>Acute Effects:</p> <ul style="list-style-type: none"> <li>• A child who ingested chlorobenzene became unconscious and cyanotic and had muscle spasms but recovered completely. (1)</li> <li>• Acute inhalation exposure of animals to chlorobenzene produced narcosis, restlessness, tremors, and muscle spasms. (1,2)</li> <li>• Acute animal tests in rats, mice, rabbits, and guinea pigs have demonstrated chlorobenzene to have low acute toxicity by inhalation and moderate acute toxicity from oral exposure. (1,3)</li> </ul> <p>Chronic Effects (Noncancer):</p> <ul style="list-style-type: none"> <li>• Chronic (it exceeds the acceptable rate) exposure of humans to chlorobenzene affects the CNS. Signs of neurotoxicity include numbness, cyanosis, hyperesthesia (increased sensation), and muscle spasms. (1,4)</li> <li>• Headaches and irritation of the mucosa of the upper respiratory tract and eyes have also been reported in humans chronically exposed via inhalation. (4)</li> <li>• The CNS, liver, and kidneys have been affected in animals chronically exposed to chlorobenzene by inhalation. (1)</li> <li>• Chronic (it exceeds the acceptable rate) ingestion of chlorobenzene has resulted in damage to the kidneys and liver in animals. (1,4)</li> <li>• EPA has calculated a provisional Reference Concentration (RfC) of 0.02 milligrams per cubic meter (mg/m<sup>3</sup>) for chlorobenzene based on kidney and liver effects in rats. The RfC is an estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups), that is likely to be without appreciable risk of deleterious noncancerous effects during a lifetime. It is not a direct estimator of risk but rather a reference point to gauge the potential effects. At exposures increasingly greater than the RfC, the potential for adverse health effects increases. Lifetime exposure above the RfC does not imply that an adverse health effect would necessarily occur. The provisional RfC is a value that has had some form of Agency review, but it does not appear on IRIS. (6)</li> <li>• The Reference Dose (RfD) for chlorobenzene is 0.02 milligrams per</li> </ul>
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	<p>kilogram body weight per day (mg/kg/d) based on histopathologic changes in the liver in dogs. (5)</p> <ul style="list-style-type: none"> <li>EPA has medium confidence in the study on which the RfD was based because it provided both a no-observed-adverse-effect level (NOAEL) and a lowest-observed-adverse-effect level (LOAEL) and incorporated several biochemical and biological endpoints; medium confidence in the database because several sub chronic, chronic (it exceeds the acceptable rate), developmental, and reproductive toxicity studies provide supportive data, but they did not give a complete assessment of toxicity; and, consequently, medium confidence in the RfD. (5)</li> </ul> <p><a href="http://www.epa.gov/ttn/atw/hlthef/chlorobe.html">http://www.epa.gov/ttn/atw/hlthef/chlorobe.html</a></p> <ol style="list-style-type: none"> <li>The above gas/chemical must be tested on monthly bases.</li> <li>The results must be publicly documented.</li> <li>The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>21. Ethylbenzene</p> <ul style="list-style-type: none"> <li>Respiratory effects, such as throat irritation and chest constriction, irritation of the eyes, and neurological effects such as dizziness, have been noted from acute inhalation exposure to ethylbenzene in humans. (1-3)</li> <li>Animal studies have reported central nervous system (CNS) toxicity; pulmonary effects; and effects on the liver, kidney, and eyes (irritation) from acute inhalation exposure to ethylbenzene.</li> </ul> <p><a href="http://www.epa.gov/ttn/atw/hlthef/ethylben.html">http://www.epa.gov/ttn/atw/hlthef/ethylben.html</a></p> <ol style="list-style-type: none"> <li>The above gas/chemical must be tested on monthly bases.</li> <li>The results must be publicly documented.</li> <li>The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>23 m/p-Xylene No side effects could be found at this time.</p> <p>24. Nonane Clinical Effects:</p> <p>0.2.1 SUMMARY OF EXPOSURE</p> <p>0.2.1.1 ACUTE EXPOSURE</p> <p>A) INGESTION - Pulmonary toxicity due to pentane aspiration is the primary concern following ingestion. Chemical pneumonitis, acute lung injury, and hemorrhage may occur. In extreme cases, respiratory arrest secondary to hypoxia following pneumonitis may occur. Aspiration of pentane may also result in transient CNS depression or excitement.</p> <p>B) INHALATION - Anorexia, CNS depression with euphoria, dizziness, headache, depression, confusion, inability</p>
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		<p>to concentrate, and loss of consciousness and coma in extreme cases may be seen. Polyneuropathies and seizures have been reported. Cardiovascular effects may include ventricular dysrhythmias and sudden death.</p> <p>C) DERMAL - Pentane is a skin irritant and may cause drying, erythema, hyperpigmentation, hyperemia, dermatitis, burning pain, and blisters.</p> <p>D) EYE - Pain, corneal irritation, and nystagmus may occur.</p> <p>0.2.3 VITAL SIGNS</p> <p>0.2.3.1 ACUTE EXPOSURE</p> <p>A) Impaired respiration may occur following inhalation exposure.</p> <p>B) Fever may occur secondary to aspiration pneumonitis.</p> <p>C) Hypotension may be seen.</p> <p>0.2.4 HEENT</p> <p>0.2.4.1 ACUTE EXPOSURE</p> <p>A) Pentane may cause pain, corneal irritation, and possibly nystagmus.</p> <p>B) Olfactory function does not appear to be affected by pentane.</p> <p>C) Taste dysfunction may occur.</p> <p>0.2.5 CARDIOVASCULAR</p> <p>0.2.5.1 ACUTE EXPOSURE</p> <p>A) Cardiac dysrhythmias, including ventricular fibrillation and sudden death, may result.</p> <p>0.2.6 RESPIRATORY</p> <p>0.2.6.1 ACUTE EXPOSURE</p> <p>A) Aspiration (coughing, choking, gagging), aspiration pneumonitis, asthma, hemoptysis, pulmonary edema, Lipoid pneumonia or respiratory arrest may occur.</p> <p>0.2.7 NEUROLOGIC</p> <p>0.2.7.1 ACUTE EXPOSURE</p> <p>A) Central nervous system depression, seizures, acute encephalopathy, and polyneuropathy have been seen with pentane toxicity.</p> <p>0.2.8 GASTROINTESTINAL</p> <p>0.2.8.1 ACUTE EXPOSURE</p> <p>A) Nausea, vomiting, gastritis, and diarrhea may occur.</p> <p>0.2.9 HEPATIC</p> <p>0.2.9.1 ACUTE EXPOSURE</p> <p>A) Liver injury may occur following ingestion or inhalation of pentane, but is uncommon. Elevated liver enzymes may occur.</p> <p>0.2.10 GENITOURINARY</p> <p>0.2.10.1 ACUTE EXPOSURE</p> <p>A) Renal effects appear to be infrequent, but may include acute renal failure, glomerulonephritis, interstitial nephritis, and Goodpasture's syndrome.</p> <p>0.2.11 ACID-BASE</p> <p>0.2.11.1 ACUTE EXPOSURE</p> <p>A) Metabolic acidosis may occur following aspiration</p>
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		<p>pneumonitis.</p> <p>0.2.13 HEMATOLOGIC</p> <p>0.2.13.1 ACUTE EXPOSURE</p> <p>A) Hemolysis and hemolytic anemia may occur with pentane toxicity.</p> <p>0.2.14 DERMATOLOGIC</p> <p>0.2.14.1 ACUTE EXPOSURE</p> <p>A) Pentane is a skin irritant and may cause drying, erythema, hyperpigmentation, hyperemia, dermatitis, burning pain, and blisters.</p> <p>0.2.15 MUSCULOSKELETAL</p> <p>0.2.15.1 ACUTE EXPOSURE</p> <p>A) Rhabdomyolysis has been reported.</p> <p>0.2.16 ENDOCRINE</p> <p>0.2.16.1 ACUTE EXPOSURE</p> <p>A) Adrenocorticotropin hormone levels have been increased in animal studies.</p> <p>0.2.17 METABOLISM</p> <p>0.2.17.1 ACUTE EXPOSURE</p> <p>A) Hypocholesterolemia and hypoalbuminemia have been reported.</p> <p>0.2.20 REPRODUCTIVE HAZARDS</p> <p>A) Parental exposure to hydrocarbons might be a risk factor for Prader-Willi syndrome in the offspring.</p> <p>B) Spontaneous abortion may occur in women exposed to pentane during pregnancy.</p> <p>0.2.21 CARCINOGENICITY</p> <p>0.2.21.1 IARC CATEGORY</p> <p>A) IARC Carcinogenicity Ratings for CAS109-66-0 (IARC Working Group on the Evaluation of Carcinogenic Risks to Humans, 2006; IARC Working Group on the Evaluation of Carcinogenic Risks to Humans, 2007; IARC Working Group on the Evaluation of Carcinogenic Risks to Humans, 2010; IARC Working Group on the Evaluation of Carcinogenic Risks to Humans, 2010a; IARC Working Group on the Evaluation of Carcinogenic Risks to Humans, 2008; IARC, 2004):</p> <p>1) Not Listed</p> <p>0.2.21.2 HUMAN OVERVIEW</p> <p>A) Renal neoplasia and dermal carcinogenesis may be seen following hydrocarbon exposure.</p> <p>0.2.22 GENOTOXICITY</p> <p>A) Mutagenicity has been demonstrated in a salmonella mutagenicity study.</p> <p>B) Non-Hodgkin's lymphoma patients may be more likely to develop clonal chromosome aberrations in lymphoma cells.</p> <p>0.2.23 OTHER</p> <p>0.2.23.1 ACUTE EXPOSURE</p> <p>A) Inhalational abuse of pentane has been reported. Subcutaneously injected pentane may cause cellulitis and sterile abscess formation.</p>
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	<p><a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+107">http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+107</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>25. o- Xylene</p> <p>The main effect of inhaling xylene vapor is depression of the central nervous system, with symptoms such as headache, dizziness, nausea and vomiting. The effects listed below can begin to occur with exposure to air levels of about 100 ppm. They are reversible and become more noticeable and serious as the length of time of exposure increases [1] [Table 1].</p> <p>Table 1 Effect of xylene on the nervous system</p> <p>Effect of xylene on the central nervous system is attributed to the liposolubility of xylene in the neuronal membrane. It has been suggested that xylene disturbs the action of proteins essential to normal neuronal function either by disruption of the lipid environment in which the membrane proteins function or by direct interaction with the proteins in the membranes. [6] It has been suggested that a metabolic intermediate like methyl benzaldehyde could be responsible for the toxicity of xylene. Oxidation of xylene to these intermediates by microsomal enzyme systems may occur in the brain. [6] Changes in the levels of various neurotransmitters and lipid composition have been observed in several brain areas following acute- and intermediate-duration exposure to xylene. It is unclear whether these represent direct effects of xylene or are secondary changes resulting from nonspecific central nervous system depression.[7,8] Long-term exposure may lead to headaches, irritability, depression, insomnia, agitation, extreme tiredness, tremors, impaired concentration and short-term memory. This condition is sometimes generally referred to as “organic solvent syndrome.” Unfortunately, there is very little information available that isolates xylene from other solvent exposures in the examination of these effects.[2]</p> <p><b>EYES, NOSE AND THROAT</b></p> <p>Irritation of the nose and throat can occur at approximately 200 ppm after 3–5 min. Accidental splash in the eye may damage the surface of the eye, which will heal within a few days.</p> <p><b>LUNGS</b></p> <p>Exposure to xylene at levels of 200 ppm or greater can irritate the lungs, causing chest pain and shortness of breath. Extreme overexposure (e.g., in a confined space) can result in pulmonary edema, a potentially life-threatening condition in which the lungs fill with fluid. However, there is no evidence that repeated, low-level exposure has any long-term effects on the lung.</p> <p><b>LIVER AND KIDNEY</b></p> <p>At very high levels of exposure, xylene can injure the liver and kidneys, but this is extremely unlikely to happen without noticeable effects on the nervous system. Generally, such damage is reversible. Low-level occupational exposure does not affect the liver and the kidneys.</p> <p><b>BLOOD</b></p> <p>There is no evidence that exposure to xylene affects the blood cells in humans.</p>
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	<p>Earlier reports of low red blood cell counts (anemia) may have been due to contamination of xylene with benzene.</p> <p><b>GASTROINTESTINAL TRACT</b> Symptoms of nausea, vomiting and gastric discomfort were observed in workers exposed to xylene vapors (unspecified concentration), which were reversible.</p> <p><b>MUSCULOSKELETAL SYSTEM</b> Workers exposed to xylenes (TWA 14 ppm) reported reduced grasping power and reduced muscle power in the extremities more frequently than the unexposed controls. This is due to the neurological effect rather than a direct effect on the muscles.</p> <p><b>SKIN</b> Xylene, like other organic solvents, can dissolve the skin's natural protective oils. Frequent or prolonged skin contact can cause irritation and dermatitis, dryness, flaking and cracking of the skin. Damaged skin may allow greater absorption of chemicals. Xylene easily penetrates most ordinary clothing and can become trapped in ordinary gloves and boots. Xylene trapped in the clothing can cause burns and blistering.[1] <a href="http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2996004/">http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2996004/</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>26.     <b>-butoxy ethanol</b> Moderate respiratory exposure to 2-butoxyethanol often results in irritation of mucous membranes of the eyes, nose, and throat. Heavy exposure via respiratory, dermal or oral routes can lead to hypotension, metabolic acidosis,[15] hemolysis, pulmonary edema and coma.</p> <p><a href="http://en.wikipedia.org/wiki/2-Butoxyethanol">http://en.wikipedia.org/wiki/2-Butoxyethanol</a></p> <ol style="list-style-type: none"> <li>1.     The above gas/chemical must be tested on monthly bases.</li> <li>2.     The results must be publicly documented.</li> <li>3.     The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4.     All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>27.     <b>Bromoform</b></p> <ul style="list-style-type: none"> <li>• Eye irritation</li> <li>• Respiratory system irritation</li> <li>• Skin irritation</li> <li>• CNS depression</li> <li>• Burning mouth sensation</li> <li>• Salivation</li> <li>• Convulsions</li> <li>• Headache</li> <li>• Flushing</li> </ul>
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	<ul style="list-style-type: none"> <li>• Labored breathing</li> <li>• Memory loss</li> <li>• Shock</li> <li>• Liver damage</li> <li>• Kidney damage</li> <li>• Pinpoint pupils</li> <li>• Respiratory depression</li> <li>• Stupor</li> <li>• Tremor</li> </ul> <p><a href="http://www.rightdiagnosis.com/c/chemical_poisoning_bromoform/symptoms.htm#symptom_list">http://www.rightdiagnosis.com/c/chemical_poisoning_bromoform/symptoms.htm#symptom_list</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>28. 1,1,2,2-tetrachloroethane</p> <p>A few human deaths have been reported following excessive inhalation exposure to 1,1,2,2-tetrachloroethane. Immediately after World War I, gastrointestinal and neurological distress were reported following occupational exposure to a varnish containing 1,1,2,2-tetrachloroethane that was used to cover fabric airplane wings. Although workers generally recovered, at least 4 of 14 workers later became confused, delirious, comatose, and finally died (Willcox et al. 1915). Autopsies revealed extreme liver destruction and fatty degeneration of the liver. The levels of 1,1,2,2-tetrachloroethane in the air were not measured, so inhaled concentrations that may cause death in humans are not known. Inhalation of 1,1,2,2 tetrachloroethane has also been shown to cause death in animals. Mortality resulted from exposure to concentrations of 1,000–1,253 ppm for 4–6 hours in rats (Carpenter et al. 1949; Deguchi 1972; Schmidt et al. 1980b; Smyth et al. 1969), 1,168–5,900 ppm for 1.5–3 hours in mice (Horiuchi et al. 1962; Pantelitsch 1933), and 5,050–6,310 ppm for 30 minutes in rats and guinea pigs (NIOSH 1978). Mortality was reported in rats and mice repeatedly exposed to 1, 1, 2, 2 tetrachloroethane vapors (Horiuchi et al. 1962). For example, exposure of six male rats at a concentration of 9,000 ppm (2 hours/day, once/week for a total of five exposures) resulted in 100% mortality; three of the six rats died following the first exposure period. All nine male mice exposed to 1, 1, 2, 2-tetrachloroethane vapors at a concentration of 7,000 ppm for 2 hours once a week died during a 29-day study. All exposures from reliable studies that caused death in rats, mice, and guinea pigs.</p> <p><a href="http://www.atsdr.cdc.gov/toxprofiles/tp93-c3.pdf">http://www.atsdr.cdc.gov/toxprofiles/tp93-c3.pdf</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol>
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	<p>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</p> <p>29. Cumene</p> <p>No Adverse side effects noticeable at this time.</p> <p>30. Diethyl disulphide</p> <p>Ictal trials with DMSO were stopped because of questions about its safety, especially its ability to harm the eye. The most commonly reported side effects include headaches and burning and itching on contact with the skin. Strong allergic reactions have been reported. [full citation needed] DMSO can cause contaminants, toxins, and medicines to be absorbed through the skin, which may cause unexpected effects. DMSO is thought to increase the effects of blood thinners, steroids, heart medicines, sedatives, and other drugs. In some cases this could be harmful or dangerous.[2</p> <p><a href="http://en.wikipedia.org/wiki/Dimethyl_sulfoxide">http://en.wikipedia.org/wiki/Dimethyl_sulfoxide</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>31. Alpha-pinene</p> <p>Harmful by inhalation, in contact with skin and if swallowed. Irritating to eyes, respiratory system and skin. May cause sensitization by skin contact. Harmful: may cause lung damage if swallowed.</p> <p><a href="https://fs.ogm.utah.gov/bbooks/2012/12_Dec/Dockets/2010-027_M0470090A_LivingRivers/2010-027_20110218_LRsexhibit124%3BBeta-PineneHSDB.pdf">https://fs.ogm.utah.gov/bbooks/2012/12_Dec/Dockets/2010-027_M0470090A_LivingRivers/2010-027_20110218_LRsexhibit124%3BBeta-PineneHSDB.pdf</a></p> <p>Questions:</p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>32. Phenol</p> <p>Acute Effects:</p> <ul style="list-style-type: none"> <li>• Inhalation and dermal exposure to phenol is highly irritating to the skin, eyes, and mucous membranes in humans.</li> <li>• Symptoms of acute toxicity in humans include irregular breathing, muscle weakness and tremors, loss of coordination, convulsions, coma, and respiratory arrest at lethal doses.</li> <li>• Acute animal tests in rats, mice, and rabbits have shown phenol to have high acute toxicity from oral exposure. Chronic Effects (Noncancer):</li> </ul>
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	<ul style="list-style-type: none"> <li>• Anorexia, progressive weight loss, diarrhea, vertigo, salivation, and a dark coloration of the urine have been reported in chronically exposed humans. Gastrointestinal irritation and blood and liver effects have also been reported.</li> <li>• In one study, muscle pain, weakness, enlarged liver and elevated levels of liver enzymes were found in an individual after inhalation and dermal exposure to phenol and a few other chemicals.</li> <li>• Application of phenol to the skin results in dermal inflammation and necrosis. Cardiac arrhythmias have also been reported in humans exposed to high concentrations of phenol.</li> <li>• Chronic (it exceeds the acceptable rate) inhalation exposure of animals to phenol has shown central nervous systems (CNS), kidney, liver, respiratory, and cardiovascular effects. (• The Reference Dose (RfD) for phenol is 0.6 milligrams per kilogram body weight per day (mg/kg/d) based on reduced fetal body weights in rats. The RfD is an estimate (with uncertainty spanning perhaps an order of magnitude) of a daily oral exposure to the human population (including sensitive subgroups) that is likely to be without appreciable risk of deleterious noncancer effects during a lifetime. It is not a direct estimator of risk but rather a reference point to gauge the potential effects. At exposures increasingly greater than the RfD, the potential for adverse health effects increases. Lifetime exposure above the RfD does not imply that an adverse health effect would necessarily occur.</li> <li>• EPA has low confidence in the study on which the RfD was based because the dose was administered by gavage; medium confidence in the database because it contains several supporting studies (subchronic, chronic (it exceeds the acceptable rate), and reproductive/ developmental); and, consequently, low-to-medium confidence in the RfD.</li> <li>• EPA has established a provisional Reference Concentration (RfC) for phenol of 0.006 milligrams per cubic meter (mg/m<sup>3</sup>) based on no effects in rats, mice, or monkeys. The provisional RfC is a value that has had some form of Agency review, but it does not appear on IRIS. (Reproductive/ Developmental Effects: <ul style="list-style-type: none"> <li>• No studies were located concerning the developmental or reproductive effects of phenol in humans.</li> <li>• Animal studies have reported reduced fetal body weights, growth retardation, and abnormal development in the offspring of animals exposed to phenol by the oral route. Decreased maternal weight gain and increased maternal mortality were also observed.</li> </ul> <a href="http://www.epa.gov/ttn/atw/hlthef/phenol.html">http://www.epa.gov/ttn/atw/hlthef/phenol.html</a> <ol style="list-style-type: none"> <li>5. The above gas/chemical must be tested on monthly bases.</li> <li>6. The results must be publicly documented.</li> <li>7. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>8. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> </li> </ul> <p>33. -ethyltoluene</p> <ul style="list-style-type: none"> <li>• No information found.</li> </ul> <p>34. Decane.</p> <ul style="list-style-type: none"> <li>• No research found at this time.</li> </ul>
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	<p>35. Beta-pinene</p> <ul style="list-style-type: none"> <li>• SIGNS AND SYMPTOMS/ Absorption of large doses may result in delirium, ataxia, &amp; kidney damage. Inhalation may cause palpitation, dizziness, nervous disturbances, chest pain, bronchitis, and nephritis. /Pinene/ [Clayton, G. D. and F. E. Clayton (eds.). Patty's Industrial Hygiene and Toxicology: Volume 2A, 2B, 2C: Toxicology. 3rd ed. New York: John Wiley Sons, 1981-1982., p. 3243] **PEER REVIEWED**</li> </ul> <p>/SIGNS AND SYMPTOMS/ Harmful by inhalation, in contact with skin and if swallowed. Irritating to eyes, respiratory system and skin. May cause sensitization by skin contact. Harmful: may cause lung damage if swallowed. /(-)-Beta-pinene/ [Sigma-Aldrich; MSDS for (-)-beta-pinene. 6 pp. (January 29, 2006)] **PEER REVIEWED**</p> <p><a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+5615">http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+5615</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>36. -ethyltoluene</p> <p>No testing could be found at this time.</p> <p>37. 1,2,4-trimethylbenzene</p> <p>Effects of 1,2,4-trimethylbenzene on human health and the environment depend on how much TMB is present and the length and frequency of exposure. Effects also depend on the health of a person or the condition of the environment when exposure occurs.</p> <p>Breathing large amounts of 1, 2, 4-trimethylbenzene for short periods of time adversely affects the human nervous system. Effects range from headaches to fatigue and drowsiness. TMB vapor irritates the nose and the throat. Prolonged contact with liquid TMB irritates the skin. These effects are not likely to occur at levels of 1,2,4-trimethylbenzene that are normally found in the environment.</p> <p>Human health effects associated with breathing or otherwise consuming smaller amounts of 1,2,4-trimethylbenzene are not known. The petroleum industry has conducted several studies on the C9 fraction in response to an EPA request for testing. These studies show that repeat exposure to this mixture of chemicals in air adversely affects the reproductive system and the developing fetus of animals. EPA believes that adverse effects associated with exposure to the C9 fraction are similar to those expected to occur as a result of exposure to individual chemicals, like 1,2,4-tri-methylbenzene, that make up this mixture.</p> <p>1,2,4-Trimethylbenzene by itself is not likely to cause environmental harm at levels normally found in the environment. TMB can contribute to the formation of photochemical smog when it reacts with other volatile organic</p>
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	<p>carbon substance in air.</p> <p><a href="http://www.epa.gov/chemfact/f_trimet.txt">http://www.epa.gov/chemfact/f_trimet.txt</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>38. 1,3,5-trimethylbenzene</p> <p>/HUMAN EXPOSURE STUDIES/ ... Twenty-seven persons who worked for a number of years with a solvent called "Fleet-X-DV-99" containing 30% mesitylene /1,3,5-trimethylbenzene/ and 50% pseudocumene, /1,2,3-trimethylbenzene were studied/. A significant number of the exposed individuals complained of nervousness, tension, anxiety, and asthmatic bronchitis. In addition, the peripheral blood showed a tendency to hypochromic anemia and a deviation from normal in the coagulability of the blood. Hydrocarbon vapor concentrations ranged from 10 to 60 ppm. [American Conference of Governmental Industrial Hygienists, Inc. Documentation of the Threshold Limit Values and Biological Exposure Indices. 6th ed. Volumes I, II, III. Cincinnati, OH: ACGIH, 1991., p. 1648] **PEER REVIEWED**</p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>/SIGNS AND SYMPTOMS/ Effects of short-term exposure: The substance is irritating to the eyes, the skin and the respiratory tract. If this liquid is swallowed, aspiration into the lungs may result in chemical pneumonitis. The substance may cause effects on the central nervous system. Effects of long-term exposure: The liquid defats the skin. Lungs may be affected by repeated or prolonged exposure, resulting in chronic bronchitis. The substance may have effects on the central nervous system and blood. ...Use of alcoholic beverages enhances the harmful effect.</p> <p><a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+92">http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+92</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>38. 1,2,3-trichlorobenzene</p> <p>There is virtually no information regarding health effects of trichlorobenzenes in humans. However, based on results from studies in animals, it is reasonable</p>
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	<p>to predict that humans exposed to high amounts of trichlorobenzenes may develop liver problems.</p> <p>Studies in animals indicate that oral administration of trichlorobenzenes for short or long periods produces mainly alterations in the liver and kidneys. Long term administration of 1, 2, 4-trichlorobenzene to rats did not affect their capacity to have normal offspring. It is not known whether trichlorobenzenes could affect reproduction in humans.</p> <p><a href="http://www.atsdr.cdc.gov/toxfaqs/tf.asp?id=1169&amp;tid=255">http://www.atsdr.cdc.gov/toxfaqs/tf.asp?id=1169&amp;tid=255</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>39. 3-Carene</p> <p>No evidence of side effects at this time.</p> <p>40. 1,3-dichlorobenzene</p> <ul style="list-style-type: none"> <li>• Chronic (it exceeds the acceptable rate) exposure of humans to chlorobenzene affects the CNS. Signs of neurotoxicity include numbness, cyanosis, hyperesthesia (increased sensation), and muscle spasms.</li> <li>• Headaches and irritation of the mucosa of the upper respiratory tract and eyes have also been reported in humans chronically exposed via inhalation.</li> <li>• The CNS, liver, and kidneys have been affected in animals chronically exposed to chlorobenzene by inhalation.</li> <li>• Chronic (it exceeds the acceptable rate) ingestion of chlorobenzene has resulted in damage to the kidneys and liver in animals.</li> </ul> <p><a href="http://www.epa.gov/ttn/atw/hlthef/chlorobe.html">http://www.epa.gov/ttn/atw/hlthef/chlorobe.html</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>41. 1,4-dichlorobenzene</p> <p>Acute Effects:</p> <ul style="list-style-type: none"> <li>• Acute exposure to 1, 4-dichlorobenzene via inhalation in humans results in irritation to the eyes, skin, and throat. (2)</li> <li>• Animal studies have reported effects on the blood, liver, and kidneys from oral exposure to 1,4-dichlorobenzene. (1)</li> <li>• Tests involving acute exposure of rats and mice have shown 1,4-dichlorobenzene to have moderate toxicity from oral exposure. (3)</li> </ul> <p><a href="http://www.epa.gov/ttn/atw/hlthef/dich-ben.html">http://www.epa.gov/ttn/atw/hlthef/dich-ben.html</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley</li> </ol>
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	<p>Hills, Stevenson Ranch, and Live Oak.</p> <p>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</p> <p>42. 1,2,3-trimethylbenzene</p> <p>The substance is irritating to the eyes, the skin and the respiratory tract. The substance may cause effects on the central nervous system. If this liquid is swallowed, aspiration into the lungs may result in chemical pneumonitis. ...Use of alcoholic beverages enhances the harmful effect.</p> <p>[International Program on Chemical Safety/Commission of the European Communities; International Chemical Safety Card on 1,2,3-Trimethylbenzene (March 2001). Available from, as of October 9, 2007: <a href="http://www.inchem.org/pages/icsc.html">http://www.inchem.org/pages/icsc.html</a> **PEER REVIEWED**</p> <p>Skin, Eye and Respiratory Irritations: Irritates the eyes, skin, and respiratory tract. /Trimethyl benzenes/ [Sittig, M. Handbook of Toxic and Hazardous Chemicals and Carcinogens, 2002. 4th ed. Vol 1 A-H Norwich, NY: Noyes Publications, 2002., p. 2277] **PEER REVIEWED**</p> <p>Probable Routes of Human Exposure: NIOSH (NOES Survey 1981-1983) has statistically estimated that 279 workers (none of these are female) are potentially exposed to 1, 2, 3-trimethylbenzene in the US(1). Occupational exposure to 1, 2, 3-trimethylbenzene may occur through inhalation and dermal contact with this compound at workplaces where 1,2,3-trimethylbenzene is produced or used. Monitoring and use data indicate that the general population may be exposed to 1,2,3-trimethylbenzene via inhalation of ambient air, ingestion of food and drinking water, and dermal contact with this compound and other products containing 1,2,3-trimethylbenzene(SRC). [(1) NIOSH; NOES. National Occupational Exposure Survey conducted from 1981-1983. Estimated numbers of employees potentially exposed to specific agents by 2-digit standard industrial classification (SIC). Available at <a href="http://www.cdc.gov/noes/">http://www.cdc.gov/noes/</a> as of Nov 2007.] **PEER REVIEWED**</p> <p>1, 2, 3-Trimethylbenzene was found in the breathing zone of three copy centers at 0.4, 0.4 and 30.5 ppb(1). Screen printing plants sampled in Amsteram, The Netherlands, had indoor air concentrations of &lt;0.02 to 2.98 mg/cu m(2). 1,2,3-Trimethylbenzene was found in air return, work bench, overhead line 1, overhead line 3, overhead line 4 and air supply at 0.25, 0.32, 0.36, 0.39, 0.53 and 0.9 mg/cu m in a sheeted offset printing shop(3). Approximately 30% of 7,705 samples (solvent vapors, blood, urine) taken from the work place contained 1, 2, 3-trimethylbenzene(4).</p> <p><a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+7551">http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+7551</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol>
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	<p>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</p> <p>43. d-Limonene Test at this time shows no adverse effects.</p> <p>44. 1,2-dichlorobenzene</p> <p>1,2-Dichlorobenzene has been shown to cause eye and respiratory irritation in humans at exposure levels above 100 ppm. Skin irritation has been observed following dermal application in humans and animals. 1,2-Dichlorobenzene is absorbed via the oral route. Absorption via the dermal or inhalation routes is poorly characterized. Inhalation is expected to be the major route for human exposure. The available toxicological data indicate that metabolic profiles and effects from 1,2-dichlorobenzene exposure are similar in rats, mice and humans. Animal studies with rats and mice have shown 1,2-dichlorobenzene to induce acute hepatotoxic effects. The LD50 for a single oral exposure to 1,2-dichlorobenzene for the rat ranges from 1516 to 2138 mg/kg bw. The LC100 for the rat is <math>\leq</math> 977 ppm (5.9 mg/L) for a 10 hour exposure. During a 4 hour exposure, 1 of 20 rats died at 941 ppm (5.6 mg/L). In humans, the acute effects of 1,2-dichlorobenzene by ingestion or inhalation are reported to be headache, nausea, vomiting, vertigo, malaise and unconsciousness. Several oral studies of rats and mice ranging from 10 days to 2 years duration indicate that the adverse effects include increases in liver and kidney weights and hepatotoxicity. From these repeat dose studies, the NOAEL for non-neoplastic effects was 60 mg/kg bw, while the LOAEL was 120 mg/kg bw due to increased renal tubular regeneration in male mice. In several microbial organisms and mammalian systems, 1,2-dichlorobenzene tested negative in vitro. However, it did induce sister chromatid exchanges in Chinese Hamster ovary cells and increased mutation frequency in mouse lymphoma cells, both in the presence of metabolic activation. 1,2-dichlorobenzene was negative in several in vivo mammalian tests, except one of two micronuclei assays in mouse bone marrow was positive. In a two-year oral study in rats and mice, 1,2-dichlorobenzene was considered not to be carcinogenic (maximum dose of 120 mg/kg bw). In an inhalation 2-generation reproduction study in rats, no fertility effects were observed and reduced pup weight during lactation occurred at doses toxic to adults. The NOAEL and LOAEL (kidney and liver effects) for adult rats were 50 (0.3 mg/L) and 150 ppm (0.6 mg/L) respectively. In developmental studies in rats and rabbits, developmental effects were only seen in rats at maternally toxic doses (400 ppm, 2.4 mg/L). No human epidemiological studies have been conducted. ... 1,2-Dichlorobenzene has been tested on a wide range of aquatic organisms under acute exposure, although chronic data are scarce. Results for fish ranged from 96 hr LC50=1.58 mg/L for rainbow trout to 57 mg/L for fathead minnow. Both acute and chronic (it exceeds the acceptable rate) toxicity to aquatic invertebrates were obtained with two results showing high acute toxicity, namely EC50's of 0.78 mg/L and 0.66 mg/L to Daphnia and Ceriodaphnia respectively. Results from exposure to algae showed EC50 values in the 1-100 mg/L range for 1,2-dichlorobenzene. Toxicity to microorganisms can be considered slight. Although the major compartment expected to be exposed to 1,2-dichlorobenzene is the atmosphere, there are no ecotoxicity results available for organisms exposed through the gas phase. The chlorine substituents on the chemical suggest a potential for effects on stratospheric</p>
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	<p>ozone. However, the chemical is unlikely to persist long enough to escape the troposphere, although it may persist long enough to undergo long range atmospheric transport. While there are a large number of acute data covering all trophic levels, chronic data are scarce.</p> <p><a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+521">http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+521</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>45. 1,2,4-trichlorobenzene</p> <p>Human Toxicity Excerpts:  /SIGNS AND SYMPTOMS/ Cutaneous exposure to 1,2,4-trichlorobenzene does not cause chloracne or acneform dermatitis but can cause dermal irritation which is probably attributable to its defatting action. [American Conference of Governmental Industrial Hygienists. Documentation of the Threshold Limit Values and Biological Exposure Indices. 5th ed. Cincinnati, OH: American Conference of Governmental Industrial Hygienists, 1986., p. 593] **PEER REVIEWED**</p> <p>/SIGNS AND SYMPTOMS/ There is the potential for trichlorobenzene-induced hepatic toxicity in situations where exposures to high concentrations are encountered. [American Conference of Governmental Industrial Hygienists, Inc. Documentation of the Threshold Limit Values and Biological Exposure Indices. CD-ROM 2007.] **PEER REVIEWED**</p> <p>Skin, Eye and Respiratory Irritations:  Skin: may cause severe irritation. Prolonged contact may cause skin burns.  Eyes: Causes irritation. Levels greater than 5 ppm may cause severe irritation. [Sittig, M. Handbook of Toxic and Hazardous Chemicals and Carcinogens, 2002. 4th ed. Vol 1 A-H Norwich, NY: Noyes Publications, 2002., p. 2243] **PEER REVIEWED**</p> <p>Industrial data report ... minimal eye &amp; throat irritation at 3-5 ppm in certain people.  [American Conference of Governmental Industrial Hygienists, Inc. Documentation of the Threshold Limit Values and Biological Exposure Indices. 6th ed. Volumes I, II, III. Cincinnati, OH: ACGIH, 1991., p. 1605] **PEER REVIEWED**</p> <p>Solid 1,2,4-trichlorobenzene ... is irritating &amp; causes severe pain on contact with eyes. [Grant, W.M. Toxicology of the Eye. 3rd ed. Springfield, IL: Charles C. Thomas Publisher, 1986., p. 934] **PEER REVIEWED**</p> <p>Chlorinated benzenes are irritating to the skin, conjunctiva, and mucous membranes of the upper respiratory tract. ... /Chlorinated benzenes/</p>
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	<p>[Sittig, M. Handbook of Toxic and Hazardous Chemicals and Carcinogens, 1985. 2nd ed. Park Ridge, NJ: Noyes Data Corporation, 1985., p. 879] **PEER REVIEWED**</p> <p>Populations at Special Risk: /Individuals who suffer from/ skin, liver, kidney, or chronic respiratory disease, will be at an increased risk if they are exposed to chlorobenzenes. /Chlorobenzenes/ [Mackison, F. W., R. S. Stricoff, and L. J. Partridge, Jr. (eds.). NIOSH/OSHA - Occupational Health Guidelines for Chemical Hazards. DHHS(NIOSH) Publication No. 81-123 (3 VOLS). Washington, DC: U.S. Government Printing Office, Jan. 1981., p. 1] **PEER REVIEWED**</p> <p><a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+1105">http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+1105</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>46. 1,3,5-trichlorobenzene</p> <p>Skin, Eye and Respiratory Irritations: Chlorinated benzenes are irritating to the skin, conjunctiva, and mucous membranes of the upper respiratory tract. ... /Chlorinated benzenes/ [Sittig, M. Handbook of Toxic and Hazardous Chemicals and Carcinogens, 1985. 2nd ed. Park Ridge, NJ: Noyes Data Corporation, 1985., p. 879] **PEER REVIEWED**</p> <p>Populations at Special Risk: /Individuals who suffer from/ skin, liver, kidney, or chronic respiratory disease, will be at an increased risk if they are exposed to chlorobenzenes. /Chlorobenzenes/ [Mackison, F. W., R. S. Stricoff, and L. J. Partridge, Jr. (eds.). NIOSH/OSHA - Occupational Health Guidelines for Chemical Hazards. DHHS(NIOSH) Publication No. 81-123 (3 VOLS). Washington, DC: U.S. Government Printing Office, Jan. 1981., p. 1] **PEER REVIEWED**</p> <p>Probable Routes of Human Exposure: Occupational exposure to 1,3,5-trichlorobenzene may occur through inhalation and dermal contact with this compound at workplaces where 1,3,5-trichlorobenzene is produced or used. Monitoring data indicate that the general population may be exposed to 1,3,5-trichlorobenzene via inhalation of ambient air and ingestion of food. (SRC) **PEER REVIEWED**</p> <p>In a study of aerial fallout in Southern California (Spring 1976), five sampling sites showed median inhalation levels of less than 6 ng/sq m/day. [USEPA; Ambient Water Quality Criteria Doc: Chlorinated Benzenes p.C-35 USEPA-440/5-80-028 (1980)] **PEER REVIEWED**</p>
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	<p>Body Burden:  1,3,5-Trichlorobenzene has been detected in human blood samples (whole blood) in Canada at a concentration of 4.02 ng/g(1) and in 19% of human adipose tissue at a mean concentration of 126 ng/g(2). Combined trichlorobenzene and tetrachlorobenzene isomers were detected in human adipose tissue in Slovenia at a concentration of 60 ng/g and in human hair samples at 40 ng/g(3). 1,3,5-Trichlorobenzene was detected in human milk in Yugoslavia at concentrations of 0-3 ppb(4) and human milk in Canada at avg concentrations of 0.04 ng/g (whole milk) and 1.4 ng/g (milk fat)(5).  [(1) Mes J; Bull Environ Contam Toxicol 48: 815-20 (1992) (2) Mes J et al; Bull Environ Contam Toxicol 45: 681-88 (1990) (3) Zupancic-Kralj L, Jan J; Acta Chim Slov 41: 447-56 (1994) (4) Jan J; Bull Environ Contam Toxicol 30: 595-99 (1983) (5) Newsome WH et al; Chemosphere 30: 2143-53 (1995)]  **PEER REVIEWED**</p> <p><a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+132">http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+132</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>47. Benzyl acetate  No side effects at this time.</p> <p>48. Dodecane  No side effects at this time could be found.</p> <p>49. Tetradecane</p> <p>) ACUTE EFFECTS OF INHALATION: Cardiac dysrhythmias and CNS depression are major concerns of acute exposure. Straight chain hydrocarbons with few carbon atoms (eg, methane, ethane, propane gases) can cause asphyxiation if exposure occurs in poorly ventilated spaces.</p> <ol style="list-style-type: none"> <li>a) INHALATIONAL ABUSE ("sniffing") of some hydrocarbons can result in sudden death, encephalopathy, residual neurological impairment, nephrotoxicity, hepatotoxicity, acid-base disturbances, and rhabdomyolysis.</li> <li>4) INJECTION of kerosene, naphtha, turpentine, gasoline, or hydrocarbon insecticides has resulted in febrile reactions, local tissue inflammation and systemic effects, including pulmonary edema, pneumonia, and mild CNS depression. Severe cases have resulted in multiorgan dysfunction syndrome. Injection of pressurized hydrocarbons has caused severe tissue</li> </ol>
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		<p>damage.</p> <p>5) DERMAL/EYE: Mild to moderate eye irritation and reversible ocular injury may occur after contact with most hydrocarbons. Acute but prolonged exposure to some hydrocarbons can result in dermal burns and occasionally, systemic effects. Frostbite can result from contact with some liquefied gases (eg, propane, methane, ethane).</p> <p><a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+5728">http://toxnet.nlm.nih.gov/cgi-bin/sis/search/a?dbs+hsdb:@term+@DOCNO+5728</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>50. Methane</p> <p>Headaches may be triggered by getting exposed to methane gas. This sign was also observed in the school in Texas, where a methane gas blast killed about 300 students and faculty members.</p> <p>» Exposure to high levels of methane gas depletes the oxygen level in the body, causing difficulty in breathing and suffocation.</p> <p>» If the oxygen level in the body depletes to anything less than 12%, the person can become unconscious and prove to be lethal in some cases.</p> <p>» Since the levels of oxygen in the body depletes, the body tries to make it up by using the oxygen contained in the bodily fluids. This basically leads to dehydration.</p> <p>» Nausea and vomiting are also methane gas poisoning symptoms. There are chances that a person can collapse due to exposure to methane gas.</p> <p>» Another symptom is heart palpitations. It causes an uncomfortable sensation of the heart beating rapidly, abnormally and out of sequence.</p> <p>» Due to the depletion of oxygen in the body, it gives rise to cognitive problems. The person is inattentive, has memory loss and poor judgment. These symptoms aggravate, when the exposure to this gas is more.</p> <p>» Exposure to methane gas also causes dizziness and blurred vision. This symptom reduces, when the person moves away from the area that is high in methane gas concentration.</p> <p>» It also causes lack of motor coordination. Even in the most familiar surroundings, the person will knock things around. There are chances that the person will drop things he has picked up, more often.</p>
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	<p>» Some patients also display flu-like symptoms. The patient may also experience mental uneasiness and lethargy.</p> <p>» If methane gas is burnt and there is paucity of air, carbon monoxide will be produced. If carbon monoxide is produced in large quantities, it can prove to be fatal for the person.</p> <p><a href="http://www.buzzle.com/articles/methane-gas-exposure-symptoms.html">http://www.buzzle.com/articles/methane-gas-exposure-symptoms.html</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>51. Carbon dioxide</p> <p>Symptoms and signs of early hypercapnia include flushed skin, full pulse, tachypnea, dyspnea, extrasystoles, muscle twitches, hand flaps, reduced neural activity, and possibly a raised blood pressure. According to other sources, symptoms of mild hypercapnia might include headache, confusion and lethargy. Hypercapnia can induce increased cardiac output, an elevation in arterial blood pressure, and a propensity toward arrhythmias.[5][6] In severe hypercapnia (generally PaCO<sub>2</sub> greater than 10 kPa or 75 mmHg), symptomatology progresses to disorientation, panic, hyperventilation, convulsions, unconsciousness, and eventually death.[7]</p> <p><a href="http://en.wikipedia.org/wiki/Hypercapnia">http://en.wikipedia.org/wiki/Hypercapnia</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>52. Oxygen</p> <p>No side effects tested at this time.</p> <p>53. Nitrogen</p> <p>Nitrates and nitrites are known to cause several health effects. These are the most common effects:</p> <ul style="list-style-type: none"> <li>- Reactions with hemoglobin in blood, causing the oxygen carrying capacity of the blood to decrease (nitrite)</li> <li>- Decreased functioning of the thyroid gland (nitrate) Vitamin A shortages (nitrate)</li> <li>- Fashioning of nitro amines, which are known as one of the most common causes of cancer (nitrates and nitrites).</li> </ul> <p><a href="http://www.lenntech.com/periodic/elements/n.htm#Health%20effects%20of%2">http://www.lenntech.com/periodic/elements/n.htm#Health%20effects%20of%2</a></p>
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	<p><b>Onitrogen</b></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>54. Hydrogen</p> <p>No side effects at this time could be found.</p> <p>55. Ethylene</p> <p>Ethylene gas can affect you when breathed in.</p> <ul style="list-style-type: none"> <li>* Ethylene gas is HIGHLY FLAMMABLE and EXPLOSIVE. This is the major hazard of Ethylene exposure.</li> <li>* Exposure to the gas can cause you to feel dizzy, lightheaded, and to pass out.</li> <li>* Contact with liquid Ethylene could cause frostbite.</li> <li>* Ethylene may cause suffocation. Excessive amounts in the air in an enclosed space will decrease the amount of oxygen.</li> <li>* The health effects caused by exposure to Ethylene are much less serious than its FIRE and EXPLOSION RISK.</li> </ul> <p><a href="http://www.ejnet.org/plastics/polystyrene/ethylene.html">http://www.ejnet.org/plastics/polystyrene/ethylene.html</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>56. Ethane</p> <p><b>Inhalation</b> : High concentrations of ethane so as to exclude an adequate supply of oxygen to the lungs causes' dizziness, deeper breathing due to air hunger, possible nausea and eventual unconsciousness. Contact with rapidly evaporating liquid can cause cryogenic "burns" or frostbite.</p> <p><a href="http://www.orcbs.msu.edu/msds/LINDE_MSDS/pdf/024.pdf">http://www.orcbs.msu.edu/msds/LINDE_MSDS/pdf/024.pdf</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>57. Acetylene</p>
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		<p>Inhaling acetylene may cause dizziness, headache and nausea. [3] It may also contain toxic impurities: the Compressed Gas Association Commodity Specification for acetylene has established a grading system for identifying and quantifying phosphine, arsine, and hydrogen sulfide content in commercial grades of acetylene in order to limit exposure to these impurities. The sulfur, phosphorus and arsenic are carryovers from the synthesis ingredient coke, an impure form of carbon and different, organic impurities would be expected from the thermal cracking of hydrocarbons source.</p> <p><a href="http://www.newworldencyclopedia.org/entry/Acetylene">http://www.newworldencyclopedia.org/entry/Acetylene</a></p> <p>58. Propane</p> <p>Burning sensation Convulsions Cough Diarrhea Dizziness Fever Heartbeat - irregular Heartbeat - rapid Lightheadedness Loss of consciousness Nausea Nervousness Pain and numbness in arms and legs Skin irritation Slow and shallow breathing Unconsciousness Vomiting Weakness</p> <p><a href="http://www.nlm.nih.gov/medlineplus/ency/article/002836.htm">http://www.nlm.nih.gov/medlineplus/ency/article/002836.htm</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>59. Butane</p> <p>Inhalation of butane can cause euphoria, drowsiness, narcosis, asphyxia, cardiac arrhythmia, fluctuations in blood pressure, temporary memory loss and frostbite, and can result in death from asphyxiation and ventricular fibrillation. Butane is the most commonly misused volatile substance in the UK, and was the cause of 52% of "solvent related" deaths in 2000.[11] By spraying butane directly into the throat, the jet of fluid can cool rapidly to -20 °C by expansion, causing prolonged laryngospasm.[12] "Sudden sniffer's death" syndrome, first described by Bass in 1970,[13] is the most common single cause of "solvent related" death, resulting in 55% of known fatal cases.</p>
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	<p><a href="http://en.wikipedia.org/wiki/Butane">http://en.wikipedia.org/wiki/Butane</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>60. Carbon monoxide</p> <p>Signs and symptoms of carbon monoxide poisoning may include:</p> <ul style="list-style-type: none"> <li>• Dull headache</li> <li>• Weakness</li> <li>• Dizziness</li> <li>• Nausea</li> <li>• Vomiting</li> <li>• Shortness of breath</li> <li>• Confusion</li> <li>• Blurred vision</li> </ul> <p><a href="http://www.mayoclinic.org/diseases-conditions/carbon-monoxide/basics/symptoms/con-20025444">http://www.mayoclinic.org/diseases-conditions/carbon-monoxide/basics/symptoms/con-20025444</a> Loss of consciousness</p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>61. Hydrogen sulphide</p> <p>What about longer term health effects? Some people who breathed in levels of hydrogen sulfide high enough to become unconscious continue to have headaches and poor attention span, memory, and motor function after waking up. Problems with the cardiovascular system have also been reported at exposures above permissible exposure limits. People who have asthma may be more sensitive to hydrogen sulfide exposure. That is, they may have difficulty breathing at levels lower than people without asthma.</p> <p><a href="https://www.osha.gov/SLTC/hydrogensulfide/hazards.html">https://www.osha.gov/SLTC/hydrogensulfide/hazards.html</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>62. Helium</p> <p>No serious side effects at this time.</p>
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	<p>63. Mercury  Common symptoms of mercury poisoning include peripheral neuropathy (presenting as paresthesia or itching, burning or pain), skin discoloration (pink cheeks, fingertips and toes), swelling, and desquamation (shedding or peeling of skin). Mercury irreversibly inhibits selenium-dependent enzymes (see below) and may also inactivate S-adenosyl-methionine, which is necessary for catecholamine catabolism by catechol-o-methyl transferase. Due to the body's inability to degrade catecholamines (e.g. epinephrine), a person suffering from mercury poisoning may experience profuse sweating, tachycardia (persistently faster-than-normal heart beat), increased salivation, and hypertension (high blood pressure). Affected children may show red cheeks, nose and lips, loss of hair, teeth, and nails, transient rashes, hypotonia (muscle weakness), and increased sensitivity to light. Other symptoms may include kidney dysfunction (e.g. Fanconi syndrome) or neuropsychiatric symptoms such as emotional lability, memory impairment, and / or insomnia.  <a href="http://en.wikipedia.org/wiki/Mercury_poisoning">http://en.wikipedia.org/wiki/Mercury_poisoning</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>64. Terpenes  No risk could be found at this time.</p> <p>65. Hexamethylcyclotrisiloxane  Could not find side effects at this time.</p> <p>66. Octamethylcyclotetrasiloxane  EFFECTS OF SHORT-TERM EXPOSURE:  The substance irritates the eyes and the skin.  <a href="http://actrav.itcilo.org/actrav-english/telearn/osh/ic/556672.htm">http://actrav.itcilo.org/actrav-english/telearn/osh/ic/556672.htm</a>  Questions:</p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>67. Decamethylcyclopentasiloxane  No side effects could be found at this time.</p> <p>68. Hexamethyldisiloxane</p>
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	<p>Although ingestion is not thought to produce harmful effects, the material may still be damaging to the health of the individual following ingestion, especially where pre-existing organ (e.g. Silicone fluids do not have a high acute toxicity). They may have a laxative effect and produce central nervous system depression. High molecular weight material; on single acute exposure would be expected to pass through gastrointestinal tract with little change /absorption. Occasionally accumulation of the solid material within the alimentary tract may result in formation of a bezoar (concretion), producing discomfort. EYE! There is some evidence to suggest that this material can cause eye irritation and damage in some persons. Eye exposure to silicone fluids causes temporary irritation of the conjunctiva. Injection into the specific structures of the eye, however, causes corneal scarring, permanent eye damage, allergic reactions and cataract, and may lead to blindness, SKIN the material is not thought to produce adverse health effects or skin irritation following contact (as classified using animal models). Nevertheless, good hygiene practice requires that exposure be kept to a minimum and that suitable gloves be used in an occupational setting. Skin contact is not thought to have harmful health effects; however the material may still produce health damage following entry through wounds, lesions or abrasions. There is some evidence to suggest that the material may cause mild but significant inflammation of the skin either following direct contact after a delay of some time. Repeated exposure can cause contact dermatitis which is characterized by redness, swelling and blistering. Low molecular weight silicone fluids may exhibit solvent action and may produce skin irritation. INHALED the material is not thought to produce adverse health effects or irritation of the respiratory tract (as classified using animal models). Nevertheless, good hygiene practice requires that exposure be kept to a minimum and that suitable control measures be used in an occupational setting.</p> <p>Inhalation hazard is increased at higher temperatures. Vapors of silicones are generally fairly well tolerated, however very high concentrations can cause death within minutes due to respiratory failure. At high temperatures, the fumes and oxidation products can be irritating and toxic and can cause depression leading to death in very high doses.</p> <p><a href="http://datasheets.scbt.com/sc-250106.pdf">http://datasheets.scbt.com/sc-250106.pdf</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>69. Octamethyltrisiloxane</p> <p>No serious effects are known at this time.</p> <p>70. Decamethyltetrasiloxane</p> <p>Eye exposure to silicone fluids causes temporary irritation of the conjunctiva. Injection into the specific structures of the eye, however, causes corneal carring, permanent eye damage, allergic reactions and cataract, and may lead to</p>
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	<p>blindness</p> <p><a href="http://datasheets.scbt.com/sc-239653.pdf">http://datasheets.scbt.com/sc-239653.pdf</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>71. Dodecamethylpentasiloxane.</p> <p>No known side effects at this time.</p> <p>72. Dodecamethylcyclohexasiloxane</p> <p>No evidence of side effects at this time.</p> <p>73. Arsenic</p> <ul style="list-style-type: none"> <li>• Vomiting</li> <li>• Abdominal pain</li> <li>• Diarrhea</li> <li>• Dark urine (termed black water urine)</li> <li>• Dehydration</li> <li>• Cardiac problems</li> <li>• Hemolysis (destruction of red blood cells)</li> <li>• Vertigo</li> <li>• Delirium</li> <li>• Shock</li> <li>• Death</li> </ul> <p><a href="http://www.medicinenet.com/arsenic_poisoning/page3.htm#what_are_the_symptoms_of_arsenic_poisoning">http://www.medicinenet.com/arsenic_poisoning/page3.htm#what_are_the_symptoms_of_arsenic_poisoning</a></p> <ol style="list-style-type: none"> <li>1. The above gas/chemical must be tested on monthly bases.</li> <li>2. The results must be publicly documented.</li> <li>3. The public must be made aware of the results especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> <li>4. All violations must be made known to the public, especially Val Verde, Hasley Hills, Stevenson Ranch, and Live Oak.</li> </ol> <p>74. Butyric acid</p> <p>No evidence found at this time.</p> <p>75. Aldehydes &amp; Ketones</p> <p>No evidence found at that this time.</p>
	<p>Traffic and the potential to sickness/cancer is greatly raised due to the increase of traffic in the area.</p> <p>According to the DEIR 10.5.2.7Summary The traffic would be much higher then what they now receive. The project</p>

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49-13

		<p>entrance is proposed to improve access to the site and will not substantially increase hazards due to a design feature or affect emergency access to the site or any other property. The queuing analysis shows that the storage provided at the CCL main entrance will be able to accommodate the projected number of vehicles arriving to the site throughout the day and will provide enough storage to accommodate projected CCL traffic without queuing onto public roadways. Queuing calculations were also done for the HHWF driveway. The analysis shows that the HHWF can accommodate up to 243 vehicles on a typical event day.</p> <p><b>Also of concern is that the landfill would be allowed to work 24 hours a day, for six days a week.</b></p> <p>“• CCL is permitted to be open 24 hours per day, 6 days per week. This Provides CCL the operational flexibility to coordinate with customers and arrange to be open when loads are anticipated. Therefore, there are never extended periods of time when vehicles would not be processed through the scales and forced to queue without release... historically there are no trips between 5:00 p.m. and 10:00 p.m. This is because CCL customers have historically not arranged to bring loads during this time. If needed, CCL would serve customers during this time as well.”</p> <p><b>There is great concern; residents already complain about the hours of the landfill and the lack of sleep that they receive from it now. They say the trucks wake them up early. This is due to the fact that the closest house is about 800 feet from the landfill. With 24 hours a day, day after day, the lack of sleep will be greatly increased. The other concern is that with the level of breathing problems we now have in Val Verde it will give no breaks at all for the lungs of the inflicted to repair from the constant bombardment of diesel exhaust.</b></p> <p><b>Nowhere in the draft DEIR does it mention the possible increase of cancer to the much higher volume of diesel CO<sub>2</sub> being poured hour after hour into the communities of Val Verde, Hasley Hills, and Live Oak communities.</b></p> <p><b>According to a paper by School of Social Ecology University of California, Irvne, which is titled Environmental Analysis of the Proposed Chiquita Canyon Landfill Expansion (December, 2005) the impact would be major. Using EPA’s air dispersion model, ISCST3, wand ArcGIS, we have modeled and mapped the potential cancer risks directly associated with the proposed CCL expansion. The reauthorized Clean Air Act stipulates a cancer risk threshold to Maximum Exposed Individual (MEI) of no more than one in one million. Our hypothesis continues that the proposed expansion will greatly exceed this significance threshold.” The paper goes on to say “Cancer risk for Val Verde residents ranged from 50 to 200 in one million due to diesel exhaust from the landfill equipment emissions...In summary, the models show that a majority of residents experience a cumulative cancer risk over 100 in one million, which is 100 times greater than the Clean Air Act’s cancer risk threshold of 1 in one million, due only to air toxics from the landfill.</b></p> <p><b>The possible expansion of the landfill, the environmental impact on a</b></p>
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49-14

		<p><b>human's health would be more then significant. The cancer rate would increase to 100 in a million, which is way above the EPA guidelines of less than 1 in a million. This total disregard for human life is unacceptable. The fact that the exhaust is not factored into the Draft DEIR is also unacceptable.</b></p> <p><b>The landfill has greatly deceived the community by failing to include this information in the draft DEIR. The landfill is a limited liability company and could not afford the possible law suits that will arise from such negligence.</b></p> <p><b>An expansion cannot be allowed until the landfill designs a plan that would mitigate the constant deadly exhaust that will be poured into the communities of Val Verde, Hasley Hills, and Live Oaks.</b></p> <p><b>The dangers of the exhaust must be outlined in the draft DEIR for the communities to easily understand. The dangers must be shared at all town council meetings within a 5 mile radius prior to and after the approval of the Draft DEIR. The dangers of the high volume of Diesel exhaust must be in all closing papers for any house or business bought within a 20 mile radius. LLC must provide documentation that outlines how they will meditate the cost of any health issues that will/may occur on the residents within a 5 mile radius.</b></p> <p><b>The burning of waste at the CCL is also of great concern. The residents are told that it is safe and nothing escapes. The residents were also told that they never took sludge. So, lies are common.</b></p> <p><b>According to Waste Management in Virginia landfill gases and chemicals do escape in the burning process of a landfill." When Arlington County/Alexandria burns their solid waste in an incinerator, it minimizes water and ground pollution...but some percentage of gases escape the filters on the smokestacks and pollute the air." If it happens in their landfill, it is more than safe to assume that it happens in our landfill. <a href="http://virginiaplaces.org/waste/index.html">http://virginiaplaces.org/waste/index.html</a></b></p> <p><b>Due to the fact that Val Verde has now verified that there are more breathing disorders in our community; we demand that either the landfill meets all request for equipment and gas testing above or give the operations over to the county, or close down.</b></p>
11.3.3.2	Air Monitoring Data	<p>DEIR States: Ambient air quality data were taken from data published by CARB (on the Aerometric Data Analysis and Management [ADAM] website) and EPA (on the AirData website). Ambient concentrations of ozone, NO<sub>2</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are recorded at monitoring stations located throughout the South Coast Air Basin, in which CCL is located. Three of the nearest monitoring stations were used to gather information regarding the air quality around Chiquita Canyon: Burbank–W Palm Avenue, Reseda, and Santa Clarita stations. The Santa Clarita station is the closest to the project site, approximately 7 miles from the landfill entrance. SO<sub>2</sub> and PM<sub>2.5</sub> monitoring data are not available at the Santa Clarita station, therefore, the Burbank and Reseda stations were used for SO<sub>2</sub> and PM<sub>2.5</sub> data, respectively. A summary of the maximum monitored criteria pollutant concentrations is presented in Table 11-2.</p>

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		<p><b>Please clarify how accurate the data is due to the Santa Susana Mountain range between Santa Clarita Valley and San Fernando Valley. The residents are extremely concerned because they do not feel that CCL pollutants could be separately monitored with Sunshine Canyon Landfill located in between CCL and the monitoring stations. There is no evidence that CCL has ever been accurately measured. Please include how CCL will specifically without Sunshine Canyon Landfill.</b></p>	49-15 cont'd
Table 11-2	Attainment Designations of the Project Area	<p>Please see Table 11-2, Page 11-5</p> <p>DEIR States:  a Source: EPA, 2013c, <a href="http://www.epa.gov/airquality/airdata/ad_rep_mon.html">http://www.epa.gov/airquality/airdata/ad_rep_mon.html</a>, as of April 2013.  b Source: CARB, 2013d, <a href="http://www.arb.ca.gov/adam/topfour/topfour1.php">http://www.arb.ca.gov/adam/topfour/topfour1.php</a>, as of April 2013.</p> <p>Notes:  Monitoring data were taken from the Santa Clarita Monitoring Station monitor, with the exception of SO<sub>2</sub> data, which were taken from the Burbank station, and PM<sub>2.5</sub> data, which were taken from the Reseda station.</p> <p>Hydrogen sulfide, vinyl chloride, and visibility - reducing particles are not monitored.</p> <p>µg/m<sup>3</sup>= micrograms per cubic meter</p> <p>ppm = parts per million (by volume)</p> <p><b>This is a violation according CARB Compliance. The residents cannot accept this DEIR due to the landfill not currently honoring its requirements.</b></p>	49-16
Table 11-2	Summary of Monitoring Data – Maximum Concentrations	<p>Please See Table 11-2 on page 11-6 &amp; 11-7</p> <p><b>In the Ozone section it is noticeable that the table stops in 2011. Please provide the updated data that is missing. In order for the residents to properly address the DEIR this information is critical. The residents have used this table throughout the entire DEIR and have now realized it is out dated. This appears to be deceptive on the part of CCL.</b></p>	49-17
Table 11-2	Coarse Particulates (PM <sub>10</sub> )	<p>DEIR states:  PM<sub>10</sub> can have damaging effects on health by getting deep into lungs and interfering with the body's mechanism for clearing the respiratory tract; some particles may also get into the bloodstream. Exposure to particulate is linked to a variety of problems including aggravated asthma, increased respiratory symptoms, decreased lung function, chronic bronchitis, irregular heartbeat, nonfatal heart attacks, and premature death in people with heart or lung disease. PM<sub>10</sub> can also be carried over long distances by wind and settle on ground or water, increasing the acidity of lakes and rivers, changing nutrient balance in coastal waters and river basins, depleting soil nutrients, damaging sensitive forests and farm crops, and impacting ecosystem diversity. Table 11-2 shows the PM<sub>10</sub> levels reported at the Santa Clarita monitoring station during the period beginning in 2009 and ending in 2011, as well as the number of days in</p>	49-18

		<p>which the state and federal standards were exceeded. Annual and 24-hour state standards were exceeded in 2009. The federal 24-hour standard was not exceeded between 2009 and 2011.</p> <p><b>The word “exceeded” is vague, therefore we need to know how much each gas / chemical was exceeded by. The severity of health effects should be clearly list per each increment. CCL needs to be bonded due to the severity of the health effects already incurred by the neighboring residents. This is should be expected to elevate with the proposed DEIR.</b></p>	49-18 cont'd
Table 11-2	Fine Particulates (PM <sub>2.5</sub> )	<p>Fine Particulates (PM<sub>2.5</sub>) Fine particulates in the air are caused by a combination of particles emitted from combustion sources (usually carbon particles) , and organic, sulfate, and nitrate aerosols formed in the air from emitted hydrocarbons, SO<sub>x</sub>, and NO<sub>x</sub>. In 1997, EPA established 24 -hour and annual arithmetic mean standards for PM<sub>2.5</sub>. EPA completed its designation of PM<sub>2.5</sub> attainment and nonattainment areas in 2004. PM<sub>2.5</sub> requirements are currently in full effect. PM<sub>2.5</sub> can have damaging effects on health by getting deep into lungs and interfering with the body’s mechanism for clearing the respiratory tract; some particles may also get into the bloodstream. Exposure to particulate is linked to a variety of problems including aggravated asthma, increased respiratory symptoms, decreased lung function, chronic bronchitis, irregular heartbeat, nonfatal heart attacks, and premature death in people with heart or lung disease. PM<sub>2.5</sub> is also a major cause of reduced visibility. Table 11-2 shows the PM<sub>2.5</sub> levels reported at the Reseda monitoring station during the period beginning in 2009 and ending in 2011, as well as the number of exceedances of the state and federal standards. The Santa Clarita monitoring station does not monitor for PM<sub>2.5</sub> levels; therefore, the PM<sub>2.5</sub> data were from the Reseda station. The PM<sub>2.5</sub> state and federal standards were not exceeded at this station between 2009 and 2011.</p> <p><b>The word “exceeded” is vague, therefore we need to know how much each gas / chemical was exceeded by. The severity of health effects should be clearly list per each increment. CCL needs to be bonded due to the severity of the health effects already incurred by the neighboring residents. This is should be expected to elevate with the proposed DEIR.</b></p>	49-19
11.4.3.2	SCAQMD Regulations	<p>DEIR states the following: A project is required to be in compliance with SCAQMD regulations and rules. The Proposed Project construction and operation will be subject to Rule 403 (Fugitive Dust), which requires specific actions or measures to prevent, reduce, or mitigate particulate matter emissions generated from man - made fugitive dust sources. Required actions for each fugitive dust source within the active operation are listed in Rule 403 Table 1, Best Available Control Measures. Additional requirements for large operations with 50 acres or more of disturbed surface area, or with a daily earth - moving or throughput volume of 5,000 cubic yards are listed in Rule 403 Tables 2 and 3. However, the requirements for larger operations do not apply to this project.</p> <p><b>Please clarify how Rule 403 does not apply to this project as it clearly is at or above these relation sizes.</b></p>	49-20
11.4.3.2	SCAQMD Regulations	<p>DEIR states the following: Operation of the equipment installed for the Proposed Project will be subject to SCAQMD Rules 201 and 206 permitting requirements and other operational and emission limits in the rules, unless such requirements are exempt by the regulations. Current landfill operations are</p>	49-21

		<p>subject to Rule 206, and a Title V operating permit has been issued for the landfill (facility ID 119219). This permit limits emissions from the existing flares and requires odor mitigation.</p> <p><b>RULE 201. PERMIT TO CONSTRUCT</b>  A person shall not build, erect, install, alter or replace any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce or control the issuance of air contaminants without first obtaining written authorization for such construction from the Executive Officer. A permit to construct shall remain in effect until the permit to operate the equipment or agricultural permit unit for which the application was filed is granted or denied, or the application is canceled.</p> <p><b>Please clarify/supple all permits, all machines, all permits for the machines, all modifications to the machines, and all permits allowing the modifications, Please include all future machines as the machines you use now have deterioration and are not up to current industry standards.</b></p>	49-21 cont'd
11.4.3.2	SCAQMD Regulations continued	<p>DEIR states the following: Operation of the equipment installed for the Proposed Project will be subject to SCAQMD Rules 201 and 206 permitting requirements and other operational and emission limits in the rules, unless such requirements are exempt by the regulations. Current landfill operations are subject to Rule 206, and a Title V operating permit has been issued for the landfill (facility ID 119219). This permit limits emissions from the existing flares and requires odor mitigation.</p> <p>(a) A person granted a permit under Rule 202 or 203 shall not operate or use any equipment unless the entire permit to operate or a legible facsimile of the entire permit is affixed upon the equipment in such manner that the permit number, equipment description, and the specified operating conditions are clearly visible and accessible. In the event that the equipment is so constructed or operated that the permit to operate or a legible facsimile cannot be so placed, the entire permit to operate or the legible facsimile of the entire permit shall be mounted so as to be clearly visible in an accessible place within 8 meters (26 feet) of the equipment, or as otherwise approved in writing by the Executive Officer.</p> <p>(b) Notwithstanding subdivision (a), a facility permit shall be kept at the location for which it is issued, and be made available to authorized District personnel, upon request</p> <p><b>Please clarify the location of all permits.</b></p>	49-22
11.4.3.2	Prohibitory Rules (Regulation IV)	<p>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  <b>RULE 401 -- VISIBLE EMISSIONS</b>  (Adopted Feb. 4, 1977)(Amended Apr. 1, 1977)(Amended Aug. 4, 1978)  (Amended Sept. 7, 1979)(Amended Feb. 1, 1980)(Amended July 11, 1980)  (Amended Oct. 15, 1982)(Amended Mar. 2, 1984)(Amended Feb. 5, 1988)  (Amended April 7, 1989)(Amended September 11, 1998) (Amended November 9, 2001)</p> <p>(a) Definitions  For the purpose of this rule, the following definitions shall apply:  (1) KEROSENE FUEL is petroleum distillate fuel meeting diesel grade 1-D per</p>	49-23

		<p>ASTM D975-78, fuel oil grade No. 1 per ASTM D396-79, or kerosene by conventional commercial specifications.</p> <p>(2) AN APPROVED SMOKE-REDUCING FUEL ADDITIVE is as approved by the Executive Officer.</p> <p>(3) A SYNTHETIC ENGINE LUBRICATING OIL is as approved by the Executive Officer.</p> <p>(b) Requirements</p> <p>(1) A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:</p> <p>(A) As dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or</p> <p>(B) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (b)(1)(A) of this rule.</p> <p>(2) Notwithstanding the provisions of paragraph (b)(1) of this rule, a person shall not discharge into the atmosphere from a commercial charbroiler, excluding those operating with control equipment and those which are chain-driven, or equipment for melting, heating, or holding asphalt or coal tar pitch for on-site roof construction or repair; any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:</p> <p>(A) As dark or darker in shade as that designated No. 2 on the Ringelmann Chart, as published by the United States Bureau of Mines; or Rule</p> <p>(B) Of such an opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (b)(2)(A) of this rule.</p> <p>(3) Notwithstanding the provisions of paragraph (b)(1) of this rule, a person shall not discharge into the atmosphere from any diesel pile-driving hammer, operating exclusively using kerosene fuel, containing approved smoke-reducing fuel additives, as the sole fuel, and using only synthetic engine lubrication oil, or other method deemed technologically and economically feasible by the Executive Officer, any air contaminant for a period or periods aggregating more than four minutes during the driving of a single pile which is:</p> <p>(A) As dark or darker in shade as that designated No. 2 on the Ringelmann Chart, as published by the United States Bureau of Mines; or</p> <p>(B) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (b)(3)(A) of this rule.</p> <p>(c) Exemptions</p> <p>(1) The provisions of this rule shall not apply to the following operations:</p> <p>(A) Asphalt pavement heater operations;</p> <p>(B) Abrasive blasting operations;</p> <p>(C) The use of visible emission generating equipment in training sessions conducted by governmental agencies necessary for certifying persons to evaluate visible emissions for compliance with this rule and with the California Health and Safety Code, Section 41704 (I).</p> <p>(D) Visible emissions from ships which perform emergency boiler shutdowns, tests required by governmental agencies or maneuvers for safety purposes;</p> <p>(E) Agricultural operations.</p> <p>(2) The provisions of paragraph (b)(2) shall not apply to a commercial charbroiler, as described in paragraph (b)(2), on or after November 9, 2005, and thereafter the provisions of paragraph (b)(1) shall apply to such equipment.</p>
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		<p><b>Please clarify all sources in which a person would be fire a discharge into the atmosphere. Please list all equipment that will be discharging to the atmosphere at any given times. Please list the reasons they would be discharging into the atmosphere. Please list the amount of time each piece of equipment will be expected to discharge into the atmosphere. Please clarify and list all visible emissions generating equipment in training sessions that have been conducted by governmental agencies to certify persons so they can evaluate visible emissions for compliance with this rule and with the California Health and Safety Code, Section 42704(I)</b></p>	49-23 cont'd
11.4.3.2	Prohibitory Rules (Regulation IV)	<p>(Adopted May 7, 1976)  <b>RULE 402. NUISANCE</b>  A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.</p> <p><b>Please clarify what those contaminants or materials are consider to cause injury, detriment, nuisance, or annoyance. Please clarify what number is being use as a considerable number of persons and/or who you consider to be the public. Please clarify what you are using to measure whether those aforementioned contaminate or materials that have a tendency to cause, injure, or damage business or property.</b></p>	49-24
11.4.3.2	Prohibitory Rules (Regulation IV)	<p><b>RULE 403 -- FUGITIVE DUST</b>  (Adopted: May 7, 1976)(Amended: November 6, 1992, July 9, 1993, February 14, 1997, December 11, 1998, April 2, 2004, June 3, 2005) (a) Purpose The purpose of this Rule is to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (man-made) fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions. (b) Applicability The provisions of this Rule shall apply to any activity or man-made condition capable of generating fugitive dust. (c) Definitions  (1) ACTIVE OPERATIONS means any source capable of generating fugitive dust, including, but not limited to, earth-moving activities, construction/demolition activities, disturbed surface area, or heavy- and light-duty vehicular movement.  (2) AGGREGATE-RELATED PLANTS are defined as facilities that produce and / or mix sand and gravel and crushed stone.  (3) AGRICULTURAL HANDBOOK means the region-specific guidance document that has been approved by the Governing Board or hereafter approved by the Executive Officer and the U.S. EPA. For the South Coast Air Basin, the Board-approved region- specific guidance document is the Rule 403 Agricultural Handbook dated December 1998. For the Coachella Valley, the Board-approved region-specific guidance document is the Rule 403 Coachella Valley Agricultural Handbook dated April 2, 2004.  (4) ANEMOMETERS are devices used to measure wind speed and direction in accordance with the performance standards, and maintenance and calibration criteria as contained in the most recent Rule 403 Implementation Handbook.  (5) BEST AVAILABLE CONTROL ME ASURES means fugitive dust control actions that are set forth in Table 1 of this Rule.</p>	49-25

	<p>(6) BULK MATERIAL is sand, gravel, soil, aggregate material less than two inches in length or diameter, and other organic or inorganic particulate matter.</p> <p>(7) CEMENT MANUFACTURING FACILITY is any facility that has a cement kiln at the facility.</p> <p>(8) CHEMICAL STABILIZERS are any non-toxic chemical dust suppressant which must not be used if prohibited for use by the Regional Water Quality Control Boards, the California Air Resources Board, the U.S. Environmental Protection Agency (U.S. EPA), or any applicable law, rule or regulation. The chemical stabilizers shall meet any specifications, criteria, or tests required by any federal, state, or local water agency. Unless otherwise indicated, the use of a non-toxic chemical stabilizer shall be of sufficient concentration and application frequency to maintain a stabilized surface.</p> <p>(9) COMMERCIAL POULTRY RANCH means any building, structure, enclosure, or premises where more than 100 fowl are kept or maintained for the primary purpose of producing eggs or meat for sale or other distribution.</p> <p>(10) CONFINED ANIMAL FACILITY means a source or group of sources of air pollution at an agricultural source for the raising of 3,360 or more fowl or 50 or more animals, including but not limited to, any structure, building, installation, farm, corral, coop, feed storage area, milking parlor, or system for the collection, storage, or distribution of solid and liquid manure; if domesticated animals, including horses, sheep, goats, swine, beef cattle, rabbits, chickens, turkeys, or ducks are corralled, penned, or otherwise caused to remain in restricted areas for commercial agricultural purposes and feeding is by means other than grazing.</p> <p>(11) CONSTRUCTION/DEMOLITION ACTIVITIES means any on-site mechanical activities conducted in preparation of, or related to, the building, alteration, rehabilitation, demolition or improvement of property, including, but not limited to the following activities: grading, excavation, loading, crushing, cutting, planning, shaping or ground breaking.</p> <p>(12) CONTRACTOR means any person who has a contractual arrangement to conduct an active operation for another person.</p> <p>(13) DAIRY FARM is an operation on a property, or set of properties that are contiguous or separated only by a public right-of-way, that raises cows or Rule 403 (cont.) (Amended June 3, 2005) 403 – 3 produces milk from cows for the purpose of making a profit or for a livelihood. Heifer and calf farms are dairy farms.</p> <p>(14) DISTURBED SURFACE AREA means a portion of the earth's surface which has been physically moved, uncovered, destabilized, or otherwise modified from its undisturbed natural soil condition, thereby increasing the potential for emission of fugitive dust. This definition excludes those areas which have: (A) been restored to a natural state, such that the vegetative ground cover and soil characteristics are similar to adjacent or nearby natural conditions; (B) been paved or otherwise covered by a permanent structure; or (C) sustained a vegetative ground cover of at least 70 percent of the native cover for a particular area for at least 30 days.</p> <p>(15) DUST SUPPRESSANTS are water, hygroscopic materials, or non-toxic chemical stabilizers used as a treatment material to reduce fugitive dust emissions.</p> <p>(16) EARTH-MOVING ACTIVITIES means the use of any equipment for any activity where soil is being moved or uncovered, and shall include, but not be limited to the following: grading, earth cutting and filling operations, loading or unloading of dirt or bulk materials, adding to or removing from open storage</p>
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	<p>piles of bulk materials, landfill operations, weed abatement through disking, and soil mulching.</p> <p>(17) DUST CONTROL SUPERVISOR means a person with the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all Rule 403 requirements at an active operation.</p> <p>(18) FUGITIVE DUST means any solid particulate matter that becomes airborne, other than that emitted from an exhaust stack, directly or indirectly as a result of the activities of any person.</p> <p>(19) HIGH WIND CONDITIONS means that instantaneous wind speeds exceed 25 miles per hour.</p> <p>(20) INACTIVE DISTURBED SURFACE AREA means any disturbed surface area upon which active operations have not occurred or are not expected to occur for a period of 20 consecutive days.</p> <p>(21) LARGE OPERATIONS means any active operations on property which contains 50 or more acres of disturbed surface area; or any earth-moving operation with a daily earth-moving or throughput volume of 3,850 cubic Rule 403 (cont.) (Amended June 3, 2005) 403 – 4 meters (5,000 cubic yards) or more three times during the most recent 365-day period.</p> <p>(22) OPEN STORAGE PILE is any accumulation of bulk material, which is not fully enclosed, covered or chemically stabilized, and which attains a height of three feet or more and a total surface area of 150 or more square feet.</p> <p>(23) PARTICULATE MATTER means any material, except uncombined water, which exists in a finely divided form as a liquid or solid at standard conditions.</p> <p>(24) PAVED ROAD means a public or private improved street, highway, alley, public way, or easement that is covered by typical roadway materials, but excluding access roadways that connect a facility with a public paved roadway and are not open to through traffic. Public paved roads are those open to public access and that are owned by any federal, state, county, municipal or any other governmental or quasi-governmental agencies. Private paved roads are any paved roads not defined as public.</p> <p>(25) PM<sub>10</sub> means particulate matter with an aerodynamic diameter smaller than or equal to 10 microns as measured by the applicable State and Federal reference test methods.</p> <p>(26) PROPERTY LINE means the boundaries of an area in which either a person causing the emission or a person allowing the emission has the legal use or possession of the property. Where such property is divided into one or more sub-tenancies, the property line(s) shall refer to the boundaries dividing the areas of all sub-tenancies.</p> <p>(27) RULE 403 IMPLEMENTATION HANDBOOK means a guidance document that has been approved by the Governing Board on April 2, 2004 or hereafter approved by the Executive Officer and the U.S. EPA.</p> <p>(28) SERVICE ROADS are paved or unpaved roads that are used by one or more public agencies for inspection or maintenance of infrastructure and which are not typically used for construction-related activity.</p> <p>(29) SIMULTANEOUS SAMPLING means the operation of two PM<sub>10</sub> samplers in such a manner that one sampler is started within five minutes of the other, and each sampler is operated for a consecutive period which must be not less than 290 minutes and not more than 310 minutes. (30) SOUTH COAST AIR BASIN means the non-desert portions of Los Angeles, Riverside, and San Bernardino counties and all of Orange County as defined in California Code of Regulations, Title 17, Section 60104. The area is bounded on the west by the Pacific Ocean, on the north and east by the San Gabriel, San Bernardino, and</p>
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	<p>San Jacinto Mountains, and on the south by the San Diego county line.</p> <p>(31) STABILIZED SURFACE means any previously disturbed surface area or open storage pile which, through the application of dust suppressants, shows visual or other evidence of surface crusting and is resistant to wind-driven fugitive dust and is demonstrated to be stabilized. Stabilization can be demonstrated by one or more of the applicable test methods contained in the Rule 403 Implementation Handbook.</p> <p>(32) TRACK-OUT means any bulk material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that have been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions.</p> <p>(33) TYPICAL ROADWAY MATERIALS means concrete, asphaltic concrete, recycled asphalt, asphalt, or any other material of equivalent performance as determined by the Executive Officer, and the U.S. EPA.</p> <p>(34) UNPAVED ROADS means any unsealed or unpaved roads, equipment paths, or travel ways that are not covered by typical roadway materials. Public unpaved roads are any unpaved roadway owned by federal, state, county, municipal or other governmental or quasi-governmental agencies. Private unpaved roads are all other unpaved roadways not defined as public.</p> <p>(35) VISIBLE ROADWAY DUST means any sand, soil, dirt, or other solid particulate matter which is visible upon paved road surfaces and which can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions.</p> <p>(36) WIND-DRIVEN FUGITIVE DUST means visible emissions from any disturbed surface area which is generated by wind action alone.</p> <p>(37) WIND GUST is the maximum instantaneous wind speed as measured by an anemometer. (d) Requirements (1) No person shall cause or allow the emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area such that: Rule 403 (cont.) (Amended June 3, 2005) 403 – 6 (A) the dust remains visible in the atmosphere beyond the property line of the emission source; or (B) the dust emission exceeds 20 percent opacity (as determined by the appropriate test method included in the Rule 403 Implementation Handbook), if the dust emission is the result of movement of a motorized vehicle. (2) No person shall conduct active operations without utilizing the applicable best available control measures included in Table 1 of this Rule to minimize fugitive dust emissions from each fugitive dust source type within the active operation. (3) No person shall cause or allow PM<sub>10</sub> levels to exceed 50 micrograms per cubic meter when determined, by simultaneous sampling, as the difference between upwind and downwind samples collected on high-volume particulate matter samplers or other U.S. EPA-approved equivalent method for PM<sub>10</sub> monitoring. If sampling is conducted, samplers shall be: (A) Operated, maintained, and calibrated in accordance with 40 Code of Federal Regulations (CFR), Part 50, Appendix J, or appropriate U.S. EPA-published documents for U.S. EPA-approved equivalent method(s) for PM<sub>10</sub>. (B) Reasonably placed upwind and downwind of key activity areas and as close to the property line as feasible, such that other sources of fugitive dust between the sampler and the property line are minimized. (4) No person shall allow track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation. Notwithstanding the preceding, all track-out from an active operation shall be removed at the conclusion of each workday or evening shift. (5) No person shall conduct an active operation with a disturbed surface area of five or more acres, or with a daily import or export of 100 cubic yards or</p>
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	<p>more of bulk material without utilizing at least one of the measures listed in subparagraphs (d)(5)(A) through (d)(5)(E) at each vehicle egress from the site to a paved public road. (A) Install a pad consisting of washed gravel (minimum-size: one inch) maintained in a clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long. Rule 403 (cont.) (Amended June 3, 2005) 403 – 7 (B) Pave the surface extending at least 100 feet and at least 20 feet wide. (C) Utilize a wheel shaker/wheel spreading device consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages before vehicles exit the site. (D) Install and utilize a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site. (E) Any other control measures approved by the Executive Officer and the U.S. EPA as equivalent to the actions specified in subparagraphs (d)(5)(A) through (d)(5)(D). (6) Beginning January 1, 2006, any person who operates or authorizes the operation of a confined animal facility subject to this Rule shall implement the applicable conservation management practices specified in Table 4 of this Rule. (e) Additional Requirements for Large Operations (1) Any person who conducts or authorizes the conducting of a large operation subject to this Rule shall implement the applicable actions specified in Table 2 of this Rule at all times and shall implement the applicable actions specified in Table 3 of this Rule when the applicable performance standards cannot be met through use of Table 2 actions; and shall: (A) submit a fully executed Large Operation Notification (Form 403N) to the Executive Officer within 7 days of qualifying as a large operation; (B) include, as part of the notification, the name(s), address(es), and phone number(s) of the person(s) responsible for the submittal, and a description of the operation(s), including a map depicting the location of the site; (C) maintain daily records to document the specific dust control actions taken, maintain such records for a period of not less than three years; and make such records available to the Executive Officer upon request; (D) install and maintain project signage with project contact signage that meets the minimum standards of the Rule 403 Implementation Handbook, prior to initiating any earthmoving activities; (E) identify a dust control supervisor that: (i) is employed by or contracted with the property owner or developer; (ii) is on the site or available on-site within 30 minutes during working hours; (iii) has the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all Rule requirements; (iv) has completed the AQMD Fugitive Dust Control Class and has been issued a valid Certificate of Completion for the class; and (F) notify the Executive Officer in writing within 30 days after the site no longer qualifies as a large operation as defined by paragraph (c)(18). (2) Any Large Operation Notification submitted to the Executive Officer or AQMD-approved dust control plan shall be valid for a period of one year from the date of written acceptance by the Executive Officer. Any Large Operation Notification accepted pursuant to paragraph (e)(1), excluding those submitted by aggregate-related plants and cement manufacturing facilities must be resubmitted annually by the person who conducts or authorizes the conducting of a large operation, at least 30 days prior to the expiration date, or the submittal shall no longer be valid as of the expiration date. If all fugitive dust sources and corresponding control measures or special circumstances remain identical to those identified in the previously accepted submittal or in an AQMD-approved dust control plan, the resubmittal may be a simple statement of no-change (Form 403NC). (f) Compliance Schedule The newly amended provisions of this Rule shall become</p>
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	<p>effective upon adoption. Pursuant to subdivision (e), any existing site that qualifies as a large operation will have 60 days from the date of Rule adoption to comply with the notification and recordkeeping requirements for large operations. Any Large Operation Rule 403 (cont.) (Amended June 3, 2005) 403 – 9 Notification or AQMD-approved dust control plan which has been accepted prior to the date of adoption of these amendments shall remain in effect and the Large Operation Notification or AQMD-approved dust control plan annual resubmittal date shall be one year from adoption of this Rule amendment. (g) Exemptions (1) The provisions of this Rule shall not apply to: (A) Dairy farms. (B) Confined animal facilities provided that the combined disturbed surface area within one continuous property line is one acre or less. (C) Agricultural vegetative crop operations provided that the combined disturbed surface area within one continuous property line and not separated by a paved public road is 10 acres or less. (D) Agricultural vegetative crop operations within the South Coast Air Basin, whose combined disturbed surface area includes more than 10 acres provided that the person responsible for such operations: (i) voluntarily implements the conservation management practices contained in the Rule 403 Agricultural Handbook; (ii) completes and maintains the self-monitoring form documenting sufficient conservation management practices, as described in the Rule 403 Agricultural Handbook; and (iii) makes the completed self-monitoring form available to the Executive Officer upon request. (E) Agricultural vegetative crop operations outside the South Coast Air Basin whose combined disturbed surface area includes more than 10 acres provided that the person responsible for such operations: (i) voluntarily implements the conservation management practices contained in the Rule 403 Coachella Valley Agricultural Handbook; and (ii) completes and maintains the self-monitoring form documenting sufficient conservation management practices, as described in the Rule 403 Coachella Valley Agricultural Handbook; and (iii) makes the completed self-monitoring form available to the Executive Officer upon request. Rule 403 (cont.) (Amended June 3, 2005) 403 – 10 (F) Active operations conducted during emergency life-threatening situations, or in conjunction with any officially declared disaster or state of emergency. (G) Active operations conducted by essential service utilities to provide electricity, natural gas, telephone, water and sewer during periods of service outages and emergency disruptions. (H) Any contractor subsequent to the time the contract ends, provided that such contractor implemented the required control measures during the contractual period. (I) Any grading contractor, for a phase of active operations, subsequent to the contractual completion of that phase of earth-moving activities, provided that the required control measures have been implemented during the entire phase of earth-moving activities, through and including five days after the final grading inspection. (J) Weed abatement operations ordered by a county agricultural commissioner or any state, county, or municipal fire department, provided that: (i) mowing, cutting or other similar process is used which maintains weed stubble at least three inches above the soil; and (ii) any discing or similar operation which cuts into and disturbs the soil, where watering is used prior to initiation of these activities, and a determination is made by the agency issuing the weed abatement order that, due to fire hazard conditions, rocks, or other physical obstructions, it is not practical to meet the conditions specified in clause (g)(1)(H)(i). The provisions this clause shall not exempt the owner of any property from stabilizing, in accordance with paragraph (d)(2), disturbed surface areas which have been created as a result of the weed abatement actions. (K) sandblasting operations.</p>
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	<p>(2) The provisions of paragraphs (d)(1) and (d)(3) shall not apply: (A) When wind gusts exceed 25 miles per hour, provided that: Rule 403 (cont.) (Amended June 3, 2005) 403 – 11 (i) The required Table 3 contingency measures in this Rule are implemented for each applicable fugitive dust source type, and; (ii) records are maintained in accordance with subparagraph (e)(1)(C). (B) To unpaved roads, provided such roads: (i) are used solely for the maintenance of wind-generating equipment; or (ii) are unpaved public alleys as defined in Rule 1186; or (iii) are service roads that meet all of the following criteria: (a) are less than 50 feet in width at all points along the road; (b) are within 25 feet of the property line; and (c) have a traffic volume less than 20 vehicle-trips per day. (C) To any active operation, open storage pile, or disturbed surface area for which necessary fugitive dust preventive or mitigative actions are in conflict with the federal Endangered Species Act, as determined in writing by the State or federal agency responsible for making such determinations. (3) The provisions of (d)(2) shall not apply to any aggregate-related plant or cement manufacturing facility that implements the applicable actions specified in Table 2 of this Rule at all times and shall implement the applicable actions specified in Table 3 of this Rule when the applicable performance standards of paragraphs (d)(1) and (d)(3) cannot be met through use of Table 2 actions. (4) The provisions of paragraphs (d)(1) , (d)(2), and (d)(3) shall not apply to: (A) Blasting operations which have been permitted by the California Division of Industrial Safety; and (B) Motion picture, television, and video production activities when dust emissions are required for visual effects. In order to obtain this exemption, the Executive Officer must receive notification in writing at least 72 hours in advance of any such activity and no nuisance results from such activity. (5) The provisions of paragraph (d)(3) shall not apply if the dust control actions, as specified in Table 2, are implemented on a routine basis for Rule 403 (cont.) (Amended June 3, 2005) 403 – 12 each applicable fugitive dust source type. To qualify for this exemption, a person must maintain records in accordance with subparagraph (e)(1)(C). (6) The provisions of paragraph (d)(4) shall not apply to earth coverings of public paved roadways where such coverings are approved by a local government agency for the protection of the roadway, and where such coverings are used as roadway crossings for haul vehicles provided that such roadway is closed to through traffic and visible roadway dust is removed within one day following the cessation of activities. (7) The provisions of subdivision (e) shall not apply to: (A) officially-designated public parks and recreational areas, including national parks, national monuments, national forests, state parks, state recreational areas, and county regional parks. (B) any large operation which is required to submit a dust control plan to any city or county government which has adopted a District-approved dust control ordinance. (C) any large operation subject to Rule 1158, which has an approved dust control plan pursuant to Rule 1158, provided that all sources of fugitive dust are included in the Rule 1158 plan. (8) The provisions of subparagraph (e)(1)(A) through (e)(1)(C) shall not apply to any large operation with an AQMD-approved fugitive dust control plan provided that there is no change to the sources and controls as identified in the AQMD-approved fugitive dust control plan. (h) Fees Any person conducting active operations for which the Executive Officer conducts upwind/downwind monitoring for PM<sub>10</sub> pursuant to paragraph (d)(3) shall be assessed applicable Ambient Air Analysis Fees pursuant to Rule 304.1. Applicable fees shall be waived for any facility which is exempted from paragraph (d)(3) or meets the requirements of paragraph (d)(3).</p>
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	<p>a. Please clarify the procedures, equipment, and all actions the CCL will be taking to mitigate all fugitive dust emissions.</p> <p>b. Please clarify all many-made conditions capable of generating fugitive dust.</p> <p>C-1: Please clarify all operations capable of generating fugitive dust, including, but not limited to, earth-moving activities, construction/demolition activities, disturbed surface area, or heavy-and-duty vehicular movement.</p> <p>C-5. Please include all Anemometers to measure wind speed and direction. Please clarify the steps that will be taken in order to control any dust or odor from leaving CCL.</p> <p>C-8: Please provide a list of all non-toxic chemical dust suppressants to be used at CCL. Please provide how each chemical stabilizer will meet the specification, criteria, or tests required by any federal, state, or local water agency.</p> <p>C-11. Please clarify and list all on-site mechanical activities conducted in preparation of, or related to, the building, alteration, rehabilitation, demolition or improvement of property, including, but not limited to the following activities: grading, excavation, loading, crushing, cutting, planning, shaping or ground breaking.</p> <p>C-14: Please clarify and list best available procedures and equipment that will be to limit the used increasing</p> <p>C-15: Please clarify and list all water, hygroscopic materials, or non-toxic chemical stabilizers used as a treatment material to reduce fugitive dust emissions. The potential for emission of fugitive dust.</p> <p>C-16: Please clarify and list all EARTH-MOVING ACTIVITIES means the use of any equipment for any activity where soil is being moved or uncovered, and shall include, but not be limited to the following: grading, earth cutting and filling operations, loading or unloading of dirt or bulk materials, adding to or removing from open storage piles of bulk materials, landfill operations, weed abatement through disking, and soil mulching.</p> <p>C-17: Please clarify and list the on-site Dust Control Supervisor and the hours/days that each Supervisor will be working and the steps each Supervisor will be taking to ensure compliance with all Rule 403 requirements at CCL.</p> <p>C-18. Please list all particulate matter that might become airborne and that might result from direct or indirect activities of any person. Please clarify and list how each individual/person will be required to limit the possibility of dust becoming airborne.</p> <p>C-19: Please clarify and list the steps and procedures that will be taken to ensure that fugitive dust remains at CCL during high wind conditions.</p> <p>C-21: Please clarify all large operations that are expected to occur at CCL and the steps and procedures to control fugitive dust during these huge operations.</p> <p>C-22: Please clarify the steps and procedures to deal with Open Storage Piles in order to mitigate the fugitive dust.</p> <p>C-23. Please clarify and list all Particulate Matter that will be present at CCL and the steps and procedures that will be used to maintain/remove the Particulate Matter.</p> <p>C-25. Please list all steps and procedures to limit PM<sub>10</sub> to the confines of the property line of CCL.</p>
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11.4.3.2	Prohibitory Rules (Regulation IV)	<p>403.1 Monitoring requirements. Continued</p> <p><b>(1). Please list all gaseous fuels other than natural gas that is burned on site at CCL. Please list and include sulfur content for the past 5 years.</b></p> <p><b>(A) Please list where the CFGMS were installed on the grounds of CCL.</b></p> <p><b>(B). Please list all Permits to Construct issued by the District for a sulfur removal system.</b></p> <p><b>(C). Please list if CCL has always been in compliance with sulfur limits. If not then please give the levels and dates that CCL was out of compliance.</b></p> <p><b>(2) Please provide evidence a quality assurance procedure as specified in U.S. EPA 40 CFR, part 60, Appendix F, Procedure 1 for CEMS and for CFGMS.</b></p> <p><b>(B). Please provide documentation of any CFGMS or CEMS that have been deemed out of control in the last 5 years.</b></p> <p><b>(B)(i) Please provide list any breakdowns of the monitoring systems when the duration of the breakdown was in excess of 60 minutes or there was three or more break downs in a day.</b></p> <p><b>(B(ii). Please list alternative monitoring methods in lieu of the requirements in paragraphs (d)(1) and (d)(2).</b></p> <p><b>(e) Reporting and Recordkeeping Requirements.</b></p>

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		<p><b>(2) Please provide evidence that CCL has been in compliance for (e)(1)(2)(3)(4).</b></p> <p>Attachment A: Section 1 (CFGMS)  <b>Please provide documentation that CCL is in compliance with all requirements (1)(2)(3)(4)(5)(6).</b></p> <p>Attachment A. Section II (CEMS)  <b>Please provide documentation that CCL is in compliance with all requirements (1)(2)(3)(4)(5)(6)(7).</b></p> <p>Attachment A. Section III.  <b>Please clarify and list any and all alternative monitoring plans at CCL.</b></p>	49-26 cont'd
11.4.3.2	Prohibitory Rules (Regulation IV)	<p>RULE 405.  SOLID PARTICULATE MATTER-WEIGHT</p> <p>(a) A person shall not discharge into the atmosphere from any source, solid particulate matter including lead and lead compounds in excess of the rate shown in Table 405(a). Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation. The provisions of this subsection shall not apply to any equipment completed and put into service before July 1, 1976 in the Palo Verde and Joshua Tree areas.</p> <p>(b) A person shall not discharge into the atmosphere in any one hour from any source, solid particulate matter including lead and lead compounds in excess of 0.23 kilogram (0.5 pound) per 907 kilograms (2000 pounds) of process weight. For the purposes of this subsection only, process air shall be considered to be a material introduced into the process when calculating process weight. The provisions of this subsection shall apply only to equipment completed and put into service before July 1, 1976 in the Palo Verde and Joshua Tree areas.</p> <p>(c) For the purposes of this rule, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.</p> <p>(d) The provisions of this rule shall not apply to the use of equipment which complies with the emission limits specified in Rule 1112.1.</p> <p><b>Please clarify how much solid particulate matter including lead and lead compounds are discharged into the air now. Please inform if the compounds have ever exceeded the rates shown in the table. Please clarify the steps and procedures for when rates are exceeded in table 405(a). Please list the equipment which complies with the emission limits specified in Rule 1112.1. Please list any equipment not presently owned or operated by the landfill that complies with emission limits specified in Rule 1112.1.</b></p>	49-27
11.4.3.2	Prohibitory Rules (Regulation IV)	<p>RULE 404. PARTICULATE MATTER - CONCENTRATION</p> <p>(a) A person shall not discharge into the atmosphere from any source, particulate matter in excess of the concentration at standard conditions, shown in Table 404(a). Where the volume discharged is between figures listed in the Table, the exact concentration permitted to be discharged shall be determined by linear interpolation. The provisions of this subsection shall not apply to any equipment completed and put into service before July 1, 1976 in the Palo Verde and Joshua Tree areas. Before July 1, 1983, liquid sulfur compounds shall not be included as particulate matter discharged from petroleum coke calciners.</p> <p>(b) A person shall not discharge into the atmosphere from any source,</p>	49-28

		<p>particulate matter in excess of 450 milligrams per cubic meter (0.196 grain per cubic foot) in discharged gas calculated as dry gas at standard conditions. The provisions of this subsection shall apply only to any equipment completed and put into service before July 1, 1976 in the Palo Verde and Joshua Tree areas.</p> <p>(c) The provisions of this rule shall not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines.</p> <p>(d) For the purposes of this rule, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.</p> <p>(e) The provisions of this rule shall not apply to the use of equipment which complies with the emission limits specified in Rule 1112.1.</p> <p><b>Please clarify what equipment is used to measure the particulate matter, the year the equipment was manufactured and when the equipment was purchased and placed into operation.</b></p> <p><b>Please clarify when these emissions are monitored by providing the times of the day the readings are taken and the days of the week those readings are taken.</b></p>	49-28 cont'd
11.4.3.2	Prohibitory Rules (Regulation IV)	<p><b>RULE 407. LIQUID AND GASEOUS AIR CONTAMINANTS</b></p> <p>(a) A person shall not discharge into the atmosphere from any equipment:</p> <p>(1) Carbon monoxide (CO) exceeding 2,000 ppm by volume measured on a dry basis, averaged over 15 consecutive minutes.</p> <p>(2) Sulfur compounds which would exist as liquid or gas at standard conditions, calculated as sulfur dioxide (SO<sub>2</sub>) and averaged over 15 consecutive minutes, exceeding:</p> <p>(A) In the South Coast Air Basin, 500 ppm by volume, effective July 1, 1982.</p> <p>(B) In the Southeast Desert Air Basin portion of Riverside County: (i) 500 ppm by volume for equipment which is issued a permit to construct or permit to operate after July 1, 1982. (ii) 1,500 ppm by volume until January 1, 1984, and 500ppm by volume thereafter for equipment that has been issued a permit to construct or permit to operate prior to July 1, 1982.</p> <p>(b) The provisions of this rule shall not apply to emissions from: (1) Stationary internal combustion engines. (2) Propulsion of mobile equipment. (3) Emergency venting due to equipment failure or process upset.</p> <p>(c) The provisions of subsection (a) (2) of this rule shall not apply to: (1) Equipment which is subject to the emission limits and requirements of source specific rules in Regulation XI. (2) Equipment which complies with the gaseous fuel sulfur content limits of Rule 431.1</p> <p><b>Please clarify and provide list of steps and procedures along with machinery and equipment that measures the Carbon Monoxide (CO), Sulfur compounds (SO<sub>2</sub>). Please include the liquid and gas at standard conditions. Please provide procedures when they are not at standard conditions.</b></p>	49-29
11.4.3.2	Prohibitory Rules (Regulation IV)	<p>408-1 (Adopted May 7, 1976)</p> <p><b>RULE 408. CIRCUMVENTION</b></p> <p>A person shall not build, erect, install, or use any equipment, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Chapter 3 (commencing with Section 41700) of Part 4, of Division 26 of the Health and Safety Code or of these rules. This rule shall not apply to cases in which the only violation involved is of Section 48700 of the</p>	49-30

		Health and Safety Code, or Rule 402 of these Rules  <b>Please clarify if any violations of Rule 408 have ever been cited by any government agency. Please provide citation and procedures followed to remedy the citation.</b>	49-30 cont'd
11.4.3.2	Prohibitory Rules (Regulation IV)	409-1 (Adopted May 7, 1976)(Amended August 7, 1981) RULE 409. COMBUSTION CONTAMINANTS A person shall not discharge into the atmosphere from the burning of fuel, combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO <sub>2</sub> ) at standard conditions averaged over a minimum of 15 consecutive minutes. The provisions of this rule shall not apply to jet engine test stands and emissions from internal combustion engines.  <b>Please provide list of all fuel, and combustion contaminants that could be discharged into the air. Please provide steps and procedures that CCL uses to ensure that no discharge into the atmosphere occurs from the burning of fuel, combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO<sub>2</sub>) at standard conditions averaged over a minimum of 15 consecutive minutes.</b>	49-31
11.4.3.2	Prohibitory Rules (Regulation IV)	RULE 430. BREAKDOWN PROVISIONS (a) Applicability This rule applies to any breakdown which results in a violation of any rule or permit condition not specified in subparagraph (b)(3)(B). Malfunctions of continuous emissions monitoring system (CEMS), continuous fuel gas monitoring system (CFGMS), or other equivalent monitoring system, subject to Rules 218, 431.1, and 1135 shall not be considered as a breakdown for the purpose of this rule. (b) Requirements (1) A person shall report by telephone or other District - approved method, any breakdown which results in a violation of any rule or permit condition not specified in subparagraph (b)(3)(B) to the Executive Officer within one hour of such breakdown or within one hour of the time said person knew or reasonably should have known of its occurrence. Such report shall identify the time, specific location, equipment involved, responsible party to contact for further information, and to the extent known, the causes of the breakdown, and the estimated time for repairs. In the case of emergencies that prevent a person from reporting all required information within the one - hour limit, the Executive Officer may extend the time for the reporting of required information provided such person has notified the Executive Officer of the breakdown within the one - hour limit. (2) Within seven calendar days after a reported breakdown has been corrected, but no later than thirty calendar days from the initial date of the breakdown, unless an extension has been approved in writing by the Executive Officer, the owner or operator shall submit a written Breakdown Emissions Report to the Executive Officer which includes: (A) an identification of the equipment involved in causing, or suspected of having caused, or having been affected by the breakdown; (B) the duration of the breakdown; (C) the date of correction and information demonstrating that compliance is	49-32

	<p>achieved; Rule 430 (Cont.) (Amended July 12, 1996) 430-2</p> <p>(D) an identification of the types of emissions, if any, resulting from the breakdown;</p> <p>(E) a quantification of the excess emissions, if any, resulting from the breakdown and the basis used to quantify the emissions;</p> <p>(F) information substantiating that the breakdown did not result from operator error, neglect or improper operation or maintenance procedures;</p> <p>(G) information substantiating that steps were immediately taken to correct the condition causing the breakdown, and to minimize the emissions, if any, resulting from the breakdown;</p> <p>(H) a description of the corrective measures undertaken and/or to be undertaken to avoid such a breakdown in the future; and</p> <p>(I) pictures of the equipment which failed, if available.</p> <p>(3) Compliance During Breakdown (A) Any rule or permit condition not specified in subparagraph (b)(3)(B) shall be inapplicable to a violation directly caused by a breakdown, provided that all of the following criteria are met:</p> <p>(i) the owner or operator meets the reporting requirements specified in paragraph (b)(1) and (b)(2);</p> <p>(ii) the breakdown did not result from operator error, neglect, or improper operation or maintenance procedures;</p> <p>(iii) steps are immediately taken to correct conditions leading to the breakdown, and emissions caused by the breakdown are mitigated to the maximum extent feasible; and</p> <p>(iv) the equipment in violation is shut down by the end of an operating cycle, or within twenty-four hours from the time the owner or operator knew or reasonably should have known of the breakdown, whichever is sooner. For the purpose of this rule, an operating cycle means a period of time within which a round of regularly recurring events is completed, and cannot be stopped without the risk of endangering public safety or health, causing material damage to the equipment or product, or cannot be stopped due to technical constraints. Economic reasons alone will not be sufficient to extend this time period. The operating cycle includes batch processes that may start and finish several times within a twenty-four hour period, in which case each start to finish interval is considered a complete cycle. (B) Subparagraph (b)(3)(A) shall not apply to the following District Regulations, Rules and permit conditions: (i) Regulations I, IX, X, XIV, XVII, XX, XXX, and XXXI; (ii) Rules 218, and 402; (iii) any permit condition which implements any Rule or Regulation specified in clause (i) or (ii). (c) If a violation of any rule or permit condition not specified in subparagraph(b)(3)(B) is likely or suspected as a result of a reported breakdown, the Executive Officer will promptly investigate and determine whether the occurrence constitutes a breakdown in accordance with the criteria set forth in subparagraph (b)(3)(A) of this rule. If the Executive Officer determines that the occurrence did not constitute a breakdown, no relief shall be granted under subparagraph (b)(3)(A). (d) Equipment may be operated beyond the time limit in clause (b)(3)(A)(iv), provided that a petition for an emergency variance has been filed with the Clerk of the Hearing Board in accordance with Regulation V. In the event that the breakdown occurs or the time limit in clause (b)(3)(A)(iv) ends outside of the normal District working hours, the intent to file for an emergency variance shall be transmitted to the District in the manner and form prescribed by the Executive Officer.</p> <p><b>Please clarify and provide the persons that would be responsible for</b></p>
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		<p><b>reporting such breakdowns. (D). Please list all possible equipment that could break down and the possible emissions that would escape during a breakdown of any equipment. Please clarify if and what time frame the immediate public would be notified of any breakdown that could cause the escape of particulate matter into the surrounding neighborhoods, and school grounds.</b></p> <p><b>Please clarify the procedures for immediate evacuation of CCL grounds and the communities that surround the landfill in the event that a breakdown would cause substantial dangers to any resident within a 3 mile radius. Please clarify emergency procedures in the event that a breakdown can be contained and emergency procedures when it cannot be contained.</b></p>	49-32 cont'd
11.4.3.2	Prohibitory Rules (Regulation IV)	<p><b>RULE 431.1. SULFUR CONTENT OF GASEOUS FUELS</b></p> <p>(a) Purpose The purpose of this rule is to reduce sulfur oxides (SOx) emissions from the burning of gaseous fuels in stationary equipment requiring a permit to operate by the South Coast Air Quality Management District (District).</p> <p>(b) Definitions</p> <p>(1) BURN means to combust any gaseous fuel, whether for useful heat or by incineration without heat recovery, except for flaring of emergency vent gases.</p> <p>(2) CONTINUOUS EMISSION MONITORING SYSTEM (CEMS) means a system of equipment that continuously measures and records all parameters necessary to directly determine concentrations or mass emissions of selected pollutants, and which meets all of the requirements of Attachment A, Section II.</p> <p>(3) CONTINUOUS FUEL GAS MONITORING SYSTEM (CFGMS) means a system of equipment that continuously measures and records total sulfur concentration in the gaseous fuel prior to burning, and which meets all the requirements of Attachment A, Section I.</p> <p>(4) CONTINUOUS MONITOR means a CEMS or CFGMS.</p> <p>(5) DAILY AVERAGE means an arithmetic mean of all of a facility's sulfur compounds readings within a calendar day obtained according to the guideline specified in Attachment A.</p> <p>(6) EMERGENCY VENT GAS means any gas released from a process unit as a result of any process upset or breakdown.</p> <p>(7) GASEOUS FUEL means any gaseous material which releases heat when burned including, but not limited to, any natural, refinery, field produced, process, synthetic, landfill, sewage digester, or waste gases with a gross heating value of 2670 kilocalories per cubic meter (300 BTU per cubic foot) or higher, at standard conditions.</p> <p>(8) LANDFILL GAS means any gas derived through any biological process from the decomposition of organic waste buried within a waste disposal site.</p> <p>(9) MONTHLY WEIGHTED AVERAGE SULFUR CONTENT means the result of the summation of average daily sulfur contents of the fuel(s) consumed multiplied by the average daily consumption rates of the fuel(s) consumed in any month divided by the total gaseous fuel consumption rate for that month.</p> <p>(10) NATURAL GAS means a mixture of gaseous hydrocarbons, with at least 80 percent methane (by volume), and of pipeline quality, such as the gas sold or distributed by any utility company regulated by the California Public Utilities Commission.</p> <p>(11) RECLAIM SOx FACILITY means a facility that has been included in the RECLAIM (Regional Clean Air Incentives Market) program in accordance with the requirements of Rule 2001 "Applicability," and/or which has been issued a</p>	49-33

	<p>RECLAIM Facility Permit and is subject to the requirements of Rule 2011, "Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Sulfur (SO<sub>x</sub>) Emissions."</p> <p>(12) REFINERY GAS means any combustible gaseous by - product generated from a petroleum refinery process unit operation, with a gross heating value of 2670 kilocalories per cubic meter (300 BTU per cubic foot) or higher, at standard conditions.</p> <p>(13) SEWAGE DIGESTER GAS means any gas derived from anaerobic decomposition of organic sewage within its containment.</p> <p>(14) SMALL REFINER means any person owning or operating a facility in California that produces materials from the processing of crude oil provided such facility:</p> <p>(A) has and at all times had since January 1, 1978, a crude oil capacity of not more than 55,000 barrels per stream day; and</p> <p>(B) has not been, at any time since September 1, 1988, owned or controlled by any refiner that at the same time owned or controlled refineries in California with a total combined crude oil capacity of more than 55,000 barrels per stream day; and</p> <p>(C) has not been at any time since September 1, 1988, owned or controlled by any refiner that at the same time owned or controlled refineries in the United States with a total combined crude oil capacity of more than 137,500 barrels per stream day; and</p> <p>(D) has received a two - year extension for compliance with California Air Resources Board's Phase II Reformulated Gasoline Requirements.</p> <p>(15) STANDARD CONDITIONS means the atmospheric state where the temperature is 60 of and barometric pressure is 14.7 pounds per square inch absolute.</p> <p>(16) STREAM DAY means any day or part of a day when a facility or a process unit is in operation.</p> <p>(c) Sulfur Content Requirements</p> <p>(1) Natural gas A person shall not transfer, sell or offer for sale for use in the jurisdiction of the District natural gas containing sulfur compounds calculated as H<sub>2</sub>S in excess of 16 parts per million by volume (ppmv).</p> <p>(2) Other Gaseous Fuels On or after the applicable compliance dates specified in Table 1, a person shall not burn in equipment requiring a Permit to Operate, purchase, transfer, sell or offer for sale for use in the jurisdiction of the District, any gaseous fuel containing sulfur compounds calculated as H<sub>2</sub>S, in excess of the concentration limits as measured over the averaging periods for various gaseous fuels as specified in Table 1.</p> <p>(3) Optional Facility Compliance Plan ("OFCP") A person may comply with paragraph (c)(2) by achieving equivalent sulfur oxides (SO<sub>x</sub>) emission reductions within the facility, provided that the applicant submits and complies with an Optional Facility Compliance Plan ("OFCP") which has been approved in writing by the Executive Officer. The OFCP shall: (A) Contain, at a minimum, all data, records, and other information necessary to determine eligibility for alternative emission control, including but not limited to:</p> <p>(i) A list of equipment and a description of the equipment where the gaseous fuel is being produced and/or burned;</p> <p>(ii) The amount of fuel produced by and/or to be burned in each piece of equipment listed in clause (c)(3)(A)(i);</p>
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	<p>(iii) The estimated emissions of sulfur dioxide from each piece of equipment; and</p> <p>(iv) Historical and projected information on fuel usage; (B) Demonstrate that daily total SOx emissions under the OFCP from all sources within the facility regulated under Rule 431.1 would be less than or equal to SOx emissions that would have been emitted based on actual total SOx emissions from each source, or the sulfur content limits of this rule, whichever results in lower SOx emissions. The total SOx emissions generated from the subject fuel shall be determined using a continuous emission monitoring system (CEMS) specified in subdivision (d). The total emissions may be determined by monitoring the sulfur dioxide emissions from at least 70 percent of the total fuel gas consumed as obtained from a totalizing meter, and calculating the total emissions using the CEMS data; (C) Demonstrate that the permit units subject to the specified rule emission limitations are in compliance with all applicable District rules or are on an approved schedule of compliance; and (D) Demonstrate compliance with the continuous monitoring requirements as specified in subdivision (d) of this rule.</p> <p>(4) Previously Exempt or Previously Compliant Facilities  A person burning gaseous fuel containing sulfur compounds in excess of the limits specified in Table 1 and whose facility had been previously exempt from this rule pursuant to paragraph (g)(8); or any person who, without the use of any sulfur removal or control system, had been previously in compliance with the limits specified in Table 1, shall:</p> <p>(A) Submit for approval by the Executive Officer within 30 days from the time of exceedance or non-compliance, a plan to demonstrate compliance with the requirements of the rule;</p> <p>(B) Submit to the Executive Officer an application for a fuel gas control system within six months of the time of exceedance of the exemption criteria specified in paragraph (g)(8), or non-compliance with the limit;</p> <p>(C) Demonstrate compliance with the limit specified in Table 1 no later than eighteen (18) months after the time of exceedance; and</p> <p>(D) Comply with paragraphs (d)(1) and (d)(2), or (d)(3). (d) Monitoring Requirements (1) Except as provided in paragraph (d)(3), a person burning gaseous fuels, other than exclusively natural gas, in stationary equipment requiring a Permit to Operate by the District shall have a properly operating continuous fuel gas monitoring system (CFGMS) to determine the sulfur content, calculated as H<sub>2</sub>S, of the fuel gas prior to burning; or a continuous emission monitoring system (CEMS) to determine SOx emissions after burning. All continuous monitors require District approval, which shall be based on the requirements as specified in Attachment A.</p> <p>(A) A person shall install the CFGMS upstream of any mixing of refinery gases with natural gas, propane or other fuels.</p> <p>(B) A person subject to paragraph (c)(4) of this rule shall comply with paragraphs (d)(1) and (d)(2) no later than twelve months after the date a Permit to Construct is issued by the District for a sulfur removal system or comply with paragraph (d)(3).</p> <p>(C) Compliance with the Table 1 sulfur limits shall be determined based on readings obtained from an approved continuous monitor.</p> <p>(2) A person installing a continuous monitor shall submit to the District for approval, a quality assurance procedure as specified in U.S. EPA 40 CFR, Part 60, Appendix F, Procedure 1 for CEMS and, as applicable, for CFGMS.</p> <p>(A) The quality assurance procedure specified above shall be submitted to the</p>
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	<p>District for written approval by the Executive Officer prior to the CFGMS or CEMS final certification.</p> <p>(B) Any CFGMS or CEMS deemed to be out of control, as specified in Attachment A, according to the facility quality assurance procedure approved by the Executive Officer shall be corrected within 72 hours.</p> <p>(i) The person operating the CFGMS or CEMS shall notify the Executive Officer by telephone or facsimile of any breakdown(s) of the monitoring systems if the duration of the breakdown is in excess of 60 minutes or if there are three or more breakdowns in any one day within 24 hours of the occurrence of the breakdown which triggers notification. Such report shall identify the time, location, equipment involved, and contact person.</p> <p>(ii) The person who complies with the provisions of clause (d)(2)(B)(i) and paragraph (e)(3) shall not be considered in violation of this rule for the 72 hour period of breakdown provided that the breakdown did not result from operator error, neglect or improper operation or maintenance procedures.</p> <p>(3) A person burning landfill gas or sewage digester gas, or who is subject to paragraph (c)(4) of this rule may use an alternative monitoring method, in lieu of the requirements in paragraphs (d)(1) and (d)(2), that ensures compliance with the daily total sulfur content limitation as specified in Table 1. Alternative monitoring methods shall not be used unless first approved in writing by the Executive Officers of the District, the California Air Resources Board (CARB), and the Regional Administrator of the Environmental Protection Agency (EPA), Region IX, or their designees.</p> <p>(A) At a minimum, the alternative monitoring method shall meet the guidelines of Attachment A, Section III.</p> <p>(B) A person subject to (c)(4) of this rule shall submit an alternative monitoring method for approval no later than 45 days after the date a Permit to Construct a sulfur removal system is issued.</p> <p>(C) All monitoring must comply with the approved alternative monitoring method.</p> <p>(D) District personnel shall use the approved alternative monitoring method to determine compliance with the limits of this rule. (e) Reporting and Recordkeeping Requirements</p> <p>(1) All records required by this rule shall be maintained at the facility for at least two years, and be made available to District staff upon request.</p> <p>(2) Except at electric utility generating facilities and refineries, a person burning gaseous fuel, other than exclusively natural gas, in stationary equipment requiring a District Permit to Operate, shall submit to the Executive Officer annual reports of the monthly fuel consumption and the total sulfur content of the fuel consumed. The annual report shall be submitted no later than 60 days following the end of the reporting year, and shall consist of the amount of any gaseous fuel consumed monthly, the applicable hourly, daily or monthly average sulfur content as determined by the continuous monitor or approved alternative monitoring method as specified in paragraphs (d)(1), (d)(2), or (d)(3) of this rule, and total SO<sub>x</sub> emissions calculated as SO<sub>2</sub>.</p> <p>(3) A person burning gaseous fuel in stationary equipment located at electric utility generating facilities or refineries shall submit to the Executive Officer monthly reports of the daily fuel consumption, the monthly weighted average sulfur content (except for natural gas), and the maximum 4 – hour average sulfur content of the fuel consumed, as determined by the device specified in</p>
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	<p>paragraph (d)(1) of this rule and the total SOx emissions calculated as SO<sub>2</sub>. The report shall be submitted no later than 30 days following the end of the reporting month.</p> <p>(4) The person operating a continuous monitor shall keep records as specified in clause (d)(2)(B)(i) for monitor breakdown(s).</p> <p>(f) Test Methods The following shall be used by the Executive Officer to verify compliance with the provisions of this rule:</p> <p>(1) For determination of compliance with sulfur content requirements of subdivision (c):</p> <p>(A) The reference method for determining the concentration of sulfur compounds in a gaseous fuel, calculated as H<sub>2</sub>S, shall be District Method 307-91- Determination of Sulfur in a Gaseous Matrix, or any other method demonstrated by the applicant to be equivalent and approved in writing by the Executive Officers of the District, the CARB, and the Regional Administrator of the EPA, Region IX, or their designees, or</p> <p>(B) Data obtained from a continuous monitor, which is required to be installed and properly operated according to subdivision (d) and as approved by the Executive Officer pursuant to the guidelines specified in Attachment A, or</p> <p>(C) The results obtained using the approved alternative monitoring method as specified in (d)(3).</p> <p>(2) The gross heating value of gaseous fuels shall be determined by ASTM Method D 3588-91 or, if applicable, ASTM Method D 4891-89.</p> <p>(3) The methane content of gaseous fuels shall be determined by ASTM Method D1945-81.</p> <p>(g) Exemptions Unless otherwise specified, and provided that the person seeking the exemption supplies proof and verification upon request of applicable criteria to the satisfaction of the Executive Officer, the provisions of this rule shall not apply to the following:</p> <p>(1) A person selling, for use in the jurisdiction of the District, any gaseous fuel not complying with paragraphs (c)(1) and (c)(2) provided that:</p> <p>(A) The gaseous fuel is delivered directly to a sulfur removal unit which is in full operation and which reduces the sulfur content to the limits specified in paragraphs (c)(1) and (c)(2); and</p> <p>(B) The seller notifies the Executive Officer prior to any such sale of the quantity, heating value, and composition of the gaseous fuel to be sold; and</p> <p>(C) The buyer has an approved Permit to Construct and/or Operate for the sulfur removal unit that will be used to treat the purchased gas.</p> <p>(2) Gaseous fuels containing sulfur used in the production of sulfur or sulfur compounds.</p> <p>(3) Waste gases being burned provided that: (A) The gross heating value of such gases is less than 2670 kilocalories per cubic meter (300 British Thermal Units per cubic foot) at standard conditions; and</p> <p>(B) Any supplemental fuel used to burn such waste gases does not contain sulfur or sulfur compounds in excess of the amount specified in this rule.</p> <p>(4) Gases being burned from fluidized catalytic cracking unit (FCCU) regenerators subject to District Rule 1105 or Regulation XX.</p> <p>(5) Gases vented during refinery turnaround pursuant to District Rule 1123 or Regulation XX.</p> <p>(6) Gases vented to a control system pursuant to District Rule 466 and 1173 or Regulation XX.</p> <p>(7) Gases vented intermittently to fuel gas or waste disposal system from</p>
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		<p>pressure control valves, sight glasses, compressor bottles, sampling systems, and pump and compressor case vents.</p> <p>(8) Any facility which emits less than 5 pounds per day total sulfur compounds, calculated as H<sub>2</sub>S, from the burning of gaseous fuels other than natural gas. Emissions of total sulfur compounds shall be measured based on fuel analysis, using the test method specified in paragraph (g)(1), and the maximum daily gaseous fuel consumption. This exemption shall not apply to the requirement of paragraph (c)(1).</p> <p>(9) A person is exempt from the requirements of paragraphs (d)(1) and (d)(2) if the person demonstrates to the satisfaction of the Executive Officer that the supplier of the gaseous fuel has complied with the requirements of subdivision (d) for such fuel.</p> <p>(10) Until December 31, 1998, a person burning LFG is exempt from the requirements of paragraph (d)(1) and (d)(2) provided that they determine and report the sulfur content of the fuel gas according to the approved Rule 1150.1 Compliance Plan for the landfill providing the LFG. If the person burning LFG elects to use an alternative monitoring method as specified in paragraph (d)(3), the plan or revision to the plan shall be submitted to the District by September 1, 1998 and the sulfur content of the fuel gas shall be determined and reported according to the approved Rule 1150.1 Compliance Plan for the landfill providing the LFG, until plan approval or disapproval.</p> <p>(11) On or after July 1, 1997, a person previously in compliance with the limits specified in Table 1 of this rule shall be exempt from the requirements of paragraph (c)(4) provided that: the alternative monitoring method pursuant to paragraph (d)(3) yields no more than three individual readings in a calendar year in excess of the limits specified in Table 1; that no single reading exceeds a fuel sulfur limit by 25 percent; and that the sampling frequency is no longer than once per week</p> <p style="text-align: center;">ATTACHMENT A SECTION I REQUIREMENTS FOR CONTINUOUS FUEL GAS MONITORING SYSTEM (CFGMS)</p> <p>A continuous fuel gas monitor used for determining the sulfur content of any gaseous fuel shall:</p> <p>(1) Continuously monitor and record the concentration by volume (dry basis) of sulfur compounds in ppmv as H<sub>2</sub>S in the gaseous fuel.</p> <p>(2) Have the span value of the monitor set so that all readings fall between 20 and 95 percent of scale.</p> <p>(3) Check for calibration drift of the monitoring system at least once daily (approximately 24-hr interval) at two concentrations, one high level and one low level. Whenever the daily high level or low level calibration drift exceeds 5% of analyzer full scale span, the monitoring system shall be deemed to be out of control and subject to the requirements of subparagraph (d)(2)(B) of this rule.</p> <p>(4) Determine the relative accuracy of the monitor which shall be no greater than 20 percent of the mean value of the reference method test data.</p> <p>(5) Be able to record negative values of zero drift.</p> <p>(6) Report the concentration of the sulfur compounds calculated as H<sub>2</sub>S.</p> <p style="text-align: center;">SECTION II REQUIREMENTS FOR CONTINUOUS EMISSIONS MONITORING SYSTEMS (CEMS)</p>
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	<p>A stack CEMS used for monitoring the sulfur dioxide emissions from the burning of any gaseous fuel shall:</p> <p>(1) Continuously monitor and record the concentration by volume (dry basis, zero percent excess air) of sulfur compounds in ppmv as SO<sub>2</sub> emitted into the atmosphere;</p> <p>(2) Include either an oxygen monitor for correcting the data for excess air or a fuel gas and exhaust gas flowmeter for the determination of mass emissions;</p> <p>(3) Have the span value of all the monitors set so that all readings fall between 20 and 95 percent, for four-hour and daily averages, and between 10 and 95 percent, for monthly averages, of full scale;</p> <p>(4) When using an oxygen monitor for the correction of excess air, be able to measure a sulfur compound concentration emission limit of 5 ppm (dry basis, zero percent excess air), which is stoichiometrically equivalent to the limit of sulfur compound content of 40 ppm calculated as H<sub>2</sub>S in the gaseous fuels;</p> <p>(5) Use District Methods 100.1 or 6.1 (as applicable for sulfur compound analysis) and District Method 3.1 (for oxygen content analysis), or District Method 2.1 (for flowrate determination), whichever is applicable, or any other methods demonstrated by the applicant to be equivalent and approved in writing by the Executive Officers of the District and the CARB, and the Regional Administrator of the EPA, Region IX, or their designees, for conducting the relative accuracy evaluations. The relative accuracy limit shall be 1 ppm and zero drift (2-hour and 24-hour) and calibration drift (2-hour and 24-hour) limits for sulfur compounds monitor shall be 5 percent of the span range; and</p> <p>(6) Check for calibration drift of the monitoring system at least once daily (approximately 24-hr interval) at two concentrations, one high level and one low level. Whenever the daily high level or low level calibration drift exceeds 5% of analyzer full scale span, the monitoring system shall be deemed to be out of control and subject to the requirements of subparagraph (d)(2)(B) of this rule.</p> <p>(7) Facilities burning fuel gas subject to this rule shall comply with the requirements of Rule 218 except where specific requirements have been incorporated into this rule.</p> <p style="text-align: center;"><b>SECTION III</b>  <b>GUIDELINES FOR APPROVAL OF ALTERNATIVE MONITORING PLAN</b>  <b>BY THE EXECUTIVE OFFICER</b></p> <p>In lieu of a continuous fuel gas monitoring system (CFGMS) or a continuous emission monitoring system (CEMS), a person subject to this rule may submit an alternative monitoring plan to the Executive Officers of the District, the California Air Resources Board (CARB), and the Regional Administrator of the Environmental Protection Agency (EPA), Region IX, or their designees for their review and decision.</p> <p>(1) A test program to determine the correlation between H<sub>2</sub>S and total sulfur in the fuel gas using District Method 307-91. If a correlation is established, a colorimetric test, or other alternative method approved by the Executive Officer as being equivalent or better in establishing such correlation, may be conducted regularly to determine total sulfur using H<sub>2</sub>S as a surrogate.</p> <p>(2) An error analysis between colorimetric, or other approved alternative method readings and the total reduced sulfur analysis obtained from District Method 307-91. To demonstrate equivalency between the two methods of analyses, the relative accuracy shall not exceed 20 percent of average District Method 307-91 readings.</p> <p>(3) A schedule for a daily or more frequent analysis of the fuel gas for H<sub>2</sub>S</p>
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	<p>using the colorimetric test, or other approved alternative method, and a minimum weekly analysis of the fuel gas using District Method 307-91. A different frequency of analysis may be used if the Executive Officer determines that such frequency will ensure compliance with the daily total sulfur limits of this rule.</p> <p>(4) When the sulfur level is suspected to be at or above the sulfur content requirements of Table 1 as determined by the colorimetric or other alternative method, a procedure to obtain at minimum a daily sample to be tested according to District Method 307-91 until three consecutive daily samples show that total sulfur is below the sulfur content requirements of Table 1.</p> <p><b>(a). Please clarify when the gas fans and misters will be transferred to fans and misters that run on electricity in order to reduce the sulfur oxides from burning such equipment.</b></p> <p><b>(2). Please list all Continuous Emission Monitors Systems (CEMS) that are currently at CCL. Please provide a list of equipment that will be replacing equipment that is no longer as efficient do to age or any other reason.</b></p> <p><b>(3). Please list any Continuous Fuel Gas Monitoring System (CFGMS) that you have in place.</b></p> <p><b>(5). Please clarify and list the daily averages for Sulfur Compounds readings that have occurred this year. Please highlight any day the Sulfur Compounds were above the AQMD lowest limit allowed.</b></p> <p><b>(6). Please provide a list any gas that was released from a process unit as a result of any process upset or breakdown.</b></p> <p><b>(7). Please Clarify by providing a list of any gaseous material which is currently and will be releasing heat while burning on the grounds at CCL.</b></p> <p><b>(8) Please list all possible Landfill Gas at CCL. Please include how CCL test for all gases from organic waste. Please list what machines and procedures are in place to control Landfill Gas from escaping. Please list how all data pertaining to landfill gases, limits of gases, and excesses of escaping gases are documented and stored.</b></p> <p><b>(9). Please include CCL's best estimate for present and future Monthly Weighted Average Sulfur Content.</b></p> <p><b>(10) Please clarify at what levels at or used by any services on the grounds at CCL.</b></p> <p><b>(11) Please list the reporting and record keeping for monitoring Oxides of Sulfur Emission.</b></p> <p><b>(16) Please provide a best guess estimation of the Diesel Fuel that is expected to be released into the atmosphere from diesel burning machines on the landfill and those that will be delivering to the landfill. Be sure to include the entire trip of the trucks from starting destination to ending destination on an average Stream Day.</b></p>
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		<p><b>(3) Please clarify dates that CCL has achieved equivalent Sulfur oxides emission reductions within the facility. Please provide documentation that CCL has complied with an Optional Facility Compliance Plan (OFCP) which has been approved in writing by the Executive Officer.</b></p> <p><b>(A) Please provide all documentation that shows evidence that all data, records, and other information necessary to determine eligibility for alternative emission control, including but not limited to: (i) A list of equipment and a description of the equipment where the gaseous fuel is being produced and/or burned; (ii) The amount of fuel produced by and/or to be burned in each piece of equipment listed in clause (c)(3)(A)(1) (iii). The estimated emissions of sulfur dioxide from each piece of equipment and (iv) Historical and projected information on fuel usage.</b></p> <p><b>(B) please provide documentation that the daily total SOx emissions under the OFCP from all sources within the facility regulated under Rule 431.1 would be less than or equal to SOx emissions that would have been emitted based on actual total SOx emissions from each source, or the sulfur content limits.</b></p> <p><b>(C). Please provide documentation that all permit units subject to the specified rule emissions limitations are in compliance with all applicable District rules or are on an approved schedule of compliance.</b></p> <p><b>(D)(A). Please provide any documentation of noncompliance and the submit form to become compliant.</b></p> <p><b>(B) Please provide documentation if ever out of compliance at the CCL in the past five year.</b></p> <p><b>(C) Please provide the demonstration of compliance documentation within the last five years. Please list how compliance will be maintained with equations that show 4x the trash then that which was taken by CCL in the year 2013.</b></p> <p><b>(d). Please provide all documentation that proves compliance with (d)(1) and (d)(2), or (d)(3).</b></p>	49-33 cont'd
11.4	New Source Review Rules for Air Toxics	<p>DEIR States: Air quality management in California is governed by the federal and California Clean Air Acts (CAA) and the California Health and Safety Code. Several levels of government have adopted specific regulations that limit emissions from stationary combustion sources, some of which are applicable to this project. The agencies having authority for this project are shown in Table 11-3. The applicable federal, state, and local laws, ordinances, regulations and standards, and compliance with these requirements are discussed in more detail in the following sections.</p> <p><b>Please Clarify the cancer risk provided by CCL, please include diesel exhaust, with maximum wait time for trucks coming into and leaving CCL.</b></p> <p><b>Source Specific Rules: Landfill Gas Emission Control (Rule 1150.1)</b></p>	49-34

		<p><b>Please clarify how public nuisance will be at a level that is acceptable for residents near the landfill. Please clarify how the landfill has addressed the detriment to public health cause by exposure to such emissions from CCL solid waste landfill. Samuel Dixon document suggest that respiratory problems in Val Verde are much higher than the rest of Santa Clarita. Please ensure that CCL is bonded as to lessen the burden on the county as class action law suits are more than likely to occur.</b></p>	49-34 cont'd
11.5.1	Existing Operating Emissions	<p>DEIR States the following: CCL actively receives waste at a roughly 200-foot by 300-foot working face within the site. Daily operations at the existing landfill consist of typical waste disposal activities and facilities that contribute criteria pollutants to the ambient air in the air basin. The operation of landfills and the associated emission rates are unique in comparison to land development projects because landfill operations require the regular use of heavy-duty construction equipment and collection vehicles, long-term exposure of non-vegetated soil layers, constant movement of soil and refuse, and proper on site disposal of LFG. An LFG collection system has been installed in both closed and active landfill areas, and a 9.2 megawatt (MW) landfill gas-to-energy (LFGTE) plant and flare station have been added to combust the collected gases. Air emissions from landfill operations are associated with fugitive LFG emissions, operation of the flare stations and LFGTE plant, construction vehicles and waste transfer trucks at refuse fill areas, construction of additional modules for waste receiving, and closure of modules that have reached capacity.</p> <p><b>Please clarify all the criteria pollutants at CCL. Please list the steps being taken to make sure that the pollutants stay within the landfill. Please clarify at what level per month/week/hour that fugitive LFG emissions are being produced. Please list the steps and at what levels they currently limit the fugitive LFG emissions from escaping the property at CCL.</b></p>	49-35
11.5.1.1	Landfill Gas Surface Emissions	<p>DEIR States: As part of landfill operation, gas wells and pipelines are installed to capture the gas generated by the decaying solid waste. Initially, the LFG is mostly carbon dioxide (CO<sub>2</sub>). As the buried waste ages, the available oxygen decreases and anaerobic conditions are created producing CH<sub>4</sub> and reduced sulfur compounds. CH<sub>4</sub> is a powerful greenhouse gas (GHG) and reduced sulfur compounds have strong odors. Potential GHG impacts from the Proposed Project are discussed in Chapter 12.0, Greenhouse Gas Emissions and Climate Change. The collected gas is monitored to be sure that the collection system is collecting LFG without drawing in ambient air. The collected gas is combusted in either the LFGTE plant or a flare, converting the CH<sub>4</sub> to CO<sub>2</sub> and reduced sulfur compounds into SO<sub>2</sub>. Two LFG flares, each with a capacity of 4,000 cubic feet per minute, are currently in operation. The gas wells and pipelines collect an average of 85 percent of the LFG produced, and about 15 percent of the gas generated in the landfill escapes as fugitive emissions. Several actions are taken to minimize these emissions:</p> <p>Gauge pressure is negative at the gas extraction well</p> <p>Nitrogen and oxygen concentrations are monitored to minimize excess air infiltration</p> <p>LFG temperatures at the gas extraction wells are monitored to limit the potential</p>	49-36

		<p>for subsurface fires</p> <p>CH<sub>4</sub> concentrations across the landfill surface are monitored to prevent seeping of CH<sub>4</sub> gas from the landfill surface. In addition to the emission sources described above, CCL has underground diesel storage tanks, a material recovery facility, and a truck storage and maintenance facility. Additionally, CCL intends to resume a composting operation, previously active from 1997 to 2009, in the future.</p> <p><b>Please clarify at what level is gas being captured now. Please clarify how much CH<sub>4</sub> is escaping into the environment at this time. Please clarify if the flares release any fugitive particles into the air, no matter how small. Please clarify what steps or procedures are in place to bring back the Nitrogen and oxygen to acceptable levels once they have been found to be below/above acceptable levels. Please clarify the steps that are being taken to stop the seeping of CH<sub>4</sub> gas through the exterior mountain walls of the landfill.</b></p>
11.5.1.2	Mobile Source Emissions	<p>DEIR States: Fugitive Dust Emissions Fugitive dust emissions are generated during operation of the landfill by the following activities:</p> <p>Heavy equipment operations (scrapers, bulldozers, compactors, graders, and water trucks) that apply daily and intermediate cover to refuse, compact refuse and soil, maintain haul road conditions , and work the face of the landfill</p> <p>Excavation and grading activities</p> <p>Soil stockpiles</p> <p>Landfill liner installation and final cover construction</p> <p>Truck travel on paved and unpaved roads Mobile Tailpipe Exhaust Emissions Mobile tailpipe exhaust emissions are generated during operation of the landfill by the following activities:</p> <p>Onsite service trucks and heavy equipment</p> <p>Collection trucks, transfer trucks, and passenger vehicles that deliver solid waste and yard waste</p> <p>Passenger vehicles associated with landfill employees</p> <p><b>Please include steps and procedures to control the escaping of all fugitive dust from heavy equipment operations (scrapers, bulldozers, compactors, graders, and water trucks), excavation and grading activities, soil stockpiles, landfill liner installation and final cover construction, and truck travel on paved and unpaved roads.</b></p> <p><b>Please include in the draft EIR the cancer danger along with asthma danger from mobile Tailpipe Exhaust Emissions. Please make sure to include the mileage of all diesel trucks that deliver to the landfill over the</b></p>

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49-37

		<p><b>course of the entire trip. That would include from Victor Ville all the way to Sacramento or beyond. Please re-adjust the potential air quality and compare it to the AQMD quality chart. Please re-adjust the air quality standard near the landfill to properly represent the reality of the cancer rate and health hazards of living near CCL.</b></p>	49-37 cont'd
Table 11-5		<p>SCAQMD Air Quality Significance Thresholds</p> <p><b>Please clarify and address how the levels today at CCL compare with the Mass Daily Thresholds for all gases/chemicals listed. Please factor in The TAC's from all diesel equipment leaving and entering CCL making sure to include the distance of the trip starting and beginning location to CCL and then returning to original location, once factored in the compare it to the Toxic Air Contaminants (TAC), Odor, and GHG Thresholds. Please list the Ambient Air Quality at CCL for NOc, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, CO and then compare them to the Ambient Air Quality for Criteria Pollutants. Please include any reading that were out of acceptable levels within the last 10 years, and justify steps and procedures to bring them back to acceptable AQMD standards.</b></p>	49-38
11.6.3.1	Construction Impacts	<p>DEIR States: Impact AQ-1: Implementation of the Proposed Project would generate construction impacts that would not exceed the criteria pollutant significance thresholds used by SCAQMD to determine significance of construction emissions. Construction – related impacts would be less than significant. Impact Discussion. Temporary impacts from construction were evaluated for the pollutants NO<sub>x</sub>, reactive organic gases (ROG), CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Construction equipment and vehicle exhaust would be the primary sources of NO<sub>x</sub>, ROG, CO, SO<sub>2</sub>, and PM<sub>2.5</sub> emissions, while excavation and grading activities would be the primary sources of PM<sub>10</sub> emissions. The estimated maximum daily construction emissions for project years 2016 and 2021 are presented in Tables 11-6a and 11-6b, respectively. No construction activities are expected to occur in 2032; therefore the project would not have any emissions associated with construction in that year. Emission estimates demonstrate that the Proposed Project would be above the significance thresholds for NO<sub>x</sub> and ROG for 2016 and for NO<sub>x</sub> in 2021. All other pollutants were below the SCAQMD emission thresholds. Even though construction emissions of NO<sub>x</sub> and ROG are above the mass daily emission threshold for 2016 and construction emissions of NO<sub>x</sub> are above the mass daily emission threshold for 2021, these emission scenarios are anticipated to have a very short duration. The potential impacts from construction emissions were further analyzed using the AERMOD dispersion modeling system and compared to the ambient air thresholds. Tables 11-7a and 11-7b provide a summary of the dispersion model predicted impacts from construction emissions as compared to the ambient air quality thresholds for criteria pollutants for project years 2016 and 2021, respectively. As mentioned above, dispersion modeling was not conducted for construction activities during project year 2032 because no construction activities are scheduled during that time for the project. All pollutant concentrations associated with construction activities would be below their respective ambient thresholds for each applicable averaging period. Given the short duration of each construction period, the conservativeness of the emission estimates for determining maximum daily construction emissions, the large size of the Proposed Project site, and characteristics of the construction emission sources, modeled ambient</p>	49-39

		<p>air quality impacts at offsite receptors would be less than significant. Therefore, although the Proposed Project construction periods may temporarily exceed the mass daily emission thresholds, the overall impact from construction activities would be less than significant based on modeled ambient impacts from criteria pollutant emissions.</p> <p><b>Please clarify and add to the impact report the diesel exhaust that will be required of the equipment used to ensure that all the supplies that are delivered and removed from the landfill and all other machinery that is not now in the Draft DEIR.</b></p>	49-39 cont'd
Table 11-6b	2021 Proposed Project Construction Emissions	<p>Please see Table 11-6b, 2021 Proposed Project Construction Emissions</p> <p><b>Please clarify and list all procedures and steps that will be taken if any Construction Emission Source exceeds the acceptable level in Table 11-6b. Please include the levels of the last expansion per day and compare it to table 11-6b.</b></p> <p><b>Please clarify why NOx and ROG will be above the emission thresholds for 2016. Please clarify what is considered a very short duration time according to CCL policy. Please clarify what fines will be in place to insure that CCL stays within the allowable emission rates during construction.</b></p>	49-40
Table 11-7a Table 11-7b		<p>Please see Table 11-7a, 2016 Construction Dispersion Model Results Please see Table 11-7b, 2021 Construction Dispersion Model Results</p> <p><b>Please clarify how the table is not above Threshold, but in the writing immediately following it is stated that it will be above for short durations of time. Please include the definition of short duration of each construction period, making sure to include start date, hours of operation per day/week/month and including the projected date. Please give possible penalty or fine for not adhering to time frames once construction has started.</b></p>	49-41
11.6.3.2	Operation Impacts	<p>DEIR States: -Off-Road Diesel Equipment Control Measures: Additional off-road diesel equipment would be equipped with engines meeting Tier 4 emissions standards.</p> <p><b>Please clarify how Tier 4 emissions engines standards would help to control emissions.</b></p> <p>-Additional off-road diesel equipment would be equipped with DPF, which would result in an 85% reduction for particulate matter and a 40 percent reduction for NOx (EPA, 2013f).</p> <p><b>Please clarify the 85% reduction, is that from the equipment used now. Please list What the particulate matter is on a daily basis.</b></p> <p>-Unnecessary truck and equipment idling would be limited to less than 2 minutes, to the extent feasible.</p> <p><b>Please define feasible. Please inform and list how the truck drivers will be force to stop their trucks from idling. One of the graphs in the traffic</b></p>	49-42

		<p>section where traffic would get an F suggests that idling would be severe as traffic would be backed up. Please inform us the steps and procedures to ensure that idling will extremely limited.</p> <p><b>If 40 trucks are backed up for hours at a time, and each of them idles for 2 minutes, then idling would be continuous and air quality would drop drastically. Please recalculate for the reality of the trucks. Add the worst case scenario to the best case scenario.</b></p> <p>- Use of all construction equipment would be suspended during second stage smog alerts.</p> <p>-Fugitive dust from vehicle travel on paved roads would be controlled through the use of a 25-foot-long gravel track out apron and three times daily cleaning of the paved roads, which would result in a 90 percent reduction in particulate matter emissions.</p> <p><b>Please clarify the 90 percent reduction, is that from the present particulate matter emissions or from some date in the future which would just be a model.</b></p> <p>-Fugitive dust from vehicle travel on unpaved roads would be controlled through watering two times daily, applying dust palliatives at least twice a year. <b>Included is the next point which states,</b> "Fugitive dust from soil disturbance would be suppressed with hourly watering and application of dust suppressants, which would reduce particulate matter emission by 90 percent.</p> <p><b>Please clarify where the water will be coming from. Please clarify what will be used when the water shortage will cut into the water allowed to be used at the landfill. Please list any particulates that would be found in the dust palliatives.</b></p>	49-42 cont'd
Tables 11-9	<p>2016 Proposed Project Operation Emissions</p> <p>2021 Proposed Project Operation Emissions</p>	<p>Please see 11-9 tables a, b, &amp; c</p> <p><b>Please re adjust your figures of the impact discussion tables 11-9 to include the emissions not calculated for the material recovery facility, the truck storage and maintenance facility, or the LFGTE plant. Please clarify how the emissions would not change with the increase of 4 times the trash, traffic, the truck storage and maintenance facility, material recovery facility, or the LFGTE plant.</b></p> <p><b>Please refer to section 11.2 and re-figure the projected emissions from waste truck to include in the maximum daily operational totals. Please explain why in 2032 the SCAQMD emissions would be exceeded mass of the daily operational thresholds for NOx for 2032.</b></p> <p><b>Please re-estimate the NOx for both conservative and non-conservative models. Please explain how the buffer between the emission source and potential offsite receptors limits the NOx emissions. Please include alternative measures from other landfills that are not relying on a buffer system only.</b></p> <p><b>Table 11-9a</b></p>	49-43

		<p><b>Does not include offsite vehicle exhaust emission from waste trucks.</b></p> <p><b>Please clarify what the current Emissions are with the offsite vehicle exhaust emissions from waste trucks and factor them into current figures, then factor projected Emissions are with the offsite vehicle exhaust emissions from waste trucks and factor them into future table for 2016 and 2021. Models tend to be flawed to reality, especially since major pollutants have been left out from the public.</b></p>	49-43 cont'd
Tables 11-10a & 11-10b	<p>2016 Operation Dispersion Model Results</p> <p>2021 Operation Dispersion Model Results</p>	<p>DEIR States: Tables 11-10a, 11-10b, and 11-10c provide a summary of the model results from operational impacts as compared to the air quality thresholds for project years 2016, 2021, and 2032, respectively. NOX, SO<sub>2</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub> concentrations would be below their respective threshold for each applicable averaging period.</p> <p><b>Please clarify if just the one model was used, please use other models than just AERMOD dispersion modeling system that can be used to give a more rounded perspective of the projected operational results for 2016, 2021, and 2032. Using just more than one model would give a more accuracy to future models, since the future is speculative at best.</b></p> <p><b>Please clarify and re-calculate the tables to include not just the conservativeness of the emission estimates for pollutant emissions when it comes to determining maximum daily emissions and the variability of operations of the facility day-to-day, but include the much less conservative emission estimates for determining maximum daily emissions and the variability of operations of the facility day-to-day.</b></p> <p><b>Please clarify how many maximum daily emissions are expected in a regular year. Please clarify how many maximum daily emissions has CCL had in the last five years. Please clarify the many maximum days is considered acceptable by the SCAQMD.</b></p>	49-44
Chapter 11 Pages 26 & 27 Including Tables 11-11 & 11-12	Project Design Measures	<p>Please see tables 11-11 and 11-12</p> <p><b>Please clarify the choosing of the worst intersection and using the best traffic model that is outdated. Please re-figure the table to include the worst intersection and the worst traffic model, then compare them side by side, making sure to add comments for both. It would give a more realistic representation. Using the highest concentration for 2009 and 2011 should then be multiplied items 4 which would be the daily gross intake for the landfill. Please include 2012 and 2013 if they are available.</b></p> <p><b>For the future project the maximum 8-hour CO concentration should be calculated by multiplying the project level 1 hour co contribution by the 8 hour persistence factor (0.7) and adding the 9-hour CO background concentration and then multiplying by 4 for the increase in traffic that would come with 4 times the landfill daily intake. It might be wise to multiply by 3 after the calculation is done to figure out the 24 hour intake. Since math is flawed it is likely that there would be a significant Co at the offsite receptors and at hotspots near roadways.</b></p>	49-45
Chapter 11 Page 11-27	Impact AQ-7	<p>DEIR States: Impact AQ-7: Operation of the Proposed Project would result in a net increase</p>	49-46

	<p>in emissions of the nonattainment pollutant, ozone precursors (NOx or ROG). Operation impacts would be less than significant due to implementation of Project Design Measures.</p> <p>Impact Discussion. The estimated maximum daily mass emissions from operation of the Proposed Project are presented in Tables 11-9a, 11-9b, and 11-9c for project years 2016, 2021, and 2032, respectively. The Proposed Project operational emissions would exceed the SCAQMD operation mass daily thresholds for ozone precursor NOx for 2032.</p> <p>Even though operational emissions from NOx are above the mass daily emission threshold for 2032, this emission scenario represents maximum potential daily emissions, which were estimated using conservative assumptions and are not anticipated to occur for every day of the year. Due to the flares' location in the middle of the site, a buffer would exist between the emission source and potential offsite receptors.</p> <p>Additionally, the majority of NOx emissions in 2032 come from operation of the flare. As described in Chapter 2.0, Project Description, the majority of the LFG collected would go to the existing, approved LFGTE plant instead of the flares as a Project Design Measure. NOx emissions from combustion of LFG in the LFGTE plant turbines would be lower than NOx emissions from the flare.</p> <p>After the implementation of the Project Design Measures for NOx as an ozone precursor, impacts from operation of the Proposed Project would be less than significant.</p> <p>Project Design Measures</p> <p>Same as previously described under Impact AQ-4 with the addition of the following:</p> <p>The Proposed Project includes an existing, approved LFGTE plant, to which the majority of the LFG collected would be sent.</p> <p><b>Please clarify how the increase in emissions of the non-attainment pollutant, ozone precursors (NOx or ROG) would be less than significant. Please clarify by adding all procedures and steps of implementation and how the Project Design Measures will be controlling the NOx or the ROG's.</b></p> <p>Impact discussion page 27:  <b>Please clarify how The Proposed Project operational emissions would exceed the SCAQMD operation mass daily thresholds for ozone precursor NOx for 2032 and it would still be considered safe. Please clarify if conservative assumptions are being used and the NOx is still exceeding then how can the NOx be brought into acceptable levels. Please clarify how many projected days of the years the NOx's will be exceeding the limit. Not expected to occur every day of the year is way too vague, please be more precise.</b></p> <p><b>Please list how the implementation of the Project Design Measures for NOx</b></p>
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		<p><b>as an ozone precursor would bring down the levels to less than significant. Please include all machinery and procedures that would bring all ozone precursors down to less than significant, make sure to include the levels today and how the landfill has successfully brought the levels of ozone precursors.</b></p>
<p>Chapter 11 Page 11-27 &amp; 11-28</p>	<p>Impact AQ-8 Including Tables 11-13a, 11-13b, and 11-13c</p>	<p>DEIR States: Impact AQ-8: Operation would not expose sensitive receptors to substantial pollutant concentrations.</p> <p>Operation impacts would be less than significant. Impact Discussion. Tables 11-13a, 11-13b, and 11-13c present a summary of the maximum health impacts that would occur for operation activities associated with the Proposed Project in the years 2016, 2021, and 2032, respectively. The locations of the maximum cancer risk and maximum HIC receptors for operation are shown in Figure 11-3.</p> <p>The maximum operational impact cancer risk from 2016, 2021, or 2032 at the location of the MEIR is predicted to be 2.37 in 1 million. The MEIR is located approximately 340 meters northwest from the facility boundary. The maximum operational impact cancer risk from 2016, 2021, or 2032 at the location of the MEIW is predicted to be 0.760 in 1 million. The MEIW is located approximately 960 meters from the facility's southeast boundary. The maximum operational impact cancer risk from 2016, 2021, or 2032 at the location of the sensitive receptor is predicted to be 0.823 in 1 million. The sensitive receptor is located approximately 1,750 meters from the facility's northeast boundary. Maximum impacts at the MEIR, MEIW, and sensitive receptor locations would not exceed the SCAQMD cancer risk significance threshold of 10 in 1 million.</p> <p>The HIC and HIA non-carcinogenic impacts from operation would be well below the SCAQMD significance threshold of 1.0.</p> <p><b>Please clarify the flaws in the table as they only include operational activities, but excludes the high amount of diesel trucks that will be carrying trash, idling at the landfill, leaving the landfill, and stuck in grid lock at the entrance of the landfill and along the 126 and 5 corridors. Please give accurate table that includes all factors of the current landfill and then multiply by 4 and then by 3. Use 4 for the increase in trash CCL will be taking and then multiply 3 for the 24 hour operation.</b></p> <p><b>Please see Samuel Dixon Health of Val Verde and notice the 20 times increase in respiratory system that residents now have, compared against all of Samuel Dixon's health clinics. Since the health of Val Verde residents are now affected please clarify how levels of pollutants will be brought into control as to keep the population within acceptable levels of the AQMD.</b></p> <p><b>Please clarify the 2.37 and explain how conservative the estimate is, is it 4, 5, maybe even the 10. Since it is a future model, then it seems that it could be claimed that no one knew it could get so high. Please include all variables for pollutants including the diesel traffic that will be affecting the health along with the daily activities of machinery, soil disruption, and all other activities of the landfill.</b></p>

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49-47

<p>Chapter 11 Page 11-31</p>	<p>Impact AQ-10</p>	<p>DEIR States: Impact AQ-10: Operation would not create objectionable odors affecting a substantial number of people. Operation impacts would be less than significant.</p> <p>Impact Discussion. The Bay Area Air Quality Management District (BAAQMD) recognizes that there is not one piece of information that can solely be used to determine the significance of an odor impact. Therefore, the information provided in Section 11.2 and Appendix F was evaluated collectively to determine the potential for a significant odor impact. The BAAQMD CEQA Air Quality Guidelines suggest that it is possible for an existing odor source to have nearby sensitive receptors, but due to existing factors (wind, topography, seasonality of the odor source, etc.) may not discover any odor complaints from all nearby sensitive receptors. This statement holds true for CCL, in that the 13 confirmed complaints discussed above all came from the Val Verde neighborhood located northwest of the landfill. The additional areas of developed land identified in Figure 11-1 do not have any history of confirmed odor complaints on file for the timeframe evaluated. While there are some sensitive receptors/land uses located near the landfill boundaries, CCL is an existing odor source with a less-than-significant complaint history.</p> <p>Currently, CCL also employs a comprehensive approach to controlling odors by employing several odor control measures. The utilization of LFG collection and control systems, daily cover, water trucks, odor neutralizers, and good housekeeping practices, when applied in concert, can be effective in reducing the creation as well as the transport of offensive odors. CCL also utilizes portable wind fans that can be moved around the landfill boundaries and ridge line based on the immediate wind conditions, supplementing the air flow to dissipate odors. Occasionally, the District Inspectors will visit the landfill when responding to odor complaints. Inspectors have recorded actions used by CCL to mitigate the odors at the time of their visit, including spraying odor neutralizers, utilizing portable wind fans, and delaying future deliveries of alternative daily cover from the supplier to allow for the wind patterns to change, reducing impacts to the neighborhood.</p> <p>SCAQMD does have conditions in the CCL Title V operating permit requiring the landfill to stop operations if confirmed odors cannot be mitigated. The landfill can be penalized for failing to cease operations or mitigate odors as required in the operating permit. Once the odors are mitigated, the landfill may resume operations.</p> <p>Additionally, CCL has an Odor Hotline (phone number: 661-253-5155) the public can call to report odor complaints, allowing faster, more direct action to be taken to resolve the complaint. Some SCAQMD odor complaints for CCL included notes from the District Inspector indicating that CCL's Assistant District Manager and Vice President responded to odor complaints by visiting the complainants at their residences to quickly address any issues.</p> <p>CCL has sensitive receptors near its boundaries, but based on the existing complaint history and current operational practices the odor-related impacts are less than significant.</p>
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49-48

		<p>Project Design Measures Project Design Measures related to odor impacts are described above as part of the significance determination.</p> <p><b>Please clarify the number that is substantial. Please clarify how the landfill will be able to get all complaints from AQMD and any other agencies that have complaints on file. The flaw in section AQ-10 is greatly noted here. Currently residents of Val Verde have reduced their calling because of coincident which brings under question the ability of any Val Verde resident being able to complain. One resident of Val Verde complained about the smells so Animal Control came to his property the next day, handcuffed him and searched his property. Two residents who are neighbors complained and the next day they both had citations for too many vehicles on a property or for a portable shade being too close to a wall figure. This is also included in research done by Chicago State University. <a href="https://webfiles.uci.edu/dstokols/Pubs/Lejano%20%26%20Stokols%20JA%20PR.pdf">https://webfiles.uci.edu/dstokols/Pubs/Lejano%20%26%20Stokols%20JA PR.pdf</a> Please note website as documentation. This shows the injustices done to Val Verde for years and the steps to make them stop complaining. Odors complaints are not accurate due to the fear of retribution that Val Verde residents now feel.</b></p> <p><b>There have been much more complaints since the draft DEIR started and much more visits from county officials.</b></p> <p><b>Please clarify and list all the machinery along with the approximate age of each odor fighting piece of equipment. Please clarify if the machinery runs 24 hours, if it is electric or gas run.</b></p> <p><b>Please clarify how quickly SCAQMD responded to odor complaints. Most responses have occurred well over 3 or more from the original complaint. Due to the fact that Sunshine Canyon Landfill has so many complaints SCAQMD is at their site with phones off. They cannot respond within 3 hours of any call at this time.</b></p>	49-48 cont'd
Chapter 11 11-7	Mitigation Measures	<p>DEIR states the following: Impacts have been mitigated to the extent feasible through the implementation of Project Design Measures. Therefore additional mitigation measures have not been identified.</p> <p><b>Please clarify by adding more mitigation measures. The residents do not feel blaming a flower, neighbor, or a septic tank is acceptable at this time. Please add the mitigation measures that the residents have found to be appropriate at this time.</b></p> <p><b>There is another landfill, Sunshine Canyon Landfill (SCL), that is close by and they have added extra procedures to protect their residents. Borrowing from the Sunshine Canyon Landfill Final Odor Plan of Action, Val Verde would like to be treated similarly.</b></p> <p><b><u>Management of Odors</u></b> <b>The Chiquita Canyon Landfill should, "assign an Environmental Manager</b></p>	49-49

		<p><b>(EM)” responsible for the management of all actions related to odor issues at their site. The EM has the responsibility to ensure all actions related to odor management are being addressed at the site on a day-to-day basis, including the “implementation” of an Odor Plan of Action (OPA) between the residents of Val Verde and Chiquita Canyon Landfill.</b></p> <p><b>Chiquita Canyon Landfill deserves a Corrective Action Manager (CAM) who is available onsite 24 hours a day, 7 days a week. “The responsibility of the CAM will be to provide on-site monitoring for odor abatement purposes. These employees are authorized to address, respond to, investigate and take corrective action(s) as necessary and feasible to remediate the source of odors and document the site’s response to odor issues reported to the site in a timely manner. CAMs will fully be empowered to expend company resources without delay to take necessary and feasible corrective action to remediate an identified source of odors reported to Chiquita Canyon Landfill. The overriding responsibility of the CAM, regardless of the day or time, is to assess the nature and source of odors (when detected), and take appropriate actions that are practical and reasonable to mitigate the source of the odor. A CAM’s responsibilities will include:</b></p> <ul style="list-style-type: none"> <li>• <b>Respond to odor complaints</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> <li>8. <b>Will there be documentation?</b></li> <li>9. <b>Will it be on line?</b></li> <li>10. <b>Will all concerned be informed?</b></li> </ol> </li>   <li>• <b>Investigate potential sources of odor when a complaint is received</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> <li>8. <b>Will there be documentation?</b></li> <li>9. <b>Will it be on line?</b></li> <li>10. <b>Will all concerned be informed?</b></li> </ol> </li> </ul>
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		<ul style="list-style-type: none"> <li>• <b>Follow up with complainants after investigation is complete</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li>   <li>• <b>Coordinate with appropriate site personnel to determine if an immediate action can be taken to mitigate a source of odors when a specific source is identified</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li>   <li>• <b>Work with site personnel to ensure all mitigation measures are in good operational order</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul>
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		<ul style="list-style-type: none"> <li>• <b>Work with site personnel to ensure all mitigation measures are deployed properly</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li>   <li>• <b>Conduct daily onsite inspections to identify potential sources of odors and document inspection results</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li>   <li>• <b>Notify appropriate site personnel of any source of on-site odors immediately after detection</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul>
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		<ul style="list-style-type: none"> <li>• <b>Work with site personnel to determine the immediate or longer term measures to be employed to mitigate a source of odor</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li>   <li>• <b>If appropriate, ensure an immediate mitigation is employed</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li>   <li>• <b>In the case of a longer-term measure, continue to measure progress of the implementation of the measure to ensure it is completed</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul>
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		<ul style="list-style-type: none"> <li>• <b>Assess effectiveness of mitigation measures”</b></li> </ul> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> <li>8. <b>Will there be documentation?</b></li> <li>9. <b>Will it be on line?</b></li> <li>10. <b>Will all concerned be informed?</b></li> </ol> <p><b><u>Requirements</u></b></p> <p>The Sunshine Canyon LFOPA goes on to require officials, “To facilitate coordination of the completion of outstanding corrective actions, a corrective active shift report will be completed at the end of each daily CAM shift providing the status of any corrective actions that have either been completed or are ongoing.”</p> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> <li>8. <b>Will there be documentation?</b></li> <li>9. <b>Will it be on line?</b></li> <li>10. <b>Will all concerned be informed?</b></li> </ol> <p><b><u>Repairs</u></b></p> <p>Given the fact that a CAM is required to be on site 24 hours a day, 7 days each week, if there is source of odor outside of regular facility hours, and it is determined safe to conduct such repairs at those hours, Chiquita Canyon Landfill (CCL) will be committed to working with the local enforcement agencies (LEA) and other regulatory agencies to obtain the necessary written approvals to conduct such repairs.</p> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> </ol>
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		<p>4. If not, Why?</p> <p>5. Who will be informing the nearby residents of environmental issues above?</p> <p>6. Will the residents be informed when there are issues?</p> <p>7. If yes, how will they be informed?</p> <p>8. Will there be documentation?</p> <p>9. Will it be on line?</p> <p>10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>• A minimum of one CAM will be on duty 24 hours per day, 7 days each week.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• A schedule of personnel assigned to the CAM position will be maintained on a weekly basis to ensure all shifts are covered.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• CCL will be committed to fully cooperating with SCAQMD personnel concerning the actions specified in this OPA.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> </ol>
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		<p>5. Who will be informing the nearby residents of environmental issues above?</p> <p>6. Will the residents be informed when there are issues?</p> <p>7. If yes, how will they be informed?</p> <p>8. Will there be documentation?</p> <p>9. Will it be on line?</p> <p>10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>Records kept by the CAMs will be available for inspection by SCAQMD personnel during normal business hours.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>Will the landfill be following through on the same procedures?</li> <li>If not, why?</li> <li>Will the landfill be posting on line the steps they are taking?</li> <li>If not, Why?</li> <li>Who will be informing the nearby residents of environmental issues above?</li> <li>Will the residents be informed when there are issues?</li> <li>If yes, how will they be informed?</li> <li>Will there be documentation?</li> <li>Will it be on line?</li> <li>Will all concerned be informed?</li> </ol> <p><u>Odor Plan of Action</u></p> <ul style="list-style-type: none"> <li>Chiquita Canyon Landfill should have an organized Odor Plan of Action.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>Will the landfill be following through on the same procedures?</li> <li>If not, why?</li> <li>Will the landfill be posting on line the steps they are taking?</li> <li>If not, Why?</li> <li>Who will be informing the nearby residents of environmental issues above?</li> <li>Will the residents be informed when there are issues?</li> <li>If yes, how will they be informed?</li> <li>Will there be documentation?</li> <li>Will it be on line?</li> <li>Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>The OPA will outline the best management procedures that personnel will use to prevent, monitor, and address odor issues.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>Will the landfill be following through on the same procedures?</li> <li>If not, why?</li> <li>Will the landfill be posting on line the steps they are taking?</li> <li>If not, Why?</li> </ol>
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		<p>5. Who will be informing the nearby residents of environmental issues above?</p> <p>6. Will the residents be informed when there are issues?</p> <p>7. If yes, how will they be informed?</p> <p>8. Will there be documentation?</p> <p>9. Will it be on line?</p> <p>10. Will all concerned be informed?</p> <p>By implementation of the odor management tasks, personnel are committed to:</p> <ul style="list-style-type: none"> <li>• <b>Maintaining all systems necessary to minimize odors from facility operations</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• <b>Monitoring odor levels on site during normal operations and activities</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• <b>Monitoring and responding to odor levels offsite.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> </ol> </li> </ul>
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		<p>5. Who will be informing the nearby residents of environmental issues above?</p> <p>6. Will the residents be informed when there are issues?</p> <p>7. If yes, how will they be informed?</p> <p>8. Will there be documentation?</p> <p>9. Will it be on line?</p> <p>10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>• If odors are detected and/or reported, the OPA shall determine the source within the landfill from which odor is generated.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• When practical and safe, the OPA shall take expeditious corrective actions to eliminate or minimize off-site odors at their source.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• The OPA shall gauge the effectiveness of the corrective actions and the progress toward control of odors.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of</li> </ol> </li> </ul>
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		<p>environmental issues above?</p> <ol style="list-style-type: none"> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <p><b><u>Odor Control and Management</u></b></p> <p>The purpose of this section is to outline the best management practices to monitor, control, and prevent odor issues at Chiquita Canyon Landfill. CCL will assign a management staff person to address odor issues, respond to complaints, and ensure corrective actions, if any are needed, are taken and documented.</p> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <p><b><u>Restrictions on Equipment Operations</u></b></p> <ul style="list-style-type: none"> <li>• It should be noted that all but catastrophic investigations and repairs will occur only during normal operating hours.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• CCL should have an odor control and management program.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> </ol>
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		<p>3. Will the landfill be posting on line the steps they are taking?</p> <p>4. If not, Why?</p> <p>5. Who will be informing the nearby residents of environmental issues above?</p> <p>6. Will the residents be informed when there are issues?</p> <p>7. If yes, how will they be informed?</p> <p>8. Will there be documentation?</p> <p>9. Will it be on line?</p> <p>10. Will all concerned be informed?</p> <p><u><i>Weather, or Other Factors</i></u></p> <p>CCL is committed to continue to evaluate these and other odor mitigation measures.</p> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <p><u><i>Odor Mitigation Systems</i></u></p> <ul style="list-style-type: none"> <li>• Vegetative Bands: CCL will install and maintained over 1000 oak trees onsite to create a buffer envisioned to reduce particulate matter. In addition, over 10,000 mitigation oak and big cone fir trees should be planted and maintained in groves surrounding the landfill.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• Misting Systems: CCL's existing odor misting systems are</li> </ul>
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		<p><b>inadequate according to the AQMD and poorly placed. All ridges should have misting systems in order to mediate odors leaking into surrounding communities.</b></p> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• <b>Odor Neutralizing: CCL will use odor neutralizing agents as part of the daily cover operation.</b></li> </ul> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• <b>CCL needs to use various methods of applying odor neutralizing chemicals when adverse odors are present and also under certain mandated conditions. Water containing an odor neutralizer should be applied to the main haul road and all access roads every two hours when CCL is open for waste disposal except during measurable precipitation (Order Condition 5);</b></li> </ul> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> </ol>
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		<p>7. If yes, how will they be informed?  8. Will there be documentation?  9. Will it be on line?  10. Will all concerned be informed?</p> <p><b><u>Odor Plan of Action</u></b></p> <ul style="list-style-type: none"> <li>• A working face perimeter misting system and a separate Dust Boss portable mister should be used at the working face.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• Both of these systems use an odor neutralizer.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• These systems need to be operated continuously from 6 am to 10 am on Mondays and any mornings when adverse winds occur.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> </ol> </li> </ul>
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		<p>8. Will there be documentation?  9. Will it be on line?  10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>• A ridge top landfill perimeter neutralizer misting system needs to be installed and operated continuously during operating hours on Mondays and on other days during adverse winds.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• The perimeter misters need to be operated on a system that automatically turns the misters on when programmed.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul> <p><u><i>Additional Actions CCL Will Need to Take</i></u>  CCL is to continue to evaluate the site's portable misting systems to determine if there are additional mitigation measures related to these systems that can be implemented to reduce odors specifically from the working face. As part of this evaluation, the site's Dust Boss system (manufactured by Dust Control Technology), needs to be in place and should be modified to produce a finer mist that has the potential to have a greater impact on controlling odors generated by the working face.</p> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> </ol>
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		<ol style="list-style-type: none"> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <p><b><u>Transfer Truck Restrictions</u></b>  CCL should prohibit the receipt of trash from 6:00 AM to 9:00 AM on Mondays through Fridays and any days when adverse winds are measured. In addition, Order Condition 1.d. requires neutralizer be applied to transfer trucks under the control of Republic if those trucks depart as Republic operated transfer stations during adverse wind conditions with the intent to deposit a load at CCL. This practice needs to continue to be followed when adverse wind conditions are present as noted above. Working Face to 10,000 square feet or less from 6:00 AM to 10:00 AM on all Monday mornings and any other mornings during adverse wind conditions. 2.2.3.1 Working Odorous Load Management Program CCL to include and implement certain criteria, including the following:</p> <p style="padding-left: 40px;">Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• Provide additional details describing the processes for screening odorous loads prior to delivery and at the scalehouse, including clear procedures, criterion utilized for accepting or rejecting loads and the number of personnel designated.</li> </ul> <p style="padding-left: 40px;">Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> </ol>
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		<p>7. If yes, how will they be informed?  8. Will there be documentation?  9. Will it be on line?  10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>Describe the frequency and nature of any occurrences over the last two years in which CCL rejected any odorous loads, covered such loads with soil, and/or contacted any waste generators for mitigation.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>Will the landfill be following through on the same procedures?</li> <li>If not, why?</li> <li>Will the landfill be posting on line the steps they are taking?</li> <li>If not, Why?</li> <li>Who will be informing the nearby residents of environmental issues above?</li> <li>Will the residents be informed when there are issues?</li> <li>If yes, how will they be informed?</li> <li>Will there be documentation?</li> <li>Will it be on line?</li> <li>Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>Plan to enhance the existing practices for controlling odors at the working face such as covering odorous loads with soil rather than with municipal solid waste as prescribed by California Code of Regulations (CCR), Title 27, Section 20680.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>Will the landfill be following through on the same procedures?</li> <li>If not, why?</li> <li>Will the landfill be posting on line the steps they are taking?</li> <li>If not, Why?</li> <li>Who will be informing the nearby residents of environmental issues above?</li> <li>Will the residents be informed when there are issues?</li> <li>If yes, how will they be informed?</li> <li>Will there be documentation?</li> <li>Will it be on line?</li> <li>Will all concerned be informed?</li> </ol> <p>Val Verde would like CCL to have in place:</p> <ul style="list-style-type: none"> <li>Odorous load screening prior to delivery.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>Will the landfill be following through on the same procedures?</li> <li>If not, why?</li> <li>Will the landfill be posting on line the steps they are taking?</li> <li>If not, Why?</li> </ol>
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		<p>5. Who will be informing the nearby residents of environmental issues above?</p> <p>6. Will the residents be informed when there are issues?</p> <p>7. If yes, how will they be informed?</p> <p>8. Will there be documentation?</p> <p>9. Will it be on line?</p> <p>10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>• <b>Odorous load screening at the scale house.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• <b>Additional actions for controlling odors at the working face (Section 2.3.5).</b></li> </ul> <p><b>Val Verde would like CCL to prescreen non-traditional solid waste loads prior to these wastes being accepted at the site. Republic Services salespersons reportedly work with customers to obtain necessary data and characteristics of the wastes for evaluation.</b></p> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <p><b>Complete documentation of all special waste loads is required prior to the waste being accepted for disposal. Acceptance of the waste by the site's General Manager is also required.</b></p> <p><b>Questions for the above comments:</b></p>
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		<ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <p>The potential for the waste material to generate odor is one issue that is taken into consideration in the Special Waste Screening Process.</p> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <p>A recent example of the value of this process is the rejection by Sunshine Canyon Landfill of a load of raw fish based on its odorous characteristics.</p> <p><u>Rejection of Odorous Loads</u></p> <p>Val Verde would like documented descriptions of the frequency and nature of any occurrences over the last two years in which CCL rejected any odorous loads, covered such loads with soil, and/or contacted any waste generators for mitigation.</p> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> </ol>
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8. Will there be documentation?
9. Will it be on line?
10. Will all concerned be informed?

**Odorous Load Screening Prior to Delivery**

Chiquita Canyon Landfill is a Class III municipal solid waste landfill. The facility's Solid Waste Facility Permit prohibits certain wastes including those that would inherently be considered odorous (e.g. sludge, liquid wastes, and dead animals).

**Questions for the above comments:**

1. Will the landfill be following through on the same procedures?
2. If not, why?
3. Will the landfill be posting on line the steps they are taking?
4. If not, Why?
5. Who will be informing the nearby residents of environmental issues above?
6. Will the residents be informed when there are issues?
7. If yes, how will they be informed?
8. Will there be documentation?
9. Will it be on line?
10. Will all concerned be informed?

To prevent odors, specific procedures for screening odorous loads prior to delivery and at the site's scalehouse need to be developed to define the criterion to be applied to identify odorous loads and the procedures to be followed at the working face to control potential odor emissions from these loads.

**Questions for the above comments:**

1. Will the landfill be following through on the same procedures?
2. If not, why?
3. Will the landfill be posting on line the steps they are taking?
4. If not, Why?
5. Who will be informing the nearby residents of environmental issues above?
6. Will the residents be informed when there are issues?
7. If yes, how will they be informed?
8. Will there be documentation?
9. Will it be on line?
10. Will all concerned be informed?

Chiquita Canyon Landfill should screen for odorous loads prior to delivery.

**Questions for the above comments:**

1. Will the landfill be following through on the same procedures?
2. If not, why?

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		<p>3. Will the landfill be posting on line the steps they are taking?</p> <p>4. If not, Why?</p> <p>5. Who will be informing the nearby residents of environmental issues above?</p> <p>6. Will the residents be informed when there are issues?</p> <p>7. If yes, how will they be informed?</p> <p>8. Will there be documentation?</p> <p>9. Will it be on line?</p> <p>10. Will all concerned be informed?</p> <p>A process for screening loads for odor strength should have been developed with the cooperation of Chiquita Canyon Landfill and transfer station personnel. This process includes the following:</p> <p>Training of appropriate transfer station personnel on criteria to identify odorous loads that could potentially create off site odor issues at CCL.</p> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <p>Val Verde would like Chiquita Canyon Landfill to follow Sunshine Canyon's process below:</p> <ul style="list-style-type: none"> <li>• An odorous load-tracking sheet will be filled out and sent to Chiquita Canyon Landfill to document the load that has been identified.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> </ol>
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		<p style="text-align: center;"><b>10. Will all concerned be informed?</b></p> <ul style="list-style-type: none"> <li>• <b>This sheet is to be sent either to the VVCA or the VVCAC with the condition that the VVCA be notified within 5 working days.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> <li>8. <b>Will there be documentation?</b></li> <li>9. <b>Will it be on line?</b></li> <li>10. <b>Will all concerned be informed?</b></li> </ol> </li>   <li>• <b>Notification to CCL personnel will take place when an odorous load exceeds the threshold criteria of ‘4’ on SCAQMD’s odor classification scale.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> <li>8. <b>Will there be documentation?</b></li> <li>9. <b>Will it be on line?</b></li> <li>10. <b>Will all concerned be informed?</b></li> </ol> </li>   </ul> <p><b>Val Verde would like Chiquita Canyon Landfill to ensure the following:</b></p> <ul style="list-style-type: none"> <li>• <b>Scalehouse personnel have been trained to identify odorous loads based on waste classifications (e.g. food waste, treated medical waste, etc.) and on the use of SCAQMD’s odor classification scale.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> </ol> </li> </ul>
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		<p>8. Will there be documentation?  9. Will it be on line?  10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>• Documentation of these loads including the source, waste classification, odor scale intensity and any other relevant factors are maintained by CCL scalehouse personnel and communicated to the EM on a daily basis for tracking and evaluation.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• Scalehouse personnel will use the same Odorous Load Tracking Sheet previously referenced.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• Evaluation of the most odorous loads will be conducted on a weekly basis to determine which loads are consistently rated as highly odorous.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> </ol> </li> </ul>
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		<p>6. Will the residents be informed when there are issues?  7. If yes, how will they be informed?  8. Will there be documentation?  9. Will it be on line?  10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>• A management decision will be made with respect to the disposition of such waste generators.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul> <p>If an odorous load is accepted, Val Verde requests:</p> <ul style="list-style-type: none"> <li>• Prior to accepting waste each day, an area of the working face is designated for odorous loads;  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• If a highly odorous load is noted by scalehouse personnel (Section 2.3.4), an operations supervisor is notified of the company name and truck number;  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of</li> </ol> </li> </ul>
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		<p>environmental issues above?</p> <ol style="list-style-type: none"> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• The truck is allowed to proceed directly to the working face without delay (if any exists at the time);  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• The truck is directed to the area of the working face that has been designated for odorous loads;  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• A soil layer is placed over the odorous load as soon as it is processed.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> </ol> </li> </ul>
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		<p>6. Will the residents be informed when there are issues?  7. If yes, how will they be informed?  8. Will there be documentation?  9. Will it be on line?  10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>• Additional MSW is placed over the soil layer to provide additional coverage for the odorous load.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul> <p>Val Verde would like all Odor Monitors in place at the Chiquita Canyon Landfill, which would include.</p> <ul style="list-style-type: none"> <li>• Use and maintenance of Kestrel meter;  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• Use and maintenance of Nasal Ranger;  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> </ol> </li> </ul>
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		<p>7. If yes, how will they be informed?  8. Will there be documentation?  9. Will it be on line?  10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>• SCAQMD Landfill odor wheel;  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• Potential use of on-site odor detection sources and characteristics of these odors;  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• Use of worksheets/iPad application;  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> </ol> </li> </ul>
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		<p style="text-align: center;"><b>10. Will all concerned be informed?</b></p> <ul style="list-style-type: none"> <li>• <b>Odor complaint response and documentation.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul> <p><u><i>Val Verde Would Like CCL to Monitor Off Site.</i></u>  We were promised monitors for our neighborhood, which we never received. Odor patrol agents need to conduct off-site patrols in the neighborhood of Lincoln Road and Chiquita Canyon Road and of any future neighborhoods with more than three calls in a given week. Off-site odor equipment should be used for the town of Val Verde, such as, but not limited to:</p> <ul style="list-style-type: none"> <li>• <b>Kestrel (Model No. 4500) used to determine wind speed, wind direction, temperature and percent humidity.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• <b>Nasal Ranger used to evaluate the relative strength of an odor;</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> </ol> </li> </ul>
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		<p>6. Will the residents be informed when there are issues?  7. If yes, how will they be informed?  8. Will there be documentation?  9. Will it be on line?  10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>iPads (effective January 2012) used to record all odor observations that are subsequently downloaded to a spreadsheet.</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>Will the landfill be following through on the same procedures?</li> <li>If not, why?</li> <li>Will the landfill be posting on line the steps they are taking?</li> <li>If not, Why?</li> <li>Who will be informing the nearby residents of environmental issues above?</li> <li>Will the residents be informed when there are issues?</li> <li>If yes, how will they be informed?</li> <li>Will there be documentation?</li> <li>Will it be on line?</li> <li>Will all concerned be informed?</li> </ol> <p>Val Verde Civic Association would like in writing the off-site odor complaint reports, to include, but not limited to:</p> <ul style="list-style-type: none"> <li>Complainant time of day</li> <li>Weather conditions at the time of the complaint</li> <li>Wind direction and speed at the time of the complaint</li> <li>Duration of odor</li> <li>Characteristic of odor (what did it smell like, per SCAQMD odor wheel)</li> <li>Intensity of odor (per SCAQMD intensity scale )</li> <li>Characteristic of wind (steady, variable, swirling)</li> <li>Any other general observations</li> </ul> <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>Will the landfill be following through on the same procedures?</li> <li>If not, why?</li> <li>Will the landfill be posting on line the steps they are taking?</li> <li>If not, Why?</li> <li>Who will be informing the nearby residents of environmental issues above?</li> <li>Will the residents be informed when there are issues?</li> <li>If yes, how will they be informed?</li> <li>Will there be documentation?</li> <li>Will it be on line?</li> <li>Will all concerned be informed?</li> </ol> <p>Please address each point above in all answers.</p> <p><u>Reporting</u></p> <ul style="list-style-type: none"> <li>A summary of odors events attributed to the landfill</li> </ul>
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		<p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• <b>A summary of all odor events recorded by the Odor Monitors during the odor patrols</b> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• <b>The number of odor detections in the neighborhood attributed to each event</b> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• <b>Details on site activities that could be reasonably be contributing to off-site-odors</b> <p><b>Questions for the above comments:</b></p> </li> </ul>
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		<ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• Actions that are being taken by CCL to address and mitigate the source of odors and the migration of odors to off-site locations           <p style="margin-left: 20px;">Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul> <p>Additional Actions that Val Verde would like the landfill to take as good faith neighbors:</p> <ul style="list-style-type: none"> <li>• Notify the local community and appropriate state and local regulatory authorities in advance when planned work may generate odors;           <p style="margin-left: 20px;">Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul> <ul style="list-style-type: none"> <li>• Respond to complaints via phone or by personal visit, and</li> </ul>
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		<p><b>investigate and document each complaint thoroughly</b></p> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• <b>Avoid adversarial relationships</b></li> </ul> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• <b>Establish a single point of contact and/or center of responsibility for dealing with odor complaints</b></li> </ul> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• <b>Establish and implement a formal odor complaint management program and complaint response system;</b></li> </ul> <p><b>Questions for the above comments:</b></p>
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		<ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• Maintain a proactive community relations program and schedule to address odor issues. <ul style="list-style-type: none"> <li>Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul> </li> </ul> <p>Activities under this program include:</p> <ul style="list-style-type: none"> <li>• Efforts to develop relationships with local authorities, complainants, and community leaders to create a reliable response system to complaints;</li> <li>• Enlistment of neighbors to help identify and report issues about odor directly to the site;</li> </ul> <ul style="list-style-type: none"> <li>Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul>
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		<ul style="list-style-type: none"> <li>• <b>As necessary, enlist the help of qualified consultants and vendors who can assist odor control efforts;</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> <li>8. <b>Will there be documentation?</b></li> <li>9. <b>Will it be on line?</b></li> <li>10. <b>Will all concerned be informed?</b></li> </ol> </li>   <li>• <b>Document efforts to mitigate identified issues;</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> <li>8. <b>Will there be documentation?</b></li> <li>9. <b>Will it be on line?</b></li> <li>10. <b>Will all concerned be informed?</b></li> </ol> </li>   <li>• <b>Document operational activities performed at the time the odor occurred (e. g., gas system work)</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> <li>8. <b>Will there be documentation?</b></li> <li>9. <b>Will it be on line?</b></li> <li>10. <b>Will all concerned be informed?</b></li> </ol> </li> </ul> <p><b>Further things Val Verde would like Chiquita Canyon Landfill to do to ensure odors are contained:</b></p>
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		<ul style="list-style-type: none"> <li>• <b>Install more vertical gas extensions</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li>   <li>• <b>Install more linear feet of horizontal collectors to capture landfill gas that is generated in its earliest stages.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li>   <li>• <b>Install more linear feet of additional piping to connect the gas wells to the header system.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li>   <li>• <b>Install new permanent flares over all areas of existing landfill</b>  <b>Questions for the above comments:</b> </li> </ul>
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		<ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> <ul style="list-style-type: none"> <li>• Install and operate new, larger horsepower blowers.           <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• Monitor wells at least twice per month.           <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• Monitor surface emissions (instantaneous and integrated) every month over the entire site.           <p>Questions for the above comments:</p> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> </ol> </li> </ul>
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		<p>3. Will the landfill be posting on line the steps they are taking?</p> <p>4. If not, Why?</p> <p>5. Who will be informing the nearby residents of environmental issues above?</p> <p>6. Will the residents be informed when there are issues?</p> <p>7. If yes, how will they be informed?</p> <p>8. Will there be documentation?</p> <p>9. Will it be on line?</p> <p>10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>• <b>Develop an aggressive program to remove liquids that accumulate in the gas wells.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• <b>Check daily on sumps that collect liquids in the gas collection system.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• <b>Install another state-of-the-art ultra-low emissions flare.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> </ol> </li> </ul>
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		<p>4. If not, Why?</p> <p>5. Who will be informing the nearby residents of environmental issues above?</p> <p>6. Will the residents be informed when there are issues?</p> <p>7. If yes, how will they be informed?</p> <p>8. Will there be documentation?</p> <p>9. Will it be on line?</p> <p>10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>• Increase the available vacuum to the well field and improve the flow of gas to the efficient flares. <ul style="list-style-type: none"> <li>Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul> </li> <li>• Raise LFG wells; <ul style="list-style-type: none"> <li>Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul> </li> <li>• Repair broken or leaking piping. <ul style="list-style-type: none"> <li>Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> </ol> </li> </ul> </li> </ul>
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		<p>6. Will the residents be informed when there are issues?  7. If yes, how will they be informed?  8. Will there be documentation?  9. Will it be on line?  10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>• Repair condensate sumps and replace extraction wells or monitoring probes and any repair of flare station components.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• Respond rapidly to blower failure  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• Respond rapidly to flame failures.  Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> </ol> </li> </ul>
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		<p>9. Will it be on line? 10. Will all concerned be informed?</p> <ul style="list-style-type: none"> <li>• Respond rapidly to alarm conditions and alarm failures. Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• Respond rapidly to flare exhaust temperature sensors or controller failure. Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> <li>• Respond to odor complaints and repair main gas pipe breaks that disrupt gas flow. Questions for the above comments: <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul>
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		<ul style="list-style-type: none"> <li>• <b>Install one 50 foot tall, 13-foot diameter flare stack equipped with a multi-jet burner, propane gas pilot, electric igniter, UV flame sensor, automatic shutdown and alarm system, automatic combustion air regulating system and temperature controller.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li>   <li>• <b>Condensate knock-out drums with mist eliminator.</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li>   <li>• <b>Condensate pumps, serving condensate knockout drums and particulate filters:</b>  <b>Questions for the above comments:</b> <ol style="list-style-type: none"> <li>1. Will the landfill be following through on the same procedures?</li> <li>2. If not, why?</li> <li>3. Will the landfill be posting on line the steps they are taking?</li> <li>4. If not, Why?</li> <li>5. Who will be informing the nearby residents of environmental issues above?</li> <li>6. Will the residents be informed when there are issues?</li> <li>7. If yes, how will they be informed?</li> <li>8. Will there be documentation?</li> <li>9. Will it be on line?</li> <li>10. Will all concerned be informed?</li> </ol> </li> </ul>
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		<ul style="list-style-type: none"> <li>• <b>Install at least two blowers per flare.</b></li> </ul> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> <li>8. <b>Will there be documentation?</b></li> <li>9. <b>Will it be on line?</b></li> <li>10. <b>Will all concerned be informed?</b></li> </ol> <p><b>Since the AQMD has informed Val Verde residents that the Chiquita Canyon Landfill does the least to ensure that odors stay on their property, the residents would like the fans to be electric and not gas to ensure that they can sleep through the night. Many nights the fans run out of gas and loss of sleep is a big issue in Val Verde.</b></p> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> <li>8. <b>Will there be documentation?</b></li> <li>9. <b>Will it be on line?</b></li> <li>10. <b>Will all concerned be informed?</b></li> </ol> <p><b>Since the misters are not place in the right locations, according to AQMD, Val Verde would like additional misters on ridges. These misters should be electric to ensure they work the entire night to control odors.</b></p> <p><b>Questions for the above comments:</b></p> <ol style="list-style-type: none"> <li>1. <b>Will the landfill be following through on the same procedures?</b></li> <li>2. <b>If not, why?</b></li> <li>3. <b>Will the landfill be posting on line the steps they are taking?</b></li> <li>4. <b>If not, Why?</b></li> <li>5. <b>Who will be informing the nearby residents of environmental issues above?</b></li> <li>6. <b>Will the residents be informed when there are issues?</b></li> <li>7. <b>If yes, how will they be informed?</b></li> <li>8. <b>Will there be documentation?</b></li> </ol>
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		<p><b>9. Will it be on line?</b> <b>10. Will all concerned be informed?</b></p>	49-49 cont'd
		<p><b>All other landfills have left gas equipment long ago. As good neighbors it should be expected that every extra step to ensure the wellbeing (that includes sleep) of Val Verde residents are taken.</b></p>	49-50
		<p><b>Earthquake is another concern. Val Verde would like to know if the many tears were ever fixed from the Northridge Earthquake. Did gas escape into the air, due to the fact that newspapers reported that Val Verde Landfill was the only to fail in all sections during the Northridge Earthquake? What steps will be taken to ensure that CCL will not fail in the next earthquake? Was the Santa Clara River ever monitored for leaking hazardous fluids that leak from the landfill now? Will it be monitored? Will the landfill be able to stop gases from leaving their property during a major earthquake?</b></p>	49-51
Chapter 11	Table 11-14 2021 Cumulative Construction Dispersion Model Results	<p>Please See Table 11-14, page 11-31</p> <p><b>Please clarify; as to the date that the diesel exhaust from all the trash haulers will be added to correlating tables to bring in the fact that there is significant impact.</b></p> <p><b>Please clarify, it was noticed that table 11-14 was the more stringent of the NAAQS/CAAQS/LST, Please clarify the date CCL will be modifying all previous tables to more stringent standards. Please list the short duration of each construction period, in months, years, and days since short duration is vague at best. Please clarify, since you are giving conservative estimates that leads one to believe that they are slanted to find few pollutants when in actuality there are many that are being overlooked in the tables and data given. The responses of the last draft DEIR they could not answer questions regarding the future and that would be true for this draft DEIR; they are speculations at best and not accurate at best.</b></p>	49-52
11.9.1.2	Health Impacts	<p>DEIR States: Table 11-15 presents a summary of the cumulative maximum health impacts that would occur for construction activities associated with the Proposed Project for project year 2021. The locations of the cumulative maximum cancer risk and cumulative maximum HIC receptors for construction are shown in Figure 11-4.</p> <p>The maximum cumulative construction impact cancer risk for project year 2021 at the location of the residential maximally exposed individual (MEIR) is predicted to be 2.54 in 1 million. The maximum cumulative construction impact cancer risk for project year 2021 at the location of the worker maximally exposed individual (MEIW) is predicted to be 2.03 in 1 million. The maximum cumulative construction impact cancer risk for project year 2021 at the sensitive receptor location is predicted to be 2.54 in 1 million. Because the Newhall Ranch developments include residential, commercial, open space, public, and industrial areas, receptors could not be specified. Therefore, any receptor within the development was conservatively considered either residential, worker, or</p>	49-53

		<p>sensitive. The MEIR, MEIW, and sensitive receptor is located approximately 400 meters west of the facility boundary in the Newhall Ranch development. Maximum cumulative impacts at the MEIR, MEIW, and sensitive receptor locations would not exceed the SCAQMD cancer risk significance threshold of 10 in 1 million.</p> <p>The cumulative HIC non-carcinogenic impacts from construction would be well below the SCAQMD significance threshold of 1.0 (see Table 11-15).</p> <p><b>Please clarify, since the diesel exhaust of the massive amounts of the trucks are not factored in to the math of 2.03 or 2.54 in a million then the math is greatly flawed. Please factor in the diesel. A study out of Irvine factors in 100 in a million which is greatly above the CCL math. Please include a realistic number that would represent what will be, not what could be in a perfect world.</b></p>	49-53 cont'd
Chapter 11 Tables 11-16a & 11-16b	2021 Cumulative Operation Dispersion Model Results & 2032 Cumulative Operation Dispersion Model Results	<p>Please See Tables 11-16a &amp; 11-16b on page 11-34</p> <p><b>Please refactor the results for NOx, SO<sub>2</sub>, and CO using more than just one AERMOD dispersion model system, please include at least one more dispersion model; more favorable 2 models. Please make sure they are not all conservative and reflect reality of any landfill.</b></p> <p><b>Please clarify if watering cannot be done at the end of section 11, then why was it so big in the draft DEIR. Please re-do any sections of the draft DEIR that is based on water being involved in any way.</b></p> <p><b>Please list the number of days that the Proposed Projects maximum emissions are expected for each given year. Please include the expected levels NOx, So<sub>2</sub>, Co, and annual PM<sub>2</sub> on any given day they are expected to reach or exceed maximum emissions.</b></p>	49-54
11.9.2.2	Localized CO Impacts	<p>DEIR States: A CO hotspot analysis of the worst intersections and dispersion modeling of emissions from operation activities were conducted for the Proposed Project to evaluate whether an air quality standard would be violated. Cumulative projects expected to affect traffic conditions in the project area include the Newhall Ranch developments and the SR-126 Improvements Project. The SR-126 Improvements Project would improve traffic conditions at the SR 126/Commerce Center Drive intersection and the project is proposed to accommodate future traffic growth in the area. The Newhall Ranch developments would require detailed CEQA analysis and adequate mitigation measures; therefore, it is reasonable to assume that they would also include mitigation measures (including roadway and intersection improvements) to reduce any cumulative traffic impacts on the surrounding road network to a less-than-significant level. Therefore operation of the Proposed Project would have a less-than-significant cumulative impact for CO at offsite receptors and at hotspots near roadways.</p> <p><b>Please clarify using the table in the Traffic Section of the Draft DEIR that gives the projected traffic an F rating. If one table gives an A rating and the other gives an F rating then maybe a "C" scenario should be represented in the response of the DRAFT DEIR.</b></p>	49-55

11.9.2.3	Health Impacts	<p>DEIR States: Tables 11-17a and 11-17b present a summary of the maximum cumulative health impacts that would occur for operation activities associated with the Proposed Project in the years 2021 and 2032, respectively. The locations of the maximum cumulative cancer risk and maximum cumulative HIC receptors for operation are shown in Figure 11-5.</p> <p>The maximum cumulative operational impact cancer risk for project years 2021 or 2032 at the location of the MEIR is predicted to be 5.66 in 1 million. The maximum cumulative operational impact cancer risk for 2021 or 2032 at the location of the MEIW is predicted to be 1.33 in 1 million. The maximum operational impact cancer risk for 2021 or 2032 at the location of the sensitive receptor is predicted to be 5.66 in 1 million. The MEIR, MEIW, and sensitive impacts are located 860 meters east from the facility boundary in the Newhall Ranch development. Maximum cumulative impacts at the MEIR, MEIW, and sensitive receptor locations would not exceed the SCAQMD cancer risk significance threshold of 10 in 1 million.</p> <p>The HIC and HIA non-carcinogenic cumulative impacts from operation would be well below the SCAQMD significance threshold of 1.0.</p> <p><b>Please clarify to the conservative of the cancer rate. 5.66 is well above the suggested 1.0 of the SCAQMD. Since this is a speculative projection then it is safe to assume that it could go to 10 or above or even be reduced. The cancer risk is at 5.66 and that is without factoring in the diesel exhaust, with that factored in the cancer rate would be well above the SCAQMD cancer risk significance threshold of 10 in 1 million. At best it appears that data was left out of this draft DEIR in order to limit the reality of what will be, and the risk to children as well as adults that live near CCL.</b></p> <p><b>Please clarify; Health risk seems significant and CCL's Draft DEIR says less than significant. SCAQMD has anything above one in the Chronic (it exceeds the acceptable rate) range. Please rewrite less than significant to reflect what the SCAQMD table suggest. Do to the risk factor being extremely high I would suggest that no company that runs this landfill should be a limited liability company. CCL needs to be bonded</b></p>	49-56
11.9.2.4	Odor Impacts	<p>DEIR States: As discussed under Impact AQ-10, CCL employs a comprehensive approach to controlling odors by employing numerous odor control measures. When the Newhall Ranch development has been constructed, additional sensitive receptors will be located near the CCL site boundaries. CCL will continue to implement current operational practices associated with odor control; therefore cumulative odor-related impacts are expected to be less than significant.</p> <p><b>Please update all machinery, practices, and sand used to align with county landfills and all the newest current machinery being used today.</b></p>	49-57
11.9.3	Mitigation Measure Required for Cumulative Impacts.	<p>DEIR States: Impacts have been mitigated to the extent feasible through the implementation of Project Design Measures. Therefore, additional mitigation measures have not been identified</p> <p><b>Not all mitigation measures have been taken. Please establish a Val Verde</b></p>	49-58

		<p><b>Community Advisory Committee that will listen to the concerns of the residents, not just defend CCL. The board should have equal members, if the landfill has a non-voting person to represent them on the board then Val Verde should have a non-voting member, so should live oak as their Cancer Rate will be more than significant. Corrective steps need to be taken by the VVCAC board and the landfill. Residents should be able to have transportation provided since the meetings are far away from the residents.</b></p>	49-58 cont'd
Chapter 12		<p><b>The residents near CCL are oppose to sludge of any kind, but especially the definition of sludge used by all landfills. The residents are also opposed to radioactive material being allowed at CCL, along with hazardous waste to include Rockydine dirt.</b></p>	49-59
12.2.1.1	Emission Calculation Methodology	<p>DEIR States: Construction Emissions Short-term emissions of GHGs would be generated from construction activities including site preparation, road construction, foundation construction, and excavation. During onsite construction, activities are assumed to occur for 5 days per week, or 20 days per month.</p> <p>The Proposed Project would include best management practices (BMP), required by state and local regulations, to reduce air pollutant emissions during construction; some BMPs will also reduce GHGs. Therefore, the following emission reductions were included in the unmitigated construction GHG emissions to account for implementation of BMPs:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Equipment and vehicle idling time would be minimized.</li> <li><input type="checkbox"/> Equipment and vehicles would be maintained according to manufacturer's written emission-related instructions.</li> </ul> <p>Construction Exhaust Emissions CO<sub>2</sub> emissions from construction equipment exhaust were estimated using South Coast Air Quality Management District (SCAQMD) OFFROAD 2007 emission factors. Though CARB has released an updated version of the OFFROAD model, OFFROAD 2011, it was not used for this analysis as it provides inventory level emissions rather than equipment-specific emission factors. The construction equipment exhaust emissions, as well as emissions from trucks used for routine maintenance activities, were considered onsite emission sources, while worker commutes were considered offsite emission sources. CO<sub>2</sub> and CH<sub>4</sub> emissions from on-road vehicle exhaust emissions were estimated using EMFAC2011 average emission factors for the SCAQMD. It was assumed that maintenance trucks would travel 5 miles per day onsite and that each employee would commute a distance of 40 miles roundtrip per day. Detailed vehicle exhaust emission calculations are included in Appendix H.</p> <p><b>Please clarify the steps the landfill will be using to ensure that idling time is minimized. Please clarify how the procedures the landfill has in place to limit idling time for Diesel trucks backed up on Highway 126 and on the Interstate 5 corridor. Since trucks are idling outside the landfill now it would be safe to assume a new plan of action has been drafted.</b></p> <p><b>Please clarify and list the manufacturer's written emission-related instructions for all equipment that CCL is referring to.</b></p>	49-60

		<p><b>CONSTRUCTION EXHAUST EMISSIONS</b>  <b>Please clarify and recalculate to include the diesel travel from origin of load pick up, to landfill land back to origin of pick up, making sure to include trucks that travel from as far as Sacramento or Victorville. Please refactor using CARB update and compare the new figures to the previous figures. Please use more than one formula for on road vehicle exhaust emissions.</b></p>	
12.2.1.2	Operational Emissions	<p>DEIR States:  GHGs would be generated over the long term from operation of the Proposed Project. Operational emissions would include routine landfill maintenance activities, worker commute trips, haul truck trips, fugitive landfill gas (LFG), LFG flares operated onsite, and electricity used to power onsite support facilities. Onsite and offsite GHG operation emissions were divided into four categories: vehicle exhaust, stationary source exhaust, fugitive LFG, and consumption of purchased electricity. Operations at the landfill are assumed to occur 6 days per week, for a total of 312 days per year.</p> <p>The Proposed Project would include BMPs, required by state and local regulations, to reduce emissions during operation. Therefore, the following emission reductions were included in the unmitigated operation GHG emissions to account for implementation of BMPs:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Equipment and vehicle idling time would be minimized.</li> <li><input type="checkbox"/> Equipment and vehicles would be maintained according to manufacturer’s written emission-related instructions.</li> </ul> <p>Mobile Source Exhaust Emissions  CO<sub>2</sub> emissions from off-road diesel equipment exhaust were estimated using SCAQMD OFFROAD 2007 emission factors. Though CARB has released an updated version of the OFFROAD model, OFFROAD 2011, it was not used for this analysis as it provides inventory level emissions rather than equipment-specific emission factors. CO<sub>2</sub> and CH<sub>4</sub> emissions from on-road vehicle exhaust were estimated using EMFAC2011 average emission factors for the SCAQMD. Trucks used for routine maintenance activities were considered onsite emission sources while worker commutes were considered offsite emission sources. Waste trucks travel both onsite and offsite. It was assumed that service trucks would travel 5 miles per day onsite, that waste trucks would travel 6 miles per day offsite and 4 miles per day onsite with an idling time of 3.5 minutes, and that each of the 25 onsite employees would commute a distance of 40 miles roundtrip per day. Detailed vehicle exhaust emission calculations are included in Appendix H.</p> <p>Stationary Source Exhaust Emissions  CCL currently operates two onsite LFG flares. As part of the Proposed Project, two additional flares will be installed; the first in 2021 and the second in 2030. CO<sub>2</sub> emissions from the Proposed Project flares were estimated based on an emission factor taken from The Climate Registry’s (TCR) General Reporting Protocol (TCR, 2014). Facility data indicate that, on average, 85 percent of LFG generated is recovered and combusted in the flares or existing onsite landfill gas-to-energy (LFGTE) plant. While the majority of the LFG collected is expected to go to the LFGTE plant instead of the flares, emissions from</p>	<p>49-60 cont'd</p> <p>49-61</p>

	<p>combustion of LFG in the flares would be higher. Therefore, it was conservatively assumed that 85 percent of future LFG generated would be combusted by the flares. A flare destruction efficiency of 99 percent was assumed, as required by CARB (17 CCR 95464[b][2][A][1]). Detailed stationary source exhaust emission calculations are included in Appendix H.</p> <p>Calculations of stationary source emissions assuming all gas is burned in the flares are conservative. While a significant fraction of the gas will be burned for beneficial use in the LFGTE plant, combustion efficiency in the gas turbines would significantly exceed the 99 percent required for flares. Therefore, because combustion in the turbine would result in less unburned methane than estimated for the flares, the overall GHG impact must be less than estimated here.</p> <p><b>Fugitive Landfill Gas Emissions</b>  Fugitive LFG emissions would result from the aerobic decomposition of organic waste and the anaerobic bacterial digestion of buried waste. Facility data indicate that, on average, 85 percent of LFG generated is combusted in the flares, therefore 15 percent of LFG generated would be emitted as fugitive CO<sub>2</sub> and CH<sub>4</sub>. Detailed fugitive LFG emission calculations are included in Appendix H.</p> <p>Note that the CO<sub>2</sub> released either as fugitive emissions, or from the capture and combustion of landfill gas, is considered biogenic because it results from the decomposition of biologically-based material. Biogenic CO<sub>2</sub> is commonly accepted to be of negligible or “net zero” climate impact, since it results from carbon recently removed from the atmosphere by biologic activity, as compared to the carbon in fossil fuels which has been stored in geologic formations for thousands of years. Nonetheless, in accordance with SCAQMD procedures, biogenic CO<sub>2</sub> is included in the significance determinations for the proposed project.</p> <p><b>Emissions from Consumption of Purchased Electricity</b>  Operation of the Proposed Project would require the use of electricity generated by the onsite LFGTE plant, offsite power plants and other electricity generating facilities. It is expected that the LFGTE plant would generate the majority of the electricity needed for operation, however emissions from power generated offsite would be higher, therefore calculations were performed assuming all power used would be generated offsite. Indirect GHG emissions associated with electricity generation were calculated using emission factors from EPA eGRID Ninth Edition, Version 1.0 (2010 data) for the Western Electricity Coordinating Council California subregion (EPA, 2014b). Future emission factors are not available; therefore, the latest available emission factors were used to calculate emissions for all years of operation.</p> <p>Increased electricity use associated with the Proposed Project would include electricity used to power new blowers. Electricity usage per year is based on the number of new blowers in operation, motor hp, assumed motor efficiency of 90 percent, and the assumption that the blowers would operate 24 hour per day, 365 days per year. Electricity used to power landfill facilities, including offices, scale house, scales, and site lighting is not expected to increase due to operation of the Proposed Project, therefore emissions were not calculated for those</p>
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		<p>sources.</p> <p><b>Please use both graphs for traffic the one that gives an A grade and the one that gives an F grade. Since the F grade has trucks idling far from the landfill as they are stuck in the backup of traffic it would be wise to recalculate. Please recalculate for worst scenario as well as for the best. The F grade was a much newer graph, taking into account the population growth of recent years and would be much more accurate and honest in its figures then the one presented by CCL.</b></p> <p><b>Mobile Source Exhaust Emissions</b>  <b>Please recalculate using CARB’s updated version of the OFFROAD model. Please clarify how waste trucks will travel off site 6 miles per day when CCL will be taking in 12 thousand tons a day. Please clarify where the trucks traveling off site will be traveling too. Please clarify if the 12,000 tons daily would be coming from Santa Clarita, which itself is more than 6 miles away. Please clarify why the idling time is 3.5minutes in section 12.2.1.2, but in chapter 11 it is 2 minutes.</b></p> <p><b>Mobile Source Exhaust Emissions.</b>  <b>Please recalculate exhaust levels using updated CARB versions.</b></p> <p><b>Stationary source exhaust emissions</b>  <b>Please clarify how much 85% percent of LFG will be daily. Please clarify if the flares release any fine particles of LFG or any other pollutants into the air. Please clarify as to why less methane being burned, which would result in more Methane than estimated would result in an overall GHG impact less than estimated.</b></p> <p><b>Fugitive Landfill Gas Emissions</b>  <b>Please clarify the 15 percent of LFG generated would be emitted as fugitive CO<sub>2</sub> and CH<sub>4</sub>; what amount would that be daily. Please clarify the amount of CO<sub>2</sub> and CH<sub>4</sub> is now released daily.</b></p> <p><b>Emissions from Consumption of Purchased Electricity</b>  <b>Please clarify how the Landfill will be using the same electricity but will be running more hours.</b></p>
12.3.2	State Regulations and Standards	<p>DEIR States:  California Regulations. Assembly Bill (AB) 1493, requiring the development and adoption of regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by noncommercial passenger vehicles, light duty trucks, and other vehicles used primarily for personal transportation in the state was signed into law in September 2002 by Governor Davis. Governor Schwarzenegger issued Executive Order S-3-05 in 2005, which established statewide GHG emissions reduction targets. Executive Order S-3-05 provides that GHG emissions shall be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent of 1990 levels by 2050 (CAT, 2006).</p> <p>In response to Executive Order S-3-05, the CalEPA created the CAT, which, in March 2006, published the Climate Action Team Report (the “2006 CAT Report”). The 2006 CAT Report identifies a recommended list of strategies that the state could pursue to reduce GHG emissions. These strategies could be</p>

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	<p>implemented by various state agencies, within their existing authority, to ensure that the governor’s targets are met. The strategies include, but are not limited to: reduction of passenger and light duty truck emissions, reduction of idling times for diesel trucks, overhaul of shipping technology and infrastructure, increased use of alternative fuels, increased recycling, and increased landfill CH<sub>4</sub> capture.</p> <p>AB 32, the “California Global Warming Solutions Act of 2006,” was signed into law in the fall of 2006. AB 32 established the goal of reducing GHG emissions to 427 MMT CO<sub>2</sub>e per year by 2020. When signed, AB 32 directed CARB to begin developing discrete early actions to reduce GHG emissions while also preparing a scoping plan to identify how to reach the 2020 emissions cap. Major milestones of AB 32 are outlined below:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> By January 1, 2009, CARB adopted a plan indicating how emission reductions would be achieved from significant sources of GHG via regulations, market mechanisms (most notably, the Cap-and-Trade program), and other actions.</li> <li><input type="checkbox"/> During 2009, CARB staff drafted rule language to implement its plan and held a series of public workshops on each measure (including market mechanisms).</li> <li><input type="checkbox"/> On January 1, 2010, early action measures took effect.</li> <li><input type="checkbox"/> During 2010, CARB conducted a series of rulemakings to adopt GHG regulations, including rules governing market mechanisms.</li> <li><input type="checkbox"/> In January 2011, CARB completed major rulemakings for reducing GHG emissions, including market mechanisms.</li> <li><input type="checkbox"/> In January 2012, GHG rules and market mechanisms were adopted by CARB and became legally enforceable.</li> <li><input type="checkbox"/> On November 14, 2012, the first auction of GHG allowances was held.</li> <li><input type="checkbox"/> On January 1, 2013, enforceable compliance obligations under the Cap-and-Trade program began for Phase 1 covered sectors.</li> </ul> <p>The Cap-and-Trade program is an element of AB 32 that covers major sources of GHG emissions in California, including power plants, industrial facilities, and transportation of fuels. The Cap-and-Trade Regulation (17 CCR 95801-96022) includes an enforceable GHG cap that declines over time. Each quarter, CARB auctions allowances, which are tradable permits, equal to the emission allowed under the cap. The Proposed Project would not be subject to the Cap-and-Trade regulation as emissions from biomethane and biogas produced by landfills do not have a compliance obligation (17 CCR 95852.2[a][8][B]).</p> <p>As part of AB 32, GHG emissions reporting is required for industrial facilities; suppliers of transportation fuels, natural gas, natural gas liquids, liquefied petroleum gas, and CO<sub>2</sub>; operators of petroleum and natural gas systems; and electricity retail providers and marketers. The California GHG mandatory reporting rule was originally approved in 2007 and revised in 2010, 2012, and 2013. The current regulation became effective January 1, 2014. The Proposed Project is subject to the California GHG mandatory reporting rule.</p> <p>The Landfill Methane Control Measure regulation, a discrete early action GHG reduction measure as described in AB 32, became effective in June 2010. The regulation is designed to reduce methane emissions from Municipal Solid Waste (MSW) landfills and differs from federal regulations and local air district</p>
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	<p>rules in that the focus is generally on methane rather than on non-methane organic compounds (NMOCs), it applies to smaller landfills (in addition to larger landfills), and has more stringent requirements for methane collection and control, component leak testing, and surface emissions monitoring.</p> <p>The regulations for MSW landfills require the installation and proper operation of an LFG collection and control system if the landfill is active, inactive, or closed and has a minimum of 450,000 tons of waste-in-place, if it received waste after January 1, 1977, if the landfill gas is currently uncontrolled, and the landfill gas heat input capacity is greater than 3.0 MMBtu/hr. If a landfill can demonstrate that the landfill gas heat input capacity is less than 3.0 MMBtu/hr then it may be exempt. The ARB has a simple modeling tool on their website for calculating the heat capacity  <a href="http://www.arb.ca.gov/cc/landfills/landfills.htm">http://www.arb.ca.gov/cc/landfills/landfills.htm</a>.</p> <p>However, landfill owners or operators with existing gas collection and control systems are not required to submit plans or install new collection and control systems. If required, a control system must be in place within 18 months of approval of the design and it must achieve 99 percent reduction of methane for most control devices (i.e. flares). The 99 percent destruction efficiency does not apply to lean burn internal combustion engines. They must reduce the outlet methane concentration to less than 3,000 ppmv.</p> <p>Ongoing monitoring requirements exist to ensure the collection and control system is maintained and operated in a manner to minimize methane emissions. Surface emission monitoring must be performed quarterly to make sure methane emissions are adequately controlled. Instantaneous and integrated (averaged) surface methane concentrations must not exceed 500 ppmv and 25 ppmv, respectively. Under certain conditions, surface monitoring may be performed on an annual basis. In addition, the combustion temperature of the enclosed combustion device (i.e., flare) must be equipped with a continuous monitor.</p> <p>Executive Order S-01-07 was enacted by Governor Schwarzenegger on January 18, 2007. The order mandated that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. The Low Carbon Fuel Standard (LCFS) regulations were finalized on February 1, 2010 and amended in December 2011. An enforcement injunction was placed on the LCFS in December 2011, but it was lifted April 24, 2012. As such, the LCFS regulations are currently in effect.</p> <p>Senate Bill (SB) 97, signed in August 2007, acknowledged that climate change is an important environmental issue that requires analysis under CEQA. This bill directed the California Office of Planning and Research (OPR) to prepare, develop, and transmit to the Natural Resources Agency guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions by July 1, 2009.</p> <p>In response to SB 97, OPR submitted its recommended amendments to the CEQA Guidelines for addressing GHG emissions to the Secretary for Natural Resources on April 13, 2009. Those recommended amendments were developed to provide guidance to public agencies regarding the analysis and mitigation of GHG emissions and the effects of GHG emissions in draft CEQA</p>
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	<p>documents. The amendments were adopted by the Natural Resources Agency on December 30, 2009, and became effective on March 18, 2010.</p> <p>SB 375, signed in August 2008, required the inclusion of sustainable communities' strategies in regional transportation plans for the purpose of reducing GHG emissions. The bill required CARB to appoint a Regional Targets Advisory Committee by January 31, 2008, and required this committee to recommend factors to be considered and methodologies to be used for setting GHG reduction targets by December 31, 2009. Final reduction targets were established in February 2011. Santa Clarita is incorporated in the SCAG reduction targets set at an 8 percent reduction of GHG emissions relative to 2005 by 2020, and a 13 percent reduction relative to 2005 by 2035.</p> <p>CEQA Requirements. GHG emissions contributing to GCC have only more recently been addressed in CEQA documents, such that CEQA and case law do not provide any time-tested guidance relative to their assessment. On October 24, 2008, CARB released a preliminary draft staff proposal titled "Recommended Approaches for Setting Interim Significance thresholds for GHGs under CEQA." This document proposed a significance threshold of 7,000 metric tons of CO<sub>2</sub>e per year (MTCO<sub>2</sub>e/yr) for industrial projects. Projects exceeding this threshold are presumed to have significant impacts related to climate change and must prepare an EIR and implement all feasible mitigation. Impacts associated with the Proposed Project are discussed in Section 12.6, and mitigation measures are discussed in Section 12.7.</p> <p>As previously discussed, amendments to the CEQA Guidelines for addressing GHG emissions were adopted on December 30, 2009, and became effective on March 18, 2010. The amended guidelines do not establish quantitative thresholds but instead provide qualitative thresholds for comparison. Similarly, the California Air Pollution Control Officers Association (CAPCOA) issued a white paper, titled CEQA and Climate Change, to assess GHG emissions in January 2008. CAPCOA has not made any recommendations for use of any specific methodology in its white paper (CAPCOA, 2008). CAPCOA later released a report titled Quantifying GHG Mitigation Measures, to provide a common platform of information and tools to support local governments in August 2010. This report does not provide policy guidance or advocate any policy position related to GHG emission reduction (CAPCOA, 2010).</p> <p>CARB Interim Significance Thresholds for GHGs under CEQA. In order to provide guidance to local lead agencies on determining the significance of GHG emissions identified in CEQA documents, the CARB staff have recommended a threshold for new industrial projects to be subject to CEQA's requirement to impose feasible mitigation. If a project exceeds this threshold, then it is considered significant and must implement all feasible mitigation. The project must also meet CARB interim performance standards for construction and transportation emissions. In addition, projects should comply with AB 32 GHG reduction goals, include emissions estimates agreed upon by CARB, have been analyzed under CEQA, and have a certified Final CEQA document. Impacts and mitigation measures associated with the Proposed Project are discussed in Sections 12.6 and 12.7, respectively.</p> <p>City of Santa Clarita CAP. There is no adopted GHG Reduction Plan or</p>
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		<p>applicable strategy for the County of Los Angeles at the present time. However, the City of Santa Clarita adopted a CAP in August 2012. Section 4.2 of the CAP identifies GHG mitigation measures relating to solid waste diversion, energy usage, transportation, water, and vegetation. The solid waste diversion measures are aimed to limit the amount of waste sent to landfills, and are not applicable to the construction and operation of landfills. None of the mitigation measures presented in the CAP is directly applicable to the Proposed Project; however they do include many of the interim performance standards developed by CARB.</p> <p>SCAQMD Landfill Rule. The purpose of SCAQMD Rule 1150.1 is to reduce emissions from MSW landfills. The rule incorporates and clarifies many federal landfill emission regulations (40 CFR) and California regulations (AB 32). The rule requires that an LFG collection and control system reduce CH<sub>4</sub> emissions by 99 percent and NMOC emissions by 98 percent or reduce outlet NMOC concentration from to less than 20 ppm. It also includes requirements for flares and LFG collection systems, as well as sampling and monitoring requirements for landfills.</p> <p><b>Please provide the documentation for CCL that will demonstrate that the landfill gas heat input capacity is less /more than 3.0 MMBtu/hr.</b>  <b>Please list CCL's current collection and control system; please include the level of current methane levels in percentages. Please clarify when and why methane levels were higher then what is allowed over the last ten years.</b>  <b>CARB Interim Significance Thresholds for GHGs under CEQA</b>  <b>Please list the procedures CCL's and current plans to achieve feasible mitigation in the event that CCL exceeds the recommended threshold.</b>  <b>SCAQMD Landfill Rule</b></p> <p><b>Please provide the current levels of CH<sub>4</sub> and NMOC emissions and to what percent they have been reduced in the LFG collection and control system.</b></p>
12.5.1	Landfill Gas Surface Emissions	<p>DEIR States:  As part of landfill operation, gas wells and pipelines are installed to capture the LFG generated by the decaying solid waste. Initially, the LFG is mostly CO<sub>2</sub>. As the buried waste ages, the available oxygen decreases and anaerobic conditions are created, producing CH<sub>4</sub>, a powerful GHG.</p> <p>The collected gas is monitored to be sure that the collection system is collecting LFG without drawing in ambient air. The collected gas is combusted in either the LFGTE plant or a flare, which converts CH<sub>4</sub> into CO<sub>2</sub>. Two LFG flares, each with a capacity of 4,000 standard cubic feet per minute, are currently in operation.</p> <p>The gas wells and pipelines collect an average of 85 percent of the LFG produced, and about 15 percent of the gas generated in the landfill escapes as fugitive emissions. Several actions are taken to minimize these emissions:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Gauge pressure is negative at the gas extraction well.</li> <li><input type="checkbox"/> Nitrogen and oxygen concentrations are monitored to minimize excess air infiltration.</li> <li><input type="checkbox"/> LFG temperatures at the gas extraction wells are monitored to limit the potential for subsurface fires.</li> </ul>

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		<p><input type="checkbox"/> CH<sub>4</sub> concentrations across the entire landfill surface are monitored to prevent seeping of CH<sub>4</sub> gas from the landfill surface.</p> <p>In addition to the emission sources described above, CCL has an equipment maintenance facility. Additionally, CCL intends to resume a composting operation, previously active from 1997 to 2009, in some manner in the future.</p> <p><b>Please provide the current level of CH<sub>4</sub> being produced at CCL, if not able to provide the current level then please give best estimate.</b></p> <p><b>Please clarify how gas escapes the landfill in a quantitate amount; 15 percent of the gas generated in the landfill is much too vague.</b></p> <p><b>Please clarify at what levels Nitrogen and oxygen concentrations are at now; please list the steps, procedures, personal, and equipment that measure Nitrogen and Oxygen along with the level of accuracy.</b></p> <p><b>Please list the procedures taken if the LFG temperatures at the gas extraction wells are found to be too high for safety.</b></p> <p><b>Please list steps and procedures that is in place once CH<sub>4</sub> has been found to be seeping from the surface.</b></p> <p><b>Please clarify the composting operation and where that was found in the Odor section in chapter 11. Please include an odor plan for the composting operation. Please describe what an equipment maintenance facility is capable of when it comes to day to day activities at the landfill.</b></p>	49-63 cont'd
12.5.2	Mobile Source Emissions	<p>Mobile tailpipe exhaust emissions are generated during operation of the landfill by the following activities:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Onsite service trucks and heavy equipment</li> <li><input type="checkbox"/> Collection trucks, transfer trucks, and passenger vehicles that deliver various waste materials</li> <li><input type="checkbox"/> Passenger vehicles associated with landfill employee commuting</li> </ul> <p><b>Please include the impact of the mobile tailpipe exhaust emissions generated from onsite service trucks, heavy equipment, collection trucks, transfer trucks, passenger vehicles that deliver various waste materials, and passenger vehicles associated with landfill employee commuting; please make sure to factor these into related areas from chapter 11. Chapter 11 seems to be missing much of these things.</b></p>	49-64
12.6.3.1	Construction Emissions – Project Impact Discussion	<p>DEIR States: Project Impact Discussion. The Proposed Project will be developed in phases with cell development in each phase, occurring over the life of the Proposed Project. Grading and site preparation associated with each subsequent phase of the Proposed Project would occur prior to the fill of the previous cell. Emissions from these activities are temporary. Preparation of new cells would occur as needed, and construction emissions from preparation of each new cell would be generally similar.</p> <p>The Proposed Project would emit GHGs primarily from direct sources (combustion of fuels from employee vehicles and construction equipment).</p>	49-65

		<p>Emissions from the combustion of fuel from construction equipment and associated employee vehicles were estimated per the methodology described in Section 12.2. GHG emissions during construction would equal approximately 2,961 tons (2,687 metric tons) per year of CO<sub>2</sub>e. Table 12-2 shows the estimated construction-related emissions.</p> <p><b>Proposed project impacts.</b>  <b>Please clarify; the project will generate construction-related GHG emissions, but the emissions are not included in the 7,000-MTCO<sub>2</sub>e/yr threshold and would not hinder or delay California's ability to meet the reduction targets contained in AB 32. This would seem deceptive; since CCL is included in AB 32 then the GHG's should be added to California's overall GHG emissions. Please calculate the GHG's expected to be present for this particular project.</b></p>	49-65 cont'd
Table 12-2		<p>Please See Table 12-2  Total Estimated Landfill Construction Greenhouse Gas Emissions (tons per year)<sup>a,b</sup></p> <p><b>It is clear that trucks and cars carrying loads to and from the landfill are missing from table 12-2: Please factor trucks and cars along with their estimated distance traveled and exhaust that would be released into the atmosphere and make sure that Table 12-2 represents all vehicles.</b></p> <p><b>Please clarify and list the dangers of GHG to the nearby communities due to the concentration within and near the landfill. Please compare it with any tables from EPA and from SCAQMD.</b></p>	49-66
12.6.3.2	Operational Emissions	<p>DEIR States:  Impact GHG-2: Operation of the Proposed Project would result in the generation of GHG emissions from energy use, onsite equipment exhaust, fugitive emissions of LFG, combustion of LFG, and disposal truck/worker vehicle trips. Based on the detailed analysis herein, the GHG emissions from the Proposed Project, excluding construction and transportation emissions, would exceed the 7,000-MTCO<sub>2</sub>e/yr significance threshold. Therefore, GHG emissions resulting from the operation of the Proposed Project would be significant.</p> <p>Project Impact Discussion. Operational, or long-term, GHG emissions will occur over the life of the Proposed Project. The sources of operational emissions include energy use, onsite equipment exhaust, LFG generation and flaring, and disposal vehicle and other transportation emissions. Each of these emissions sources are discussed in greater detail below.</p> <p>In accordance with CARB interim thresholds for GHG emissions, the equipment exhaust will not be included in the evaluation of the operational emissions impact. The Proposed Project incorporates the CARB interim performance standards for construction and transportation.</p> <p>Onsite Energy Use. Operational emissions of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O associated with onsite energy use by new blowers were quantified per the methodology described in Section 12.2. Detailed indirect electricity emission calculations are included in Appendix H.</p>	49-67

	<p>The generation of electricity through combustion of fossil fuels yields CO<sub>2</sub>, as well as lesser amounts of CH<sub>4</sub> and N<sub>2</sub>O. These emissions are considered indirect because the Proposed Project would not generate the electricity but merely consume purchased electricity that is generated elsewhere. Table 12-3 shows the estimated operational emissions of GHGs associated with electricity consumption from the Proposed Project.</p> <p>Onsite Equipment Emissions. Additional heavy equipment proposed for regular onsite use includes three bulldozers, three compactors, two scrapers, one water truck, one water wagon, three trailer mounted light plants, and two tippers. Light duty cars and trucks are also expected to be regularly used onsite at the landfill. For the purpose of this analysis, it was assumed that onsite equipment would be operated for as much as 12 hours per day. It should be noted, however, that it is unlikely that all onsite equipment would be used simultaneously beginning from the first day of landfill operations. Therefore, this analysis represents a reasonable worst case scenario for potential emissions impacts. GHG emissions were calculated per the methodology described in Section 12.2. The results of this analysis are summarized in Table 12-4.</p> <p>Landfill Gas Emissions. LFG results from the anaerobic decomposition of organic materials within a landfill. LFG is principally composed of CH<sub>4</sub> and CO<sub>2</sub> but also includes nonmethane organics, reactive organic compounds, sulfur compounds, and a variety of other air pollutants as discussed in Chapter 11.0, Air Quality. The existing facility operations include a LFG containment system, which spans the extent of the landfill to limit emissions into the atmosphere and prevent subsurface migration of LFG to adjacent properties. According to the Landfill Gas Report by Golder Associates (the Golder Report), methane content in the LFG at CCL is 50 percent by volume (Golder, 2011). CO<sub>2</sub> content was conservatively assumed to be 50 percent for this analysis.</p> <p>The Golder Report (2011) determined that estimated LFG recovery is 85 percent using EPA LandGEM Model Version 3.02. LFG emissions of N<sub>2</sub>O are given a value of 0 grams per standard cubic foot by CARB (CARB, 2011b). Therefore, negligible N<sub>2</sub>O emissions would result from LFG. Total CH<sub>4</sub> and CO<sub>2</sub> emissions from fugitive LFG emissions, conservatively assuming 85 percent recovery, are shown in Table 12-5.</p> <p>Flaring Emissions. Emissions would be generated by flaring of collected LFG. CO<sub>2</sub> emissions from flaring were calculated based on source testing and projected LFG generation. Detailed flaring emission calculations are included in Appendix H. Table 12-6 shows the estimated operational flaring emissions, conservatively assuming 85 percent recovery of LFG and a flare destruction efficiency of 99 percent. As noted above, from a GHG accounting perspective, it is conservative to assume that all gas is combusted in flares at this efficiency versus with the higher destruction efficiency achieved in gas turbines in the LFGTE plant.</p> <p>Disposal Vehicle/Transportation Emissions. Emissions would be generated by heavy duty trucks transporting refuse to the landfill, as well as recycling and other trucks, and employee and vendor vehicles. In accordance with CARB interim thresholds for GHG emissions, the vehicle exhaust will not be included in the evaluation of the operational emissions impact. The Proposed Project</p>
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	<p>incorporates the CARB interim performance standards for transportation for all vehicles in the project proponent's control.</p> <p>Emissions were calculated per the methodology described in Section 12.2. Table 12-7 shows the estimated mobile emissions of GHGs.</p> <p>Subsequent Phase Preparation. As discussed above, the Proposed Project is to be constructed over time in phases, and grading and site preparation associated with these phases would occur prior to the fill of the previous cell. Preparation of a new cell would occur as needed, depending on the duration of each operational phase. GHG emissions from these temporary activities would occur during operation of the landfill and be included as construction impacts. Therefore, in accordance with the CARB interim guideline, emissions from cell construction are not being included in operational GHG calculations. In order to provide a comprehensive estimate of these construction emissions, emissions associated with a prospective phase are included in Table 12-2.</p> <p>Combined Operational Emissions for Comparison to the Threshold. Table 12-8 combines all of the applicable sources of GHG emissions associated with the operation of the Proposed Project to be compared with the CARB interim threshold, which total approximately 409,166 MTCO<sub>2</sub>e/yr. Per CARB, this total excludes construction and transportation emissions. This total represents roughly 0.09 percent of California's total 2009 emissions of 457 MMT. These emissions projections indicate the majority of the Proposed Project's potential GHG emissions are associated with LFG.</p> <p>Project-Level Significance Determination. The GHG emissions from applicable sources associated with the Proposed Project are estimated to equal approximately 409,166 MTCO<sub>2</sub>e/yr. The impacts of the Proposed Project exceed the CARB significance threshold; therefore, the Proposed Project impacts would be significant.</p> <p>Project Design Elements that Avoid or Reduce Impacts. Appendix B of CEQA and Climate Change (CAPCOA, 2008) identifies mitigation measures and the corresponding reductions in GHG emissions and a range of percentage reductions for a variety of categories including bicycles, pedestrian pathways, parking, design, mixed-use, energy, and construction features. The ranges are indicative of the GHG emission reductions corresponding to each of the features, from a numerical low to high (CAPCOA, 2008). Similarly, Chapter 7 of Quantifying Greenhouse Gas Mitigation Measures provides mitigation fact sheets for certain industries, including solid waste. The fact sheets include a list of mitigation measures and their associated GHG emission reductions (CAPCOA, 2010). The existing landfill facility and the Proposed Project both include an LFGTE plant, which is an emissions reduction measure comparable to mitigation measures recommended in the CAPCOA White Paper and report.</p> <p>LFG will continue to be actively managed using a comprehensive LFG collection and removal system as required by federal and state regulations.</p> <p>Carbon "Sink" and Sequestration. Emissions of GHGs from fuel use and organic matter decomposition is an inevitable consequence of management of the solid waste produced by society. It must be acknowledged, however, that</p>
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	<p>the disposal of waste in landfills also causes substantial amounts of carbon to be removed from the carbon cycle and permanently sequestered.</p> <p>Ownership of the sequestration benefits is a complex topic that EPA and other organizations have not attempted to solve. The waste materials are abandoned by their owners, however, and disposed of in the landfill. This discussion considers the carbon sequestration in the landfill, which may prospectively be an offset claimed against the landfill emissions.<sup>1</sup></p> <p>Nonetheless, EPA, IPCC, and CEC all recognize landfills as carbon sinks and quantify such storage in national and state-wide GHG budgets. For example, in the recent Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2012 (EPA, 2014c), EPA provides methodology and results for carbon storage via disposal of food scraps and yard trimmings in landfills. The document is clear that the attempt is not to only quantify storage for these waste types; rather, these are specifically identified because other waste types are accounted in other portions of the budget: “Carbon storage estimates are associated with particular land uses. For example, harvested wood products are accounted for under Forest Land Remaining Forest Land because these wood products are considered a component of the forest ecosystem. The wood products serve as reservoirs to which C resulting from photosynthesis in trees is transferred, but the removals in this case occur in the forest.”</p> <p>The IPCC approach is similar in the 2006 Guidelines for National Greenhouse Gas Inventories (IPCC, 2006). Volume 5 of the guidelines covers waste including carbon stored in solid waste disposal sites (SWDS). “Some carbon will be stored over long time periods in SWDS. Wood and paper decay very slowly and accumulate in the SWDS (long-term storage). Carbon fractions in other waste types decay over varying time periods (see Half-life under Section 3.2.3.). The amount of carbon stored in the SWDS can be estimated using the [first order decay] model (see Annex 3A.1). The long-term storage of carbon in paper and cardboard, wood, garden and park waste is of special interest as the changes in carbon stock in waste originating from harvested wood products which is reported in the AFOLU volume (see Chapter 12, Harvested Wood Products).”</p> <p>Finally, the 2006 Inventory of California GHG Emissions and Sinks (CEC, 2006) is also similar. CEC indicates that, “Lumber and urban wood wastes disposed at landfills contain significant amounts of lignins, which contain carbon, which is sequestered in anaerobic landfills.” Quantification of storage for wood products and other organics was included in the inventory.</p> <p>Unfortunately, none of these methodologies is adequate for analysis of site-specific carbon balance. Again, the purpose for all three was to produce national or state-wide GHG inventories without assigning emissions to particular locations. Thus, comprehensive analysis of landfill storage using these references would require combining procedures from multiple sections, including the noted landfill discussions, and in particular also portions of Agriculture, Forestry, and Other Land Use (AFOLU) analyses.</p> <p>Perhaps the most comprehensive reference which could be applied for site-specific analysis is the “Current MSW Industry Position and State-of-the-</p>
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	<p>Practice on LFG Collection Efficiency, Methane Oxidation, and Carbon Sequestration in Landfills” produced by SCS Engineers on behalf of the Solid Waste Industry for Climate Solutions (SCS Engineers, 2008). In this document, the authors present recommended procedures for analysis of carbon storage in landfills, combining data from EPA, IPCC, various researchers, and other sources. Estimates are presented regarding content and long term storage of carbon for individual and combined waste streams.</p> <p>Using this methodology, SCS Engineers has estimated the amount of carbon sequestered in the landfill from waste disposal operations in the landfill extension. Utilizing average waste composition factors established by CalRecycle (successor to the California Integrated Waste Management Board), SCS has determined that over the estimated landfill expansion life, CO<sub>2</sub>e stored in the landfill is approximately 21.6 million tons, a substantial quantity (SCS Engineers, 2008, 2014; see Appendix H).</p> <p>Additional Mitigation Measures Required Through the CEQA Process. Required mitigation strategies such as the LFG collection system are in place and will continue to operate. Additional mitigation techniques are presented in Section 12.7.</p> <p>The CARB interim threshold guidelines require the implementation of all feasible mitigation measures. Mitigation measures to reduce the emissions of GHGs are listed below.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Idling of heavy duty hauling trucks and off-road mobile sources of any type in excess of 5 minutes, will be restricted.</li> <li><input type="checkbox"/> When supplemental landfill equipment is purchased, new commercially available equipment will be purchased that meets or exceeds California’s emission standards in effect at the time of purchase.</li> <li><input type="checkbox"/> Onsite vehicles and equipment will be properly maintained per manufacturer’s specifications.</li> </ul> <p>In addition to the above measures, within 3 years of final project permitting, the applicant will submit a GHG Reduction Plan that investigates the feasibility of additional GHG reduction measures the Proposed Project could implement to achieve additional reductions in annual GHG emissions. CARB interim performance standards and any future requirements SCAQMD may promulgate will be considered in the Plan, together with the landfill facility’s evaluation of sequestered tons.</p> <p><b>Impact GHG-1:</b>  <b>Please clarify as to why the significance is not listed in the tables in chapter 11. Please recalculate cancer risk and readjust figures compared to SCAQMD table making sure to include the significant emissions from GHG that was lacking in chapter 11. Please ensure the CCL is bonded and no longer is a limited liability company; to not ensure will hold the county accountable to the law suits due to increased health dangers.</b></p> <p><b>To not include equipment exhaust in the evaluation of the operational emissions impact is deceptive at best. Make sure to include exhaust in the evaluation of the operational emissions and add that to the cancer risk</b></p>
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		<p>rates in chapter 11. The fact that these are not factored in is misleading the nearby neighbors into a false sense of security. Chapter 11 says cancer rate will be in the 5's which is well below the 10's, but in reality it will be well above the 10's; to deny this is fraudulent. Please inform Val Verde and nearby residents for how long this practice has been occurring.</p> <p><b>Onsite Equipment Emissions</b> Please provide a new table 12-4 that would include all or the majority of the machines running simultaneously beginning from the first day of landfill operations. Please include the emission factors for N<sub>2</sub>) and for CH<sub>4</sub> emissions.</p> <p><b>Landfill Gas Emissions</b> Please include the current methane levels that the landfill releases so the reader will know what 50% of a given number is. Please include your best estimate to the amounts of Methane that is escaping to adjacent properties. Please give a number of what 85% is in reference to. Please define "Conservatively assuming" which leads the reader to believe that there is much more gas escaping than is being admitted to. Please list the dangers of CO<sub>2</sub> to nearby residents.</p> <p><b>Flaring Emissions</b> Please provide another table that might actually mirror the reality, maybe a table with 75% percent recovery of LFG and a flare destruction efficiency of 85%. Please clarify and list the current percent recover of LFG and flare destruction efficiency.</p> <p><b>Disposal Vehicle/Transportation Emissions</b> Please ensure that the heavy duty trucks transporting refuse exhaust is included in chapter eleven air quality reports; to not do so would be deceiving.</p> <p><b>Subsequent Phase Preparation</b> Please clarify why excluding emissions from cell construction would provide a comprehensive estimate of construction emissions.</p> <p><b>Combined Operational Emissions for Comparison to the Threshold</b> Please make report as accurate as possible and include construction and transportation emissions. To not include construction and transportation misrepresents the percent that is actually being emitted from the CCL expansion. Roughly 0.09 is vague and subject to interpretation and dismissal down the road. Please include all factors when presenting facts to the public and in the draft DEIR.</p> <p><b>Project-Level Significance Determination</b> Please factor into the cancer risk in chapter eleven that the proposed project exceeds the CARB significance threshold, and is therefore significant. Please include all dangers, and do not try to spread them out over chapters as to mislead the public.</p> <p><b>Carbon "Sink" and Sequestration</b> Please list the procedures in the removal of carbon from the carbon cycle</p>
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		<p>and permanently sequestered. Please clarify the machinery and the expected emissions that will be required in the process and the machineries impact to the environment and to the cancer risk in chapter 11.</p> <p>Please list the dangers to residents living so close to a landfill that will have 21.6 million tons of CO<sub>2</sub>e. Since the slow decay of woods and other materials may offset the landfill emissions please define why the landfill should be allowed to expand so near to residents with so many uncertainties. Please provide testing/tables with procedures listed in this section in order to offer the community more insight to the dangers or no dangers of living so close to a landfill that cannot provide accurate measurements on so many variables.</p> <p><b>Additional Mitigation Measure required Through the CEQA Process.</b> Please clarify how the Draft DEIR does not allow idling from 2 minutes, then 3.5 minutes, to 5 minutes in chapter 12. Please clarify how the idling time will be enforced. Please clarify how the idling time will be enforced when the traffic in one of the figures from the traffic section is an F. Since the table in the traffic section with an F rating is the one that factors in the current size of the communities it would be safe to assume that that figure is much closer to reality then the one the landfill is using for their estimates. Please factor in a figure more like a idling time of 30 minutes along the five and 126 corridors; then add it to the cancer risk in chapter 11 which is lacking in the exhaust dangers of cars and trucks idling as they wait for their turn at the landfill.</p> <p>Please list at what age equipment will be retired. Gas fans and misters that are near 17 years old seem to do little compared to electric equipment that is now on the market. The flaw is that it is stated, “When supplemental landfill equipment is purchased, new commercially available equipment will be purchased that meets or exceeds California’s emission standards in effect at the time of purchase.” The flaw is in the fact that very little equipment has been bought over the last 17 years, with no one to hold CCL accountable to buying the best equipment out there, the community suffers. Please list when the newest equipment will be bought from the time it is introduced on the market. It would be best if within a year of better and improved machinery arriving on the market the landfill purchases such said equipment. That holds CCL accountable.</p>
12.6.3.3	Conclusion	<p>DEIR States: As shown in Table 12-8, operation of the Proposed Project would result in the generation of GHG emissions in exceedance of the 7,000-MTCO<sub>2</sub>e/yr significance threshold. In accordance with CEQA Guidelines for GHGs Question (a), operation activities may result in a potentially significant impact on the environment. Subject to applicable laws and regulations, the emissions from operational activities, may, however, be counterbalanced to a degree by the landfill’s carbon sequestration as noted above. However, mitigation strategies, including the required LFG collection system, are being implemented to reduce the Proposed Project’s climate change impacts to the furthest extent possible.</p> <p><b>Please include other options that are working at other landfills; so the project will not be significant. Please clarify the reasons a potentially</b></p>

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		<b>significant damaging project to the environment should continue.</b>	49-68 cont'd
12.8	Significance After Mitigation	<p>DEIR States: As stated in Section 12.6.3.3, the emissions generated from the operation of the Proposed Project are significant according to the CARB significance threshold. The impacts associated with the Proposed Project will be mitigated after implementation of mitigation to the fullest extent possible, again in accordance with CARB CEQA significance thresholds. Implementation of the above mitigation measures would result in less- than- significant impacts associated with GHG and Climate Change.</p> <p><b>Please clarify who decides what is possible, if CCL decides then much less will be done, if a governing agency decides then hopefully more will be done.</b></p>	49-69
12.9.1	Potential Cumulative Impacts	<p>DEIR States: Climate Change. As discussed above, no approved thresholds or methodologies are currently available for determining the significance of a project’s potential contribution to GCC in CEQA documents. An individual project (unless it is a large-scale construction project, such as a dam or new freeway project, or a large fossil –fuel-fired power plant) is unlikely to generate sufficient GHG emissions to directly influence GCC; therefore, analysis of a project’s contribution to GCC is inherently cumulative and to a considerable degree speculative. The following is a good faith effort at disclosing and evaluating the Proposed Project’s potential impact as a portion of climate change impacts associated with build out in the context of the Santa Clarita Valley Specific Area Plan in Los Angeles County. The EIR for the Santa Clarita Valley Area Plan, One Valley, One Vision, was finalized in January 2012, and the Santa Clarita Valley Area Plan was adopted in November 2012.</p> <p>Cumulative build out of the Santa Clarita Valley area would increase GHG emissions by increasing overall population, square footage of commercial, industrial, and other supplementary uses, and by increasing traffic and the associated transportation emissions that make up 38 percent of statewide GHGs. Without corresponding GHG reduction strategies across all new projects and development, significant impacts would occur. However, the analysis of the Proposed Project demonstrates that potential GHG mitigated emissions impacts are not significant, and therefore would not hinder or delay California’s attainment of AB 32 objectives. The GHG effects of the Proposed Project are therefore not a significant cumulative impact.</p> <p>Under AB 32, it is also relevant to consider whether the impacts of climate change would significantly impact the Proposed Project. AB 32 indicates that “the potential effects of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidence of infections, disease, asthma, and other health-related problems” (State of California 2006, AB 32, §38501[a]). The 2006 CAT Report identifies further possible effects of climate change. As indicated in the CCCC report that assesses the risk of climate change to California, the following is a summary of the potential risks to California:</p>	49-70

		<ul style="list-style-type: none"> <li><input type="checkbox"/> A reduction in the Sierra snowpack which could result in a risk to hydropower</li> <li><input type="checkbox"/> A reduction in the Sierra snowpack that could result in a loss of winter recreation from insufficient snow for skiing and snowboarding</li> <li><input type="checkbox"/> A decrease in water supply could negatively impact the food supply</li> <li><input type="checkbox"/> Climate change could increase temperatures, leading to decreased supply of certain agricultural products such as wine, fruit, nuts, and milk</li> <li><input type="checkbox"/> Climate change could result in plant and animal species relocating to cooler, more habitable “up-slope” locations</li> <li><input type="checkbox"/> Climate change could negatively affect the health and productivity of California’s forests</li> <li><input type="checkbox"/> Climate change could result in up to a 55 percent increase in wildfires</li> <li><input type="checkbox"/> A rise in sea levels could result in increased coastal floods and shrinking beaches.</li> </ul> <p>The timing, severity, or precise distribution of these potential long-term impacts cannot be predicted. Most would affect nearly all Californians regardless of where they live or how their housing or workplaces were sited, designed, and developed. Of these potential effects, an increase in wildland fire danger would be most likely to impact the Proposed Project. The project site is located in a high fire hazard area, and an increase in overall wildland fire danger would increase exposure of people or structures to a risk of loss or injury.</p> <p>Please clarify why GHG are significant and then not significant. Having a landfill that is one of the most expansive in the United States should be considered a large project and should be more than significant to the GCC’s added to the environment. To underplay it in sections is deceptive. To suggest that a landfill can stop trucks from idling 2 minutes, 3.5 minutes or even within 5 minutes is also misleading. To use figures that are outdated for traffic and use them as good faith is deceptive and extremely misleading.</p> <p>The draft DEIR pointed out the dangers of so many other variables that could result in California’s Environmental uncertainty such as reduction in the Sierra snowpack which could result in a risk to hydropower, a reduction in the Sierra snowpack that could result in a loss of winter recreation from insufficient snow for skiing and snowboarding, a decrease in water supply could negatively impact the food supply, climate change could increase temperatures, leading to decreased supply of certain agricultural products such as wine, fruit, nuts, and milk, Climate change could result in plant and animal species relocation to cooler, more habitable “up-slope” locations, climate change could negatively affect the health and productivity of California’s forest, Climate change could result in up to a 55 percent increase in wildfires, and a rise in sea levels could result in increased coastal floods and shrinking beaches.</p> <p>With so many uncertainties that the Draft DEIR has pointed out it would probably be best to table such a huge expansion. An expansion of this magnitude could tip the scales and endanger the California that is so precious to so many. It would seem having a project at this time that would be significant in Global Warming would be an unwise step.</p>	49-70 cont'd
12.9.3	Significance after Mitigation	DEIR States: As stated in Section 12.6.3.3, the emissions generated from the operation of the Proposed Project are significant according to the CARB significance threshold.	49-71

		<p>The impacts associated with the Proposed Project will be less-than-significant after implementation of mitigation to the fullest extent possible, in accordance with CARB CEQA thresholds.</p> <p><b>It would seem that this is all subjective. The fact that so many things are not factored into this Draft DEIR would lead the reader to believe that it will be a significant impact for years to come. Please guarantee in a contract that the impact will not significant; in that contract include hefty fines on CCL if it is found that the estimates were all off. Please set up a bank account for those fines to be used by nearby residents to ensure that they can get the medical attention they will need.</b></p>	49-71 cont'd
Chapter 13		<p><b>The residents near CCL are oppose to sludge of any kind, but especially the definition of sludge used by all landfills. The residents are also opposed to radioactive material being allowed at CCL, along with hazardous waste to include Rockydine dirt.</b></p>	49-72
13.2.3	Operation Noise	<p>DEIR State: As a result of the Proposed Project, the maximum daily disposal tonnage would increase from 6,000 to 12,000 tons. The maximum weekly disposal tonnage would increase from 30,000 to 60,000 tons. The number of vehicles using the landfill on a peak weekday associated with these increased tonnage rates would roughly double.</p> <p>The following considerations and assumptions regarding operation noise relative to the Proposed Project have been made:</p> <ol style="list-style-type: none"> <li>1. Detailed reference noise measurements of actual landfill operating activities were conducted on August 15, 2005. The noise measurements were taken approximately 250 to 300 feet from the normal landfill operation activities.</li> <li>2. Noise levels for future operation activities would increase by 3 dBA (as a result of a doubling of sources, including doubling of traffic volume).</li> <li>3. For a conservative assessment, it is assumed that the landfill active face is located at the extension area boundary nearest to the noise receiver.</li> <li>4. If the operation activities are totally screened by large solid objects, such as buildings or topographical features, which act as effective acoustic screens, a 15 to 20 dBA reduction is applied to the calculated noise level.</li> <li>5. For a conservative approach, atmospheric absorption is not accounted for in the analysis.</li> <li>6. The operation noise level at the noise-sensitive receiver is compared with the noise limits of County of Los Angeles. If it exceeds the requirements, noise abatement measures will be recommended.</li> </ol> <p><b>Please clarify and refigure the numbers, the current intake is approximately 3,000 tons per day; that would be four times what is taken in, not double. That would also include 4 times the noise level of today.</b></p> <p><b>Please see Chapter 10 and give an honest chart for 10-9, because 10-9 will exceed the level of an F from 4:00AM until 5:00PM. Some hours as much as 228 vehicles per hour. The map is grossly wrong when compared to table 10-1.</b></p>	49-73
13.2.3 (1)	Operation Noise	<p>DEIR States:</p> <ol style="list-style-type: none"> <li>1. Detailed reference noise measurements of actual landfill operating activities were conducted on August 15, 2005. The noise measurements were taken approximately 250 to 300 feet from the normal landfill operation activities.</li> </ol>	49-74

		<b>Please offer noise measurements of actual landfill operating activities sometime after 2011, not 2005 due to the fact that 9 years has passed.</b>	49-74 cont'd
13.2.3 (2)	Operation Noise	DEIR States: 2. Noise levels for future operation activities would increase by 3 dBA (as a result of a doubling of sources, including doubling of traffic volume).  <b>The increase of 3 dBA would be in question since current noise measurements have not been used.</b>	49-75
13.2.3 (5)	Operation Noise	DEIR States: 5. For a conservative approach, atmospheric absorption is not accounted for in the analysis.  <b>Please include atmospheric absorption as the analysis needs to be as close to reality as possible.</b>	49-76
13.2.3 (6)	Operation Noise	DEIR States: 6. The operation noise level at the noise-sensitive receiver is compared with the noise limits of County of Los Angeles. If it exceeds the requirements, noise abatement measures will be recommended.  <b>Please clarify and list the procedures and equipment used if noise abatement measures are needed when and if the project exceeds the requirements.</b>	49-77
13.3.1	Local Criteria	DEIR States: The Los Angeles County General Plan, adopted in 1980, with subsequent adoption dates, includes a Noise Element which adopts the State of California noise/land use compatibility guidelines for compatibility between different land uses and their noise environment. Noise elements assist in planning for future land uses including transportation, industrial, and noise-sensitive uses such as residential, and to assist in the land use compatibility evaluation. The General Plan is currently being revised, and the draft 2013 Noise Element (Los Angeles County, 2012) maintains the same general goal of ensuring land use compatibility between proximate land uses.  The Noise Control Ordinance of Los Angeles County (Title 12 Chapter 12.08) was adopted in 1978 and amended in 2001 to prohibit loud, unnecessary, and unusual noise that disturbs the peace and/or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitivity residing in the area. The ordinance also provides sound limits for different land uses, which are assigned noise zones and corresponding noise limits, as shown in Table 13-4.  <b>Please clarify the procedures in place to measure noise level at CCL on a daily/hourly basis. Please clarify the procedures in place to measure escaping noise levels for the residents closest to the landfill; include a plan for 24 hours on any operational day, as the landfill will be active for the entire time. Please list the enforcers/employee's that will be responsible to ensure that construction activities which result in a noise disturbance at residential or commercial properties are prohibited between the hours of 7:00 p.m. and 7:00 a.m. or at any time on Sunday. Please clarify and list all construction activities along with the machinery which would result in a</b>	49-78

		<b>noise disturbance during any given day.</b>	49-78 cont'd
13.4.1	Existing Operation	<p>DEIR States:          Conditional Use Permit (CUP) No. 89-081(5) allows the landfill to operate 24 hours per day, except from 5:00 p.m. Saturday through 4:00 a.m. Monday. Access to the landfill by both commercial and general public vehicles is allowed during all hours the landfill is operating. However, CCL generally limits access to the working area by general public vehicles to daylight hours. CUP No. 89-081(5) allows CCL to operate on up to four Sundays during quarterly Val Verde cleanup days. Landfill maintenance activities may occur 24 hours per day, 7 days per week.</p> <p>CCL currently operates according to the following schedule.</p> <p>Commercial Customers          Monday 4:30 a.m. to 5:00 p.m.          Tuesday through Friday 3:00 a.m. to 5:00 p.m.          Saturday 4:30 a.m. to 3:00 p.m.</p> <p>General Public Customers          Monday through Friday 7:00 a.m. to 5:00 p.m.          Saturday 6:00 a.m. to 2:00 p.m.</p> <p>CCL may occasionally extend Saturday operating hours to 5:00 p.m. to support community cleanup activities or the special needs of its commercial customers. Additionally, CCL frequently operates during nighttime hours to accommodate special projects that require disposal during off-traffic hours. For example, in 2012, CCL operated 24 hours per day 184 times.</p> <p>CUP No. 89-081(5) allows composting activities to occur 24 hours per day, 7 days per week.</p> <p>The Proposed Project includes continued operation of the landfill and ancillary activities during times consistent with the current CUP.</p> <p>The open operating face of the landfill is generally limited to about 1 acre in size.</p> <p><a href="http://www.valverdecac.com/pdf/StatementofAgreements.pdf">http://www.valverdecac.com/pdf/StatementofAgreements.pdf</a>  <b>Please post document to response. Conditional Use Permit (DUP) No. 89-081(5) does not allow the landfill to operate 24 hours per day. There are no such provisions in this document. Please research document and provide proper data in the DEIR. CCL is never allowed to operate on up to four Sundays during quarterly Val Verde cleanup days. The days are Saturdays; please fix errors.</b></p> <p><b>The 184 times that CCL operated 24 hours was unknown to Val Verde residents until this exact moment. No such agreement allows any such activity.</b></p> <p><b>Nowhere in the CUP No. 89-081(5) allows composting activities to occur 24 hours per day, 7 days per week. Please find section and quote entire section as it is written.</b></p>	49-79

		<p>5. Val Verde Civic Association agrees to oppose any action by any party to deny CUP 89-081 - (5) during the appeals process and subsequent regulatory approval process. The parties agree the Val Verde Civic Association is solely responsible for defining how its opposition takes place. Val Verde Civic Association further agrees to support the continuation of operations of existing CUP 1809-5 should this become necessary because the permittee is precluded from operating under proposed CUP 89-081 as a result of a lawsuit.</p>
13.4.2	Existing Equipment	<p>DEIR States: Equipment used at the landfill includes bulldozers, landfill compactors, scrapers, a motor grader, backhoe/loader, and water trucks and is typical of earthmoving construction equipment. The specific equipment used at CCL varies based on task and workload. All landfill equipment is maintained on a regular basis to remain in good working order. Equipment is routinely inspected and maintained on an as-needed basis and as recommended by the manufacturer.</p> <p><b>Please clarify the landfills definition of as needed, for some it is <u>monthly/weekly/ or when it breaks down.</u></b></p>
13.4.4	Measured Existing Noise Levels	<p>DEIR States: Background noise level measurements were conducted at four locations in the vicinity of CCL. Long-term noise level measurements were conducted at two property line locations on September 15 and 16, 2005. Land uses in the vicinity of CCL have not changed since the measurements were collected, nor has the mix of equipment used at CCL changed significantly. No additional residential or commercial developments near CCL have been constructed, and no new potentially sensitive noise receptors have been identified.</p> <p>Short-term noise level measurements were conducted at two offsite locations, one in the residential area of Val Verde approximately 0.5 miles from the existing landfill activities and the other west of the landfill entrance on Wolcott Way north of SR-126 (the site of the proposed new entrance). Figure 13-1 depicts the short- and long-term noise monitoring locations. The noise monitoring locations were selected based on their being representative of adjoining land uses potentially affected by Proposed Project implementation, described as follows:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Site 1 – A short-term location, in the community of Val Verde, closest to the landfill, directly across the street from 28959 Windsor Road, at the intersection of Windsor Road and Hunstock Street</li> <li>Site 2 – A short-term location, at the proposed new entrance to the landfill on Wolcott Way, at the intersection of Wolcott Way and Franklin Parkway</li> <li><input type="checkbox"/> Site 3 – A long-term location, in the vicinity of the existing post office building and near the Proposed Project extension area (east)</li> <li><input type="checkbox"/> Site 4 – A long-term location, at the property line west of the landfill (west)</li> </ul> <p>Appendix I-1 includes photographs of the noise monitors as they were set up at each monitoring location. Long-term measurement equipment consisted of two Larson Davis (LD) Model 820 sound level meters, and short-term measurements were collected with LD Model 824. A LD CAL-200 acoustical calibrator was used for calibration of the microphones to ensure the accuracy of the measurements. All the equipment complies with the requirements of American National Standards Institute and the International Electrotechnical Commission for precision (Type 1) sound level measurement instrumentation.</p>

49-80

49-81

		<p>Weather conditions during the measurements consisted of clear skies with calm to slightly breezy wind conditions, and temperatures were between 75 degrees Fahrenheit (°F) in the morning to 80°F in the afternoon.</p> <p>Table 13-6 summarizes the short-term noise measurement results. Long-term measurement results are summarized in Table 13-7. The detailed noise measurement data are attached to this report in Appendix I-2.</p> <p><b>Please mail and maintain noise survey for the residents within 1000 feet of the landfill as the crow flies. It has been noted at the Val Verde Civic Association Meetings that residents have complained of noise emanating from the landfill during sleeping hours.</b></p> <p><b>Please date when short-term noise level measurements were conducted as residents are unaware of any such testing.</b></p> <p><b>Please list steps and procedures to ensure that sound level will not be exceeded as it was in table 13-6. Keep in mind that it will be 4 times the trash and 24 hours a day, which is not allowed now. Please fix documentation that says it is allowed.</b></p>
13.5.2.1	Construction	<p>DEIR States: Construction activities would result in a temporary direct increase in ambient noise levels around the construction area. The actual increase in offsite sound levels would depend on the construction activity occurring, the location of that activity, and the number and mix of construction vehicles and equipment in use and will vary over time. Construction activities are anticipated to occur during the day when ambient levels are typically higher and residences are less sensitive to noise.</p> <p>At its closest point, the landfill construction activities are approximately 1,200 feet from the closest residential area (represented by Site 1, Val Verde). Assuming an average construction equipment sound level of 85 dBA at 50 feet, consistent with Table 13-3, and up to 44 pieces of equipment operating simultaneously, the predicted residential sound level is 54 to 59 dBA (evaluated using a 20- and 15-dBA barrier reduction for the intervening mountain ridgeline). Such levels comply with the Los Angeles County daytime sound requirements of 60 dBA for construction activities lasting 10 or more days. When construction operations are occurring in more distant areas, equipment is dispersed beyond 1,200 feet or less equipment is in use, the predicted sound levels will decrease.</p> <p><b>Please clarify if construction will only be during the day; expected is vague and cannot be maintained. As we have found out that the closing of the landfill every night was not maintained for 184 24 hour periods in 2012. Please provide a schedule that will be enforced for heavy equipment, include operation hours for each piece of heavy equipment and hours of non-operation of heavy equipment.</b></p> <p><b>The natural barrier does not stop the sound now. Please clarify that the nearest house is 500 feet as the crow flies, but it is 1,200 feet from the landfill when defining the construction phase. Please make sure that your data is accurate. The volume of truck traffic will be four times what it is</b></p>

49-81  
cont'd

49-82

		<p><b>today, today it is significant and to say it will be less than significant when one of the models posted gives the congestion an “F” is less than honest. Please reword to a more accurate reality.</b></p>	49-82 cont'd
13.6.1	Construction	<p>DEIR States: The Proposed Project will be constructed in manner to ensure the applicable County of Los Angeles noise requirements are satisfied. Therefore, no noise mitigation is required for construction activities associated with the Proposed Project.</p> <p><b>Please include a mitigation plan for residents who are awakened by the operations of the CCL activities and expansion project.</b></p>	49-83
13.6.2	Operation	<p>The Proposed Project will be operated in a manner to ensure the County of Los Angeles noise requirements are satisfied. Therefore, no noise mitigation is required for operation of the Proposed Project.</p> <p><b>Please include a mitigation plan for residents who are awakened by the operations of the CCL activities and expansion project.</b></p>	49-84

# Letter No. 49

Steve Lee  
Citizens for Chiquita Canyon Landfill Compliance

## Response to Comment No. 49-1

Please see revised Chapter 1, Introduction, of the Partially Recirculated Draft EIR, which clarifies the operational baseline for the Proposed Project. In addition, see the Traffic Supplement included in the Partially Recirculated Draft EIR and included in Appendix G of the Final EIR for a discussion of traffic relative to the operational baseline.

Please also see Table 11-1 of the Final EIR for a list of best management practices (BMPs) to control fugitive dust; see Topical Response #29a, Wastes to be Disposed, and Topical Response #21, Public Health.

## Response to Comment No. 49-2

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects, and Topical Response #21, Public Health.

## Response to Comment No. 49-3

Please see the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, as well as Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health. Existing locations of sensitive receptors, such as schools, and locations of planned schools, residences, and businesses are included in the air quality and health risk analyses for the Proposed Project and Cumulative Impacts analyses for the Proposed Project, even if not specifically identified in the text of the Air Quality chapter. Please see Chapter 11, Section 11.9 of the Partially Recirculated Draft EIR.

Meteorological data inputs for the Health Risk Assessment are provided in Appendix H, which incorporates observed meteorological data trends. Please also see Topical Responses #1d and #1e, Air Quality, for additional information.

## Response to Comment No. 49-4

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects.

## Response to Comment No. 49-5

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1g, Enforcement of Mitigation Requirements.

## Response to Comment No. 49-6

Please see Topical Response #1a, Existing Conditions: Emissions, Monitoring, and Health Effects; Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1g, Enforcement of Mitigation Requirements.

## Response to Comment No. 49-7

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1g, Enforcement of Mitigation Requirements.

## Response to Comment No. 49-8

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1g, Enforcement of Mitigation Requirements.

## Response to Comment No. 49-9

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions. Best management practices (BMPs) associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the Mitigation Monitoring and Reporting Plan (MMRP) included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the South Coast Air Quality Management District (SCAQMD), who will oversee compliance with permit conditions and dust control plans.

## Response to Comment No. 49-10

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions. BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the MMRP included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the SCAQMD, who will oversee compliance with permit conditions and dust control plans.

## Response to Comment No. 49-11

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions. BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the MMRP included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the SCAQMD, who will oversee compliance with permit conditions and dust control plans.

## Response to Comment No. 49-12

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects.

## Response to Comment No. 49-13

Increased traffic volume as a result of the Project is discussed in Original Draft EIR Chapter 10, Traffic and Transportation, and is also shown in the traffic section of the Project Description of the Partially Recirculated Draft EIR.

Potential air quality impacts, including health risk, associated with the Proposed Project, including from increased traffic, are addressed in the Air Quality chapter of the Partially Recirculated Draft EIR.

In addition, please see Topical Response #1, Air Quality, Topical Response #16, Noise, and Topical Response #21, Public Health.

## Response to Comment No. 49-14

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1e, Methods and Models Used in Health Risk Assessment, and Impacts to Surrounding Neighborhoods. Please see the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, as well as Topical Response #1, Air Quality, and Topical Response #21, Public Health.

It is not clear what the commenter is referring to regarding the "burning of waste." CCL does not use any type of incineration for waste management. There is no burning of waste at CCL.

#### Response to Comment No. 49-15

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects.

#### Response to Comment No. 49-16

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects. Please also see Topical Response #5, Conditional Use Permit and Community Agreement.

#### Response to Comment No. 49-17

Please refer to Chapter 11, Air Quality, of the Final EIR for updated air monitoring data and the updated air quality impact analysis. Please also see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects.

#### Response to Comment No. 49-18

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects.

#### Response to Comment No. 49-19

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects.

#### Response to Comment No. 49-20

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting. BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the MMRP included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the SCAQMD, who will oversee compliance with permit conditions and dust control plans.

#### Response to Comment No. 49-21

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-22

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-23

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-24

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-25

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting. BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the MMRP included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance

with the MMRP, along with the SCAQMD, who will oversee compliance with permit conditions and dust control plans.

#### Response to Comment No. 49-26

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-27

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-28

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-29

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-30

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-31

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-32

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-33

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-34

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting. Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions, and Topical Response #1e, Methods and Models Used in Health Risk Assessment, and Impacts to Surrounding Neighborhoods. Please see the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, as well as Topical Response #1, Air Quality, and Topical Response #21, Public Health.

#### Response to Comment No. 49-35

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-36

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

#### Response to Comment No. 49-37

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions. BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the MMRP included in the Final EIR. Potential air quality impacts, including health risk, associated with the Proposed Project,

including from increased traffic, are addressed in the Air Quality chapter of the Partially Recirculated Draft EIR.

In addition, please see Topical Response #21, Public Health.

### Response to Comment No. 49-38

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects. Please also see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions. BMPs to reduce emissions, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the MMRP included in the Final EIR. Potential air quality impacts, including health risk, associated with the Proposed Project, including from increased traffic, are addressed in the Air Quality chapter of the Partially Recirculated Draft EIR.

In addition, please see Topical Response #21, Public Health.

### Response to Comment No. 49-39

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects, and Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

### Response to Comment No. 49-40

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects, and Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

### Response to Comment No. 49-41

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1d, Methods and Models Used in Air Dispersion Modeling, and Impacts to Surrounding Neighborhoods. Please also see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of emissions and impacts.

### Response to Comment No. 49-42

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1g, Enforcement of Mitigation Requirements.

### Response to Comment No. 49-43

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions. Please also see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of emissions and impacts.

### Response to Comment No. 49-44

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1d, Methods and Models Used in Air Dispersion Modeling, and Impacts to Surrounding Neighborhoods.

### Response to Comment No. 49-45

Please see Topical Response #1d, Methods and Models Used in Air Dispersion Modeling, and Impacts to Surrounding Neighborhoods.

## Response to Comment No. 49-46

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1g, Enforcement of Mitigation Requirements.

## Response to Comment No. 49-47

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1e, Methods and Models Used in Health Risk Assessment, and Impacts to Surrounding Neighborhoods.

## Response to Comment No. 49-48

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of odor, including current and future sources and management strategies. Please also see Topical Response #17, Odor.

## Response to Comment No. 49-49

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of odor, including current and future sources and management strategies. Please also see the following Topical Responses:

- #10, Environmental Monitoring
- #17, Odor
- # 29b, Waste Screening and Acceptance Program

## Response to Comment No. 49-50

Please see Topical Response #16, Noise.

## Response to Comment No. 49-51

Please see Topical Response #11 for a discussion of Geologic Hazards, as well as Topical Response #14 for a discussion of the Landfill Liner System.

With regard to the potential for liner leaks, please see Topical Response #10 for a discussion of Environmental Monitoring, including groundwater monitoring.

## Response to Comment No. 49-52

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting; Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1d, Methods and Models Used in Air Dispersion Modeling, and Impacts to Surrounding Neighborhoods.

## Response to Comment No. 49-53

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1e, Methods and Models Used in Health Risk Assessment, and Impacts to Surrounding Neighborhoods. Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, which includes an updated cumulative impacts analysis, including health risk assessment for cumulative projects. Please also see Topical Response #7, Cumulative Impacts, and Topical Response #21, Public Health.

## Response to Comment No. 49-54

Dispersion modeling was performed consistent with SCAQMD Guidance. A description of the dispersion modeling methodology was included in Appendix H of the Original Draft EIR. Emissions included in the dispersion modeling impacts analysis were conservatively modeled at their estimated maximum (see Appendix H and Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions). Please refer to Topical Response #1d, Methods and Models Used in Air Dispersion Modeling, and Impacts to Surrounding Neighborhoods; and Topical Response #1g, Enforcement of Mitigation Requirements.

## Response to Comment No. 49-55

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #25, Traffic.

## Response to Comment No. 49-56

Please see the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, as well as Topical Response #1, Air Quality, Topical Response #17, Odor, and Topical Response #21, Public Health. Existing locations of sensitive receptors, such as schools, and locations of planned schools, residences, and businesses are included in the air quality and health risk analyses for the Proposed Project and Cumulative Impacts analyses for the Project, even if not specifically identified in the text of the Air Quality chapter. Please see Chapter 11 and Section 11.9 of the Partially Recirculated Draft EIR.

Meteorological data inputs for the Health Risk Assessment are provided in Appendix H, which incorporate observed meteorological data trends. Please also see Topical Responses #1c, #1d, and #1e, Air Quality, for additional information.

## Response to Comment No. 49-57

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of odor, including current and future sources and management strategies. Please also see Topical Response #17, Odor.

## Response to Comment No. 49-58

Please see Topical Response #1e, Methods and Models Used in Health Risk Assessment, and Impacts to Surrounding Neighborhoods. Please also see Topical Response #21, Public Health.

## Response to Comment No. 49-59

Please see Topical Response #29a for discussion of Wastes to be Disposed. Please also see Topical Response #4, Conditional Use Permit Compliance, for a discussion of historical and current disposal of sludge at CCL.

## Response to Comment No. 49-60

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which supersedes the chapter discussed by the commenter. In addition, please see responses to Comment Nos. 293-202 through 293-252.

## Response to Comment No. 49-61

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which supersedes the chapter discussed by the commenter. In addition, please see responses to Comment Nos. 293-202 through 293-252.

## Response to Comment No. 49-62

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which supersedes the chapter discussed by the commenter. In addition, please see responses to Comment Nos. 293-202 through 298-252.

## Response to Comment No. 49-63

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which supersedes the chapter discussed by the commenter. In addition, please see responses to Comment Nos. 293-202 through 298-252.

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR and Topical Response #17, Odor, for a detailed discussion of potential odor impacts associated with the compost facility and the Odor Impact Minimization Plan.

## Response to Comment No. 49-64

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which supersedes the chapter discussed by the commenter. In addition, please see responses to Comment Nos. 293-202 through 293-252.

## Response to Comment No. 49-65

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which supersedes the chapter discussed by the commenter. In addition, please see responses to Comment Nos. 293-202 through 293-252.

## Response to Comment No. 49-66

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which supersedes the chapter discussed by the commenter. In addition, please see responses to Comment Nos. 293-202 through 293-252.

## Response to Comment No. 49-67

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which supersedes the chapter discussed by the commenter. In addition, please see responses to Comment Nos. 293-202 through 293-252.

## Response to Comment No. 49-68

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which supersedes the chapter discussed by the commenter. In addition, please see responses to Comment Nos. 293-202 through 293-252.

## Response to Comment No. 49-69

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which supersedes the chapter discussed by the commenter. In addition, please see responses to Comment Nos. 293-202 through 293-252.

## Response to Comment No. 49-70

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which supersedes the chapter discussed by the commenter. In addition, please see responses to Comment Nos. 293-202 through 293-252.

## Response to Comment No. 49-71

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR, which supersedes the chapter discussed by the commenter. In addition, please see responses to Comment Nos. 293-202 through 293-252.

## Response to Comment No. 49-72

Please see Topical Response #29a for a discussion of Wastes to be Disposed. Please also see Topical Response #4, Conditional Use Permit Compliance, for a discussion of historical and current disposal of sludge at CCL.

## Response to Comment No. 49-73

Please see Topical Response #16 for a discussion of Noise.

## Response to Comment No. 49-74

Please see Topical Response #16 for a discussion of Noise.

## Response to Comment No. 49-75

Please see Topical Response #16 for a discussion of Noise.

## Response to Comment No. 49-76

Please see Topical Response #16 for a discussion of Noise.

## Response to Comment No. 49-77

Please see Topical Response #16 for a discussion of Noise.

## Response to Comment No. 49-78

Please see Topical Response #16 for a discussion of Noise.

## Response to Comment No. 49-79

Please see Topical Response #16 for a discussion of Noise.

## Response to Comment No. 49-80

Please see Topical Response #16 for a discussion of Noise.

## Response to Comment No. 49-81

Please see Topical Response #16 for a discussion of Noise.

## Response to Comment No. 49-82

Please see Topical Response #16 for a discussion of Noise.

Response to Comment No. 49-83

Please see Topical Response #16 for a discussion of Noise.

Response to Comment No. 49-84

Please see Topical Response #16 for a discussion of Noise.



#50



Iris Chi  
County of Los Angeles  
Department of Regional Planning  
Zoning Permits North Section, Room 1348  
320 West Temple Street  
Los Angeles, CA 90012  
Email ichi@planning.lacounty.gov.

October 13, 2014

Attention: Iris Chi  
Reference Project No.: R2004-00559-(5)  
Conditional Use Permit no.: 200400042  
Environmental Assessment No. 200400039  
State Clearinghouse Number 2005081071

The potential impacts of allowing the Chiquita Canyon Landfill to expand are not acceptable to the surrounding residents of this landfill. Having lived next to this landfill since 1989 with the odors and complaints knowing 2019 would be the end of active trash odors was a welcome blessing to us all.

***How Complacent Is the County?***

With commentary listing no shortfalls for trash until 2023 in the County reports, one can be surprised we are visiting another expansion at the Chiquita Canyon Landfill but than again it looks like the County already knew they were facing another expansion your very own reports listed below, that an expansion for the landfill seems hidden from the public and in the county's own reports as listed <http://dpw.lacounty.gov/epd/swims/docs/pdf/CIWMP/2009.pdf> no further expansion page 50/51 and than listed on the following report <http://dpw.lacounty.gov/epd/swims/docs/pdf/CIWMP/2012.pdf> under pages 50 and 51 of the county was notified of expansion decisions in this report.

50-1

***Why Does It Seem That The DEIR Is A Fait Accompli?***

Why didn't the county notify the surrounding areas of proposed expansions at the time of above reports? Should the Chiquita Canyon Landfill have had to notify the surrounding areas of their intent in 2012? Reports the Chiquita Canyon Landfill was making strides with what shows the County for expansions in the year of 2012 based on 2011 annual reports and the closing of other landfills listed on this report?

Of concern listed in the very same DEIR reports the landfill cannot accept biosolids, but there are reports of this very landfill accepting biosolids into this location. The current public comment time should have been offered in 2012 if this report is accurate for this expansion. Many people have purchased homes and businesses around this location for expansion? Didn't the county consider the having the Castaic/Hart High School right near this expansion? Were target zones of higher health risks for more children considered with communities before expansion? This is an extreme example of how the current residents of the surrounding areas are not informed as plans were forming. The above report lists

50-2

another 26 years of expansion written and published in 2012 and now we are visiting this for what seems the first time. The request is for many years past the 26 listed in the above report of 2012. What is going on?

50-2  
cont'd

***The Landfills Ruptured Liner?***

Should the county consider to expand a landfill that has prior reports of violations? Should it consider a landfill that has suffered a rupture in its liner from the 1994 Northridge Earthquake with the crest of the fault so close to the landfill?

The first landfill expansion was required to be reviewed by the board under a Superior Court judge one can see the attached articles.

<http://articles.latimes.com/keyword/chiquita-canyon-landfill>

The evidence supports that this landfill has already born its limit in trash. The community surrounding this landfill cannot accept more trash. More pressure on the liner of this landfill and the respective surrounding areas threatens us.

50-3

***Is Our Water Poisoned?***

There are higher reported historical levels of metal in the ground water taken and supported by testing. Do we need another Hinkley, California situation before our governing protectors are aware the historical ground water levels are rising? [http://www.pbs.org/newshour/updates/science-jan-june13-hinkley\\_03-13/](http://www.pbs.org/newshour/updates/science-jan-june13-hinkley_03-13/)

The ground water reports list trace and historical increases in readings. What reports for increase in historical ground water reports have been done for this landfill based on current landfill closure and that of an expansion and extension past 2019?

<http://www.valverdecac.com/pdf/reports/2013AnnualGroundwaterMonitoringReport.pdf>

The very report above lists increases in Dichloroethane and Tetrchloroethene. Not being a scientist or a ground water specialist, it is interesting the landfill odors happened when the reports were filed. Inspectors called and the higher readings have been recorded during times of odors and complaints. How are these gases escaping under the landfill and causing higher readings in this very report?

The report lists it is the gases released from the landfill that effect the ground water levels. If the gases are affecting the ground water what is this doing to the public surrounding this location?

50-4

***Where Is The Long Term Planning?***

The situation with trash in all of the Los Angeles County is a mess. Forcing individuals to just accept another landfill expansion of odor and nuisance from the Chiquita Canyon Landfill is not efficient planning for the long-term needs of the citizens nor is it acceptable for the environment. Do I understand correctly this will be the largest landfill in all of the United States if approved? How can this even be considered in a populated area? Our health and the health of the environment are

50-5

now at risk in a populated area under your watch. How is this planning? Did you consider the emotional effects this is again being bestowed upon the residents that have already lived through one expansion period for years already?

We have suffered a profound loss of confidence in the planners for once again considering another expansion of the Chiquita Canyon Landfill that was promised to close in 2019?

Does anyone having jurisdiction over us care about our health and well-being?

Why wasn't the target zones for cancer rates within the surrounding areas of this landfill not disclosed to the public when the homes were being constructed? What about current construction and public disclosures? Should the State of California issue that target zone homes have warning labels on these properties and may cause cancer?

There are public schools that will be hit with in a higher cancer rate due to this expansion. Are children's lives acceptable to sacrifice?

When will the county consider safer remote locations for humanities waste?

50-5  
cont'd

***Why hasn't the county implemented a higher waste diversion for trash?***

Why does the county allow the trash to go to the landfill before it has been sorted?

50-6

Why has the Chiquita Canyon Landfill been allowed to cover the trash with wet composting in prior years?

50-7

Why are there not enough inspectors for this landfill from governing agencies? (AQMD, LA County Dept of Health... on ward)

Why is this landfill to now be operated and open 24 hours a day, 365 days of the year? Some of our worst odors offend on weekends when inspectors have been difficult for residents to notify. Some violations have taken place on Saturdays; personally I have accepted apologies from the landfill managers. I have written in the note books of the smell walkers from this landfill many times in our community stating that there are odors but many of the walkers for the landfill do not smell the odors nor do they speak the same language as I do, so I write in their note books what I am experiencing at the time they are walking around in the mornings. What do they do with these notebooks?

What bans are actively being inspected at this landfill and what organizations are responsible for protecting the residents surrounding this landfill and the environment?

50-8

<p>What percentage of ill individuals are acceptable under the counties own knowledge of a dangerous exposure to the very same air contaminates this landfill has already exposed to so many individuals in the target zones of this landfill?</p>	50-9
<p>How many of these people voting yes for this expansion actually live with in the target zones of this landfill and the possible health problems?</p> <p>Why is such an important issue not being voted on by all voting citizens in both Los Angeles County, City of Santa Clarita and surrounding areas? Is this exploitation without representation?</p> <p>When will the Chiquita Canyon Landfill notify the surrounding areas with flyers telling residents what zones they will be in if the expansion occurs? Will the landfill be required to do is before the voting of this project? Will the flyers ever be available in Spanish?</p> <p>What are the differences offered to unincorporated areas, cities and counties in reference to notification?</p> <p>Why is it many of the local news and media are not reporting on this issue? Is this about financial influence? Is corruption at hand?</p>	50-10
<p>Why is the county considering another extension on this situation 20-38 years, the mess that should have been alleviated 20 years prior?</p>	50-11
<p>What is being done regarding illegal biosolids that were not supposed to have been dumped into this landfill?</p>	50-12
<p>The Interstate 5 north bound is already a difficult area to transverse now. Does the idea of more trucks and 24-hours-a-day open scales seem like a great solution for this matter of trash?</p>	50-13
<p>Why hasn't the county implemented cleaner ways to dispose of trash, such as burn it or melt it into reusable fuel or electricity?</p> <p>Why hasn't the county implemented other methods of decomposition to deal with the trash?</p>	50-14
<p>How many times have closest residents reported the offensive odors to the AQMD over the years since April of 2000?</p>	50-15
<p><b><i>Dust In The Canyon</i></b></p> <p>Who is testing the topsoil of the dirt that is being removed from the hills closest to the landfill for contaminates or bacteria? This is the same dirt that is being moved to the east area near Commerce Center area for the new overpass</p>	50-16

roadwork on the other side of Interstate 126? This is certainly the same area that had run off from flooding and trash. This is an area that was affected by windy days. Is the dust, from the grading which has been reported to the AQMD, a particulate matter of concern or contaminated from the landfill run-off because of the rains and flooding in 2005?

50-16  
cont'd

***The Surrounding Agriculture and Grazing Animals***

What happens to the agriculture surrounding this landfill if the ground water becomes more contaminated? This landfill is close to the same fruits and vegetables that feed all the communities. World famous companies ship these fruits and vegetables around different states?

50-17

***The following article is interesting as methane released into the ground waters near landfills are of environmental concerns even in Nigeria.***

[http://www.akamaiuniversity.us/PJST12\\_2\\_488.pdf](http://www.akamaiuniversity.us/PJST12_2_488.pdf)

***Is anyone paying attention to the historical metal levels climbing in the water ground reports?***

***What about the cows that feed in the land just below the area where the water run off area is located for this landfill? Who's testing the topsoil where those animals are grazing? Is it true that alfalfa helps to cleanse the contaminated soil? Interesting is that not alfalfa grown in the canyon nearest our landfill annually?***

50-18

***The Cost Of Health?***

If this expansion is granted where should residents and individuals send their medical bills for the lung diseases and pre-cancer screening? The very same conditions, which your own DEIR currently reports, will increase in target zones.

Am I to understand the residents and the public school of Live Oak Elementary are to be in the target zone for increased health risks?

Why would the county allow 700 children in attendance annually at this public location to be at increased risks for cancer? What about the other local schools as well?

50-19

***"The Valley of the Dumps"***

I am sure our governing people have heard this term. Will the county charge fees to allow visitation the largest landfill in the United States?

Will the fees be given to the victims of the odor? Will nuisance lawsuits ensue for projection health problems? Will the county be sued?

What is the proposed method of future reporting of odors and nuisance for this landfill?

50-20

The current methods of reporting do not result in prompt action from governing agencies or from the Chiquita Canyon Landfill.

Residents have been exposed the landfill illegally moving 50 tons of trash that's 100,000 pounds of trash on a Saturday morning without permits in 2004. What has the county done to make sure this landfill does not move more trash without permits on weekends?

The landfill was moving trash again as recently as October 2014, without notification of such odors causing events on a Saturday morning.

Many believe this landfill does not report violations to relevant agencies. Why does the landfill only have to spot check a small amount off loads daily? Why isn't every load checked? How is it that biosolids were accepted? Was that load not checked? Why is the landfill saying the trash expectancy levels will be met before the closure? Is there not a daily limit on acceptance? What agency oversees the acceptance and the compliance besides this very landfill wanting another expansion?

***What is the procedure for checking the loads in this landfill?***

***Who decides what loads to check?***

***Why is this landfill not required to check every load?***

50-21

***Why doesn't the county require air quality monitors with particulate matter surrounding the target zones of this landfill be testing 24 hours daily by an independent agency for 13 of the major toxins which might be released from landfills?***

50-22

There are many questions to be asked of the governing individuals before everyone approves another expansion with interests involving this location.

Let me leave you with this interesting article by Christopher Helman of Forbes Staff titled America's Biggest Landfills dated October 13, 2010.

<http://www.forbes.com/2010/10/13/los-angeles-las-vegas-business-energy-biggest-landfills.html>

***What it will be like to have the largest landfill in the United States in our community with such historical Indian significance right in the middle of the Chiquita Canyon landfill?***

Thank you for your time and consideration.

50-23

Sincerely,



Natalie Tate,

Resident of the Val Verde Park area since 1989

# Letter No. 50

Natalie Tate

## Response to Comment No. 50-1

CCL has been working with the Los Angeles County Department of Regional Planning on an expansion proposal since 2004. A Notice of Preparation was initially released in August 2005 and again in 2011. Please see Topical Response #22, Public Scoping and Public Outreach. Los Angeles County Annual Reports to the Countywide Integrated Management Plan have identified a potential future expansion for CCL since the 2005 Annual Report.

## Response to Comment No. 50-2

CCL has been working with the Los Angeles County Department of Regional Planning on an expansion proposal since 2004. A Notice of Preparation was initially released in August 2005 and again in 2011. Please see Topical Response #22, Public Scoping and Public Outreach. Los Angeles County Annual Reports to the Countywide Integrated Management Plan have identified a potential future expansion for CCL since the 2005 Annual Report.

## Response to Comment No. 50-3

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance, as well as Topical Response #14, Landfill Liner System.

## Response to Comment No. 50-4

Please see Topical Response #10, Environmental Monitoring, for a discussion of groundwater and landfill gas monitoring.

## Response to Comment No. 50-5

The Los Angeles County Department of Public Works (LACDPW) has a Countywide Integrated Waste Management Plan (CIWMP), for which it prepares Annual Reports. The CIWMP documents the County's ongoing efforts to secure adequate waste disposal capacity to meet the needs of County residents for a 15-year planning period.

Please see Topical Response #9, Environmental Justice, for a discussion of the relative size of the Proposed Project. Please also see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR for an updated health risk assessment, as well as Topical Response #21, Public Health.

## Response to Comment No. 50-6

Waste is sorted before it arrives at CCL. In 2013, 66 percent of the waste delivered to CCL arrived in a transfer truck. These trucks leave from a Materials Recovery Facility, at which waste sorting has already occurred. The remainder of waste arrives at CCL via direct haul/local collection trucks. These trucks bring waste from local jurisdictions, which are required to comply with stringent sorting and waste diversion requirements. These requirements related to recycling and waste diversion, are discussed in Topical Response #19, Project Need.

## Response to Comment No. 50-7

Compost has never been used to cover trash at CCL.

## Response to Comment No. 50-8

Please see Topical Response #4, Conditional Use Permit Compliance, for a discussion of landfill operating hours, and Topical Response #10, Environmental Monitoring, for a discussion of air quality monitoring.

## Response to Comment No. 50-9

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, which includes an updated health risk assessment for the Proposed Project. Please also see Topical Response #21, Public Health.

## Response to Comment No. 50-10

Please see Topical Response #22, Public Scoping and Public Outreach.

## Response to Comment No. 50-11

Please see Topical Response #19, Project Need.

## Response to Comment No. 50-12

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance.

## Response to Comment No. 50-13

Please see Topical Response #25, Traffic, for a discussion of potential impacts to Interstate 5 (I-5).

24-hour operation of CCL contributes to a more even distribution of traffic arriving at CCL throughout the day.

## Response to Comment No. 50-14

LACDPW has a Countywide Integrated Waste Management Plan (CIWMP), for which it prepares Annual Reports. The CIWMP documents the County's ongoing efforts to evaluate alternative technologies for managing the County's solid waste.

## Response to Comment No. 50-15

Odor complaints made to the South Coast Air Quality Management District are summarized and described in the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR.

## Response to Comment No. 50-16

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, which addresses the health concerns associated with particulate matter. It includes best management practices (BMPs) for control of dust generated from construction and operation activities.

## Response to Comment No. 50-17

Please see Topical Response #10, Environmental Monitoring, for a discussion of groundwater quality monitoring, and Topical Response #30, Water Quality.

## Response to Comment No. 50-18

Please see Topical Response #10, Environmental Monitoring, for a discussion of surface and groundwater quality monitoring.

## Response to Comment No. 50-19

Please see revised Chapter 11, Air Quality of the Partially Recirculated Draft EIR, which includes an updated health risk assessment for the Proposed Project. Please also see Topical Response #21, Public Health.

## Response to Comment No. 50-20

Please see the following Topical Responses:

- #9, Environmental Justice
- #10, Environmental Monitoring
- #17, Odor
- #21, Public Health

## Response to Comment No. 50-21

(1) CCL is permitted to operate 7 days per week, 24 hours per day, and to accept waste for disposal those same hours except from 5:00 pm on Saturday to 4:00 am on Monday. Therefore, it is not possible for CCL to have illegally moved waste on a Saturday without a permit.

(2) Load checking: Please see Topical Response #29b, Waste Screening and Acceptance Program.

(3) The current Conditional Use Permit (CUP) for CCL has three different triggers for closure of the CUP: date (November 2019), waste tonnage (23 million tons), and airspace. Because CCL has done a good job of waste compaction, it has reached the waste tonnage limit specified in the CUP before reaching the closure date or airspace limit.

(4) Multiple agencies oversee waste acceptance and compliance.

## Response to Comment No. 50-22

Please see Topical Response #10, Environmental Monitoring, for a discussion of air quality monitoring.

## Response to Comment No. 50-23

Please see Topical Response #9, Environmental Justice, for a discussion of the Proposed Project's relative size. Please also see Topical Response #6, Cultural Resources, for a discussion of Bowers Cave.





CYNTHIA A. HARDING, M.P.H.  
Interim Director

JEFFREY D. GUNZENHAUSER, M.D., M.P.H.  
Interim Health Officer

ANGELO J. BELLOMO, REHS, QEP  
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#51

BOARD OF SUPERVISORS

- Gloria Molina  
First District
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Fourth District
- Michael D. Antonovich  
Fifth District

October 16, 2014

TO: Iris Chi  
Regional Planning Assistant II  
Department of Regional Planning

FROM: Michelle Tsiebos, REHS, MPA (M.T)  
Environmental Health Division  
Department of Public Health

SUBJECT: CEQA CONSULTATION /CHIUQUITA CANYON LANDFILL (CCL)  
PROJECT NO. R2004-00559-(5) / RENV 200400039  
29201 HENRY MAYO DRIVE, CASTAIC, 91384

The Department of Public Health - Environmental Health Division has reviewed the Draft Environmental Impact Report (DEIR) for the project identified above. The Department is offering the following comments:

For questions regarding the attached reports, please contact the individuals listed at the bottom of the report. For all other questions, please contact me at (626) 430-5382 or at [mtsiebos@ph.lacounty.gov](mailto:mtsiebos@ph.lacounty.gov).

<p><b>Solid Waste Management Program (SWMP)</b></p> <p>The Program has reviewed the DEIR. The Program wants to remind CCL that further details regarding beneficial use of tonnage will be addressed during the Solid Waste Permit application process for revision of the permit.</p>	51-1
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**Chapter 2.0 Project Description**

<p><b>Section 2.2.3 Disposal Rate and Volume and Section 2.2.5 Materials to be diverted from Waste Disposal</b></p> <p>According to the Solid Waste Facility Application Form CIWMB E-177, "other" material will need to be identified in the application and "should" total the Peak Daily Tonnage as defined below.</p>	51-2
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INSTRUCTIONS FOR COMPLETING THE APPLICATION FOR  
SOLID WASTE FACILITY PERMIT/WASTE DISCHARGE REQUIREMENTS  
(NEW Permit Application Form CIWMB E-1-77, Revised 8/2004, Effective 1/1/2005)  
... B. Facility Information

1. *Information Applicable To All Facilities: This portion of Part 3 must be filled out by every applicant regardless of the type of facility.*

a. **Peak Daily Tonnage or Cubic Yards:** *The peak (maximum) total amount of waste and material the facility is permitted to receive through the gate to store, process, transfer, or dispose per day. This amount shall be expressed in tons, if tonnage is not available or not applicable provide this in cubic yards with a conversion factor. This will be referred to as the "permitted maximum tonnage" and is considered the facility maximum tonnage limit. Must be consistent with the Report of Facility Information (RFI) and any California Environmental Quality Act (CEQA) existing compliance documentation and/or within the scope of the analysis in a CEQA review, if any, that was being conducted at the time the application was submitted. Volume figures should be converted to tons and the conversion factor should be documented in the accompanying RFI.*

51-2  
cont'd

1. **Disposal/Transfer:** *The amount of material that comes through the gate and is disposed of on-site or transferred off site as waste; and*

2. **Other:** *That amount of material that is recycled or used for beneficial use such as ADC or other on-site projects. Note: 1 and 2 should equal the peak daily tonnage or cubic yards.*

b. **Daily Design Tonnage (TPD):** *For landfills, the maximum daily tonnage of waste and material that the facility is designed to receive based on appropriate factors including, but not limited to, size of working face, vehicle traffic considerations, hours of operation, etc. For other facilities, it is the maximum amount of waste and material the facility is designed to handle at any one-time based on appropriate factors including, but not limited to, vehicle traffic consideration, hours of operations, length of material storage, equipment movement, etc. Design tonnage may be equal to or greater than the peak daily tonnage.*

**Page 2-6 section 2.2.4 Wastes to be received**

The Solid Waste Facility Permit No. is 19-AA-0052, please correct.

51-3

**Page 2-6 section 2.2.4 last paragraph**

Is Chiquita Canyon currently receiving any liquid waste? Explain.

51-4

**Page 2-15 section 2.2.5 Materials to be diverted from waste disposal**

It is not clear if nonhazardous contaminated soil will be used as daily cover material or if it will be disposed. Refer to Table 2-2 page 2-15, superscript d. How will it be clear that some material is sometimes used for beneficial use while other times it will be disposed? Will this be true for all other beneficial reuse material? If this is the case, then this material will need to be included in the disposal tonnage.

51-5

**Page 2-30, section 2.2.9.2, 3rd paragraph from the bottom**

There is no CA Dept. of Health Services. So, is it the CA Dept. of Health Care Services, CA Dept. of Public Health or another state agency?

51-6

**Page, 2-33, section 2.2.9.3**

There is no CA Dept. of Health Services. So, is it the CA Dept. of Health Care Services, CA Dept. of Public Health or another state agency?

For questions regarding the above section, please contact Gerry Villalobos at (626) 430-5540 or at [gvillalobos@ph.lacounty.gov](mailto:gvillalobos@ph.lacounty.gov).

51-6  
cont'd

**Land Use Program**

The Program authorizes the use of portable toilets on-site at CCL away from the main permanent facilities considering the waste disposal field as a continued construction site. Current permanent facilities must maintain their permanent restrooms, and future permanent facilities must provide permanent restrooms as well.

For questions regarding the above section, please contact Eric Edwards at (626) 430-5380 or at [eedwards@ph.lacounty.gov](mailto:eedwards@ph.lacounty.gov).

51-7

**Drinking Water Program**

This project qualifies as a Nontransient-Noncommunity Water System per California Regulation. A potable source of water from an onsite potable well in conformance to California Well Standards will be required for project approval. Bottled water is not an acceptable alternative. The only alternative to an onsite source would be a Will Serve letter from a Public Water System that states the amount (in gallons per day or equivalent) of non-interruptible drinking water on that particular system's letterhead and signed by the board or president of such water company.

For questions regarding the above section, please contact Richard Lavin or Epifanio Braganza at (626) 430-5420 or at [rlavin@ph.lacounty.gov](mailto:rlavin@ph.lacounty.gov) and [ebraganza@ph.lacounty.gov](mailto:ebraganza@ph.lacounty.gov).

51-8

**Toxics-Epidemiology Program**

After review of the DEIR, the Toxics-Epidemiology Program has no further comments.

For questions regarding the above section, please contact Robert Vasquez or Evenor Masis at (213) 738-3220 or at [rvasquez@ph.lacounty.gov](mailto:rvasquez@ph.lacounty.gov) and [emasis@ph.lacounty.gov](mailto:emasis@ph.lacounty.gov).

51-9

# Letter No. 51

Michelle Tsiebos  
Los Angeles County Department of Public Health  
5050 Commerce Drive  
Baldwin Park, CA 91706

## Response to Comment No. 51-1

Comment acknowledged.

## Response to Comment No. 51-2

Comment acknowledged. Please also see Topical Response #28, Waste Diverted.

## Response to Comment No. 51-3

Section 2.2.3.1 of the Final EIR has been revised to reflect the correct Solid Waste Facility Permit Number.

## Response to Comment No. 51-4

Original Draft EIR Section 2.2.3, Wastes to be Received, is a discussion of material proposed to be received for the Proposed Project. CCL does not currently receive any liquid waste, as Condition #9 of CCL's current Conditional Use Permit prohibits CCL from accepting liquid waste/material.

## Response to Comment No. 51-5

Please see Topical Response #34, Beneficial Use, for a discussion of nonhazardous contaminated soil, how it is used at CCL, and how its use is reported.

## Response to Comment No. 51-6

Final EIR Sections 2.2.8.4 and 2.2.8.5 (previously Sections 2.2.9.2 and 2.2.9.3) have been revised to correctly reference the California Department of Public Health.

## Response to Comment No. 51-7

Comment acknowledged. The future permanent facilities will have permanent restrooms. Current permanent facilities will also maintain their permanent restrooms until such time that the facilities are removed.

## Response to Comment No. 51-8

Comment acknowledged. The Department of Public Health has been provided a memorandum documenting that CCL does not qualify as a nontransient-noncommunity water system. As such, CCL is not required to provide either an onsite well or a will-serve letter from a public water system regarding the provision of drinking water. However, the Proposed Project does have a Water Supply Assessment, prepared by Valencia Water Company, documenting the availability of potable water for the Proposed Project when CCL transitions from its current water source to a permanent connection with Valencia Water Company.

## Response to Comment No. 51-9

Comment acknowledged.



City of  
**SANTA CLARITA**

**#52**

23920 Valencia Boulevard • Suite 300 • Santa Clarita, California 91355-2196  
Phone: (661) 259-2489 • FAX: (661) 259-8125  
[www.santa-clarita.com](http://www.santa-clarita.com)

October 20, 2014

Ms. Iris Chi  
County of Los Angeles  
Department of Regional Planning  
Zoning Permits North Section, Room 1348  
320 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Chi:

**Subject:** Comments to the Draft Environmental Impact Report for the Proposed Chiquita Canyon Landfill Expansion

The City of Santa Clarita (City) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed expansion of the Chiquita Canyon Landfill located on the north side of the intersection of Highway 126 and Henry Mayo Drive approximately seven miles west of the City boundary. The project site is of interest to the City because it is located in the Santa Clarita Valley and provides solid waste disposal services to both the City and the region. The proposed project consists of the development of an additional 143 acres of land to the existing landfill currently in operation.

The City would appreciate your consideration of the following comments on the Draft EIR prepared for the project:

**Hazards/Hazardous Materials (HM)**

As a Class III disposal facility, Chiquita Canyon Landfill is prohibited from disposing of hazardous waste, sewer sludge, or radioactive waste. Inclusion of the following additional mitigation measures to provide public assurance of ongoing compliance with this prohibition is recommended:

**HM1.** Continue to implement a rigorous load checking program in accordance with California Regional Water Quality Control Board and the Solid Waste Facility Permit requirements to ensure no illicit hazardous materials are accepted for disposal.

52-1



**HM2.** Continue to implement all load checking requirements of California Department of Toxic Substances Control and the California Department of Public Health to ensure no sewer sludge or radioactive materials are accepted for disposal.

**HM3.** Utilize recognized Best Management Practices (BMPs) for temporary storage and handling of household hazardous waste prior to shipping materials to recycling facilities or approved hazardous waste disposal sites.

52-1  
cont'd

**Water Quality (WQ)**

Protection of groundwater quality is mandated by stringent Regional Water Quality Control Board (RWQCB) permitting requirements, which mandate facility design, operations, and ongoing monitoring to prevent project impacts to water quality. Inclusion of the following additional mitigation measures to provide public assurance of ongoing compliance with water quality requirements is recommended:

**WQ1.** Design and construct the liner system and the Leachate Collection and Removal System in accordance with the Construction Quality Assurance plan, as approved by the RWQCB.

**WQ2.** Install and maintain a network of monitoring wells per the requirements of the RWQCB permit. Continue monitoring and data reporting, in accordance with the Monitoring and Reporting Program, as approved by RWQCB.

**WQ3.** Design and construct permanent BMPs to ensure site run-off does not adversely affect the Santa Clara River or downstream habitat in accordance with the RWQCB permit, the Los Angeles Department of Public Works SUSMP requirements, and the Los Angeles County Low Impact Development Ordinance.

52-2

**Air Quality (AQ)**

Protecting air quality from adverse impacts from landfill gasses is implemented by means of a Landfill Gas Monitoring Program as required by South Coast Air Quality Management District (SCAQMD), Environmental Protection Agency (EPA), and CalRecycle (formerly the California Integrated Waste Management Board). Inclusion of the following additional mitigation measures to provide public assurance of ongoing compliance with air quality requirements is recommended:

52-3

**AQ1.** Continue and expand the landfill gas collection system in accordance with the requirements of the SCAQMD permit, EPA New Source Performance Standards/Emission Guidelines, and Landfill Methane Capture regulations.

**AQ2.** Continue monthly monitoring of perimeter probes, onsite facility monitoring, and landfill surface monitoring for landfill gases, and ambient air sampling at the landfill site boundaries in accordance with the approved SCAQMD Rule 1150.1 Compliance Plan, EPA Emissions Guidelines, and CalRecycle Title 27 monitoring requirements.

52-3  
cont'd

#### **Traffic and Transportation**

The traffic analysis indicates there would be a 22-percent increase in daily traffic into and out of the landfill site with the proposed expansion. This additional traffic will cause increased traffic congestion and vehicular delay for residents and employees who live and/or work in the City, based on the proposed project trip distribution of 85 percent to/from the south on Interstate 5 and 7 percent to/from the east on Newhall Ranch Road. Of particular concern is the fact the majority of the projected increase in traffic will consist of trucks, which create more congestion than an equal number of smaller vehicles. In addition, 16 percent of the increased traffic is projected to occur during the peak morning commute period (6:00 a.m. to 9:00 a.m.), which will cause increased delay for motorists traveling southbound on Interstate 5 through the Santa Clarita Valley.

52-4

Due to the projected increases in traffic and the anticipated effects, the City is requesting preferred disposal rates and priority access to the landfill to offset the anticipated effects on Santa Clarita Valley residents. In addition, the City would like the landfill operator to partner with the City to implement the annual Bike to Work Day and Rideshare events. These events aim to reduce traffic in the Santa Clarita Valley by encouraging alternative forms of transportation and carpooling. A sponsorship from the landfill in the amount of \$5,000 for each event on an annual basis would assist the City with planning and promoting the events, educate local residents, and reduce overall traffic congestion.

#### **Overall Impact**

The cumulative impact of the proposed expansion of the landfill will be felt by City residents and businesses. Both traffic and air quality will be affected. The City is requesting preferred disposal and composting rates for the use of the landfill and future facilities, currently proposed, such as composting, waste to energy, and materials recovery facilities. This will ensure locally generated material is processed by local facilities, which in turn will minimize the potential for long truck

52-5

trips resulting in higher emissions and increased traffic congestion.

In addition to the above comments on the draft environmental document, the City offers the following comments on the proposed project itself and its future operations within the community:

52-5  
cont'd

#### **Landfill Operation**

##### *Origin of Solid Waste*

The project proposes an increase in the amount of staffing to operate the landfill. As proposed, new staffing will include additional workers at the scale house. With the increased staffing levels, the City requests all landfill customers have their full waste origin recorded, including the street name and number, city, and zip code for each load brought to the facility. Having the additional information recorded will enhance the accuracy of the waste origin. Currently, the landfill operator is recording only the jurisdiction's name.

52-6

#### **Household Hazardous Waste Facility (HHWF)**

##### *Public Access to the Proposed HHWF for Santa Clarita Residents*

The project would establish a Household Hazardous Waste Facility to be open for the public to drop-off common household chemicals for proper recycling and disposal. To best serve Santa Clarita residents, the City requests the facility maintain weekend operating hours each week to ensure the community has access to drop-off materials outside of normal business hours.

52-7

#### **Mixed Organic Composting Facility**

##### *Support the City's daily efforts to divert organic material from the landfill*

The project should be required to maintain the continued use of an onsite green waste processing and composting operation, which is still part of the current conditional use permit for the site. The permitted volume is currently set at 560 tons per day. The City is requesting a minimum of 100 tons per day of that capacity be set aside to accept material from the City's curbside green waste program. If the landfill allows pre- and post- consumer food waste as part of a future "mixed organic" collection program, the City is requesting an additional 20 tons per day of commercial food waste generated in the City receive priority status as feedstock for the program. Assisting the City and local businesses with this effort will minimize the risk of organics unnecessarily being landfilled.

52-8

**Materials Recovery Facility (MRF)**

*Eliminate the acceptance of self-haul materials from the public*

The current conditional use permit allows the landfill operator to construct a Materials Recovery Facility at the landfill site. If the operator decides to build a facility or if a local MRF is constructed in the Santa Clarita Valley, the City requests the landfill operator be required to eliminate the acceptance of self-haul waste to increase diversion and recycling. This change in operation will reduce the possibility of waste being misallocated to the wrong jurisdiction of origin.

52-9

The City appreciates the opportunity to comment on the Proposed Chiquita Canyon Landfill Expansion Project DEIR. If you have any questions, please contact me at (661) 284-1429.

Sincerely,



Robert Newman  
Director of Public Works

RN:CW:eg

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cc: Santa Clarita City Council  
Santa Clarita Planning Commission  
Leadership Team  
Rosalind Wayman, Senior Deputy, Office of Supervisor Antonovich  
Edel Vizcarra, Planning Deputy, Office of Supervisor Antonovich

# Letter No. 52

Robert Newman  
City of Santa Clarita  
23920 Valencia Boulevard, Ste. 300  
Santa Clarita, CA 91355-2196

## Response to Comment No. 52-1

The recommended mitigation measures are operating practices already required for a Class III landfill via various regulatory mechanisms and do not reflect measures needed to mitigate potentially significant impacts. Please also see Topical Response #29b for a discussion of the Waste Screening and Acceptance Program at CCL.

## Response to Comment No. 52-2

As pointed out by the City of Santa Clarita, protection of groundwater quality is mandated by stringent Regional Water Quality Control Board permitting requirements. Each of the proposed mitigation measures are operating practices already required for a Class III landfill via various regulatory mechanisms and do not reflect measures needed to mitigate potentially significant impacts. Please also see Topical Response #30 for a discussion of Water Quality.

## Response to Comment No. 52-3

The recommended mitigation measures are operating practices already required for a Class III landfill via various regulatory mechanisms and do not reflect measures needed to mitigate potentially significant impacts. Please also see Topical Response #1 for a discussion of Air Quality.

## Response to Comment No. 52-4

There is no nexus between the request for preferred disposal rates and priority access to the landfill and the potential for increased traffic in the Santa Clarita Valley.

Discussions between CCL and the City of Santa Clarita regarding the provision of additional community benefits for Bike to Work Day and Rideshare events will be conducted outside of the environmental review process for the Proposed Project.

## Response to Comment No. 52-5

Discussions between CCL and the City of Santa Clarita regarding preferred waste disposal and composting rates will be conducted outside of the environmental review process for the Proposed Project.

## Response to Comment No. 52-6

Additional staff required for the Proposed Project does not include additional staffing at the scalehouse. In fact, in the future, scalehouse operations may become automated for its commercial customers, where commercial drivers gain access to the landfill via use of RFID (radio frequency identification) devices, or similar.

CCL will investigate means of acquiring the requested information from self-haulers who indicate their waste origin in the City of Santa Clarita, for use by the City of Santa Clarita, in such a way that queue time at the scalehouse is not impaired. Any means of acquiring such information must be compatible with current transaction times at the scalehouse and administrative responsibilities.

## Response to Comment No. 52-7

Please see Topical Response #13 for a discussion of the Household Hazardous Waste Facility (HHWF). The HHWF may be operated by Los Angeles County or a third party selected by the County. Exact days and hours of operation will be set by the County, but weekend operation is anticipated.

## Response to Comment No. 52-8

The Proposed Project includes a potential onsite green waste processing and composting operation, and CCL is interested in assisting the City and local businesses with efforts to minimize landfill disposal of organics.

Any discussions between CCL and the City of Santa Clarita regarding capacity set-aside for the City or priority status for the City would be conducted outside of the environmental review process for the Proposed Project.

## Response to Comment No. 52-9

The Proposed Project does not include construction or operation of a Materials Recovery Facility at CCL.

To reduce the possibility of waste being misallocated to the wrong jurisdiction of origin, CCL will investigate means of acquiring the requested information from self-haulers who indicate their waste origin in the City of Santa Clarita, for use by the City of Santa Clarita, in such a way that queue time at the scalehouse is not impaired. Any means of acquiring such information must be compatible with current transaction times at the scalehouse and administrative responsibilities.



*Dr. I. Faye Snyder*  
Faye Snyder, PsyD  
30263 Trellis Road  
Val Verde, CA 91384-2484  
(661) 257-1311

#53

October 20, 2014

**Via Electronic Mail**

Iris Chi  
Zoning Permits Section Room 1345  
Los Angeles County Department of Regional Planning  
320 W. Temple Street  
Los Angeles California 90012

Re: Chiquita Canyon Landfill Expansion Draft Environmental Impact Report

Project No. R2004-00559-(5) SCH No. 2005081071

**Informed Decisions and the Request for Air Quality Monitors before evaluating the DEIR.**

Dear Ms. Chi:

First, I am submitting a document I wrote to try to explain the alleged indifference of Val Verde residents. First, we are not indifferent. We voted 114 to 0 at the Val Verde Civic Association to reject the landfill. (See attachment.) We have been accused of not significantly objecting to the landfill, especially the residents closest to it. I have written a document about how residents suffer from “learned helplessness” and other psychological compounding factors impacting residents, which I am attaching, because we have had so much experience being discredited and neglected.

If the DEIR is written to make us feel safe, with all the public relations surrounding it, we are more convinced that we are being misinformed, deliberately. If the DEIR represents that monitors, which have no relevance to the landfill, are measures of our safety, then we can only conclude that the rest of the document is a public relations endeavor. The reference to monitors that are at remote distances is ludicrous and leaves us feeling scammed by powers that owe us accuracy.

The treatment of residents has been demoralizing. According to Anthony Bell and EdelViscara from Mr. Antonovich’s office at The Board of Supervisors, they were told that Val Verde is divided. Fortunately there was a subsequent vote to derail that myth. Since we have been given a DEIR supported by a lot of public relations to sway our opinion, many residents may not have noticed that the DEIR is based upon a faulty premise, that our air is safe, however **bad the smell.**

Also, The smell is so bad on 126 at night that I wonder what the county will do when the new tract of houses on the other side sit empty, because the stinch is so strong? What will the county do when residents sue for having been misled about the length of the present landfill’s life and depth?

Additionally, what kind of planning is involved when a landfill is maxed out less than 1000 feet from residents, the largest in the nation, and they want to make it fit? We could have been sending our trash by rail out to the remotest areas of the desert, which would be *real* planning. What is *this*? It looks like sacrifice to me.

Sincerely yours,  
*Faye Snyder, PsyD*

See Attachment.

53-1

53-2

53-3

53-4

**Psychological Factors Affecting Residents**

**Near Landfills**

**By Faye Snyder, PsyD**

**To the children of Val Verde**

53-5

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## **Psychological Factors Affecting Residents Near Landfills**

**By Faye Snyder, PsyD**

### **INTRODUCTION**

Dumpsites are pure karma. They are the results of our economy and our social customs of consumption. Our economy depends upon sales of goods and we are persuaded in ads that we must purchase and ultimately replace more and more in order to be fulfilled. Yet, ultimately everything we use becomes waste. Some of us imagine how much waste there is per person and we begin to recycle, carrying an awareness of the big picture and the danger to the entire planet. Some of us don't think about it. Some of us don't care.

There is no doubt that we use and waste more than we need. There is no doubt that we have been greedy and careless. The thing is: it isn't fair for some communities to absorb the karma for everyone.

Here we are, residents of Val Verde, some land owners, some renters. Some of us are well educated, and some of us are poor laborers, living in harmony side by side. We live together in what was to be a charming little village of tiny mountains and historic trees, with ancient riverbeds running through out town, breathing the toxins of leftovers from those who don't give us a second thought.

### ***SYMPTOMS AND SELF-DOUBT***

#### ***What If It's All In Your Head?***

If you think that you have medical problems developing from the nearby dump, you need to see a doctor and have your symptoms checked out. If it turns out that you are wrong, and nothing ails you, there is always the possibility that you have an incompetent doctor or a doctor who missed the evidence that you do have medical problems resulting from the nearby dump. Sometimes it is important to get a second opinion.

If you get a second opinion, and there is still no evidence that you are suffering from something real, but that does not relieve you, you are still suffering from anxiety. If this were a Workers Comp case (but it is not), you would lose on the physical component of your case without evidence of your condition, but you might still have a claim for the mental component. Of course, a psychologist evaluating your case would be able to tell if you were exaggerating or faking.

If your symptoms cannot be substantiated, you won't prove that the chemical effects of the dump are physically harming your body. History is filled with cases where people share a common and incorrect projection. Sometimes even insanity can be contagious.

The worst problem with psychosomatic symptoms is that they lack credibility. When you live with a dump beside your entire community, credibility matters. It is a problem when an argument is made against us that we are all imagining our symptoms.

### ***Can You Develop Symptoms Anyway?***

Even a paranoid personality can be the victim of stalking, and, of course you can still develop symptoms in the future. You may be developing symptoms now that are yet undetectable, or, in the most rare cases you can manifest real symptoms if you worry hard enough, long enough.

It's better to find a way to manage your worst fear than to live in dread. Living in dread is no way to live at all. It would be better to leave or figure out which is truly worse for you, giving up everything in order to get away or living in dread.

Perhaps, all you need is bona fide reassurance, something we are not getting.

### ***What If It's Not In Your Head, But You Are Not Believed?***

This is where we take a look at this type of emotional pain. It is the rub. This is a double-damned situation. Not only are you suffering from real physical issues but neither are you believed. This can happen to an individual. It can happen to a community. By happening to a community, a substantial number of individuals suffer real symptoms but are not believed. These residents would likely be those who are in the closest proximity to the dumpsite, who live downwind, who are malnourished, who are the youngest or the oldest or who have immune deficiencies or other illness, as well.

There is only one way living near a dump will not ultimately cause physical symptoms. That is if the dump has been designed so that physical illnesses will not develop, because the contaminants are sufficiently and scientifically managed. If this were the case, the managing parties involved would know how to reassure us with evidence of all the measures they have taken to protect us. They would be understanding of our concerns and they would be prepared with real science and real preventive measures, whether it be putting up taller hills, walls and trees, developing ways to neutralize the offending chemicals or other measures. Perhaps, they would offer a clinic that all the residents could visit at any time for blood or hair follicle tests. Perhaps we would be able to check the air quality with meters located around our community, something we were initially promised. Instead, we learn that they want to raise the height of the dump and lower the horizon of the hills, putting us at greater risk.

Perhaps, those who develop physical symptoms can be bought out, so they can afford to move. Maybe there can be benefits for living here, with everyone forewarned before moving in. Maybe the property is very cheap, and the children qualify for tutoring and young adults qualify for scholarships, safety from crime and free medical care. Perhaps some chose to enjoy the beauty of the surrounding environment at the risk of illness, a gamble they choose to take. To some extent, we are partially there, but we were not forewarned. We were promised a limit of 20 years, something we thought was nearly up.

There may be a number of reassurances available to us, or history may prove that there is no way to mitigate the risks of living near a dumpsite, ever. One study of residents near a dumpsite reported on the psychological and experiential factors in the community. While the primary complaints were of odor, smoke (from burning trash), rodents, flies, aesthetics and water pollution, as well as nausea, diarrhea, weakness, headaches or other symptoms, psychological disturbances were amongst the most common complaints (Olorunfemi, 2009). Psychological disturbances resulting from a landfill can include self-doubt, mistrust of authority, paranoia, anxiety and fear, hypochondriasis, and infighting amongst neighbors. Of course, all of these complaints may be psychological, but they may also be true.

While it is a matter of serious concern that you have physical symptoms and need medical care, it is also a matter of serious concern that you do not lose your own ability to know your own body and to trust yourself. Once the process begins where we are disregarded and

given feedback that there is nothing dangerous in the smells, we learn to second-guess ourselves. This is similar to another way to create schizophrenia in early childhood. When a person—any person—is given enough reason to question their own feelings and perceptions another type of suffering begins: self-doubt. The experience of learning our point of view is inconsequential or that our thoughts and feelings are wrong, no matter the evidence, creates emotional pain. Then, there are those who dissociate from the messages of the smells, and cease to smell them. Like cigarette smokers with emphysema, they pretend. It's called denial.

A research study of “subjective exposure” versus “objective exposure” determined that the predictor of poor health was just as accurate from subjective reports as from scientific measures. In other words, the aggregate reports from residents that they are experiencing illness from the toxins is just as accurate as surveys, blood samples and other objective means of data sampling (Peek, 2009).

### **ISSUES OF INVESTMENT**

Our landfill near Val Verde, like any dumpsite, is loaded with issues of investment, whether residents or financiers of the landfill. Some residents rent, but could more easily leave. Some do leave. Some stay, because it's the only rent they can afford or they don't understand the risk. Some stay because they live here; their families live here; their ancestors lived here. Some believe the threat will be terminated soon, or at least that it will not grow, and perhaps this part of the earth will begin to mend soon, something that will actually take hundreds of years. In any event, this is our town. It is our home, and home is a sacred place, not just for animals, but for people too. We are prone to return home, even when it's dangerous. We are also prone to see what we want to see and believe what we want to believe about our home.

### **AUTHORITIES**

The owners and representatives of the dumpsite have a financial investment in preserving the site. We could almost feel bad for them. When one has an investment in something, they don't want to see threats against it. There are few more compelling reasons to invest in something than money. History is full of legacies between the haves and the have-nots. The haves often believe they can control the have-nots with beliefs, such as there is nothing dangerous about living next to a dumpsite. Their bottom line is that they want to make as much money as possible, spending as little as possible. They would probably like to have their landfill without having to incur any costs of making it safe. In this motive there will be found the underlying need for deception.

Haves also have a legacy of recruitment. Without recruiting people to believe, they could not function, especially in a democracy. They need numbers to believe in them. They need majority support for their endeavors to exploit others. This is done a number of ways. They can convince us that without them, we would be worse off. They can buy off some key citizens. They can tell us we are wrong or, worse, crazy. They can use intimidation. In another study it was learned that the degree of trust of the authorities affected the perception of health risk (Lopez-Navarro, et al. 2013.) How they treat us affects our trust and gives us reason to believe we do not matter to the investors in the dumpsite.

Recent research suggests that the well-being of individuals and communities is impacted as much by the decision-making process as the outcome itself. We are affected by feelings of disempowerment, perceived hostility from authority figures and dividedness between us in our community. These experiences, resulting from a perceived lack of meaningful participation, lead to feelings of uncertainty, rebellion or hopelessness (Wakefield and Elliott, 2000, p. 1139).

Authorities can control us with bureaucracy. While it can be a very useful tool to organize many aspects of social living, bureaucracy can be a tool for refusing to recognize our humanity. It can become an answering device, a pat answer, or it can include a requirement that is nearly impossible to meet.

One way to manipulate the residents of Val Verde in the past was to pit us against one another, especially to generate rumors about the good leadership to discredit them. Just find their weak spot, and use it against them. If you can't find a weak spot, make one up.

Many of us complain that we have been treated badly by Supervisor Mike Antonovich's office. Some Val Verde leaders believe that on occasion they are being followed or watched. Some community members express beliefs that there is collusion between the landfill and Newhall Land and Development. When a number of us were interviewed by the Signal on two occasions, we discovered that the newspaper only quoted those supporting the landfill. It begins to appear to be an alliance of major wealth in Santa Clarita. We wonder how much collusion is involved between the powers that be, whether or not we can trust and whether or not we are safe. The more the authorities appear to be untrustworthy, the more likely we will worry about our health and rightly so.

### ***NEIGHBORS***

What works well or poorly for authorities is our predisposition toward authority. As children, we are raised to believe that the grown-ups know what they are doing, and they would never misguide us. Some of us know that grown-ups don't always know what they are doing, but we have learned to praise them anyway, for our own benefit or survival. Some of us have been raised to keep the peace. Nevertheless, some of us have been raised with permission to make judgment calls and to critique problems and solutions, while others of us have been raised to disdain authority, whether because our parents did, or because we were mistreated so much we have no reflex to protect authority.

Residents of the same community can look at the same phenomenon and see different things. They can meet the same representatives of the dumpsite and see different characteristics. Some see a good guy where others see a bad guy. Some trust, while others see manipulation. That is, some see their parents positively and others don't. It's their histories talking to them. Those who are clear about the influences of their own histories are more likely to see clearly positive and negative characteristics in a representative. They would make better negotiators and better leaders.

Some have been struggling for so long without enough positive results that they can be bought by money, kindness or power. Some have been offered positions of authority sufficient that they will believe and advocate anything. Some can be funded for this reason or that, and even corruption may develop in our own back yard.

One of the problems with dumpsites is that the nearby residents begin to quarrel. The question of what is right and true becomes muddied. Those with correct insights may have terrible relationship skills, while those with misinformation may be charming.

One of the greatest psychological complications, which affect residents near a landfill is the "learned helplessness" of the most affected residents (Seligman, 1975). People who have been conditioned to accept defeat, who have lived with the smell day after day, who have called to complain to no avail, who see the writing on the wall that they will not be rescued, who cannot afford to move, are likely to appear to be disinterested in the situation. Those who are for the landfill, can make hay with this, claiming that residents don't care. It is a way we survive trauma. We dissociate from our problem and try to go through life, as if nothing is wrong.

There is another built-in hazard to our community. We have residents who are homeowners and residents who are renters. Many of the renters came to America for a better life,

and believe America promises benefits, as well as opportunity. On the other hand, those who are qualified to deal with authorities of the landfill, who have enough education to negotiate a contract, who have enough education to sort out innuendoes and identify false promises, are needed for leadership in Val Verde. Perhaps, what the renters and the poor need to do is identify which leaders of Val Verde truly have lived lives helping people without discrimination.

Rationally, a substantial amount of the money for Val Verde must be protected and invested, a solid business principle. Another inherent purpose of the money was to protect or develop property value of homeowners, so that the worth of Val Verde land would not go down due to the dumpsite. Finally, it was important that the poor (and ideally all residents) have access to free medical treatment. It was also important to give the children of the poor something to do to stay out of trouble and to get a chance to get ahead. Hence, sports and tutoring were implemented. Tutoring didn't work, because the qualified teachers paid to tutor were removed, even though the money reportedly continued to be paid out.

### **CONCLUSION**

We have a lot of decisions to make. Some of us have personal decisions to protect our families and ourselves. Others have decisions to make to protect the community. Hopefully, those who argue that there is nothing wrong with the dumpsite will be politely disregarded. Hopefully, the leadership in Val Verde has learned from previous mistakes and the most qualified to lead will step up again.

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*Dr. Faye Snyder*

DR. S. FAYE SNYDER, A PROFESSIONAL CORPORATION

**RECEIVED**  
OCT 23 2014  
BY: \_\_\_\_\_

October 20, 2014

Iris Chi  
Zoning Permits Section Room 1345  
Los Angeles County Department of Regional Planning  
320 W. Temple Street  
Los Angeles California 90012

Re: Chiquita Canyon Landfill Expansion Draft Environmental Impact Report

Project No. R2004-00559-(5) SCH No. 2005081071

**Informed Decisions and the Request for Air Quality Monitors before evaluating the DEIR.**

Dear Ms. Chi:

As a resident of Val Verde, I am concerned about the draft environmental impact report, because **no intelligent decision can be made by anyone without information from the air quality monitors** we were promised in 1997. The DEIR has been based upon air quality monitors in Reseda and Burbank, as well as Newhall (still much too far away to be relevant). Even if the latter monitor were placed nearby, according to the most recent information available, the Newhall monitor doesn't measure vinyl chloride, sulfur dioxide and particulate matter. Thus, the entire DEIR evaluation is hypothetical and based upon useless data.

If we had air quality monitors—[1] for radiation, [2] for methane (CH<sub>4</sub>), [3] ammonia (NH<sub>3</sub>), [4] vinyl chloride (C<sub>2</sub>H<sub>3</sub>Cl), [5] nitrogen dioxide (NO<sub>2</sub>), [6] sulfur dioxide (SO<sub>2</sub>), [7] hydrogen sulfide (H<sub>2</sub>S), [8] carbon monoxide (CO), [9] ozone (O<sub>3</sub>), [10] PCBs or polychlorinated biphenyl (C<sub>12</sub>H<sub>10-x</sub>Cl<sub>x</sub>), [11] particulate matter with aerodynamic diameters equal to or less than 10 microns (PM<sub>10</sub>) and equal to or less than 2.5 microns (PM<sub>2.5</sub>), [12] diesel fumes and [13] visually obstructive matter—posted in the vicinity of Lincoln Avenue and central Val Verde, and if the county provided neutral, trained air quality monitor “readers” (professional evaluators) and record-keepers, we would not be speculating about whether or not the landfill is dangerous. We would know exactly what needs to be done for it to be safe or whether it is too dangerous for animals and human health in Val Verde to extend and expand the landfill. At this point the argument to find places to dump garbage in remote areas would become poignant, rather annoying, and it would no longer be necessary to speculate whether we are heroes or alarmists. Then, we would know what we were bargaining for. Air quality monitors in Val Verde would be the great clarifier.

Thank you for your time.

Sincerely yours,



*Faye Snyder, Psy.D.*  
30263 Trellis Road  
Val Verde, CA 91384-2484

PSYCHOLOGIST, MARRIAGE AND FAMILY THERAPIST  
CAUSAL THERAPIST CERTIFIED IN LIFESTYLE  
Clinical Director and Founder, PaRC Foundation

LIC #PSY24806  
LIC #MFC20816

Parenting and Relationship Counseling Foundation • 15650 Devonshire St. • Suite 210 • Granada Hills, CA 91344 • (818) 891-8477

AGENCY: thePaRCfoundation.com    RESEARCH: theCausalTheory.com    FORENSICS: DrSFayeSnyder.com    OUTREACH: DrFayeSnyder.com

# Letter No. 53

Faye Snyder, PsyD  
30263 Trellis Road  
Val Verde, CA 91384-2484

## Response to Comment No. 53-1

Please see the following Topical Responses:

- #9, Environmental Justice
- #10, Environmental Monitoring
- #17, Odor
- #21, Public Health

## Response to Comment No. 53-2

Please see Topical Response #17, Odor.

## Response to Comment No. 53-3

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

## Response to Comment No. 53-4

The Los Angeles County Department of Public Works (LACDPW) has a Countywide Integrated Waste Management Plan (CIWMP), for which it prepares Annual Reports. The CIWMP documents the County's ongoing efforts to secure adequate waste disposal capacity to meet the needs of County residents for a 15-year planning period.

## Response to Comment No. 53-5

Comment acknowledged.





Los Angeles County  
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner  
Director

WRITTEN COMMENT CARD

DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR  
CHIQUITA CANYON LANDFILL MASTER PLAN REVISION  
PROJECT NO.: R2004-00559-(5)

Name Ira de Clair  
Address 29012 EVENINGSIDE DR  
Affiliation CATAIC, CA 91384  
Phone 661-294-3848  
Date 10/20/14

We welcome your participation. Submit comments at the Hearing Examiner Public Hearing or mail to:  
  
Los Angeles County Department of Regional Planning  
ATTN: Iris Chi  
320 West Temple Street  
Los Angeles, CA 90012  
  
Please note that the deadline for public comments is September 23, 2014.

COMMENTS:  
(Attach additional sheets if necessary)

No (Dump) Extension for Chiquita Cyn  
Landfill ENVIRONMENTAL impact too great.  
Toxins, & Hazardous materials not wanted here.



Los Angeles County  
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner  
Director

WRITTEN COMMENT CARD

DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR  
CHIQUITA CANYON LANDFILL MASTER PLAN REVISION  
PROJECT NO.: R2004-00559-(5)

Name Margaret Bruck  
Address 30054 Mayboro  
Affiliation Costa Mesa CA 92626  
Phone 661-257-3679  
Date 10-20-2014

We welcome your participation. Submit comments at the  
Hearing Examiner Public Hearing or mail to:

Los Angeles County Department of  
Regional Planning  
ATTN: Iris Chi  
320 West Temple Street  
Los Angeles, CA 90012

COMMENTS:  
(Attach additional sheets if necessary)

Please note that the deadline for public comments is  
September 23, 2014.

We have a bad smell over here, every  
once in awhile. If you bags on adding  
I more trash the smell will get worse.  
Plus I am worried they will take some  
of the hills down. Also I always worry  
about there could be some different chemical  
there.

54-2

Blank lined area for additional comments.



Los Angeles County  
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner  
Director

**WRITTEN COMMENT CARD**

**DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR  
CHIQUITA CANYON LANDFILL MASTER PLAN REVISION  
PROJECT NO.: R2004-00559-(5)**

Name JOHN CRIST  
Address 29004 CONCOURSE DR, GERRIC 91384  
Affiliation RESIDENT OF VALVERDE  
Phone 661-775-8192  
Date 10-20-2014

We welcome your participation. Submit comments at the Hearing Examiner Public Hearing or mail to:

Los Angeles County Department of  
Regional Planning  
ATTN: Iris Chi  
320 West Temple Street  
Los Angeles, CA 90012

**COMMENTS:**  
(Attach additional sheets if necessary)

Please note that the deadline for public comments is  
September 23, 2014.

I am opposed to enlarging the Chiquita Canyon Landfill Project NO: R2004-00559-(5). They do not control the dumping very well as it is. Where is the environmental controls for tires, electronics and toxic wastes. We do not need any more exposure.

54-3



Los Angeles County  
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner  
Director

WRITTEN COMMENT CARD

DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR  
CHIQUITA CANYON LANDFILL MASTER PLAN REVISION  
PROJECT NO.: R2004-00559-(5)

Name Charles Rayton  
Address 29257 Sheridan Rd  
Affiliation Castaic Ca  
Phone (661) 294-3006  
Date 10-20-14

We welcome your participation. Submit comments at the  
Hearing Examiner Public Hearing or mail to:

Los Angeles County Department of  
Regional Planning  
ATTN: Iris Chi  
320 West Temple Street  
Los Angeles, CA 90012

COMMENTS:  
(Attach additional sheets if necessary)

Please note that the deadline for public comments is  
September 23, 2014.

No I don't want the dump expanded to  
Val verde because of the smell, Health, traffic.  
who would want to live with a Dump in their Back  
yard? my family has been here since ~~1947~~ 1947.  
we don't want to live in trash.

54-4

Charles Rayton



Los Angeles County  
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner  
Director

**WRITTEN COMMENT CARD**

**DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR  
CHIQUITA CANYON LANDFILL MASTER PLAN REVISION  
PROJECT NO.: R2004-00559-(5)**

Name Garcia de Cleir  
Address 29012 Eveningside dr  
Affiliation \_\_\_\_\_  
Phone 661 294 3848  
Date October 20th 2014

We welcome your participation. Submit comments at the Hearing Examiner Public Hearing or mail to:

Los Angeles County Department of  
Regional Planning  
ATTN: Iris Chi  
320 West Temple Street  
Los Angeles, CA 90012

**COMMENTS:**  
(Attach additional sheets if necessary)

Please note that the deadline for public comments is September 23, 2014.

No Dump please, Cancer causing  
toxins in the ground, take it  
to the desert, 1 small battery  
polluted 1 million Gals of water

54-5





Los Angeles County  
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner  
Director

**WRITTEN COMMENT CARD**

**DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR  
CHIQUITA CANYON LANDFILL MASTER PLAN REVISION  
PROJECT NO.: R2004-00559-(5)**

Name Neva Murray  
Address 30157 Sepington Dr  
Affiliation live in Val Verde  
Phone \_\_\_\_\_  
Date 10/21/2014

We welcome your participation. Submit comments at the Hearing Examiner Public Hearing or mail to:

Los Angeles County Department of  
Regional Planning  
ATTN: Iris Chi  
320 West Temple Street  
Los Angeles, CA 90012

**COMMENTS:**  
(Attach additional sheets if necessary)

Please note that the deadline for public comments is  
September 23, 2014.

I have not spoken to even one person who lives in Val Verde <sup>who</sup> want the landfill be enlarged. Not only will expose us to terrible odors it harm the wild life around here. We all need protection from some things that the landfill takes in.

54-7



Los Angeles County  
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner  
Director

WRITTEN COMMENT CARD

DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR  
CHIQUITA CANYON LANDFILL MASTER PLAN REVISION  
PROJECT NO.: R2004-00559-(5)

Name Gilbert Lopez  
Address 30157 Lexington Dr  
Affiliation Resident of Val Verde Co  
Phone 661-295-0941  
Date 10/21/04

We welcome your participation. Submit comments at the  
Hearing Examiner Public Hearing or mail to:

Los Angeles County Department of  
Regional Planning  
ATTN: Iris Chi  
320 West Temple Street  
Los Angeles, CA 90012

COMMENTS:  
(Attach additional sheets if necessary)

Please note that the deadline for public comments is  
September 23, 2014.

I as A Resident of Val Verde  
Have seen Tires, Oil, Computer parts and All kinds of  
Electrical parts such as T.V.'s and Radios Cinder  
Blocks & Cement and Employees just watching  
As people throw all of this away they have no  
control at all

54-8



Los Angeles County  
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner  
Director

WRITTEN COMMENT CARD

DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR  
CHIQUITA CANYON LANDFILL MASTER PLAN REVISION  
PROJECT NO.: R2004-00559-(5)

Name KIANOUSH ZADEH  
Address 30156 Lexington  
Affiliation RESIDENT  
Phone 661-257-1709  
Date 10/21/2014

We welcome your participation. Submit comments at the Hearing Examiner Public Hearing or mail to:

Los Angeles County Department of  
Regional Planning  
ATTN: Iris Chi  
320 West Temple Street  
Los Angeles, CA 90012

COMMENTS:  
(Attach additional sheets if necessary)

Please note that the deadline for public comments is  
September 23, 2014.

I am concerned about the traffic on the highway 126. There has been numerous fatal accidents due to dump trucks crossing. The dumpis on the freeway is the problem. Most traffic is going to make a left hand crossing the freeway I see that every day I take the freeway increasing capacity will exacerbate the problem. Putting a right for dump is worse as there are many accident on exiting right on Commerce drive and 126 Highway. couple years ago a Jaguar driver and his wife died. it happened be cause a dump truck blew it's tire and lost control and hit the Jaguar head on, killing both passengers. I have seen numerous other accidents due to trucks trying to cross 126, most of their business comes from that direction.

54-9

# Letter No. 54

## **Multiple Comment Cards**

Ira de Cleir  
29012 Eveningside Drive  
Castaic, CA 91384

Margaret Burk  
30054 Mayfair  
Castaic, CA 91384

John Crisp  
29094 Concourse Drive  
Castaic, CA 91384

Charles Payton  
29257 Sheridan Road  
Castaic, CA 91384

Gerald de Cleir  
29012 Eveningside Drive  
Castaic, CA 91384

Sean O'Brien  
29029 Eveningside Drive  
Castaic, CA 91384

Neva Murray  
30157 Lexington Drive  
Val Verde, CA 91384

Gilbert Lopez  
30157 Lexington Drive  
Val Verde, CA 91384

Kianoush Zadeh  
30156 Lexington Drive  
Val Verde, CA 91384

## Response to Comment No. 54-1

CCL is a Class III Municipal Solid Waste Landfill and cannot accept hazardous waste for disposal.

## Response to Comment No. 54-2

Please see Topical Response #17, Odor. No ridgelines surrounding the landfill will be removed for the Proposed Project. In addition, please see Topical Response #29, Wastes to be Disposed and Waste Screening and Acceptance Program.

## Response to Comment No. 54-3

Please see Topical Response #29, Wastes to be Disposed and Waste Screening and Acceptance Program.

#### Response to Comment No. 54-4

Please see Topical Response #17, Odor, and Topical Response #25, Traffic.

#### Response to Comment No. 54-5

Please see Topical Response #29, Wastes to be Disposed and Waste Screening and Acceptance Program.

#### Response to Comment No. 54-6

Comment noted.

#### Response to Comment No. 54-7

Please see Topical Response #17, Odor, and the Biological Resources chapter of the Final EIR. In addition, please see Topical Response #29, Wastes to be Disposed and Waste Screening and Acceptance Program, and Topical Response #10, Environmental Monitoring.

#### Response to Comment No. 54-8

Please see Topical Response #29b for a discussion of the Waste Screening and Acceptance Program and Partially Recirculated Draft EIR Chapter 2, Project Description, Section 2.2.6.4, Load Checking and Waste Screening.

#### Response to Comment No. 54-9

Please see Topical Response #25, Traffic, for a discussion of potential traffic impacts on State Route 126 (SR-126).



**VENTURA COUNTY  
AIR POLLUTION CONTROL DISTRICT**  
Memorandum

TO: Laura Hocking/Lori Gregory, Planning

DATE: October 21, 2014

FROM: Alicia Stratton

SUBJECT: Request for Review of the Draft Environmental Impact Report for the Chiquita Canyon Landfill Master Plan Revision, County of Los Angeles (Reference No. 11-036-1)

Air Pollution Control District staff has reviewed draft Environmental Impact Report (DEIR), which is a proposal for the existing landfill, consisting of 257 acres and a maximum daily permitted disposal of 6,000 tons per day, to develop a new entrance and support facilities, to better utilize the landfill's potential disposal capacity through a lateral extension of the existing waste footprint and increased maximum elevation, increased daily disposal limits, acceptance of all nonhazardous wastes permitted at a Class III solid waste disposal landfill, continued operation of the landfill, new design features, environmental monitoring, development of a Household Hazardous Waste Facility, mixed organics composting operation and set-aside of land for future potential conversion technology. In addition, the project includes relocation of a portion of Southern California Edison's existing Saugus-Elizabeth Lake-Fillmore 66 kilovolt Subtransmission Line in order to accommodate landfill improvements. The project location is 29201 Henry Mayo Drive in the unincorporated Castaic area of Los Angeles County.

55-1

Because this project is located in Los Angeles County, the South Coast Air Quality Management District is the regulatory agency overseeing air quality issues pertaining to the project. However, because it is adjacent to Ventura County, air quality impacts may occur in Ventura County. We have reviewed South Coast Air Quality Management District's comments on this project and we concur with their comments and recommendations regarding air quality. We wish to submit the following comments as well:

Ventura County Air Pollution Control District previously commented on this project's notice of preparation for the DEIR (January 10, 2012 memo from Alicia Stratton), where we requested that the DEIR evaluates all potential air quality impacts resulting from the project that may affect Ventura County (directly west of the project area). Specifically, we recommended that the air quality assessment should consider reactive organic

compound and nitrogen oxide emissions from all project-related motor vehicles and construction equipment. If the project were determined to have a significant impact on regional and/or local air quality affecting Ventura County, the DEIR should have included all feasible mitigation measures applicable to Ventura County impacts. We also requested that the Draft EIR clearly state that all feasible air quality mitigation measures included in the document would be fully implemented if the project were approved. The DEIR contains no mention of potential air quality impacts to Ventura County. The only specific reference to geographic locations other than the landfill site itself pertaining to the project emissions is found in Appendix H, wherein it states that regarding truck emissions, it was assumed that only the emissions associated with travel along the road from the Interstate 5 are associated with this project. Therefore, it can be assumed that no traffic associated with the Landfill Master Plan Revision would be in Ventura County.

55-1  
cont'd

Section ES.6.8 of the DEIR addresses air quality issues. This discussion indicates that PM10 annual and PM10 and PM2.5 24-hour cumulative concentrations would exceed their respective thresholds under the cumulative project scenario during two modeled project years, primarily due to fugitive dust from travel on onsite paved roads. It was determined that mitigation needed to reduce this impact (continuous watering of onsite paved roads) would not be feasible because of water availability concerns and results in air quality impacts being significant and unavoidable. Although water availability is limited, we recommend more frequent application of dust palliatives to compensate for the reduction in watering. We also recommend that all permanent site access roads and onsite roads should be paved and that onsite vehicle speed control on the permanent onsite roads should be enforced.

55-2

Thank you for the opportunity to comment on this project. If you have any questions, please call me at (805) 645-1426.

# Letter No. 55

Alicia Stratton  
Ventura County Resource Management Agency -  
Air Pollution Control District

## Response to Comment No. 55-1

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR. Please also see Topical Response #1g, Enforcement of Mitigation Requirements, as well as the Mitigation Monitoring and Reporting Plan (MMRP) included in the Final EIR. Best management practices (BMPs) and mitigation measures implemented in Los Angeles County would also reduce and mitigate potential impacts in the Ventura County Air Pollution Control District.

## Response to Comment No. 55-2

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR. In particular, please see Table 11-1, which includes a detailed list of BMPs to be implemented for construction and operation to reduce fugitive dust. BMPs associated with fugitive dust are also included in the MMRP included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the South Coast Air Quality Management District (SCAQMD), who will oversee compliance with permit conditions and dust control plans.



October 22, 2014

Ms. Iris Chi  
Los Angeles County, Department of Regional Planning  
320 West Temple Street, Room 1348  
Los Angeles, CA 90012

From:  
Lloyd Carder II  
30530 Remington Rd  
Castaic, CA 91384  
carderfam@yahoo.com

CHIQUITA CANYON LANDFILL, DRAFT ENVIRONMENTAL IMPACT REPORT

Chiquita Canyon Landfill Master Plan Revision  
Project No. R2004-00559-(5)  
Conditional Use Permit No. 200400042  
Environmental Case No. 200400039

Dear Ms. Chi,

As a member of the community and Past president of the Castaic Area Town Council (CATC), I have the following comments and questions on the Draft EIR:

I would like to fist start by correcting the DEIR. I had sent comments on the Notice of Preparation that were shown as comments from Scott Wardle. Having been president of the council (as was Scott) and a member of the CATC, I have a unique understanding of our community and its needs. Most of the issues brought up on process transparency were not considered. My letter clearly asked for an extension of the notification area to include the region (region 1 of the CATC) due to the increased truck traffic and impacts on the residents of this region, approved projects, and the work force within the Valencia Commerce Center. The impacts both health and visual aspects were ignored by both the LA County and the DEIR preparing company for the areas east of the landfill.

56-1

**ES.4.4** – The second paragraph lists aesthetics as a control measure for the design of the final grading plan. The proposed final grade is above the adjacent ridge tops, **in violation of the Castaic CSDs**. The ridge lines at the present height are clearly visible throughout the valley and hold a natural astatic with only minor effects of the existing landfill height as called out in the 1997 agreement. *See next attached CSD Map and the following section.*

56-2

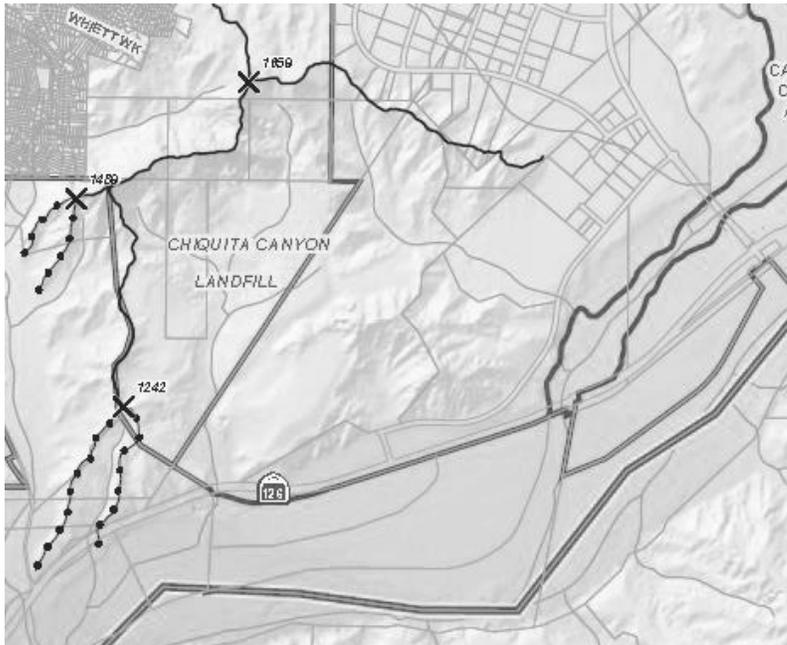
**ES.5.1** – This section does not include a smaller scale expansion as an alternative! Why is a smaller proposal not being provided, when it would have less significant environmental effects, and still provide disposal tonnage options for the county? My concern is that this an all or nothing process and that our community will have a Mega Dump in our community that will have lasting negative effects for many generations to come.

56-3

**E.S.6.12 – The statement no scenic vista is present in the vicinity of the proposed project. Is False statement. The proposed height increase is in violation of the Castaic Community Standards District (CSDs) and LA County’s One Valley One Vision hillside ordinance.**

**The Castaic CSD Ridgeline protection states:**

Two categories of significant ridgelines have been identified and are shown on this ridgeline map: Primary and Secondary.



56-4

This picture shows the primary ridges as outlined in the CSD, surrounding the landfill to the West and North. From the Northern ridge the secondary ridge is between the present landfill and the Valencia Industrial park (region 1) and SR126. The asked for increase in height would interfere with the view of the natural hillsides protected by the Castaic CSD. (A full sized copy of the complete map is attached.) Also proposed grading would directly be done on the ridgeline hills in direct violation.

**Criteria used to identify significant primary ridgelines include:**

1. Consensus by community representatives.
2. Visual dominance, including height, as characterized by a silhouetting appearance against the sky.
3. Visual dominance due to proximity and visibility from an existing community.
4. Visual dominance of the District due to their elevation in relation to the hillside or mountain terrain of which they are a part.
5. Environmental significance for the adjacent communities if they serve to connect park or trail systems.

56-5

Significant secondary ridgelines must meet the following criteria:

1. Consensus by community representatives.
2. They are smaller in size and often a feature or branch of a primary ridgeline.
3. They silhouette with another, larger primary ridgeline as a backdrop.
4. They serve as a significant, natural backdrop separating Castaic Area communities.
5. Visual dominance due to proximity and visibility from an existing, adjacent community.
6. Environmental significance for the adjacent communities if they serve to connect park or trail systems.

56-5  
cont'd

As shown in the Picture below the ridgeline running north and west are marked as primary ridgeline and the one running east is a secondary qualifier. The increase in the 1997 agreement clearly violates the Castaic CSD:

1. By not conforming to the original topography seen today in the natural form.
2. By obscuring the primary ridgeline as seen from the Valencia Commerce Center and the City of Santa Clarita.

Starting with Hasley Hills and Live Oak areas the CSD violation will be considerable during the landfill operation and after closure. Picture below shows the existing vistas.



56-6

This is a view that residents paid for and expect to see. This view has significant value to the home values and tax revenues of this community.



This is only part of the destroyed vista, as we know there will be berms along the sides of the landfill mountain to contain runoff that is not shown in this deceptive picture. Also missing will be years of landfill activity that will be visible during operation further devaluing these homes.

56-6  
cont'd

How will these residents be compensated for loss of value of their homes?

**1.1.2 – Existing CUP**

This section's language has nothing prohibiting a future landfill expansion (CUP condition 9c). There must be language clearly stating that there will be no further expansion with a final tonnage and closing date. After any one of the conditions are met and further expansion is requested some monetary penalty contract should be in place to be paid by Los Angeles County of 25 million dollars to the Castaic Community if another request is submitted. This money will not be restricted in any way so the community can fight expansion.

56-7

This is in response to the failed contract that was signed by all parties in 1997 that is now being ignored. This is also in response to the hands off stance of the county ignoring the corrupt nature of this process and any agreements.

**1.4.2 – Public Scoping:** the scoping letter attributed to Scott Wardle was written by me Lloyd Carder, and cc'd to Scott Wardle. This needs to be changed in the DIR.

56-8

Please send confirmation of this action.

### **2.2.5 Materials to be Diverted**

#### **Tire shred**

Table 2 shows Tire shred as being diverted from waste stream by being used as trench fill. Tire shred is a waste product when sent to a landfill anywhere else. This rubber product is both flammable and toxic to fish and wildlife when ingested. Rubber also migrates during compression not allowing compaction which means it is like mulch keeping the soil soft not allowing a stable slope or cover.

1. During rain events this product can be washed out since it is not in any fixed or compacted state. Why is this tire shred not considered as waste when EPA regulations state it as such?

*Alternative Use for county: Recent studies have shown when tire shred is used in paving, and pothole repairs this waste becomes a resource. The rubber compounds are fixed in the assault matrix and makes pavement last two to three times longer as standard rock/hydrocarbon pavement. This process is used in Europe extensively.*

56-9

#### **Concrete**

Table 2 shows concrete as ditch fill and road base. Concrete is a very alkaline material that will kill most plant life when near or in contact. The use of crushed concrete must be minimized to prevent unnecessary leaching of alkaline compounds into the water run off or surrounding soil where plantings will be required. Alkaline leaching can be minimized only if the crushed concrete is fixed by some type of coating process.

1. What fixing processes and or procedures will be done by the landfill to contain the alkaline leachates and off site alkaline dust particulates stirred up by outgoing haul trucks?
2. Why can't the remaining concrete be diverted as road base to be sold?

56-10

#### **Composting of green waste**

Yard wastes and kitchen scraps make up 20-30% of all household wastes, taking up space in landfills and generating methane gas that will eventually leak into the environment. Composting saves landfill space, reduces methane generation, and provides a valuable, cheap resource for improving the soil. Green waste is also food for rats, ground squirrels and other vermin that eat vegetation. The diversion plan outlined is not diversion but rather just another waste stream.

56-11

Presently the landfill is just grinding green waste and spreading it as daily cover (food for rats). For this reason **the City of Los Angeles has outlawed the use of green waste as daily cover**. There is no active composting activity being done. In the DEIR the company states due to financial reasons the project was stopped. The purpose of composting is to divert this waste from the landfill and back to the community for landscaping uses as fertilizer.

1. How will the proposed expansion if approved prevent the use of green waste as daily cover where it is a food source for rats?
2. How will the CUP if approved, prevent the shutting down of a true green waste composting diversion program?
3. How can we guarantee that compost will be reliably available to the community and landscape growers in the future at a reasonable cost?

56-11  
cont'd

#### **2.2.7.8 Sewage and Water**

##### **Onsite Sewer**

This section states they will use a septic system because no sewer system is available within a reasonable location. **This statement is false**, there is a sewer system running along Franklyn Parkway located at the entrance of the proposed entrance of the landfill. Any industrial or housing project in this area would be required to connect to the sewer connection available.

1. Contract should state that the landfill will connect to the Franklin road sewer connection. Any and all upgrades required will be paid by the landfill company prior to opening of the expanded facility.

56-12

##### **Dust prevention water**

Company states they will use an onsite water well for water to be used for dust control. There are many conflicting statements in this report concerning the use of water for dust control. First is that the pumping of water impacts the existing ground water resources so they had to cut back on the water for dust control due to the drought. Yet the water well is the sole source of water for the expected expanded area of the site requiring more pumping than 2014. With the scarcity of drinking water and the given size of District 36 water table, this well should be shut down and instead recycled water used. The landfill is located in a very small water district (district 36) and the water quantities are not presently regulated under the CLWA water use plan. District 36 depends on a single well about 1.3 miles from the landfill site. Any large scale pumping of ground water is a possible danger to the water level of the Dist. 36 well.

1. Water being used for dust control should be provided by connecting to Valencia water district's recycled water supply that runs along Franklin Parkway, not the limited resources of District 36 ground water.

56-13

2. The permit must require full compliance with SCAQMD dust control measures to protect the businesses and its workers in the adjacent commerce center.

56-13  
cont'd

2.2.9.5 Air and Landfill Gas Monitoring

**There has been a historical problem with monitoring according to witnesses in Val Verde. The monitoring is self-done and has been found to be not adequate, reliable or verifiable. It is the community's belief that this process should be done by an agreed third party along with SCAQMD and California Department of Health oversight.**

56-14

The statement that "odors will continue to be controlled" is false and should be removed. The US Postal Service employees, as well as many residents of Val Verde have all complained about odors coming from the landfill.

Short-term exposures (typically up to about two weeks) to elevated levels of ammonia and hydrogen sulfide in air can cause coughing, irritation of the eyes, nose, and throat, headache, nausea, and breathing difficulties. Studies have been conducted in communities near landfills and waste lagoons to evaluate health effects associated with exposure to landfill gases. These studies lasted for several months and reported health complaints which coincided with periods of elevated levels of hydrogen sulfide and landfill odors. The reported health complaints included eye, throat and lung irritation, nausea, headache, nasal blockage, sleeping difficulties, weight loss, chest pain, and aggravation of asthma. These complaints have been documented in the Val Verde area, but no reports of actions have been observed by the county or the landfill management. Although other chemicals may have been present in the air, many of these effects are consistent with exposure to ammonia and hydrogen sulfide.

56-15

The landfill sits in a river valley where the prevailing winds are westerly during cutoff lows and easterly during high pressure events. The air monitoring plan only calls for monitoring for the Val Verde area. With the encroachment of the landfill into the Castaic Council area of Region One, the monitoring should include the following areas and schools if expansion is approved.

1. Valencia Industrial Park (4 places along the 114 acre expansion)
2. US Postal Service Facility
3. Live Oak Elementary School
4. Santa Clarita Valley Charter School
5. Sterling Gate Way Green Valley Ranch (two Projects including TR06200)
6. Landmark Village School (not named yet)
7. Homestead Village School (not named yet)
8. Homestead Village Industrial Park
9. Val Verde community

56-16

If expansion is approved, a verifiable monitoring plan must be developed with the community and required funding by the landfill must be established. The use of a 3<sup>rd</sup> party to set the

56-17

monitoring in place and monitor the results should require a public agreement process and oversight committee. Action plans should be established prior to any approval of expansion.

1. If offsite pollution is seen in the monitored areas how can we get further monitoring and possible SCAQMD oversight?
2. How will the workers in the Valencia Commerce Center buildings along the 114 acre northern expansion be protected from Methane, Ammonia, and Hydrogen Sulfide exposure?
3. What type of monitoring with alarm system will be placed to protect residents and workers along the expansion perimeter?
4. With the possible loss of the Santa Clarita US Post Service Center and other businesses presently in the Commerce center, what monetary assurances will be put into the CUP to make up for the losses of jobs and revenues to the community?
5. What type of monetary compensation by LA County will be outlined for companies moving due to smell, health risks, vermin infestations and landfill gas emissions? If the LA County is willing to risk the workers of the industrial park then they should be willing to set monetary compensation for companies moving due to the negative effects of the landfill expansion.

56-17  
cont'd

**4.7, 4.8, and 4.9** – These sections state that “no significant adverse impacts to land use resulting from the proposed project are anticipated; therefore no mitigation measures are required”.

What are the air quality impacts to schools and nearby projects from the increase of 414 or more trash trucks a day (Table 2-3), arriving at the landfill? The DEIR must show calculations showing the emissions from the proposed increase in trash trucks, to see what concentrations of pollutants the local residents and school children will going to be exposed to, before we can say that there’s no significant impact. This analysis must be added to the DEIR.

Alternate ingress and egress routs impacts must be also included.

56-18

## **7.6 Groundwater Monitoring at CCL**

### **7.6.1 Groundwater Monitoring and Reporting Program**

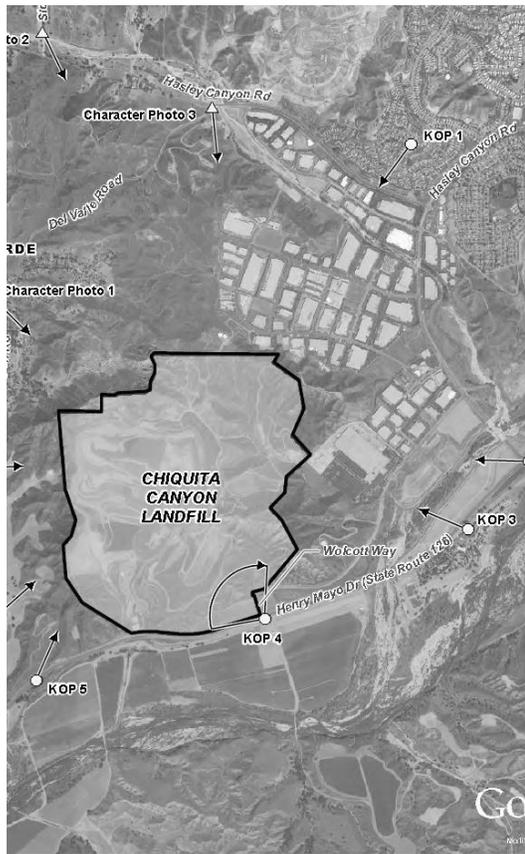
In this section there is no mention of analyzing of private or Water district 36 wells. Any and all pollution from the landfill will be the responsibility of the landfill company and the County of Los Angeles for allowing this. In the CATC regions 2-3 we use private wells and District 36 is the water service provider.

Dist. 36 has a single well located at the corner of Del Vale and Hasley Canyon roads. This well has provided 97% of 2014s water to Dist. 36. This well is located 1.3 miles from the proposed expansion. The well draws from the Saugus Aquifer that the landfill sits on top of. In years of heavy pumping there is a real and present probability that wells within a 2 mile radius can draw pollutant plumes from the dump site. We have seen such examples in the City of Santa Clarita where TCE and perchlorate has migrated 2 miles from the site of origin.

56-19

Some residents with private wells in Val Verde have complained there well water tastes funny or smells. To date there has been no agreement how testing will be paid for, so these wells could pose a possible health risk. The CUP must have annual testing for all wells within a two mile radius, if expansion is approved.

56-19  
cont'd



**FIGURE 15-1**  
Photo Viewpoint Location  
Chiquita Canyon Landfill  
Master Plan Revision

From this map the landfills expansion will move towards our District 36 water well (see Character photo 3 arrow). The landfill encroachment will be 1.3 miles from the well located at De Vale and Hasley Canyon roads.

The CUP must have guarantees that will hold the landfill owners along with the LA County to supply water to the residents of District 36 if contamination for the landfill occurs? If we have to risk our lone ground water supply for expansion then what risks are the county and landfill taking to guarantee our drinking water supply?

56-20

**15.3.1 County of Los Angeles General Plan (General Plan)**

**Highway 126 is presently on the list as being Eligible for Scenic Highway status and after conferring with Caltrans the landfill view would be cause for removal.**

From the list <http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm>

E 5 LA 7 I-210 Nr Tunnel Station/SR 126 Nr Castaic

R44.0-R55.5

**REASONS WHY DESIGNATION MAY BE DESIRABLE FOR YOUR COMMUNITY**

- Protect the scenic corridor from encroachment of incompatible land uses such as junkyards, **dumps**, concrete plants, and gravel pits.
- Mitigate activities within the corridor that detract from its scenic quality by proper siting, landscaping or screening.
- Prohibit billboards and regulate on-site business signs so that they do not detract from scenic views.
- Make development more compatible with the environment and in harmony with the surroundings.
- Regulate grading to prevent erosion and cause minimal alteration of existing contours and to preserve important vegetative features along the highway.
- Preserve views of hillsides by minimizing development on steep slopes and along ridge-lines.
- Prevent the need for noise barriers (sound walls) by requiring a minimum setback for residential development adjacent to a scenic highway.

In addition, scenic highway designation will:

- Enhance community identity and pride, encouraging citizen commitment to preserve community values.
- Enhance land values by maintaining the scenic character of the corridor.
- Provide a vehicle for the community to promote local tourism that is consistent with the community's scenic values.

Members of the Castaic Town Council, SCOPE, Friends of the River all supported this listing and eligibility. Castaic is in the process of developing a destination atmosphere transitioning from a bedroom/truck stop town to a place to vacation. The proposed expansion would damage this designation and would set back years of effort of self-sustainability we have worked for.

56-21



This Picture shows that the landfill is visible today but below the protected scenic vista starting at the Interstate 5 crossing.

56-22

**Pictures in the DEIR of how the landfill will be cover by buildings is False.**

The road way that is presently under construction is at 16-18 feet of elevation above the DEIR pictures.



This is a view shown in the DEIR of commerce Center and SR126. This roadway will be replaced by an overpass. DEIR # 15.11



56-23

This picture is from the berm of the bridge now being built that is 12 ft. lower than final grade. It already shows the existing landfill at roof level of the proposed building; however it is not the dominant feature thanks to the designated ridgeline called out in the CSDs.



a. KOP 7 – Existing view of the Proposed Project site looking northeast from Chiquita Canyon Road. This also shows the marked Primary ridgeline in the CSD map.



This picture shows the complete destruction of the Primary Ridgeline in violation of the Castaic CSDs and the One Valley One vision ordinances.

An issue also not included in the DEIR is the **One Valley One Vision General Plan June, 2011**  
I will only review 2 parts of this ordinance in this comment letter.

56-23  
cont'd

**Safety Element L4 One Valley One Vision General Plan June, 2011**

The Safety Element contains maps and policies to ensure that residents are not exposed to health risks due to air pollution, earthquakes, woodland fires, or other environmental hazards.

The proposed landfill expansion will be encroaching on areas of planned housing and existing infrastructure such as the Valencia Industrial Center. As a Castaic Area Town Council member I was on the board that approved the following projects that will be adversely impacted by the expansion. These approvals were based on the 1997 closure document that was signed by the Laidlaw the then owner of the landfill, Val Verde Civic association, Newhall Land President and CATC member Ruth Griffin. Much of the proposed expansion into the 114 acer Northern section pushes the active landfill into the existing industrial park causing a workplace safety issue. It also infringes on the Sterling Gateway projects approved by the council and in process with LA County. If the expansion is approved it is my position that the landfill would be monetarily responsible for the losses of value of these projects. Other projects approved would be Mission Village, Landmark Village all with schools and housing that would be impacted by both the landfill operations and the poorly reported Diesel fumes from the haulers.

56-24



56-25

This picture shows the visual aspects from Santa Clarita where the existing landfill is visible below the Castaic CSD Primary hillsides. The proposed new height would more than cover the natural hillside aspects that are in accordance with the One Valley One Vision plan.

**One Valley One Vision General Plan June, 2011**

**Hillside Preservation L-34**

3. Preservation of Significant Ridgelines, Hillsides, and Scenic Resources. The Santa Clarita Valley is characterized by numerous canyons, hills, and mountains. The planning area consists of a mountainous complex of sedimentary rock formations dissected by long, narrow tributary valleys of the Santa Clara River. The Valley floor, which ranges in elevation from 1,000 to 3,000 feet above sea level, is surrounded by mountain ranges, including the San Gabriel, Santa Susana, and Sierra Pelona ranges. About half of the planning area consists of land on slopes of 10 percent or less, with the remaining area containing steeper slopes.

Both the City and the County have recognized the hillside areas of the Valley to be important resources and have adopted hillside management regulations to restrict development on steeper slopes, but the current hillside ordinances of the two agencies differ as to both process and intent. The County's ordinance applies to average slopes of 25 percent and greater, while the City regulates development on areas with an average cross slope of greater than 10 percent. The ordinances also vary in terms of development requirements for hillside areas. While both the City and the County regulate density of development based upon slope

56-26

steepness, the City's ordinance also regulates building placement to preserve designated ridgelines. Currently, the County has not delineated significant ridgelines throughout the planning area, but has done so within the Castaic Community Special Standards District. Although County policies do not prohibit building placement on ridgelines, the County's ordinance is intended to protect hillsides from environmental degradation, preserve public safety and property, and maintain the natural topography to the extent possible. The County has prepared Hillside Design Guidelines (1989) to assist developers in preparing plans for hillside areas, but these are advisory only. The County's hillside ordinance requires no discretionary review for new development below density thresholds. The City's ordinance requires preservation of natural topographic features, designated ridgelines, maintenance of off-site and on-site views, and landform grading.

56-26  
cont'd

Land Use

Sensitive treatment of the Valley's prominent hillsides and ridgelines is considered to be important for several reasons. These features contribute to the character of the Valley of Villages by forming a distinctive backdrop between neighborhood communities. They provide a scenic open space greenbelt around the perimeter of the Valley and provide residents with a connection to the natural mountain environment. In addition, as the supply of land in level portions of the Valley diminishes, the development pressure for building in hillside areas is likely to increase. Therefore, it was considered to be important in the One Valley One Vision planning effort to reach agreement between the City and the County on a coordinated approach to ridgeline preservation and hillside protection, and policies have been added to the Land Use Element to address these issues.

56-27

The unnatural and unsightly landform will destroy the view of the neighboring Santa Susana and San Gabriel Mountains in both Castaic and the city Santa Clarita. The new proposed height would be visible throughout the valley including Stevenson Ranch Interstate 5 and City of Santa Clarita. This is a violation of the One Valley One Vision Ordinance. What mitigations will be made to the extended SC Valley?

15.3.3 -None of the ridgelines designated as significant by the CACSD will be affected by the Proposed Project is a False statement. See the attached LA County map of the Castaic CSDs.



56-28

15.6.1 – Mock-up photos of the landfill do not include the “20 foot wide benches required in the final landfill cap as stated in DEIR section 2.2.8.3. It is deceptive to depict the mock-up photos of the smooth natural looking landform in the DEIR picture above. Also the natural habitat that is in the area does not have the required by law, root systems to hold soil in place.

**15.6.4.1 – There are informally designated scenic vistas within the Proposed Project area, and the landfill will have a significant impact on these scenic vistas is a false statement repeated in multiple places.**

1. The proposed height increase will violate both the Castaic CSD and the Santa Clarita One Valley One Vision Plan.

18.3.2 – By not considering a no project alternative or a smaller capacity alternative project proposal, is all or nothing. The impacts of this magnitude poses a health risk to Val Verde, the Valencia Commerce Center, Landmark Village, Homestead Village, Mission Village and Sothern Castaic communities is in danger. These risks further carryover to the loss of value to projects close to the landfill. There will be a loss of tax dollars and revenues to the community and county not discussed in the DEIR.

56-29

1. What will be the Tax losses in a 2 mile radius of the proposed expansion? Report must include loss of value of land, existing housing, industrial buildings, and loss of jobs due to companies moving.
2. The DIR did not address the revenue loss due to having a landfill close to the proposed and existing projects what are those losses.

3. What will be the street impacts concerning wear and tear by the haulers? Who will pay those added expenses?

56-29  
cont'd

**In Appendices G “Traffic Study” there are significant omissions and possible errors:**

**The traffic study falsely used present daily receipts to establish baselines.** The landfill is presently accepting only ½ of the present CUP max utilization. The permitted daily is 6000 tons but they have been operating at 3000 tons/day since 2001. The Study needs to redo their math to show a 300% increase of present receipts.

1. The traffic study does not account for the haul trucks for daily cover.
2. What will be the impacts of alternate traffic flow during snow closures of the I5?
3. What will be the impacts of alternate traffic in case of the SR126 off-ramp closure?
4. What will be the alternate traffic flow during an accident along SR126 to the entry of the landfill?
5. How will truck traffic be prevented from coming on to the Hasley Canyon traffic circle?
6. How will truck traffic be prevented from coming on to Commerce Center/Hasley Canyon?
7. In some cases on projects pollution studies were included in this section (example Newhall Ranch), please present those study numbers.
8. The impacts on the city of Santa Clarita were not included when the Interstate 5 Closure at Newhall pass occurs.
  - a. Will the trucks be diverted though Santa Clarita city?
  - b. What will be the alternative routes?
9. The effects on traffic in Newhall pass with 400+ more trucks each day.
10. Landfill payments to Caltrans to pay for the wear and tear of the Interstate 5.
11. Landfill payments for added lanes on Interstate 5 (see Newhall Ranch requirements)

56-30

**## Added Comments** about Public meets done so far. All of these examples expose the county and participant organizations to legal actions.

1. It is also my opinion that very poor effort was made concerning communicating and supplying Spanish documentation of the DIR and supporting documents. The Public meeting held at the sports complex was poor and embarrassing to those who only spoke Spanish. The county was ill-prepared for Spanish speakers at the meeting and struggled to get through the one that spoke.
2. Another other item at the meeting was there was no way to submit written comments at the meeting as required by law. Persons not wanting to speak and submit comments were give a website and told to comment on the DEIR.

56-31

CASTAIC LAKE

2002

1839

CASTAIC LAGOON

1808

1610

CHARLIE CANYON

1355

1368

1376

1782

1796

TAPIA CANYON

1686

CASTAIC CREEK AREA

NORHLAKE  
SPECIFIC PLAN

TRUCKING DISTRICT

ROYAL RD.

1949

1906

2007

2090

1978

2139

CANYON

1755

1843

1773

1968

1990

1933

1867

1900

SLOAN CANYON

COMERO CANYON

# Letter No. 56

Lloyd Carder  
30530 Remington Rd.  
Castaic, CA 91384

## Response to Comment No. 56-1

The referenced scoping letter (pages 101 through 107 of Appendix A) includes no indication of the sender's name and was incorrectly attributed to Scott Wardle. Chapter 1 of the Introduction has been changed to attribute this letter to Lloyd Carder.

## Response to Comment No. 56-2

Please see Topical Response #27 for a discussion of Visual Resources, including ridgeline protection via the Castaic Area Community Standards District.

## Response to Comment No. 56-3

Section ES.5.1 of the Original Draft EIR provided only a summary of alternatives evaluated. Original Draft EIR Section 18.3.2, Alternative Landfill Project Design, provided a more detailed discussion of why a smaller-scale expansion alternative was not evaluated in detail in the Original Draft EIR. Nevertheless, two smaller-scale expansion alternatives were evaluated in the Partially Recirculated Draft EIR; see Chapter 18, Project Alternatives, of the Final EIR.

Also see Topical Response #18 for a discussion of Project Alternatives.

## Response to Comment No. 56-4

Please see Topical Response #27 for a discussion of Visual Resources, including ridgeline protection via the Castaic Area Community Standards District.

## Response to Comment No. 56-5

Please see Topical Response #27 for a discussion of Visual Resources.

## Response to Comment No. 56-6

Please see Topical Response #27 for a discussion of Visual Resources, including a discussion of the Project's compliance with the Castaic Area Community Standards District.

Please see Topical Response #20 for a discussion of Property Values.

## Response to Comment No. 56-7

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

## Response to Comment No. 56-8

The referenced scoping letter (pages 101 through 107 of Appendix A) includes no indication of the sender's name and was incorrectly attributed to Scott Wardle. Chapter 1 of the Introduction has been changed to attribute this letter to Lloyd Carder.

## Response to Comment No. 56-9

Please see Topical Response #26 for a discussion of Treated Auto Shredder Waste and Shredded Tires.

## Response to Comment No. 56-10

Table 2 (Table 2-1 of the Final EIR) correctly indicates that concrete may be diverted from the waste stream and put to beneficial reuse at CCL. Broken concrete or concrete rubble is recognized to be beneficially used by regulatory agencies and is used as such at CCL.

## Response to Comment No. 56-11

Please see Topical Response #3, Composting Facility and Conversion Technology, as well as Topical Response #19, Project Need.

Regarding question #2, it is not clear what the commenter means by this question. Approval of a new Conditional Use Permit (CUP) for CCL would not result in the "shutting down of a true green waste composting diversion program." The opposite is true, if mixed organic composting is an allowed activity under the new CUP, CCL would be permitted to commence an expanded composting operation.

## Response to Comment No. 56-12

The Los Angeles County Department of Public Health - Environmental Health Division reviewed the Original Draft EIR for the Proposed Project and determined that the use of a septic tank for sanitary facilities at the landfill office is appropriate and allowable.

## Response to Comment No. 56-13

CCL does not have an onsite water well, and the Original Draft EIR does not state that an onsite water well will be used for dust control. Rather, "water for routine landfill operation, including dust control and irrigation, will continue to be supplied from an offsite irrigation well south of the landfill on Newhall Ranch" (Original Draft EIR, Section 2.2.7.8, Sewage and Water), supplemented by water from the Valencia Water Company during times of periodic cell construction.

Regarding recycled water, Original Draft EIR Section 14.5.2.5, Water Supply states: "when recycled water is available in the vicinity of landfill, it will be used for the non-potable water demand at CCL, thus reducing the demand for potable water supplies. Recycled water supplies are expected to be available in the project vicinity at the time of the completion of the Newhall Ranch Project's recycled water infrastructure."

BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the Mitigation Monitoring and Reporting Plan (MMRP) included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the South Coast Air Quality Management District (SCAQMD), who will oversee compliance with permit conditions and dust control plans.

## Response to Comment No. 56-14

Please see Topical Response #10, Environmental Monitoring, for a discussion of air and landfill gas monitoring.

## Response to Comment No. 56-15

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, which includes an updated health risk assessment for the Proposed Project. Please also see Topical Response #17, Odor, and Topical Response #21, Public Health.

## Response to Comment No. 56-16

Please see Topical Response #10, Environmental Monitoring, for a discussion of air quality monitoring.

## Response to Comment No. 56-17

Please see Topical Response #10, Environmental Monitoring, for a discussion of air quality and landfill gas monitoring.

## Response to Comment No. 56-18

Please see Topical Response #15 for a discussion of Land Use.

Potential impacts and associated mitigation measures associated with other resource areas are addressed in Chapters 5 through 15 of the Original Draft EIR and in Chapters 8, 11, and 12 of the Partially Recirculated Draft EIR. Specifically, air quality impacts are addressed in Chapter 11.

It is not clear what the commenter means by “alternate ingress and egress routes impacts.” The Original Draft EIR and Partially Recirculated Draft EIR describes relocating the CCL entrance to just north of the intersection of State Route 126 and Wolcott Way. No alternate ingress and egress routes are proposed for the Proposed Project.

## Response to Comment No. 56-19

Please see Topical Response #10, Environmental Monitoring, for a discussion of surface and groundwater quality monitoring.

## Response to Comment No. 56-20

Please see Topical Response #10, Environmental Monitoring, for a discussion of surface and groundwater quality monitoring.

## Response to Comment No. 56-21

Please see Topical Response #27 for a discussion of Visual Resources.

## Response to Comment No. 56-22

Please see Topical Response #27 for a discussion of Visual Resources.

## Response to Comment No. 56-23

Please see Topical Response #27 for a discussion of Visual Resources.

## Response to Comment No. 56-24

The cumulative projects list included in Chapter 3 of the Original Draft EIR includes projects in the vicinity of CCL reasonably thought to be developed during the lifespan of the Proposed Project. Potential impacts of the Proposed Project, in conjunction with these cumulative projects, are discussed in each of the resource chapters of the Original Draft EIR, Chapters 4 through 16.

As the Proposed Project does not change the property line of CCL, it is not possible for the proposed expansion to push the active landfill into the existing adjacent industrial park, although it is true that the waste footprint will move northeast within the property boundary.

### Response to Comment No. 56-25

The *One Valley One Vision General Plan*, June 2011, describes City of Santa Clarita and County of Los Angeles standards to preserve hillside areas and significant ridgelines. As described elsewhere, the Proposed Project conforms to the Castaic Area Community Standards District regarding ridgeline protection.

Please see Topical Response #27 for a discussion of Visual Resources, including ridgeline protection via the Castaic Area Community Standards District.

### Response to Comment No. 56-26

Please see Topical Response #27 for a discussion of Visual Resources, including ridgeline protection via the Castaic Area Community Standards District development restrictions.

### Response to Comment No. 56-27

Please see Topical Response #27 for a discussion of Visual Resources, including ridgeline protection via the Castaic Area Community Standards District development restrictions.

### Response to Comment No. 56-28

Please see Topical Response #27 for a discussion of Visual Resources.

### Response to Comment No. 56-29

(1) / (2) An Environmental Impact Report (EIR) is required to document the potential environmental impacts of a project being considered. The EIR is not required to do an economic analysis of tax benefits or losses as a result of a proposed project. However, it should be noted that CCL has been in operation in their current location for over 40 years, and housing and business development has been built around CCL. Therefore, there is no basis on which to determine that there would be any loss in value of land or housing, or companies moving away, as a result of continued operation of CCL. Please also see Topical Response #20, Property Values.

(3) Potential street impacts locally and on Interstate 5 are determined by the Los Angeles County Department of Public Works - Street and Lighting Division and Caltrans, respectively.

### Response to Comment No. 56-30

Please see Topical Response #25 for a discussion of Traffic.

### Response to Comment No. 56-31

The County is in compliance with the State's notification process. Please see Topical Response #22, Public Scoping and Public Outreach.

The commenter is incorrect about the ability for attendees of the hearing examiner meeting to submit written comments. Attendees were provided with a comment card that could be filled out and provided to Lead Agency staff at the meeting or mailed to Lead Agency staff at a future date.

#57

Ms. Nancy Carder  
30530 Remington Rd.  
Castaic, CA 91384  
carderfam@sbcglobal.net

October 22, 2014

Ms. Iris Chi  
Los Angeles County, Department of Regional Planning  
320 West Temple Street, Room 1348  
Los Angeles, CA 90012

**CHIQUITA CANYON LANDFILL, DRAFT ENVIRONMENTAL IMPACT REPORT**

Chiquita Canyon Landfill Master Plan Revision  
Project No. R2004-00559-(5)  
Conditional Use Permit No. 200400042  
Environmental Case No. 200400039

Dear Ms. Chi,

I am a member of the community, and have the following comments on the Draft EIR:

**Executive Summary**

**ES.3.3** – Doubling the daily and weekly tonnage, and increase the landfill life by 21 – 38 years, thus increasing the size in this magnitude, is an extraordinarily large expansion proposal for a landfill that is located next to a residential area.

57-1

**ES.4.1** – Most of the wastes listed as diverted are actually used as daily cover on the landfill, so this statement is misleading and should be clarified. An example is that most people would think that green waste would be diverted and turned into compost for public consumption, but at the project site it is used as daily cover. Daily cover is added into the landfill mass daily, but not counted in the daily tonnage.

57-2

**ES.4.3, second paragraph** – The document lists the additional employees and equipment that will be used for the expansion, but does not include the increase in dump trucks that will be coming and going from the landfill due to the proposed increase in capacity.

57-3

**ES.4.3, third paragraph** – The DEIR states that hazardous waste is prohibited from being disposed of at the landfill. However, according to two separate “Reports of Investigation” regarding SA Recycling/Chiquita Canyon Landfill by the Department of Toxic Substances Control (DTSC) both dated November 24, 2008, the landfill accepted treated auto shredder residue (ASR) that contained hazardous waste levels of zinc. On both March 27, and April 9, 2008, two separate truckloads in March showed average concentrations of soluble zinc at 512.5 mg/L and 560 mg/L; and one truckload in April showed an average concentration of soluble zinc at 277.25 mg/L. The hazardous waste threshold for soluble zinc is 250 mg/L. These levels sampled would not even be allowed to be disposed of at a hazardous waste landfill with-out prior treatment. This activity directly correlated with high levels of zinc in the storm water from CCL exceeding National Pollutant Discharge Elimination System (NPDES) Permit benchmark levels, as reported in the CCL 2008-09 Annual Storm Water Report to the Regional Water Quality Control Board (RWQCB) (see comment to section ES.6.2). What will be done to prevent this from happening again? There must be a requirement in place to have the ASR sampled and analyzed on a periodic basis to make sure it is legally allowed to use in or on the landfill.

57-4

**ES.4.4** – The second paragraph lists “aesthetics” as a control measure for the design of the final grading plan; however, the proposed final grade is above the adjacent ridge tops, which is not aesthetically pleasing. Neither is the requirement in section 2.2.8.3 that 20 foot wide benches will be constructed at 50 foot elevation change intervals, and that this will also show above the adjacent ridge tops.

57-5

**ES.4.5** – Please explain how the proposed continued operation of both a landfill gas-to-energy (LFGTE) Plant and Household Hazardous Waste Facility (HHWF) operating after landfill closure is compatible with a publicly accessible recreational use or park that is proposed in this document.

57-6

**ES.5.1** – Why does this section not include a smaller scale expansion as an alternative, when it would have less significant environmental effects, and still provide disposal tonnage options for the county?

57-7

**ES.5.2.1** – I disagree that the impacts to our air quality would be the same. It will not be the same air quality for our neighborhoods near the landfill when the daily tonnage has doubled, and the number of trash trucks arriving and departing from the landfill has doubled. Explain how this will not have a detrimental effect on the air quality in Val Verde and at both the Santa Clarita Charter School and the Live Oak School.

57-8

**ES.5.2.4, Comparison of Alternatives** – The DEIR states that “the No Project Alternative in effect defeats the important objectives of the Proposed Project, the development of substantial additional disposal capacity to serve the region’s and Los Angeles County’s needs.” However, Page 1-381 of the Los Angeles County Siting

57-9

<p>Element Volume II, Appendices 1- A thru 1- D, by the LADPW Environmental Program Division, June 1997, states that "Overall, the report concludes that through the adoption of the above policies and changes in the projection methodology, the disposal capacity shortfall can be extended until the year 2023 (i.e., no shortage in daily permitted capacity of in-County disposal facilities) and that there is no need for new or expanded landfill and transformation (waste-to-energy) capacity during the CSE's 15-year planning period." According to this excerpt, there is no landfill capacity shortfall in the county at this time, so a No Project Alternative can and should be evaluated.</p>	<p>57-9 cont'd</p>
<p><b>ES.6.1</b> – The proposed project directly conflicts with the proposed Landmark Village Development that is proposed to be directly adjacent to the landfill expansion. How is the proposed landfill expansion not a landslide risk to Val Verde and the proposed new development? In the 2004-2005 rainy season, there was major landslide complex reactivated on the landfill (DEIR Chapter 5, page 35), as well as numerous debris flows in Val Verde that resulted in a lot of property damage. Section 5.7.2.4 of the DEIR states further that: "there's a potential for debris flow on the north side of the future entrance road". The proposed larger landfill is not compatible with the housing developments and schools proposed for the area.</p>	<p>57-10</p>
<p><b>ES.6.2, fourth paragraph</b> – The document states there is potential for soil loss of up to two tons per acre of soil per year. What will be done to prevent the ASR used as daily cover (with elevated heavy metal content), from eroding, along with the soil, into the Santa Clara River? The CCL 2008-09 Annual Report to the RWQCB showed high levels of zinc, exceeding the U.S. EPA benchmark level. In 2008, that same season, ASR with hazardous waste levels of zinc was used as daily cover (see comments to ES.4.3)</p>	<p>57-11</p>
<p><b>ES.6.2, eighth paragraph</b> – The DEIR states that the run-off from the landfill will help to recharge the Santa Clara River. How will CCL prevent contaminants in the run-off from being carried into the River?</p>	<p>57-12</p>
<p><b>ES.6.4, Water Quality</b> – This section states that CCL will have minimal effect on water quality because they will be in compliance; however, they have not been in compliance. Data from the RWQCB SMARTS database shows that in 2008-09, storm water from CCL exceeded benchmark values established in their NPDES General Permit for total suspended solids (TSS), specific conductance (SC), chemical oxygen demand (COD), biological oxygen demand (BOD), total dissolved solids (TDS), iron, and zinc. For samples taken for their 2010-2011 Annual Report, CCL exceeded benchmark values for SC, TDS, and iron. For 2011-2012 there was only one storm water sample taken, because no other storms produced enough discharge from the site during operating hours. Sample results showed TSS, SC, BOD, and COD exceeding benchmark values. For 2012-2013 there were no storm water samples taken, because there were no significant rainfall events observed, due to drought conditions. The results for the three years prior; however, show that CCL has not been in compliance with the NPDES Permit requirements, and they already have had a detrimental effect on storm water</p>	<p>57-13</p>

quality. Expanding the landfill will have a much more detrimental effect on water quality than is stated.

57-13  
cont'd

**ES.6.5, Potential Impacts to Downstream Water Quality** – This section states “water quality monitoring and response programs at CCL would ensure that the Proposed Project would not result in significant impacts to downstream water quality”; however there is no guarantee that monitoring and response programs will result in compliance with the NPDES Permit requirements, and they have been out of compliance as noted in comment ES.6.4 above. There is a direct link between loss of surface water quality and the habitat loss of the stickleback and other special status fish species. There is also a direct link between loss of surface water quality and the loss of groundwater quality in the groundwater wells in the Santa Clara River bed downstream. Ventura County farmers and residences depend on that water.

57-14

**ES.6.5, Potential Impacts to Federal and State Listed Bird Species** - Condors are known foragers at landfills as they are scavengers. How is the potential exposure from the heavy metals in the ASR used as daily cover acceptable?

57-15

**ES.6.6, Potential Impact to Bowers Cave (CA-LAN-36)** – Replace the word “should” with the word “shall” in the following sentence from this section “grading plans should clearly depict the sensitive area of CA-LAN-36”.

57-16

**ES 6.8, Air Quality, Potential Cumulative Impacts** – For operational emissions, the document states “maximum emissions periods may temporarily exceed the mass daily emission thresholds, the overall impact from operational activities would be less than significant based on modeled ambient impacts from criteria pollutant emissions”. The scale of the proposed project should be reduced, so that daily emission thresholds are not exceeded. Interpreting modeling results is subjective and is being used to explain away the significant impact of the air quality exceedances.

This section also states that pollutants will exceed their respective thresholds, in the construction models for 2021 and 2031, but there will be no impact until construction of the proposed Newhall Ranch development. Not only is Newhall Ranch expected to be developed, but air impacts occur when pollutants exceed their respective thresholds. With no mitigation available, I don't know how the county can approve this proposal especially in a non-attainment area. An alternate proposal or no project alternative must be studied.

57-17

**ES.6.12** – The DEIR states that “no scenic vista is present in the vicinity of the proposed project”. This is statement is false. The unusual and unsightly landform of the Proposed Project will destroy the view of the neighboring Santa Susana Mountains and the Santa Clara River.

57-18

**ES.6.13, Environmental Justice** – The proposed project will disproportionately affect a minority and low income population. If this proposed expansion is approved, the county is supporting the fact that a white middle class population in unaffected areas of northern Castaic are getting paid money by the landfill, for their service club, to influence the Castaic Town Council and Los Angeles County into approving an expansion project that will negatively affect a predominantly Hispanic population that lives adjacent to the landfill. The county also did not provide information about the landfill expansion in Spanish, although the population in Val Verde is over 50% Hispanic. The Hispanic population in the areas close to the landfill will suffer financial and quality of life losses, as well as loss of health issues. The proposed expansion is definitely an Environmental Justice issue.

57-19

### Chapters

**1.1.2** – The existing CUP includes language that nothing prohibits proposing a future landfill expansion (CUP condition 9c); however, CCL already entered into a contract, apparently in bad faith, with the Val Verde Civic Association that the previous landfill expansion would be the last expansion. The fact that CCL is not honoring that contract now speaks for their dishonesty and their ability to manipulate the community and the county.

57-20

**1.4.2 – Public Scoping** - The scoping letter attributed to Scott Wardle was written by Lloyd Carder, and cc'd to Scott Wardle. This needs to be changed.

57-21

**2.2.2** – If the purpose of the expansion was to be able to use up more of the land on the projects site by filling in two other areas, then why has the proposed maximum elevation increased 133 feet from the maximum elevation in the existing CUP?

57-22

**2.2.3, Disposal Rate and Volume** - Waste “diverted” or beneficially re-used is not included in the daily tonnage. The term “diverted” is misleading as these materials are used for daily cover and for the hauls roads and end up in the landfill anyway, they are not recycled or diverted away from being disposed. Another word should be used to describe these wastes.

57-23

**2.2.4** – What procedures will be followed to ensure that the treated ASR that is accepted will not contain hazardous waste levels of metals, as it did in 2008 when the landfill accepted treated ASR that contained hazardous waste levels of zinc? As stated in comment ES.4.3, third paragraph, sampling of two separate truckloads of ASR on March 27th showed average concentrations of soluble zinc at 512.5 mg/L and 560 mg/L; and sampling of one truckload on April 9th showed an average concentration of

57-24

soluble zinc at 277.25 mg/L. The hazardous waste threshold for soluble zinc is 250 mg/L.	57-24 cont'd
<b>2.2.7.2</b> – Include sample analysis screening criteria for the treated auto shredder waste (TASW) (ASR), to confirm it does not contain hazardous waste levels of metals.	57-25
<b>2.2.7.3</b> – Include measures to prevent injury and/or death to birds that may fly into the landfill gas flares.	57-26
<b>2.2.8.3</b> – The following statement “To create a slope designed to minimize erosion and future maintenance, 20-foot-wide benches will be constructed at approximately 50-foot-elevation change intervals” conflicts with the mock-up “b” versions of photos KOP 1 thru KOP 7 in Chapter 15, Visual Resources, that show a smooth rounded appearance of the closure cap of the proposed expansion. The mock-up photos are wrong and misleading as they do not show the 20 foot wide benches at 50 foot intervals on proposed final landfill cap.	57-27
<b>2.2.9.1, Sampling, Analysis and Reporting Requirements</b> – Constituents of concern (COC) are only analyzed every five years at CCL. Groundwater monitoring for COCs should be on a more frequent basis if the proposed expansion is approved, due to the large increase in daily tonnage and the proximity of the landfill to the Santa Clara Riverbed and drinking water wells in the vicinity. The COCs are not identified, and should be included in the EIR.	57-28
<b>2.2.9.3, Leachate Monitoring</b> – This section states that leachate can be treated on-site, but the DEIR does not include any information on how it will be treated, or any information regarding a leachate treatment plant on the site. This part of the project description is incomplete.	57-29
<b>2.2.9.4</b> – Explain why barium, chromium VI compounds, cobalt, fluoride salts, molybdenum, vanadium are not included in the storm water metal analyses. These compounds need to be included because of the use of ASR and contaminated soils for daily cover, and the possibility that priority pollutants would be migrating off-site in the storm water.	57-30
<b>2.2.9.6</b> – Why does this section not include the two fold increase in diesel emissions coming from the increase in disposal truck travelling to and from the landfill?  The statement that “odors will continue to be controlled” is false and needs more of an explanation. The US Postal Service employees, as well as many residents of Val Verde have all complained about odors coming from the landfill, and the odors reoccur.	57-31
<b>2.3.4</b> – The fourth paragraph discusses the proposed final cover landscaping that is said to blend with existing vegetation. I never saw a closed landfill that blended in with	57-32

<p>the surrounding vegetation. The mock-up pictures do not show the 20 foot wide benches at 50 foot intervals that are required as stated in DEIR section 2.2.8.3. The proposed “natural landform” is not necessarily achievable unless there is alternative to the proposed construction of the landfill cap.</p>	<p>57-32 cont'd</p>
<p><b>4.3.1.2</b> - If the county’s land use objectives and policies relevant to the Proposed Project include both: the protection of major landfill and solid waste disposal sites from encroachment of incompatible uses; and providing a land use decision-making process supported by adequate information and ongoing citizen participation. Then why is the county entertaining a proposed expansion of the landfill when the Newhall Ranch project development has already been approved? Isn’t that encroachment? Furthermore, why didn’t the county require any citizen outreach with the exception of the Val Verde Civic Association and the Castaic Town Council, both of which were approached with a buy off of money that invited corruption into the community?</p>	<p>57-33</p>
<p><b>4.6.3</b> – The proposed project must comply with the Castaic Area Community Standards District (CACSD) guidelines.</p>	<p>57-34</p>
<p><b>4.7, 4.8, and 4.9</b> – This section states “no significant adverse impacts to land use resulting from the proposed project are anticipated; therefore no mitigation measures are required”. Residential housing development projects nearby the landfill were approved by the Castaic Town Council with the knowledge that the landfill was going to close in accordance with the current Conditional Use Permit (CUP). These projects include schools, and they are not compatible with the operation of the proposed expanded mega-landfill receiving approximately 414 more waste disposal trucks a day.</p>	<p>57-35</p>
<p><b>5.7.2.3</b> – This section states that erosion is estimated at less than two tons per acre per year, and that erosion will be controlled in part by the NPDES General Permit; however, CCL has not been in compliance with their NPDES General Permit. How are they going to keep the ASR and contaminated soils from entering the riverbed, as has happened in the past (see comments to ES.6.4 and 6.3.2.2)? There must be mitigating measures that actually work, or CCL should be prevented from using contaminated material as daily cover.</p>	<p>57-36</p>
<p><b>5.7.2.6</b> – DEIR states “there is a potential that groundwater extraction may be required for a corrective action program if a release from the Unit occurs to the environment.” However, this is not included as a mitigating measure under 7.8, and it should be since releases have already occurred from the unlined Primary Canyon.</p>	<p>57-37</p>
<p><b>6.3.2.2</b> - Data from the RWQCB SMARTS database shows that in 2008-09, storm water from CCL exceeded benchmark values established in their NPDES General Permit for total suspended solids (TSS), specific conductance (SC), chemical oxygen demand (COD), biological oxygen demand (BOD), total dissolved solids (TDS), iron, and zinc. This is the year that they accepted ASR containing hazardous waste levels of zinc (see comment to section ES.4.3, third paragraph). For samples taken for their 2010-2011 Annual Report, CCL exceeded benchmark values for SC, TDS, and iron. For 2011-</p>	<p>57-38</p>

<p>2012 there was only one storm water sample taken, because no other storms produced enough discharge from the site during operating hours. Sample results showed TSS, SC, BOD, and COD exceeding benchmark values. For 2012-2013 there were no storm water samples taken, because there were no significant rainfall events observed, due to drought conditions. The results for the three years prior; however, show that CCL has not been in compliance with the NPDES Permit requirements, and they already have had a detrimental effect on storm water quality.</p>	<p>57-38 cont'd</p>
<p><b>6.8</b> - The proposed design must also evaluate potential mudflow that can occur into adjacent and off-site areas where homes and businesses reside.</p>	<p>57-39</p>
<p><b>7.6.1</b> – Groundwater monitoring for COCs (including metals) should occur at a higher frequency than every five years, due to the daily disposal of ASR and contaminated soils onto the cover. The collection of an annual leachate sample to check for contaminants of concern is completely inadequate, considering that it is proposed to be used for dust control. A sample frequency of quarterly should be considered to give greater assurance that the leachate complies with the WDRs. A reference should be made in the section to the list of COCs. Are they listed in 7.6.1.3?</p>	<p>57-40</p>
<p><b>7.6.1.3</b> – A total metal analysis should be added to the groundwater sampling and analysis, due to the fact that this landfill took in industrial wastes at one time, and is currently using ASR and contaminated soils as a daily cover.</p>	<p>57-41</p>
<p><b>7.6.1.4.1</b> – The report states that VOCs detected in wells DW-1, DW-3, DW-16, and DW-20 are attributed to landfill gas migration alone; however, this can also be due to historical disposal of industrial wastes that occurred at CCL.</p>	<p>57-42</p>
<p><b>7.7.1.1</b> – The proposed project will incorporate a liner system; however, liner systems have been known to leak.</p> <p>The statement “impacts are expected to be less than significant” is not true. CCL has already been in violation of its NPDES Permit requirements for storm water discharges for three of the last four years. The only reason they were in compliance last rainy season is because there was no sampling done due to no measurable rainfall.</p>	<p>57-43</p>
<p><b>7.8</b> – Listing no Mitigations Measures here is wrong. Groundwater extraction should be listed as a contingency, as it will eventually be required with the proposed expansion in order to prevent the migration of contaminants to nearby drinking water wells.</p>	<p>57-44</p>
<p><b>8.6.3.9</b> – The California condor, due to drought or seasonal changes may forage at the proposed project. What mitigation measures will be in place to ensure that the birds will not be exposed to the metals from the daily cover of ASR?</p>	<p>57-45</p>
<p><b>8.6.3.10, BR-18</b> – Unused nest sites cannot be destroyed in the disturbance area during pre-construction surveys with-out the consent of the California Department of Fish and Wildlife (CDFW). CDFW is to determine if a nest site is unused.</p>	<p>57-46</p>

<p><b>8.6.3.14</b> - The DEIR states that the Proposed Project may cause direct impacts to roost sites from destruction or filling of roost sites for various bat species that use small crevices and caves on the project site. The document also states that abundant sandstone outcrops occur in the mountains and ridges of this region, so that the loss (destruction) or abandonment of roost locations is not anticipated to represent a significant impact. What scientific study is this based on?</p>	57-47
<p><b>8.6.3.17, BR-21</b> – Oaks trees removed must be replaced on at least a four to one basis.</p>	57-48
<p><b>9.5.1.1</b> – If the U.S. Forestry Reserve boundary monument date 1905 was apparently destroyed by previous landfill grading, how do we know that the CCL won't destroy Bower's Cave?</p>	57-49
<p><b>9.5.1.2</b> – The SCVHS's recommendations that the cave be inspected by a state certified archaeologist, and should receive state historic preservation status prior to the proposed expansion activities, should be followed.</p>	57-50
<p><b>9.5.2.3</b> – “Portions of the ceiling in the cave have continued to collapse” – landfill operations are most certainly a factor in the degradation of the cave. There is a constant vibration from the operation of the landfill equipment causing the ground to shake. How can this be mitigated to save this historical resource?</p>	57-51
<p><b>9.6.1.2</b> – Bower's Cave must certainly be listed in the CRHR to give it protection that will help preserve the integrity of this important archaeological resource. Why is this not a mitigating measure?</p>	57-52
<p><b>9.6.2.1</b> – Paragraph two is false in stating “grading will not impact the cave”. The vibration and ground movement associated with grading will certainly cause more damage to the ceiling of the cave.</p>	57-53
<p><b>11.2</b> – How is the fugitive dust going to be suppressed if the current water restrictions continue? Residential properties are too close to the landfill, and fugitive dust can expose people to elevated levels of lead, heavy metals, and PCBs and other toxins from the ASR and contaminated soils.</p>	57-54
<p><b>11.3.3.1</b> – The project location is already in an area of nonattainment for state ozone, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>2</sub>, and lead standards; and is nonattainment for the federal 8-hour ozone, PM<sub>2.5</sub>, and lead standards, so how can Los Angeles County approve the proposed project that doubles the daily tonnage that can be accepted at the landfill? Doubling the tonnage would mean doubling the amount of trash trucks coming and going from the landfill, this most certainly will increase the contaminant levels.</p>	57-55
<p><b>11.3.3.2</b> - Is monitoring data for SO<sub>2</sub> and PM<sub>2.5</sub> from the Burbank and Reseda monitoring stations representative of the levels of those compounds in the Santa Clarita Valley?</p>	57-56

**11.5.1.1** – The fourth bullet states “CH<sub>4</sub> concentrations across the landfill surface are monitored to prevent seeping of CH<sub>4</sub> gas from the landfill surface”; however, there are no specifics on how this is or will be done. The DEIR must specify a minimum of gas probes needed for landfill gas monitoring. Gas probes must be installed off-site to protect the community from the potential for fire in this fire prone area, and also to protect residents in Val Verde and workers at the US Postal Service facility and other facilities in the Valencia Commerce Center from potentially harmful gases, such as hydrogen sulfide.

57-57

**11.5.1.2** – The listing of mobile tailpipe exhaust emissions generated during operation of the landfill does not include tailpipe emissions from trucks delivering trash to the landfill. A DEIR for a residential subdivision would have to include an air impact analysis of all vehicles coming and going from the new subdivision, why is there an exemption for landfills?

57-58

**11.6.3.2, Impact AQ-5** – “Emissions were not calculated for the material recovery facility, the truck storage and maintenance facility, or the LFGTE plant because operations associated with these facilities were assumed to be included with existing conditions and would not change with the Proposed Project”. These sources may not be a part of the proposed expansion, but they create pollutants associated with the current landfill, and should be added to the pollutant levels of the proposed expansion to show an accurate calculation of criteria pollutants to compare with their corresponding thresholds.

“Vehicle exhaust emissions from waste trucks were calculated and included in the air dispersion modeling and HRA, but were not included in the maximum daily operational totals per the SCAQMD *CEQA Air Quality Handbook* (SCAQMD, 1993).” This handbook is 21 years old, out of date, and currently under revision. If the vehicle exhaust emissions from the waste trucks were added, levels of NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> would increase substantially more and add to the emissions that in many cases already exceed daily emission thresholds.

57-59

“The Proposed Project would result in a net reduction in emissions from waste trucks when compared to the No Project Alternative”. This so called “reduction” cannot be measured since we don’t know where the trash trucks will be travelling to, in the No Project Alternative. It will certainly reduce emissions in the Castaic Area and that is what matters, as we already have a landfill with landfill gas emissions, whether or not this proposed expansion is approved.

**11.6.3.2, Impact AQ-7** – This section does not include the significant increase in NO<sub>x</sub> that will be coming from the additional 414 waste disposal trucks arriving daily at the landfill that have been left out of this calculation.

57-60

**11.6.3.2, Impact AQ-8** – The vehicle exhaust emissions from the proposed additional 414 off-site waste trucks have not been used in the calculations to represent operational

57-61

<p>impacts. The off-site waste trucks add more NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and diesel particulate emissions to the calculations, and add to the cancer risk, and that is not represented here.</p>	<p>57-61 cont'd</p>
<p><b>11.6.3.2, Impact AQ-10</b> – The DEIR uses criteria developed by the Bay Area Air Quality Management District (BAAQMD) to determine if the frequency of odor complaints classifies a project as a significant odor source or not. The frequency of these complaints cannot be evaluated by criteria from a different air district that has no jurisdiction over the existing Chiquita Canyon Landfill.</p>	<p>57-62</p>
<p><b>11.9.2.3, Health Impacts</b> - Section 11.6.1.1 states “according to the CEQA criteria listed, air quality impacts from the project will be significant”. This health impact section then summarizes the risk of three receptors in three different years, and then shows an acceptable level of cancer risk. This is an insufficient study. There should be an evaluation of the cancer risk associated with exposure to multiple years of emissions, as only years 2016, 2021, and 2032 are evaluated separately. Many people will work, go to school, or live near the landfill for many years in a row, and that will raise the risk exponentially.</p> <p>This section also does not include the significant increase in NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> that will be coming from the additional 414 waste disposal trucks arriving daily at the landfill that have been left out of the daily operational totals that make up this calculation. Additionally, there is also an increase in carcinogens that comes with the added diesel particulate from the trucks. I am concerned that the actual air impacts will show a significant health risk.</p> <p>A study should be conducted to examine the effects that the pollutants from the existing landfill and proposed expansion would have on a population that already has an increased risk for asthma and other lung diseases.</p>	<p>57-63</p>
<p><b>11.9.2.4, Odor Impacts</b> – The DEIR states “CCL will continue to implement current operational practices associated with odor control; therefore cumulative odor-related impacts are expected to be less than significant”. What are the odor control operational practices? It is stated that they will continue to implement current practices, but there have already been many odor complaints with these current practices in place and the landfill has not increased its capacity yet.</p>	<p>57-64</p>
<p><b>15.3.3</b> – This section falsely states “none of the ridgelines designated as significant by the CACSD will be affected by the Proposed Project. CCL is located in the CACSD (22.44.137) in Los Angeles County, and is not listed as exempt from section D.6, “Significant Ridgeline Protection”. The ridgelines surrounding CCL are also included on the CSD Map of Significant Ridgelines included in the CACSD; therefore CCL must comply with this section.</p>	<p>57-65</p>
<p><b>15.5.2</b> – This analysis is incomplete as it does not include a view from Newhall Ranch Road east of Interstate 5 where the landfill is already very visible. The proposed</p>	<p>57-66</p>

expansion from this angle will have a very significant impact on the view and the aesthetics of the Castaic Community. The analysis from the intersection of Commerce Center Drive and SR 126 is false, because a bridge is currently being constructed that is raising the elevation of SR 126 in this location significantly.

57-66  
cont'd

**15.6.1** – The mock-up or “b” versions of photos KOP 1 thru KOP 7 of the landfill after closure does not include the “20 foot wide benches at 50 foot elevation intervals” that are required in the final landfill cap as stated in DEIR section 2.2.8.3. It is fraudulent to depict the mock-up photo of a smooth natural looking landform in the DEIR.

57-67

**15.6.4.1** – There are informally designated scenic vistas within the Proposed Project area, and the landfill will have a significant impact on these scenic vistas. There is the view of the Santa Susanna Mountains, and the view of the Santa Clara River. Highway 126 has “eligible” status for scenic highway designation. The purpose of the scenic highway designation is to ensure the protection of highway corridors that reflect the state’s natural scenic beauty.

57-68

**16.3.1.2** – The version of OEHHA’s Cal/Enviroscreen 1.1 listed is not the current version of the program. Cal/Enviroscreen 2.0 became final on August 4, 2014, and is the most current version of the program that is used by Cal/EPA.

57-69

**16.5.1.1, Potential Impacts, Environmental Justice** – The proposed expansion project will disproportionately affect a predominantly minority and low income population in Val Verde. If this proposed expansion is approved, the county is creating an Environmental Justice issue by supporting the fact that a white middle class population in unaffected areas of northern Castaic are getting paid money by the landfill, for their service club, to influence the Castaic Town Council and Los Angeles County into approving a project that will negatively affect a predominantly Hispanic population that lives adjacent to the landfill. The county also did not provide information about the landfill expansion in Spanish, although the population in Val Verde is over 50% Hispanic. The Hispanic population in the areas close to the landfill will suffer financial and quality of life losses, as well as loss of health issues. The proposed landfill expansion is definitely an Environmental Justice issue.

57-70

**16.8.1 – Cumulative Impacts** – The project will result in significant potential health impacts to the Val Verde area, such as asthma and heart disease, and a potential increase in pulmonary fibrosis .

57-71

**17.2** – A significant impact will occur even before the Newhall Ranch Project is built if you factor in the extra NOx, PM<sub>10</sub> and PM<sub>2.5</sub> from the doubling of the waste disposal trucks (that was not added to the operational calculations); the doubling of the daily tonnage at the landfill and the resulting effects to air quality; the change to the landform that is significant and unavoidable and contributes to erosion and debris flows; the constant odors; and the potentially significant threat to surface and ground water.

57-72

<p><b>18.3.2</b> – By not considering a no project alternative or a smaller capacity alternative project proposal, the health of the Val Verde and Castaic communities is in danger.</p>	57-73
<p><b>18.4.3.2, Table 18-4</b> - The air quality section of the table addresses the impacts to the South Coast air basin as a whole and does not address the comparative air quality impacts to the proposed expansion on the residences in Val Verde and the Live Oak neighborhoods (as well as the proposed Newhall Ranch neighborhoods) versus the air quality impacts to residences from an alternative new site that could be more remote, and not having residences living right up against it. More specifics are needed in the description of the alternative site.</p>	57-74
<p><b>H.1.1.2, Operational Exhaust Emissions</b> - “Vehicle exhaust emissions from waste trucks were calculated and included in the air dispersion modeling and health risk assessment (HRA) to determine potential impacts to local receptors, but were not included in the maximum daily operational totals per the SCAQMD <i>CEQA Air Quality Handbook</i> (SCAQMD, 1993).” The SCAQMD CEQA Air Quality Handbook is 21 years old, out of date, and currently under revision. If the vehicle exhaust emissions from the waste trucks were added, levels of NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> would increase substantially more and add to the emissions that in many cases already exceed daily emission thresholds.</p>	57-75
<p><b>Appendix A, Comments to the NOP, Los Angeles County Public Works</b> - “All or portions of the site have been found to be located within a potentially liquefiable area according to the State of California Seismic Hazard Zone Map – Val Verde Quadrangle.” Is it safe to increase the landfill size when portions of the area on the site are subject to liquefaction?</p>	57-76
<p><b>Appendix H.1.5</b> – The DEIR uses criteria developed by the BAAQMD to determine if the frequency of odor complaints classifies a project as a significant odor source or not. The frequency of these complaints cannot be evaluated by criteria from a different air district that has no jurisdiction over the existing Chiquita Canyon Landfill.</p>	57-77
<p><b>Appendix H-2 Tables</b> - On page 3 of the Summary Data Request the DEIR states “Sources not a part of the proposed project and not included in the evaluation” and then lists: landfill gas emissions for existing capacity; operation of two existing flares; and operation of the waste to energy generation unit. How can the Health Risk Assessment be a valid indication of risk when these emissions are not included? These sources may not be a part of the proposed expansion, but they are risks associated with the current landfill, and should be added to the risks of the proposed expansion to show an accurate representation of the risks.</p>	57-78



# Letter No. 57

Ms. Nancy Carder  
30530 Remington Rd.  
Castaic, CA 91384

## Response to Comment No. 57-1

Comment noted. It should be noted that the Proposed Project is an expansion of an existing landfill that has been in operation in the same location for over 40 years.

## Response to Comment No. 57-2

Please see Topical Response #28, Waste Diverted.

## Response to Comment No. 57-3

Section ES.4.3. of the Original Draft EIR is a summary of landfill operation for the Proposed Project. Tables 2-3 and 2-4 of the Original Draft EIR Project Description detailed all of the traffic associated with the Proposed Project, including the increase in waste trucks to the site. Tables 2-3 and 2-4 of the Partially Recirculated Draft EIR provide an updated description of the traffic associated with the Proposed Project.

## Response to Comment No. 57-4

Please see Topical Response #26 for a discussion of Treated Auto Shredder Waste and Shredded Tires.

## Response to Comment No. 57-5

Please see Topical Response #27 for a discussion of Visual Resources, including ridgeline protection via the Castaic Area Community Standards District development restrictions.

## Response to Comment No. 57-6

The Landfill Gas-to-Energy Plant and Household Hazardous Waste Facility occupy a very small portion of the overall site (less than 2 acres of the 639-acre site). If Los Angeles County determines that a publicly accessible recreational use area is the appropriate post-project use of the site, future studies would be undertaken to ensure that all features of the future use are considered and evaluated.

## Response to Comment No. 57-7

Section ES.5.1 of the Original Draft EIR provided only a summary of alternatives evaluated. Original Draft EIR Section 18.3.2, Alternative Landfill Project Design, provided a more detailed discussion of why a smaller-scale expansion alternative was not evaluated in detail in the Original Draft EIR. Nevertheless, two smaller-scale expansion alternatives were evaluated in the Partially Recirculated Draft EIR; see Chapter 18, Project Alternatives, of the Final EIR.

Also see Topical Response #18 for a discussion of Project Alternatives.

## Response to Comment No. 57-8

Section ES.5.2.1 is a summary of potential air quality impacts. A detailed discussion of potential air quality impacts is included in Chapter 11, Air Quality.

### Response to Comment No. 57-9

Please see Topical Response #19 for a discussion of Project Need.

### Response to Comment No. 57-10

Please see Topical Response #11 for a discussion of Geologic Hazards.

### Response to Comment No. 57-11

Please see Topical Response #26 for a discussion of Treated Auto Shredder Waste and Shredded Tires.

### Response to Comment No. 57-12

Please see Topical Response #30 for a discussion of Water Quality.

### Response to Comment No. 57-13

Please see Topical Response #30 for a discussion of Water Quality.

### Response to Comment No. 57-14

Please see Topical Response #30 for a discussion of Water Quality.

### Response to Comment No. 57-15

While condors may forage at landfills, they are not known foragers at CCL. Figure 8-1 of the Biological Resources chapter of the Original Draft EIR shows the critical habitat range for the condor being quite a distance to the northwest of CCL. This species is a strict scavenger of carrion, and would not forage at the working face of the landfill, but in the more isolated areas where naturally deceased animals might be found. Condors are considered to have a low potential for occurrence at CCL, as described in Chapter 8, Biological Resources, of the Original Draft EIR, and the potential for impacts to condors is also considered low.

### Response to Comment No. 57-16

Section ES.6.6 is a summary of the Cultural Resources chapter. The actual wording of Mitigation Measure CR-1 is found in Chapter 9, Cultural and Paleontological Resources, as well as in the Mitigation Monitoring and Reporting Plan found in the Final EIR.

### Response to Comment No. 57-17

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, which also addresses potential cumulative air quality impacts of the project (including Newhall Land and Farming Company developments). Please also see Topical Response #1, Air Quality.

### Response to Comment No. 57-18

Please see Topical Response #27 for a discussion of Visual Resources.

### Response to Comment No. 57-19

Please see Topical Response #9, Environmental Justice. For a discussion of information translated to Spanish, please see Topical Response #22a, Public Scoping.

## Response to Comment No. 57-20

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

## Response to Comment No. 57-21

The referenced scoping letter (pages 101 through 107 of Appendix A) includes no indication of the sender's name and was incorrectly attributed to Scott Wardle. Chapter 1 of the Introduction has been changed to attribute this letter to Lloyd Carder.

## Response to Comment No. 57-22

The Proposed Project includes both a vertical and a horizontal expansion in order to maximize the air space available for waste disposal at CCL.

## Response to Comment No. 57-23

Please see Topical Response #28, Waste Diverted.

## Response to Comment No. 57-24

Please see Topical Response #26 for a discussion of Treated Auto Shredder Waste and Shredded Tires.

## Response to Comment No. 57-25

Please see Topical Response #26 for a discussion of Treated Auto Shredder Waste and Shredded Tires.

## Response to Comment No. 57-26

The flare does not attract birds.

## Response to Comment No. 57-27

Please see Topical Response #27 for a discussion of Visual Resources.

## Response to Comment No. 57-28

Please see Topical Response #10, Environmental Monitoring, for a discussion of surface and groundwater quality monitoring.

## Response to Comment No. 57-29

Currently, there is no onsite treatment of leachate. If leachate treatment were to be allowed onsite as a result of revised Waste Discharge Requirements (approved by the Regional Water Quality Control Board), CCL would locate an onsite treatment facility away from the community.

## Response to Comment No. 57-30

Please see Topical Response #10, Environmental Monitoring, for a discussion of surface water quality monitoring.

## Response to Comment No. 57-31

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions, as well as Topical Response #17, Odor.

## Response to Comment No. 57-32

Please see Topical Response #27 for a discussion of Visual Resources.

## Response to Comment No. 57-33

The County has found the Proposed Project to be consistent with existing and proposed future land uses. The Proposed Project has complied with all County requirements for notifications. Please see Topical Response #22 for a discussion of Public Scoping and Public Outreach for the Proposed Project.

## Response to Comment No. 57-34

The Proposed Project is in compliance with the Castaic Area Community Standards District guidelines.

Please see Topical Response #27, Visual Resources, for a discussion of the Proposed Project's consistence with the Castaic Area Community Standards District guidelines.

## Response to Comment No. 57-35

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

In addition, please see Topical Response #7 for a discussion of Cumulative Impacts.

## Response to Comment No. 57-36

CCL manages stormwater from the 639-acre site in compliance with the federal Clean Water Act, which guards against contamination that could come from the landfill to surface waters, including the Santa Clara River. Note that, in some years, no or very little runoff and offsite discharges occur. As required by the Clean Water Act, CCL has a National Pollutant Discharge Elimination System (NPDES) Permit from the Regional Water Quality Control Board that addresses specific design and applicable water quality standards at the facility. CCL manages, monitors, and discharges stormwater in accordance with the NPDES permit and the following additional plans that are required under the NPDES Permit: Stormwater Pollution Prevention Plan, Stormwater Monitoring Program, and Spill Prevention, Control, and Countermeasure Plan. These are described in Original Draft EIR Chapter 2, Project Description, Section 2.2.9.4, Surface Water Monitoring.

## Response to Comment No. 57-37

Please see Topical Response #30 for a discussion of Water Quality.

## Response to Comment No. 57-38

No samples have been collected since new benchmarks were established (see Table 1 of Storm Water Monitoring Program [included in Appendix D of the site Stormwater Pollution Prevention Plan, April 28, 2011]) because the sedimentation basins at CCL have increased storage capacity resulting in no surface water discharge. Please see Topical Response #10, Environmental Monitoring, for a discussion of surface and groundwater quality monitoring.

## Response to Comment No. 57-39

Original Draft EIR Chapters 5 (Geology and Hydrology) and 6 (Surface Water Drainage), address the potential for the Proposed Project to experience debris flow or mudflow. As designed and engineered, and described in the Original Draft EIR, the Proposed Project does not include the potential for mudflow to encroach outside of the landfill property.

### Response to Comment No. 57-40

Please see Topical Response #10, Environmental Monitoring, for a discussion of groundwater quality monitoring and leachate monitoring.

### Response to Comment No. 57-41

Please see Topical Response #10, Environmental Monitoring, for a discussion of surface and groundwater quality monitoring.

### Response to Comment No. 57-42

Please see Topical Response #10, Environmental Monitoring, for a discussion of groundwater quality monitoring.

### Response to Comment No. 57-43

Please see Topical Response #10, Environmental Monitoring, for a discussion of groundwater quality monitoring.

### Response to Comment No. 57-44

Please see Topical Response #30 for a discussion of Water Quality.

### Response to Comment No. 57-45

While condors may forage at landfills, they are not known foragers at CCL. Figure 8-1 of the Biological Resources chapter of the Original Draft EIR shows the critical habitat range for the condor being quite a distance to the northwest of CCL. This species is a strict scavenger of carrion, and would not forage at the working face of the landfill. Condors are considered to have a low potential for occurrence at CCL, as described in Chapter 8, Biological Resources, of the Original Draft EIR and of the Partially Recirculated Draft EIR, and the potential for impacts to condors is also considered low.

### Response to Comment No. 57-46

Please see revised Chapter 8, Biological Resources, of the Partially Recirculated Draft EIR, for a discussion of measures protective of nesting birds.

### Response to Comment No. 57-47

Please see revised Chapter 8, Biological Resources, of the Partially Recirculated Draft EIR, which includes an expanded discussion of bats.

### Response to Comment No. 57-48

Please see revised Chapter 8, Biological Resources, of the Partially Recirculated Draft EIR.

### Response to Comment No. 57-49

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

### Response to Comment No. 57-50

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

### Response to Comment No. 57-51

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

## Response to Comment No. 57-52

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

## Response to Comment No. 57-53

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

## Response to Comment No. 57-54

BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the Mitigation Monitoring and Reporting Plan (MMRP) included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the South Coast Air Quality Management District (SCAQMD), who will oversee compliance with permit conditions and dust control plans.

## Response to Comment No. 57-55

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR. Please also see Topical Response #1, Air Quality.

## Response to Comment No. 57-56

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects, and Topical Response #10, Environmental Monitoring.

## Response to Comment No. 57-57

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects, and Topical Response #10, Environmental Monitoring.

## Response to Comment No. 57-58

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

## Response to Comment No. 57-59

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects, and Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

## Response to Comment No. 57-60

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

## Response to Comment No. 57-61

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

## Response to Comment No. 57-62

The revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, uses an odor impact assessment approved by the South Coast Air Quality Management District. Please see Topical Response #17, Odor.

## Response to Comment No. 57-63

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, which includes an updated health risk assessment for the Proposed Project. Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions; and Topical Response #1e, Methods and Models Used in Health Risk Assessment, and Impacts to Surrounding Neighborhoods. Please also see Topical Response #21, Public Health.

## Response to Comment No. 57-64

Please see Topical Response #17, Odor.

## Response to Comment No. 57-65

Please see Topical Response #27 for a discussion of Visual Resources.

## Response to Comment No. 57-66

Please see Topical Response #27 for a discussion of Visual Resources.

## Response to Comment No. 57-67

Please see Topical Response #27 for a discussion of Visual Resources.

## Response to Comment No. 57-68

Please see Topical Response #27 for a discussion of Visual Resources.

## Response to Comment No. 57-69

Chapter 16, Environmental Justice and Socioeconomics, of the Original Draft EIR, does not address Office of Environmental Health Hazard Assessment's CalEnviroscreen. However, please see Topical Response #21, Public Health, for a discussion of CalEnviroscreen 3.0.

## Response to Comment No. 57-70

Please see Topical Response #9, Environmental Justice, and Topical Response #22, Public Scoping and Public Outreach.

## Response to Comment No. 57-71

Please see the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, as well as Topical Response #1, Air Quality, and Topical Response #21, Public Health. Existing locations of sensitive receptors, such as schools, and locations of planned schools, residences, and businesses are included in the air quality and health risk analyses for the Proposed Project and Cumulative Impacts analyses for the Proposed Project, even if not specifically identified in the text of the Air Quality chapter. Please see Chapter 11 and Section 11.9 of the Partially Recirculated Draft EIR.

Meteorological data inputs for the Health Risk Assessment are provided in Appendix H, which incorporates observed meteorological data trends. Please also see Topical Responses #1c, #1d, and #1e, Air Quality, for additional information.

## Response to Comment No. 57-72

The Original Draft EIR for the Proposed Project concluded that potential impacts associated with landform change, erosion and seismic hazards, odor, and surface and ground water would be less than significant. These potential impacts are discussed in detail in Chapter 5, Geology and Hydrogeology; Chapter 6, Surface Water Drainage; Chapter 11, Air Quality; and Chapter 15, Visual Resources.

Additional information about potential air quality impacts, including particulate matter and odors, can be found in the Air Quality chapter of the Partially Recirculated Draft EIR (Chapter 11).

In addition, please see Topical Response #7, Cumulative Impacts, and Topical Response #17, Odor.

## Response to Comment No. 57-73

The revised Chapter 18, Project Alternatives, of the Partially Recirculated Draft EIR, evaluated a No Project Alternative and two smaller capacity alternatives. Please also see Topical Response #18, Project Alternatives.

## Response to Comment No. 57-74

Please see Topical Response #18, Project Alternatives.

## Response to Comment No. 57-75

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

## Response to Comment No. 57-76

Please see Topical Response #11 for a discussion of Geologic Hazards.

## Response to Comment No. 57-77

The revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR uses an odor impact assessment approved by the South Coast Air Quality Management District. Please see Topical Response #17, Odor.

## Response to Comment No. 57-78

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects.

October 22, 2014

***Via Electronic Mail***

Iris Chi  
Zoning Permits Section Room 1345  
Los Angeles County Department of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012  
[ichi@planning.lacounty.gov](mailto:ichi@planning.lacounty.gov)

***Re: Chiquita Canyon Landfill Expansion Draft Environmental Impact Report, Project No. R2004-00559-[5] SCH No. 2005081071***

Dear Zoning Permits Section, Los Angeles County Department of Regional Planning:

Thank you for the extended opportunity to comment on the proposed Chiquita Canyon Landfill Expansion Project (Proposed Project or Project).<sup>1</sup> My office has been privileged to participate in discussions, both public and private, with members of the Citizens for Chiquita Canyon Landfill Compliance (“**C4CCLC**”). This *ad hoc* group is comprised of concerned citizens of the impacted community of Val Verde, who seek to exercise their right to participate — in an informed and meaningful way — in the review and approval (or denial) process for the new Conditional Use Permit requested by the Chiquita Canyon Landfill from the County of Los Angeles Department of Regional Planning (“**DRP**”) in order to massively increase the size of the landfill.

I am submitting these brief comments on my own behalf and on behalf of Val Verde resident and C4CCLC member Dr. S. Faye Snyder, by

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<sup>1</sup> We reserve the right to supplement these comments at any hearing or proceeding on the Proposed Project. (See *Galante Vineyards v. Monterey Water District* (1997) 60 Cal. App. 4th 1109.)

whom my office has been formally retained. The concerns expressed are based upon the first-hand information presented by certain members of C4CCLC during such discussions, review of their comments to the Draft Environmental Impact Report (DEIR) for the Proposed Project, my own review of the DEIR as a resident of the unincorporated area of Los Angeles County likely to be impacted by the Proposed Project, and the applicable statutes, regulations and established case law referenced herein. Attached hereto as Exhibits A-C, and incorporated into this letter by reference, are detailed comments prepared by Dr. Snyder and certain other members of C4CCLC to the DEIR's Chapter 11 Air Quality; Chapter 12 Greenhouse Gas Emissions and Climate Change; and Chapter 13 Noise.

We appreciate the County of Los Angeles' (County) intention to conduct a detailed review of the Proposed Project, as suggested by the length of the DEIR. However, this DEIR, and the process around it, falls far short of what is required by the California Environmental Quality Act (CEQA). In fact, and despite the initial extension of the comment period, the length of the document and time provided for review "defends it well against the risk of its being read."<sup>2</sup> "An EIR is an informational document," and the County has simply not provided the relevant information that "will inform public agency decision makers and the public generally of the significant environmental effects of the project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project." (See 14 Cal. Code. Regs. § 15121, subd. (a).)

58-1

Moreover, there has been no offer of effective or substantive Spanish language interpretation services at any public hearing for the Proposed Project. None of the formal documentation concerning the Proposed Project, including the DEIR itself, has been made available in Spanish. This, despite the fact that 58.44% of the population of the closest neighborhood to the landfill, Val Verde, speak Spanish at home.<sup>3</sup>

58-2

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<sup>2</sup> Paraphrase of quote attributed to Sir Winston Churchill. (See <http://quotes.lifehack.org/quote/winston-churchill/the-length-of-this-document-defends-it/>, accessed October 22, 2014.)

<sup>3</sup> According to the 2012 U.S. Census American Community Survey.

In *El Pueblo Para el Aire y Agua Limpio v. County of Kings*, the state trial court ruled that the EIR should have been translated where only 40% of the local population that would be affected by the siting of a hazardous waste incinerator was monolingual Spanish speakers (Superior Court of California, County of Sacramento, No. 366405 10 (1992).) In this case, the language barrier in the area immediately surrounding the Proposed Project appears to be much higher.

58-2  
cont'd

CEQA provides that “[e]very citizen has a responsibility to contribute to the preservation and enhancement of the environment.” (Pub. Res. Code § 21000, subd. (e).) Denying citizens equal language access to important public hearings and legally-required disclosure documents for this Project affecting the future of their community, their health and quality of life is plainly inconsistent with the letter and spirit of California’s environmental review process.

We respectfully request that the County revise and recirculate the DEIR in accordance with CEQA. We further request that with the recirculation, the County allows an appropriate amount of time for public consideration of the document and any future hearings and documentation related to the Proposed Project provide adequate Spanish language access.

With respect to an EIR’s contents, the DRP is entrusted with the responsibility of “provid[ing] public agencies and the public in general with detailed information about the effects which a proposed project is likely to have on the environment; [listing] ways in which significant effects of such a project might be minimized; and [indicating] alternatives to such a project.” (Pub. Res. Code § 21061; *see* CEQA Guidelines § 15002, subd. (a).) These requirements are real and not mere technicalities:

58-3

“As our Supreme Court has recently emphasized, ‘The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR’s function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been taken into account. For the EIR to

serve these goals it must present information in such a manner that the foreseeable impacts of pursuing the project can actually be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made.”

*(Communities for a Better Environment v. City of Richmond* (2010) 184 Cal. App. 4th 70, 79 & 80 (*Communities for a Better Environment*) (citing *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449 & 450).) The EIR must not be obscure or incomplete, confusing or self-contradictory, or merely conclusory. (See *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 443; *San Joaquin Raptor Center v. County of Merced* (2007) 149 Cal. App. 4th 645, 656 fn. 4 (*San Joaquin Raptor*); *Citizens of Goleta Valley, supra*, 52 Cal.3d at 568-569 [“As we have frequently observed, it is only the EIR that can effectively disclose to the public the ‘analytic route the ... agency traveled from evidence to action.’... In general ‘the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions.’” (citations omitted).])

58-3  
cont'd

Consistent with this informational nature of an EIR, the DRP must recirculate an EIR “when significant new information is added to the EIR.” (CEQA Guidelines § 15088.5, subd. (a).) Significant new information includes: (1) a new significant environmental impact resulting from the project or from a new proposed mitigation measure; (2) “substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;” (3) a “feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it;” or (4) the “DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.” (CEQA Guidelines § 15088.5, subd. (a)(1) – (4); see also *Mountain Lion Coalition v. Fish and Game Commission* (1980) 214 Cal.App.3d 1043, 1052 (*Mountain Lion Coalition*).)

58-4

If the EIR does not serve as an informational document, it fails to comply with the letter and spirit of CEQA. Judicial review of an EIR is based on an abuse of discretion standard, which “is established if the agency has not proceeded in a manner required by law or if the determination or decision is not supported by substantial evidence.” (Pub. Res. Code § 21168.5) A “prejudicial abuse of discretion occurs ‘if the failure to include relevant information precludes informed decision making and informed public participation, thereby thwarting the statutory goals of the EIR process.’” (*Berkeley Keep Jets Over the Bay Committee, supra*, 91 Cal.App.4th at 1355 [citations omitted].) In order to determine whether such a prejudicial abuse of discretion has occurred, courts perform a pragmatic analysis involving “an evaluation of whether the discussion of environmental impacts reasonably sets forth sufficient information to foster informed public participation and to enable decision makers to consider the environmental factors necessary to make a reasoned decision.” (*Id.* at 1356; *see also San Joaquin Raptor, supra*, 149 Cal.App.4th at 653 (*citing Association of Irrigated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1390) [“When assessing the legal sufficiency of an EIR, the reviewing court focuses on adequacy, completeness and a good faith effort at full disclosure.”].)

58-5

As detailed in this letter, including the attached public comments by certain members of the C4CCLC, this DEIR fails to include sufficient information to provide meaningful review of the Proposed Project. Without any limitation of the foregoing, the DEIR’s conclusions and analysis with respect to Air Quality; Greenhouse Gas Emissions and Climate Change; Noise; and Project Alternatives are materially flawed. Likewise, many of the mitigation measures described in the DEIR are inadequate, unenforceable, or improperly deferred until after the close of the CEQA process, with no trigger for mandatory implementation. To date, the formal process for review of the Proposed Project has improperly excluded a sizable protected class of citizens — the Spanish-speaking community which makes up the majority of the residents of Val Verde.

58-6

For these reasons, we urge the County to revisit and recirculate its analysis of the Proposed Project, providing adequate Spanish language access from this point forward, to correct the serious concerns described

above, and identify meaningful, enforceable, and effective mitigation measures.

58-6  
cont'd

Respectfully,

A handwritten signature in black ink, appearing to read "J. Kline".

Justin S. Kline, Esq.

Attachment 6

September 10, 2014

Iris Chi  
Zoning Permits Section Room 1345  
Los Angeles County Department of Regional Planning  
320 W. Temple Street  
Los Angeles California 90012

Re: Chiquita Canyon Landfill Expansion Draft Environmental Impact Report  
Project No. R2004-00559-(5) SCH No. 2005081071

**Informed Decisions and the Request for Air Quality Monitors before evaluating the DEIR.**

Dear Ms. Chi:

As a resident of Val Verde, I am concerned about the draft environmental impact report, because **no intelligent decision can be made by anyone without information from the air quality monitors** we were promised 15 years ago. The DEIR has been based upon air quality monitors in Reseda and Burbank, as well as Newhall (still much too far away). Even if the latter monitor were placed nearby, according to the most recent information available, the Newhall monitor doesn't measure vinyl chloride, sulfur dioxide and particulate matter. Thus, the entire DEIR evaluation is hypothetical and based upon useless data.

If we had air quality monitors—for methane (CH<sub>4</sub>), ammonia (NH<sub>3</sub>), vinyl chloride (C<sub>2</sub>H<sub>3</sub>CL), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), hydrogen sulfide (H<sub>2</sub>S), carbon monoxide (CO), ozone (O<sub>3</sub>), particulate matter with aerodynamic diameters equal to or less than 10 microns (PM<sub>10</sub> & PM<sub>2.5</sub>), diesel fumes and visually obstructive matter—posted in the vicinity of Lincoln Avenue and central Val Verde, and if the county provided neutral, trained air quality monitor “readers” (professional evaluators) and record-keepers, we would not be speculating about whether or not the landfill is dangerous. We would know exactly what needs to be done for it to be safe or whether it is too dangerous for animals and human health in Val Verde to extend and expand the landfill. At this point the argument to find places to dump garbage in remote areas would become poignant, rather than obstructionist and it would no longer be necessary to speculate whether we are alarmists or heroes. Then, we would know what we were bargaining for. Air quality monitors in Val Verde would be the great clarifier.

Thank you for your time.

Sincerely yours,

*Faye Snyder, PsyD*  
30263 TRELIS ROAD  
VAL VERDE, CA 91384-2484

Exhibit B

12.2.1.1

Please clarify the steps the landfill will be using to ensure that idling time is minimized. Please clarify how the procedures the landfill has in place to limit idling time for Diesel trucks backed up on Highway 126 and on the Interstate 5 corridor. Since trucks are idling outside the landfill now it would be safe to assume a new plan of action has been drafted.

58-7

Please clarify and list the manufacturer's written emission-related instructions for all equipment that CCL is referring to.

**CONSTRUCTION EXHAUST EMISSIONS**

Please clarify and recalculate to include the diesel travel from origin of load pick up, to landfill land back to origin of pick up, making sure to include trucks that travel from as far as Sacramento or Victorville. Please refactor using CARB update and compare the new figures to the previous figures. Please use more than one formula for on road vehicle exhaust emissions.

58-8

12.2.1.2 Operational Emissions

Please use both graphs for traffic the one that gives an A grade and the one that gives an F grade. Since the F grade has trucks idling far from the landfill as they are stuck in the backup of traffic it would be wise to recalculate. Please recalculate for worst scenario as well as for the best. The F grade was a much newer graph, taking into account the population growth of recent years and would be much more accurate and honest in its figures then the one presented by CCL.

58-9

**Mobile Source Exhaust Emissions**

Please recalculate using CARB's updated version of the OFFROAD model. Please clarify how waste trucks will travel off site 6 miles per day when CCL will be taking in 12 thousand tons a day. Please clarify where the trucks traveling off site will be traveling too. Please clarify if the 12,000 tons daily would be coming from Santa Clarita, which itself is more than 6 miles away. Please clarify why the idling time is 3.5minutes in section 12.2.1.2, but in chapter 11 it is 2 minutes.

58-10

**Mobile Source Exhaust Emissions.**

Please recalculate exhaust levels using updated CARB versions.

58-11

**Stationary source exhaust emissions**

Please clarify how much 85% percent of LFG will be daily. Please clarify if the flares release any fine particles of LFG or any other pollutants into the air. Please clarify as to why less

58-12

methane being burned, which would result in more Methane than estimated would result in an overall GHG impact less than estimated. 58-12 cont'd

**Fugitive Landfill Gas Emissions**

Please clarify the 15 percent of LFG generated would be emitted as fugitive CO2 and CH4; what amount would that be daily. Please clarify the amount of CO2 and CH4 is now released daily. 58-13

**Emissions from Consumption of Purchased Electricity**

Please clarify how the Landfill will be using the same electricity but will be running more hours. 58-14

**12.3.2 State Regulations and Standards**

Please provide the documentation for CCL that will demonstrate that the landfill gas heat input capacity is less /more than 3.0 MMBtu/hr. 58-15  
Please list CCL's current collection and control system; please include the level of current methane levels in percentages. Please clarify when and why methane levels were higher than what is allowed over the last ten years.

**CARB Interim Significance Thresholds for GHGs under CEQA**

Please list the procedures CCL's and current plans to achieve feasible mitigation in the event that CCL exceeds the recommended threshold. 58-16

**SCAQMD Landfill Rule**

Please provide the current levels of CH4 and NMOC emissions and to what percent they have been reduced in the LFG collection and control system. 58-17

**12.5.1 Landfill Gas Surface Emissions**

Please provide the current level of CH4 being produced at CCL, if not able to provide the current level then please give best estimate. 58-18  
Please clarify how gas escapes the landfill in a quantitate amount; 15 percent of the gas generated in the landfill is much to vague.  
Please clarify at what levels Nitrogen and oxygen concentrations are at now; please list the steps, procedures, personal, and equipment that measure Nitrogen and Oxygen along with the level of accuracy.  
Please list the procedures taken if the LFG temperatures at the gas extraction wells are found to be to high for safety.  
Please list steps and procedures that are in place once CH4 has been found to be seeping from the surface.

Please clarify the composting operation and where that was found in the Odor section in chapter 11. Please include an odor plan for the composting operation. Please describe what an equipment maintenance facility is capable of when it comes to day to day activities at the landfill.

58-18  
cont'd

#### 12.5.2 Mobile Source Emissions

Please include the impact of the mobile tailpipe exhaust emissions generated from onsite service trucks, heavy equipment, collection trucks, transfer trucks, passenger vehicles that deliver various waste materials, and passenger vehicles associated with landfill employee commuting; please make sure to factor these into related areas from chapter 11. Chapter 11 seems to be missing much of these things.

58-19

#### 12.6.3 Proposed project impacts.

12.6.3.1. Please clarify; the project will generate construction-related GHG emissions, but the emissions are not included in the 7,000-MTCO<sub>2</sub>e/yr threshold and would not hinder or delay California's ability to meet the reduction targets contained in AB 32. This would seem deceptive; since CCL is included in AB 32 then the GHG's should be added to California's overall GHG emissions. Please calculate the GHG's expected to be present for this particular project.

58-20

#### Table 12-2:

It is clear that trucks and cars carrying loads to and from the landfill are missing from table 12-2: Please factor trucks and cars along with their estimated distance traveled and exhaust that would be released into the atmosphere and make sure that Table 12-2 represents all vehicles.

58-21

Please clarify and list the dangers of GHG to the nearby communities due to the concentration within and near the landfill. Please compare it with any tables from EPA and from SCAQMD.

#### 12.6.3.2 Operational Emissions

##### Impact GHG-1:

Please clarify as to why the significance is not listed in the tables in chapter 11. Please recalculate cancer risk and readjust figures compared to SCAQMD table making sure to include the significant emissions from GHG that was lacking in chapter 11. Please ensure the CCL is bonded and no longer is a limited liability company; to not ensure will hold the county accountable to the law suits due to increased health dangers.

58-22

To not include equipment exhaust in the evaluation of the operational emissions impact is deceptive at best. Make sure to include exhaust in the evaluation of the operational emissions and add that to the cancer risk rates in chapter 11. The fact that these are not factored in is misleading the nearby neighbors into a false sense of security. Chapter 11 says cancer rate will be in the 5's which is well below the 10's, but in reality it will be well above the 10's; to

deny this is fraudulent. Please inform Val Verde and nearby residents for how long this practice has been occurring.

58-22  
cont'd

**Onsite Equipment Emissions**

Please provide a new table 12-4 that would include all or the majority of the machines running simultaneously beginning from the first day of landfill operations. Please include the emission factors for N2) and for CH4 emissions.

58-23

**Landfill Gas Emissions**

Please include the current methane levels that the landfill releases so the reader will know what 50% of a given number is. Please include your best estimate to the amounts of Methane that is escaping to adjacent properties. Please give a number of what 85% is in reference to. Please define "Conservatively assuming" which leads the reader to believe that there is much more gas escaping then is being admitted to. Please list the dangers of CO2 to nearby residents.

58-24

**Flaring Emissions**

Please provide another table that might actually mirror the reality, maybe a table with 75% percent recovery of LFG and a flare destruction efficiency of 85%. Please clarify and list the current percent recover of LFG and flare destruction efficiency.

58-25

**Disposal Vehicle/Transportation Emissions**

Please ensure that the heavy duty trucks transporting refuse exhaust is included in chapter eleven air quality reports; to not do so would be deceiving.

58-26

**Subsequent Phase Preparation**

Please clarify why excluding emissions from cell construction would provide a comprehensive estimate of construction emissions.

58-27

**Combined Operational Emissions for Comparison to the Threshold**

Please make report as accurate as possible and include construction and transportation emissions. To not include construction and transportation misrepresents the percent that is actually being emitted from the CCL expansion. Roughly 0.09 is vague and subject to interpretation and dismissal down the road. Please include all factors when presenting facts to the public and in the draft DEIR.

58-28

**Project-Level Significance Determination**

Please factor into the cancer risk in chapter eleven that the proposed project exceeds the CARB significance threshold, and is therefore significant. Please include all dangers, and do not try to spread them out over chapters as to mislead the public.

58-29

**Carbon "Sink" and Sequestration**

58-30

Please list the procedures in the removal of carbon from the carbon cycle and permanently sequestered. Please clarify the machinery and the expected emissions that will be required in the process and the machineries impact to the environment and to the cancer risk in chapter 11.

Please list the dangers to residents living so close to a landfill that will have 21.6 million tons of co2e. Since the slow decay of woods and other materials may offset the landfill emissions please define why the landfill should be allowed to expand so near to residents with so many uncertainties. Please provide testing/tables with procedures listed in this section in order to offer the community more insight to the dangers or no dangers of living so close to a landfill that cannot provide accurate measurements on so many variables.

58-30  
cont'd

**Additional Mitigation Measure required Through the CEQA Process.**

Please clarify how the Draft DEIR does not allow idling from 2 minutes, then 3.5 minutes, to 5 minutes in chapter 12. Please clarify how the idling time will be enforced. Please clarify how the idling time will be enforced when the traffic in one of the figures from the traffic section is an F. Since the table in the traffic section with an F rating is the one that factors in the current size of the communities it would be safe to assume that that figure is much closer to reality then the one the landfill is using for their estimates. Please factor in a figure more like a idling time of 30 minutes along the five and 126 corridors; then add it to the cancer risk in chapter 11 which is lacking in the exhaust dangers of cars and trucks idling as they wait for their turn at the landfill.

58-31

Please list at what age equipment will be retired. Gas fans and misters that are near 17 years old seem to do little compared to electric equipment that is now on the market. The flaw is that it is stated, "When supplemental landfill equipment is purchased, new commercially available equipment will be purchased that meets or exceeds California's emission standards in effect at the time of purchase." The flaw is in the fact that very little equipment has been bought over the last 17 years, with no one to hold CCL accountable to buying the best equipment out there, the community suffers. Please list when the newest equipment will be bought from the time it is introduced on the market. It would be best if within a year of better and improved machinery arriving on the market the landfill purchases such said equipment. That holds CCL accountable.

58-32

**12.6.3.3 Conclusion**

Please include other options that are working at other landfills; so the project will not be significant. Please clarify the reasons a potentially significant damaging project to the environment should continue.

58-33

**12.8 Significance After Mitigation**

Please clarify who decides what is possible, if CCL decides then much less will be done, if a governing agency decides then hopefully more will be done.

58-34

**12.9 Cumulative Impacts**

**12.9.1 Potential Cumulative Impacts**

58-35

Please clarify why GHG are significant and then not significant. Having a landfill that is one of the most expansive in the United States should be considered a large project and should be more than significant to the GCC's added to the environment. To underplay it in sections is deceptive. To suggest that a landfill can stop trucks from idling 2 minutes, 3.5 minutes or even within 5 minutes is also misleading. To use figures that are outdated for traffic and use them as good faith is deceptive and extremely misleading.

58-35  
cont'd

The draft DEIR pointed out the dangers of so many other variables that could result in California's Environmental uncertainty such as reduction in the Sierra snowpack which could result in a risk to hydropower, a reduction in the Sierra snowpack that could result in a loss of winter recreation from insufficient snow for skiing and snowboarding, a decrease in water supply could negatively impact the food supply, climate change could increase temperatures, leading to decreased supply of certain agricultural products such as wine, fruit, nuts, and milk, Climate change could result in plant and animal species relocation to cooler, more habitable "up-slope" locations, climate change could negatively affect the health and productivity of California's forest, Climate change could result in up to a 55 percent increase in wildfires, and a rise in sea levels could result in increased coastal floods and shrinking beaches.

58-36

With so many uncertainties that the Draft DEIR has pointed out it would probably be best to table such a huge expansion. An expansion of this magnitude could tip the scales and endanger the California that is so precious to so many. It would seem having a project at this time that would be significant in Global Warming would be an unwise step.

### **12.9.3 Significance after Mitigation**

It would seem that this is all subjective. The fact that so many things are not factored into this Draft DEIR would lead the reader to believe that it will be a significant impact for years to come. Please guarantee in a contract that the impact will not be significant; in that contract include hefty fines on CCL if it is found that the estimates were all off. Please set up a bank account for those fines to be used by nearby residents to ensure that they can get the medical attention they will need.

58-37

Exhibit C

**Chapter 13.**

**13.2.3 Operation Noise**

Please clarify and refigure the numbers, the current intake is approximately 3,000 tons per day; that would be four times what is taken in, not double. That would also include 4 times the noise level of today.

58-38

13.2.3 (1)

Please offer noise measurements of actual landfill operating activities sometime after 2011, not 2005 due to the fact that 9 years has passed.

13.2.3 (2)

The increase of 3 dBA would be in question since current noise measurements have not been used.

13.2.3 (5)

Please include atmospheric absorption as the analysis needs to be as close to reality as possible.

13.2.3 (6)

Please clarify and list the procedures and equipment used if noise abatement measures are needed when and if the project exceeds the requirements.

58-39

**13.3 Regulatory Setting**

**13.3.1 Local Criteria**

Please clarify the procedures in place to measure noise level at CCL on a daily/hourly basis. Please clarify the procedures in place to measure escaping noise levels for the residents closest to the landfill; include a plan for 24 hours on any operational day, as the landfill will be active for the entire time.

Please list the enforcers/employee's that will be responsible to ensure that construction activities which result in a noise disturbance at residential or commercial properties are prohibited between the hours of 7:00 p.m. and 7:00 a.m. or at any time on Sunday. Please clarify and list all construction activities along with the machinery which would result in a noise disturbance during any given day.

58-40

**13.4 Project setting** The following sections describe the existing noise environment in the Proposed Project area.

**13.4.1 Operation**

58-41

<http://www.valverdecac.com/pdf/StatementofAgreements.pdf>

Please post document to response. Conditional Use Permit (DUP) No. 89-081(5) does not allow the landfill to operate 24 hours per day. There are no such provisions in this document. Please research document and provide proper data in the DEIR. CCL is never allowed to operate on up to four Sundays during quarterly Val Verde cleanup days. The days are Saturdays; please fix errors.

58-41  
cont'd

The 184 times that CCL operated 24 hours was unknown to Val Verde residents until this exact moment. No such agreement allows any such activity.

Nowhere in the CUP No. 89-081(5) allows composting activities to occur 24 hours per day, 7 days per week. Please find section and quote entire section as it is written.

5. Val Verde Civic Association agrees to oppose any action by any party to deny CUP 89-081- (5) during the appeals process and subsequent regulatory approval process. The parties agree the Val Verde Civic Association is solely responsible for defining how its opposition takes place. Val Verde Civic Association further agrees to support the continuation of operations of existing CUP 1809-5 should this become necessary because the permittee is precluded from operating under proposed CUP 89-081 as a result of a lawsuit.

58-42

#### 13.4.2 Existing Equipment

Please clarify the landfills definition of as needed, for some it is monthly/weekly/ or when it breaks down.

58-43

#### 13.4.4 Measured Existing Noise Levels

Please mail and maintain noise survey for the residents within 1000 feet of the landfill as the crow flies. It has been noted at the Val Verde Civic Association Meetings that residents have complained of noise emanating from the landfill during sleeping hours.

Please date when short-term noise level measurements were conducted as residents are unaware of any such testing.

Please list steps and procedures to ensure that sound level will not be exceeded as it was in table 13-6. Keep in mind that it will be 4 times the trash and 24 hours a day, which is not allowed now. Please fix documentation that says it is allowed.

58-44

#### 13.5.2 Proposed Project

##### 13.5.2.1 Construction

Please clarify if construction will only be during the day; expected is vague and cannot be maintained. As we have found out that the closing of the landfill every night was not maintained for 184 24 hour periods in 2012. Please provide a schedule that will be enforced

58-45

for heavy equipment, include operation hours for each piece of heavy equipment and hours of non-operation of heavy equipment.

The natural barrier does not stop the sound now. Please clarify that the nearest house is 500 feet as the crow flies, but it is 1,200 feet from the landfill when defining the construction phase. Please make sure that your data is accurate.

The volume of truck traffic will be four times what it is today, today it is significant and to say it will be less than significant when one of the models posted gives the congestion an "F" is less than honest. Please reword to a more accurate reality.

58-45  
cont'd

**13.6.1. and 13.6.2 Construction and Operation**

Please include a mitigation plan for residents who are awakened by the operations of the CCL activities and expansion project.

58-46

# Letter No. 58

Justin Kline  
Law Office of Justin Kline  
26415 Summit Circle, Suite A  
Santa Clarita, CA 91350

## Response to Comment No. 58-1

Please see Topical Response #22, Public Scoping and Public Outreach.

## Response to Comment No. 58-2

Please see Topical Response #22, Public Scoping and Public Outreach.

## Response to Comment No. 58-3

The Lead Agency, after detailed review by its own staff and by that of other County agencies, released the Original Draft EIR and the Partially Recirculated Draft EIR for public review and comment. It did so only after ensuring that the Original Draft EIR and Partially Recirculated Draft EIR contain sufficient relevant information regarding potential environmental impacts of the Proposed Project.

## Response to Comment No. 58-4

The Lead Agency, after detailed review by its own staff and by that of other County agencies, released the Original Draft EIR and the Partially Recirculated Draft EIR for public review and comment. It did so only after ensuring that the Original Draft EIR and the Partially Recirculated Draft EIR contain sufficient relevant information regarding potential environmental impacts of the Proposed Project.

## Response to Comment No. 58-5

The Lead Agency, after detailed review by its own staff and by that of other County agencies, released the Original Draft EIR and the Partially Recirculated Draft EIR for public review and comment. It did so only after ensuring that the Original Draft EIR and the Partially Recirculated Draft EIR contain sufficient relevant information regarding potential environmental impacts of the Proposed Project.

## Response to Comment No. 58-6

The Lead Agency, after detailed review by its own staff and by that of other County agencies, released the Original Draft EIR and the Partially Recirculated Draft EIR for public review and comment. It did so only after ensuring that the Original Draft EIR and the Partially Recirculated Draft EIR contain sufficient relevant information regarding potential environmental impacts of the Proposed Project.

Please also see Topical Response #22, Public Scoping and Public Outreach.

## Response to Comment No. 58-7

Please see Topical Response #25 for a discussion of Traffic, including idling time.

## Response to Comment No. 58-8

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-9

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-10

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-11

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-12

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-13

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-14

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-15

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-16

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-17

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-18

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-19

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-20

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-21

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-22

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-23

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-24

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-25

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

## Response to Comment No. 58-26

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

### Response to Comment No. 58-27

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

### Response to Comment No. 58-28

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

### Response to Comment No. 58-29

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

### Response to Comment No. 58-30

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

### Response to Comment No. 58-31

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

### Response to Comment No. 58-32

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

### Response to Comment No. 58-33

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

### Response to Comment No. 58-34

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

### Response to Comment No. 58-35

Please see the revised Greenhouse Gas Emissions and Climate Change chapter included in the Partially Recirculated Draft EIR. Please also see Topical Response #7, Cumulative Impacts.

### Response to Comment No. 58-36

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

### Response to Comment No. 58-37

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR. This chapter concludes that the potential Greenhouse Gas Emissions and Climate Change impacts are potentially significant after the year 2020.

### Response to Comment No. 58-38

Please see Topical Response #16 for a discussion of Noise.

### Response to Comment No. 58-39

Please see Topical Response #16 for a discussion of Noise.

### Response to Comment No. 58-40

Please see Topical Response #16 for a discussion of Noise.

### Response to Comment No. 58-41

Please see Topical Response #16 for a discussion of Noise.

### Response to Comment No. 58-42

Please see Topical Response #16 for a discussion of Noise.

### Response to Comment No. 58-43

Please see Topical Response #16 for a discussion of Noise.

### Response to Comment No. 58-44

Please see Topical Response #16 for a discussion of Noise.

### Response to Comment No. 58-45

Please see Topical Response #16 for a discussion of Noise.

### Response to Comment No. 58-46

Please see Topical Response #16 for a discussion of Noise.



**Val Verde Civic Association comments to Chiquita Canyon  
Landfill Master Plan Revision Draft Environmental Impact  
Report, Project No R2004-00559-(5)**

**Dated 10/22/14**

Our Val Verde Civic Association has come up with questions and comments to the Chiquita Canyon Expansion, Project R 2004-00559-(5). Comments are provided below and grouped in sections.

General comments:

The VVCA has a contract with the Chiquita Canyon Landfill. This contract was signed in 1997 by our VVCA rep and CCL. Two items are unresolved and we request that you put the project on hold until these issues are resolved. The two items are the acceptance of sludge by CCL. Our contract clearly states that CCL is not allowed to accept sludge. As you are aware, they received a NOV from your agency, due to their acceptance of sludge. This sludge is still on site and we want them to remove it.

59-1

The second issue is the end date of the contract. The contract states that CCL will close when they reach 23 M tons or on November 24, 2019, whichever comes first. By their attempt to expand their site, we see this as a breach of contract. We ask that you take these two items into consideration before allowing the project to proceed.

59-2

1.1.1 Historical Waste Quantities

- Table 1-1 shows the tonnage per year. Since the CUP allows for 6K tons per day, we would like to see the daily intake for years when 1.326M tons/yr or more were taken in, to verify that the landfill has been in compliance with their CUP.
- Table 1-2 shows the tonnage per month for Disposal, Diverted for Beneficial Use and Total Received. Since the Total Received waste is what is truly received at the landfill, we request that this amount be used in the calculation of the daily tonnage limit.

59-3

1.1.2 Existing Conditional Use Permit

- The CUP allows for a total of 23 M tons of trash or until November 24, 2019. The capacity shall be reached between 2015-16. Due to the years of poor budgeting, CCL will reach capacity early. This poor management of the landfill tonnage limits has created a burden to the local community and the county. This DEIR does not have a section relating to proper capacity control. Please provide a section to describe how the landfill has planned and budgeted. Please provide detailed annual tonnage plans, 3 year plans, 5 year plans and long term plans.

59-4

1.2 Project Purpose and Objectives

- One of the objectives is to provide environmentally sound, safe and cost effective disposal capacity. We ask that this objective be used as a criteria for responding to the comments provided below.

59-5

1.4.2 Public Scoping Process

- The closest community to CCL is Val Verde. The population of Val Verde has a large proportion of Spanish speaking residents. CCL has not properly noticed the Spanish speaking residents of the scoping meeting. Please show how this is not a violation of their rights. Please explain why CCL hand delivered fliers to residents in both English and Spanish, just prior to a VVCA meeting in September, 2014.

59-6

1.4.4 Circulation of the DEIR

- The closest community to CCL is Val Verde. The population of Val Verde has a large proportion of Spanish speaking residents. CCL has not properly noticed the Spanish speaking residents of the DEIR process and DEIR meetings. Please show how this is not a violation of their rights. Please explain why CCL hand delivered fliers to residents in both English and Spanish, just prior to a VVCA meeting in September, 2014.

59-7

1.5.1 Regulatory Compliance – Framework for Class III Landfills

- The CUP requires CCL to turn away sludge, as it is not allowed. On more than one occasion, CCL has bid on accepting sludge and on at least one occasion, they have accepted sludge. The regulatory agency did not catch this violation and was made aware of it by a resident of the community. Since CCL has shown a lack of respect for following this condition of the CUP, we request that sludge continue to be a banned item.
- The community is concerned about other potentially dangerous materials being accepted at CCL. Since CCL has been caught accepting sludge and then trying to cover up the evidence, there is little trust by the community. Due to this, we request that CCL not be allowed to accept any material which comes from a toxic or radioactive site, such as Rocketdyne.

59-8

- IWMA requires counties to secure long-term (15 years) disposal capacity for waste. Due to this requirement, we request that expansion be limited to this term (15 years).

59-9

1.5.3 County of Los Angeles Approvals

- Los Angeles County Department of Public Works requires a permit for Leachate and Condensate. Since CCL has not been forthcoming about accepting sludge, we request that the leachate be tested. The community believes that testing of the leachate can be used to determine if banned materials have been accepted by CCL and if additional monitoring of the materials accepted CCL will be required.

59-10

2.2.2 Lateral Extension of the Waste Footprint and Increased Maximum Elevation

- CCL has had too many violations and odor complaints from regulatory agencies. The SCAQMD, Cal Recycle, LEA and CIWMB have given notices and violations on the following dates from 2006 to 2013: 2/17/06, 2/24/06, 4/13/06, 4/19/06, 7/17/06, 7/24/06, 9/21/06, 12/7/06, 3/29/07, 4/17/07, 6/11/07, 8/2/07, 9/13/07, 10/15/07, 3/20/08, 5/19/08, 1/15/09, 7/11/09, 7/13/09, 9/22/09, 2/11/10, 4/13/10, 6/24/10, 7/24/10, 8/11/10, 1/12/11, 4/17/12, 5/10/12, 6/6/12, 7/13/12, 7/20/12, 7/21/13, 11/12/13. Due to the large number of problems and the huge risks (one violation was for 45% methane levels, when the state limit is 5%), we request that the maximum height be left at the level of the current CUP. A higher elevation will make it easier for dangerous gasses and odors to come over the ridge and wind up in Val Verde.

59-11

2.2.3 Disposal Rate and Volume

- The current CUP will expire at 23M tons or November 24, 2019. CCL has done a poor job of managing their existing permit and will run out of capacity early. The current management is responsible for the poor planning, therefore we request that CCL be limited to an amount equal to the average tonnage from the last 5 years. This request is also based on the problems stated in section 2.2.2 and the fact that they blatantly disregarded the CUP condition of no sludge, then later attempted to cover it up.
- The comment in section 1.5.1 states that the IWMA requires a 15 year disposal plan, so we request that CCL is limited to a maximum of 15 years.

59-12

2.2.4 Wastes to Be Received

- The existing CUP allows for CCL to accept waste that a Class III landfill is allowed to, less sludge. The community of Val Verde is concerned about the health effects from accepting sludge. CCL accepted sludge from Cater Water Treatment Facility from 2011 to 2012. This sludge was illegally accepted per the CUP and CCL has not removed this unwanted material. Sludge is super concentrated waste, therefore any material in the pre-treated water will have substantially higher concentrations in the sludge. The Cater Water Treatment Facility sludge is suspected to have arsenic. CCL has made public claims that they tested the sludge, prior to allowing it to be brought into their site. We request that the test results of this sludge be made available to the community.
- Due to CCL making bids for sludge and accepting sludge, we request that they are not allowed to accept sludge or sludge components. Sludge is dangerous and puts the community at risk. Since the nearest home is far too close to CCL, sludge can be a health risk to the residents.
- Due to the history of CCL violating their CUP and the numerous complaints, we request CCL to be banned from accepting materials from a toxic waste site or from a radioactive site. In addition, CCL has misled the community regarding both the illegal sludge acceptance and also their acceptance of radioactive waste. These deceptive practices leave the community to believe that CCL needs to be limited to certain material only.

59-13

## 2.2.5 Material to Be Diverted from Waste Disposal

- CCL has been allowed to accept these materials for daily cover. The residents of Val Verde have had numerous complaints about odors in the evening and early morning. CCL uses daily cover to keep odors from leaking into the air, which then can enter the community. Due to the large number of odor complaints and the nuisance to the residents, we request that only clean soil and sand are allowed for daily cover.

59-14

### 2.2.7.4 Hours of Operation

- Due to the proximity to residents, we request that CCL be allowed to accept trash only during normal business hours 8 am to 5 pm. Since the tonnage capacity in Section 1.1.1 is 1.56 M tons/year and based on 6 M tons/day, that calculates to 260 days of operation. With 52 weeks in a year, this calculates to 5 days/week. Using these calculations, we request that CCL be allowed to operate 5 days/week and to be allowed to operate during normal business hours of 8 am to 5 pm, so it will have a reasonable impact to the residents.

59-15

### 2.2.7.5 Personnel

- The community of Val Verde is economically challenged and has the lowest per capita income in the Santa Clarita Valley. Unemployment rates are higher than normal, therefore, we request that CCL be required to employ at least 50% of their workforce from Val Verde.

59-16

### 2.2.7.7 Disposal and Cover Procedures

- This document specifies that no changes to cover procedures will occur. This is not acceptable, as the odor problems in Val Verde occur on almost a daily basis. The odor problems are typically much worse in the evening until early morning. The daily cover is the problem and the methods CCL is using does not work. Changes are required and we would like CCL to follow the procedures and use the same materials as the best county or city run landfills.

59-17

### 2.2.7.8 Sewage and Water

- Los Angeles County and the Santa Clarita Valley are in a severe drought. Water is a precious resource and the quantity of water CCL uses could be allocated to residential use. CCL states that they will use water from Valencia Water Company's system for construction and routine operation. The CUP has an end date of November 24, 2019 or at 23 M tons. If the Dept of Regional Planning accepts this project, the water needs are considered new and CCL needs to provide it's own water, or purchase water rights. These rules are requirements for other large land use projects, such as housing developments, therefore CCL should follow. Please have CCL purchase water rights and give the water to Castaic Water Agency or import water from outside the community.

59-18

#### 2.2.7.9 Traffic

- The Newhall Ranch Development will add 21,000 homes to the area. In addition, developments such as Hunt Williams Residential Property, Tapia Ranch and the Palmer property will bring an additional 1,300 homes to the area. Table 2-3 shows that 1,023 vehicles/day will be travelling to or from CCL. Since the CUP has an end date, which means that these 1,023 vehicles/day will be additional vehicles on our roads. Table 2-4 shows a peak potential impact of 3,490 additional vehicles/day. Please provide a detailed study on the impact of these additional vehicles to our existing roadways, as they were not included in Appendix G. Please provide a detailed study on the increase in pollution from these vehicles and the additional risk of cancer and illness, as the additional traffic from these homes were not factored into the study in Appendix H. As we know, these additional homes will bring cars to our roads and freeways. Adding the traffic from CCL, will put an additional burden on the traffic. Please provide a detailed study on the impact to commuters, delivery vehicles, mail trucks and business owners.

59-19

#### 2.2.8.2 Liner System

- Please provide a report on the new liner systems available. The existing liner system was severely damaged in the 1994 Northridge Earthquake. Please comment on the repair procedure that was done to repair the damage from the earthquake. Please comment on how this can be prevented when another earthquake of this magnitude occurs. Please provide a report on the improvements in liner systems, since the last CUP was approved. Please provide information regarding the added safety of the better liner systems. Please provide the reason why CCL chooses not use a better liner system.

59-20

#### 2.2.9.3 Leachate Monitoring

- Due to the concern that CCL has accepted materials which are not allowed, per the CUP, we request that leachate testing be mandatory. We request that the leachate testing be used to determine what materials have been accepted by CCL.

59-21

#### 2.2.9.5 Air and Landfill Gas Monitoring

- The residents of Val Verde have had numerous complaints about odors from CCL. A health study was also implemented by the community and the results show that there is a higher incidence of health ailments in Val Verde. Due to the health ailments and odor problems, we request that an independent agency regularly test the air in Val Verde, particularly in the area closest to CCL. We also request that a baseline test is also run at the same time, to verify that the air quality is lower near CCL.
- If the test results show that the air quality is lower near CCL, we request that a health fund be created by CCL. We envision this fund to be used for running tests, providing medication, providing filtration machines in the homes near CCL and also to set up a substantial fund to pay for long term health treatment.

59-22

#### 2.2.9.6 Nuisance and Health Hazard Monitoring

- Due to the impact to residents, regarding odor problems from CCL, we request that the existing daily cover procedures are inadequate and need to be improved. Since the majority of the odor problems occur in the evening until early morning, it can be determined that the problem stems from poor daily cover procedures. We request that the only material used for daily cover is either clean dirt or sand. We also request that the procedures used mimic those used at the best county or city run landfills.
- A larger than normal number of respiratory ailments arise in Val Verde. It has been determined that one of the causes is particulate matter. Due to the proximity of CCL to Val Verde, we feel that CCL must do a better job controlling the particulate matter leaving the site. We request that a detailed study be done, regarding the particulate matter leaving CCL. We ask that CCL test the exhaust gasses from the incinerator and turbine to determine the chemicals present and the amount of particulate matter emitted. We request a detailed study be done, regarding particulate matter and gasses – and how they affect the health of individuals and the increased chance of respiratory ailments and cancer.
- Dust Control: Please show how the proposed dust control is the most effective. Please list all the health hazards due to dust generated at a landfill. Please show how dust generated from the site can enter the community of Val Verde. Please show the correlation between dust being breathed in and respiratory illness.

59-23

- Litter: Please show how the number of employees will be sufficient to clean up trash on HWY 126 and Chiquito Canyon Road. Please show a work schedule for these employees. Please show how you determined the manpower requirement.

59-24

#### 2.3 Landfill Closure and Post-Closure

- Please clarify the post-closure procedure for CCL. Please provide detailed information regarding damage from an earthquake and flooding. Please show how you determined that the amount set aside will be sufficient to fulfill the requirements of closure
- Please clarify how CCL will maintain each section of the site after closure
- Please clarify how CCL will protect the environment in areas of the site, where there is no liner
- Please clarify how CCL will protect the environment in areas where the liner will rip or has torn.

59-25

#### 5.7.2.2 Seismic-Related Ground Failure and Landslides:

- Please show how the engineering qualities of the onsite soils used in the slope stability analysis are realistic.
- Please show how you determined that the cross bedded values of the Saugus Formation and the case studies you used for your research.
- Please show how you determined that these soils (being poorly graded), have the capability to attain shear strength values as those listed in the laboratory analysis.

59-26

- Research of case history in the Santa Clarita area did not show any documented cross bedded shear values of the Saugus Formation as high. Can you elaborate on where you found this data? Please show how you verified your data as accurate and realistic.
- Our community is concerned that the use of the unverified and unrealistic values to increase the factor of safety for the stability analysis, thereby creating a false stability analysis, whereas a potentially unstable one may exist.
- No documentation has been provided for our review with respect to the seismic design for the proposed unit. We request that any Joint Technical Documents (JTD) regarding seismic design of the proposed unit be made available for a peer review by the VVCA prior to any approval of the EIR. We request that any seismic analysis regarding the determination of a seismic factor of safety for the proposed unit, the Dynamic Analysis of the proposed unit and all related geotechnical parameters i.e. peak ground acceleration and related engineering characteristics be made available to the VVCA for peer review prior to any approval of the EIR. We request that the stability analysis of the proposed unit (not cut slope stability by RTF) and all related geotechnical parameters be made available to the VVCA for peer review prior to any EIR.

59-26  
cont'd

#### 15.5.2 Potential Visibility of the Proposed Project and Selection of Key Observation Points

- North and Northwest of Chiquita Canyon Landfill: CCL states that the site will not be visible from the residential area of Val Verde. At our VVCA meeting, the CCL rep publicly stated that the expansion will not be visible from Val Verde. Due to the lack of trust the community has, we request that CCL be held to the requirement that the site will not be visible from any of the residences in Val Verde.
- This DEIR does not have a section regarding visual impacts on Del Valle Road. Since this is one of the major roads used by residents of Val Verde, we request that a study be done. This is a beautiful stretch of road and if the study shows that there is an impact, we would like CCL to be banned from damaging the view along this road.

59-27

#### 15.9 Cumulative Impacts

- Figure 15-11. The after simulation is not correct. This intersection will be an overpass and will be situated South of the current intersection. Please provide accurate simulation photos of this intersection.
- Figure 15-12. The after simulation shows a repaired sign for the Travel Village. Please explain why this was repaired and if CCL will be repairing it. Please explain the rust removal procedure for the sign and what type of paint will be used to keep the rust away. Please verify the height of the simulated buildings. Please verify the shape and dimensions of the simulated buildings.

59-28

#### 16.4.1 Demographics Characteristics

- Table 16-2 shows the population in Val Verde is 61.1% Hispanic. Based on these demographics, why wasn't the Scoping Meeting noticed in Spanish? Based on these demographics, why wasn't there a Spanish interpreter at the Scoping Meeting?

59-29

- Regarding the high Hispanic presence in Val Verde, why wasn't the DEIR provided in Spanish? Why wasn't a Spanish interpreter provided at the VVCA, CATC and CATC Land Use Hearing, where the CCL Expansion was presented? Since the DEIR has been in process for months, if not years, it was known that Val Verde has a high percentage of Hispanic residents.

59-29  
cont'd

16.5.2.1 Environmental Justice

- The second criteria for Environmental Justice compares the local area to the general population of the area. Since the general area is Santa Clarita Valley, we request that tables be generated comparing Santa Clarita Valley to Val Verde. Since there are other landfills in Los Angeles County, we feel that a better comparison is to use the Santa Clarita Valley.
- If a larger general area is desired, much of Ventura County should be considered. The majority of Ventura County is much closer to CCL than distant parts of Los Angeles County. Please recalculate the population in the tables and use these new numbers to determine Environmental Justice.
- Using either of the two above methods, it is expected that an Environmental Justice case exists. Please explain how this will be remedied.

59-30

17.2 Unavoidable Impacts of the Project

- Particulate Matter is listed as in this section. We request that CCL look into purchasing water rights, which will allow them to do a better job keeping this material down. Due to the large number of residents who have respiratory ailments, increasing PM will have a negative effect on them. Per 1.2 above, the health of the residents is one of the major goals. If CCL purchases water rights, they will be allowed to use more water. This water can be used for the reduction of PM.

59-31

17.4.2 Evaluation

- Please explain the requirement of residential property developers in regard to waste disposal. If this is a requirement of the developer, please explain how many new homes can be built, because there will be waste dumping facilities.

59-32

Appendix A

- Please explain all the Potentially Significant Impacts in the first 19 sections (up to page 42 of the appendix) and how they have been answered. Please explain why each of these impacts is considered acceptable under this DEIR.
- Please show how each of the comments or questions in this Appendix have been answered. Please show how the impacts have been mitigated or if not, how they are still impacts.
- Cal Recycle Letter Dated 12/27/11: Please describe how each comment or question has been answered. Please describe each one at a time.
- Castaic Area Town Council comments dated 12-6-12: Please describe how each comment or question has been answered. Please do this one item at a time.

59-33

- Marc Salzarulo’s comments dated 2/11/12: Please describe how each comments or question has been answered. Please describe each one at a time.
- Nancy Carder’s comments dated 2/10/12: Please describe how each comments or question has been answered. Please describe each one at a time.

59-33  
cont'd

Appendix E1 Biota Report

- Table 1-1 references seven surveys which are over 12 years old. Seven of the reports were made between 2004 and 2009. We request that newer surveys are taken and used in the analysis.

59-34

Over the past years, CCL has had poor relations with the community of Val Verde. Residents have complained about being insulted by CCL reps when they come to evaluate odor complaints. It is never the fault of CCL and insults such as dead animals, stinky trash cans, septic tanks and even smelly flowers are made. CCL has also made false statements to the residents regarding sludge and radioactive waste. Finally, CCL reps have called certain residents names and mock them in public. Please explain the method planned to repair the damage to the relationship with the community. Please explain how CCL will change the way they treat the residents. Please explain the change in management required to do this. Please explain what CCL will do to make the community feel better about the business.

59-35

The final comment deals with the ownership of CCL and how they will be able to cover their liability if a catastrophe occurs, or if they wind up with large medical lawsuits. Please explain the current ownership position and the entities involved. Please explain which company is liable for damages. Please describe the liability process and if an entity will be able to avoid liability. Describe the fund to pay for liabilities if CCL goes bankrupt. Describe the annual payment to this fund. State the location of this money and if it safely invested.

59-36

Thank you for your assistance.

Greg Kimura, President VVCA

# Letter No. 59

Greg Kimura  
Val Verde Civic Association

## Response to Comment No. 59-1

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance. Also see Topical Response #29a for a discussion of Wastes to be Disposed.

## Response to Comment No. 59-2

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

## Response to Comment No. 59-3

Please see Topical Response #8 for a discussion of Disposal Rate and Capacity. Also see Topical Response #4 for a discussion of compliance with the current Conditional Use Permit (CUP).

## Response to Comment No. 59-4

Please see Topical Response #8 for a discussion of Disposal Rate and Capacity.

## Response to Comment No. 59-5

Comment noted.

## Response to Comment No. 59-6

Please see Topical Response #22, Public Scoping and Public Outreach.

## Response to Comment No. 59-7

Please see Topical Response #22, Public Scoping and Public Outreach.

## Response to Comment No. 59-8

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance. Also see Topical Response #29a for a discussion of Wastes to be Disposed.

## Response to Comment No. 59-9

Please see Topical Response #8 for a discussion of Disposal Rate and Capacity, and Topical Response #19 for a discussion of Project Need.

## Response to Comment No. 59-10

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance, including a discussion of sludge.

## Response to Comment No. 59-11

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of potential odor impacts. Please also see Topical Response #17, Odor.

## Response to Comment No. 59-12

Please see Topical Response #8 for a discussion of Disposal Rate and Capacity. Also see Topical Response #4 for a discussion of Conditional Use Permit Compliance.

## Response to Comment No. 59-13

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance. Also see Topical Response #29a for a discussion of Wastes to be Disposed.

## Response to Comment No. 59-14

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of potential odor impacts. Please also see Topical Response #17, Odor.

## Response to Comment No. 59-15

Comment noted. Proposed hours of operation are discussed in Chapter 2, Project Description, of the Final EIR.

## Response to Comment No. 59-16

Please see Chapter 16, Environmental Justice and Socioeconomics, of the Final EIR, as well as Topical Response #9, Environmental Justice.

## Response to Comment No. 59-17

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of potential odor impacts. Please also see Topical Response #17, Odor.

## Response to Comment No. 59-18

Please see Topical Response #23c, Water Supply, for a discussion of the Water Supply Assessment. An updated Water Supply Assessment is included in Appendix J of the Final EIR.

## Response to Comment No. 59-19

Please see Topical Response #25 for a discussion of Traffic. Please also see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

## Response to Comment No. 59-20

Please see Topical Response #11 for a discussion of Geologic Hazards, as well as Topical Response #14 for a discussion of the Landfill Liner System.

With regard to the potential for liner leaks, please see Topical Response #10 for a discussion of Environmental Monitoring, including groundwater monitoring.

## Response to Comment No. 59-21

Please see Topical Response #10c for a discussion of Leachate Monitoring.

## Response to Comment No. 59-22

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of potential odor impacts. Please also see Topical Response #17, Odor, and Topical Response #21, Public Health.

## Response to Comment No. 59-23

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of potential odor impacts. Please also see Topical Response #17, Odor, and Topical Response #21, Public Health.

BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the Mitigation Monitoring and Reporting Plan (MMRP) included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP.

## Response to Comment No. 59-24

Litter management is addressed in Section 2.2.8.8, Nuisance and Health Hazard Monitoring, of the Final EIR. The Lead Agency, Los Angeles Department of Regional Planning, is responsible for enforcement of compliance with the Proposed Project, including compliance issues related to litter.

## Response to Comment No. 59-25

As described in Section 2.3 of the EIR, landfill closure and post-closure will be performed in a manner consistent with a final closure plan to be prepared for the site that requires the approval of the Regional Water Quality Control Board, the Local Enforcement Agency, and the California Department of Resources Recycling and Recovery (CalRecycle). Please also see Topical Response #14, Landfill Liner System.

## Response to Comment No. 59-26

Please see Topical Response #11 for a discussion of Geologic Hazards.

## Response to Comment No. 59-27

Original Draft EIR Chapter 15, Visual Resources, page 15-4 states:

“Character Photo 3 (Figure 15-10) was established north of CCL, at the intersection of Hasley Canyon Road and Del Valle Road, looking south-southwest toward CCL. Like Character Photos 1 and 2, steep slopes and vegetative screening between this viewpoint and CCL preclude views of the existing and expanded landfill from this area.”

A detailed evaluation was undertaken to determine from which areas surrounding CCL views of the Proposed Project would be possible. The significant ridgeline along CCL’s northern boundary (greater than 1,600 feet above mean sea level [msl] in most locations) prevents views from areas north of the landfill, particularly given that the Proposed Project would have a maximum elevation of 1,573 feet above msl.

Please also see the Visual Supplement included with the Partially Recirculated Draft EIR and Topical Response #27, Visual Resources.

## Response to Comment No. 59-28

The baseline photos used for visual simulations in the Original Draft EIR Chapter 15, Visual Resources, are of existing conditions approximately at the time the Notice of Preparation was released for the Proposed Project (November 2011). Given that the overpass in the comment was not yet constructed, it was not feasible to provide a view of the Proposed Project from an elevated vantage point. However, please see the Visual Supplement to the Partially Recirculated Draft EIR, which includes an elevated view of CCL from approximately the same location as the prior intersection of State Route 126 and Commerce Center Drive.

The "after" simulation for Figure 15-11 depicts a "repaired" sign for Travel Village because Travel Village repaired their sign after the existing condition photograph was taken. CCL did not repair the sign and will not be repairing it in the future. However, the sign, and the location of the Travel Village Key Observation Point, no longer exist. Please see the Visual Supplement to the Partially Recirculated Draft EIR for an updated view of CCL from Travel Village.

The shape and dimensions of the buildings in the simulation are based on information provided by Newhall Land and Farming Company.

Please also see the Visual Supplement included with the Partially Recirculated Draft EIR and Topical Response #27, Visual Resources.

### Response to Comment No. 59-29

Please see Topical Response #22, Public Scoping and Public Outreach.

### Response to Comment No. 59-30

Please see Topical Response #9, Environmental Justice.

### Response to Comment No. 59-31

BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the Mitigation Monitoring and Reporting Plan (MMRP) included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the South Coast Air Quality Management District (SCAQMD), who will oversee compliance with permit conditions and dust control plans.

Please also see Appendix J of the Final EIR for an updated Water Supply Assessment for the Proposed Project, and Topical Response #21, Public Health.

### Response to Comment No. 59-32

The *California Environmental Quality Act* does not require the environmental analysis for a proposed project to provide a detailed explanation of the requirements of other projects or developments. Potential growth-inducing impacts of the Proposed Project are addressed in Chapter 17 of the Final EIR.

### Response to Comment No. 59-33

The comments received on the Notice of Preparation were considered by the Lead Agency regarding the breadth and scope of the environmental analysis included in the Original Draft EIR. The Lead Agency, Los Angeles Department of Regional Planning, provided thorough review of the Original Draft EIR and the Partially Recirculated Draft EIR prior to the release of both documents for public review. This also included detailed review by other County agencies. The Lead Agency is satisfied that potentially significant environmental impacts of the Proposed Project have been addressed in the Original Draft EIR and the Partially Recirculated Draft EIR.

### Response to Comment No. 59-34

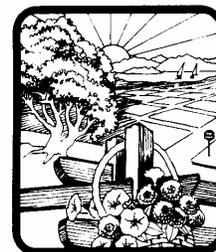
Please see revised Chapter 8, Biological Resources, of the Partially Recirculated Draft EIR, as well as Topical Response #2, Biological Resources.

### Response to Comment No. 59-35

This comment is not related to an environmental issue. Please also see Topical Response #22, Public Scoping and Public Outreach.

## Response to Comment No. 59-36

Please see Section 2.3.2.2 of the Final EIR for a discussion of financial assurance.



**SCOPE**  
**Santa Clarita Organization for Planning and the Environment**  
TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY  
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY  
POST OFFICE BOX 1182, SANTA CLARITA, CA 91386

10-22-14

Attn: Ms. Iris Chi  
Zoning Permits Section Rm 1345  
Los Angeles County Dept of Regional Planning  
320 W. Temple St.  
Los Angeles CA 90012

**Re: Chiquita Canyon Landfill Expansion Draft Environmental Impact Report  
Project No. R2004-00559-(5) SCH No. 2005081071**

Dear Ms Chi:

SCOPE is a conservation and planning organization founded in 1987 to focus on the Santa Clarita Valley and the watershed of the Santa Clara River. We provided extensive comments on the former Chiquita Canyon Landfill expansion process that began in 1995. We also submitted comments on the NOP and attended the hearing examiner meeting held on July 31<sup>st</sup>, 2014 for the current project.

This comment letter is timely filed on Oct. 23, 2014. No time of day was indicated on the Notice of the comment period. We appreciate the County's grant of a time extension to Oct. 23<sup>rd</sup>.

We remain concerned about the affects of the landfill on water and air quality in the Santa Clarita Valley as well as traffic issues arising from the substantial proposed increase in truck traffic that will be generated if the requested capacity increases are allowed. We believe that this proposal will discourage the County's efforts to reduce waste generation and promote recycling.

**Hearing Examiner Process**

We wish to begin this letter by expressing our concern over the Hearing Examiner process. These comments were also made at the time of the July 31<sup>st</sup> meeting and before the Planning Commission during the public comment portion of the agenda on Wednesday Aug 6<sup>th</sup>, 2014. While we understand and support the County's efforts to hold a hearing in or near to the project location, the absence of any of the decision makers from participation at the hearing negates this goal. It has been represented to us that the Commissioners will read the transcript of the hearing, but there is no assurance that this will actually occur. Additionally, the Commission will now lack the vital understanding of community concerns that is communicated through intonation and facial expressions. The Commissioners will also be unable to ask the commenter any questions regarding his or her testimony. Therefore, while this procedure streamlines the process for the developer and the County Planning Dept., it gives short shrift to the community's ability to communicate its concerns.

We note that during the hearing process for the Elsmere Landfill, the County Planning Commission attended the local hearing held at the Valencia High School gym. Why is the Val Verde and Castaic community being treated differently?

60-1  
cont'd

It should also be noted that some residents in the local communities do not speak or read English well. It is important that they be included in this process and also have the opportunity to comment. Val Verde is a historic African American community. It is important to ensure that all these groups are aware of and included in the process. This will require more time.

This landfill is permitted to operate either until November 2019 or until it reaches permitted capacity. While most of the negative impacts of this project will be suffered by the residents of the Santa Clarita Valley and in particular, the community of Val Verde, as much as 66% of the trash comes from transfer stations outside the Santa Clarita Valley. In negotiations over the last expansion approval, the community was promised and given a written agreement by Newhall Land and Farming that the Landfill would not be expanded. It is unfortunate that this company, though no longer the owner, will not stand by its word and help to ensure the closure of this facility.

60-2

### **Impacts to Traffic and Greenhouse Gases**

The methodology for ascertaining miles traveled in the Transportation, Air Quality and Greenhouse Gas sections of the DEIR is as follows:

“It was assumed that service trucks would travel 5 miles per day onsite, that waste trucks would travel 6 miles per day offsite and 4 miles per day onsite with an idling time of 3.5 minutes, and In accordance with CARB interim thresholds for GHG emissions, the equipment exhaust will not be included in the evaluation of the operational emissions impact. The Proposed Project incorporates the CARB interim performance standards for construction and transportation.” Page 12-5

After spending several hours trying to ascertain why offsite trash haul truck VMT were so low, we finally found the following in a foot note in appendix H (page 3):

60-3

<sup>3</sup> Total truck travel distance is only based on the distance from the interstate because the truck would be operating within the SCAQMD without the project.

This choice of methodology affects the calculation of air quality emissions, traffic impacts and greenhouse gas calculations. It appears that the DEIR has intentionally underestimated the vehicle miles traveled by offsite trash haul trucks including large diesel tractor trailers in order to downplay the impact of these VMT. Such critical information does not belong hidden in a footnote in an appendix to the EIR. It must be disclosed prominently as a crucial assumption on which DEIR data calculations are based.<sup>1</sup>

<sup>1</sup> “It is buried in an appendix. . . . It is not enough for the EIR simply to contain information submitted by the public and experts. Problems raised by the public and responsible experts require a good faith reasoned analysis in response. (*Cleary v. County of Stanislaus* (1981) 118 Cal. App. 3d 348, 357 [173 Cal. Rptr. 390].) The requirement of a detailed analysis in response ensures that stubborn problems or serious criticism are not “swept under the rug.” (*Ibid.*)”, *SCOPE v. County of Los Angeles*, 106 Cal. App. 4th 715; 131 Cal. Rptr. 2d 186; 2003 Cal. App. LEXIS 291; 2003 Cal. Daily Op. Service 1767; 2003 Daily Journal DAR 2219

In addition to inaccurately minimizing impacts to air quality and greenhouse gas generation, calculating traffic impacts by trash haul trucks only for the distance to and from the I-5 exit and the landfill conveniently eliminates the need to discuss any impacts to the freeway system by heavy truck travel. The Project Proponent then of course also neglects to discuss any mitigation that might be warranted from such impacts.

60-4

The Project Proponent could have readily calculated off site truck impacts. The DEIR discloses that 66% of the trash is coming from transfer stations<sup>2</sup> and information as to where and how much tonnage each transfer station is supplying is available from gate receipt data and supplied to CalRecycle. The vehicle miles travel (VMT) should have been accurately calculated with this information. The excuse used in the DEIR to exclude these vehicle miles and an accurate calculation was that those vehicles might go somewhere else anyway if they were not using the Chiquita landfill. While this may or may not be the case (perhaps the cities would instead provide greater waste reduction, diversion and recycling), such an argument does *not* remove the fact that the VMT from these transfer stations are now and in the future, a part of the Chiquita Canyon Expansion proposal and the traffic, air and GHG impacts created by their VMT and emissions should have been disclosed in the DEIR.

60-5

We believe that this assumption and the failure to disclose it in the body of the EIR is a serious omission requiring recirculation of the EIR.

Although the DEIR states otherwise, we concur with County Planning that traffic is a significant impact that must be mitigated. While some improvements built at public expense (i.e., the 126 interchange) are in process, the owner of Chiquita Canyon Landfill should be required to contribute to the Westside Bridge and Thoroughfare District to mitigate local impacts and to 1-5 mitigation funds for truck lanes to mitigate for freeway impacts.

**We concur with and hereby incorporate by reference, the comments of the Sierra Club as they relate to greenhouse gas generation and the inadequacy of the proposed mitigation measures.**

### **Air Quality**

The health impacts and regional air quality impacts from heavy truck activities are well documented. Diesel particulate matter (“DPM”) is known to present the greatest health risks to Californians of all listed toxic air contaminants (“TACs”) identified by the California Air Resources Board (“CARB”).<sup>3</sup> Numerous studies have shown adverse impacts from DPM and NO<sub>x</sub> (nitrogen oxides), including respiratory disease, cardiovascular mortality, cancer, and reproductive effects as well as increased smog and water contamination. CARB has determined that diesel exhaust is responsible for over 70% of the health risk from breathing air within our region, the South Coast Air Basin (“SCAB”).<sup>4</sup> Given the location of this proposed project amidst polluted air in the region, and the close proximity to sensitive receptors such as schools, the County cannot take lightly the decision to allow increased truck traffic for years to come.

60-6

Section 11.3.3.1 Attainment Status - The area where the where the project is located is designated as nonattainment for the state ozone, coarse particulates (PM10), fine particulates

<sup>2</sup> DEIR page, 1-2, Table 1-2

<sup>3</sup> CARB, *Emissions Reduction Plan for Ports and Goods Movement in California*, 7 (2006) (hereinafter “ERP”).

<sup>4</sup> ERP, 7.

(PM2.5), Nitrogen Dioxide 2 and lead standards. The area is designated as nonattainment for the federal 8-hour ozone, PM2.5, and lead standards.

60-6  
cont'd

### Methodology

The DEIR states: “CO<sub>2</sub> emissions from off-road diesel equipment exhaust were estimated using SCAQMD OFFROAD 2007 emission factors. Though CARB has released an updated version of the OFFROAD model, OFFROAD 2011, it was not used for this analysis as it provides inventory level emissions rather than equipment-specific emission factors. CO<sub>2</sub> and CH<sub>4</sub> emissions from on-road vehicle exhaust were estimated using EMFAC2011 average emission factors for the SCAQMD.” (page 12-5)

60-7

We assert that this modeling choice may have resulted in inaccurate estimation and/or underestimation of greenhouse gas emissions for on site and off-site mobile sources because the Project Proponent cannot know the emissions of vehicles it does not yet own or that other operate. Further, the DEIR preparer fails to describe the limitations of the model as required by CEQA.

As discussed in the section addressing traffic and GHG impacts, the use of only the distance from the I-5 exit to the landfill and back (total 6 miles) to calculate VMT substantially underestimates the emissions produced by trash haul trucks, including diesel tractor trailers. The VTM must be re-calculated to accurately disclose total mileage for these trucks. When this information is accurately disclosed, we believe this project will be above the level of significance for vehicle emissions.

60-8

Appendix H Air Quality -H-1 Methodology indicates that the emission calculation selected only three years for further analysis, 2016, the first year of cell construction, 2021 and 2032, landfill closer date. Since substantial ramping up of the project is proposed between 2021 and 2032, this methodology may substantially understate emissions.

60-9

As described in Section 11.2 and Appendix F, vehicle exhaust emissions from waste trucks were calculated and included in the air dispersion modeling and HRA, but were not included in the maximum daily operational totals per the SCAQMD *CEQA Air Quality Handbook* (SCAQMD, 1993). Since clean air act rules require inclusion of all emissions, we do not believe that exclusion of haul trucks is an acceptable method for determining air quality impacts. This is particularly obvious since the DEIR came to the conclusion that “The Proposed Project would result in a net reduction in emissions from waste trucks when compared to the No Project Alternative.” How could a conclusion such as this be reached other than being a result of using a flawed methodology?

60-10

Biogenic landfill gas air quality impacts were apparently calculated using gas burn off by two flares, but according to Appendix H, the second flare will not be installed until 2032. Therefore the calculations underestimate capture of landfill gas and air quality emissions.

60-11

When air emissions are re-calculated using more accurate methodology criteria, we believe that the statement “**Impact AQ-5: Operation of the Proposed Project would generate impacts that would not exceed the criteria pollutant significance thresholds used by SCAQMD to determine significance of operational emissions. Therefore, operational-related impacts would be less than significant.**” will no longer be accurate, and that these impacts will be found to be significant. The Project Proponent must provide mitigation measures to address these significant impacts.

60-12

**Fugitive Dust**

According to section 11.4.3.2 of the DEIR, the Proposed Project construction and operations will be subject to SCAQMD Regulations Rule 403 (Fugitive Dust). Additional requirements for large operations with 50 acres or more of disturbed surface area or with a daily earth-moving or throughput volume of 5,000 cubic yards are listed Rule 403 Tables 2 and 3. It appears that this rule applies to the proposed landfill expansion, but there is no explanation as to how you will comply. The Proponent must develop a plan and mitigation measures to comply with this rule.

60-13

11.8 Significance After Mitigation - “Implementation of the Project Design Measures would results in less-than-significant impacts associated with air quality” This statement is no longer true because measures for Fugitive Dust Control have been eliminated due to water availability concerns in the project area.

**Water Supply**

We are currently in a drought that has impacted the entire state. The Santa Clarita Valley is currently under drought restriction water rationing. The water information in the DEIR does not accurately describe this situation. Neither does it accurately disclose the spread of the ammonium perchlorate pollution plume that has caused the close of two additional water supply wells, V201 and V205. Both these wells previously supplied water to the Valencia Service area identified as the supplier for this project. Therefore the Water Supply Assessment for this project should be updated and re-issued as it is no longer accurate.

60-14

Further, Castaic Lake water Agency illegally acquired Valencia Water Company by means of an eminent domain proceeding in 2012 without receiving permission to expand their service area from the legislature and as required by their enabling legislation. Certain other statues were also violated so that ownership and regulatory oversight of Valencia Water Co. is no in doubt. Due to these facts, the California Public Utilities Commission revoked Valencia’s Certificate of Public Convenience and Necessity. It is now unclear who has regulatory oversight of this agency and how water service to new customers will be provided. This issue must be addressed before any approvals relying on water service from Valencia Water Co. are granted.

**Water Quality**

The water quality section should have disclosed the potential health risks from the type of VOC’s found in the monitoring wells. These pollutants are all carcinogenic.

Monitoring well contamination charts should have also listed the DLR and MCL levels for all identified contaminants. Persons reading this EIR are not necessarily water quality experts. Without this information in the pollutant charts, the contaminant levels don’t really mean anything and thus fail to inform the public and the decision makers.

60-15

**Conclusion**

This proposed expansion will affect the quality of life the entire Santa Clarita Valley as well as the local community of Val Verde. It is therefore especially important that the DEIR accurately disclose the impacts it will create so that, if approved, they can be mitigated to the fullest extent possible.

60-16

Thank you in advance for your attention to our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Raymond O. Plumb". The signature is fluid and cursive, with the first name being the most prominent.

President

Attachments:

Exhibit 1 – CPUC Valencia Water Company Decision Feb, 26<sup>th</sup>, 2014

ALJ/TOD/dc3

Date of Issuance 3/3/2014

Decision 14-02-041 February 27, 2014

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

In the Matter of the Application of Valencia Water Company(U342W) a Corporation, for an Order Authorizing it to Increase Rates Charged for Water Service in Order to Realize Increased Annual Revenues of \$4,013,000 or 15.97% in a Test Year Beginning January 1, 2014, \$858,000 or 2.93% in a Test Year Beginning January 1, 2015, and \$1,270,000 or 4.23% in an Escalation Year Beginning January 1, 2016, and to Make Further Changes and Additions to Its Tariff for Water Service and for other Items as Requested in this Application.

Application 13-01-003  
(Filed January 2, 2013)

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And Related Matters.

Investigation 13-04-003  
Application 13-01-004  
Case 13-01-005

**DECISION DISMISSING CONSOLIDATED PROCEEDINGS AND DECERTIFYING PUBLIC UTILITY**

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**DECISION DISMISSING CONSOLIDATED PROCEEDINGS AND  
DECERTIFYING PUBLIC UTILITY**

**Summary**

Before the Commission in Application (A.) 03-01-003, et al., are four consolidated proceedings: a general rate case,<sup>1</sup> a cost of capital request,<sup>2</sup> a complaint challenging a transfer of ownership,<sup>3</sup> and our own investigation.<sup>4</sup> This decision dismisses all four proceedings for lack of jurisdiction.

We conclude that applicant and respondent Valencia Water Company (Valencia) is no longer a “private corporation,”<sup>5</sup> by virtue of its acquisition by intervenor and respondent Castaic Lake Water Agency (Agency). Government-owned utilities – i.e., Valencia and Agency – are outside the scope of this Commission’s jurisdiction, save for in limited circumstances not applicable here. Government ownership of a utility deprives this Commission of jurisdiction over that utility, whether the ownership takes the form of a stock acquisition, as here, or the more common form of an asset acquisition.

Accordingly, we hereby: (1) dismiss Valencia’s applications for changes in its rates and its cost of capital, (2) dismiss complainants Santa Clarita Organization for Planning and the Environment, et al.,’s (collectively, SCOPE’s) complaint, (3) close our investigation into Valencia and Agency, and (4) cancel Valencia’s certificate of public convenience and necessity. All pending motions in

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<sup>1</sup> A.13-01-003.

<sup>2</sup> A.13-01-004.

<sup>3</sup> Complaint 13-01-005.

<sup>4</sup> Investigation 13-04-003.

<sup>5</sup> Cal. Const. Art. XII, § 3.

the consolidated proceedings other than Agency's motion to dismiss SCOPE's complaint are denied; this decision is, in part, a grant of Agency's motion to dismiss.

## **1. Factual Background**

### **1.1. An Overview of Valencia Water Company and Castaic Lake Water Agency (Agency)**

#### **1.1.1. Valencia**

Valencia has historically been a Class A water utility subject to the Commission's jurisdiction. Valencia Water Company was established in 1954 to provide retail water service to Newhall Land's Valencia developments. Valencia's service territory covers portions of northern Los Angeles County, including Valencia, Stevenson Ranch, Saugus, Newhall, and Castaic.

In December, 2012, Agency acquired Valencia through a condemnation of all of Valencia's stock.

#### **1.1.2. Agency**

Agency is a public water wholesaler, created by a special act of the California Legislature.<sup>6</sup> It obtains water from the State Water Project for sale on a wholesale basis to Valencia and other retail water purveyors in the Santa Clarita Valley.

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<sup>6</sup> "The Agency was created by the Legislature in the Castaic Lake Water Agency Law. (West's Ann. Wat.Code Appen., § 103-1 et seq., hereinafter, the Agency [Enabling] Act . . . . [T]he Agency is a special district whose purpose, according to section 15 of the Agency Enabling Act, is to "acquire water and water rights . . . and provide, sell, and deliver that water at wholesale only . . . ." )" *Klajic v. Castaic Lake Water Agency* (2001) 90 Cal. App. 4th 987, 991 (*Klajic I*) (citing Agency Enabling Act, § 103-15, p. 500, italics added). The Agency operates in the Santa Clarita Valley in Los Angeles County. *Klajic v. Castaic Lake Water Agency* (2004) 121 Cal. App. 4th 5, 7 (*Klajic II*).

Agency also sells water to retail customers formerly served by Santa Clarita Water Company, which Agency acquired in 2003 through a stock purchase. The history of that acquisition explains much about how Agency structured its acquisition of Valencia, and also about the controversy now before us.

Agency's acquisition of Santa Clarita Water Company is the subject of two appellate court decisions, *Klajic I* and *Klajic II*. As the Court of Appeal explains in the second of those decisions:

Beginning in 1999, the Agency commenced efforts to sell water directly to consumers. It did so by relying on [Water Code] Section 12944.7, subdivision (b). That statute allows a wholesale water agency to sell water at retail "only pursuant to written contract with ... a water company ... subject to regulation by the Public Utilities Commission and serving water at retail within the area in which the consumer is located." ([Water Code] § 12944.7, subd. (b).) Accordingly, the Agency entered into a transaction with [Santa Clarita] Water Company. (*Klajic I, supra*, 90 Cal.App.4th at pp. 991-992.).<sup>7</sup>

The 1999 transaction between Agency and Santa Clarita Water Company "involved two inextricably connected parts. In the contract portion, the Water Company and Agency executed an agreement to permit the Agency to sell water directly to consumers . . . . In the condemnation proceeding, *the Agency concurrently took by eminent domain all of the outstanding stock of the Water Company in order to give the Agency complete control of the Water Company.*"<sup>8</sup> We emphasize

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<sup>7</sup> *Klajic II*, 121 Cal. App. 4th at 8.

<sup>8</sup> *Klajic I*, 90 Cal. App. 4th at 991-92 (emphasis added).

the last portion of the quote, because it describes the identical method that Agency used to acquire Valencia.

Before the transaction to acquire Santa Clarita Water Company closed, the *Klajic* plaintiffs, who were “property owners, residents, and taxpayers located in the area covered by the Agency,”<sup>9</sup> sued to halt the transaction. They argued, among other things, that Water Code § 12944.7(b) authorized Agency to sell at retail only pursuant to a contract with an independent water retailer which is subject to this Commission’s regulation. According to the *Klajic* plaintiffs, there was no such contract between Agency and Santa Clarita Water Company. Santa Clarita Water Company was just Agency’s alter ego, and so any contract between it and Agency was simply an invalid contract with itself.

The *Klajic I* court agreed with the plaintiffs that Agency’s right to sell water at retail was “only pursuant to written contract with” a separate entity that is subject to the Commission’s regulation.<sup>10</sup> The *Klajic I* court remanded the case to the trial court to determine whether, as the result of the challenged transaction, the Water Company continued to exist as an entity separate from the Agency, and continued to be subject to regulation by the Commission, so as to satisfy the requirements of Water Code § 12944.7(b).<sup>11</sup>

The story does not end there. As the *Klajic II* court explains:

While *Klajic I* was pending, the Agency sought a legislative solution. The Agency sponsored Assembly Bill No. 134 (2001-2002 Reg. Sess.). . . . [S]ection 3 of Assembly Bill No. 134 . . . added Section 15.1 to the Agency Enabling Act. Section 15.1

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<sup>9</sup> *Id.*

<sup>10</sup> *Id.* at 997.

<sup>11</sup> *Id.* at 1000-1001.

reads in pertinent part: "Notwithstanding subdivision (b) of Section 12944.7 of the Water Code [analyzed in *Klajic I*] and Section 15 of this act [authorizing the Agency to sell water at wholesale only], but subject to paragraph (2), the agency may exercise retail water authority only within the [specified] boundaries..." (Agency Enabling Act, 72A West's Ann. Wat.-Appen. (2004 Supp.) § 103-15.1, subd. (a)(1), p. 4, italics added.) The statute then defines the boundaries by reciting specific metes and bounds.<sup>12</sup>

The metes and bounds<sup>13</sup> described in Assembly Bill (AB) 134 encompassed Santa Clarita Water Company's service territory. Presented with AB 134's changes to Agency's Enabling Act, the Court of Appeal held in *Klajic II* that AB 134 gave Agency authority to sell water at retail, independent of Water Code Section 12944.7(b). Agency was thus free to go forward with its acquisition of Santa Clarita Water Company's stock, and so it did.

Of potential significance now, the geographic area described in AB *did not* encompass *Valencia's* service territory. Thus the stage was set for a potential replay of *Klajic I* if and when Agency acquired Valencia. And so it has come to pass.

## **1.2. The Acquisition**

### **1.2.1. Agency's Courtship of Valencia**

Prior to the acquisition, intervenor Newhall Land & Farming Company (Land & Farming) solely owned Valencia. Land & Farming ultimately entered a

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<sup>12</sup> *Klajic II*, 121 Cal. App. 4th at 9.

<sup>13</sup> The metes and bounds of a piece of real property are the "territorial limits . . . as measured by distances and angles from designated landmarks and in relation to adjoining properties." BLACK'S LAW DICTIONARY 1012 (8th ed. 2004).

deal with Agency, which resulted in Agency's consensual condemnation of Land & Farming's shares of Valencia.

### **1.2.2. The Deal Structure**

On December 11, 2012, Agency presented Land & Farming with "an Offer to Purchase all issued shares of common stock of [Valencia]."<sup>14</sup> A copy of the contract of sale between Valencia and Agency, executed on December 17, 2012, is attached to SCOPE's complaint as Exhibit D. It is entitled "Eminent Domain Settlement Agreement among the Castaic Lake Water Agency, the Land and Farming Company, and Valencia Water Company" (Settlement Agreement). Though styled as a settlement of litigation, it is in substance a share purchase agreement.<sup>15</sup> In return for \$73 million (subject to various adjustments not material here), and upon court issuance of a condemnation order, Land & Farming agreed to convey all of the shares of Valencia to Agency.

In Section 4.1.7 of the Settlement Agreement, entitled "Consents and Approvals," Agency asserted it needed no governmental approvals beyond those obtained to consummate the transaction. Valencia's and Land & Farming's covenants relating to governmental consents, at Sections 5.2 and 5.3 of the Settlement Agreement, respectively, include no such definitive statement. Rather, they commit Valencia and Land & Farming to take "reasonable efforts" to secure "all consents, waivers, and authorizations" needed to "consummate the transactions contemplated by this agreement."

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<sup>14</sup> Minutes of the Special Meeting of the Board of Directors of the Castaic Lake Water Agency - December 12, 2012, available at <http://clwa.org/docs/wp-content/uploads/2013/03/Minutes121212.pdf>. We take official notice of the minutes pursuant to Rule 13.9.

<sup>15</sup> See Article I of the Settlement Agreement, entitled "Share Purchase Agreement."

None of the parties to the Settlement Agreement sought this Commission's approval of the acquisition.

### **1.2.3. Agency Approval of the Acquisition**

On December 12, 2012, by a vote of 9 to 1, Agency's board of directors voted in favor of buying Valencia. It appears that Agency's board members were given only one day's notice of that meeting. The next day, December 13, 2012, Agency filed an eminent domain action in Superior Court. Less than a week later, on December 17, 2012, the Agency's board approved and executed the settlement agreement. The day after that, Agency filed the settlement agreement with the Court. This was also a mere five days after Agency filed its eminent domain documents, and was also the last Wednesday before the Christmas and New Year's holidays.

### **1.3. State Court Approval of the Settlement of the Eminent Domain Case**

The Los Angeles Superior Court issued an order condemning Land & Farming's shares in Valencia on December 18, 2012. That was the same day that Agency filed the Settlement Agreement. When the Court issued its order, Agency had acquired Santa Clarita Valley's last privately held water retailer. According to press reports at the time, the acquisition gave Agency 84 percent of the valley's retail water connections.<sup>16</sup>

Valencia asserted in its January 2, 2013 applications that Agency was pursuing a Superior Court action in eminent domain with the intention of acquiring all the capital stock of Valencia. Valencia further stated that it expected

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<sup>16</sup> <http://www.signalscv.com/archives/84301/>. (Although we take notice of the press accounts we accord them no evidentiary weight on their own.)

this change of ownership and control is likely to be completed no later than early 2013.<sup>17</sup>

In fact, as just noted, the Superior Court in Los Angeles County had *already* entered a judgment approving the condemnation on December 18, 2012 – two weeks prior to Valencia filing its two applications. That the condemnation had already happened is something Valencia should have noted in its applications.<sup>18</sup>

#### **1.4. Post-Acquisition State Court Litigation**

Agency's acquisition of Valencia proved controversial. Santa Clarita Organization for Planning and the Environment, et al.,'s (SCOPE) filed an action in Superior Court for a writ overturning the condemnation order.<sup>19</sup> SCOPE's state court litigation is ongoing as of this date.

## **2. Procedural Background**

### **2.1. SCOPE'S Complaint**

SCOPE filed Complaint (C.) 13-01-005 against Agency and Valencia on January 4, 2013. SCOPE contends, among other things, that Agency's acquisition of Valencia required this Commission's approval which, as discussed above, neither Agency nor Valencia ever sought, much less obtained.

On January 18, 2013, the Chief Administrative Law Judge instructed Agency and Valencia to answer SCOPE's complaint by February 17, 2013.

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<sup>17</sup> Application 13-01-003 at 28.

<sup>18</sup> See Commission Rule of Practice and Procedure (Rule) 1.1 (never . . . mislead the Commission or its staff . . .). As we see no benefit accruing to Valencia from this misstatement, we will give Valencia the benefit of the doubt here, and presume that Valencia's use of future rather than past tense to describe the acquisition's status was an oversight rather than a deliberate attempt to mislead us.

<sup>19</sup> *Santa Clarita Organization for Planning the Environment v. Castaic Lake Water Agency et al.*, Los Angeles County Superior Court, Case No. BS141673.

On January 31, 2013, the assigned Administrative Law Judge (Judge) issued a “Ruling Requiring Applicant’s to File Pursuant to California Public Utility Code Section 851<sup>20</sup> for Authority to Transfer Control of a Public Utility; and that Valencia Water Company and Castaic Lake Water Agency must timely file and serve a full and complete answer to Case 13-01-005.” On February 11, 2013, Valencia moved for reconsideration of the ruling; SCOPE opposed the motion, and the motion is still pending.

On February 19, 2013, Valencia and Agency filed their answers to the Complaint. On February 20, 2013 Valencia and Agency both moved to dismiss the Complaint. SCOPE opposed the motions to dismiss. The motions are still pending.

SCOPE in turn filed on March 14, 2013 a Motion That the California Public Utilities Commission Hold a Hearing as Described in Section 855 and Thereafter that the Public Utilities Commission File an Action in Los Angeles Superior Court Writs & Receivers Department to Obtain the Appointment of a State Court Receiver Under Section 855 Over Valencia Water Company.” Valencia and Agency opposed this motion. The motion is still pending.

On June 17, 2013 SCOPE filed a notice of intent to seek intervenor compensation. On August 20, 2013 the assigned Judge issued a ruling which, subject to specific limitations and guidance, found SCOPE to be eligible.

On June 21, and June 26, 2013 SCOPE filed motions to compel the production of documents. On July 31, 2013 the assigned Judge issued a ruling disposing of the motion.

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<sup>20</sup> All further statutory references will be to the California Public Utilities Code unless otherwise specified.

On July 1, 2013, SCOPE also filed a “Motion for Order that Valencia Water Company discontinue its Advice Letter Submittals and that the Water Division cease its approval of such Advice Letters (until the question of jurisdiction is decided, or, in the alternative, Valencia Water Company, submits to the jurisdiction of the Commission and files an Application to Transfer Ownership in compliance with the Rules and Regulations of the Commission.)” Valencia opposed this motion. On July 18, 2013, the assigned Judge issued by e-mail a ruling denying this motion.

Finally, Newhall County Water District (District) and Newhall Land & Farming Company (Land and Farming) were granted party status.

On September 30, 2013 Valencia filed an amendment to the motion for interim rate relief. ORA filed in opposition, and Valencia was allowed to reply. This motion is pending.

## **2.2. Valencia’s Applications**

Turning to Valencia’s applications, in accordance with the Rate Case Plan for Class A Water Companies as adopted and modified by the Commission’s Decision (D.) 04-06-018 and D.07-05-062, and with Rule 6(a), Article 4, and Article 6 of the Commission’s Rules of Practice and Procedure (Rules), Valencia filed its general rate case Application (A.) 13-01-003 for Test Years beginning January 1, 2014 and January 1, 2015, and for an Escalation Year beginning January 1, 2016. Valencia also filed A.13-01-004 to update its cost of capital.

For the Test Year beginning July 1, 2012 and Escalation Years beginning July 1, 2013 and July 1, 2014, Valencia requests increases in rates for general metered water service. Valencia is also requesting that the tariff rate for recycled water which the company requested by a separate application (A.11-06-005) be adjusted to equal 75 percent of the quantity rate the Commission adopts for

general metered service in this proceeding. Finally, Valencia is requesting advice letter treatment for an in-conduit hydro generation project.

### **2.3. Our Investigation**

In Investigation 13-04-003, we directed Valencia to file a Tier I Advice Letter to establish a Transfer of Control Memorandum Account. Valencia filed Advice Letter No. 148 on April 16, 2013. Valencia's rates are subject to refund for any components currently included in rates which would be unjust and unreasonable costs of service by a public utility subject to the jurisdiction of this Commission.

### **3. Discussion**

The welter of pleadings and motions we have received in this case raise a series of questions regarding this agency's jurisdiction. At issue are: (1) our jurisdiction to review a governmental entity's acquisition of a jurisdictional utility, (2) our continued jurisdiction over an erstwhile jurisdictional utility following its acquisition by a governmental entity, and (3) our jurisdiction over the new, governmental, owner of an erstwhile jurisdictional utility.

Accordingly, in a ruling dated July 1, 2013, the assigned Judge asked for briefing on a series of jurisdictional questions.<sup>21</sup> The parties' responses to those questions shape our discussion below.

#### **3.1. Commission Jurisdiction Generally**

The Public Utilities Commission is "not an ordinary administrative agency," but a body with broad legislative and judicial powers to regulate and

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<sup>21</sup> Agency, Valencia, SCOPE, District, and the Division (now "Office") of Ratepayer Advocates (ORA) all filed opening briefs in response to this ruling. These same entities, plus Land & Farming filed reply briefs. SCOPE filed a reply and sur-reply brief.

supervise the operations of the State's utilities.<sup>22</sup> Those powers are rooted in the State Constitution: Article XII specifically authorizes the Commission to fix rates, establish rules, hold various types of hearings, award reparation, and establish its own procedures for “private corporations and persons.”<sup>23</sup> The state legislature, pursuant to its plenary authority to do so, has further expanded the scope of the Commission’s authority and jurisdiction.<sup>24</sup> The legislature has vested the Commission with, among other things, authority to “supervise and regulate every public utility in the State.”<sup>25</sup>

The legislature also enacted Section 1759, which provides:

No court of this state, except the Supreme Court and the court of appeal, to the extent specified in this article, shall have jurisdiction to review, reverse, correct, or annul any order or decision of the commission or to suspend or delay the execution or operation thereof, or to enjoin, restrain, or interfere with the commission in the performance of its official duties, as provided by law and the rules of court.

The legislature thus conferred exclusive jurisdiction on the Commission over matters within its regulatory sphere. This exclusivity is applied broadly: Section 1759 has been interpreted to bar actions not only when an award would directly contravene a specific order or decision of the Commission, “but also

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<sup>22</sup> *Wise v. Pacific Gas & Electric* (1999) 77 Cal. App. 4th 287, 300.

<sup>23</sup> *See* Cal. Const., Art. XII, §§ 2, 4, 6.

<sup>24</sup> *See* Cal. Const., art. XII, § 5 (authorizing the legislature “to confer additional authority and jurisdiction upon the commission” and “to establish the manner and scope of review of commission action in a court of record”).

<sup>25</sup> Section 701.

when an award of damages would simply have the effect of undermining a general supervisory or regulatory policy of the commission.”<sup>26</sup>

It is a longstanding rule that this Commission has the power to determine for the purpose of the exercise of its jurisdiction all questions of fact essential to the proper exercise of that jurisdiction. Its jurisdiction cannot be affected by the circumstance that these facts are denied.<sup>27</sup> We are vested with power to determine facts upon the existence of which we are authorized to exercise jurisdiction.<sup>28</sup>

The Commission’s jurisdiction is, however, limited to “private corporations and persons,”<sup>29</sup> except in limited circumstances that the legislature may establish.<sup>30</sup> In general, the Commission has “no tenable ground upon which to base the conclusion that the rates charged by a municipality for its service in carrying on any public utility, either within its own limits or in outside territory, are under the control of the . . . commission.”<sup>31</sup> Put more starkly, the Commission is not “empowered to regulate and supervise municipally owned public utilities.”<sup>32</sup> “In the absence of legislation otherwise providing, the Commission's

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<sup>26</sup> *San Diego Gas & Electric Co. v. Sup. Ct.* (1996) 13 Cal. 4th 893, 918.

<sup>27</sup> *Limoneira Co. et al. v. Railroad Commission* (1917) 174 Cal. 232, 242-43.

<sup>28</sup> *Producers Transp. Co. v. Railroad Commission* (1917) 176 Cal. 499, 506.

<sup>29</sup> *See* Cal. Const. art. XII, § 3.

<sup>30</sup> *Id.* *See, e.g.*, Section 29047 (subjecting the San Francisco Bay Area Rapid Transit District to Commission safety regulation).

<sup>31</sup> *City of Pasadena v. Railroad Commission* (1920) 183 Cal. 526, 535 (*City of Pasadena*), *overruled in part by County of Inyo v. Pub. Util. Com.* (1980) 26 Cal. 3d 154, 164 (*County of Inyo*).

<sup>32</sup> *Los Angeles Gas & Elec. Corp. v. Dep. Of Public Service* (1927) 52 Cal. App. 27, 29.

jurisdiction to regulate public utilities extends only to the regulation of privately owned utilities.”<sup>33</sup> The Supreme Court reiterated this principle in *Orange County Air Pollution Control Dist. v. Public Util. Com.*: “The commission has no jurisdiction over municipally owned utilities unless expressly provided by statute.”<sup>34</sup>

Against the backdrop of these general rules, we turn now to the particular issues before us.

### **3.2. Commission Review of the Condemnation**

#### **3.2.1. What jurisdiction, if any, does the Commission have to determine the legality of Agency’s condemnation of Valencia’s stock?**

We conclude that the Commission has no authority to review the condemnation, or to require filings from Agency or Valencia under Section 851 et seq. in connection with the condemnation. Both conclusions rest on *California Public Utilities Comm’n v. City of Fresno*.<sup>35</sup>

Section 851 concerns Commission review of, among other things, a jurisdictional utility’s disposition of assets. It provides in pertinent part as follows:

A public utility, other than a common carrier by railroad subject to Part A of the Interstate Commerce Act (49 U.S.C. Sec. 10101 et seq.), shall not sell, lease, assign, mortgage, or otherwise dispose of, or encumber the whole or

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<sup>33</sup> *Los Angeles Met. Transit Authority v. Public Utilities Com.* (1959) 52 Cal. 2d 655, 661.

<sup>34</sup> *Orange County Air Pollution Control Dist. v. Public Util. Com.* (1971) 4 Cal. 3d 945, 953 at n. 7.

<sup>35</sup> *California Public Utilities Comm’n v. City of Fresno* (1967) 254 Cal. App. 2d 76 (*Fresno*).

any part of its . . . plant, system, or other property necessary or useful in the performance of its duties to the public . . . or by any means whatsoever, directly or indirectly, merge or consolidate its . . . plant, system, or other property, or franchises or permits or any part thereof, with any other public utility, without first having either secured an order from the commission authorizing it to do so.

Section 854 concerns Commission review of a change in ownership of a jurisdictional utility. It provides in pertinent part as follows:

No person or corporation, whether or not organized under the laws of this state, shall merge, acquire, or control either directly or indirectly any public utility organized and doing business in this state without first securing authorization to do so from the commission. . . . No public utility organized and doing business under the laws of this state, and no subsidiary or affiliate of, or corporation holding a controlling interest in a public utility, shall aid or abet any violation of this Section.

*Fresno* is the leading case on Commission review of condemnations. In *Fresno*, the Commission sued to set aside the City of Fresno's condemnation of assets of the Bowen Land Company, Inc., a water corporation and so a public utility subject to this Commission's jurisdiction. In July 1965, the company agreed to sell its entire water system and related facilities to the City of Fresno. The City of Fresno and the Bowen Land Company filed with the Commission pursuant to Section 851, seeking Commission approval of the sale.

In September 1965, the Commission stated that the proposed agreement of sale between the jurisdictional water company and the City of Fresno did not protect the water company's consumers. Nonetheless, we approved the sale (to take effect one year thereafter) subject to certain conditions.

Instead of accepting the conditions imposed by the Commission, the City of Fresno filed suit in superior court to condemn the Bowen Land Company's

system. The trial court entered judgment on the pleadings in favor of the City of Fresno.

The Commission appealed, seeking to have this judgment set aside. We argued on appeal that the superior court could not enter a final unconditional judgment transferring title to assets of a jurisdictional utility until and unless we granted approval under Section 851.

The Court of Appeal disagreed with us. It framed the issue before it as follows: does Section 851 regulate a municipality's otherwise unrestricted power to condemn public utility property under Civ. Proc. § 1241? The court concluded that Civ. Proc. § 1241 trumped Section 851 for three basic reasons:

- (1) [Section 851] contains no express language which purports to control or affect a public entity which is exercising its own separate, distinct, and independent power to acquire property for a public use through the exercise of the power of eminent domain..<sup>36</sup>
- (2) [Section 851] deals with the disposition of public utility property in general . . . . On the other hand, Code of Civil Procedure Section 1241 is specific; it unequivocally empowers a city to condemn public utility property even though it has already been appropriated to a public use . . . . It is the rule that a specific provision of a statute controls a general provision.<sup>37</sup>
- (3) [When] all of the legislative enactments on the subject were carefully considered and reconciled, the conclusion is inescapable that the Legislature did not and could not have intended to include a public entity's power of eminent

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<sup>36</sup> *Id.* at 82.

<sup>37</sup> *Id.* at 84 (internal citation omitted).

domain within the mandatory requirement of [Section 851].”<sup>38</sup>

The court also noted that “under . . . Sections 1401-1421, the Commission is authorized to determine the just compensation payable by a public entity for public utility owned property which it seeks to acquire through eminent domain if it is invited to do so by the condemnor.” The court of appeal found that these Sections of the Code demonstrate that the Legislature intended to involve the Commission in a condemnation proceeding only at the condemnor’s request, and then only on the limited question of “just compensation.”<sup>39</sup>

Sections 851 and 854 have a common purpose, and relate to the same subject matter: regulation of the transfer of utility property. Section 851 addresses disposition of utility assets, while Section 854 addresses changes in utility ownership or control. The reasoning of the *Fresno* court regarding Section 851 applies with equal force to Section 854. Section 854, like Section 851, says nothing about condemnation actions. Section 854 is, like Section 851, a statute that concerns a general set of transactions, and not condemnation specifically, and the “legislative enactments” that the *Fresno* court references in its decision are the same for both Sections 851 and 854.<sup>40</sup>

Accordingly, we conclude that we lack jurisdiction to require Valencia or Agency to file with us under Section 851 et seq. for review of Agency’s acquisition of Valencia.

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<sup>38</sup> *Id.* (internal citation omitted).

<sup>39</sup> *Id.* at 85 (internal citation omitted).

<sup>40</sup> *See County of Inyo v. Los Angeles Dept. of Water & Power*, D.89576, 84 CPUC 515, 526, 1978 Cal. PUC. Lexis 1379 \*30.

This conclusion holds true even if Agency's condemnation is outside of its legal authority (i.e., *ultra vires*), and even though some or all of Valencia's service territory is outside the metes and bounds set out in AB 134. The *Fresno* court held that "the jurisdiction of the superior court, though limited to an action in eminent domain, is also *exclusive*."<sup>41</sup> Therefore we are bound by the superior court's judgment in Los Angeles Superior Court Case BC 497322 (December 18, 2012 Final Order of Condemnation) as to the legality of the condemnation.

### **3.3. Commission Jurisdiction Post-Condemnation**

#### **3.3.1. Agency's Authority to Engage in Retail Sales in Valencia's Service Territory**

One of the odder aspects of this proceeding is that Valencia is asserting that we have continuing jurisdiction over it. It is unusual for an entity to actively assert that we have jurisdiction over it. More typical by far is for an entity to dispute our assertion of jurisdiction.<sup>42</sup> We do not purport to know Valencia's motives. But an understanding of the *Klajic* cases, and in particular the changes to the Agency Enabling Act that *Klajic I* spawned, may help provide some context for the current issue.

The legislation amending the Agency Enabling Act, which was promulgated during the pendency of the *Klajic* cases, authorized Agency to make retail sales within a specified geographic area. But, as discussed earlier,

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<sup>41</sup> *Id.* at 88 (emphasis added).

<sup>42</sup> Typically, putative utilities contest our exercise of jurisdiction. See, e.g. *Greyhound Lines, Inc. v. Public Utilities Com.* (1968) 68 Cal. 2d 406; *Richfield Oil Corp. v. Pub. Util. Comm.* (1960) 54 Cal. 2d 419, cert. den. sub nom. *Southern Counties Gas Co. of California v. Pub. Util. Comm.*, 364 U.S. 900; *People v. Western Air Lines, Inc.* (1954) 42 Cal. 2d 621. That said, assertions of jurisdiction are not altogether unheard of. See, e.g., *Covalt, supra*.

Valencia's service territory is today outside the retail service area of Agency set out in AB 134.

The practical implication of this is that Agency may not be able to rely on its authority under the Agency Enabling Act to engage in retail sales, at least to Valencia customers outside the geographic area described in AB134. Thus, to serve those customers, Agency would appear to need to exercise its independent authority under Water Code § 12944.7.

The *Klajic I* court stated in dicta that, notwithstanding Water Code § 12944.7's limitation on Agency's acquisition of retail water sellers, Agency could acquire a retail water seller if the retail water seller became: "a wholly-owned subsidiary of, or wholly separate from, the Agency." The appellate court went on to say: "but whatever form [the acquired retail seller] takes, it must be distinct from the Agency and remain subject to PUC regulation to comply with the statute."

This may be why Valencia is arguing that it is subject to our jurisdiction. It appears that, to sell water pursuant to Cal. Water Code § 12944.7, Agency may need Valencia to remain subject to this Commission's jurisdiction.

### **3.3.2. How Can a Governmental Entity Own a Private, For-Profit Company Like Valencia?**

We asked of the parties how Agency can buy and hold stock in a nominally private for-profit entity.<sup>43</sup> DRA cited us to, and *Klajic I* Agency relied on, Art. XVI, § 17 of the California Constitution. That Section provides in pertinent part as follows:

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<sup>43</sup> The question we posed was: "What authority authorizes Agency, a public entity, to (1) become and (2) remain the 'parent' of a wholly-owned private subsidiary?"

The State shall not in any manner loan its credit, nor shall it subscribe to, or be interested in the stock of any company, association, or corporation, except that the State and each political subdivision, district, municipality, and public agency thereof is hereby authorized to acquire and hold shares of the capital stock of any mutual water company or corporation when the stock is so acquired or held for the purpose of furnishing a supply of water for public, municipal or governmental purposes; and the holding of the stock shall entitle the holder thereof to all of the rights, powers and privileges, and shall subject the holder to the obligations and liabilities conferred or imposed by law upon other holders of stock in the mutual water company or corporation in which the stock is so held.<sup>44</sup>

Having been presented with the authority purportedly underlying Agency's acquisition, we searched for prior Commission decisions in circumstances in which a governmental entity acquired a Commission-jurisdictional entity. Remarkably, the Commission seems never to have encountered this fact pattern before.<sup>45</sup> Deeper exploration of Art. XVI, § 17's history offers some explanation of why not.

The language of Art. XVI, § 17 first appeared in nascent form in the 1849 constitution, Art. XI § 10, where it read: "The credit of the State shall not, in any manner, be given or loaned to or in aid of any individual, association, or corporation, nor shall the State directly or indirectly become a stockholder in any association or corporation." It has since been amended numerous times.

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<sup>44</sup> Cal. Const. Art. XVI, § 17.

<sup>45</sup> In addition to a complete absence of Commission decisions dealing with Cal. Const. Art. XVI, § 17, we located only one court decisions citing to the water provisions of Cal. Const. Art. XVI, § 17 – *Klajic I*. The *Klajic I* court merely noted Agency's assertion of authority under Cal. Const. Art. XVI, § 17, without discussion. The *Klajic* court did not rule that section 17 *did* apply.

The Constitution of 1879 contained an essentially identical provision at Art. XII, (then Corporations, now Public Utilities) § 13: “The State shall not in any manner loan its credit, nor shall it subscribe to or be interested in the stock of any company, association, or corporation.” In the early 1930s and ‘40s, some exceptions to the 1879 provision were added to Art. IV (Legislative), allowing specific political subdivisions to hold stock of mutual water companies. For example, Art. IV § 31(b), added Nov. 8, 1932, read: “Nothing contained in this Constitution shall preclude the City of Escondido, California, from acquiring or holding shares of the capital stock of any mutual water company or corporation when such stock is so acquired or held for the purpose of furnishing a supply of water for public or municipal purposes....” Similar specific provisions were added in 1934 and 1942, allowing acquisition of mutual water company or corporation shares or stock first by “school districts and cities of the fifth and sixth class,” and then by “the State.”

The present language in Art. XVI, § 17 took shape in 1956. The legislature placed a measure on the 1956 ballot as Constitutional Amendment No. 29. The amendment repealed the provisions of Article IV just mentioned, and extended the water company provision to the State and each of its political subdivisions. The measure passed, and so as of 1956, Art. XII § 13 read: “The State shall not in any manner loan its credit, nor shall it subscribe to or be interested in the stock of any company, association, or corporation, *except that the State and each political subdivision, district, municipality, and public agency thereof is hereby authorized to acquire and hold shares of the capital stock of any mutual water company or corporation when such stock is so acquired or held for the purpose of furnishing a supply of water for public, municipal, or governmental purposes.*” Subsequent amendments to the

Constitution renumbered the provision, first to Art. XIII, § 42, and now to its current place at Art. XVI, § 17.<sup>46</sup>

As we have already remarked, we can find no record of our ever having encountered Cal. Const. Art. XVI, § 17 or its predecessors, much less of having exercised jurisdiction post-acquisition over a water corporation that has been acquired pursuant to them.<sup>47</sup> The parties have brought no such instances to our attention. It is notable as well that the only reported case discussing the provision in the context of the acquisition of a mutual water company or corporation is *Klajic I*. This proceeding would appear to present the first instance ever of a governmental entity that acquired shares in a water company seeking to have us exercise jurisdiction over the acquired entity.

The language of Art. XVI, § 17 is ambiguous. It raises the question of whether “mutual” modifies “water company” only, or modifies both “water company” and “corporation.” That is, the text could be read equally well as “the State may hold shares in any mutual water company or in any mutual water corporation” or as “the State may hold shares in any mutual water company, or in any corporation.”

Section 1858 of the California Code of Civil Procedure provides guidance on how to resolve this ambiguity:

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<sup>46</sup> Amendments also added and revised the portions of the section relating to public pensions, which are not material here.

<sup>47</sup> We note that we did exercise jurisdiction over Independence Water Co. at a time when the Los Angeles Department of Water & Power (LADWP) owned 36.68% of outstanding shares. See *Application of Independence Water Co.*, D.78385, 72 CPUC 10, 1971 Cal. PUC Lexis 347. Share acquisition, in 1934, predated Art. XVI § 17 and its predecessors. We are unaware of the legal basis for LADWP’s ongoing ownership of shares, or its subsequent acquisition of the company’s remaining shares.

In the construction of a statute . . . the office of the judge is simply to ascertain and declare what is in terms or in substance contained therein, not to insert what has been omitted, or to omit what has been inserted; and where there are several provisions or particulars, such a construction is, if possible, to be adopted as will give effect to all.

In addition, Section 1859 of the Code of Civil Procedure states that “[i]n the construction of a statute the intention of the Legislature . . . is to be pursued, if possible.” These rules of statutory construction “appl[y] with equal force to initiative measures adopted by the electorate.”<sup>48</sup>

Courts often examine ballot pamphlets to help discern an initiative’s purposes. For instance, the California Supreme Court used the ballot pamphlet for Proposition 13 to interpret that initiative. The Court stated: “[W]hen, as here, the enactment follows voter approval, the ballot summary and arguments and analysis presented to the electorate in connection with a particular measure may be helpful in determining the probable meaning of uncertain language.”<sup>49</sup> Reference to ballot pamphlets is a long-standing practice in California for the purposes of interpreting initiatives,<sup>50</sup> as the ballot pamphlet is analogous to the legislative history of a particular measure.

The ballot arguments for adoption of what is now Art. XVI, § 17 strongly suggest that Art. XVI, § 17, as envisioned in 1956, authorized only acquisition of

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<sup>48</sup> *People v. Callegri*, 154 Cal. App. 3d 856, 866 (1984) (citing *Sand v. Superior Court*, 34 Cal. 3d 567, 571 (1983); *Amador Valley Joint Union High School Dist. v. State Bd. of Equalization*, 22 Cal. 3d 208, 245 (1978)).

<sup>49</sup> *Amador Valley*, 22 Cal. 3d at 245-46.

<sup>50</sup> See *People v. Ottey*, 5 Cal. 2d 714, 723 (1936) (“argument sent to the voters . . . may be resorted to as an aid in determining the intention of the framers and the electorate when . . . necessary.”).

shares and/or stock in mutual water companies. As the ballot argument in favor of adoption states: "it . . . provide[s] a means by which public and private water users can work together harmoniously *through existing non-profit mutual water companies.*"<sup>51</sup> There is no ambiguity here; the proponent's argument refers only to mutual water companies, and clarifies further that they should be not-for-profit.

We do not, as a general rule, regulate mutual water companies.<sup>52</sup> Insofar as Art. XVI, § 17 was only meant to – or was only perceived as meaning to – authorize acquisition of shares in non-profit mutual water companies, most or all invocations of authority under Art. XVI, § 17 and its predecessors would not draw our notice. That may be why we have not previously seen the fact pattern now before us. Valencia, we note, was a for-profit water corporation, prior to its acquisition, and not a mutual water company.

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<sup>51</sup> 1956 Ballot, at 20 (Argument in Favor of Senate Constitutional Amendment No. 29) (emphasis added). We take official notice of the contents of the ballot proposition pursuant to Rule 13.9.

<sup>52</sup> A mutual water company is one that is "organized for the purposes of delivering water to its stockholders and members at cost . . ." Section § 2705; *see, e.g., Thayer v. California Development Co.* (1912) 164 Cal. 117 (a private water company may be organized to sell water for purposes of private gain and not in so doing become a public utility); *Stratton v. Railroad Commission* (1921) 186 Cal. 119 (mutual water company not a public utility, and so superior court, not the railroad commission, had jurisdiction over a dispute concerning allocation of water among stockholders in the mutual water company); *Mound Water Co. et al. v. Southern Cal. Edison Co.* (1921) 184 Cal. 602 (same). What is nominally a mutual water company may be, or may become, a public utility subject to the Commission's jurisdiction if it dedicates its assets to public use. *See Samuel Edwards Assocs. v. Railroad Comm.*, 196 Cal. 62 (1925); *see also Richfield Oil Corp.*, 54 Cal. 2d at 425 (discussing public dedication generally). So far as we are aware, Valencia has always been a for-profit public utility rather than a mutual water company or corporation.

The language of Art. XVI, § 17 and the ballot language that led to its adoption as part of the California Constitution suggest that Agency's reliance on Art. XVI, § 17 as authority permitting it to own Valencia as a for-profit entity would be misplaced. While that is ultimately for the courts rather than for us to determine,<sup>53</sup> even an unfounded public perception that Art. XVI, § 17 is limited to acquisition of mutual water company shares would explain why we have not encountered it previously. And so we face a question of first impression: does a governmental entity purchasing all a corporation's shares remove the purchased corporation from our jurisdiction?

**3.3.3. The Commission's Jurisdiction Extends only to Private, For-Profit Utilities; The Commission Lacks Jurisdiction over Municipal Utilities**

As discussed above, Cal. Const. Art. XII, § 3 extends the jurisdiction of this Commission only to "private corporations." The Public Utilities Act does not specifically define "private corporations," but does define "corporation" as including "a corporation, a company, an association, and a joint stock association." Absent from this list is any political subdivision of the State.<sup>54</sup>

The legislature may extend the Commission's jurisdiction to cover municipalities, under Cal. Const. Art. XII, § 5. As the Supreme Court noted in *County of Inyo*, the legislature had not extended this Commission's jurisdiction to cover municipal utilities serving customers outside of municipal boundaries. The legislature has still not done so.

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<sup>53</sup> See discussion, above, re our lack of jurisdiction to review condemnations.

<sup>54</sup> Pub. Util. Code § 204.

Upon Agency's acquisition of Valencia, Valencia became a state-owned rather than "private" corporation. Just as whether Agency condemned Valencia's stock or assets is of no moment to whether we have jurisdiction to review the condemnation, whether Agency owns Valencia's stock or its assets is of no moment to whether we have ongoing jurisdiction to regulate Valencia. The effect is the same – Valencia is now a state-owned rather than privately-owned corporation. It is therefore outside our jurisdiction, pursuant to *City of Pasadena et al.* and *County of Inyo*, just as Valencia would be outside our jurisdiction going forward had Agency acquired all of Valencia's assets rather than its stock.

We recognize that the effect of our decision is to leave Valencia's customers without recourse to the Commission. The *Fresno* and *County of Inyo* decisions unequivocally establish that our desire to protect consumers does not confer standing to challenge a condemnation, and that unless the legislature "confer[s] jurisdiction upon the PUC to correct this situation"<sup>55</sup> we are unable to regulate Valencia going forward. Our desire to protect consumers does not of itself create jurisdiction. Thus, for instance, the residents of Inyo County were left subject "to the fixing of water rates by the [LADWP] over whom they have neither control nor check."<sup>56</sup> Their fate did not lead the Supreme Court to find that we had jurisdiction over LADWP rates.

We recognize as well that dicta in *Klajic I* may be read to imply that this Commission can retain jurisdiction even where Agency buys up a retail water company's stock. We do not subscribe to such a reading. *Klajic I* remanded to the trial court the question of our jurisdiction over the acquired entity; the *Klajic* trial

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<sup>55</sup> *County of Inyo*, 26 Cal. 3d at 167.

<sup>56</sup> *Id.*

court and the *Klajic II* court never reached that question because of AB 134's passage. Thus the courts have never directly addressed the issue of our jurisdiction in a situation such as the one before us.

#### **4. Conclusion**

We conclude, as discussed herein, that we lack jurisdiction to review Agency's condemnation of Valencia, and that we lack ongoing regulatory jurisdiction over Valencia. Consistent with those conclusions, we dismiss the consolidated proceedings. We also cancel the certificate of public convenience and necessity for Valencia.<sup>57</sup>

#### **5. Categorization and Need for Hearing**

We affirm the preliminary determination of adjudicatory for the consolidated proceedings.

Our preliminary determination was that hearings were required in all of the consolidated proceedings. In light of our dismissal of those proceedings, we conclude that no hearings are necessary.

#### **6. Comments on Proposed Decision**

The proposed decision of the Administrative Law Judge in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of

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<sup>57</sup> We note that there is at least some possibility that SCOPE may prevail in its Superior Court action against Valencia and Agency. If the acquisition is reversed, it may be that Valencia once again becomes a public utility subject to our jurisdiction. Should that be the case, we would expect Valencia to file on an expedited basis for a certificate of public convenience and necessity. We would also expect Valencia to refile its currently-effective tariffs so that we could put tariffs back in place quickly.

Practice and Procedure. The following parties filed comments: Agency, District, Land & Farming, ORA, SCOPE, Valencia. Each Party also filed reply comments.

District, ORA, SCOPE, and Valencia all ask us correct the Proposed Decision's (PD's) description of the area within which AB 134 authorized Valencia to provide retail service, and related discussion. We have corrected those portions of the decision. Since the corrections relate only to the background for our decision, they do not impact any of our conclusions of law or fact, or our ordering paragraphs.

Agency asks the Commission to "consider simply deleting the portions of the PD that are not relevant to the core questions resolved in the PD: (1) whether the Commission is vested with jurisdiction over Agency's acquisition of the shares of Valencia through eminent domain (Part 3.2.1 at pp.15-19; and (2) whether, following that acquisition, the Commission retains any jurisdiction over Valencia (Part 3.3.3 at pp. 26-28)." Upon consideration of Agency's request, we opt to leave the PD's discussion of the transaction and related legal issues intact. As discussed in the PD, there are numerous unique aspects to these proceedings that warrant examination, even if they ultimately do not determine the proceedings' outcome. It is appropriate for us to set out the context for the jurisdictional dispute that we here resolve, as well as for us to discuss the potential practical ramifications of our decision.

Land & Farming continues to argue for ongoing Commission jurisdiction over Valencia. We do not find its arguments persuasive.

Land & Farming cites to Rule 7.1 and to the Commission's preliminary determination that hearings were required in these consolidated proceedings to argue that failing to hold hearings constitutes legal error. This argument lacks merit. A determination under Rule 7.1 that hearings are needed is merely

preliminary.<sup>58</sup> We may, as we do here, subsequently determine that no hearings are needed. Land & Farming offers no explanation for why hearings are needed to supplement the record here, where the only material fact – *i.e.*, that the government now wholly owns Valencia – is indisputable.

Land & Farming incorrectly contends that the PD “ignores” Valencia’s status as a corporation in good standing. In fact, the decision holds that *even if* Valencia is a corporation in good standing (as Land & Farming contends), it is no longer a *privately owned* corporation. As discussed at length above, the state Constitution limits our remit to private corporations unless the legislature directs otherwise, and the legislature has not done so here.

Finally, Land & Farming devotes several pages of its brief to arguing that Valencia is not Agency’s alter ego. Land & Farming’s argument is not relevant to our decision. We make no finding on alter ego here, and need not do so to reach our conclusions.

## **7. Assignment of Proceeding**

Catherine J. K. Sandoval is the assigned commissioner and Todd O. Edmister and Douglas M. Long are the co-assigned ALJ’s and co-Presiding Officers in this proceeding.

### **Findings of Fact**

1. Agency is a governmental entity.

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<sup>58</sup> *See, e.g.*, Rule 7.1(b) (emphasis added): “Complaints - For each proceeding initiated by complaint, the Chief Administrative Law Judge, in consultation with the President of the Commission, shall determine the category of the proceeding and shall preliminarily determine the need for hearing.”

2. Agency condemned all Valencia's stock through an eminent domain proceeding.

3. Valencia is now a wholly-owned subsidiary of Agency.

4. All pending motions not previously ruled on are moot.

**Conclusions of Law**

1. The Commission's jurisdiction is limited to "private corporations" except where the legislature has extended jurisdiction to a governmental entity.

2. The Commission lacks jurisdiction to subject condemnations by governmental entities to review under Cal. Pub. Util. Code §§ 851 or 854.

3. Because of Agency's acquisition of Valencia, Valencia is no longer a private corporation.

4. No legislation extends our jurisdiction to Valencia, now that Valencia is a wholly-owned subsidiary of Agency.

5. If a Commission-regulated water utility becomes governmentally-owned, its certificate of public convenience and necessity should be cancelled.

6. Castaic's motion to dismiss is partially granted. All pending motions not previously ruled on are denied.

**O R D E R**

**IT IS ORDERED** that:

1. The certificate of public convenience and necessity of Valencia Water Company is cancelled.

2. If Valencia Water Company becomes a public utility again in the future, we will entertain an application for a certificate of public convenience and necessity and a filing of tariffs.

A.13-01-003 et al. ALJ/TOD/dc3

3. Castaic Lake Water Agency's motion to dismiss is granted in part. All other outstanding motions are denied.

4. Application (A.) 13-01-003; Investigation 13-04-003; A. 13-01-004; and Case 13-01-005 are dismissed.

5. The consolidated proceedings are closed.

This order is effective today.

Dated February 27, 2014, at San Francisco, California.

MICHAEL R. PEEVEY  
President  
MICHEL PETER FLORIO  
CATHERINE J.K. SANDOVAL  
CARLA J. PETERMAN  
MICHAEL PICKER  
Commissioners

# Letter No. 60

Lynne Plambeck  
Santa Clarita Organization for Planning  
and the Environment (SCOPE)  
P.O. Box 1182  
Santa Clarita, CA 91386

## Response to Comment No. 60-1

Comment noted. The Hearing Examiner meeting followed the requirements established by Los Angeles County for a meeting of this type. The Hearing Examiner position was created by County Ordinance in 2008 for major projects, such as landfills, so that a public hearing can be held in the community prior to the Regional Planning Commission (RPC) hearing. The authority and duties of the Hearing Examiner are contained in Sections 22.60.030 and 22.60.040 of the Los Angeles County Code. The Hearing Examiner reports to the RPC, and the RPC will hold a public hearing in the local community on the Proposed Project, including the Conditional Use Permit (CUP), Oak Tree Permit, and Final EIR. The RPC will receive all public comments on the Proposed Project, including those presented at the Hearing Examiner hearing, and the public will again be given the opportunity to comment on the Proposed Project at the future RPC hearing.

## Response to Comment No. 60-2

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

## Response to Comment No. 60-3

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR.

## Response to Comment No. 60-4

The California Department of Transportation (Caltrans) is the Reviewing Agency for traffic concerns on Interstate 5 (I-5). Their comments are included in the Final EIR as Comment Letter Nos. 24 and 390, and detailed responses to their comments have been provided in Topical Response #25, Traffic. Topical Response #25 also includes a discussion of issues raised by other commenters related to traffic.

Please also see Topical Response #1, Air Quality, for a discussion of potential air quality impacts associated with additional truck traffic.

## Response to Comment No. 60-5

Please see the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR for an updated analysis. Please also see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions, and Topical Response #25, Traffic.

Please see the revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR for an updated analysis. Please also see Topical Response #12, Greenhouse Gas Emissions and Climate Change.

### Response to Comment No. 60-6

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR.

### Response to Comment No. 60-7

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR.

### Response to Comment No. 60-8

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR.

### Response to Comment No. 60-9

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

### Response to Comment No. 60-10

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

### Response to Comment No. 60-11

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

### Response to Comment No. 60-12

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

### Response to Comment No. 60-13

BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the Mitigation Monitoring and Reporting Plan (MMRP) included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the South Coast Air Quality Management District (SCAQMD), who will oversee compliance with permit conditions and dust control plans.

### Response to Comment No. 60-14

Please see Topical Response #23c, Water Supply, for a discussion of the Water Supply Assessment, and Appendix J for an updated Water Supply Assessment for the Proposed Project.

The ownership and regulatory oversight of the Valencia Water Company is not an environmental issue related to this project.

### Response to Comment No. 60-15

Please see Topical Response #30 for a discussion of Water Quality.

Response to Comment No. 60-16

Comment noted.





GAIL FARBER, Director

## COUNTY OF LOS ANGELES

### DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO,  
P. O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

#61

October 23, 2014

IN REPLY PLEASE  
REFER TO FILE: EP-5

Ms. Iris Chi  
County of Los Angeles Department of Regional Planning  
Zoning Permits North Section, Room 1348  
320 West Temple Street  
Los Angeles, CA 90012-3208

Dear Ms. Chi:

**CHIQUITA CANYON LANDFILL MASTER PLAN REVISION  
DRAFT ENVIRONMENTAL IMPACT REPORT  
PROJECT NO. R2004-00559-(5)  
29201 HENRY MAYO DRIVE, CASTAIC 91384**

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Chiquita Canyon Landfill Master Plan Revision dated July 10, 2014.

The applicant, Chiquita Canyon Landfill LLC., is requesting a replacement Conditional Use Permit (CUP) in order to continue operating an existing Class III waste disposal facility under a new grant. The current CUP 89-081(5) was approved in 1997 and will expire upon completion of the approved fill design as shown in Exhibit "A" site plan, or when 23 million tons of capacity is reached, or on November 24, 2019, whichever occurs first.

The proposed Project, among other things, entails increasing the permitted daily disposal limit from 6,000 to 12,000 tons per day; increasing the permitted weekly disposal limit from 30,000 to 60,000 tons per week; increasing the disposal footprint laterally by 143 acres; increasing the maximum elevation by 143 feet; and relocating the site entrance from Henry Mayo Drive (SR-126) to Wolcott Way. The DEIR indicates this Project would extend the Landfill's life by an additional 21 to 38 years depending upon the daily disposal rate. The Project also provides for the development of an on-site household hazardous waste collection facility and an open mixed organics composting operation as well as sets aside a 5-acre site for the potential development of a conversion technology facility.

## Environmental Programs

1. Project Need:

Address impacts from the following legislation currently in effect in substantiating the need for additional disposal capacity, including, but not limited to:

- a. Assembly Bill (AB) 32 (The California Global Warming Solutions Act of 2006) – According to the *First Update to the Climate Change Scoping Plan* dated May 2014, Air Resources Board and CalRecycle will lead the development of program(s) to eliminate disposal of organic materials at landfills. If legislation requiring businesses that generate organic waste to arrange for recycling services is not enacted in 2014, then Air Resources Board, in concert with CalRecycle, will initiate regulatory action(s) to prohibit/phase out landfilling of organic materials with the goal of requiring initial compliance actions in 2016.
- b. AB 1594 – Green waste used as alternative daily cover would no longer constitute diversion but rather be considered disposal for purposes of AB 939.
- c. AB 1826 – Businesses, governmental entities and multi-family residential of five units and more that generate certain thresholds of organic waste per week would be required to implement a mandatory commercial organics recycling program consistent with the bill.

61-1

2. Chapter 1.0 (Introduction)

1.1.2 Existing Conditional Use Permit (Pg. 1-7). Provide further analysis and discussion, including but not limited to graphs and calculations based on the most current disposal information, to estimate the closure date of the Landfill based on its current CUP.

61-2

3. Chapter 2.0 (Project Description)

- a. 2.2.7.8 Sewage and Water (Pg. 2-18). Address the adequacy of the water supply to accommodate dust control and irrigation even after the development of the Newhall Land and Farming Projects in the vicinity of the Project.

61-3

b. 2.2.9.6 Nuisance and Health Hazard Monitoring, Odor (Pg. 2-35). Elaborate on measures to prevent nuisances due to odors emanating from the Landfill including those related to the working face, leachate, landfill gas control system, and the "Mixed Organics" composting operation.	61-4
4. Chapter 3.0 (General Setting and Resource Area Analysis)	
a. Provide discussion and analysis regarding any existing and proposed residential development within 1,000 feet of the Landfill's disposal footprint. If any enclosed structures are located within 1,000 feet of the disposal footprint identify measures to mitigate any potential landfill gas migration.	61-5
5. Chapter 4.0 (Land Use)	
a. 4.5.3 Planned Surrounding Land Uses (Pg. 4-4). The DEIR needs to acknowledge all existing and proposed residential, educational, and immobile population developments that may be impacted by the proposed Project, and measures to protect public health and safety, and the environment.	61-6
6. Chapter 11.0 (Air Quality)	
a. Provide additional discussion and analyses regarding any potential odor issues that may result from the proposed increase in fill elevation as well as operation of the open Mixed Organics Composting Facility.	61-7
b. 11.9.2.1 Criteria Pollutant Emission Impacts (Pg. 11-37). The DEIR states that impacts to air quality are significant and unavoidable due to water availability concerns for irrigation and dust control. However, discussions in the Section 14.5.2.5 of the DEIR concluded there is a sufficient amount of water that can be used for dust control and irrigation for the Project. Please clarify this discrepancy.	61-8
7. Chapter 14.0 (Public Services and Utilities)	
Please see comment No. 5.b.	

8. Chapter 15.0 (Visual Resources)

Potential impacts to Visual Resources may be significant and unavoidable without mitigation with respect to the proposed Newhall Land and Farming residential development immediately west and south of the Landfill. If potential impacts are significant and unavoidable propose measures to obscure views of the operation of the Landfill from neighboring residents and communities.

61-9

For questions regarding Environmental Programs, please contact Ms. Emiko Thompson at (626) 458-3521 or [ethomp@dpw.lacounty.gov](mailto:ethomp@dpw.lacounty.gov).

**Geotechnical and Materials Engineering**

Include the enclosed document prepared by R.T. Frankian & Associates titled "Clarification of Geotechnical Issues," dated on September 10, 2014, in the Final Environmental Impact Report.

61-10

For questions regarding Geotechnical and Materials Engineering' comments, please contact Mr. Jeremy Wan at (626) 458-7980 or [jwan@dpw.lacounty.gov](mailto:jwan@dpw.lacounty.gov).

**Land Development**

1. Chapter 2.0 (Project Description)

2.2.2 Lateral Extension of the Waste Footprint and Increased Maximum Elevation (Pg. 2-5). This section states that the grading and excavation activities are described in Section 2.2.6.3 of the DEIR. However, such a section does not exist. A description of the proposed grading activities detailing the amount of cut, fill, import, export, and over excavation necessary shall be included in the DEIR. Additionally, if hauling must occur as part of the grading activities, the haul route must be disclosed in the DEIR. Furthermore, Table 2-1 of the DEIR does not adequately detail the amount of earthwork for the Project. As indicated above, the amount of cut, fill, import, export, and over excavation must be shown and must take into account the latest version of the site plan with the proposed household hazardous waste collection area.

61-11

2. Chapter 10.0 (Traffic and Transportation)

a. Figure 10-4 Proposed CCL Entrance Plan (Pg. 10-11). The site plan depicted in Figure 10-4 needs to be replaced with the most recent updated site plan. Please note that the latest site plan to be used for the CUP approval must be reflected in the DEIR.

61-12

b. 10.4.1 Local Road Network (Pg. 10-7). This section should be modified to include a description of Franklin Parkway since the roadway is part of the truck distribution route.

61-13

3. Chapter 14.0 (Public Services and Utilities)

a. 14.4.5 Water Supply (Pg. 14-3). We cannot substantiate the findings of the DEIR on the existing water system at this time. The previous Water Supply Assessment (WSA) dated April 25, 2011, was based on data from the 2005 Urban Water Management Plan prepared for the Santa Clarita Valley. The Urban Water Management Plan was updated in 2010, so the impacts of the proposed Project on the existing water supply cannot be verified until an updated WSA is submitted to Public Works for review and approval. Water mitigations and impacts found in the water assessment, if any, should be reflected on the DEIR. In addition, the WSA is included in the DEIR as Appendix J. However, the text within Section 14.4.5.2 references Appendix H. This reference should be updated accordingly.

61-14

b. 14.4.6 Sewage Disposal (Pg. 14-4). We agree with the findings of the DEIR that there will be less than significant impacts on the existing sewer system since this Project proposes to continue the usage of a septic tank and portable toilets and there is no existing sewer system in close proximity of the Project. However, we recommend that this Project be reviewed by the Los Angeles County Department of Public Health.

61-15

For questions regarding comments under Land Development pertaining to the Project Description and Traffic and Transportation, please contact Mr. Sam Richards at (626) 458-4921 or [srich@dpw.lacounty.gov](mailto:srich@dpw.lacounty.gov). For questions regarding the Public Services and Utilities comments, please contact Mr. Vilong Truong at (626) 458-4921 or [vtruong@dpw.lacounty.gov](mailto:vtruong@dpw.lacounty.gov).

**Traffic and Lighting (Traffic Studies)**

1. Include the enclosed technical memorandum submitted by CH2M Hill dated September 18, 2014, titled "Chiquita Canyon Landfill Master Plan Revision Queuing Analysis" in the Final Environmental Impact Report.

61-16

2. 10.4.3 Existing plus Growth Conditions (Pg. 10-15). Table 10-4, "Summary of Intersection Analysis – Existing plus Growth Conditions" shows a P.M. Peak Intersection Capacity Utilization (ICU) of 0.423 for Intersection 3 (Wolcott Way at SR-126). However, the Traffic Impact Analysis included in Appendix G, Traffic Analysis, of the DEIR shows an ICU of 0.432. Revise to show the correct ICU.

61-17

For questions regarding Traffic Studies' comments, please contact Mr. Andrew Ngumba at (626) 300-4851 or [angumba@dpw.lacounty.gov](mailto:angumba@dpw.lacounty.gov).

**Water Resources**

Submit the latest hydrologic analysis for the Landfill based on Public Works' current hydrology methods and standards. The analysis will be used for the following:

1. Evaluate the adequacy of the spillways of the east and west sedimentation/debris basins based on calculated burned and bulked flow rates.
2. Check the capacity of the existing culvert on SR-126 (County-maintained drainage structure) near the entrance of the Landfill to convey peak outflow from the west sedimentation/debris basin to the Santa Clara River.
3. Verify the adequacy of the Castaic Creek to receive outflow from the east sedimentation/debris basin.

61-18

Ms. Iris Chi  
October 23, 2014  
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For questions regarding Water Resources' comments, please contact Ms. Wai So at  
(626) 458-6342 or [nwaiso@dpw.lacounty.gov](mailto:nwaiso@dpw.lacounty.gov).

Very truly yours,

GAIL FARBER  
Director of Public Works

  
for PAT PROANO  
Assistant Deputy Director  
Environmental Programs Division

KM:dy  
P:\Sec\Chiquita Plan Revision Comment Letter DEIR

Enc.

cc: County of Los Angeles Department of Regional Planning (Richard Bruckner)  
Waste Connections, Inc. (Mike Dean, District Manager)



September 10, 2014

Chiquita Canyon Landfill  
29201 Henry Mayo Drive  
Castaic, California 91384

Job No. 2002-036-004

Attention: Mr. Michael Dean  
Division Vice President

Subject: Clarification of Geotechnical Issues  
Master Plan Revision  
Chiquita Canyon Landfill  
29201 Henry Mayo Drive  
Castaic, California

Reference: See Attached References

Gentlemen:

This submittal provides clarification of geotechnical issues discussed with the County of Los Angeles Department of Public Works, Geotechnical and Materials Engineering Division (GMED). The information provided was requested by GMED personnel in a phone conversation on September 3, 2014, to address issues related to GMED's review of the Chiquita Canyon Landfill (CCL) Master Plan Revision (MPR) Draft Environmental Impact Report. The geotechnical information presented in this letter is based on the CCL *Proposed Project Excavation Plan* for the MPR, prepared by Golder Associates (Golder) and dated April 30, 2014, and clarifies previous data included in the referenced R. T. Frankian & Associates (RTF&A) 2012 and 2014 geotechnical reports and provides additional requested evaluation.

The geotechnical issues requiring clarification relate to: 1) liquefaction potential beneath Alternative 1 and 2 Facilities; 2) the stability of proposed Cut Slope CS-7 (as depicted on

Geotechnical Section S5-S5') under seismic conditions; 3) the stability of proposed Cut Slope CS-18 (as depicted on Geotechnical Section S23-S23') under seismic conditions; and 4) surficial stability of cut slopes exposing Pico Formation bedrock materials, Saugus Formation bedrock materials, and compacted fill materials.

Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable geotechnical engineers and geologists practicing in this or similar localities. No other warranty, expressed or implied, is made as to the professional advice included in this report. This report has been prepared for CCL and their design consultants, to be used solely for planning and design of the MPR and associated grading.

#### **LIQUEFACTION POTENTIAL**

The California Geological Survey (formerly California Division of Mines and Geology) has published maps showing potential liquefaction areas that must be evaluated prior to development for habitable structures. Alternative 1 Facilities is located on Saugus Formation bedrock units, and Alternative 2 Facilities is located on engineered fill underlain by Saugus Formation bedrock. No alluvial materials, or other materials historically susceptible to liquefaction potential, underlie either site. Therefore, the potential for liquefaction occurring beneath Alternative 1 and 2 Facilities is considered very low.

#### **CUT SLOPE CS- 7 SEISMIC STABILITY**

Cut Slope CS-7 will be graded as a southeast- to southwest-facing, 2:1 to 3:1 slope. The total slope height is approximately 205 feet, with the upper (permanent) portion of the cut slope approximately 35 feet high and the lower (lined) portion of the slope 170 feet high. The cut slope will encounter Saugus Formation units and landslides QIs G through QIs I, and QIs L. Bedding in the underlying Saugus Formation strikes from north-south to northeast, with easterly dips between 20 and 40 degrees. As indicated on Geotechnical Section S5-S5' (Figure 1), a

daylighted bedding component of 17 degrees will be exposed in the cut slope. It is anticipated that grading of Cut Slope CS-7 will remove landslides Qls G through Qls I, and Qls L. If any landslide debris remains after completion of the cut slope, the debris should be removed and certified engineered fill placed to restore grade.

Cut Slope CS-7 has the potential to exist for an extended period of time and has a potential bedding plane that extends beyond the Chiquita Canyon Landfill property limit. Accordingly, a static factor of safety of 1.5 and a seismic factor of safety of 1.1 are required by GMED. As presented in the MRP report (RTF&A, 2012b), the static factor of safety is greater than 1.25, but is less than 1.5. Slope stability calculations were performed for a buttress shear key design that meets the GMED slope stability static factor of safety requirements of 1.5 as presented in the referenced 2014 Geotechnical Report. As recently requested, we performed seismic slope stability analysis using Bishop's Method for Cut Slope CS-7 after construction of the recommended shear key. The slope stability calculations were performed using the shear strength parameters presented in the referenced reports and the computer program Slope/W. The proposed buttress shear key and the slope stability results that exceed a static factor of safety of 1.5 for static conditions and 1.1 for pseudostatic conditions are shown on Geotechnical Section S5-S5', and the static and seismic slope stability calculations are presented in the Appendix.

#### **CUT SLOPE CS-18 SEISMIC STABILITY**

Cut Slope CS-18 is planned as a 200-foot-high, east-facing, permanent, 2½:1 slope on the west side of the proposed South Main Canyon stormwater basin. The cut slope is underlain by Saugus Formation units in which the underlying bedding strikes northwest to northeast and dips 9 to 32 degrees to the east. As depicted on Geotechnical Section S23-S23', easterly-dipping bedding ranging from 10 to 17 degrees will be exposed in the planned 2½:1 cut slope. A portion of landslide Qls A will encroach into CS-18. The landslide should be removed and replaced with compacted fill, as necessary, to obtain proposed slope grades. Stability analyses performed for potential failure along the adversely-dipping bedding indicate that proposed Cut Slope CS-18

Chiquita Canyon Landfill  
September 10, 2014  
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meets the GMED static and pseudostatic factor of safety requirements of 1.5 and 1.1, respectively. Static and seismic slope stability calculation for three potential failure planes are presented in the Appendix.

#### **SURFICIAL SLOPE STABILITY**

Surficial slope stability calculations were performed for 2:1 compacted fill, Saugus Formation (QTs) slopes, and Pico Formation (Tp) slopes, and are in excess of a factor of safety of 1.5 with a saturation depth of 4 feet as required by GMED. The surficial slope stability calculations are presented in the Appendix.

#### **SECTION 111 STATEMENT**

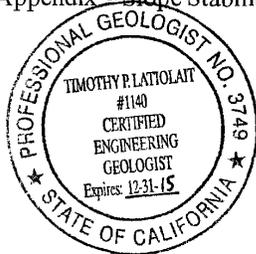
Based on our review of the 2014 MPR Project Excavation Plan and the referenced reports, it is our professional opinion that the proposed MPR development will be safe from hazard of landslide, settlement, or slippage and will not adversely affect the geotechnical conditions of off-site properties, provided our recommendations and the requirements of the Los Angeles County Building Code are followed.

-o0o-

Chiquita Canyon Landfill  
September 10, 2014  
2002-036-004  
Page 5

The following are attached and complete this report.

- Table A – Summary of Slope Stability Calculations
- Geotechnical Sections, Figure 1
- Appendix – Slope Stability Calculations



Respectfully submitted,

R. T. FRANKIAN & ASSOCIATES

by: Timothy P. Latiolait  
Principal Engineering Geologist



and:   
Alan W. Rasplicka  
Principal Geotechnical Engineer

TPL/AWR/eaw

Distribution: (2) Chiquita Canyon Landfill (plus PDF via email and CD)  
1 - Attn: Mr. Michael Dean  
1 - Attn: Mr. Steve Cassulo  
(1) Law Offices of Scott Gordon (PDF via email)  
Attn: Mr. Scott Gordon  
(2) CH2M Hill (plus PDF via email and CD)  
Attn: Ms. Colleen Bredensteiner  
Attn: Ms. Brenda Eells

## REFERENCES

- California Division of Mines and Geology, 1997, "Seismic Hazard Zone Report for the Newhall 7.5-Minute Quadrangle, Los Angeles County, California."
- California Geological Survey, 2002, "Seismic Hazard Zone Report for the Val Verde 7.5-Minute Quadrangle, Los Angeles and Ventura Counties, California," Seismic Hazard Zone Report 076.
- Frankian, R. T., & Associates, 2012a, "Geotechnical Investigation, Landfill Entrance Road, Chiquita Canyon Landfill, 29201 Henry Mayo Drive, Castaic, California," for Chiquita Canyon Landfill, dated January 13, 2012, Job No. 2002-036-006.
- Frankian, R. T., & Associates, 2012b, "Geotechnical Investigation, Master Plan Revision, Chiquita Canyon Landfill, Castaic, California," for Chiquita Canyon Landfill, dated January 27, 2012, Job No. 2002-036-004.
- Frankian, R. T., & Associates, 2014, "Geotechnical Evaluation of Updated Excavation Plan, Master Plan Revision, Chiquita Canyon Landfill, 29201 Henry Mayo Drive, Castaic, California," for Chiquita Canyon Landfill, dated May 23, 2014, Job No. 2002-036-004.

**TABLE A**  
**SUMMARY OF SLOPE STABILITY CALCULATIONS**  
**Master Plan Revision**

CUT SLOPE	FIGURE NO.	SLOPE GRADIENT	SLOPE HEIGHT (total/permanent)	SLOPE FACE DIRECTION	GEOLOGIC MATERIALS	GEOLOGIC SECTION	GEOLOGIC STABILITY	FACTOR OF SAFETY (Static/Seismic)
CS-1	1.1	2:1	300/200'	S to SE	Tp	S11-S11'	Bedding dipping steeper than slope gradient; grossly stable	Static = 1.63, Seismic = 1.16
CS-2	1.1	2:1	150/80'	SSE	Tp	S12-S12'	Bedding dipping steeper than slope gradient; grossly stable	Slope stable; analyses not performed
CS-3a	1.1	2:1	220/175'	ESE	Tp	S13-S13', S26-S26'	Bedding dipping parallel to or steeper than slope gradient; grossly stable	Slope stable; analyses not performed
CS-3b	1.1	2:1	75/0	ESE	Tp	S26-S26'	Bedding dipping steeper than slope gradient; grossly stable	Slope stable; analyses not performed
CS-4	1.1	2:1 to 4:1	210/120'	SE	Tp, Qls E, Qls F, af	S16-S16'	Bedding dipping parallel to or steeper than slope gradient; grossly stable	Slope stable; analyses not performed
CS-5	1.1	2:1 to 3:1	120/30'	SE to S	Tp, Qls F, af	S15-S15', S24-S24'	Daylighted bedding; stable by analyses	Static = 2.35 (See 1-27-12 Report)
CS-6	1.1	2½:1 to 3:1	290/95'	SSE	Tp, Qls, Qls H-J	S17-S17', S20-S20'	Daylighted bedding; stable by analyses	Section S17 Static = 1.31, S20 Static = 1.34 (Sec 1-27-12 Report)
CS-7	1.1	2:1 to 3:1	205/35'	SE to SW	Qls, Qls G - I, & L, af	S5-S5'	Daylighted bedding; stable by analyses	Static = 1.62, Seismic = 1.12 after shear key construction
CS-8	1.1	2:1	225/75'	SW	Qls	---	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-9	1.1	2:1	150/0	S	Qls, Qls A, Qls N, Qls O	S19-S19'	Daylighted bedding; slope stable by analyses	Section S19 Static = 1.29 (See 1-27-12 Report)
CS-10	1.1	2:1	185/75'	SW	Qls	S2-S2'	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-11	1.1	2:1	150/65'	WSW	Qls	S1-S1'	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-12	1.1	2:1	100/100'	NW and SE	Qls, Qls P	S21-S21'	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-13	1.1	2:1	50/50'	SW	Qls	---	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-14	1.1	2:1	20/20'	SW	Qls	---	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-15	1.1	2:1	50/50'	SW	Qls	---	Favorable bedding; grossly stable	Slope stable; analyses not performed

**TABLE A**  
**SUMMARY OF SLOPE STABILITY CALCULATIONS**  
**Master Plan Revision**

CUT SLOPE	FIGURE NO.	SLOPE GRADIENT	SLOPE HEIGHT (total/permanent)	SLOPE FACE DIRECTION	GEOLOGIC MATERIALS	GEOLOGIC SECTION	GEOLOGIC STABILITY	FACTOR OF SAFETY (Static/Seismic)
CS-16	1.1	2:1	110/0	NW	QTs	---	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-17	1.2	2:1	160/160'	S	QTs, Qi	S22-S22, S27-S27'	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-18	1.2	2:1	200/200'	E	QTs, Qls A	S23-S23'	Daylighted bedding; stable by analyses	Lowest Static = 1.74, Lowest Seismic = 1.19 (See this report)
CS-19	1.1	2:1	50/50'	WSW	QTs	---	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-20	1.2	2:1	30/30'	SE	QTs, Qi	---	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-21	1.2	2:1	85/85'	W	QTs	---	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-22	1.2	2:1	100/100'	SSE	QTs	---	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-23	1.1	2:1	85/0	ENE to E	Tp, QTs	---	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-24	1.2	2-1/2:1	235/60'	E to N	QTs, afs	---	Bedding dipping steeper than slope gradient; grossly stable	Slope stable; analyses not performed
CS-25	1.1	2:1	35/35'	SE	Tp	---	Bedding dipping steeper than slope gradient; grossly stable	Slope stable; analyses not performed
CS-26	1.2	2:1	85/85'	SW	QTs	---	Favorable bedding; grossly stable	Slope stable; analyses not performed
CS-27	1.2	2:1	75/75'	SW	QTs	---	Favorable bedding; grossly stable	Slope stable; analyses not performed
Fill Slope	1.2	2:1	130'	E	ccf	---	N/A	Static = 1.56, Seismic = 1.14 (See 1-27-12 Report)
Fill Slope (surficial)	N/A	2:1	N/A	N/A	ccf	---	N/A	Factor of Safety at 4' Saturation Depth = 2.30
Cut Slope (surficial)	N/A	2:1	N/A	N/A	Tp	---	N/A	Factor of Safety at 4' Saturation Depth = 3.04
Cut Slope (surficial)	N/A	2:1	N/A	N/A	QTs	---	N/A	Factor of Safety at 4' Saturation Depth = 3.68



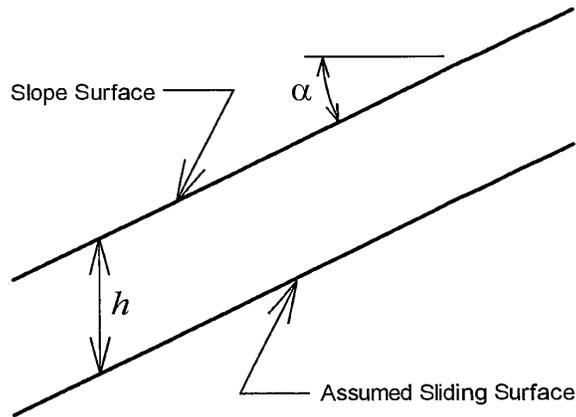
Chiquita Canyon Landfill  
September 10, 2014  
2002-036-004

**APPENDIX**  
**SLOPE STABILITY CALCULATIONS**

Client: Chiquita Canyon Landfill  
 Job No.: 2002-036

By: AWR  
 Date: 09/09/14 Time: 14:43:40

Subject: Surficial Slope Stability Compacted Fill



$$f.s. = \frac{C + h(\gamma_t - \gamma_w)(\cos^2 \alpha)(\tan \phi)}{\gamma_t h (\sin \alpha)(\cos \alpha)}$$

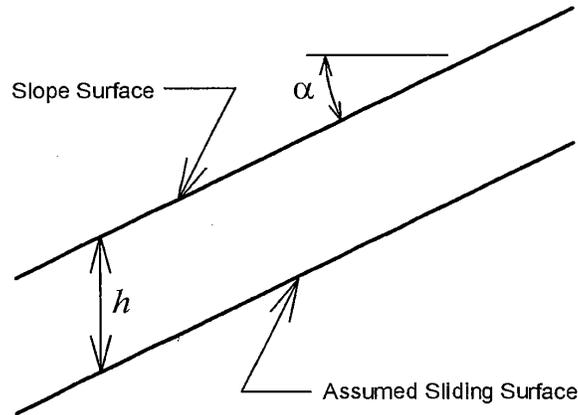
$\alpha =$	27 degrees	0.471 radians	$\gamma =$	125 pcf (total)
$C =$	350 psf		$\gamma =$	62.4 pcf (water)
$\phi =$	30.0 degrees	0.524 radians		

Depth of Saturation $h$ (feet)	Factor of Safety $f.s.$
1	7.49
2	4.03
3	2.87
>>>>>> 4	2.30 <<<<<<

Client: Chiquita Canyon Landfill  
 Job No.: 2002-036

By: AWR  
 Date: 09/09/14 Time: 14:02:02

Subject: Surficial Slope Stability Compacted QTs



$$f.s. = \frac{C + h (\gamma_t - \gamma_w) (\cos^2 \alpha) (\tan \phi)}{\gamma_t h (\sin \alpha) (\cos \alpha)}$$

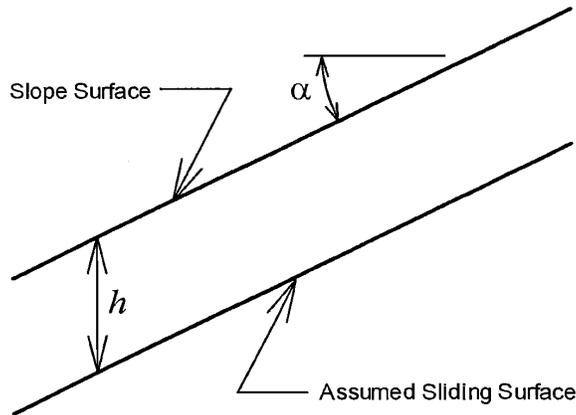
α = 27 degrees      0.471 radians      γ = 125 pcf (total)  
 C = 600 psf      γ = 62.4 pcf (water)  
 φ = 36.0 degrees      0.628 radians

Depth of Saturation <i>h</i> (feet)	Factor of Safety <i>f.s.</i>
1	12.58
2	6.65
3	4.67
>>>>>> 4	3.68 <<<<<<

Client: Chiquita Canyon Landfill  
 Job No.: 2002-036

By: AWR  
 Date: 09/09/14 Time: 14:04:51

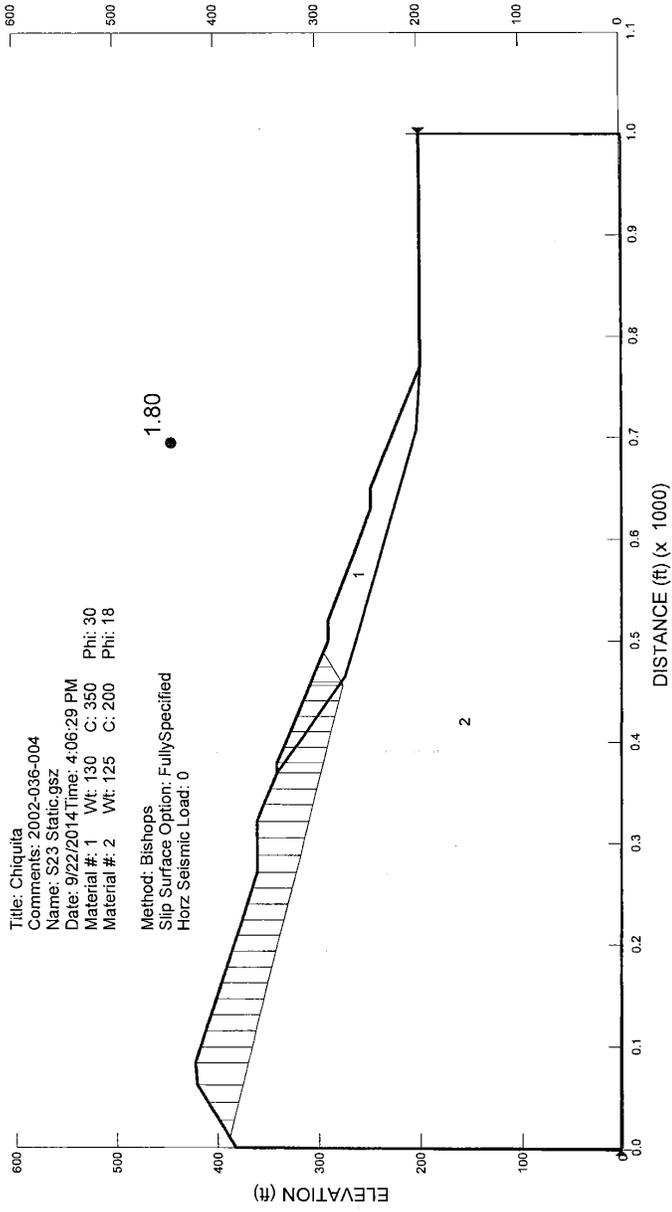
Subject: Surficial Slope Stability Tp



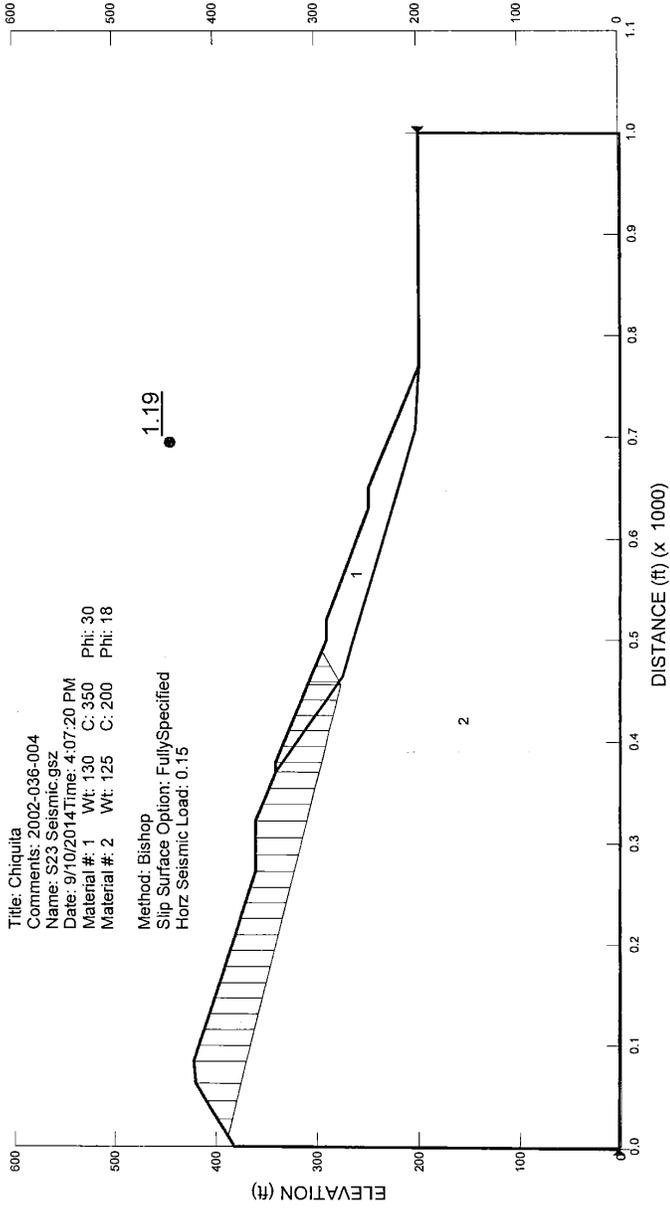
$$f.s. = \frac{C + h (\gamma_t - \gamma_w) (\cos^2 \alpha) (\tan \phi)}{\gamma_t h (\sin \alpha) (\cos \alpha)}$$

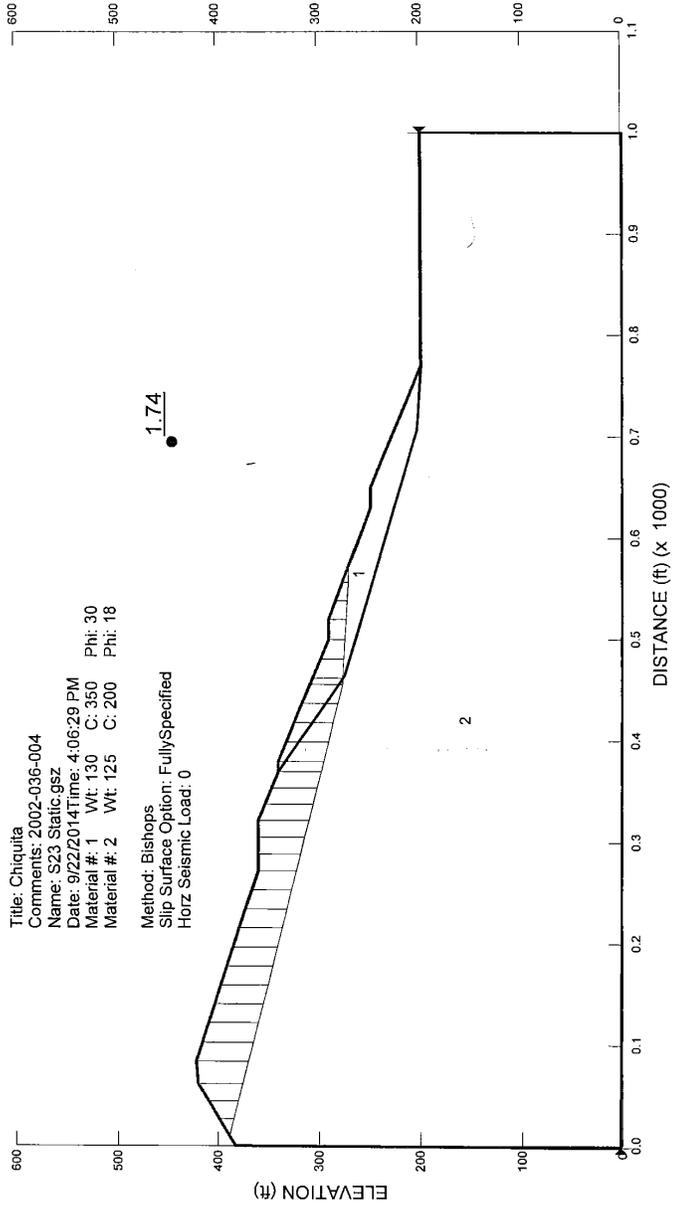
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 $C =$  500 psf       $\gamma =$  62.4 pcf (water)  
 $\phi =$  30.0 degrees      0.524 radians

Depth of Saturation <i>h</i> (feet)	Factor of Safety <i>f.s.</i>
1	10.46
2	5.51
3	3.86
>>>>>> 4	3.04 <<<<<<

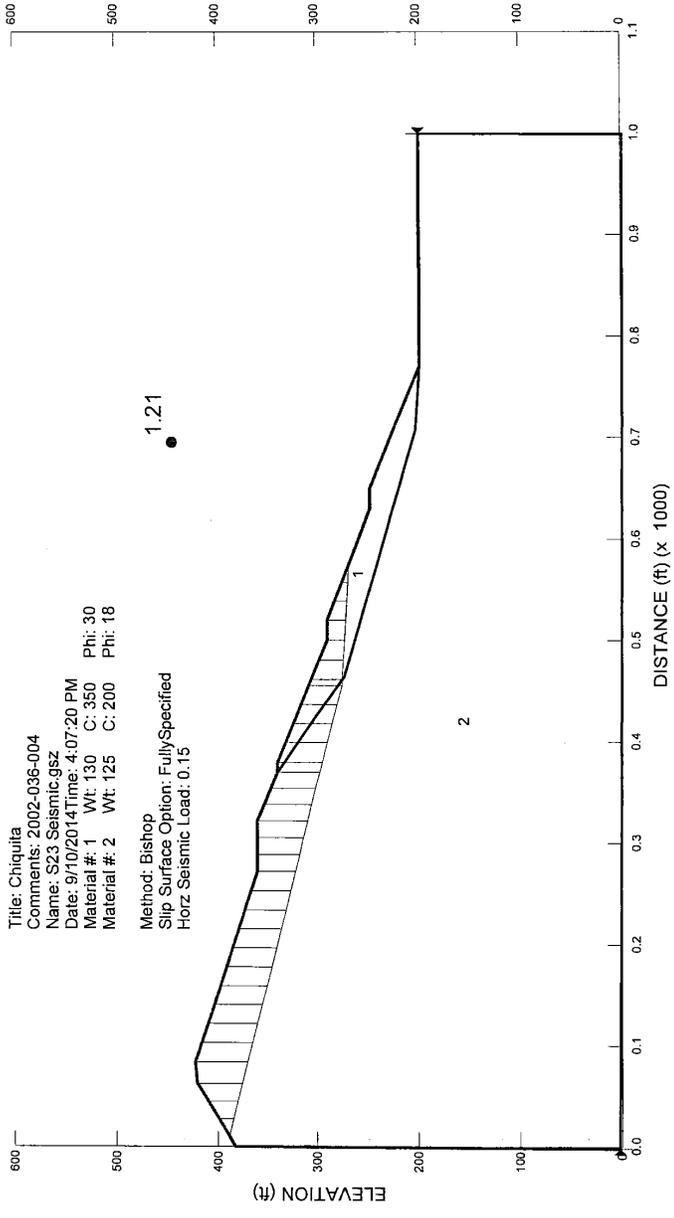


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 Material #: 2 Wt: 125 C: 200 Phi: 18  
 Method: Bishops  
 Slip Surface Option: FullySpecified  
 Horz Seismic Load: 0

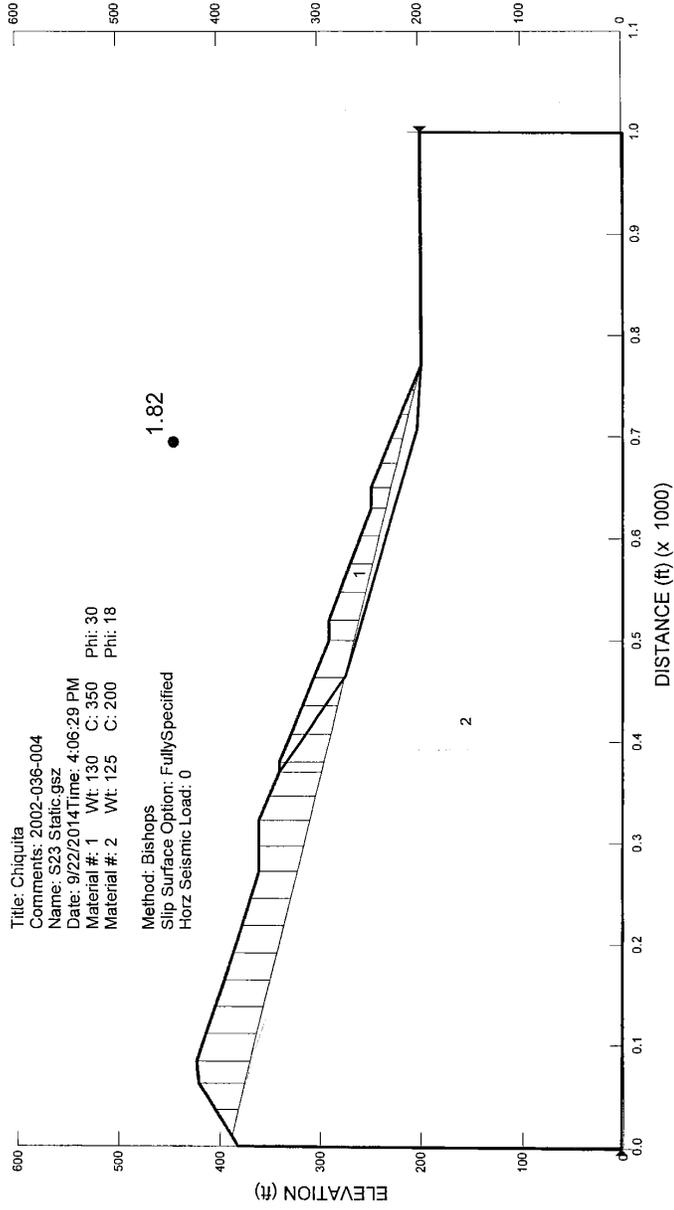




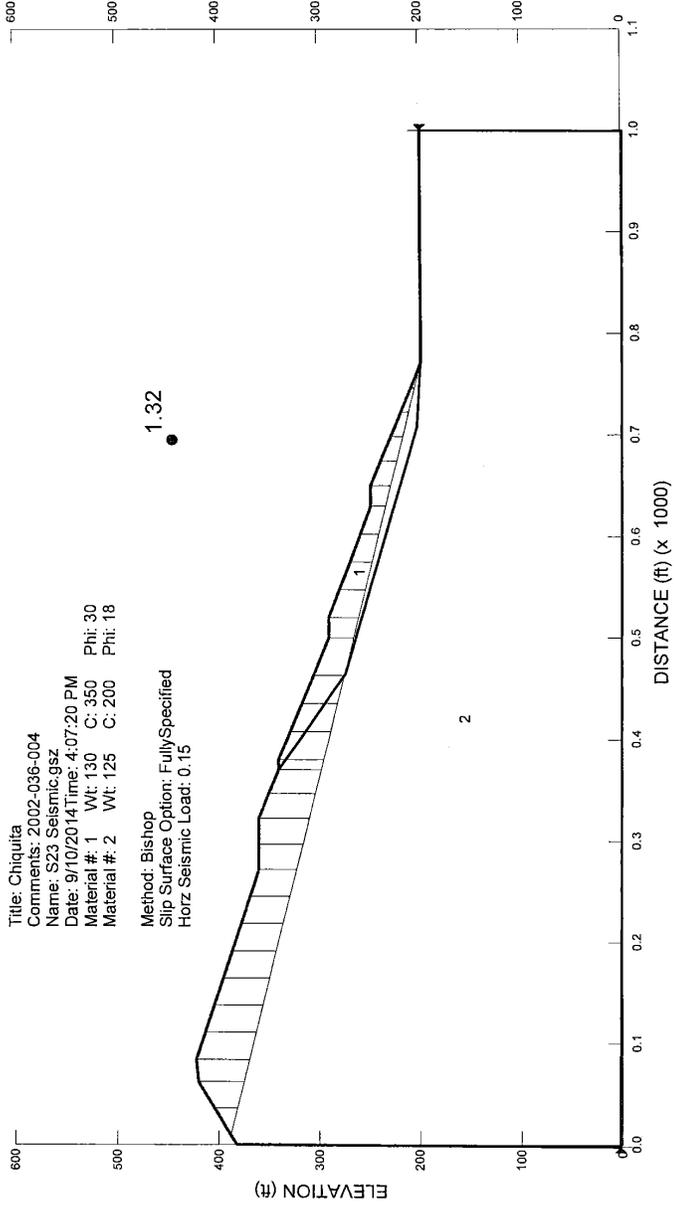
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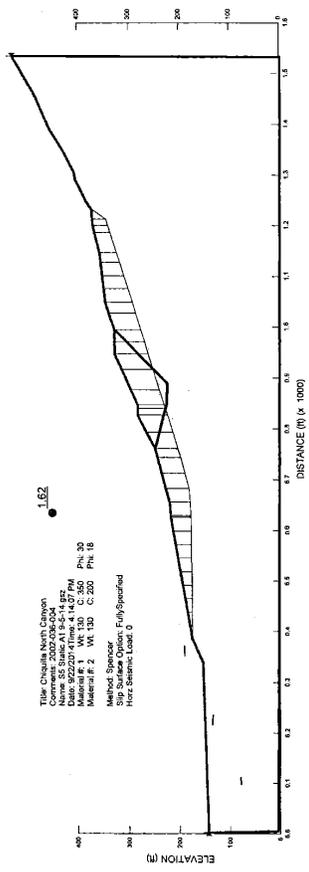
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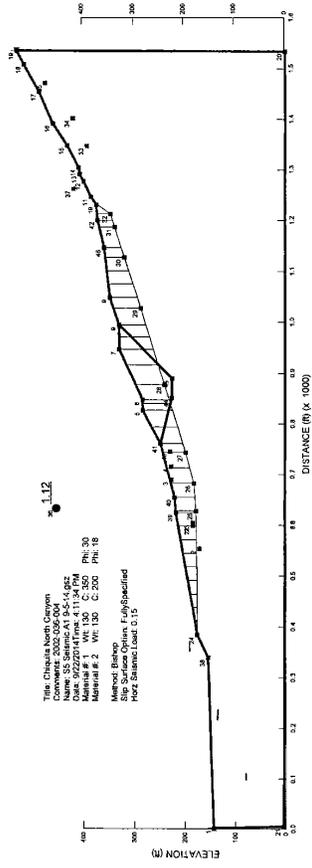


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 Slip Surface Option: FullySpecified  
 Horiz Seismic Load: 0.15





## Chiquita Canyon Landfill Master Plan Revision Queuing Analysis

**TO:** Los Angeles County Department of Public Works  
**COPIES:** Mike Dean, Steve Cassulo, Brenda Eells  
**FROM:** Jim Roldan  
**DATE:** September 18, 2014

### Introduction

The Chiquita Canyon Landfill (CCL) Master Plan Revision (Proposed Project) is a proposal to extend the waste footprint at the existing CCL facility located in the northwestern portion of unincorporated Los Angeles County. A Draft Environmental Impact Report (DEIR) was prepared in July 2014 and addresses the potential environmental impacts of the Proposed Project. Specifically, the potential traffic impacts related to the Proposed Project were evaluated in the *CCL Master Plan Revision Traffic Analysis*, (CH2M HILL, 2014) and provided as Appendix G of the DEIR.

A queuing analysis of the new project entrance was performed as part of the *CCL Master Plan Revision Traffic Analysis*. At the request of the Los Angeles County Department of Public Works, this technical memorandum provides a supplemental analysis of the available storage for queuing within the new site entrance adjacent to Wolcott Way. This memorandum includes evaluating the potential queue based on two scenarios:

- estimated number of inbound truck trips based on the peak project trip generation (2,105 trips) and
- estimated number of inbound truck trips based on actual gate receipt data for the existing landfill operations (785 trips).

### Project Location and Access

CCL is located on the north side of SR-126, a four-lane highway running east-west along the southern boundary of CCL. The Proposed Project will remove the existing CCL entrance, which is located on SR-126 between Chiquita Canyon Road and Wolcott Way, and construct a new entrance on the corner of Wolcott Way and Franklin Parkway (see Figure 1). It is assumed that the intersection of Wolcott Way and Franklin Parkway will operate as an all-way stop controlled intersection.

The new entrance of the CCL facility will bring vehicles to the site from the Wolcott Way/Franklin Parkway intersection. Vehicles will enter the site and drive westbound to the scales and gatehouses located approximately 900 feet west of the Wolcott Way/Franklin Parkway intersection. A queuing analysis was performed to confirm that the projected project-related traffic will not queue through this intersection.

## Project Trip Generation and Vehicle Mix

As part of the Proposed Project, the permitted maximum daily disposal tonnage will increase from 6,000 to 12,000 tons per day (tpd). The projected project traffic based on the tonnage increase is summarized in Table 1 (included in the DEIR as Table 2-4) and includes inbound trash (disposal) and other materials (beneficial reuse) trips, outbound trips, special projects-related trips, and employee-generated trips.

As shown in Table 1, the Proposed Project is estimated to have a peak daily trip generation of 3,490 trips.

TABLE 1  
**Summary of Net Change in Peak Potential Daily Inbound and Outbound Traffic with Proposed Project**

Traffic Source	Peak Potential Daily Number of Vehicles <sup>a, b</sup>		
	Proposed	Baseline	Net Change
<b>Inbound</b>			
<i>Trash (Disposal)<sup>c</sup></i>			
Transfer	545	273	272
Route	600	300	300
Roll-offs	460	460	0
Self Haul	500	500	0
<i>Other Materials (Beneficial Reuse)</i>			
Shredded Curbside Green Waste	40	40	0
Clean Soil	200	200	0
<i>Contaminated Soil<sup>d</sup></i>			
Large Trucks	300	300	0
10-Wheelers	60	60	0
<i>Protective Cover</i>			
TASW	200	200	0
MRF Fines	40	40	0
Tire Shred	15	15	0
C&D Fines	25	25	0
<i>Road Base</i>			
Concrete	50	50	0
Asphalt	50	50	0
Processed C&D Material	30	30	0
Composting <sup>e</sup>	55	55	0
<b>Outbound</b>			
Clean Soil	100	100	0
Compost Products	8	8	0
Other	25	25	0
<b>Special Projects<sup>f</sup></b>			
<i>Cell Construction</i>			
Mobilize/Demobilize Traffic	20	20	0
Contractor Employees	80	80	0

**TABLE 1  
Summary of Net Change in Peak Potential Daily Inbound and Outbound Traffic with  
Proposed Project**

Traffic Source	Peak Potential Daily Number of Vehicles <sup>a, b</sup>		
	Proposed	Baseline	Net Change
<b>Employees</b>			
Landfill – Permanent	55	34	21
Landfill – Temporary	25	25	0
LFGTE Plant	3	2	1
Transfer Drivers	4	4	0
<b>Total</b>	<b>3,490</b>	<b>2,896</b>	<b>594</b>

<sup>a</sup> These numbers represent one-way trips, based on 5 days per week.

<sup>b</sup> The maximum number of trash vehicles in each category does not happen simultaneously. The daily maximum disposal tonnage would not exceed 12,000 tons per day.

<sup>c</sup> Regardless of actual vehicle mix, incoming disposal tonnage would not exceed 12,000 tons per day.

<sup>d</sup> Contaminated soils may also be disposed and not put to beneficial reuse.

<sup>e</sup> The existing CUP allows for operation of up to a 560-tons-per-day composting facility for windrow or in-vessel technology composting operation.

<sup>f</sup> These projects occur periodically, typically once every 2 to 3 years.

Notes:

MRF = Material Recovery Facility

TASW = treated auto shredder waste

C&D = construction and demolition

### Trips Excluded from Queuing Analysis

CCL is permitted to be open 24 hours per day, 6 days per week. This provides CCL the operational flexibility to coordinate with customers and arrange to be open when loads are anticipated. Therefore, there are never extended periods of time when vehicles would not be processed through the scales and forced to queue without release. In addition, the maximum number of trash vehicles in each category (shown in Table 1) does not happen simultaneously.

With the exception of inbound trash-related (disposal) trips, all other trips, including the inbound trips associated with beneficial reuse, special construction-related trips and employee-generated trips can be directed by landfill staff to arrive and depart at the landfill at specified periods of the day. In particular, these vehicles can be directed to avoid the peak hour(s) of landfill operation. Therefore, these scheduled trips were excluded from the queuing analysis. A description of each trip category is provided below.

#### Inbound Other Materials (Beneficial Reuse)

Beneficial reuse materials that may be delivered to the landfill include, but not limited to, shredded curbside green waste, clean soil, contaminated soil, treated auto shredder waste, compost, and other materials. A maximum of 1,065 vehicles per day are associated with these materials.

#### Outbound Trips

Outbound vehicles do not cross the scale and would utilize the by-pass lane. A maximum of 133 vehicles per day are associated with this category.

### Special Projects

Special Projects vehicles are those required for landfill cell construction. A maximum of 100 vehicles per day are associated with this activity, which would occur every 18 months to 5 years during the life of the project. Special Projects vehicles do not cross the scale and would utilize the by-pass lane.

### Employees

A maximum of 87 vehicles per day are associated with landfill employees. These vehicles are anticipated to utilize the site entrance at the beginning and end of each day and not arrive/depart during the peak hour(s) of landfill operation. Further, employee vehicles would not cross the scale and would utilize the by-pass lane.

### Queuing Analysis

The queuing analysis evaluates all inbound trash-related (disposal) trips since these are the only trips that arrive at unscheduled times. The potential queue at the new entrance was analyzed based on two scenarios:

- estimated number of inbound truck trips based on the peak project trip generation (2,105 trips) and
- estimated number of inbound truck trips based on actual gate receipt data for the existing landfill operations (785 trips).

The first scenario conservatively assumes that the maximum number of trash-related (disposal) vehicles (shown in Table 1) arrives in one day. However, the total number of maximum vehicles on any given day will likely be different than the trip generation numbers because the mix of vehicles to reach the maximum tonnage will vary. Therefore, the existing gate receipt information was also used to project the number of inbound trash disposal trucks that will be experienced with the expansion.

The results of the queue calculations for the projected CCL traffic for each scenario are summarized in Tables 4 through 7 provided at the end of this memorandum. The queuing calculations are based on the same assumptions used in the *CCL Master Plan Revision Traffic Analysis* (Appendix G of the DEIR) and include the following assumptions:

- The distance between the Wolcott Way and the limit line where vehicles must wait to enter the scales is 900 feet.
- There are two lanes of storage between the limit line where vehicles must wait to enter the scales and Wolcott Street (site entrance). The two lanes provide a total of 1,800 feet of storage.
- A third lane extends from the limit line to approximately 480 feet east.
- A fourth lane extends from the limit line to approximately 290 feet east.
- A fifth lane extends from the limit line to approximately 200 feet east.
- A sixth lane extends from the limit line to approximately 130 feet east.
- The combined storage of the six lanes is 2,900 feet.
- The average vehicle length is assumed to be 50 feet (truck).
- The proposed entrance can store 58 vehicles (50 feet per vehicle) at any given time.
- Based on historical gate receipt data, the average wait time at the scales is 1 minute per vehicle.

- The proposed entrance will have four scales on opening day and eventually six scales, one for each lane, if needed in the future. Each scale can process 60 vehicles per hour based on historical data. On opening day, the Proposed Project entrance would have the capability to process approximately 240 vehicles per hour (4 vehicles per minute).
- CCL is permitted to be open 24 hours per day, 6 days per week. Tables 4 through 7 do not show trips between 6:00 p.m. and 3:00 a.m.; however, historically, there have been trips during this time period for beneficial use and special projects. If needed, CCL could serve customers during this time as well.
- The vehicle arrival rate is spread out over the course of each hour.

**Queuing Analysis of Estimated Peak Project Trip Generation (2,105 inbound trash disposal trips)**

Vehicle trips associated with delivery of 12,000 tpd of municipal solid waste will consist of a combination of transfer, route, roll-off, and self-haul vehicles. The vehicle mix will vary daily. For the purposes of the queuing analysis, the inbound trash disposal trips were extrapolated from Table 1 and summarized in Table 2. There would be an estimated maximum of 2,105 inbound trash disposal vehicles associated with the Proposed Project.

TABLE 2  
Peak Potential Daily Number of Inbound Trash (Disposal) Vehicles

Vehicle Type	Number of Vehicles per Day
Transfer	545
Route	600
Roll-off	460
Self-Haul	500
<b>Total</b>	<b>2,105</b>

The queuing calculations for the projected inbound trash disposal trips (2,105 trips) are summarized in Table 4 at the end of this memorandum. The analysis shows that the new CCL entrance will provide sufficient storage that will accommodate the anticipated queue during all hours of the day. Between 11:30 a.m. and noon, there is a projected queue of 100 feet. This is the longest queue projected throughout the day and is easily accommodated by the 2,900 feet of storage provided by the new CCL entrance.

**Queuing Analysis based on Actual Gate Receipt Data (785 inbound trash disposal trips)**

CCL reviewed 2014 to-date gate receipts for days when the inbound trash disposal volume was near the Conditional Use Permit (CUP) limit of 6,000 tpd. The five days with the highest trash disposal volume were reviewed to determine the number of vehicles required to achieve the waste volume on each day. Using the existing gate receipt data, the number of inbound trash disposal vehicles was projected for the Proposed Project. A peak of 785 inbound vehicles is estimated for the Proposed Project (Table 3), using the lowest (most conservative) average ton per vehicle calculation. Transfer trucks carry a higher volume of waste than other truck types listed in Table 1. According to CCL personnel, the reason why so many fewer vehicles are estimated to be required for the Proposed Project than initially projected (Table 1) is because a higher number of trucks actually arriving at the site are transfer trucks, effectively reducing the number of vehicles required to achieve 12,000 tpd.

**TABLE 3**  
**Projected Inbound Trash Disposal Trips based on Existing Gate Receipts**

Date	Existing (2014) Inbound Vehicles <sup>a</sup>			Projected Inbound Vehicles for 12,000tpd <sup>b</sup>
	Tons	Vehicle Count	Average Tons per Vehicle	
January 13, 2014	5,534	358	15.46	776
January 14, 2014	5,962	359	16.61	723
January 15, 2014	5,662	346	16.36	733
February 20, 2014	5,194	339	15.32	783
April 30, 2014	5,751	376	15.29	785

<sup>a</sup> Vehicle count based on existing gate receipts for 2014.

<sup>b</sup> Inbound vehicles projected based on an equivalent of 12,000 disposal tons per day

The queuing calculations for the projected CCL traffic based on existing gate receipts (785 trips) are summarized in Table 5 at the end of this memorandum. The analysis shows that there is no projected queue based on the projected number of vehicles arriving to the site throughout the day.

**Queuing Analysis of Estimated Peak Project Trip Generation Plus Beneficial Reuse Trips**

A queuing analysis was also performed to determine whether all of or a portion of the beneficial reuse-related trips (1,065 trips as shown in Table 1) could be accommodated in the off-peak hours in addition to the inbound trash disposal trips, for each scenario. Table 6 summarizes the queuing calculations for the estimated peak project trash disposal trip generation and shows the remaining capacity by hour for non trash disposal trips (without forming a queue). As previously noted, using the estimated peak project trips, there is only 1 hour when the number of vehicles arriving to the CCL gates is greater than the rate at which the operators can process them at the gate. This leads to a queue of 100 feet between 11:30 and noon which is easily accommodated within the 2,900 feet of storage provided at the new CCL entrance. Therefore, there is additional capacity available at all times of the day (including between 11:30 a.m. and noon because there is an additional 2,800 feet of storage available) and there are nine hours of the day when 100 percent of the storage capacity is available. Sufficient capacity exists during all remaining hours to accommodate the estimated peak project trip generation plus beneficial reuse trips based on the current vehicle distribution (arrival times throughout the day). The beneficial reuse trips would be scheduled by CCL to arrive outside of the peak hour(s) when storage capacity is available.

**Queuing Analysis based on Gate Receipts Plus Beneficial Reuse Trips**

Table 7 summarizes the queuing calculations for the projected project trash disposal traffic and shows the remaining capacity by hour for non trash disposal trips (without forming a queue). The analysis indicates that the project entrance can accommodate the projected project traffic plus beneficial reuse trips. Additional capacity is available during every hour of the day. The beneficial reuse trips would be scheduled by CCL to arrive outside of the peak hour(s) when storage capacity is available.

**Summary**

It is anticipated that the storage provided at the new CCL entrance will easily be able to accommodate the projected number of vehicles arriving to the site throughout the day and will provide enough

storage to accommodate projected CCL traffic without queuing onto public roadways. This is based on the following reasons:

- CCL is permitted to be open 24 hours per day, 6 days per week. This provides CCL the operational flexibility to coordinate with customers and arrange to be open when loads are anticipated.
- Nearly 40 percent of project trips can be scheduled outside of peak hours or are trips that are not required to cross the scales, including inbound trips associated with beneficial reuse, outbound trips, special construction-related trips and employee-generated trips.
- Four scales will be provided on opening day, which would allow CCL to process 240 vehicles per hour. However, the site entrance has been designed with six lanes, each of which could have a scale, which would allow CCL to process up to 360 vehicles per hour if needed in the future.
- The inbound trash disposal trips (analyzed in the queue) are generally spread throughout a fifteen-hour period.
- Based on historical gate information, it is unlikely that the Proposed Project will generate 2,105 peak inbound trash disposal trips in a single day. This is because the mix of vehicles to reach the maximum tonnage will vary, and consistent with existing operations, there will likely be more transfer trucks arriving at the site, effectively reducing the number of vehicles required to achieve 12,000 tpd.
- Using the projected trip estimate based on actual gate receipts (785 trips) the storage provided will be able to accommodate the projected number of trash disposal vehicles at all times of the day. At the peak arrival (90 vehicles), there is still capacity for an additional 150 vehicles. There are also nine hours of the day when 100 percent of the storage capacity is available.
- The project entrance has sufficient storage to accommodate the peak inbound trash disposal trips (for both scenarios) plus 100 percent of the beneficial reuse trips. This is because additional capacity is available nearly every hour of the day.

**TABLE 4**  
**Summary of Queuing Analysis of Estimated Peak Project Trip Generation (2,105 inbound trips) at New Chiquita Canyon Landfill Entrance on Opening Day (4 Scales)**

Time of Day	Arrival Rate (veh per 30 mins)	Processing Rate (veh per 30 mins)	Queue at end of this period (veh)	Queue at end of this period (ft)	Available Storage (ft)	Will Demand Exceed Storage?
12:00 a.m. to 12:30 a.m.	0	120	0.0	0	2,900	No
12:30 a.m. to 1:00 a.m.	0	120	0.0	0	2,900	No
1:00 a.m. to 1:30 a.m.	0	120	0.0	0	2,900	No
1:30 a.m. to 2:00 a.m.	0	120	0.0	0	2,900	No
2:00 a.m. to 2:30 a.m.	0	120	0.0	0	2,900	No
2:30 a.m. to 3:00 a.m.	0	120	0.0	0	2,900	No
3:00 a.m. to 3:30 a.m.	9	120	0.0	0	2,900	No
3:30 a.m. to 4:00 a.m.	9	120	0.0	0	2,900	No
4:00 a.m. to 4:30 a.m.	39	120	0.0	0	2,900	No
4:30 a.m. to 5:00 a.m.	39	120	0.0	0	2,900	No
5:00 a.m. to 5:30 a.m.	57	120	0.0	0	2,900	No
5:30 a.m. to 6:00 a.m.	57	120	0.0	0	2,900	No
6:00 a.m. to 6:30 a.m.	63	120	0.0	0	2,900	No
6:30 a.m. to 7:00 a.m.	63	120	0.0	0	2,900	No
7:00 a.m. to 7:30 a.m.	63	120	0.0	0	2,900	No
7:30 a.m. to 8:00 a.m.	63	120	0.0	0	2,900	No
8:00 a.m. to 8:30 a.m.	87	120	0.0	0	2,900	No
8:30 a.m. to 9:00 a.m.	87	120	0.0	0	2,900	No
9:00 a.m. to 9:30 a.m.	81	120	0.0	0	2,900	No
9:30 a.m. to 10:00 a.m.	81	120	0.0	0	2,900	No
10:00 a.m. to 10:30 a.m.	84	120	0.0	0	2,900	No
10:30 a.m. to 11:00 a.m.	84	120	0.0	0	2,900	No
11:00 a.m. to 11:30 a.m.	121	120	1.0	50	2,900	No
11:30 a.m. to 12:00 p.m.	121	120	2.0	100	2,900	No
12:00 p.m. to 12:30 p.m.	100	120	0.0	0	2,900	No
12:30 p.m. to 1:00 p.m.	100	120	0.0	0	2,900	No
1:00 p.m. to 1:30 p.m.	78	120	0.0	0	2,900	No
1:30 p.m. to 2:00 p.m.	78	120	0.0	0	2,900	No
2:00 p.m. to 2:30 p.m.	87	120	0.0	0	2,900	No
2:30 p.m. to 3:00 p.m.	87	120	0.0	0	2,900	No
3:00 p.m. to 3:30 p.m.	75	120	0.0	0	2,900	No
3:30 p.m. to 4:00 p.m.	75	120	0.0	0	2,900	No
4:00 p.m. to 4:30 p.m.	84	120	0.0	0	2,900	No
4:30 p.m. to 5:00 p.m.	84	120	0.0	0	2,900	No
5:00 p.m. to 5:30 p.m.	21	120	0.0	0	2,900	No
5:30 p.m. to 6:00 p.m.	21	120	0.0	0	2,900	No
6:00 p.m. to 6:30 p.m.	0	120	0.0	0	2,900	No

**TABLE 4**  
**Summary of Queuing Analysis of Estimated Peak Project Trip Generation (2,105 inbound trips) at New Chiquita Canyon Landfill Entrance on Opening Day (4 Scales)**

Time of Day	Arrival Rate (veh per 30 mins)	Processing Rate (veh per 30 mins)	Queue at end of this period (veh)	Queue at end of this period (ft)	Available Storage (ft)	Will Demand Exceed Storage?
6:30 p.m. to 7:00 p.m.	0	120	0.0	0	2,900	No
7:00 p.m. to 7:30 p.m.	0	120	0.0	0	2,900	No
7:30 p.m. to 8:00 p.m.	0	120	0.0	0	2,900	No
8:00 p.m. to 8:30 p.m.	0	120	0.0	0	2,900	No
8:30 p.m. to 9:00 p.m.	0	120	0.0	0	2,900	No
9:00 p.m. to 9:30 p.m.	0	120	0.0	0	2,900	No
9:30 p.m. to 10:00 p.m.	0	120	0.0	0	2,900	No
10:00 p.m. to 10:30 p.m.	0	120	0.0	0	2,900	No
10:30 p.m. to 11:00 p.m.	0	120	0.0	0	2,900	No
11:00 p.m. to 11:30 p.m.	0	120	0.0	0	2,900	No
11:30 p.m. to 12:00 a.m.	0	120	0.0	0	2,900	No
<b>Total Number of Vehicles</b>	<b>2,105</b>		<b>Maximum Queue Length (ft)</b>	<b>100</b>	<b>Will Queue Ever Exceed Storage</b>	<b>No</b>

**TABLE 5**  
**Summary of Queuing Analysis of Projected Inbound Trips based on Gate Receipts (785 inbound trips) at New Chiquita Canyon Landfill Entrance on Opening Day (4 Scales)**

Time of Day	Arrival Rate (veh per 30 mins)	Processing Rate (veh per 30 mins)	Queue at end of this period (veh)	Queue at end of this period (ft)	Available Storage (ft)	Will Demand Exceed Storage?
12:00 a.m. to 12:30 a.m.	0	120	0.0	0	2,900	No
12:30 a.m. to 1:00 a.m.	0	120	0.0	0	2,900	No
1:00 a.m. to 1:30 a.m.	0	120	0.0	0	2,900	No
1:30 a.m. to 2:00 a.m.	0	120	0.0	0	2,900	No
2:00 a.m. to 2:30 a.m.	0	120	0.0	0	2,900	No
2:30 a.m. to 3:00 a.m.	0	120	0.0	0	2,900	No
3:00 a.m. to 3:30 a.m.	3	120	0.0	0	2,900	No
3:30 a.m. to 4:00 a.m.	3	120	0.0	0	2,900	No
4:00 a.m. to 4:30 a.m.	15	120	0.0	0	2,900	No
4:30 a.m. to 5:00 a.m.	15	120	0.0	0	2,900	No
5:00 a.m. to 5:30 a.m.	21	120	0.0	0	2,900	No
5:30 a.m. to 6:00 a.m.	21	120	0.0	0	2,900	No
6:00 a.m. to 6:30 a.m.	24	120	0.0	0	2,900	No
6:30 a.m. to 7:00 a.m.	24	120	0.0	0	2,900	No
7:00 a.m. to 7:30 a.m.	24	120	0.0	0	2,900	No
7:30 a.m. to 8:00 a.m.	24	120	0.0	0	2,900	No
8:00 a.m. to 8:30 a.m.	33	120	0.0	0	2,900	No
8:30 a.m. to 9:00 a.m.	33	120	0.0	0	2,900	No
9:00 a.m. to 9:30 a.m.	30	120	0.0	0	2,900	No

**TABLE 5**  
**Summary of Queuing Analysis of Projected Inbound Trips based on Gate Receipts (785 inbound trips) at New Chiquita Canyon Landfill Entrance on Opening Day (4 Scales)**

Time of Day	Arrival Rate (veh per 30 mins)	Processing Rate (veh per 30 mins)	Queue at end of this period (veh)	Queue at end of this period (ft)	Available Storage (ft)	Will Demand Exceed Storage?
9:30 a.m. to 10:00 a.m.	30	120	0.0	0	2,900	No
10:00 a.m. to 10:30 a.m.	31	120	0.0	0	2,900	No
10:30 a.m. to 11:00 a.m.	31	120	0.0	0	2,900	No
11:00 a.m. to 11:30 a.m.	45	120	0.0	0	2,900	No
11:30 a.m. to 12:00 p.m.	45	120	0.0	0	2,900	No
12:00 p.m. to 12:30 p.m.	37	120	0.0	0	2,900	No
12:30 p.m. to 1:00 p.m.	37	120	0.0	0	2,900	No
1:00 p.m. to 1:30 p.m.	29	120	0.0	0	2,900	No
1:30 p.m. to 2:00 p.m.	29	120	0.0	0	2,900	No
2:00 p.m. to 2:30 p.m.	33	120	0.0	0	2,900	No
2:30 p.m. to 3:00 p.m.	33	120	0.0	0	2,900	No
3:00 p.m. to 3:30 p.m.	28	120	0.0	0	2,900	No
3:30 p.m. to 4:00 p.m.	28	120	0.0	0	2,900	No
4:00 p.m. to 4:30 p.m.	31	120	0.0	0	2,900	No
4:30 p.m. to 5:00 p.m.	31	120	0.0	0	2,900	No
5:00 p.m. to 5:30 p.m.	8	120	0.0	0	2,900	No
5:30 p.m. to 6:00 p.m.	8	120	0.0	0	2,900	No
6:00 p.m. to 6:30 p.m.	0	120	0.0	0	2,900	No
6:30 p.m. to 7:00 p.m.	0	120	0.0	0	2,900	No
7:00 p.m. to 7:30 p.m.	0	120	0.0	0	2,900	No
7:30 p.m. to 8:00 p.m.	0	120	0.0	0	2,900	No
8:00 p.m. to 8:30 p.m.	0	120	0.0	0	2,900	No
8:30 p.m. to 9:00 p.m.	0	120	0.0	0	2,900	No
9:00 p.m. to 9:30 p.m.	0	120	0.0	0	2,900	No
9:30 p.m. to 10:00 p.m.	0	120	0.0	0	2,900	No
10:00 p.m. to 10:30 p.m.	0	120	0.0	0	2,900	No
10:30 p.m. to 11:00 p.m.	0	120	0.0	0	2,900	No
11:00 p.m. to 11:30 p.m.	0	120	0.0	0	2,900	No
11:30 p.m. to 12:00 a.m.	0	120	0.0	0	2,900	No
<b>Total Number of Vehicles</b>	<b>785</b>	<b>Maximum Queue Length (ft)</b>	<b>0</b>	<b>Will Queue Ever Exceed Storage</b>	<b>No</b>	

**TABLE 6**  
**Summary of Queuing Analysis of Estimated Peak Project Trip Generation and Available Capacity at New**  
**Chiquita Canyon Landfill Entrance on Opening Day (4 Scales)**

Time of Day	Hourly Processing Rate (veh/hour) <sup>a</sup>	Total Inbound Waste Vehicles per hour	Additional Inbound Vehicles per hour Able to be Accommodated without a Queue
12:00 a.m. to 1:00 a.m.	240	0	240
1:00 a.m. to 2:00 a.m.	240	0	240
2:00 a.m. to 3:00 a.m.	240	0	240
3:00 a.m. to 4:00 a.m.	240	18	222
4:00 a.m. to 5:00 a.m.	240	78	162
5:00 a.m. to 6:00 a.m.	240	115	125
6:00 a.m. to 7:00 a.m.	240	127	113
7:00 a.m. to 8:00 a.m.	240	127	113
8:00 a.m. to 9:00 a.m.	240	175	65
9:00 a.m. to 10:00 a.m.	240	163	77
10:00 a.m. to 11:00 a.m.	240	169	71
11:00 a.m. to 12:00 p.m.	240	241	0
12:00 p.m. to 1:00 p.m.	240	199	41
1:00 p.m. to 2:00 p.m.	240	157	83
2:00 p.m. to 3:00 p.m.	240	175	65
3:00 p.m. to 4:00 p.m.	240	151	89
4:00 p.m. to 5:00 p.m.	240	169	71
5:00 p.m. to 6:00 p.m.	240	42	198
6:00 p.m. to 7:00 p.m.	240	0	240
7:00 p.m. to 8:00 p.m.	240	0	240
8:00 p.m. to 9:00 p.m.	240	0	240
9:00 p.m. to 10:00 p.m.	240	0	240
10:00 p.m. to 11:00 p.m.	240	0	240
11:00 p.m. to 12:00 a.m.	240	0	240

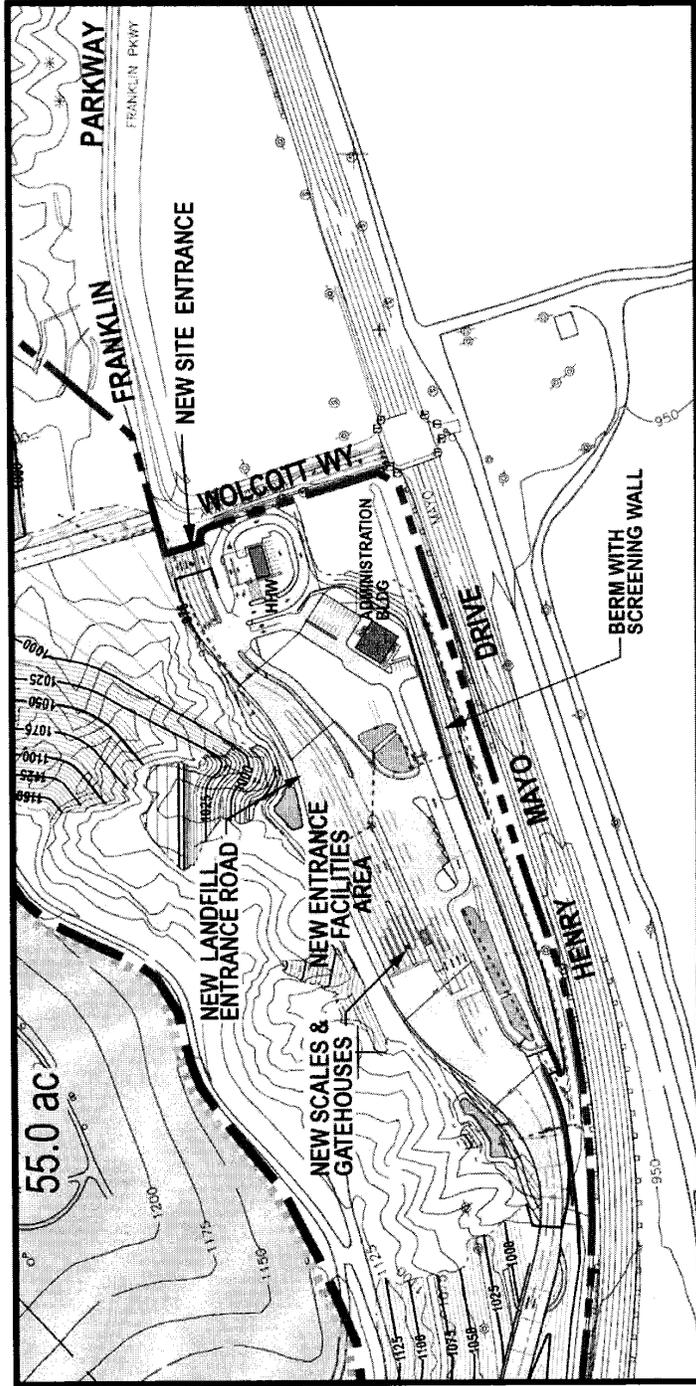
<sup>a</sup> Number of 50-foot vehicles that can be processed per hour at CCL entrance without queuing.

**TABLE 7**  
**Summary of Queuing Analysis of Projected Inbound Trips based on Gate Receipts and Available Capacity at**  
**New Chiquita Canyon Landfill Entrance on Opening Day (4 Scales)**

<b>Time of Day</b>	<b>Hourly Processing Rate (veh/hour)<sup>a</sup></b>	<b>Total Inbound Waste Vehicles per hour</b>	<b>Additional Inbound Vehicles per hour Able to be Accommodated without a Queue</b>
12:00 a.m. to 1:00 a.m.	240	0	240
1:00 a.m. to 2:00 a.m.	240	0	240
2:00 a.m. to 3:00 a.m.	240	0	240
3:00 a.m. to 4:00 a.m.	240	7	233
4:00 a.m. to 5:00 a.m.	240	29	211
5:00 a.m. to 6:00 a.m.	240	43	197
6:00 a.m. to 7:00 a.m.	240	47	193
7:00 a.m. to 8:00 a.m.	240	47	193
8:00 a.m. to 9:00 a.m.	240	65	175
9:00 a.m. to 10:00 a.m.	240	61	179
10:00 a.m. to 11:00 a.m.	240	63	177
11:00 a.m. to 12:00 p.m.	240	90	150
12:00 p.m. to 1:00 p.m.	240	74	166
1:00 p.m. to 2:00 p.m.	240	58	182
2:00 p.m. to 3:00 p.m.	240	65	175
3:00 p.m. to 4:00 p.m.	240	56	184
4:00 p.m. to 5:00 p.m.	240	63	177
5:00 p.m. to 6:00 p.m.	240	16	224
6:00 p.m. to 7:00 p.m.	240	0	240
7:00 p.m. to 8:00 p.m.	240	0	240
8:00 p.m. to 9:00 p.m.	240	0	240
9:00 p.m. to 10:00 p.m.	240	0	240
10:00 p.m. to 11:00 p.m.	240	0	240
11:00 p.m. to 12:00 a.m.	240	0	240

<sup>a</sup> Number of 50-foot vehicles that can be processed per hour at CCL entrance without queuing.

FIGURE 1  
Proposed CCL Entrance Plan



# Letter No. 61

Gail Farber  
Los Angeles County Department of Public Works  
900 South Fremont Avenue  
Alhambra, CA 91803-1331

## Response to Comment No. 61-1

Please see Topical Response #19 for a discussion of Project Need, which includes a discussion of the referenced assembly bills.

## Response to Comment No. 61-2

Please see Partially Recirculated Draft EIR Sections 1.5 (Clarification of Operational Baseline) and 1.7 (Recent Operation of CCL) for detailed discussions of disposal rates, with graphs and charts. Also see Topical Response #8, Disposal Rate and Capacity.

## Response to Comment No. 61-3

Section 2.2.7.8 of the Original Draft EIR states: "when the Newhall Ranch Project is developed, the irrigation well on Newhall Ranch that currently supplies the landfill will be removed. At that time, CCL will begin using the water supply line north of the landfill, which is connected to Valencia Water Company's system, for both construction and routine operation."

Original Draft EIR Chapter 14, Public Services and Utilities, describes the potential water impacts associated with the project. That discussion references the Water Supply Assessment prepared for the Proposed Project and confirms that there is adequate water available to serve the Proposed Project.

In addition, see Topical Response #23c, Water Supply, for a discussion of the Water Supply Assessment, and Appendix J of the Final EIR for an updated Water Supply Assessment for the Proposed Project.

## Response to Comment No. 61-4

The revised Project Description included in the Partially Recirculated Draft EIR includes odor management measures for source control, disposal, and landfill gas. The revised Chapter 11, Air Quality, also addresses odor management measures, including those associated with the mixed organics processing/composting operation. Please also see Topical Response #17, Odor.

## Response to Comment No. 61-5

Please see Topical Response #15, Land Use, for a discussion of the County's Methane Mitigation Standards with regard to the Proposed Project.

## Response to Comment No. 61-6

Original Draft EIR Chapter 3, General Setting and Resource Area Analysis, describes the surrounding future major residential projects in the vicinity of CCL in a discussion of cumulative impacts, and each of the resource area discussions in Chapters 4 through 15 address potential impacts to these cumulative projects. Additional discussion has also been added to Chapter 4, Land Use, of the Final EIR, to direct the reader to the sections of the Final EIR that address those potential impacts.

## Response to Comment No. 61-7

Please see Topical Response #17, Odor, for a discussion of the potential for odors from the proposed increase in landfill elevation, as well as the mixed organics processing/composting facility.

## Response to Comment No. 61-8

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for clarification of this subject. BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the Mitigation Monitoring and Reporting Plan (MMRP) included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the South Coast Air Quality Management District (SCAQMD), who will oversee compliance with permit conditions and dust control plans.

## Response to Comment No. 61-9

Please see the Visual Supplement included with the Partially Recirculated Draft EIR, as well as Topical Response #27 for a discussion of Visual Resources, including potential impacts to proposed Newhall Land and Farming Company developments.

## Response to Comment No. 61-10

The referenced document has been included in the Final EIR. Please see Appendix D for the September 2014 Clarification of Geotechnical Issues.

## Response to Comment No. 61-11

Please see revised Chapter 2, Project Description, in the Partially Recirculated Draft EIR for an updated discussion of Proposed Project Earthwork. Specifically, see Table 2-5, Estimated Proposed Project Earthwork. As currently planned, the proposed excavation quantity balances the landfill soil requirements.

## Response to Comment No. 61-12

Figure 10-4 has been replaced in the Final EIR to reflect the most recent site plan for the Proposed Project.

## Response to Comment No. 61-13

A description of the referenced roadway section has been incorporated into Section 10.4.1 of the Final EIR per the commenter's request.

## Response to Comment No. 61-14

Please see Topical Response #23c, Water Supply, for a discussion of the Water Supply Assessment, and Appendix J of the Final EIR for an updated Water Supply Assessment for the Proposed Project.

## Response to Comment No. 61-15

Comment acknowledged. The Original Draft EIR was reviewed by the Los Angeles County Department of Public Health - Environmental Health Division. Please also see Topical Response #23, Public Services and Utilities.

## Response to Comment No. 61-16

The referenced technical memorandum was subsequently updated and included as part of the Traffic Supplement of the Partially Recirculated Draft EIR. The Traffic Supplement has been subsequently included in Appendix G of the Final EIR.

## Response to Comment No. 61-17

The difference in Intersection Capacity Utilization between the Original Draft EIR and Transportation Impact Analysis is a simple juxtaposition of numbers. Section 10.4.3 of the Final EIR has been revised to show the correct Intersection Capacity Utilization of 0.423.

## Response to Comment No. 61-18

The requested hydrologic analysis for CCL based on Public Works' current hydrology methods and standards will be provided to the Los Angeles County Department of Public Works during Conditional Use Permit design review.

Comments on the DEIR, Case No. [Project No. R2004-00559-(5)]

10/23/2014

DEIR Comments

Mr. Jeremiah Dockray  
30651 Arlington St.  
Val Verde, CA 91384  
[jdockray@gmail.com](mailto:jdockray@gmail.com)

October 23, 2014

Ms. Iris Chi  
Los Angeles County, Department of Regional Planning  
320 West Temple Street, Room 1348

CHIQUITA CANYON LANDFILL DRAFT ENVIRONMENTAL IMPACT REPORT

Chiquita Canyon Landfill Master Plan Revision  
Project No. R2004-005599-(5)  
Conditional Use Permit No. 200400042  
Environmental Case No. 200400039

Dear Ms. Chi,

Attached are my comments for the Chiquita Canyon Landfill's proposed expansion. As a member of the community closest to the landfill, I have seen some of its effects firsthand, and I believe that the project is ill-conceived on many levels. In my research on the landfill's current operations, they appear unable to uphold the terms of their original CUP as it currently stands, and this does not bode well for their ability to expand safely.

62-1

This project is also at fault for not including the entire community which it will be affecting. Val Verde has a nearly 60% rate of Spanish speaking families, many of which are unable to comment on this DEIR, as it and all other documents regarding this project are unavailable in Spanish. Therefore, I propose that the DEIR process be restarted with all documents made available to the entire community. To shut out a large amount of minority and low income families is unacceptable and is in bad faith. The County needs to make sure it is representing all of its citizens.

62-2

I understand the complexity of the issue, and I truly believe that an alternative to this project can be found and implemented safely and at less risk to an immediate community. Thank you for your time and service to our community.

Chapter 10 Traffic and Transportation

10.2.1 Study Area	Comments	62-3
	<p>Please specify what constitutes “morning and evening peak hours”. This is not clear either here nor on the traffic worksheet documents in Appendix G.</p> <p>Please specify what “Other Development Conditions” includes. If not included, please add conditions for the Newhall Ranch Development.</p>	
10.2.2 Analysis Methodology	Comments	62-4
<p>10.2.2 Analysis Methodology</p> <p>“all impacts are assessed using the ICU methodology only. The HCM analysis is provided for Caltrans review purposes because SR-126 is a Caltrans facility.”</p> <p>“A saturation flow rate of 1,600 vehicles per hour per lane for all through/turn lanes and 2,880 vehicles per hour per lane for all dual turn lanes was used in the ICU calculation”</p>	<p>Please specify which version of the HCM method is being used. The most recent is from 2010, with another update coming in 2015. If not using the latest version, all calculations should be redone according to any changes or updates to the HCM method.</p> <p>The cons of using only the ICU method include the lower default saturation values leading to more conservative results, and the results in terms of V/C can be conceptually more difficult for the lay person to understand than a delay value.</p> <p>The ICU and HCM methods should both be used in final analysis, as they will paint a more realistic picture of traffic impacts.</p> <p>The HCM Operations method generally yields better LOS results than the ICU method, which generally produces higher numbers of intersections operating at both ends of the spectrum, more intersections at LOS A and more intersections at LOS E and F, than the HCM 2000 Operations method.</p> <p>Please elaborate on why other primary inputs were not used in the ICU calculation, including lane utilization, lost time, permitted left factor, green time, and platoon factor.</p>	

		Please elaborate on what the saturation flow rate was for the calculation of the HCM method. The base saturation for HCM is 1,900 passenger cars per hour of green per lane. If the saturation rate used was not this number, please elaborate on the factors used to reduce or increase this base saturation flow rate including lane width, heavy vehicles, grade, parking, bus blocking, area type, lane utilization, left turns, right turns, pedestrians affecting left turns, and pedestrians and bicycles affecting right turns.	62-4 cont'd
10.4 Regional and Local Setting		Comments	
10.4 Regional and Local Setting "CCL is located in the northwestern portion of unincorporated Los Angeles County and is approximately 3 miles west of the I-5 and SR-126 interchange. CCL is also approximately 7 miles northwest of the city of Santa Clarita, 33 miles northwest of Downtown Los Angeles, and 18 miles east of the city of Fillmore."		Please add mileage from CCL to all current clients (ranging all the way from Orange County to Santa Clarita). This is important to illustrate Traffic impacts. If more clients from further away are sending more waste in the event of an expansion, the traffic impact is considerably expanded as well.	62-5
10.4.2 Existing Conditions "Peak-hour volume traffic signal warrants indicate that signals are not warranted at Chiquito Canyon Road/SR-126 and Chiquita Canyon Landfill Entrance/SR-126 under existing conditions."		Again, ICU and HCM methodologies should be combined in this report, so that it paints a more realistic picture of the need for things like a signal at Chiquita Canyon/SR-126, etc.	62-6
10.5.2			
Section 10.6		Comments	
Table 10-6		Please clarify the 720 trucks of contaminated soil.  Please list the contaminants.  Please include at what levels each	62-7

	<p>contaminant will be at.</p> <p>Please list the dangers for each contaminant to the human population and to the animal population.</p> <p>Please list all side effects.</p> <p>Please include all the sites the soil will be coming from and at what level the contaminants will be from each site.</p> <p>Please clarify the reasons the contaminants are leaving their original locations, making sure to include any lawsuits that are requiring the contaminants to be moved.</p> <p>Please list and provide all procedures that will control the dust and small particles from escaping into the air, as dust and particles will be stirred up with each load of dirt.</p> <p>Please list the level of small particles expected to escape into the air from the 720 loads a day.</p> <p>Please factor in the average wind speed and direction.</p> <p>Please re-calculate figures in the air quality section and in the water quality section to include the 720 trucks of contaminated soil.</p> <p>Please make sure to include all this data in a press release in Santa Clarita and all</p>
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62-7  
cont'd

	<p>surrounding areas within a 20 mile radius. Please include the life span of a liner and factor that into the calculations. Please include 5 year, 10 year, 15 year, and so on. All liners fail.</p> <p>Please factor in the damage to the Santa Clara river bed and the damage that will cause to Piru, Fillmore, and so on.</p> <p>Please include the factors that it will or will not have on the ocean. If it is beyond or out of your scope then the project is in default and has to many uncertain factors or variables to be considered viable. The future cannot be sacrificed for the present, or the few for the many.</p> <p>Please include all procedures beyond liners to ensure that the Santa Clara River will be safe from all contaminants in the future.</p> <p>Please list mitigation procedures for future lawsuits should they arise for illness due to air or water quality.</p> <p>Please list all evidence that ensures the landfill and the county (who will be liable after the landfill has closed) has the funds for mitigation from all parties involved.</p>	62-7 cont'd
	<p>Please clarify we added all inbound vehicles then divided by 24 hours, then divided by 4 incoming lanes, and we came up with 99.1 vehicles coming into the landfill per lane per</p>	62-8

	<p>hour. Please clarify if this will be per hour or there will be more peak hours where there will be 200 to 300 per lane per hour.</p> <p>Please refactor idling time to a realistic formula. It is not possible to inform trucks that they can only idle for 2, 3.5, or 5 minutes when they are stuck on the 126 – IS 5 corridor for what could be hours at a time. Based on this information please redo your math as this is a gross miscalculation. Even by your numbers which is 10254 per day, most of them incoming, the calculations would be way beyond what an F would be on your table #10-1.</p> <p>Please recalculate the fuel exhaust from diesel and regular gas engines for at least 9,592 incoming vehicles that are stagnantly sitting and waiting to enter the landfill.</p> <p>Please take the daily exhaust released factor into your air quality figures in Chapter 11, for the real amount of vehicles coming in, and compare the new figures to the ACAQMD chart to realistically show the average day, not the suspected perfect day, as we know that is not possible. To not do so is fraudulent and a gross misrepresentation. The new figures will far exceed the 10 a million but will represent the reality of our situation.</p>
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62-8  
cont'd

	Comments	
18.3.2	18.3.2 – Please explore the possibilities of a No Project and Smaller Project scenarios in more detail.	62-9
	18.4.3.2, Table 18-4 - The air quality section of the table addresses the impacts to the South Coast air basin as a whole and does not address the comparative air quality impacts to the proposed expansion on the residences in Val Verde and the Live Oak neighborhoods (as well as the proposed Newhall Ranch neighborhoods) versus the air quality impacts to residences from an alternative new site that could be more remote, and not having residences living right up against it. More specifics are needed in the description of the alternative site.	62-10

# Letter No. 62

Jeremiah Dockray  
30651 Arlington St.  
Val Verde, CA 91384

## Response to Comment No. 62-1

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

## Response to Comment No. 62-2

Please see Topical Response #22, Public Scoping and Public Outreach.

## Response to Comment No. 62-3

Please see Topical Response #25, Traffic, including a discussion of Newhall Ranch Developments.

## Response to Comment No. 62-4

Please see Topical Response #25, Traffic, including a discussion of the methodology used for the traffic analysis.

## Response to Comment No. 62-5

Please see Topical Response #25, Traffic, including a discussion of the methodology used for the traffic analysis.

## Response to Comment No. 62-6

Please see Topical Response #25, Traffic, including a discussion of the methodology used for the traffic analysis.

## Response to Comment No. 62-7

Please see Topical Response #25, Traffic. A discussion of Intersection Queues at State Route 126 (SR-126)/Wolcott Way, regarding the adequacy of storage at the intersection of SR-126 and Wolcott Way to accommodate peak hour traffic with the project-added trips is described therein.

Please also see the following Topical Responses:

- Topical Response #1 for a discussion of Air Quality
- Topical Response #10 for a discussion of Environmental Monitoring
- Topical Response #14 for a discussion of the Landfill Liner System
- Topical Response #21 for a discussion of Public Health
- Topical Response #22 for a discussion of Public Scoping and Public Outreach
- Topical Response #29a for a discussion of Wastes to be Disposed
- Topical Response #30 for a discussion of Water Quality

Please see Final EIR Chapter 2, Project Description, Section 2.3, Landfill Closure and Post-Closure, for a discussion of the landfill closure activities, including financial assurance.

## Response to Comment No. 62-8

Please see the response for Comment No. 62-7.

## Response to Comment No. 62-9

Please see revised Chapter 18, Project Alternatives, of the Partially Recirculated Draft EIR for a discussion of the No Project Alternative and smaller onsite alternatives. Please also see Topical Response #18, Project Alternatives.

## Response to Comment No. 62-10

Please see revised Chapter 18, Project Alternatives, of the Partially Recirculated Draft EIR for a discussion of the No Project Alternative and smaller onsite alternatives. Please also see Topical Response #18, Project Alternatives.



**Iris Chi**

---

**From:** Susie Sheffield-Evans [sheffs@pacbell.net]  
**Sent:** Wednesday, October 22, 2014 8:45 PM  
**To:** Iris Chi; icihi@planning.lacounty.gov  
**Subject:** DEIR response Project No. R2004-00559-(5) SCH No. 2005081071

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

October 23, 2014

Attn: Iris Chi  
Zoning Permits Section Rm 1345  
Los Angeles Dept. of Regional Planning  
320 W. Temple St.  
Los Angeles, CA 90012

DEIR Project No. R2004-00559-(5) SCH No. 2005081071

I would like to inquire about something that I don't think has been mentioned in any one part of the DEIR. To create a new entrance to the Chiquita Canyon Landfill they will have to remove allot of trash that has been covered for a while to make way for their entrance to be off Wolcott Way instead of Highway 126.

I request you tell me where they plan on putting this former portion of the landfill while they create the new entrance.

I request to know the method they will use to prevent the odors and toxins from being released into the air and ground and water supply while they are creating the new entrance.

I would also like to know how long the formerly buried trash will be exposed before it is re-buried.

63-1

Thank you,

Susan Evans  
29830 Lincoln Ave.  
Val Verde, CA 91384  
(661) 702-9782  
[Sheffs@pacbell.net](mailto:Sheffs@pacbell.net)

## Letter No. 63

Susan Evans  
29830 Lincoln Ave.  
Val Verde, CA 91384

### Response to Comment No. 63-1

This comment is incorrect. No waste has been placed within the area of the new site entrance for the Proposed Project.

3435 Wilshire Boulevard  
Suite 660  
Los Angeles CA 90010-1904



(213) 387-4287 phone  
(213) 387-5583 fax  
www.angeles.sierraclub.org

Angeles Chapter

October 23, 2014

Attn: Ms. Iris Chi

Zoning Permits North Section Rm 1348  
Los Angeles County Dept of Regional Planning  
320 W. Temple St.  
Los Angeles CA 90012

Sent by electronic mail to [lchi@planning.lacounty.gov](mailto:lchi@planning.lacounty.gov)

October 23, 2014

**RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR CHIQUITA CANYON LANDFILL EXPANSION PROJECT, STATE CLEARINGHOUSE # 2005081071**

Dear Ms. Chi,

On behalf of the Angeles Chapter of the Sierra Club, we submit comments on the Chiquita Canyon Expansion Project. We strongly urge that no expansion be granted until the various cities dumping trash in this landfill commit to a Zero Waste Policy similar to the City of Glendale's Zero Waste Resolution to achieve 90% diversion by 2030.

We encourage you to move forward with the No Project Alternative. Several of the cities that utilize this landfill including Santa Clarita and Pasadena are already committed to significantly reducing their waste disposal by the time the landfill would fill at its current permitted capacity – extending the life of the landfill will undermine this commitment by making it all too easy to keep landfilling materials that should be recycled or composted. Expanding the landfill has far too significant of impacts on the environment and community and should not be necessary if progress is made on the Zero Waste goals being promoted by many cities and Santa Clarita's Climate Action Plan, thereby reducing the need for in-County landfill capacity.

64-1

**I. The DEIR Does Not Adequately Discuss Alternatives to the Proposed Project.**

64-2

The analysis of alternatives to the proposed project lies at “[t]he core of an EIR.”<sup>1</sup> Given this, the EIR must consider a reasonable range of alternatives that would avoid or substantially lessen this impact while feasibly attaining most of the Project’s basic objectives.<sup>2</sup> If the EIR refuses to consider a reasonable range of alternatives or fails to support its analysis with substantial evidence, the purposes of CEQA are subverted and the EIR is legally inadequate.<sup>3</sup> If a feasible alternative exists that will meet the project’s objectives while reducing or avoiding its significant environmental impacts, the project may not be approved.<sup>4</sup>

64-2  
cont'd

The project alternatives analysis, considering merely three options, is inadequate. In this case, the Proponent describes the project’s objectives in such a way as to make alternatives infeasible (for instance citing local job creation as a part of the project), then fails to discuss alternatives that would otherwise be feasible. Such objectives are inappropriate since they purposely eliminate alternatives that would reduce impacts to the environment and/or reduce health and other impacts to the nearby community of Val Verde.

The DEIR notes in section 1.1.1 that “In 2013, 66 percent, by weight, of the solid waste disposed at CCL originated from transfer stations.” Certainly trash originating from transfer stations could be transported anywhere in the County area. While rail-haul is not an alternative that the Sierra Club would necessarily support, it should have been included in the alternative analysis.

64-3

Failure to include a reduced capacity footprint is the most egregious omission. The City of Santa Clarita has required its waste haulers to build and operate a materials recovery facility. County wide zero waste efforts along with a statewide single use plastic bag ban just enacted by the legislature will reduce Countywide waste generation, thus reducing or eliminating the need for additional landfill capacity.

64-4

**II. The Proposed Project Will Have an Indelible Impact On Adjacent Communities and the Region.**

The impacts from the facility were not properly accounted for and the mitigations proposed are inadequate to address the concerns with this facility’s operation. This project has major implications for neighboring communities and public spaces such as parks and schools, as well as significant air and water quality impacts. These impacts have not been adequately addressed or mitigations proposed.

64-5

The health impacts and regional air quality impacts from heavy truck activities are well documented. Diesel particulate matter (“DPM”) is known to present the greatest health risks to Californians of all listed toxic air contaminants (“TACs”) identified by the California Air Resources Board

<sup>1</sup>*Citizens of Goleta Valley II*, 52 Cal. 3d at 564; see also Pub. Res. Code § 21002.1(a) (“The purpose of an environmental impact report is. . . to identify alternatives to the project . . .”).

<sup>2</sup>See § 21100(b)(4); CEQA Guidelines § 15126.6(a).

<sup>3</sup>*San Joaquin Raptor*, 27 Cal. App. 4th at 735-38; *Kings County Farm Bureau*, 221 Cal. App. 3d at 736-37.

<sup>4</sup>Pub. Res. Code § 21002.

("CARB").<sup>5</sup> Numerous studies have shown adverse impacts from DPM and NO<sub>x</sub> (nitrogen oxides), including respiratory disease, cardiovascular mortality, cancer, and reproductive effects as well as increased smog and water contamination. CARB has determined that diesel exhaust is responsible for over 70% of the health risk from breathing air within our region, the South Coast Air Basin ("SCAB").<sup>6</sup> Given the location of this proposed project amidst polluted air in the region, the Project Proponent cannot take lightly the decision to allow increased truck traffic for years to come.

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### III. GHG Emissions from this Project are Underestimated

Concentrations of greenhouse gases (GHGs) in the atmosphere "are projected to continue increasing unless the major emitters take action to reduce emissions." See *Endangerment and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the Clean Air Act*, 74 Fed. Reg. 66,496, 66,539 (Dec. 15, 2009). The extent of future global warming depends on whether and how rapidly California and the rest of the world reduce GHG emissions. Even under a low emissions scenario, which assumes rapid reductions in GHG pollution, California is projected to experience a host of impacts by the end of this century, including 30 – 60% loss of the Sierra snowpack, a 10 – 35% increase in the risk of wildfires, 1.5 times more critically dry years, and increases in ozone formation, smog, and air quality-related fatalities in the South Coast Air Basin.<sup>7</sup> Under a higher emissions scenario, projected impacts to California are staggering and include a 90% loss of the Sierra snowpack and 4 – 6 times as many heat-related deaths.<sup>8</sup> Decomposition of waste in landfills produces carbon dioxide (CO<sub>2</sub>) and methane (CH<sub>4</sub>), potent greenhouse gases.<sup>9</sup> Because of their contributions to climate change, both EPA and the State of California recognize the importance of curbing GHG emissions from landfills.<sup>10</sup>

#### CEQA Guideline 15064.4 (a) states that

"A lead agency should make a good-faith effort, based on available information, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project ... The lead agency has discretion to select the model it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the

64-6

<sup>5</sup> CARB, *Emissions Reduction Plan for Ports and Goods Movement in California*, 7 (2006) (hereinafter "ERP").

<sup>6</sup> ERP, 7.

<sup>7</sup> See *California Climate Change Center, Our Changing Climate: Assessing the Risks to California* (2006) at 15, available at [http://meteora.ucsd.edu/cap/pdffiles/CA\\_climate\\_Scenarios.pdf](http://meteora.ucsd.edu/cap/pdffiles/CA_climate_Scenarios.pdf).

<sup>8</sup> *Id.*

<sup>9</sup> Landfills are the second largest anthropogenic source of methane in the United States, contributing approximately 22% of total U.S. methane emissions. EPA, *Guidance for Determining Best Available Control Technology for Reducing Carbon Dioxide Emissions from Bioenergy Production* (Mar. 2011), available at <http://www.epa.gov/nsr/ghgdocs/bioenergyguidance.pdf>.

<sup>10</sup> See EPA, *Guidance for Determining Best Available Control Technology for Reducing Carbon Dioxide Emissions from Bioenergy Production* (Mar. 2011), available at <http://www.epa.gov/nsr/ghgdocs/bioenergyguidance.pdf>; California Air Resources Board, *Landfill Methane Control Measure*, <http://www.arb.ca.gov/cc/landfills/landfills.htm> (last visited Aug. 25, 2014).

particular model or methodology selected for use; or 2. Rely on a qualitative analysis or performance based standards.”

The DEIR states: “CO2 emissions from off-road diesel equipment exhaust were estimated using SCAQMD OFFROAD 2007 emission factors. Though CARB has released an updated version of the OFFROAD model, OFFROAD 2011, it was not used for this analysis as it provides inventory level emissions rather than equipment-specific emission factors. CO2 and CH4 emissions from on-road vehicle exhaust were estimated using EMFAC2011 average emission factors for the SCAQMD.” (page 12-5)

We assert that this modeling choice may have resulted in inaccurate estimation and/or underestimation of greenhouse gas emissions for on site and off-site mobile sources because the Project Proponent cannot know the emissions of vehicles it does not yet own or that other operate. Further, the DEIR preparer fails to describe the limitations of the model as required by CEQA.

Further, we believe the DEIR has inaccurately and purposefully underestimated the vehicle miles traveled. The methodology for ascertaining miles traveled in the DEIR is as follows:

“It was assumed that service trucks would travel 5 miles per day onsite, that waste trucks would travel 6 miles per day offsite and 4 miles per day onsite with an idling time of 3.5 minutes, and In accordance with CARB interim thresholds for GHG emissions, the equipment exhaust will not be included in the evaluation of the operational emissions impact. The Proposed Project incorporates the CARB interim performance standards for construction and transportation.” Page 12-5

While one could probably legitimately argue that vehicle trash pick up miles should not be included, it is incorrect and inaccurate to use only the miles traveled to and from I-5 to the landfill. This substantially underestimates both air quality and GHG impacts from off site mobile sources, some of which are dirty diesel fuel vehicles. The Project Proponent admits that 66% of the trash is coming from transfer stations<sup>11</sup> and has information as to where and how much tonnage each transfer station is supplying. The vehicle miles travel (VMT) should have been accurately calculated with this information. The excuse used in the DEIR to exclude these vehicle miles and an accurate calculation was that those vehicles might go somewhere else anyway if they were not using the Chiquita landfill. While this may or may not be the case (perhaps the cities would instead provide greater waste reduction and recycling), such an argument does *not* remove the fact that the VMT from these transfer stations are now and in the future a part of the Chiquita Canyon Expansion proposal and the impacts created by their emissions should have been disclosed in the DEIR.

64-6  
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**IV. The Project Proponent Rightly Included “Biogenic Sources” From GHG Emissions Calculations, and Found that these Sources Exceeded the Threshold Level, but still Underestimates Landfill Gas.**

64-7

<sup>11</sup> DEIR page, 1-2, Table 1-2

In quantifying the Biogenic GHG emissions from this Project, we believe that the Project Proponent used an overly conservative estimate of the amount of gas destroyed by flares. Table 12-6 shows the estimated operational flaring emissions, conservatively assuming 85 percent recovery of LFG and a flare destruction efficiency of 99 percent. Both this figures are admittedly conservative. And we believe, understated. Although they could have been supported by air quality data from monitoring stations, such information is not included in the EIR. Further, members of the Val Verde community have reported odors and promised community air quality monitors were not provided or are not function.<sup>12</sup> We assert that adequate monitoring reports must be provided in order to estimate the amount of escaped landfill gas.

The Clean Air Act requires EPA to regulate air pollutants that “may reasonably be anticipated to endanger public health or welfare” under the Prevention of Significant Deterioration of Air Quality (PSD) and Title V permitting programs. In response to the Supreme Court’s decision in *Massachusetts v. EPA*, 549 U.S. 497 (2007), which held that the Clean Air Act authorizes EPA to regulate GHG emissions, EPA began regulating greenhouse gases in 2009.

Recognizing that literal application of the regulatory thresholds in the PSD and Title V permitting programs would cover millions of GHG sources, on June 3, 2010, EPA issued a “Tailoring Rule” to regulate GHG emissions from only the largest GHG emitting sources. Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule, 75 Fed. Reg. 31,514 (June 3, 2010). The Tailoring Rule covered all GHG sources, including “biogenic” CO<sub>2</sub> emissions, such as CO<sub>2</sub> generated from the biological decomposition of waste in landfills. *Id.* at 31,526-27. Among other things, the Tailoring Rule required that sources required to obtain PSD permits anyway because of their emission of conventional pollutants (“anyway sources”) would need to comply with best available control technology (BACT) for greenhouse gases if they emitted more than 75,000 tons per year of GHGs. *Id.* at 31,516.

On July 20, 2011, EPA adopted a rule deferring for three years CO<sub>2</sub> emissions from “biogenic sources,” including from solid waste landfills, from its Tailoring Rule permitting requirements, in order to “provide the Agency time to conduct a detailed examination of the science and technical issues associated with biogenic CO<sub>2</sub> emissions from stationary sources.” Deferral for CO<sub>2</sub> Emissions from Bioenergy and Other Biogenic Sources under the Prevention of Significant Deterioration (PSD) and Title V Programs, 76 Fed. Reg. 43,490, 43,490 (July 20, 2011) (Deferral Rule). The Deferral Rule still required “anyway sources” to regulate biogenic carbon dioxide emissions through BACT, however, and EPA issued a guidance document to assist permitting authorities in developing BACT standards for biogenic carbon dioxide. EPA, *Guidance for Determining Best Available Control Technology for Reducing Carbon Dioxide Emissions from Bioenergy Production* (Mar. 2011), available at <http://www.epa.gov/nsr/ghgdocs/bioenergyguidance.pdf> (EPA Biogenetic BACT Guidance). The Deferral

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<sup>12</sup> This information is based on testimony provided under oath by community members at the July 31<sup>st</sup>, 2014 public hearing on this matter.

64-7  
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Rule had a sunset provision of July 21, 2014, after which biogenic CO<sub>2</sub> emissions would be regulated under the Tailoring Rule.

On July 12, 2013, the DC Circuit vacated the Deferral Rule, holding that the rule was arbitrary and capricious. *Ctr. for Biological Diversity v. E.P.A.*, 722 F.3d 401, 404 (D.C. Cir. 2013). The Court noted that “the atmosphere makes no distinction between carbon dioxide emitted by biogenic and fossil-fuel sources” *id.* at 406, and that EPA had failed to explain how the Clean Air Act “would allow the agency to treat biogenic carbon dioxide sources differently,” *id.* at 410. *See also id.* at 412 (Judge Kavanaugh, concurring) (“There is zero basis in the text of the Clean Air Act for EPA to distinguish biogenic carbon dioxide from other sources of carbon dioxide that EPA is required . . . to regulate for purposes of the PSD and Title V permitting programs.”).

On June 23, 2014, the Supreme Court struck down EPA’s Tailoring Rule, but affirmed the agency’s authority to regulate GHGs under the Clean Air Act and its determination that an “anyway source” may be required to limit its GHG emissions by employing BACT for greenhouse gases. *Util. Air Regulatory Grp. v. E.P.A.*, 134 S. Ct. 2427 (2014).

64-7  
cont'd

**V. GHG Emissions for this Project Are Significant and Require Mitigation.**

Under CEQA, the lead agency must describe all significant environmental impacts of a project and propose mitigation measures for these impacts. Pub. Res. Code § 21002.1(a), 21100(b)(3); 14 Cal. Code Regs. § 15126.4. To determine whether greenhouse gas emissions are significant, Section 15064.4 of the CEQA Guidelines directs the lead agency to consider, among other factors, “[w]hether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.” 14 Cal. Code Regs. § 15064.4. The Project Proponent has determined that the South Coast Air Quality Management District’s interim GHG significance threshold of 10,000 MTCO<sub>2</sub>eq per year for industrial development projects (SCAQMD GHG Significance Threshold) applies to this Project.

As stated above the Clean Air Act also requires **Best Available Control Technology (BACT)** be implemented for projects that exceed the threshold levels. The law, as described above, requires that ALL sources of GHG be included, no matter what the source.. The DEIR finds that “*Based on the detailed analysis herein, the GHG emissions from the Proposed Project, excluding construction and transportation emissions, would exceed the 7,000-MTCO<sub>2</sub>e/yr significance threshold. Therefore, GHG emissions resulting from the operation of the Proposed Project would be significant.*” (DEIR 12.6.3.2)

Construction and mobile GHG sources should have been included in the totals and identified in table 12-8 that itemizes amounts of GHG releases by source so that the full extent of GHG emissions is disclosed and mitigation can be devised.

Instead of listing identifiable mitigation measures and BACT (as required by the Clean Air Act as indicated above) that will be taken to reduce greenhouse gases, the DEIR seems to promote the absurd proposition that the landfill will be its own mitigation by becoming a “carbon sink”. While this

64-8

phenomenon may indeed be occurring, it certainly does not reduce or in any way, mitigate the substantial increase in greenhouse gases released into the air by this project.

The Project Proponent then purposes to reduce GHG by:

- Idling of heavy duty hauling trucks and off-road mobile sources of any type in excess of 5 minutes, will be restricted.
- When supplemental landfill equipment is purchased, new commercially available equipment will be purchased that meets or exceeds California's emission standards in effect at the time of purchase.
- Onsite vehicles and equipment will be properly maintained per manufacturer's specifications.
- The smallest equipment possible will be used for operations at the landfill to minimize tailpipe exhaust emissions.
- **GHG-4** Energy conservation practices will be followed, including turning off all unnecessary lights.

While such conservation measures are important and should be included, a quick calculation of GHG emissions from on site equipment indicates they are less than 1% of the total project GHG generation. Thus such measures are totally inadequate as mitigation to address the enormous amount of gases released by the landfill.

Last, the Project Proponent proposes as **GHG-2** to within 3 years of project approval, submit a GHG Reduction Plan. This Plan should be completed prior to project approval and become part of the mitigation monitoring plan. Deferring its development for three years deprives the public of the opportunity to review and comment on the proposed mitigations measures as well as delaying their implementation for a highly polluting project that is scheduled to start emitting GHGs immediately. This is not acceptable.

64-8  
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**VI. The Project Proponent must propose adequate GHG mitigation measures.**

Section 12.8 Significance After Mitigation states:

"As stated in Section 12.6.3.3, the emissions generated from the operation of the Proposed Project are significant according to the CARB significance threshold. The impacts associated with the Proposed Project will be mitigated after implementation of mitigation to the fullest extent possible, again in accordance with CARB CEQA significance thresholds. **Implementation of the above mitigation measures would result in less- than- significant impacts associated with GHG and Climate Change.**"[emphasis added].

We reiterate our objections to the proposed mitigation measures as previously stated. First, the reduction in GHG emissions by the proposed mitigation measures was not quantified, so this statement is not supportable by fact. Second, the mitigation measures proposed are already in effect as a requirement of the previous CUP. Third, the proposed identifiable measures only apply to the mobile

64-9

sources which are responsible with a small percentage of the GHG emitted. The bulk of the gas emitted is biogenic, for which the Project Proponent proposes NO identifiable, measurable mitigation measures.

64-9  
cont'd

**Therefore we assert that GHG impacts remain a significant impact and have not been mitigated. This EIR cannot be legally certified under CEQA with such a scenario.**

#### **VII. Burden of Proof**

Expansion of this landfill will require a burden of proof, both for CEQA over-riding considerations and a County Conditional Use Permit. The burden of proof should include an evaluation of the need for this expansion. An evaluation should also be made of need based on the diminishing trash delivered to County landfills as reported in the Public Works Department's last Annual Report.<sup>13</sup>

64-10

Rather than expanding the Chiquita Canyon Landfill, we urge you to fulfill your Reduced Waste goals and proceed with a No Project Alternative. We appreciate your consideration of these comments, and we look forward to reviewing the re-circulated draft of the DEIR should the Project Proponent continue to decide it wants to proceed with an updated version of this proposal. Please do not hesitate to contact us if you have any questions about these comments.

Sincerely,



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<sup>13</sup> County of Los Angeles Countywide Integrated Waste Management Plan, 2010 Annual Report Countywide Summary Plan & Countywide Siting Element, County of Los Angeles Department of Public Works, October 2011

# Letter No. 64

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## Response to Comment No. 64-1

Please see Topical Response #18 for a discussion of Project Alternatives and Topical Response #19 for a discussion of Project Need.

## Response to Comment No. 64-2

Please see revised Chapter 18, Project Alternatives, of the Partially Recirculated Draft EIR, which evaluates an expanded list of alternatives to the Proposed Project. Also please see Topical Response #18, Project Alternatives.

## Response to Comment No. 64-3

Please see revised Chapter 18, Project Alternatives, of the Partially Recirculated Draft EIR, which evaluates a Rail Haul Transport to Out-of-County Landfills alternative. Please also see Topical Response #18, Project Alternatives.

## Response to Comment No. 64-4

Please see revised Chapter 18, Project Alternatives, of the Partially Recirculated Draft EIR, which evaluates two reduced capacity landfill alternatives. Please also see Topical Response #18, Project Alternatives, and Topical Response #19, Project Need.

## Response to Comment No. 64-5

The potential environmental impacts of the Proposed Project were thoroughly addressed in the Original Draft EIR and Partially Recirculated Draft EIR. Revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR provides an updated discussion of potential air quality impacts, and updates the health risk assessment for the Proposed Project.

Please also see Topical Response #1, Air Quality, and Topical Response #21, Public Health.

## Response to Comment No. 64-6

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR.

## Response to Comment No. 64-7

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR.

## Response to Comment No. 64-8

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR.

## Response to Comment No. 64-9

Please see revised Chapter 12, Greenhouse Gas Emissions and Climate Change, of the Partially Recirculated Draft EIR.

## Response to Comment No. 64-10

Please see Topical Response #18 for a discussion of Project Alternatives and Topical Response #19 for a discussion of Project Need.

## Land Use, Chapter 4:

### **Section 4.3.1 .2 – County of Los Angeles General Plan – Compliance**

**“The land use element sets forth countywide policy for the general location and intensity of land use. The land use element also reinforces the General Plan’s policies of conserving natural resources and protecting population from natural hazards by careful management of development in sensitive areas. Objectives and policies relevant to the Proposed Project are as follows:”**

The County of Los Angeles General Plan includes other applicable sections for this projection under the “Policy” section that should be integrated into the Environmental Impact Report to comply with the full inventory of land use policies contained in the General Plan:

- 7. *“Assure that the new development is compatible with the natural and man-made environment by implementing appropriate locational controls and high quality design standards.”*

*Published by the Attorney General of The State of California:*

*“Under CEQA, human beings are an integral part of the “environment.” An agency is required to find that a “project may have a ‘significant effect on the environment’” if, among other things, “[t]he environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly[.]” (Pub. Res. Code, § 21083, subd. (b)(3); see also CEQA Guidelines, 2 § 15126.2 [noting that a project may cause a significant effect by bringing people to hazards].) As set out below, by following well-established CEQA principles, local governments can help achieve environmental justice.”<sup>1</sup>*

- 8. *Protect the character of residential neighborhoods by preventing the intrusion of incompatible uses that would cause environmental degradation such as Excessive noise, noxious fumes and, glare, shadowing and traffic.”*
- 13. *“Prevent inappropriate development in areas that are environmentally sensitive or subject to severe natural hazards...”*
- 29. *“Improve the land use decision-making process by closely monitoring and evaluating the cumulative impacts of individual projects and by modernizing Development regulations.”*

<sup>1</sup> (Attorney General 2010)

1

65-1

The Chiquita Canyon Landfill Master Plan Revision is ambitious in its scope. Potential air-quality impacts will be significant to the current and future populations surrounding the landfill. A comprehensive, regional study near the landfill has yet to be performed to answer questions of air quality from current conditions before determining the safety of the proposed Project or considering mitigations to protect the environment and people. Doubling the operation of the Chiquita Canyon Landfill will increase the potential for adverse effects. The County should ensure there is relevant data to determine adverse effects and risks for the Project.

65-2

#### **Section 4.3.1.4 –Santa Clarita Valley Area Plan**

**“Specifically, industry use must be clean, nonpolluting, with no offensive odors, and visually attractive.”**

The Santa Clarita Area Plan has guidelines for landfills in Chapter 2 which addresses the issue of the Chiquita Canyon Landfill’s impacts on residents of Val Verde:

*“...the proposed expansion of the Chiquita Canyon Landfill has raised concerns by residents of nearby Val Verde, who are often impacted by wind-borne odors and truck traffic. Compatibility of landfills with adjacent development must continue to be addressed.”*

Neither the City of Santa Clarita, nor the County of Los Angeles have proper sampling or data to determine the current impact of the landfill. The monitoring of air quality is not sampled in an area local to Val Verde and there are no air-quality monitors or ambient air-monitoring programs in Val Verde<sup>2</sup>. AQMD monitoring for the Chiquita Canyon Landfill is performed by stations in: Santa Clarita; Burbank; Reseda and Newhall. Before the County decides if the landfill expansion is in the community’s interest or if it will result in unacceptable levels of pollution, relevant studies of the older neighborhoods of Val Verde and Live Oak should be completed before mitigation measures are discussed.

65-3

2

The scope of the proposed expansion is not discussed in the EIR in terms of how it compares in operational sizes to other municipal waste facilities in the LA Region, State or Nation. At the rate of accepting *12,000 tons per day*, CCL will compete with the largest landfill in the Nation, Apex Landfill in Las Vegas, which accepts approximately *10,500 tons of trash daily*.<sup>3</sup>

As a side note, the lack of perspective information of this sort leaves conscientious residents, lawmakers and community liaisons out of the discussion. Most people cannot visualize what 12,000 tons of waste looks like, or how it will affect their health or property values.

#### **Section 4.5.2 – Surrounding Land Uses**

The Chiquita Canyon Landfill is surrounded Commercial Offices and a large Post Office facility; these buildings are part of the Valencia Commerce Center. The County should make every effort to assure that adverse air-quality conditions from the proposed Project do not interfere with OSHA laws.

65-4

<sup>2</sup> The Val Verde Community Advisory Committee recently purchased five methane alarms after many residents expressed health concerns at the quarterly meetings. The alarms do not record data and the

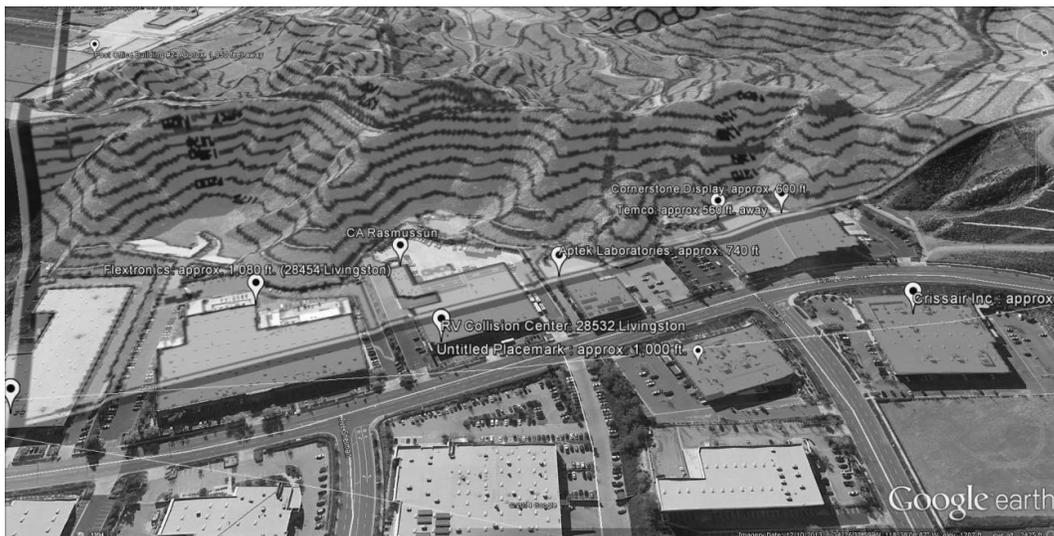
<sup>3</sup> (Sage 2014)

In addition, many new businesses will be required to implement costly mitigation monitoring at their own expense, per the County's Methane Mitigation Standards. The County has a duty to notify business owners and operators about the potential for their buildings to fall under the Methane Mitigation Standards if this project is approved.

Costs and implementation methods can be found at:

<http://dpw.lacounty.gov/epd/swims/OnlineServices/methane-mitigation-standards.aspx>

Proximity maps are included below, buildings that would qualify for MMS, are highlighted in pink:



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3



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4



### **Section 4.5.3 – Planned Surrounding Land Uses**

Under the title, “Decision Making,” in the County of Los Angeles General Plan, issues of conflicting simultaneous development activity are addressed:

*“Governmental agencies do not always have sufficient information to monitor development activity on a cumulative bases, particularly during periods of rapid urban growth. As a result, land use decisions are often made incrementally. Considered individually, these decisions respond to short term market needs, and may appear to create desirable new use patterns. Cumulatively, however, they may create undesirable long-term social, economic and environmental impacts. Improved information systems and monitoring tools are urgently needed to guide the land use decision-making process [...]*

65-5

*Local planning programs sometimes have competing objectives, and at times, the land use decisions of one jurisdiction have external impacts. Conflicts, when they occur, need to be resolved through a cooperative process that is equitable to all parties. At present, no fully adequate mechanisms exist. Although the County’s authority is limited, it can provide the necessary leadership to improve interjurisdictional coordination. Both improved tools and cooperative institutional arrangements are necessary if our remaining land resources are to be utilized wisely.”*

5

Note that the proposed lateral expansion footprint of this Draft EIR conflicts with the conditions of the Newhall Ranch Conditional Use Permit which has been approved by Los Angeles County:

1. Siting new structures within 1,000 feet of landfill perimeter violates the Los Angeles County Building Code Ordinance which states:

CALIFORNIA BUILDING CODE VOLUME 1 Title 26 Los Angeles County Code 110.3

*"Fills Containing Decomposable Material: Permits shall not be issued for buildings or structures regulated by this Code within 1,000 feet (304.8 m) of fills containing rubbish or other decomposable material unless the fill is isolated by approved natural or artificial protective systems or unless designed according to the recommendation containing in a report prepared by a licensed civil engineer."*

65-6

Portions of the Homestead Ranch neighborhood of the Newhall Ranch project lie less than 1,000 feet from the 26.9-acre proposed lateral expansion area of the landfill. The close proximity of this proposed lateral expansion area will conflict with the placement of approved buildings and prevent their construction per County law.



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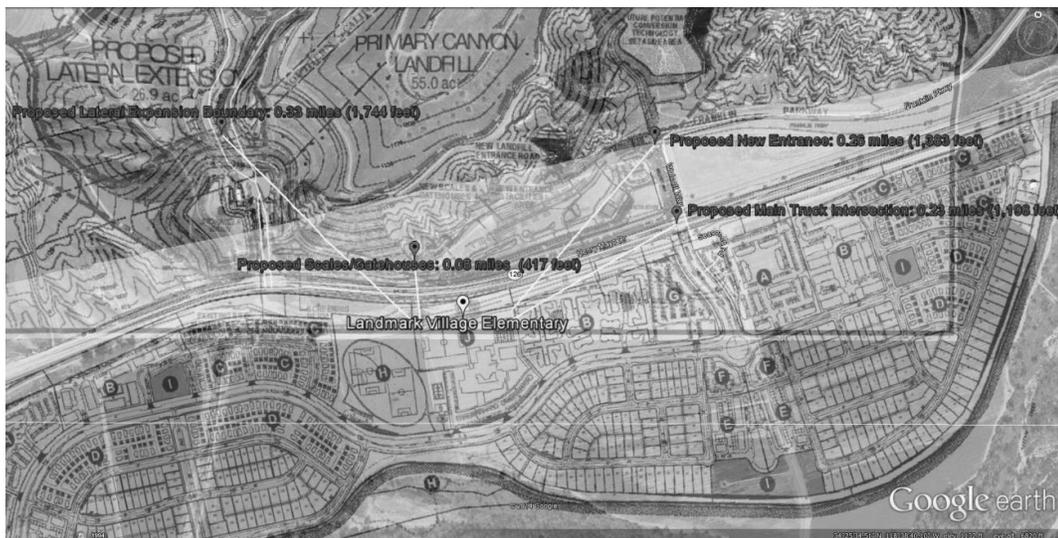
6

There are no mitigation measures in the Draft EIR (Chapter 4.7) to address conflicts with Title 26 of Los Angeles County Ordinances with regard to the 1,000 foot required setback from a landfill. This is a major oversight since provisions of this DEIR conflict with the pending Homestead Village at the Newhall Ranch Project (TR060678). These pending developments have planned structures that lie within 1,000 feet of the landfill perimeter.

The footprint of the proposed 26.9-acre lateral expansion area should be scaled back to comply with Los Angeles County Building Code Ordinance - Title 26, 110.3, and the required 1,000 foot buffer zone.

The issue of incompatible Land Use applies to this Project. While not noted in the Draft EIR, there is a County-approved sensitive receptor planned to be built approximately 0.08 miles from the landfill's intake and weighing stations. It is the Landmark Village Elementary school. Existing law requires that the lead agency consult with prescribed agencies to identify facilities that might reasonably be anticipated to emit hazardous materials within 1/4 mile of a school site. This presents a health zoning conflict that the County needs to rectify in order to assure compatibility with current laws and the County of Los Angeles General Plan.

The proposed new entrance will be across the street from a planned elementary school and residential areas, potentially exposing the residents to excessive amounts of noise, traffic and air pollution from the diesel intake trucks. The EIR needs to address impacts of this intersection in an in-depth manner that includes accurate data for projected traffic, contaminants, noise, population and health effects.



Landmark Village Elementary School location, with superimposed map images from the Landmark Village EIR.

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Proposed view of Wolcott Way found in the Newhall Ranch EIR. The photo is taken from the perspective of the landfill main entrance. In the distance is a projection of how Landmark Village will visually appear.

7

**Need for Tiered EIR and a Complete Assessment of Cumulative Effects:**

Because there are many concurrent approved and pending developments for the surrounding parcels near the proposed Project, the County should be required to produce a tiered EIR in accordance to CEQA guidelines and statutes.

The potential for further land use conflict in this high-growth area is significant. The impacts of zoning conflicts in Chapter 3 of the DEIR, including an updated map which shows the entire area around the landfill having approved and pending residential and commercial areas. The landfill is mainly zoned as Heavy Industrial and its proposed scope is not compatible with zoning laws and regulations that promote welfare and safety.

65-7

CALIFORNIA ZONING CODE 22.12.060 Progressive zoning of unincorporated area.  
*"It is further declared that the progressive adoption, by ordinance, of Official Plans of the Master Plan of Land Use, placing various portions of such unincorporated territory in the respective zones applicable thereto as soon as the due and careful consideration by the commission and by the board of supervisors will permit, is intended to result eventually in a comprehensive and well-considered plan of location and distribution of the various industries, businesses and population of the entire unincorporated area of the county of Los Angeles and in due relation with existing plans in the incorporated portions of the county."*

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**Chapter 3 of the DEIR states:**

**"The cumulative projects discussed in Chapter 3.0, General Setting and Resource Area Analysis, would likely result in significant changes to land uses in the vicinity of CCL. A combination of residential, commercial, open space, public, and industrial uses are planned within the vicinity of the Proposed Project. However, the Proposed Project would maintain the intended land use of CCL, would not conflict with applicable land use plans or adopted policies, and would not result in impacts related to land use. Therefore, the Proposed Project, when combined with reasonably foreseeable projects in the project vicinity, would not incrementally contribute to cumulative changes to land use, and no cumulative impacts would result.**

65-8

**No cumulative impacts would result from the implementation of the Proposed Project; therefore, no mitigation measures are required."**

**This is incorrect** and should be amended in the Draft EIR. Updated information should include more in-depth research that does not conflict with current projects.

8





65-9

There are no mitigation measures in the Draft EIR (Chapter 4.7) to address conflicts with Title 26 of Los Angeles County Ordinances with regard to the 1,000 foot required setback from a landfill. **This is a major oversight**, since provisions of this DEIR conflict with the pending Homestead Village at the Newhall Ranch Project (TR060678). These pending developments have planned structures that lie within 1,000 feet of the landfill perimeter. The footprint of the proposed 26.9-acre lateral expansion area should be scaled back to comply with Los Angeles County Building Code Ordinance - Title 26, 110.3, and the required 1,000 foot buffer zone.

9

## Cultural Resources, Chapter 9:

### **Bowers Cave**

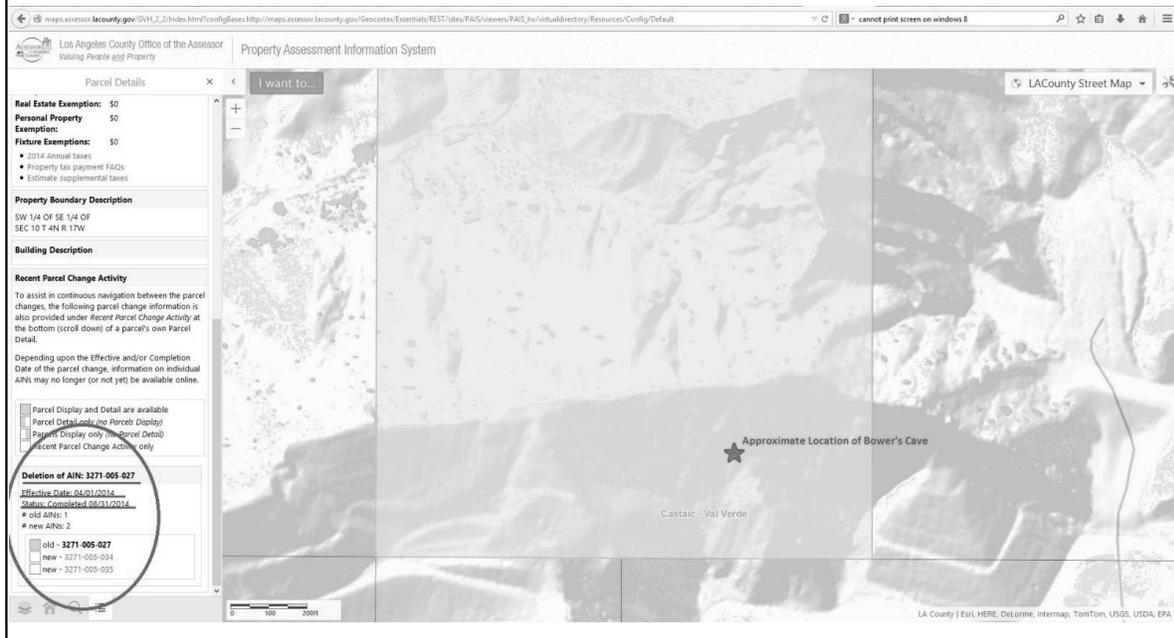
Approximately one year ago, CCL solicited the purchase of adjacent acreage from a Cambodian family in Val Verde. The family member who primarily resides on the ranch property, named Tree, has a limited grasp of English and is illiterate. In my contact with them and visits to their home, I have gathered that they have meager financial resources, and most certainly live below the poverty line.

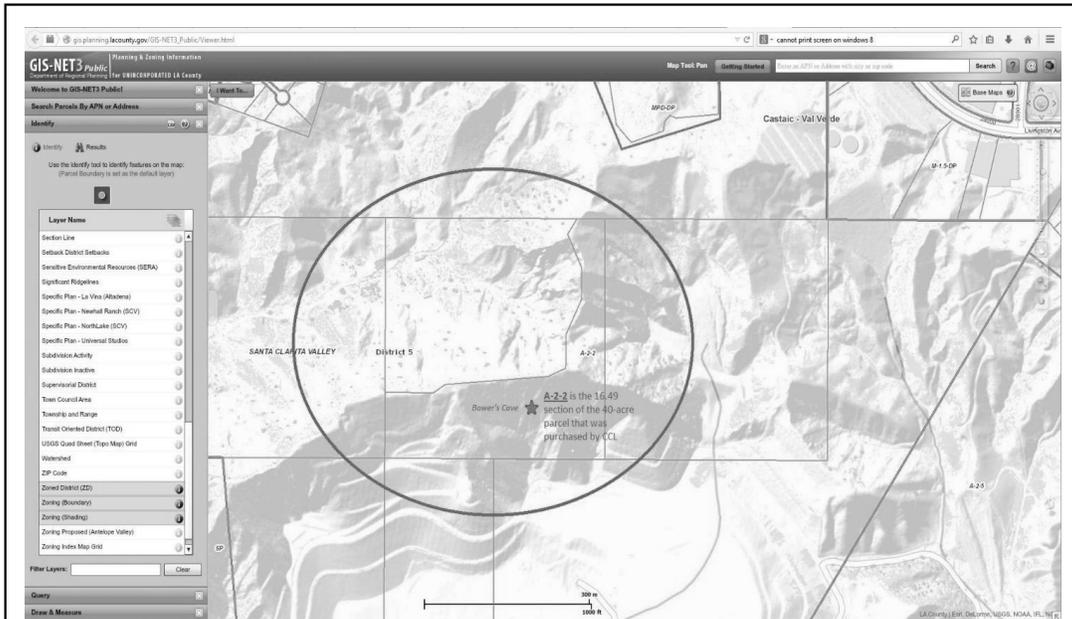
The landfill offered the family \$50,000 for approximately 16.49 acres of an intact 40-acre parcel. The lot division was granted less than a month ago, on August 31, 2014. The property that was purchased contained Bowers Cave and a portion of an area with an unstable landslide area. The presence of the cave was not disclosed to the owners at the time of the purchase. With the family's limited knowledge of the English language, compounded with illiteracy issues, I believe they did not understand the value of the land or its contents.

The purpose of including this is to document the transaction for future use of research and request that all related documents for the purchase of this land be included in the EIR.

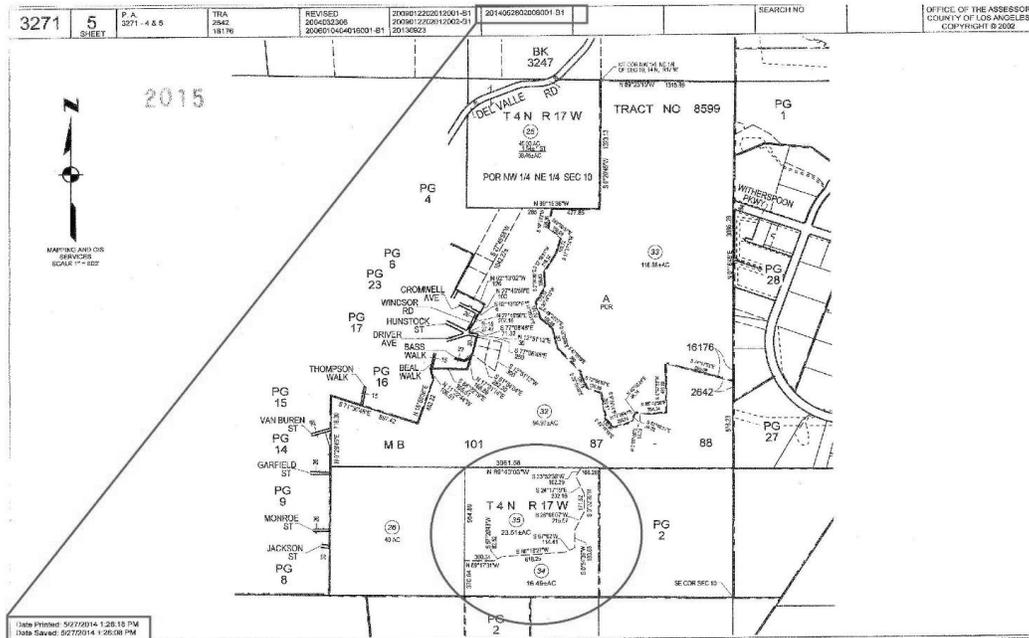
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New divided parcel map, with new AIN 3271-005-03

11

## Environmental Justice and Socioeconomics, Chapter 16.0:

### **Responsibilities of the Lead Agency to Identify, Comply and Enforce Environmental Justice Concerns and Regulations**

The purpose of environmental justice law is to ensure that all California residents have equal access clean air and quality of life. On the 30<sup>th</sup> anniversary of the Civil Rights Act of 1964, President Bill Clinton issued *Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. The Executive Order was written as extension of the Civil Rights Act, in order to address on the environmental and human health effects of federal actions on minority and low-income populations with the goal of achieving environmental protection for all communities – Environmental Justice laws are *Civil Rights* laws. The twenty-year anniversary of EO 12898 took place at the beginning of this year, on February 10, 2014.

The State of California passed the *California Environmental Quality Act* more than forty years ago. CEQA requires that agencies disclose and evaluate significant environmental impacts of proposed projects. As the Lead Agency for the *Chiquita Canyon Landfill Master Plan Revision*, the County of Los Angeles is responsible for ensuring compliance with CEQA and its implied provisions that guarantee environmental quality for minority and low-income populations:

**Excerpts from “*Environmental Justice at the Local and Regional Level Legal Background*,” published by the Office of the Attorney General for the State of California:**

*“Government Code section 11135, subdivision (a) provides in relevant part:*

*‘No person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state....’*

*While this provision does not include the words “environmental justice,” in certain circumstances, it can require local agencies to undertake the same consideration of fairness in the distribution of environmental benefits and burdens discussed above. Where, for example, a general plan update is funded by or receives financial assistance from the state or a state agency, the local government should take special care to ensure that the plan’s goals, objectives, policies and implementation measures (a) foster equal access to a clean environment and public health benefits (such as parks, sidewalks, and public transportation); and (b) do not result in concentration of polluting activities near communities that fall into the categories defined in Government Code section 11135.*

The County of Los Angeles has failed its duty to ensure environmental equality and fair treatment of all people for the proposed Project, R2004-00559-(5). The County has also failed to identify the community of Val Verde’s status as a population that is defined under *Government Code section 11135*.

65-11

1

**Excerpts from “Environmental Justice at the Local and Regional Level Legal Background,” published by the Office of the Attorney General for the State of California:**

“[E]nvironmental justice” means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. (Gov. Code, § 65040.12, subd. (e).

“Fairness in this context means that the benefits of a healthy environment should be available to everyone, and the burdens of pollution should not be focused on sensitive populations or on communities that already are experiencing its adverse effects.”<sup>1</sup>

“[M]ajor consideration [must be] given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian.” (Id. at subd. (a).)

We must “[t]ake all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.” (Pub. Res. Code, § 21001, subd. (b).)

“Specific provisions of CEQA and its Guidelines require that local lead agencies consider how the environmental and public health burdens of a project might specially affect certain communities.”

The County and the Board of Supervisors have been made aware of the community’s objection regarding the exclusion of Environmental Justice consideration during the comment period for this Draft EIR. The community of Val Verde has well-known origins as a minority community. Val Verde was founded during the era of racial segregation during the 1920s.<sup>2,3</sup> Today, Val Verde continues to be a home to minorities, with a 76.6%-concentration, according the latest 5-year US Census American Community Survey (2008-2012).

Chapter 16 findings of the Draft EIR considers the issue of Environmental Justice to be non-applicable to the proposed Project. This finding is inaccurate and unacceptable. Placing potentially the Nation’s largest landfill next to one of the Nation’s poorest communities is a blatant violation of CEQA and the Civil Rights Act of 1964.

In order to defend Val Verde’s civil rights, fair treatment and to secure access to a healthy environment, a complaint was filed to the Environmental Justice Division at the California Environmental Protection Agency at the time these EIR comments were submitted to the County of Los Angeles.

**Recommendations:**

1. Take emergency action to identify Environmental Justice issues and identify Val Verde, the closest community to the landfill, as a population that is defined under *Government Code section 11135*. Tools and methodology to make this determination should include *Approaches to Identifying Disadvantaged Communities*, published by California Environmental Protection Agency’s Office of Environmental Health Hazard Assessment. The text of this guideline can be found here:

<http://oehha.ca.gov/ei/pdf/ApproachesIdentifyDisadvantagedCommunitiesAug2014.pdf>

<sup>1</sup> (Attorney General 2010, Attorney General 2010)

<sup>2</sup> (Dominguez 2012)

<sup>3</sup> (William-Ross 2008)

Every effort to update and compiled health and environmental data specific to the community of Val Verde should be made.

2. Even though the County of Los Angeles is the most populous county in the Nation, it does not have a dedicated agency or personnel to solely address issues and compliance regarding Environmental Justice. The City of Los Angeles has its own Environmental Justice Unit. Given the large scale and scope of the proposed Project and its potential to adversely affect the environment and minority communities, the addition of County personnel or County consultant should be made available to address Environmental Justice compliance for this project. The planners and agencies who have are currently responsible for addressing Environmental Justice issues are not experts in Environmental Justice or Civil Rights laws, considerations and compliance. This places an unfair burden and on County employees who are not qualified to address these issues, and also opens the County to liability if non-compliance results.

Anyone who performs these duties should:

- Have a professional and educational history in Environmental Justice, and expert-knowledge in its application of municipal law.
- Be a full-time or near full-time employee who will be available on a regular basis to address Environmental Justice compliance to the Petitioner, their consultants, County agencies, County employees, enforcement agencies, municipalities, cities in Los Angeles County, County advisory groups and the general public.
- Have the power to make recommendations to Regional Planning and other departments and agencies with regard to the proposed Project.

65-13  
cont'd

### **Responsibility of the Enforcement Agencies to Identify, Comply and Enforce Environmental Justice Concerns and Regulations**

Because Enforcement Agencies and the State of California have their own regulations regarding Environmental Justice, every effort should be made for compliance and identification Environmental Justice issues relevant to this Project.

#### **Recommendations:**

1. Notify all Agencies whose scope includes provisions and/or enforcement of the proposed Project that their own Environmental Justice regulations need to be applied to The Project:
2.
  - a. The California Air Resources Board
  - b. The South Coast Air Quality Management District
  - c. CalRecycle
  - d. California Environmental Protection Agency
  - e. California Energy Commission
  - f. California Resources Agency
  - g. California State Lands Commissions
  - h. California Department of Transportation
3. Request input from above agencies on how to accurately collect and compile data, using historically- efficacious methods and calculations to identify environmental threats to small communities and also to

3

65-14

- assess the general health of the population, the local air and soil quality and other health or socioeconomic factors that need to be considered for the proposed Project.
4. Create an operational method to streamline input from Enforcement Agencies for the purpose of R2004-00559-(5)
  5. Confer with the State regarding SB 535 and the potential of identifying Val Verde as a community that would benefit from its provisions.

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**Sections 16.2, 16.4.1 – Methodology**

**“The study area for this resource is defined as Los Angeles County, including the Val Verde Census Designated Place. This evaluation examined baseline population and housing data for these jurisdictions and analyzed potential impacts resulting from implementation of the Chiquita Canyon Landfill (CCL) Master Plan Revision (Proposed Project). Data utilized in this analysis consisted of current and forecasted demographic data obtained from the U.S. Census Bureau and City Data; data from the California Department of Education were also analyzed. The significance of the impacts was assessed in accordance with criteria presented in Appendix G of the CEQA Guidelines.” Section 16.2**

CEQA guideline assessments for the Project will require reevaluation. The Petitioner did not employ proper methodology to determine if the Project had the potential to affect a socioeconomically-protected class. The responsibility of determining which communities fall under State and State agency Environmental Justice laws and regulations falls on the local agency under Government Code section 11135, subdivision

4

CEQA states:

*“[M]ajor consideration [must be] given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian.” (Id. at subd. (g).) We must “[t]ake all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.” (Pub. Res. Code, § 21001, subd. (b).)*

65-15

The Attorney General’s office of the State of California notes:

*“[E]nvironmental justice” means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. (Gov. Code, § 65040.12, subd. (e).) Fairness in this context means that the benefits of a healthy environment should be available to everyone, and the burdens of pollution should not be focused on sensitive populations or on communities that already are experiencing its adverse effects.*

*Many local governments recognize the advantages of environmental justice; these include healthier children, fewer school days lost to illness and asthma, a more productive workforce, and a cleaner and more sustainable environment. Environmental justice cannot be achieved, however, simply by adopting generalized policies and goals. Instead, environmental justice requires an ongoing commitment to identifying existing and potential problems, and to finding and applying solutions, both in approving specific projects and planning for future development.”*

Specific provisions of CEQA and its Guidelines require that the Petitioner and the local lead agencies consider how the environmental and public health burdens of a project might specially affect certain communities. The use of the 2010 Census data and an older American Community Survey 5-year Estimates in order to “analyze potential effects” is misleading because it does not provide an honest or accurate depiction of the socioeconomic picture of the community of Val Verde. The 2008-2012 American Community Survey was widely available at the time this EIR was being prepared.

Would the Petitioner and the County respond to why this data set was used instead of the more recent one?

The American Community Survey 5-year Estimates are more comprehensive with respect to the quality of the data that are collected – and have the capacity to provide a deeper understanding of a community or region. The US Census publishes a guideline regarding data usage. It can be found at this URL:

[http://www.census.gov/acs/www/guidance\\_for\\_data\\_users/estimates/](http://www.census.gov/acs/www/guidance_for_data_users/estimates/)

In addition, a newer 3-year study was just released covering the years 2011-2013.

The use of the 2010 Census data and an older American Community Survey 5-year Estimates in order to “analyze potential effects” is misleading because it does not provide an honest and accurate depiction of the socioeconomic picture of the community of Val Verde.

Please see the below chart:

**DISTINGUISHING FEATURES OF ACS 1-YEAR, 3-YEAR, AND 5-YEAR ESTIMATES**

1-year estimates	3-year estimates	5-year estimates
12 months of collected data	36 months of collected data	60 months of collected data
Data for areas with populations of 65,000+	Data for areas with populations of 20,000+	Data for all areas
Smallest sample size	Larger sample size than 1-year	Largest sample size
Less reliable than 3-year or 5-year	More reliable than 1-year; less reliable than 5-year	Most reliable
Most current data	Less current than 1-year estimates; more current than 5-year	Least current
Best used when	Best used when	Best used when
Currency is more important than precision	More precise than 1-year, more current than 5-year	Precision is more important than currency
Analyzing large populations	Analyzing smaller populations	Analyzing very small populations
	Examining smaller geographies because 1-year estimates are not available	Examining tracts and other smaller geographies because 1-year estimates are not available

Chart retrieved from: [http://www.census.gov/acs/www/guidance\\_for\\_data\\_users/estimates/](http://www.census.gov/acs/www/guidance_for_data_users/estimates/)

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**Recommendations:**

1. Use the most recent data from the US Census to determine the socioeconomic factors for the community of Val Verde:
  - a. 2011-2013 American Community Survey 3-year Estimates
  - b. 2008-2012 American Community Survey 5-year Estimates
2. Reflect the updated information in the Draft EIR and use the data to determine Val Verde's status as an affected population pursuant to *Government Code section 11135*.

65-16

**Sections 16.5.2.1 – Classification of “Affected Population”**

**“For the purpose of this evaluation, because CCL is a countywide facility, the minority percentage of the general population of the County of Los Angeles is used as the basis for comparison in determining if a minority population is considered to exist.”**

Using County of Los Angeles statistics for affected areas based on the point that the entire County would benefit from the Project approval is highly flawed and illogical. The guidelines to determine “affected populations” do not include potential benefits to a wide region. The guidelines assist in determining the adverse effects for communities affected by nearby sources of pollution in relation to an adjacent area. Regionally, Val Verde is part of Santa Clarita and of Castaic. Data to determine if Val Verde has a disproportionate population of minorities and low-income should be compare to its region.

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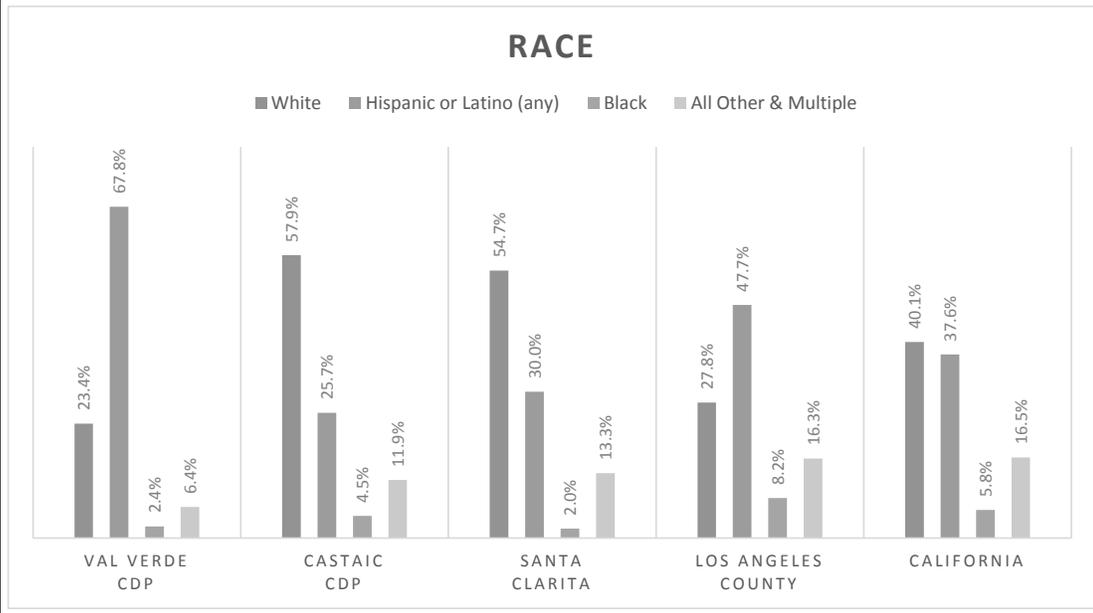
The County of Los Angeles is the poorest county in the State and one of the poorest in the Nation. Comparing the vast region of Los Angeles to determine if Val Verde is an effected population, does nothing to determine socioeconomic characteristics of Val Verde to its surrounding areas. This is an advantageous comparison for the Petitioner and should be removed from the EIR because it is misleading, inaccurate and has the potential to assist major violations of current civil rights laws that apply to this process.

65-17

In any case, even with the County comparison, the latest 5-year ASC data indicates that Val Verde has a greater percentage of minorities and a greater burden of poverty and low-income residents. One of the factors to determine if affected populations is level of education. This was missing from the Draft EIR. Per the latest 5-year data, 32.7% of Val Verde residents over the age of 25 do not have a high school degree. Level of education is an important determining factor for income, poverty, health and well-being and is closely correlated in the US Census ASC data.

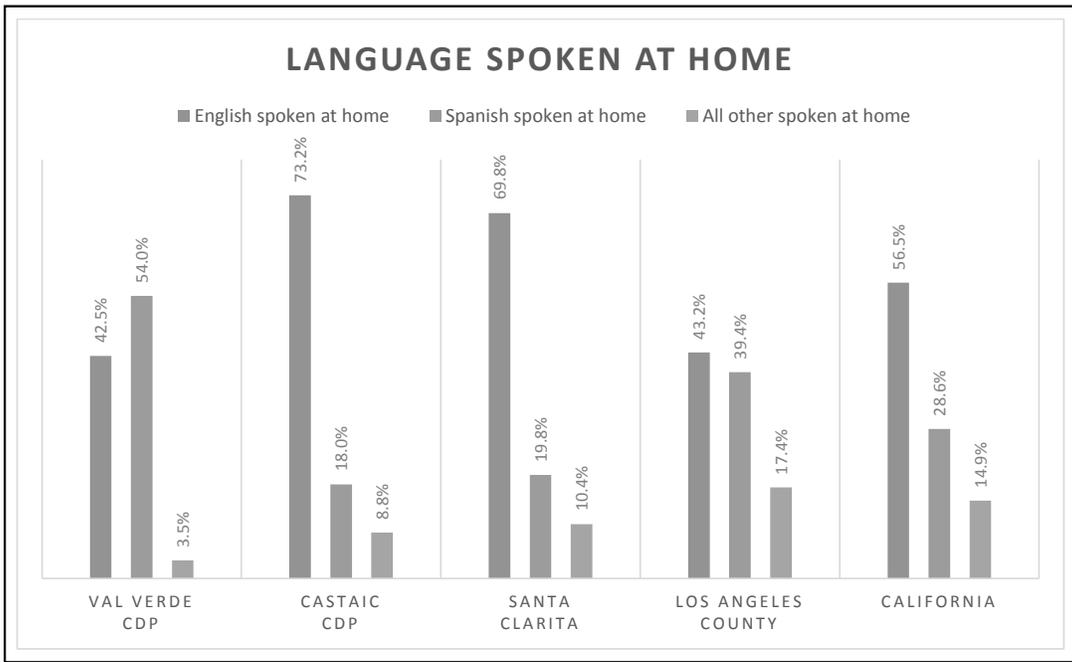
Furthermore, CEQA guidance states that population groups defined as minorities include: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic/Latino origin; or Hispanic/Latino. CEQA guidelines for evaluating potential adverse environmental justice effects indicate minority populations should be identified when either: 1) a minority population exceeds 50 percent of the population of the affected area, or 2) a minority population represents a “meaningfully greater increment” of the affected area population than the population of some appropriate larger geographic unit, as a whole.

Using recent data from the 2008-2012 American Community Survey 5-year Estimates, the following charts were created:

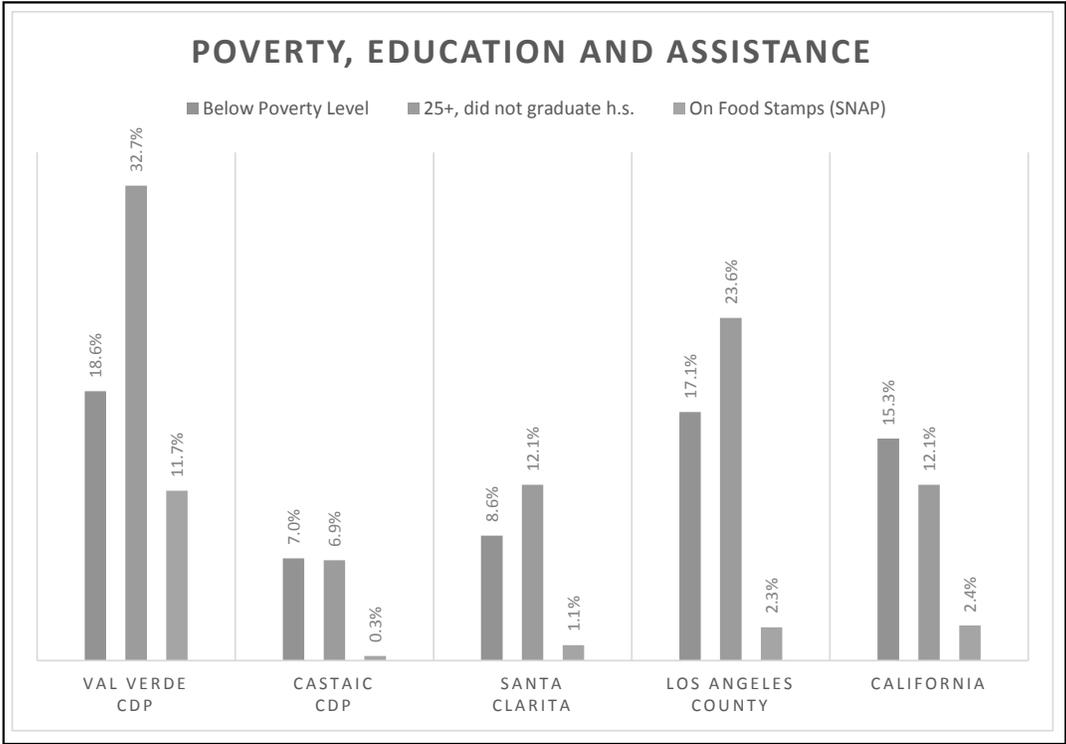


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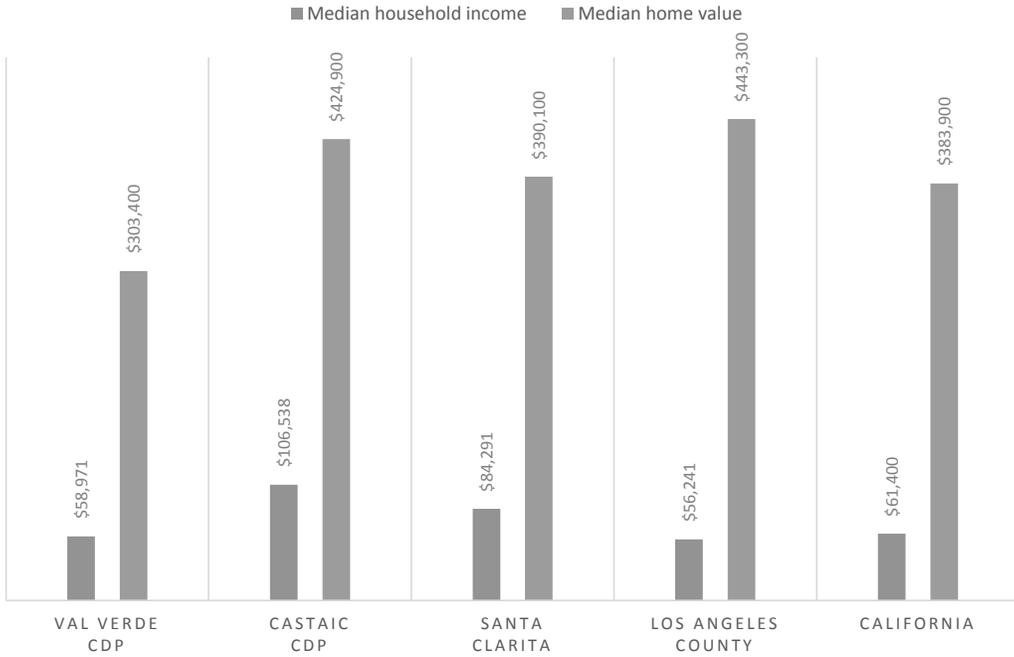


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## INCOME AND HOME VALUE



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2008-2012 American Community Survey	Val Verde CDP	Castaic CDP	Santa Clarita	Los Angeles County	California
Total Population	<b>2,442</b>	<b>18,610</b>	<b>175,922</b>	<b>9,840,024</b>	<b>37,325,068</b>
White	23.4%	57.9%	54.7%	27.8%	40.1%
Hispanic or Latino (any)	67.8%	25.7%	30.0%	47.7%	37.6%
Black	2.4%	4.5%	2.0%	8.2%	5.8%
All Other & Multiple	6.4%	11.9%	13.3%	16.3%	16.5%
Below Poverty Level	18.6%	7.0%	8.6%	17.1%	15.3%
25+, did not graduate H.S.	32.7%	6.9%	12.1%	23.6%	12.1%
English spoken at home	42.5%	73.2%	69.8%	43.2%	56.5%
Spanish spoken at home	54.0%	18.0%	19.8%	39.4%	28.6%
All other spoken at home	3.5%	8.8%	10.4%	17.4%	14.9%

	\$	\$	\$	\$	\$
Median household income	58,971	106,538	84,291	56,241	61,400
	\$	\$	\$	\$	\$
Median home value	303,400	424,900	390,100	443,300	383,900
Have Health Insurance	78.2%	90.7%	87.2%	77.8%	82.2%
On Food Stamps (SNAP)	11.7%	0.3%	1.1%	2.3%	2.4%
Foreign-born, citizen	7.0%	12.2%	10.9%	16.4%	12.5%
Foreign-born, not citizen	19.9%	4.9%	9.5%	18.9%	14.5%
				Los Angeles County	California
<b>2010 Census</b>	<b>Val Verde CDP</b>	<b>Castaic CDP</b>	<b>Santa Clarita</b>		
Total Population	<b>2,468</b>	<b>19,015</b>	<b>176,320</b>	<b>9,818,605</b>	<b>37,253,956</b>
Hispanic or Latino (any)	61.1%	24.8%	29.5%	47.7%	37.6%
White	29.9%	57.1%	56.1%	27.8%	40.1%
Black	4.0%	3.1%	2.9%	8.3%	5.8%
American Indian	0.2%	0.2%	0.2%	0.2%	0.4%
Asian	1.8%	11.2%	8.3%	13.5%	12.8%
All Other & Multiple	3.1%	3.6%	3.0%	2.5%	3.2%

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<b>Recommendations:</b>
<p>The County needs to protect the civil rights of the community of Val Verde as part of this process, in fact, they are mandated by CEQA to do so. Because the flawed and misleading methodology and the data in this report was used to deny civil and environmental rights of the people of Val Verde, the County should make a good-faith effort to temporarily and immediately suspend the EIR process until the Draft EIR can be amended to reflect accurate information. Not doing so puts the County in a position of vulnerability to legal action by the public and the State of California.</p> <p><u>Government Code section 11136 provides for an administrative hearing by a state agency to decide whether a violation of Government Code section 11135 has occurred. If the state agency determines that the local government has violated the statute, it is required to take action to "curtail" state funding in whole or in part to the local agency. (Gov. Code, § 11137.) In addition, a civil action may be brought in state court to enforce section 11135. (Gov. Code, § 11139.)</u></p> <ol style="list-style-type: none"> <li>1. Use more recent data such as: <ol style="list-style-type: none"> <li>a. 2011-2013 American Community Survey 3-year Estimates</li> <li>b. 2008-2012 American Community Survey 5-year Estimates</li> </ol> </li> <li>2. Reflect the updated information in the Draft EIR and use the data to determine Val Verde's status as an affected population pursuant to <i>Government Code section 11135</i>.</li> </ol>

65-18

**Sections 16.5.2.1 – Denial of Petitions to Address Environmental Justice Issues**

**Failure to provide “Opportunities to Participate”**

The lack of Spanish documentation falls on the County. The County was notified by community members of Environmental Justice concerns – and that the Draft EIR documents and notifications should have been in Spanish. Neither were provided. The County appears to side with the Petitioner’s stance that the community of Val Verde does not qualify for Environmental Justice consideration. According to the above tables, 54% of Val Verde residents speak Spanish at home.

65-19

In formulating its public outreach for the general plan update, the County should have evaluated whether regulations governing equal “opportunity to participate” and requiring “alternative communication services” (e.g., translations) apply. (See Cal. Code Regs., tit. 22, §§ 98101, 98211.)

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Despite evidence that suggests that the socioeconomic characteristics of Val Verde qualify the community for Environmental Justice consideration, the County of Los Angeles denied requests for extensions of the public comment period.

**Recommendation:**

The failure to “provide equal opportunities” and “alternative communication services” is not in compliance with CEQA. The County should immediately suspend the comment period deadline in order to allow for time to translate key documents of the Draft EIR into Spanish. No other action is likely to satisfy the letter and spirit of applicable Environmental Justice laws and regulations such as CEQA and Gov Code 11135.

65-20

Failure to comply will make the County of Los Angeles vulnerable to legal action.

*Timeline of known communication with the County of Los Angeles regarding Environmental Justice issues with regard to lack of Spanish translation follows:*



**Citizens for Chiquita Canyon Landfill Compliance**  
info@chiquitalandfill.net  
www.chiquitalandfill.net

#65 - Attachment

9-2-14

Attn: Honorable Supervisors  
Los Angeles County Board of Supervisors  
500 W. Temple St.  
Los Angeles CA 90012

**Re: Chiquita Canyon Landfill Expansion Draft Environmental Impact Report**  
**Project No. R2004-00559-(5) SCH No. 2005081071**

**Request for Public Review Process to Start Over**

Honorable Supervisors,

Citizens for Chiquita Canyon Landfill Compliance request the **Chiquita Canyon Landfill Master Plan Revision Draft Environmental Impact Report (DEIR)** [Project No. R2004-00559-(5)] proposal process be started over. The request is made on the grounds that literature pertinent to the proposal including the environmental report as well as notices of public hearings and meetings are only being made available in English and much of the surrounding community is not being notified of the proposal at hand.

The request for translation of documents comes according to the 2012 U.S. Census American Community Survey of 58.44% of Val Verde residents are Spanish speaking at home.<sup>1</sup> The proposed expansion will also greatly affect the population to the east of the landfill where the natural barrier is at its lowest.<sup>2</sup> Many of these residents and employees are not aware of the landfill proposal even though it is slated to become the largest landfill in California<sup>3</sup> and one of the largest in the U.S.<sup>4</sup>

The current process neglects our non-english speaking neighbors as well as a population which will be greatly impacted by this expansion. Citizens for Chiquita Canyon Landfill Compliance believe it is imperative that the community is fully informed and given adequate time to comment on this detrimental threat to our community.

We therefore call on the county to start the permit process from the beginning, with proper translation of notices and environmental review and permit documents in order to ensure that all residents, regardless of ethnicity or language spoken, can participate in the public process as is our right.

Thank you in advance for granting this request.

Sincerely,

<sup>1</sup> <http://www.usa.com/val-verde-ca-population-and-races--historical-language-spoken-at-home-data.htm>

<sup>2</sup> [http://chiquitalandfill.net/1997-conditional-use-permit/maps/expansion\\_east/](http://chiquitalandfill.net/1997-conditional-use-permit/maps/expansion_east/)

<sup>3</sup> [http://oclandfills.com/landfill/active/olindalandfill/olinda\\_q\\_n\\_a](http://oclandfills.com/landfill/active/olindalandfill/olinda_q_n_a)

<sup>4</sup> <http://www.forbes.com/2010/10/13/los-angeles-las-vegas-business-energy-biggest-landfills.html>

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September 10, 2014

Iris Chi and Paul McCarthy  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012  
Sent via mail and email to pmccarthy@planning.lacounty.gov

**Inadequate and Defective Public Notice and Denial of Opportunities for Meaningful Public Participation Opportunities for Spanish-Speaking Residents on the Chiquita Canyon Landfill Permit Process**

I am writing on behalf of our constituents living near the Chiquita Canyon Landfill. We are very concerned that the Los Angeles County Department of Regional Planning has failed to provide adequate notice to the many Spanish-speaking residents living near the landfill, and has completely denied these residents meaningful opportunities to participate in the environmental review process.

It is a clear fact that a large percentage of nearby residents are monolingual Spanish speakers, yet not one page of permit documents, including the Draft Environmental Impact Report, was translated into the language spoken by so many residents. In addition, we have been informed that no Spanish language notices were mailed to residents.

The county's failure to provide adequate notice and its failure to translate even one page of any permit or environmental review document has effectively and directly denied a large percentage of affected residents their legal right to meaningful participation in the permit process. As Spanish speaking residents did not receive effective notice and are unable to read the permit documents including the DEIR, they cannot participate in the process. This is particularly serious as the people of color and Spanish speakers who make up a significant percentage of local residents would also bear the disparate burden of a landfill expansion.

As a likely recipient of state and federal funding, your agency is subject to California Government Code 11135 and Title VI of the US Civil Rights Act. These civil rights laws prohibit recipients of state and federal funding from taking actions that have a discriminatory and disparate impact on people of color and Spanish-speakers. The failure to provide effective notice and meaningful public participation opportunities to the many Spanish speaking residents is therefore a violation of applicable civil rights laws.

Therefore, the permit process and current public comment period is invalid and must be stopped immediately until there is proper notice, adequate translation of key documents, and a real and meaningful opportunity for all residents to participate in the process. We thus call on the County to immediately cancel the current so-called public comment period. We look forward to your response and compliance with civil rights laws.

For health and environmental justice,

Bradley Angel, Executive Director

Cc Matt Rodriguez, Cal EPA Secretary  
Arsenio Mataka, Cal EPA Assistant Secretary for Environmental Justice

Greenaction for Health and Environmental Justice  
559 Ellis Street, San Francisco, CA 94109  
Phone: (415) 447-3904 Fax: (415) 447-3905  
[www.greenaction.org](http://www.greenaction.org)

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FW: LA County not in compliance with civil rights requirements: Lack of adequate notice and failure to tran...

On 9/29/2014 9:53 AM, Iris Chi wrote:

Mr. Bradley Angel,

Thank you for your comments. We reviewed our processes and we are in compliance with the State's notification requirements. Please note that the public review period has been extended to October 23, 2014.

Notice of Time Extension:  
[http://planning.lacounty.gov/assets/upl/case/project\\_r2004-00559\\_eir-notice-ext2.pdf](http://planning.lacounty.gov/assets/upl/case/project_r2004-00559_eir-notice-ext2.pdf)

Thank you,

**Iris Chi, AICP**  
 Planner  
 Zoning Permits North  
 Department of Regional Planning  
 320 West Temple Street  
 Los Angeles, CA 90012  
 (213) 974-6443  
<http://planning.lacounty.gov>  
[ichi@planning.lacounty.gov](mailto:ichi@planning.lacounty.gov)



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CONÓCELO

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FW: LA County not in compliance with civil rights requirements: Lack of adequate notice and failure to tran...

**From:** Bradley Angel <[bradley@greenaction.org](mailto:bradley@greenaction.org)>  
**Subject:** LA County not in compliance with civil rights requirements: Lack of adequate notice and failure to translate permit documents on Chaquita Canyon Landfill  
**Date:** September 29, 2014 at 4:12:20 PM PDT  
**To:** Iris Chi <[ichi@planning.lacounty.gov](mailto:ichi@planning.lacounty.gov)>, [greenaction@greenaction.org](mailto:greenaction@greenaction.org)  
**Cc:** Paul Mc Carthy <[pmccarthy@planning.lacounty.gov](mailto:pmccarthy@planning.lacounty.gov)>, Janai Leeb <[janai@thomasleeb.com](mailto:janai@thomasleeb.com)>, Arsenio Mataka <[AMataka@calepa.ca.gov](mailto:AMataka@calepa.ca.gov)>, [mrodriguez@calepa.ca.gov](mailto:mrodriguez@calepa.ca.gov) <[mrodriguez@calepa.ca.gov](mailto:mrodriguez@calepa.ca.gov)>

Dear Ms. Chi,

Unfortunately Los Angeles County is absolutely not in compliance with all requirements, specifically the requirements under Title VI of the US Civil Rights Act and California Government Code 11135 that recipients of state and federal funding such as LA County not take actions that have disparate and discriminatory impacts against Latino and Spanish speakers.

The proposed permit for the Chaquita Canyon garbage dump itself would have a prohibited impact. In addition, the County's failure and refusal to translate even one word of the environmental review document and the refusal to provide notice in the language so many residents speak is a violation of state and civil rights laws.

The county's public review period is not truly public as the county is effectively excluding many members of the affected public from the process. Please be advised that the failure to provide proper notice or to conduct a process accessible to the large percentage of residents who do not speak English will be challenged.

Please include this communication in the record for the public comment period.  
 Please also notify us of any and all opportunities for public comment on this project.

Bradley Angel  
 Greenaction for Health and Environmental Justice  
 559 Ellis Street, San Francisco, CA 94109  
[bradley@greenaction.org](mailto:bradley@greenaction.org)

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CONÓCELO

5

65-20  
cont'd

# Letter No. 65

Sara Sage

## Response to Comment No. 65-1

Compliance with the County of Los Angeles General Plan is discussed in Original Draft EIR Chapter 4, Land Use.

## Response to Comment No. 65-2

Each of the resource area discussions in EIR Chapters 4 through 15 address potential impacts to existing receptors (residential neighborhoods), as well as future receptors (cumulative projects). Potential impacts to air quality are discussed in revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR.

The County has determined that a regional study for current air quality conditions is not required in order to evaluate the potential impacts associated with the Proposed Project. Please also see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects, as well as Topical Response #21, Public Health.

## Response to Comment No. 65-3

Compliance with area land use plans is discussed in Original Draft EIR Chapter 4, Land Use. Please also see Topical Response #15, Land Use, and Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects.

The County has determined that a regional study for current air quality conditions is not required in order to evaluate the potential impacts associated with the Proposed Project.

Please see Topical Response #9, Environmental Justice, for a discussion of the relative size of the Proposed Project.

## Response to Comment No. 65-4

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for a detailed discussion of potential air quality and health impacts. Please also see Topical Response #1, Air Quality, and Topical Response #21, Public Health.

Please see Topical Response #15, Land Use, for a discussion of the County's Methane Mitigation Standards.

## Response to Comment No. 65-5

Please see Topical Response #7 for a discussion of Cumulative Impacts.

## Response to Comment No. 65-6

Original Draft EIR Chapter 3, General Setting and Resource Area Analysis, describes the surrounding future major residential projects in the vicinity of CCL in a discussion of cumulative impacts, and each of the resource area discussions in Chapters 4 through 15 address potential impacts to these cumulative projects. Additional discussion has also been added to Chapter 4, Land Use, of the Final EIR, to direct the reader to the sections of the EIR that address those potential impacts.

Please see Topical Response #15, Land Use, for a discussion of the County's Methane Mitigation Standards and cumulative impacts.

### Response to Comment No. 65-7

Please see Topical Response #7 for a discussion of Cumulative Impacts.

Please refer to Topical Response #15 for a discussion of Land Use, including a discussion of cumulative impacts related to this resource area.

### Response to Comment No. 65-8

Please see Topical Response #7, Cumulative Impacts, and Topical Response #15, Land Use.

### Response to Comment No. 65-9

Original Draft EIR Chapter 3, General Setting and Resource Area Analysis, describes the surrounding future major residential projects in the vicinity of CCL in a discussion of cumulative impacts, and each of the resource area discussions in Chapters 4 through 15 address potential impacts to these cumulative projects. Additional discussion has also been added to Chapter 4, Land Use, of the Final EIR, to direct the reader to the sections of the EIR that address those potential impacts.

Please see Topical Response #15, Land Use, for a discussion of the County's Methane Mitigation Standards.

### Response to Comment No. 65-10

Please see Topical Response #6 for a discussion of Cultural Resources and protection of Bowers Cave.

This comment is not related to an environmental issue associated with the Chiquita Canyon Landfill Master Plan Revision. The documents relating to this transaction are not associated with the environmental analysis in this EIR.

The County is aware that this comment contains many inaccuracies, including the fact that the property in question is not and was not owned by a Cambodian family. The County Department of Regional Planning processed the lot line adjustment that transferred the property in question from the actual owner to CCL. The adjacent community was notified by the County about the lot line adjustment through the required notification process.

### Response to Comment No. 65-11

Please see Topical Response #9, Environmental Justice.

### Response to Comment No. 65-12

Please see Topical Response #9, Environmental Justice.

### Response to Comment No. 65-13

Please see Topical Response #9, Environmental Justice.

### Response to Comment No. 65-14

Please see Topical Response #9, Environmental Justice.

### Response to Comment No. 65-15

Please see Topical Response #9, Environmental Justice, and Topical Response #21, Public Health.

### Response to Comment No. 65-16

Please see Topical Response #9, Environmental Justice.

### Response to Comment No. 65-17

Please see Topical Response #9, Environmental Justice.

### Response to Comment No. 65-18

Please see Topical Response #9, Environmental Justice.

### Response to Comment No. 65-19

Please see Topical Response #9, Environmental Justice, and Topical Response #22, Public Scoping and Public Outreach.

### Response to Comment No. 65-20

Please see Topical Response #9, Environmental Justice, and Topical Response #22, Public Scoping and Public Outreach.



October 23, 2014

Iris K. Chi, AICP  
Planner, Zoning Permits North  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012  
213.974.6443  
[ichi@planning.lacounty.gov](mailto:ichi@planning.lacounty.gov)

Dear Ms Chi,

I am writing to comment on the Draft Environmental Impact Report (DEIR) for the Chiquita Canyon Landfill Expansion project Case No. [Project No. R2004-00559-(5)].

Relatively new to the Val Verde area, my husband Jeremiah and I have regularly investigated this DEIR, the CUP, numerous documents and articles, and the 1997 agreement between the Chiquita Canyon Landfill (CCL), Val Verde, and Newhall Fand and Farming Co. We have also attended several meetings of the Val Verde Civic Association (VVCA), the Castaic Area Town Council (CATC) including the land use committee meetings and agenda planning meetings, the Val Verde Community Advisory Committee (VVCAC), a Board of Supervisors Board Meeting, and even toured the landfill. Lastly, we have connected with numerous neighbors who are not only upset that an expansion is even on the table but are suffering on a daily basis from the odors and gases emanating from the landfill **at its current size**.

Through this educational process, many aspects surrounding the project including the Landfill operators, their public representation, the local councils... with the exception of the VVCA, local media, and even the board of supervisors seemed to have one thing in common. The health, needs, and rights of the residents (including school children) and employees most impacted by this proposed expansion are either overlooked for financial gain or flat out ignored.

As a Los Angeles County resident, I feel it is necessary to illustrate to you the impacts not being addressed in this DEIR...the impacts which already exist which this proposed expansion will magnify greatly. The first and most important impact is a violation of a legal agreement of closure which this proposal is ignoring. I hope to continue to send more information as it forms but for the comment deadline I want to describe what I believe are the most alarming impacts first.

66-1

**AGREEMENT BETWEEN VVCA, LAIDLAW WASTE SYSTEMS (CHIQUITA CANYON LANDFILL), AND NEWHALL LAND AND FARMING CO.**

My husband and I were told the landfill will be closing in 2019 as were many of my neighbors. After further investigation we found this to be true in an agreement drafted when the landfill last expanded. In 1997, when the Chiquita Canyon Landfill last proposed an expansion, there was an agreement created between the Val Verde Civic Association, the Landfill ( then operated by Laidlaw waste systems) and the owners of the property, Newhall Land and Farming Co. Within this agreement, is a declaration of closure:

**CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)**

**PROPOSED MODIFICATIONS TO CUP 89 081-(5)  
CONDITIONS OF APPROVAL AND MONITORING PROGRAM**

9g.	Add	Nothing in this condition shall permit the maximum landfill capacity of 23 million tons to be increased.
-----	-----	--

New Condition #46		
Add	The maximum total capacity of the landfill shall be 23 million tons. Landfill closure shall occur when this capacity is reached or by November 24, 2019, whichever occurs first.	

66-2

Within this DEIR the landfill is proposed to continue operation beyond 2019 violating the legal agreement between the parties in 1997.

2.0 PROJECT DESCRIPTION

**2.2.3 Disposal Rate and Volume**

Los Angeles area. Assuming the maximum disposal rates under the Proposed Project were to begin in 2023, the landfill would reach capacity in approximately 2037 and would commence the closure process at that time.

The County may argue this agreement is unrelated to the DEIR in question but there are reasons to include this document as a factor in this proposal. Within the current Conditional Use Permit the landfill is operating under these same closure terms as well, this agreement is incorporated into the CUP as an addendum. One could argue that this proposed expansion creates grounds for legal action against the landfill and if passed, against the County as well.

**CHIQUITA CANYON LANDFILL OPERATES IN BAD FAITH**

This violation illustrates how the Chiquita Canyon Landfill is operating in bad faith. When confronted by this in public meetings they simply respond that it isn't in the CUP and therefore is no conflict with applying for another permit. This would be false because this permit exceeds the limits of both the CUP and the 97' agreement.

66-2  
cont'd

**Sludge violation**

Likewise, when the landfill has been confronted with another violation of the 97' agreement by accepting sludge from Santa Barbara again the CCL's response is non-apologetic.

Page 3, Condition #9 is modified as follows:

9a. Add The Landfill shall not accept sludge or sludge components at any time.

In fact they began their response at the September CATC Land Use Committee Meeting by denying it as sludge based on their wording although correspondences termed it as sludge.

VEN#	VENDOR NAME/ADDRESS	ORDER DATE			
046651	CHIQUITA CANYON LANDFILL 29201 HENRY MAYO DRIVE CASTAIC, CA 91384	CITY OF SANTA BARBARA CATER WATER TREATMENT PLANT 1150 SAN ROQUE RD. SANTA BARBARA, CA 93105 DELIVERY :			
REQ#	DEPARTMENT	TERMS			
464121741	CATER WATER TREATMENT	NET 30			
F.O.B. INFORMATION					
DESTINATION	0220 GC	CONFIRMING			
ITEM	DESCRIPTION	QTY	UNIT	UNIT PRICE	EXTENDED AMT
1	SLUDGE DISPOSAL	1	EA	165000.00	165000.00

66-3

411-4642-52750-000000-000 165,000.00

WATER TREATMENT SLUDGE DISPOSAL @ \$45.00 PER TON.

PRICING IN ACCORDANCE WITH QUOTE DATED 7/7/11 WHICH IS INCORPORATED HEREIN AND MADE A PART HEREOF BY THIS REFERENCE.

AUTHORITY TO PURCHASE THE SERVICES AND/OR MATERIALS DESCRIBED IN THIS PURCHASE ORDER IS PROVIDED FOR IN CITY COUNCIL ACTION DATED 7/12/11, ITEM NO. 10

FURNISH ALL LABOR, MATERIALS, EQUIPMENT, SUPERVISION AND APPURTENANCES NECESSARY FOR SLUDGE DISPOSAL.

Most disturbing about the sludge incident is the fact that the only reason it came to light was a Val Verde resident caught them accepting it. Otherwise, this violation may have never been acted upon. This exemplifies the questionable business ethics of Chiquita Canyon Landfill and Waste Connections. Even more alarming, it exemplifies its discrimination of the agreement made to protect the individuals near its

facility. **With that, it is an easy assumption to be made that this company will continue to operate without further consideration of its impact on the individuals working, living, attending school, and patronizing businesses in close proximity to its facility.**

66-3  
cont'd

**Denial and Non-facilitation of Health Risk Assessments**

When I toured the landfill I asked about the possible connections to the health symptoms numerous residents living on the south side of Val Verde are experiencing which are known side-effects of exposure to landfill gases. Many of the testimonies of the July 31st public hearing in Castaic which are on public record were residents describing their health issues; respiratory irritation including waking up choking for air, asthma, sleeplessness, eye irritation, fatigue, and nausea.

66-4

The response I received from Steve Cassulo was there is no way the landfill could be the cause of these ailments and they would not take any measures to perform health risk assessments unless the community were to pay for it. I was personally shocked at the instant denial of any connection considering it seems such a likely possibility. This would also severely contradict the "Good Neighbor" label they have attached to their business. To flat out deny any entertainment of the mere idea that these residents are not affected by landfill gases is abrasive and irresponsible if not naive.

**CATC Mitigation Agreement denies residents' rights to partake in CEQA process and violates the First Amendment Right to freedom of Speech**

Chiquita Canyon Landfill has sent mitigation agreements to both the VVCA and the CATC to establish new systems for mitigation funding. Within both the landfill has included text which if approved would not only make them in violation with CEQA and Freedom of Speech but would make the council parties in violation as well.

66-5

19. Pending the County's release of the Final EIR, the CATC and its officers and directors shall support all permitting and approval applications for the Project before local, state and federal agencies. Support of the Project includes letters, appearances, testimony, telephone calls and meetings with local, state and federal permitting and consulting agencies with respect to Project entitlements.

In Item 20 the landfill expands the range of individuals who are demanded to not just comply with the proposal but to support the project. If an individual speaks against the project the CATC in this case will lose mitigation funding.

20. In the event that the CATC, any officer, director, employee or agent of CATC, including any family members or co-habitants or any person or entity whose residence or business is located in the Castaic Area initiates any appeal of any Project approval, or joins in or supports in any way any appeal of Project approvals, including without limitation an appeal to the Los Angeles County Board of Supervisors, or filing any administrative or judicial challenge to the Project or the EIR or any Project approvals including those required by the California Environmental Quality Act ("CEQA"), this Agreement shall be voidable and of no further force and effect in CCL's sole discretion.

66-5  
cont'd

The level of discrimination written into this agreement, which was approved by the CATC (the VVCA is still negotiating) in a rushed and clearly objectified manner by the public as well as 4 town council members, is inexcusable. It is also a prominent reflection of the illegal tactics the CCL is capable of exercising. This again is a clear indication of CCL's corrupt operating procedures and direct evasion of protecting the individuals it is impacting now and with this proposal.

**LACK OF INFORMATION DISTRIBUTION AND TRANSLATION**

Literature pertinent to the proposal including the environmental report as well as notices of public hearings and meetings are only being made available in English and much of the surrounding community is not being notified of the proposal at hand.

According to the 2012 U.S. Census American Community Survey of 58.44% of Val Verde residents are Spanish speaking at home. The proposed expansion will also greatly affect the population to the east of the landfill where the natural barrier is at its lowest. Many of these residents and employees are not aware of the landfill proposal even though it is slated to become the largest landfill in California.

66-6

The current documents neglects our non-english speaking neighbors as well as a population which will be greatly impacted by this expansion. Citizens for Chiquita Canyon Landfill Compliance believe it is imperative that the community is fully informed and given adequate time to comment on this detrimental threat to our community.

**LACK OF MITIGATION MEASURES AND DESCRIPTION OF PROPER PROTECTION PRACTICES**

Throughout the Draft Environmental Impact Report, various mitigation measures are eluded to but quite often are not described in detail. Including the fugitive dust mitigation during construction, traffic regulation illustrated using methodologies which are extremely skewed for their use, health risk assessments excluded, and no new procedures of health risk monitoring practices are proposed to be implemented outside of the landfill. As well throughout the report there is a common lack of

66-7

These exclusions in addition to the poor track record of Waste Connections and Chiquita Canyon Landfill's relation to public request and acknowledgement and responsibility of environmental impact is a prime example of oppressive actions towards Los Angeles County residents. Approval of this report would reflect poorly on the County as well.

**For these reasons, I strongly urge the Board of Supervisors to NOT accept the DEIR as the Final EIR to begin the process over with all documents translated in Spanish and distributed to residents in Hasley Hills and Live Oak Areas including public postings at local schools, churches and business regarding this process. The County should also require further environmental analysis of the project by Chiquita Canyon Landfill and investigation of the Chiquita Canyon Landfill and Waste Connections, Inc for practicing irresponsibly and violating multiple citizen agreements and violating California and Federal laws.**

66-8

Sincerely,

Erica Larsen

Val Verde Resident since 2013

for further communication please send correspondences to [erica@eekart.com](mailto:erica@eekart.com)

Please see attached documents for further description:

1. 1997 Agreement between CCL, VVCA, and Newhall Land and Farming Co.
2. Santa Barbara Sludge Distribution Invoice
3. CATC Mitigation Memorandum of Agreement

<p><b>SECTION 11.0</b></p> <p><b>Air Quality</b></p>	
<p><b>11.2 Methodology</b></p> <p>“ Fugitive dust from vehicle travel on unpaved roads would be controlled through watering two times daily, the use of dust palliatives, paving as much as possible, and limiting the maximum vehicle speed to 15 miles per hour, which would result in a combined effective control efficiency of 90 percent (SCAQMD, 2013c; WRAP, 2006b).”</p> <p>Fugitive dust from soil disturbance would be suppressed with hourly watering and dust suppressant application, which would reduce particulate matter emissions by 90 percent (WRAP, 2006c).</p>	<p>Specific details regarding the following proposed measures shall be listed in order to assure members of the public that a well-planned, defined and effective fugitive dust-monitoring program has the strength to minimize potential air quality issues during construction:</p> <ul style="list-style-type: none"> <li>● Number of employees in dust-monitoring program who will control fugitive dust.</li> <li>● Any employees whose work duties are exclusive to the proposed fugitive dust-monitoring program.</li> <li>● Details of proposed fugitive dust-monitoring employee shifts: schedule of daily employee(s); locations where fugitive dust monitors will be working in the landfill and surrounding areas near the landfill; how employees will be equipped to access hard-to-reach areas of construction, if needed; how many employees will be monitoring at any given time; general hours of the fugitive dust-monitoring program; protocol measures of off-hour operational procedures under high-wind conditions.</li> <li>● Ensure that all agencies who regulate fugitive dust will be notified immediately if fugitive dust conditions are found to be present.</li> <li>● Ensure that complaints from every member of the public who contact agencies or the landfill regarding fugitive dust have been notified of measures to address their concerns as soon as possible.</li> <li>● Enforcement details of the proposed fugitive dust monitoring program: reporting criteria to all applicable Local, County, State, and Federal agencies who will regulate fugitive dust for proposed construction; itemized list of specific actions to be taken by CCL if fugitive dust is verified; equipment that will be used to determine MPH of construction vehicles; instrumentation and methods of verifying fugitive dust conditions.</li> <li>● A list of all applicable Local, County, State and Federal agency regulations regarding fugitive dust monitoring requirements who will oversee this proposed Project.</li> <li>● To preserve the details of the proposed fugitive dust-monitoring program, ensure that the</li> </ul>

66-9

	<p>requested above information, and any other program details are included in the Conditional Use Permit if this EIR is approved.</p> <p>Watering measures have been highly restricted by the County during the drought. Water spray every hour has been deemed excessive and objected by the County department of regional planning.</p> <p>Without watering every hour, Permittee must disclose:</p> <ul style="list-style-type: none"> <li>● Updated estimated levels of fugitive dust without hourly watering</li> <li>● Detailed descriptions of measures performed to reduce fugitive dusts at the required decreased watering level.</li> <li>● Alternatives to the construction process allowing for fugitive dust levels to sustain a safe level</li> <li>● Methods of tracking and recording fugitive dust levels</li> <li>● Mitigation measures enacted for fugitive dust impediment on air quality</li> </ul> <p>Permittee is to disclose the content of said “dust Palliatives” their makeup and substance. Including:</p> <ul style="list-style-type: none"> <li>● chemical makeup of dust palliatives</li> <li>● health risks associated with Palliatives/chemicals</li> <li>● levels or percentages of possible contaminants existing in dust pallatives</li> <li>● Any variations existing with current, future, and extreme lows and highs. Including any risks or negative impacts of raised levels of palliatives</li> </ul>	66-9 cont'd
<p><b>11.3 Regional Setting 11.3.1 Geography and Topography</b></p> <p>Figure 11-1 shows the various land use/land classifications surrounding the landfill. As shown in the figure, low intensity to high intensity developed land is located immediately northwest, northeast, and east of the landfill, indicating residential and commercial use areas.</p>	<p>The map in Figure 11-1 from 2006, does not reflect the current intensity of residential and commercial use areas.</p> <p>Permittee is to disclose illustrations of current intensity of residential and commercial use areas used as a basis of mitigation.</p> <p>Permittee must also disclose areas to be developed as part of the Newhall Landmark Project. The</p>	66-10
<p><b>11.3.3 Existing Air Quality</b></p>		
<p><b>11.3.3.1 Attainment Status</b></p> <p>SCAQMD operates a network of ambient air quality monitoring stations located throughout the Basin to</p>	<p>Common Landfill Gases include Methane, Ammonia, and Sulfides which are not being monitored here.</p>	66-11

<p>characterize the air quality environment. Pollutants monitored include ozone, CO, nitrogen dioxide (NO<sub>2</sub>), particulate matter with aerodynamic diameter less than or equal to 10 microns (PM<sub>10</sub>), particulate matter with aerodynamic diameter less than or equal to 2.5 microns (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), and lead. Depending on whether or not the air quality standards are met or exceeded, an area is classified as being in “attainment” or “nonattainment” for each pollutant. “</p>	<p>Permittee needs to disclose data collected for these chemicals, specifically METHANE, AMMONIA, VINYL CHLORIDE, HYDROGEN SULFIDE AND VISIBILITY-REDUCING PARTICLES.</p> <p>Permittee must also disclose:</p> <ul style="list-style-type: none"> <li>● the means of collecting these chemical levels,</li> <li>● the data compared to agency levels from CARB, EPA, and SCAQMD, including any other regulatory agencies required by Local, state, and federal law.</li> <li>● All mitigation procedures and executions if levels of chemicals violate CARB, EPA, and SCAQMD standards including any other regulatory agencies required by Local, state, and federal law.</li> <li>● Multiple sources for said contaminants must be disclosed and referred to as to determine source issues and possibilities for health standards to be met</li> </ul> <p>Permittee must re-classify the attainment or nonattainment classifications based on readings for above chemicals or the majority at minimum. If SCAQMD does not monitor these chemicals it is pivotal to the proper assessments to collect this data via Tedlar bagging or gas sampling bags.</p>
<p><b>11.3.3.2 Air Monitoring Data</b></p>	
<p>Ambient air quality data were taken from data published by CARB (on the Aerometric Data Analysis and Management [ADAM] website) and EPA (on the AirData website). Ambient concentrations of ozone, NO<sub>2</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are recorded at monitoring stations located throughout the South Coast Air Basin, in which CCL is located. Three of the nearest monitoring stations were used to gather information regarding the air quality around Chiquita Canyon: Burbank – W Palm Avenue, Reseda, and Santa Clarita stations. The Santa Clarita station is the closest to the project site, approximately 7 miles from the landfill entrance. SO<sub>2</sub> and PM<sub>2.5</sub> monitoring data are not available at the Santa Clarita station, therefore, the Burbank and Reseda stations were used for SO<sub>2</sub> and PM<sub>2.5</sub> data, respectively. A summary of the maximum monitored criteria pollutant concentrations is presented in Table 11-2. Monitoring data were taken from the Santa Clarita Monitoring Station monitor, with the exception of SO<sub>2</sub> data, which were taken</p>	<p>The data from the monitors presented in this report are obsolete to the air quality of the directly affected areas surrounding the landfill and the proposed expansion. Newhall monitor station, the nearest station used in this report, exists at a distance of 7 miles from the landfill. Burbank and Reseda stations land more than 17 miles from the landfill. The readings from these monitors do not sufficiently reflect the quality of air surrounding the landfill’s current and proposed borders.</p> <p>For the purpose of this report and its illustration of impacts on the environment, it is contradictory to not include data within the nearest residential and commercial centers ranging in proximity of 500 feet to 3 miles of the landfill current and proposed borders.</p>

66-11  
cont'd

66-12

<p>from the Burbank station, and PM<sub>2.5</sub> data, which were taken from the Reseda station. <b>Hydrogen sulfide, vinyl chloride, and visibility-reducing particles are not monitored.</b></p>	<p>Permittee must disclose air quality in nearest residential and business areas to properly calibrate the impact on air quality this proposal may create.</p> <p>All Stations are not monitoring HYDROGEN SULFIDE, VINYL CHLORIDE AND VRP (visibility-reducing particles)</p>	<p>66-12 cont'd</p>
<p>Table 11-2 shows the SO<sub>2</sub> levels reported at the Santa Clarita monitoring station during the period beginning in 2009 and ending in 2011. No exceedances occurred between 2009 and 2011 at the Santa Clarita station.</p> <p>Table 11-2 shows the PM<sub>10</sub> levels reported at the Santa Clarita monitoring station during the period beginning in 2009 and ending in 2011, as well as the number of days in which the state and federal standards were exceeded. Annual and 24-hour state standards were exceeded in 2009. The federal 24-hour standard was not exceeded between 2009 and 2011.</p> <p>“SO<sub>2</sub> and PM<sub>2.5</sub> monitoring data are not available at the Santa Clarita station, respecti “</p>	<p>As stated earlier in the report, the Santa Clarita monitoring station does not produce data for PM<sub>10</sub> levels or SO<sub>2</sub> levels. This statement contradicts earlier claims by the reporting party. Any reports based on this data shall be repudiated.</p>	<p>66-13</p>
<p><b>11.4.1.3 Conformity</b></p> <p>Under the 1990 CAA amendments, EPA has issued two types of SIP conformity guidelines—transportation conformity rules that apply to transportation plans and projects, and general conformity rules that apply to all other federal actions. Under transportation conformity, the United States Department of Transportation cannot fund, authorize, or approve federal actions to support programs or projects that do not conform to the CAA requirements for a project located in a nonattainment or maintenance area. Under general conformity, EPA requires all federal agencies to ensure that all federal actions must conform to an approved or promulgated state or federal implementation plan if the actions result in criteria pollutant emissions for which the area has been designated as a nonattainment or maintenance area. Though the area is not in attainment of the NAAQS for ozone and PM<sub>2.5</sub>, no federal action is needed for the Proposed Project. Therefore, a general conformity analysis for the Proposed Project is not required.</p>	<p>Based on methods of capturing air quality data in this report do not properly reflect impact of air quality within the 3 mile radius a determination of non-attainment or attainment must be re-evaluated. If the permittee were to operate in good faith, a general conformity analysis should be performed.</p>	<p>66-14</p>

<p><b>11.4.3 Local Regulations and Standards</b></p>	
<p><b>11.4.3.2 SCAQMD Regulations</b>  <b>New Source Review Rules (Regulation XIII)</b>                  Regulation XIII combines the federal and state NSR requirements into a single rule. Regulation XIII establishes pre-construction requirements for new or modified facilities to ensure that operation of such facilities does not interfere with progress towards the attainment of ambient air quality standards without unnecessarily restricting economic growth.</p>	<p>Regulation XIII is not being complied to based on the Landmark Village Newhall Development Project and could be seen as a detrimental action towards the operations of the Valencia Commerce Center. Multiple operations in the Valencia Commerce Center will have a conflict with their operations existing to a closer proximity to the proposed eastern border.</p> <p>Multiple businesses produce organic products and would not be able to operate with the landfill expansion.</p>
<p><b>11.4.2 State Regulations and Standards</b>                  CARB oversees California air quality policies. CAAQS were first established in 1969 pursuant to the Mulford- Carrell Act. These standards are generally more stringent than the NAAQS and include four additional pollutants: sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particulates. Relevant CAAQS are listed in Table 11-4</p>	<p>As documented in the July 31st public hearing at Castaic Sports Complex, several Val Verde residents testified to having ailments similar to those associated with Hydrogen Sulfide, Vinyl Chloride and Methane.</p> <p>Residents also testified they smell landfill odors on a regular basis.</p> <p><b>To cross reference:</b></p> <p><b>Hydrogen Sulfide Health Effects:</b></p> <p><a href="https://www.health.ny.gov/environmental/chemicals/hydrogen_sulfide/">https://www.health.ny.gov/environmental/chemicals/hydrogen_sulfide/</a></p> <p>Foul odors and health effects were investigated in an Indiana community near a waste disposal lagoon and in five New York State communities near landfills containing construction and demolition debris. Hydrogen sulfide levels in the Indiana community ranged up to 300 ppb during a two-month period. Levels in two of the New York communities ranged up to 4000 ppb for periods of several months. During these episodes there were frequent health complaints including eye, throat and lung irritation, nausea, headache, nasal blockage, sleeping difficulties, weight loss, chest pain, and asthma attacks. Although other chemicals may have been present in the air, these effects are consistent with those of hydrogen sulfide.</p> <p>The main effects of short-term and long-term hydrogen sulfide exposure in laboratory animals are nasal and lung irritation and damage and effects on the brain. These effects are consistent with effects seen in people exposed to hydrogen sulfide.</p>

66-15

66-16

	<p><b>Occupational Safety &amp; Health Administration</b></p> <p>***<a href="https://www.osha.gov/SLTC/hydrogensulfide/hazards.html">https://www.osha.gov/SLTC/hydrogensulfide/hazards.html</a></p> <p>Hydrogen sulfide gas causes a wide range of health effects. Workers are primarily exposed to hydrogen sulfide by breathing it. The effects depend on how much hydrogen sulfide you breathe and for how long. Exposure to very high concentrations can quickly lead to death.</p> <p><b>Short-term (also called acute) symptoms and effects</b> are shown below:</p>	66-16 cont'd
<p><b>11.5.1.1 Landfill Gas Surface Emissions</b>                  The gas wells and pipelines collect an average of 85 percent of the LFG produced, and about 15 percent of the gas generated in the landfill escapes as fugitive emissions.</p>	<p>Permittee must disclose how this data is determined.</p> <p>What methods are used to determine the percentage of fugitive emissions not being captured?</p> <ul style="list-style-type: none"> <li>● Disclose any equipment used to determine emission captures</li> <li>● Disclose any employee involvement in recording fugitive emissions</li> <li>● Disclose the agency permittee will report data to</li> <li>● Disclose timeline of practices of capturing fugitive gas levels</li> </ul> <p>Permittee must disclose penalties associated with violations of these percentages.</p> <ul style="list-style-type: none"> <li>● Agencies responsible for administering these violations</li> <li>● Disclose descriptions of the violations for not capturing standard percentages of fugitive emissions.</li> </ul>	66-17
<p><b>11.6 Potential Impacts</b>  <b>11.6.1 Standards of Significance 11.6.1.1</b>  <b>Criteria under CEQA Context</b></p> <p>Pursuant to the California Environmental Quality Act (CEQA) Guidelines, air quality impacts related to the Proposed Project would be significant if the project would:</p> <ul style="list-style-type: none"> <li>● Conflict with or obstruct implementation of the applicable air quality plan;</li> <li>● Violate any air quality standard or contribute substantially to an existing or projected air quality violation;</li> <li>● Expose sensitive receptors to substantial pollutant concentrations;</li> <li>● Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable</li> </ul>	<p>Re: <i>Expose sensitive receptors to substantial pollutant concentrations</i></p> <p>Within the County-approved Newhall Land Development, residential and commercial properties Landmark Village Elementary is highly likely to be exposed to substantial pollutant concentrations as well as</p> <p>CAL.PRC.CODE sec. 21151.4 (1-2)                  An environmental impact report shall not</p> <p>21151.4. (a) An environmental impact report shall not be certified                  or a negative declaration shall not be approved for any project involving the construction or alteration of a facility within                  one-fourth of a mile of a school that might reasonably be anticipated</p>	66-18

<p>federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors); or</p> <ul style="list-style-type: none"> <li>● Create objectionable odors affecting a substantial number of people.</li> </ul>	<p>to emit hazardous air emissions, or that would handle an extremely hazardous substance or a mixture containing extremely hazardous substances in a quantity equal to or greater than the state threshold quantity specified pursuant to subdivision (j) of Section 25532 of the Health and Safety Code, that may pose a health or safety hazard to persons who would attend or would be employed at the school, unless both of the following occur:</p> <p>(1) The lead agency preparing the environmental impact report or negative declaration has consulted with the school district having jurisdiction regarding the potential impact of the project on the school.</p> <p>(2) The school district has been given written notification of the project not less than 30 days prior to the proposed certification of the environmental impact report or approval of the negative declaration.</p> <p>(b) As used in this section, the following definitions apply</p> <p>(1) "Extremely hazardous substance" means an extremely hazardous substance as defined pursuant to paragraph (2) of subdivision (g) of Section 25532 of the Health and Safety Code.</p> <p>(2) "Hazardous air emissions" means emissions into the ambient air of air contaminants that have been identified as a toxic air contaminant by the State Air Resources Board or by the air pollution control officer for the jurisdiction in which the project is located. As determined by the air pollution control officer, hazardous air emissions also means emissions into the ambient air of a substance</p> <p><a href="http://codes.lp.findlaw.com/cacode/PRC/1/d13/4/s2115">http://codes.lp.findlaw.com/cacode/PRC/1/d13/4/s2115</a>  <u>1.4</u></p>
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66-18  
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<p><b>11.6.3 Proposed Project</b></p> <p>This section presents the potential construction and operation impacts resulting from implementation of the Proposed Project.</p> <p><b>11.6.3.1 Construction Impacts</b></p> <p>This section presents an evaluation of the potential impact resulting from construction of the Proposed Project.</p> <p>Impact AQ-1: Implementation of the Proposed Project would generate construction impacts that would not exceed the criteria pollutant significance thresholds used by SCAQMD to determine significance of construction emissions. Construction-related impacts would be less than significant.</p>	<p>Construction Impact information is inaccurate as it is based on 2 hour watering of roadways to contain fugitive dust levels.</p> <p>New measures must be illustrated without the use of excessive amounts of water which as it is now may be in compliance with SCAQMD, it counters the California Drought Measures.</p> <p>Permittee to disclose updated data based on fugitive dust levels without watering on a 2 hour schedule.</p> <p>Permittee to disclose if the new measures continue to meet the SCAQMD standards and any other acting agencies regulating air quality standards at the Local, County, and Federal level.</p>
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66-19

# Attachments

CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES PROJECT 89-081

*Handwritten initials: MJ, Huer, Row, JPS*

STATEMENT OF AGREEMENTS AND UNDERSTANDINGS BY AND BETWEEN

NEWHALL LAND AND FARMING CO  
LAIDLAW WASTE SYSTEMS (CHIQUITA), INC.  
VAL VERDE CIVIC ASSOCIATION

1. Laidlaw agrees to add the name of a contact person, phone number, physical and electronic addresses, and the contact person's supervisor to each entity identified in the February 1997 document entitled:  

"Regulatory Process for the Permitting of the Landfill expansion and Material Recovery Facilities and a Description of the General Regulatory Oversight Environment During Normal Operations"
2. All parties agree to review and approve the attached list of approved possible expenditures of the annual Community Benefit Fund (Attachment A). The parties agree Val Verde Civic Association shall accept and spend the funds within its existing 501C3 designation amended to include a representative from Laidlaw, Newhall Land and Farming Co., and the County of Los Angeles Fifth District Supervisor's Office.
3. Laidlaw agrees to participate in good faith, on a regular basis, with the Community Advisory Committee and to assist wherever possible in furthering communication between the community of Val Verde and the landfill, including information sharing, education, understanding of landfill operations, and response to calls. Laidlaw further agrees to forward all notices and reports from or to its regulatory agencies to the Community Advisory Committee within five business days of receipt of transmittal.
4. Val Verde Civic Association agrees to attend the Board of Supervisors hearing on February 25, 1997, and give oral and written testimony that their concerns have been satisfied.
5. Val Verde Civic Association agrees to oppose any action by any party to deny CUP 89-081- (5) during the appeals process and subsequent regulatory approval process. The parties agree the Val Verde Civic Association is solely responsible for defining how its opposition takes place. Val Verde Civic Association further agrees to support the continuation of operations of existing CUP 1809-5 should this become necessary because the permittee is precluded from operating under proposed CUP 89-081 as a result of a lawsuit.
6. The parties agree community benefit funds shall be dispersed according to the attached Payment Schedule (Attachment B).

*Handwritten initials: MJ, Huer, Row, JPS*

7. All conditions of CUP 89-081 (5) shall remain as approved by the Regional Planning Commission except as noted in Attachment C, Proposed Modification for Board of Supervisors' Anticipated Action 2/25/97.
8. Val Verde Civic Association agrees no funds received at any time as a result of approval of CUP 89-081 shall be used in any manner against the good name or activities of The Newhall Land and Farming Co. and its subsidiaries, the landfill operator, and/or landowner, in any way.
9. Val Verde Civic Association agrees to accept the Memorandum of Understanding between Laidlaw and the United Water Conservation District as mitigation of water issues, Laidlaw agrees to provide the Community Advisory Committee with any and all reports, data, and information provided to the District from the landfill and/or provided by the District to the landfill. *within 5 working days.*
10. Laidlaw and Newhall Land and Farming Co. agree to legally bind all successors in interest in all conditions of approval of CUP 89-081 (5) and all agreements between the parties. Val Verde Civic Association agrees to execute the legal documents needed to accomplish this and any other documents needed for the fulfillment of these agreements and understandings.
11. If any term or provision of this Statement of Agreements and Understandings ("Agreement") is determined to be invalid or unenforceable, the remaining terms and provisions shall not be affected thereby and shall remain in full force and effect to the maximum extent permitted by law.
12. If any party to this Agreement is a corporation, trust, general or limited partnership, or community organization, each individual executing this Agreement on behalf of such entity represents and warrants that he or she is duly authorized to execute and deliver this Agreement on behalf of said entity.

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*Rust*  
*Green*  
*my*

Dated: February 21, 1997

LAILAW WASTE SYSTEMS (CHIQUITA), INC.

By: *Rodney W. Walter II*  
 Printed Name: RODNEY W. WALTER II  
 Title: GENERAL MANAGER

Dated: February 21, 1997

NEWHALL LAND AND FARMING CO.

By: *Gary M. Lusimano*  
 Printed Name: GARY M. LUSIMANO  
 Title: President

*[Handwritten initials]*

Dated: February 24 1997

VAL VERDE CIVIC ASSOCIATION

By: *Ruth P. Griffin*  
Printed Name: RUTH P. GRIFFIN  
Title: PRESIDENT

Dated: February 24, 1997

CITIZENS AGAINST CHIQUITA

By: *Merry Farmer*  
Printed Name: MERRY FARMER  
Title: CHAIRPERSON

*Ruth  
Griffin*

ATTACHMENT A

VAL VERDE  
COMMUNITY BENEFITS FUNDS

LIST OF PERMITTED EXPENDITURES

A. General Community Welfare

1. Increase opportunities for the children, <sup>adults and seniors</sup> and youth of the community

- Examples:
- a. Bi-lingual education
  - b. Headstart type programs
  - c. Computer training
  - d. Literacy skills enhancement
  - e. Increased library services
  - f. Equipment for above

2. Increase access to health services

- Examples:
- a. Increased availability of Sam Dixon clinic services
  - b. Indigent care programs
  - c. Teen pregnancy programs
  - d. Transportation to medical services

3. Promote programs and activities for youth and "at risk" youth

- Examples:
- a. Youth sports, such as Midnight Basketball
  - b. Youth education
  - c. Job skills training
  - d. Participation in Sheriff's "at risk" programs

B. Capital Investment Programs

1. Aesthetic improvements

- Examples:
- a. Rehabilitation of existing publicly owned or non-profit organization owned buildings
  - b. Construction of new community buildings such as library, senior center
  - c. Maintenance of buildings
  - d. **LANDSCAPING**

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*Ruw*

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C. Administration

1. Costs associated with gathering community input on level of expenditures and furthering understanding in the community of the Community Benefit Fund

- Examples: a. Advertising and convening public meetings or forums  
b. Translation services  
c. Recordation of input

2. Costs associated with accountability of funds received and funds spent

- Examples: a. Audits  
b. Production of annual financial statement  
c. Tax filings

3. Leveraging of funds

- Examples: a. Matching grant programs  
b. Public/private partnerships

4. Technical consultant assistance to address items A, B and C above

- Examples: a. Completion of administrative functions above  
b. Contract compliance for community welfare programs

The parties agree any expansion or addition of items to this list requires written approval of the Newhall Land and Farming Co., the landfill operator, the landfill owner, and the Val Verde Civic Association.

Dated: February 21, 1997

LAWLAW WASTE SYSTEMS (CHIQUITA), INC.

By: Rodney W. Walter II  
Printed Name: RODNEY W. WALTER II  
Title: GENERAL MANAGER

Dated: February 21, 1997

NEWHALL LAND AND FARMING CO..

By: Gary M. Casimiro  
Printed Name: GARY M. CASIMIRO  
Title: President

Dated: February 24, 1997

VAL VERDE CIVIC ASSOCIATION.

By: Ruth P. Griffin  
Printed Name: RUTH P. GRIFFIN  
Title: President

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Dated: February 22, 1997

CITIZENS AGAINST CHIQUITA

By: Merry Farmer  
Printed Name: J MERRY FARMER  
Title: CHAIRPERSON

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ATTACHMENT B

**VAL VERDE COMMUNITY BENEFITS FUND  
PAYMENT SCHEDULE**

CALENDAR YEAR	250,000 TONS OR MORE		LESS THAN 250,000 TONS	
	OWNER	OPERATOR	OWNER	OPERATOR
Year 1	\$125,000	\$125,000	\$12,500	\$12,500
Year 2	127,500	127,500	12,750	12,750
Year 3	130,050	130,050	13,005	13,005
Year 4	132,651	132,651	13,265	13,265
Year 5	135,304	135,304	13,530	13,530
Year 6	138,010	138,010	13,801	13,801
Year 7	140,770	140,770	14,077	14,077
Year 8	143,586	143,586	14,359	14,359
Year 9	146,457	146,457	14,646	14,646
Year 10	149,387	149,387	14,939	14,939
Year 11	152,374	152,374	15,237	15,237
Year 12	155,422	155,422	15,542	15,542
Year 13	158,530	158,530	15,853	15,853
Year 14	161,701	161,701	16,170	16,170
Year 15	164,935	164,935	16,493	16,493
Year 16	168,234	168,234	16,823	16,823
Year 17	171,598	171,598	17,160	17,160
Year 18	175,030	175,030	17,503	17,503
Year 19	178,531	178,531	17,853	17,853
Year 20	182,101	182,101	18,210	18,210
Year 21	185,743	185,743	18,574	18,574
Year 22	189,458	189,458	18,946	18,946

Notes: 1. Actual payment to be determined according to the actual tonnage landfilled during the previous calendar year.

2. The Year 1 payment may be pro-rated so as to have all remaining payments paid on the calendar year.

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Handwritten signatures and initials, including 'ppp', 'my', 'Row', and 'Hend'.

ATTACHMENT C

CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)

PROPOSED MODIFICATIONS TO CUP 89 081-(5)  
CONDITIONS OF APPROVAL AND MONITORING PROGRAM

REGIONAL PLANNING COMMISSION ACTION 9/11/96  
BOARD OF SUPERVISORS ANTICIPATED ACTION 2/25/97

Pgs. 1 & 2, Conditions of Project Approval Condition for Use Permit 89-081-(5), #5 is modified as follows:

- 5. Delete November 24, 2012
- Add November 24, 2019

Page 3, Condition #9 is modified as follows:

- 9a. Add The Landfill shall not accept sludge or sludge components at any time.
- 9b. Add The existing viewshed from Chiquito Canyon Road as presented pictorially to the Board of Supervisors on 2/25/97 shall be protected for the life of the project. The dip in the natural ridgeline along the western boundary shall be maintained or enhanced. Any structure placed on the landfill site, including but not limited to temporary storage areas, any materials recovery facility, composting facility or any other ancillary facilities that may be visible from Chiquito Canyon Road shall be designed to be harmonious with the natural topography and viewshed and shall be reviewed by the Community Advisory Committee.  
  
Add The landfill operator and the Community Advisory Committee shall work together to prepare a tree planting and maintenance plan for the entire western boundary of the site. The objectives of the plan are to screen landfill operations, enhance the viewshed, establish the minimum number and type of trees necessary to do this and to provide adequate access to monitoring wells. Trees may be planted on slopes on either side of the ridgeline provided the above objectives are met and such planting is practical.
- 9d. Delete 35,000 tons per week and 7 working days
- Add 30,000 tons per week and 6 working days

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*[Handwritten signatures]*

**CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)**

**PROPOSED MODIFICATIONS TO CUP 89 081-(5)  
CONDITIONS OF APPROVAL AND MONITORING PROGRAM**

- 9g. Add Nothing in this condition shall permit the maximum landfill capacity of 23 million tons to be increased.
- 9h. Delete sentence as written.
- Add "The landfill shall not accept refuse for disposal from 5:00 p.m. on Saturdays through 4:00 a.m. on Mondays. Maintenance activities may occur during these times.

Page 6, Condition #12 is modified as follows:

- 12a. Second line, the word "biosolids" is deleted.

Page 7, Condition #12 is modified as follows:

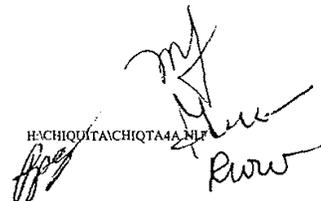
12d is deleted and replaced by:

- 12d. The composting operation shall receive no more than 560 tons per day of green waste and no waste water biosolids (e.g., sludge or sludge components).

Page 9, Condition #20 is modified as follows:

20e is deleted and replaced by:

- 20e. The landfill operator shall install and maintain temporary litter fences in operating areas and in those areas along the property perimeter that are regularly littered due to the location of the operating area, time of year, and climatic conditions. The landfill operator and the Community Advisory Committee shall work together to identify littered areas in need of fencing.
- Add 20g. The landfill operator shall install speed bumps on landfill property in paved areas along the route of trucks leaving the landfill. The purpose of the speed bumps is to knock out dirt and debris accumulated in wheel wells before trucks leave the site.

  
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CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)

PROPOSED MODIFICATIONS TO CUP 89 081-(5)  
CONDITIONS OF APPROVAL AND MONITORING PROGRAM

Add 20h. Landfill personnel shall police Chiquito Canyon Road from SR 126 to the entrance to Val Verde at Rancho Avilos and the surrounding area within 100 feet of the centerline of the road or to any existing fence on private property for the purpose of locating and cleaning up litter in this area. Litter pickup shall be a minimum of one time per month and may be increased, upon agreement between the landfill operator and the Community Advisory Committee, to maintain a litter free environment.

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Add 20i. The landfill operator shall provide four free quarterly clean-up days to residents of Val Verde, showing proper identification and proof of residence at the landfill entrance. These days may be Sundays. The operator shall further reimburse the Community Advisory Committee for the cost of providing two rolloff bins in Val Verde on each clean-up day. The operator and Committee may jointly change this program if they mutually determine alternatives to the above can further assist the community.

Page 11, Condition #23 is modified to:

Add The permittee shall have bilingual (Spanish/English) employees available during business hours. The permittee shall arrange to have Spanish speaking operators available for messages 24 hours per day.

Page 13, Condition #34 is modified to:

Add The permittee shall use his best efforts to maximize landfill gas collection consistent with applicable government regulations. The permittee shall use the best available technology when installing and maintaining landfill gas collection systems.

Add Permittee shall purchase a maximum of five combustible gas monitors, at least one of which is able to be used outdoors, an organic vapor analyzer, similar to the monitors used in structures at the Chiquita Canyon Landfill, and provide same to the Community Advisory Committee for placement in locations of concern to the community, as determined by the Committee. These monitors are designed to detect and provide warning in the event of a build-up of methane gas. The Committee shall be responsible for locating, monitoring and maintaining such monitors. In the event such monitors indicate discernible levels of methane gas, the Committee and the landfill operator shall jointly investigate the situation and if it is determined that the

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CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)

PROPOSED MODIFICATIONS TO CUP 89 081-(5)  
CONDITIONS OF APPROVAL AND MONITORING PROGRAM

landfill is the cause of such methane gas build-up, the landfill operator will take corrective action.

Add The permittee shall work with the Citizens Advisory Committee in understanding the requirements of Rule 1150.1 governing the control of gaseous emissions from active landfills. The permittee shall forward copies of any notices or reports filed with or received from the regulatory agency or agencies responsible for oversight.

Page 15, Condition #42

Add The permittee shall perform an economic viability and marketing study on an annual basis to assess opportunities to implement a materials recovery facility in an expeditious manner. *NOTHING IN THIS CONDITION SHALL MANDATE THE PERMITEE TO IMPLEMENT A MATERIALS RECOVERY FACILITY.*

Page 15, New Condition #43:

Add The permittee shall present its Emergency Response Plan to the Community Advisory Committee and develop an additional component with the Committee for emergency notification to the Val Verde community. The landfill operator shall bear the reasonable costs, if any, of plan implementation.

New Condition #44

Add The permittee and the land owner shall establish an ongoing Val Verde Community Benefits Fund for the life of the project as follows:

The minimum funding provided during any annual period when the landfill has accepted less than 250,000 tons of waste for disposal in the previous calendar year shall be \$12,500 from the owner and \$12,500 from the operator. If the landfill is accepting waste for disposal during any annual period and accepted 250,000 tons of waste for disposal or more in the previous calendar year, the funding to be paid for that annual period will be \$125,000 from the owner and \$125,000 from the operator. The funding amount shall be adjusted 2% per year.

*AS DIRECTED BY THE COUNTY THIS CONDITION #44 MAY BE MORE APPROPRIATE IN THE STATEMENT OF AGREEMENTS AS ITEM # 13*

**CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)**

**PROPOSED MODIFICATIONS TO CUP 89 081-(5)**

**CONDITIONS OF APPROVAL AND MONITORING PROGRAM**

The commencement date for provision of funds shall be the later of (1) January 1, 1998 or (2) the date upon which all of the County approvals and the subsequent approvals are complete and effective and no appeals, litigation or other challenges to such approvals are pending or permitted pursuant to applicable statutes of limitation.

The payment for the first year may be pro-rated so as to have all subsequent payments made on a calendar year basis.

New Condition #45:

Add The permittee shall purchase translation equipment as specified by the Val Verde Civic Association for a one time cost not to exceed \$8,000, by or before the first payment is made in Condition #44.

New Condition #46

Add The maximum total capacity of the landfill shall be 23 million tons. Landfill closure shall occur when this capacity is reached or by November 24, 2019, whichever occurs first.

New Condition #47

Add In the event that permittee is precluded from utilizing this grant as a result of a lawsuit, permittee may continue to operate the existing landfill under CUP 1809-(5) beyond the November 24, 1997 expiration date applicable to, and subject to all other conditions and limitations set forth in CUP 1809-(5) until completion of the design shown on the latest approved Exhibit A on file with CUP 1809-(5) or November 24, 2000, or until lawsuit resolution granting this CUP 89 081-(5), which ever occurs first.

  
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ATTACHMENT B

**VAL VERDE COMMUNITY BENEFITS FUND  
PAYMENT SCHEDULE**

<u>CALENDAR YEAR</u>	<u>250,000 TONS OR MORE</u>		<u>LESS THAN 250,000 TONS</u>	
	<u>OWNER</u>	<u>OPERATOR</u>	<u>OWNER</u>	<u>OPERATOR</u>
Year 1	\$125,000	\$125,000	\$12,500	\$12,500
Year 2	127,500	127,500	12,750	12,750
Year 3	130,050	130,050	13,005	13,005
Year 4	132,651	132,651	13,265	13,265
Year 5	135,304	135,304	13,530	13,530
Year 6	138,010	138,010	13,801	13,801
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Year 9	146,457	146,457	14,646	14,646
Year 10	149,387	149,387	14,939	14,939
Year 11	152,374	152,374	15,237	15,237
Year 12	155,422	155,422	15,542	15,542
Year 13	158,530	158,530	15,853	15,853
Year 14	161,701	161,701	16,170	16,170
Year 15	164,935	164,935	16,493	16,493
Year 16	168,234	168,234	16,823	16,823
Year 17	171,598	171,598	17,160	17,160
Year 18	175,030	175,030	17,503	17,503
Year 19	178,531	178,531	17,853	17,853
Year 20	182,101	182,101	18,210	18,210
Year 21	185,743	185,743	18,574	18,574
Year 22	189,458	189,458	18,946	18,946

Notes: 1. Actual payment to be determined according to the actual tonnage landfilled during the previous calendar year.

2. The Year 1 payment may be pro-rated so as to have all remaining payments paid on the calendar year.

H:\CHIQUITA\ATTACHB.VV

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*How*

CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES, PROJECT #89-081  
(STATE CLEARINGHOUSE NO. 92071053)

PROPOSED MODIFICATIONS TO CUP 89 081-(5)  
CONDITIONS OF APPROVAL AND MONITORING PROGRAM

MONITORING PROGRAM MODIFICATIONS

Page 2, Attachment to Conditions, Monitoring Program, Part I Landfill Elevations, A, third line, shall be modified to read as follows:

“... the permittee shall install *permanent* survey monuments ...”

Pages 7 and 8, Attachment to Conditions, Part VII, Monitoring Reports, shall be modified as follows:

Add The Community Advisory Committee shall receive a copy of the completed report and agency comments upon submittal to the Regional Planning Commission. *All reports in this section will be forwarded to the Community Advisory Comm.*  
The permittee and its technical staff shall be available to present the findings and implications of the report at no cost, in a timely manner, to the Community Advisory Committee upon request. *within 5 weeks of report.*

*Handwritten notes:*  
in this section will be forwarded to the Community Advisory Comm.  
PPV  
PPV

*Handwritten notes:*  
within 5 weeks of report.  
PPV  
PPV

Page 9 - Attachment to Conditions, Part VIII, Community Advisory Committee, shall be modified as follows:

Add “The committee shall be comprised of a majority of persons who reside in Val Verde.

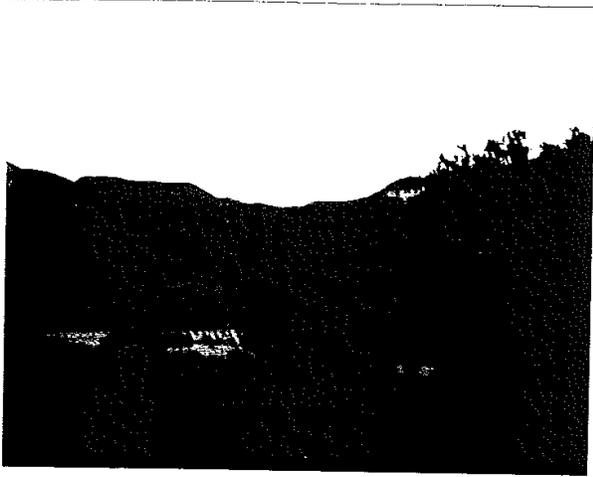
Delete “persons who reside in the vicinity of the site.”

Page 9, Part VIII, #3

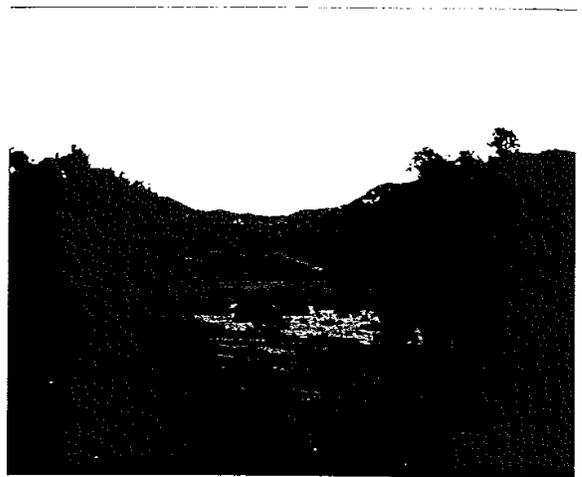
Delete \$11,000 per annum

Add \$20,000 per annum

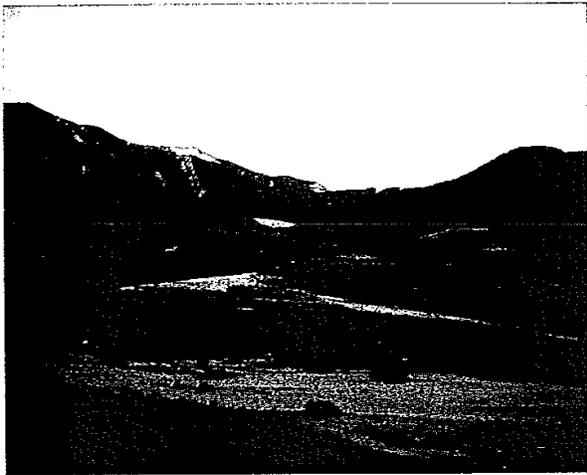
*Handwritten signatures:*  
PPV  
PPV  
HACHIQUITA CHIQITAMA, NLE  
Rure



2-14-97



2-14-97

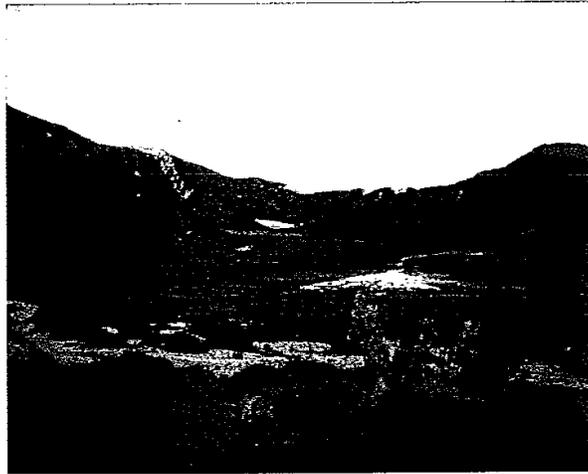


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M. J. P.  
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CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES PROJECT 89-081

FIRST AMENDMENT TO  
STATEMENT OF AGREEMENTS AND UNDERSTANDINGS BY AND BETWEEN

NEWHALL LAND AND FARMING CO  
LAIDLAW WASTE SYSTEMS (CHIQUITA), INC.  
VAL VERDE CIVIC ASSOCIATION  
CITIZENS AGAINST THE CHIQUITA CANYON LANDFILL EXPANSION

The parties hereto hereby amend the "Statement of Agreements and Understandings" entered into between them on February 21 and 24, 1997 (the "Agreement") as follows:

1. Paragraph 2 of the Agreement is hereby deleted and replaced with the following new Paragraph 2:

"2. Expenditures of funds received pursuant to this Agreement shall be limited to the list of permitted expenditures set forth in Attachment A to the Agreement, as may be amended from time to time according to its terms. The Val Verde Civic Association shall accept and expend the funds received pursuant to this Agreement through an independent committee of the Val Verde Civic Association (the "Community Benefits Funding Committee"), which the Val Verde Civic Association shall create on or before September 30, 1997 by amending its Bylaws as needed. The Community Benefits Funding Committee shall consist of: (a) five voting members all of whom shall be elected in an open, inclusive election process in accordance with the election provisions set forth in Attachment D hereto; and (b) four non-voting members, one each as designated by Laidlaw Waste Systems (Chiquita), Inc., the Newhall Land and Farming Co., the Los Angeles County Supervisor for the district that includes the landfill, and the Val Verde Civic Association."

2. "New Condition #44" as set forth in Attachment C to the Agreement is hereby deleted and replaced with the following "New Condition #44":

"New Condition #44: Permittee shall comply with the Statement of Agreements and Understandings it entered into with certain community representatives on February 21 and 24, 1997, as that agreement has been amended and as it may be amended according to its terms."

3. New Paragraphs 13, 14, and 15 are hereby added to the main body of the Agreement, as follows:

“13. The community benefits funds shall be paid to the Community Benefits Funding Committee established pursuant to paragraph 2 above. The funding provided during any annual period when the landfill is accepting waste for disposal and accepted less than 250,000 tons of waste for disposal in the previous calendar year shall be \$12,500 from the owner and \$12,500 from the operator. If the landfill is accepting waste for disposal during any annual period and accepted 250,000 tons of waste for disposal or more in the previous calendar year, the funding to be paid for that annual period will be \$125,000 from the owner and \$125,000 from the operator. The funding amount otherwise due shall be adjusted up 2% per year as shown on Attachment B. The commencement date triggering the owner’s and operator’s obligation to pay such funds shall be the later of (1) January 1, 1998 or (2) the date upon which all of the County approvals and the subsequent approvals necessary for the initial operation of the landfill expansion are complete and effective and no appeals, litigation or other challenges to such approvals are pending or permitted pursuant to applicable statutes of limitation (the “Commencement Date”). The landfill operator shall use its best efforts to complete the permitting process at the earliest practicable time.”

“14. Payments hereunder shall be made in advance based on the previous year’s tonnage of waste disposed of at the landfill. The first payment shall be due within 30 days after the Commencement Date. Thereafter, each payment shall be due by January 31 of each year for which a payment is due. By making payments in advance it is understood that no payment shall be made for any year in which the landfill does not accept waste for disposal even if the landfill has accepted waste for disposal in the preceding year. For the final year in which the landfill accepts waste for disposal, the payment due by January 31 of that year shall be pro-rated as a portion of an entire year’s payment based on the landfill operator’s estimate of the number of months in that year that the landfill will actually accept waste for disposal. If the landfill operator’s estimate is ultimately shorter than the actual number of months in that year in which the landfill accepts waste for disposal, then an additional pro-rated payment shall be made within 30 days of the date on which the landfill stops accepting waste for disposal.”

"15. The parties hereby agree that any amendments to this Agreement made after the Commencement Date may only be made in writing and signed by representatives of Laidlaw Waste Systems (Chiquita), Inc. (or its successors or assigns), The Newhall Land and Farming Co. (or its successors or assigns), and the Val Verde Civic Association (or its successors). No other party's consent shall be required to amend this Agreement after the Commencement Date, and the Citizens Against the Chiquita Canyon Landfill Expansion hereby waives its right to participate in matters pertaining to the Agreement after the Commencement Date. There are no third party beneficiaries to the Agreement. In the event that the Val Verde Civic Association ceases to exist, or if the Community Benefits Funding Committee becomes legally incapable of existing as an independently-elected committee of the Val Verde Civic Association in accordance with this Agreement, then the Community Benefits Funding Committee shall establish itself as an independent corporation organized in compliance with this Agreement and all applicable laws and regulations, and all rights of the Val Verde Civic Association and the Community Benefits Funding Committee under this Agreement (including the right to agree to amend this Agreement) shall transfer automatically to that new corporation. The Val Verde Civic Association shall not be deemed to have ceased existence solely due to a change or changes in its name and/or its constituent documents. In the event of such a change, the Association shall give notice thereof to the parties to this Agreement."

IT IS SO AGREED.

Dated: April 23, 1997

LIDLAW WASTE SYSTEMS (CHIQUITA), INC.

By: Rodney W. Walter II  
Printed Name: RODNEY W. WALTER II  
Title: GENERAL MANAGER

Dated: April 23 1997

NEWHALL LAND AND FARMING CO. WD

By: Gary M. Cusumano  
Printed Name: GARY M. CUSUMANO  
Title: President

Dated: April   , 1997

VAL VERDE CIVIC ASSOCIATION

By: Ruth F. Gribbin  
Printed Name: Ruth F. Gribbin, 4/23/97  
Title: President Val Verde Civic Assoc.

Dated: April 23, 1997

CITIZENS AGAINST THE CHIQUITA CANYON  
LANDFILL EXPANSION

By: Merry L. Farmer  
Printed Name: MERRY L. FARMER  
Title: Chairperson

ATTACHMENT D

ELECTION REQUIREMENTS FOR THE  
COMMUNITY BENEFITS FUNDING COMMITTEE

Section 1. The First Election of Voting Members

- a. The Executive Committee of the Val Verde Civic Association (the "Association") shall coordinate and call the first election for the five Voting Members of the Community Benefits Funding Committee (the "Committee") in strict compliance with the requirements of this Attachment D.
- b. The first election must occur by September 30, 1997, and the Voting Members elected at that election shall take their positions immediately.
- c. At the first election, all five Voting Members will be elected. The three highest vote getters will be designated as holding the "odd year" positions with those positions becoming open for new elections in 1999 and in every odd-numbered year thereafter. The other two Voting Members will be designated as holding the "even year" positions with those positions becoming open for new elections in 1998 and in every even-numbered year thereafter.
- d. The election procedural duties given by this Attachment D to the Committee's Voting Members (as set forth in Section 3 below) shall be exercised, for the first election only, by the Executive Committee of the Association with assistance from the Non-Voting Member designated by the Los Angeles County Supervisor for the district that includes the Chiquita Canyon Landfill.

Section 2. Subsequent Elections of Voting Members

After the first election of the Voting Members, the Committee shall coordinate and call all future elections of its Voting Members, which elections must occur during the months of October or November each year. All subsequently elected Voting Members shall take their positions effective as of December 1 following their election.

Section 3. Conduct of Elections

The five Voting Members will be elected by an open, inclusive, annual, privately-run election process, as set forth below.

- a. A notice of election providing the date, time, purpose, and location of the election must be published not less than three weeks nor more than eight weeks before the date of the election in two community newspapers selected by the Voting Members and serving the Val Verde community, one of which

must be an English-language newspaper and one of which must be a Spanish-language newspaper. For the first election, notice must be published in The Signal and La Opinion.

- b. A bilingual (English and Spanish) notice of the election must be posted in a prominent location in the community of Val Verde at least three weeks before the election and must remain posted continuously until the election. In the event of any vandalism defacing or removing the posted election notice, notice shall be replaced or repaired as soon as reasonably possible and the act of vandalism shall not prevent the election from occurring as scheduled.
- c. The election shall take place within the community of Val Verde if reasonably practicable or, if no venue within Val Verde is reasonably available, as close to Val Verde as is practicable.
- d. The election shall be held from 7:00 a.m. to 7:00 p.m., and shall be held on a Tuesday, Wednesday, or Thursday, but not on any legal holiday.
- e. All persons registered to vote in the community of Val Verde, County of Los Angeles, whose primary residence is in the community of Val Verde and who attend the election in person shall be eligible to vote for the Voting Member positions being elected at that election.
- f. Any person registered to vote in the community of Val Verde, County of Los Angeles, and whose primary residence is in the community of Val Verde shall be eligible to be nominated as a candidate for any Voting Member position. If any person serves two consecutive terms as a Voting Member, then such person shall not be eligible to serve as a Voting Member for at least one year.
- g. Candidates wishing to run for the Voting Member openings shall obtain an application from the Committee in advance of the election. Bilingual notice of the availability of the applications shall be posted on the community bulletin board at Val Verde Park at least two months in advance of the election. The completed applications must be returned to the Committee at least 30 days prior to the election. The application must include the signatures of five qualified voters, in addition to the candidate, supporting the candidate's nomination.
- h. Election shall be by secret ballot and each eligible resident shall be entitled to cast one vote for each position open, and the highest eligible vote-getters shall be elected.

- i. In the event of an exact tie, the then-current Voting Members, including the outgoing Voting Members, shall break the tie by selecting one of the tied voters to fill the position.

Section 4. Definition of Community of Val Verde

For purposes of this Attachment D, the "community of Val Verde" shall mean that portion of Los Angeles County, State of California, described as follows:

From the Val Verde, California, U.S.G.S. 7.5 minute series topographic map (photorevised 1988):

The northeast quarter of Section 8, all of Section 9, and the west half of Section 10, all of Township 4 North, Range 17 West, S.B.M.

EXCEPTING THEREFROM the southwest quarter of said Section 9 and the north half of the northwest quarter of Section 10.

Notwithstanding the foregoing description, the following addresses shall be deemed to be within the community of Val Verde:

- a. 29050 Elk Street;
- b. 29053 Coolidge Avenue;
- c. 31513 San Martinez Road; and
- d. 31510 San Martinez Road.

CHIQUITA CANYON LANDFILL EXPANSION  
AND RELATED FACILITIES PROJECT 89-081

SECOND AMENDMENT TO  
STATEMENT OF AGREEMENTS AND UNDERSTANDINGS BY AND BETWEEN

NEWHALL LAND AND FARMING CO  
LAIDLAW WASTE SYSTEMS (CHIQUITA), INC.  
VAL VERDE CIVIC ASSOCIATION

The parties hereto amend the "Statement of Agreements and Understandings" entered into between them on February 21 and 24, 1997, as modified by the First Amendment thereto dated April 23, 1997 (together the "Agreement") as follows:

1. Attachment D to the Agreement is hereby replaced in its entirety with the revised Attachment D attached hereto. All other terms of the Agreement remain unchanged.

IT IS SO AGREED.

Dated: May 16, 1997

LAIDLAW WASTE SYSTEMS (CHIQUITA), INC.

By: Rodney W. Walter II  
Printed Name: RODNEY W. WALTER II  
Title: GENERAL MANAGER

Dated: May 16, 1997

NEWHALL LAND AND FARMING CO.

By: D. N. Regant  
Printed Name: Daniel N. Regant  
Title: Asst. Sec

Dated: May 16, 1997

VAL VERDE CIVIC ASSOCIATION

By: Ruth P. Griffin  
Printed Name: Ruth P. Griffin  
Title: President

Dated: May 16, 1997

CITIZENS AGAINST THE CHIQUITA CANYON  
LANDFILL EXPANSION

By: Merry Farmer  
Printed Name: MERRY FARMER  
Title: Chairperson

MS

ATTACHMENT D

ELECTION REQUIREMENTS FOR THE  
COMMUNITY BENEFITS FUNDING COMMITTEE

- Section 1. The First Election of Voting Members
- a. The Executive Committee of the Val Verde Civic Association (the "Association") shall coordinate and call the first election for the five Voting Members of the Community Benefits Funding Committee (the "Committee") in strict compliance with the requirements of this Attachment D.
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  - d. The election procedural duties given by this Attachment D to the Committee's Voting Members (as set forth in Section 3 below) shall be exercised, for the first election only, by the Executive Committee of the Association with assistance from the Non-Voting Member designated by the Los Angeles County Supervisor for the district that includes the Chiquita Canyon Landfill.

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Section 3. Conduct of Elections

The five Voting Members will be elected by an open, inclusive, annual, privately-run election process, as set forth below.

- a. A notice of election providing the date, time, purpose, and location of the election must be published not less than three weeks nor more than eight weeks before the date of the election in two community newspapers selected by the Voting Members and serving the Val Verde community, one of which

Handwritten signature and initials in the bottom right corner of the page. The signature appears to be "R. M. [unclear]" and the initials below it are "R. M."

must be an English-language newspaper and one of which must be a Spanish-language newspaper. For the first election, notice must be published in The Signal and La Opinion.

- b. A bilingual (English and Spanish) notice of the election must be posted in a prominent location in the community of Val Verde at least three weeks before the election and must remain posted continuously until the election. In the event of any vandalism defacing or removing the posted election notice, notice shall be replaced or repaired as soon as reasonably possible and the act of vandalism shall not prevent the election from occurring as scheduled.
- c. The election shall take place within the community of Val Verde if reasonably practicable or, if no venue within Val Verde is reasonably available, as close to Val Verde as is practicable.
- d. The election shall be held from 7:00 a.m. to 7:00 p.m., and shall be held on a Tuesday, Wednesday, or Thursday, but not on any legal holiday.
- e. All persons at least 18 years old, who have a valid California driver's license or California-issued photo identification card showing primary residence in the community of Val Verde, who have a current utility bill, telephone bill, or other similarly trustworthy document substantiating current primary residence in Val Verde, and who attend the election in person shall be eligible to vote for the Voting Member positions being elected at that election.
- f. Any person eligible to vote for the Voting Member positions pursuant to the preceding paragraph shall be eligible to be nominated as a candidate for any Voting Member position. If any person serves two consecutive terms as a Voting Member, then such person shall not be eligible to serve as a Voting Member for at least one year.
- g. Candidates wishing to run for the Voting Member openings shall obtain an application from the Committee in advance of the election. Bilingual notice of the availability of the applications shall be posted on the community bulletin board at Val Verde Park at least two months in advance of the election. The completed applications must be returned to the Committee at least 30 days prior to the election. The application must include the signatures of five qualified voters, in addition to the candidate, supporting the candidate's nomination.
- h. Election shall be by secret ballot and each eligible resident shall be entitled to cast one vote for each position open, and the highest eligible vote-getters shall be elected.

Handwritten signature and initials, possibly "RWS" and "RWS" with a checkmark.

- i. In the event of an exact tie, the then-current Voting Members, including the outgoing Voting Members, shall break the tie by selecting one of the tied vote-getters to fill the position.

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EXCEPTING THEREFROM the southwest quarter of said Section 9 and the north half of the northwest quarter of Section 10.

Notwithstanding the foregoing description, the following addresses shall be deemed to be within the community of Val Verde:

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- b. 29053 Coolidge Avenue;
- c. 31513 San Martinez Road; and
- d. 31510 San Martinez Road.





**City of Santa Barbara**  
Public Works Department

[www.SantaBarbaraCA.gov](http://www.SantaBarbaraCA.gov)

May 16, 2012

Main Office

630 Garden Street  
P.O. Box 1990  
Santa Barbara, CA  
93102-1990

**SUBJECT: Public Document Request for Chiquita Canyon Landfill Purchase Orders**

Administration

Tel: 805.564.5377  
Fax: 805.897.2613

Engineering

Tel: 805.564.5363  
Fax: 805.564.5467

In response to your email request, dated May 16, 2012, to receive copies of Chiquita Canyon Landfill purchase orders originating from the Cater Water Treatment Plant, please see the attached copy of Purchase Order No. 386242, dated July 20, 2011, that the City of Santa Barbara has with Chiquita Canyon Landfill for disposal of water treatment sludge. This is the only Purchase Order that the City has with Chiquita Canyon Landfill for the Cater Water Treatment Plant.

Facilities

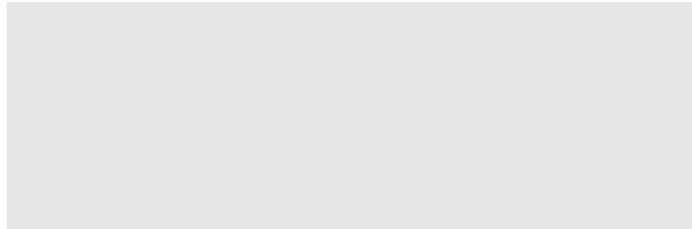
Tel: 805.564.5415  
Fax: 805.897.2577

The Cater Water Treatment Plant is a regional drinking water treatment plant. The drinking water treatment sludge produced at Cater consists primarily of inert solids that are used to remove Total-Organic-Carbon during the drinking water treatment process.

Street Maintenance

Tel: 805.564.5413  
Fax: 805.897.1991

By delivery of the document, I consider that I have satisfied my obligation to provide you with the requested documents. If you have any additional requests, I can be reached at



Transportation

Tel: 805.564.5385  
Fax: 805.564.5467

Water Resources

Tel: 805.564.5413  
Fax: 805.897.1991

Attachment

CT/ntc

cc: Sarah Knecht, Assistant City Attorney  
Rebecca Bjork, Water Resources Manager  
Andrew Rhodes, Water Treatment Superintendent  
Brett Wieser, Water Treatment Supervisor

REGULAR P.O. FACSIMILE  
 DATE PRINTED: 08/30/2011  
 PAGE 1

PO#	CONTRACT
386242	000000

VEN#	VENDOR NAME/ADDRESS	ORDER DATE			
046651	CHIQUITA CANYON LANDFILL 29201 HENRY MAYO DRIVE CASTAIC, CA 91384	CITY OF SANTA BARBARA 07/20/2011 CATER WATER TREATMENT PLANT 1150 SAN ROQUE RD. SANTA BARBARA, CA 93105 DELIVERY :			
REQ#	DEPARTMENT	TERMS			
464121741	CATER WATER TREATMENT	NET 30			
F.O.B. INFORMATION					
DESTINATION	0220 GC	CONFIRMING			
ITEM	DESCRIPTION	QTY	UNIT	UNIT PRICE	EXTENDED AMT
1	SLUDGE DISPOSAL	1	EA	165000.00	165000.00

411-4642-52750-000000-000 165,000.00

WATER TREATMENT SLUDGE DISPOSAL @ \$45.00 PER TON.

PRICING IN ACCORDANCE WITH QUOTE DATED 7/7/11 WHICH IS INCORPORATED HEREIN AND MADE A PART HEREOF BY THIS REFERENCE.

AUTHORITY TO PURCHASE THE SERVICES AND/OR MATERIALS DESCRIBED IN THIS PURCHASE ORDER IS PROVIDED FOR IN CITY COUNCIL ACTION DATED 7/12/11, ITEM NO. 10

FURNISH ALL LABOR, MATERIALS, EQUIPMENT, SUPERVISION AND APPURTENANCES NECESSARY FOR SLUDGE DISPOSAL.

PREVAILING WAGES:  
 THE PROVISIONS OF ARTICLES 2 AND 3, DIVISION 2, PART 7, CHAPTER 1 OF THE LABOR CODE, STATE OF CALIFORNIA, ARE MADE BY THIS REFERENCE A PART OF THIS PURCHASE ORDER.

ON ANY INDIVIDUAL JOB THAT EXCEEDS \$1,000.00, CONTRACTOR MUST PAY PREVAILING WAGE AS REQUIRED BY THE STATE LABOR CODE.

REGULAR P.O. FACSIMILE  
DATE PRINTED: 08/30/2011  
PAGE 2

PO#		CONTRACT		
386242		000000		
VEN#	VENDOR NAME/ADDRESS	ORDER DATE		
046651	CHIQUITA CANYON LANDFILL 29201 HENRY MAYO DRIVE CASTAIG, CA 91384	CITY OF SANTA BARBARA CATER WATER TREATMENT PLANT 1150 SAN ROQUE RD. SANTA BARBARA, CA 93105 DELIVERY :	07/20/2011	
REQ#	DEPARTMENT	TERMS		
464121741	CATER WATER TREATMENT	NET 30		
F.O.B. INFORMATION				
DESTINATION		0220 GC	CONFIRMING	
ITEM	DESCRIPTION	QTY	UNIT PRICE	EXTENDED AMT

PREVAILING WAGE AND CERTIFIED PAYROLL

[WWW.SANTABARBARACA.GOV/BUSINESS/  
PURCHASING/GENERAL\\_SERVICES/](http://WWW.SANTABARBARACA.GOV/BUSINESS/PURCHASING/GENERAL_SERVICES/)

CONTRACTOR'S LICENSE #: \_\_\_\_\_  
CONTRACTOR MUST CURRENTLY POSSESS A  
VALID CALIFORNIA CONTRACTOR'S LICENSE  
OF THE CLASSIFICATION APPROPRIATE FOR  
THIS WORK.

INSURANCE REQUIREMENTS: ATTACHED IS  
HEREBY MADE PART OF THIS ORDER.

AMERICANS WITH DISABILITIES ACT (ADA)  
REQUIREMENTS. IF THIS SOLICITATION  
CONTEMPLATES THE PROVISION OF SERVICES  
TO THE PUBLIC, VENDOR SHALL, IN ADDITION  
TO ANY OTHER REQUIREMENTS UNDER ADA,  
COMPLY WITH THE TITLE II REQUIREMENTS OF  
THE ADA REGARDING THE ACCESSIBILITY OF  
CITY SERVICES AND PROGRAMS, AS AN  
EXPLICIT REQUIREMENT. VENDOR ASSURES  
THAT, AT ALL TIMES DURING THE  
PERFORMANCE OF ANY RESULTING PURCHASE  
ORDER, NO QUALIFIED INDIVIDUAL WITH A  
DISABILITY SHALL, BY REASON OF THAT  
DISABILITY, BE EXCLUDED FROM  
PARTICIPATION IN, OR BE DENIED BENEFITS  
OF, SERVICES, PROGRAMS, OR ACTIVITIES  
PERFORMED BY VENDOR FOR THE BENEFIT OF

REGULAR P.O. FACSIMILE  
 DATE PRINTED: 08/30/2011  
 PAGE 3

VEN#	VENDOR NAME/ADDRESS	ORDER DATE			
046651	CHIQUITA CANYON LANDFILL 29201 HENRY MAYO DRIVE CASTAIC, CA 91384	CITY OF SANTA BARBARA 07/20/2011 CATER WATER TREATMENT PLANT 1150 SAN ROQUE RD. SANTA BARBARA, CA 93105 DELIVERY :			
REQ#	DEPARTMENT	TERMS			
464121741	CATER WATER TREATMENT	NET 30			
F.O.B. INFORMATION					
DESTINATION	0220 GC	CONFIRMING			
ITEM	DESCRIPTION	QTY	UNIT	UNIT PRICE	EXTENDED AMT
	THE CITY.				

SUB TOTAL	165,000.00
EXCISE TAX	EXEMPT
SALES TAX	.00
FREIGHT	.00
TOTAL	165,000.00

## Memorandum of Agreement

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Memorandum of Agreement ("Agreement") by and between Chiquita Canyon Landfill, LLC ("CCL") and the Castaic Area Town Council, a California a municipal advisory body ("CATC"), collectively referred to herein as "the Parties", with respect to the Chiquita Canyon Landfill Master Plan Revision Project ("Project").

### Recitals

*Whereas*, CCL has proposed the Project for the Chiquita Canyon Landfill solid waste management facility, located at 29201 Henry Mayo Drive (State Route 126) in unincorporated Los Angeles County; and

*Whereas*, the Project proposes to extend the permitted height of the landfill and laterally extend the foot print of the existing landfill and to increase the allowed daily and weekly maximum tonnage for Disposal from 6,000 tons per day and 30,000 tons per week to a maximum of 12,000 tons per day and 60,000 tons per week; and

*Whereas*, the County of Los Angeles Department of Regional Planning is overseeing the processing of land use entitlements and preparation of an environmental impact report ("EIR") for the Project, which was released for public comment in July 2014; and

*Whereas*, CCL desires to continue good neighbor relations with nearby communities and reach agreement with the Castaic community to resolve all potential disputes regarding the Project and to fund future community benefit programs for the benefit of Castaic community

*Now Therefore*, the Parties do hereby agree as set forth below.

## Agreement

The Parties, in consideration of the mutual obligations and conditions of each set forth in this Agreement, do hereby agree as follows:

1. The Recitals are a material term of this Agreement.
2. At any time after the execution of this Agreement, but no later than thirty days after CCL receives final approval from the Los Angeles County Department of Regional Planning or the Los Angeles County Board of Supervisors, as the case may be, CATC agrees that it shall form a charitable organization pursuant to the requirements of Internal Revenue Code (IRC) section 501(c)(3) ("Chiquita Canyon Castaic Community Benefits Fund" (CCCCBF), for the purpose of receiving charitable donations and funding from CCL, either directly or through a charitable organization or foundation, on an annual basis as described below, said funds to be to be distributed for community benefit and enhancement purposes on such terms as are established herein below.
3. The mission of the CCCCCBF shall be to support local Castaic community activities and benefit local projects and programs for the betterment of Castaic.
4. CCL agrees that subject to compliance with the terms set forth herein for use of funds received by Chiquita Canyon Castaic Community Benefits Fund, CCL will make an annual payment to the Chiquita Canyon Castaic Community Benefits Fund for the benefit of the Castaic Area (defined below) in an amount equal to 30% of a pool of available CCL funds generated by multiplying \$0.80/ton on Disposed solid waste in a calendar year ("the Funds"). The annual payment will be made by the 15<sup>th</sup> day of February following the year for which the annual tonnage has been used to

calculate the amount of the Funds to be donated by CCL to the Chiquita Canyon Castaic Community Benefits Fund.

5. As used in this Agreement, "Castaic Area" shall be generally defined as encompassing Region 1 of the CATC, generally north of Highway 126 and fully encompassing Regions 3, 4 and 5 of the CATC, and specifically excluding Region 2 (Val Verde).
6. The Parties agree that the Funds are only to be used for community purposes that benefit the Castaic Area as defined above in paragraph five (5). The Parties agree that subject to paragraphs 7 and 8 below, community purposes include grants and direct funding for community based organizations providing educational opportunities, social or aesthetic benefits or services to the Castaic Area; grants or direct funding of infrastructure improvements within the Castaic Area; grants or direct funding of structures or facilities for the benefit of the Castaic Area; and similar programs or purposes. The Funds shall not be used in any way to directly or indirectly compensate those serving on the board of directors for CCCCBF.
7. The Parties agree that the Funds cannot be used against CCL, the Project, the landfill, its successors, business partners, parent company, subcontractors, etc. in any way. The CCCCBF shall be free to utilize the Funds as general revenues, provided that the fees are no way utilized in any manner, directly or indirectly, adverse to the CCL, its parent company, affiliates or subsidiary companies as determined by CCL in its sole discretion.
8. The Parties agree that the Funds cannot be spent directly or indirectly for political campaigns, political action or campaign committees of any kind, independent expenditures or candidates.
9. Persons serving as voting members of the CCCCBF board of directors shall annually file a Form 700 as specified in the Political

Reform Act and Fair Political Practices Act (“FPPC”) laws and regulations.

10. The CCCCBF will conduct its meetings in public and in compliance with California’s open meeting rules as governed by The Brown Act.
11. The CCCCBF will be comprised of nine (9) members as follows:
  - a. Five (5) standing seats shall be appointed positions and shall, include four (4) by the Castaic Area Town Council and one (1) by the Castaic Chamber of Commerce. The five (5) standing seats will serve staggered 2-year terms and are limited to 4 consecutive terms.
  - b. The CCCCBF shall have two (2) ex-officio non-voting seats, one for Chiquita Canyon Landfill and one for the Fifth Supervisorial District.
  - c. The Five (5) standing seats and two (2) ex-officio seats will annually appoint the remaining two (2) at-large positions, through an open application process. The at-large positions are limited to 2 consecutive one-year terms.
  - d. None of the 9 seats can be filled by a Val Verde resident or an owner of property in Val Verde.
  - e. Specific details regarding terms and appointments of Directors and Officers shall be governed by the CCCCBF bylaws.
12. CATC and CCCCBF agree that at least 80% of the annual contribution from CCL must be spent in the Castaic Area community each year. The CCCCBF shall not invest more than 20% of its annual contribution into an investment account. No more than 12% of the Funds can be used annually for the administrative management (rent, salaries, CPA, bookkeeper, out of pocket costs) of the organization.
13. The CCCCBF must prepare an annual budget based on the prior year’s revenue from CCL and the CCCCBF must vote to approve

the budget. Following its approval of the budget, the CCCCBF will present its budget to the CATC for approval. The CCCCBF must conduct an annual independent audit of its finances by a qualified CPA that specializes in 501(c) (3) charitable organizations.

14. The CCCCBF shall at all times remain in good standing in accordance with the California Nonprofit Public Benefit Corporation Law, and exist solely for public and charitable purposes.
15. In order to be effective and binding, the Agreement shall be approved by the CATC by a majority vote.
16. The Agreement is contingent upon the Project obtaining all final approvals and will commence on January 1 of the first year following the final approval of the Project, subject to exhaustion of all litigation and appeals regarding Project permits and approvals through entry of final judgment.
17. The Agreement is contingent upon Los Angeles County, any successor entity or any of its departments or subdivisions not levying, imposing or assessing a fee on landfill operations to fund or help fund one or more community benefits or community projects. Fees on landfill operations may include a "Community Mitigation Fee", "Host Mitigation Fee", or any similar fee on the landfill, its revenues or its operations, including without limitation by ordinance, resolution or through land use permit conditions of approval or otherwise, regardless of which subdivision of the County imposes such fee obligation.
18. If the Terms and Conditions of this Agreement are violated by the CATC or CCCCBF at any time, CCL may, in its sole discretion, after providing written notice of the violation to CATC or CCCCBF as appropriate with an opportunity to cure the violation within a reasonable period of time as determined by CCL, cease making the annual payment to CCCCBF.

19. Pending the County's release of the Final EIR, the CATC and its officers and directors shall support all permitting and approval applications for the Project before local, state and federal agencies. Support of the Project includes letters, appearances, testimony, telephone calls and meetings with local, state and federal permitting and consulting agencies with respect to Project entitlements.
20. In the event that the CATC, any officer, director, employee or agent of CATC, including any family members or co-habitants or any person or entity whose residence or business is located in the Castaic Area initiates any appeal of any Project approval, or joins in or supports in any way any appeal of Project approvals, including without limitation an appeal to the Los Angeles County Board of Supervisors, or filing any administrative or judicial challenge to the Project or the EIR or any Project approvals including those required by the California Environmental Quality Act ("CEQA"), this Agreement shall be voidable and of no further force and effect in CCL's sole discretion.
21. This Agreement represents the entire understanding of the Parties hereto as to those matters contained herein. There are no other or further understandings between the Parties, whether written or oral, that are not set forth herein. No prior oral or written understandings shall be of any force or effect with respect to those matters covered hereunder. This Agreement may only be modified by amendment in writing signed by each Party.
22. In the event that any legal action or proceeding is necessary to enforce the terms and conditions of this Agreement, the prevailing party in any such action or proceeding shall be entitled to an award of reasonable attorneys' fees and costs, including expert fees.
23. In the event of a dispute between the Parties hereto, the Parties agree that prior to initiating litigation, the Parties shall first attempt

to resolve the dispute informally by means of at least one face to face meeting between representatives of the Parties who have authority to negotiate and reach agreements on disputed matters. In the event that informal resolution is not successful, the Parties further agree that they shall seek resolution of the dispute through non-binding arbitration, to be governed by the commercial arbitration rules of the AAA or JAMS or similar alternative dispute resolution providers, as determined by CCL. In the event the dispute cannot be resolved through arbitration, either Party may thereafter initiate litigation proceedings.

24. The Agreement cannot be assigned by either Party without prior written consent, which consent cannot be unreasonably withheld.
25. This Agreement shall be binding on the heirs, successors and assigns of the Parties hereto.
26. This Agreement shall be governed by California law.

Executed this \_\_\_\_\_ day of \_\_\_\_\_, 2014.

Castaic Area Town Council

By:

\_\_\_\_\_  
President

\_\_\_\_\_  
Vice President or Secretary

Executed this \_\_\_\_\_ day of \_\_\_\_\_, 2014.

Chiquita Canyon Landfill LLC

By: Michael Dean

\_\_\_\_\_  
Division Vice President

# Letter No. 66

Erica Larson

## Response to Comment No. 66-1

Please see Topical Response #19, Project Need, and Topical Response #21, Public Health.

## Response to Comment No. 66-2

Please see Topical Response #5 for a discussion of CCL's existing Conditional Use Permit and Community Agreement.

## Response to Comment No. 66-3

Please see Topical Response #4 for a discussion of Conditional Use Permit Compliance. Also see Topical Response #29a for a discussion of Wastes to be Disposed and Topical Response #29b for a discussion of the Waste Screening and Acceptance Program.

## Response to Comment No. 66-4

Please see the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, which includes an updated health risk assessment, as well as Topical Response #1, Air Quality, and Topical Response #21, Public Health.

## Response to Comment No. 66-5

Language in the agreements associated with the Proposed Project with the Val Verde Civic Association and the Castaic Area Town Council is similar to that included in the existing 1997 agreement with the Val Verde Civic Association.

Any agreements between CCL and the surrounding communities regarding community benefits funding or other topics will continue to be negotiated outside of the environmental review process for the Proposed Project.

## Response to Comment No. 66-6

The County is in compliance with the State's notification process. Please see Topical Response #22, Public Scoping and Public Outreach.

## Response to Comment No. 66-7

Please see the Mitigation Monitoring and Reporting Plan (MMRP) included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the South Coast Air Quality Management District (SCAQMD), who will oversee compliance with permit conditions and dust control plans.

## Response to Comment No. 66-8

Please see Topical Response #22, Public Scoping and Public Outreach. Please also see the additional analysis of the Proposed Project included in the Partially Recirculated Draft EIR.

## Response to Comment No. 66-9

BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the Mitigation Monitoring and Reporting Plan (MMRP) included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the SCAQMD, who will oversee compliance with permit conditions and dust control plans.

## Response to Comment No. 66-10

Please see the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, as well as Topical Response #1, Air Quality, and Topical Response #21, Public Health. Existing locations of sensitive receptors, such as schools, and locations of planned schools, residences, and businesses are included in the air quality and health risk analyses for the Proposed Project and Cumulative Impacts analyses for the Proposed Project. Please see Chapter 11 and Section 11.9 of the Partially Recirculated Draft EIR.

Meteorological data inputs for the Health Risk Assessment are provided in Appendix H, which incorporates observed meteorological data trends. Please also see Topical Responses #1c, #1d, and #1e, Air Quality, for additional information.

## Response to Comment No. 66-11

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects.

## Response to Comment No. 66-12

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects.

## Response to Comment No. 66-13

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects.

## Response to Comment No. 66-14

As shown in revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, conformity is not applicable to the Proposed Project because the General Conformity Rule only applies to federal actions, and there is no federal action associated with the Proposed Project.

## Response to Comment No. 66-15

Please see Topical Response #1b, Applicable Requirements and Regulatory Setting.

## Response to Comment No. 66-16

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, which describes the results of a health risk assessment of potential health effects of exposure to these chemicals and others in ambient air.

## Response to Comment No. 66-17

Please see Topical Response #1c, Emission Sources Associated with the Proposed Project and Methods Used to Calculate Emissions.

## Response to Comment No. 66-18

Please see the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, as well as Topical Response #1, Air Quality, and Topical Response #21, Public Health. Existing locations of sensitive

receptors, such as schools, and locations of planned schools, residences, and businesses are included in the air quality and health risk analyses for the Proposed Project and Cumulative Impacts analyses for the Proposed Project. Please see Chapter 11 and Section 11.9 of the Partially Recirculated Draft EIR.

Meteorological data inputs for the Health Risk Assessment are provided in Appendix H, which incorporates observed meteorological data trends. Please also see Topical Responses #1c, #1d, and #1e, Air Quality, for additional information.

### Response to Comment No. 66-19

Please see revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, for an updated discussion of dust control BMPs. BMPs associated with fugitive dust, described in Table 11-1 of the revised Chapter 11, Air Quality, of the Partially Recirculated Draft EIR, are also included in the MMRP included in the Final EIR. The Lead Agency, Los Angeles County Department of Regional Planning, is responsible for enforcement of compliance with the MMRP, along with the SCAQMD, who will oversee compliance with permit conditions and dust control plans.



Iris Chi

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**From:** C Kimura [jnk7777@gmail.com]  
**Sent:** Thursday, October 23, 2014 8:42 PM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon Landfill Draft Environmental Impact Report Comments

Cynthia Kimura  
29027 Elk Avenue  
Val Verde, CA 91384  
(562) 498-1106  
[jnk7777@gmail.com](mailto:jnk7777@gmail.com)

October 23, 2014

Ms. Iris Chi  
Los Angeles County Department of Regional Planning  
320 W. Temple St.  
Los Angeles, CA 90012

Re: Chiquita Canyon Landfill Draft Environmental Impact Report Comments

Dear Ms. Iris Chi:

I am writing to request my comments to the draft environmental impact report for Chiquita Canyon Landfill be addressed. The following are my concerns.

Section 20370 states, "Seismic Design: Class III Units shall be designed to withstand the maximum probable earthquake (MPE) without damage to the foundation or to the structures which control leachate, surface drainage, erosion, or gas."  
Please address the damage to the liner after the Northridge earthquake. The liner sustained tears which may have caused leaching into the ground and / or water. As you can see in: EVALUATION OF SOLID WASTE LANDFILL PERFORMANCE DURING THE NORTHRIDGE EARTHQUAKE by Anthony J. Augello, S.M. ASCE, Neven Matasovic, A.M. ASCE, Jonathan D. Bray, M. ASCE, Edward Kavazanjian, Jr., M. ASCE, and Raymond B. Seed, M. ASCE (<http://files.ecan.govt.nz/public/consents/wil-sub-evidence-ecess-hall-1.pdf>), the damage in Table 1 shows that the Chiquita Canyon Landfill had significant damage with two localized tear areas

67-1

in the geo-membrane side slope liners, one 4 m in length and the other about 27 m in length (page 4 of document). In the event of another such magnitude quake, please address potential damage to the liners and the leachate that may, in turn, leak into the ground and water. Also, please address the potential damage that occurred to the tears in the liners from the Northridge quake for leachate contamination into water and ground.

67-1  
cont'd

Section 2.2.9.2 Groundwater and Vadose Zone Monitoring states the location of the on-site ground water monitoring wells.

In addition to the proposed ground water monitoring wells on site, please address the need for off-site groundwater monitoring of all water supply wells within the sphere of influence of the Chiquita Canyon landfill. Please evaluate the sphere in any direction from the Chiquita Canyon Landfill, which would be dependent upon the hydrogeological conditions that exist.

67-2

Please look into a monitoring program that would detect incipient pollution of existing water supply wells located on nearby properties, as this would be considered part of providing improved public health and groundwater resource protection and assurance to the potentially impacted public that the landfill has not yet polluted their groundwater. This would provide a means of verifying the reliability of the predicted pollution of offsite groundwater.

67-3

In addition, please look into additional groundwater monitoring wells for development along the most probable pathways for leachate-polluted groundwater to move toward off-site properties. According to the 2013 ANNUAL GROUNDWATER MONITORING REPORT CHIQUITA CANYON LANDFILL COMPLIANCE FILE NO. CI-6231 CASTAIC, CALIFORNIA FOR CHIQUITA CANYON LANDFILL, <http://www.valverdecac.com/pdf/reports/2013AnnualGroundwaterMonitoringReport.pdf>, the document pictures depict the flow of the groundwater. As seen in pictures, the groundwater flows at times towards the 126 freeway and at other times towards the industrial park. Please include the need for ground water monitoring wells in both these directions along with other necessary groundwater flow sites, as there is a potential for the Santa Clara River to be affected.

67-4

Please address the decreased values of property located near the vicinity of the Chiquita Canyon Landfill. Establishing a landfill with inadequate buffer lands between the waste deposition area and adjacent properties leads to decreased property values. As seen in, Hirschfeld, S., Vesilind, A., and Pas, E., "Assessing the True Cost of Landfills," Waste Management & Research 10:471-484 (1992). <http://www.gfredlee.com/Landfills/Hirschfeld-LFCosts.pdf>. Studies conducted by Hirshfeld et al. reported that decreased property values have been found as far as three miles from the landfill. Hite et al., (2000) have discussed the potential impact of MSW landfills on nearby property values where they conclude that MSW landfills decrease the property values near the landfill. Individuals who own land immediately adjacent to a proposed landfill, as well as most others who own property within several miles of a landfill, can be expected to have their property values significantly decreased by the development of the landfill.

67-5

.I would like to thank you in advance for addressing my concerns. Please feel free to contact me concerning any of the above mentioned comments.

Sincerely,

Cynthia Kimura

# Letter No. 67

Cynthia Kimura  
29027 Elk Avenue  
Val Verde, CA 91384

## Response to Comment No. 67-1

Please see Topical Response #11 for a discussion of Geologic Hazards, as well as Topical Response #14 for a discussion of the Landfill Liner System.

With regard to the potential for liner leaks, please see Topical Response #10 for a discussion of Environmental Monitoring, including groundwater monitoring.

## Response to Comment No. 67-2

Please see Topical Response #10, Environmental Monitoring, for a discussion of groundwater quality monitoring.

## Response to Comment No. 67-3

Please see Topical Response #10, Environmental Monitoring, for a discussion of groundwater quality monitoring.

## Response to Comment No. 67-4

Please see Topical Response #10, Environmental Monitoring, for a discussion of groundwater quality monitoring.

## Response to Comment No. 67-5

The referenced studies are not applicable to the Proposed Project, as they apply only to new landfills being sited near residential areas, not to existing landfills continuing operation with long-established land uses, such as CCL. Further, a CCL Housing Price Impact Study (discussed in Topical Response #20, Property Values, and included in the Final EIR as Appendix L) was conducted to evaluate residential pricing trends in the vicinity of CCL. Please see Topical Response #20 for a full discussion of Property Values.



My name is Josephine Esplana

I live in 30124 Pocahantas Drive Val verde CA 91384

My phone is 661-310-6360

I am out of the forms for the comments regarding the Chiquita canyon landfill Expansion

I would like to bring your attention to the pollution issue.

Please find attached an air quality testing regarding the landfill. There are numerous high level of toxins in this report that are not dealt with

Basically there is no consequence for polluting and we pay the price by being exposed to pollutants

Please refer to this manual for the levels and warnings

If there is a church and they make too much noise they will be shut down until they correct the problem

In this case I would like the dump to be fined and operate at lower capacity until the levels are satisfactory with EPA recommendations

68-1

I DON'T HAVE AN EMAIL SET UP SO I AM USING ANOTHER RESIDENT EMAIL TO SEND YOU THIS. YOU CAN VERIFY MY ADDRESS AND RESIDENCE

## Letter No. 68

Josephine Esplana  
30124 Pocahantas Drive  
Val Verde, CA 91384

### Response to Comment No. 68-1

Please see Topical Response #1a, Existing Air Quality and Emissions, Monitoring, and Health Effects, as well as Topical Response #21, Public Health.

Iris Chi

**From:** Dave Bossert [westranchbeacon@gmail.com]  
**Sent:** Thursday, October 23, 2014 8:35 AM  
**To:** Iris Chi  
**Cc:** westranchbeacon  
**Subject:** Subject: Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my utmost personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision. This is an excellent and thoughtful plan for the landfill.

As a thirty year resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop - something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

69-1

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here. The landfill management has been fully engaged in the Santa Clarita Valley community.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to fully support the findings of the DEIR and the Master Plan Revision.

Please let me know if you have any questions or would like additional comments.

Sincerely,

David Bossert  
Resident & Community Volunteer of the Santa Clarita Valley

# Letter No. 69

David Bossert  
Santa Clarita, CA

Response to Comment No. 69-1

Comment acknowledged.

Iris Chi

**From:** Amy Daniels/WiSH [basketamy@sbcglobal.net]  
**Sent:** Thursday, October 23, 2014 9:19 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

70-1

Sincerely,

Amy

*Amy Daniels*  
*Executive Director and*  
*Board Secretary, WiSH Education Foundation Board of Directors*  
[www.wishscv.org](http://www.wishscv.org)  
*President, Hart Parent Organization*  
*Longaberger Independent Sales Consultant*  
[shopus.longaberger.com/amydaniels](http://shopus.longaberger.com/amydaniels)

# Letter No. 70

Amy Daniels

Response to Comment No. 70-1

Comment acknowledged.

Iris Chi

**From:** Fred Arnold [fred.arnold@affloans.com]  
**Sent:** Thursday, October 23, 2014 9:36 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

71-1

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations including the Chamber of Commerce I chaired in 2013, and events, which has demonstrated a true commitment to the community and the people that live and work here.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

Fred Arnold  
26816 Fairlain Drive  
Valencia, CA 91355  
Resident

American Family Funding  
28368 Constellation Rd #398  
Santa Clarita, CA 91355  
Building owner and Business manager  
2013 Chairman SCV Chamber

# Letter No. 71

Fred Arnold  
26816 Fairlain Dr.  
Valencia, CA 91355

## Response to Comment No. 71-1

Comment acknowledged.

Iris Chi

**From:** Mike Lebecki [michael.lebecki@gmail.com]  
**Sent:** Thursday, October 23, 2014 9:59 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop - something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

Mike Lebecki  
"Full Steam Ahead!"  
Lic#01044750  
RE/MAX of Santa Clarita  
27720 Dickason Dr.  
Valencia, CA 91355  
(661) 702-4555 Office  
(661) 702-4505 Fax  
(661) 205-6661 Mobile/Text  
mikelebecki.com  
[michael.lebecki@gmail.com](mailto:michael.lebecki@gmail.com)

72-1

(Feel free to text!)

...Sent from my iPhone

## Letter No. 72

Mike Lebecki  
27720 Dickason Dr.  
Valencia, CA 91355

### Response to Comment No. 72-1

Comment acknowledged.



Iris Chi

**From:** Gloria Mercado-Fortine [gmercado@earthlink.net]  
**Sent:** Thursday, October 23, 2014 10:09 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a life-long resident of the Santa Clarita Valley, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting by-products of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

73-1

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

Gloria Mercado-Fortine

*Gloria Mercado-Fortine*  
*Governing Board Member*  
*Wm. S. Hart School District*  
(661) 714-5041



# Letter No. 73

Gloria Mercado-Fortine

Response to Comment No. 73-1

Comment acknowledged.



Iris Chi

**From:** Montse Garriga [montse\_garriga@hotmail.com]  
**Sent:** Thursday, October 23, 2014 10:15 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

Chiquita Canyon has considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

The company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

74-1

Sincerely,  
Montse

# Letter No. 74

Montse Garriga

Response to Comment No. 74-1

Comment acknowledged.

Iris Chi

**From:** Brian Higgins [bhiggins1212@gmail.com]  
**Sent:** Thursday, October 23, 2014 10:28 AM  
**To:** Iris Chi  
**Subject:** Subject: Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

75-1

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

--  
[bhiggins1212@gmail.com](mailto:bhiggins1212@gmail.com)

Skype bhiggins12

Twitter @bhiggins12

# Letter No. 75

Brian Higgins

Response to Comment No. 75-1

Comment acknowledged.



Iris Chi

**From:** Margie Anne Clark [margie.anne.clark@gmail.com]  
**Sent:** Thursday, October 23, 2014 10:31 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays a crucial role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

Margie Anne Clark  
24610 Cordera Court  
Valencia, CA 91355  
661-312-0203  
[margie.anne.clark@gmail.com](mailto:margie.anne.clark@gmail.com)

76-1

# Letter No. 76

Margie Anne Clark  
24610 Cordera Court  
Valencia, CA 91355

## Response to Comment No. 76-1

Comment acknowledged.

Iris Chi

**From:** Barbara Myler [Barbara@SummitWestPR.com]  
**Sent:** Thursday, October 23, 2014 11:03 AM  
**To:** Iris Chi  
**Subject:** Subject: Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Subject: Chiquita Canyon DEIR Comments**

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident of 35 years, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon is carefully considering the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something we feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a commitment to the community and the people that live and work there.

I personally served for 20+ years coordinating the City of Santa Clarita’s “Pride Week” Community Clean-up. A small committee, including representatives of Chiquita Canyon Landfill, came together every year to plan this annual event to help the community dispose of large volumes of waste that couldn’t be disposed of at the resident’s weekly curbside trash service. With the Chiquita’s generous contribution and cooperation, we were able to facilitate a massive effort to keep our community, riverbeds, empty lots and homeowner’s private property clean. Most individuals were never aware of Chiquita’s significant and vital effort, going above and beyond the call of duty, that made this event possible every year. As a result of their support and real effort for this project and many, many others, Chiquita has been instrumental in helping maintain the quality of life in the Santa Clarita Valley. I have no doubt that they will continue their efforts to work with the community throughout the process of this Mater Plan Revision.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to our continued partnership with Chiquita Canyon and to helping protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

*Barbara*  
**Barbara C. Myler**  
**President/CEO**  
**Summit West Public Relations & Marketing**  
~and~

77-1

**Owner/Producer**  
**Valencia Jazz & Blues Concert Series**  
P.O. Box 55133  
Valencia, CA 91385  
office: 661.290.2911  
cell: 661.373.8700  
fax: 661.290.2955  
email: [Barbara@SummitWestPR.com](mailto:Barbara@SummitWestPR.com)  
website: [www.ValenciaJazzandBlues.com](http://www.ValenciaJazzandBlues.com)

## Letter No. 77

Barbara Myler  
P.O. Box 55133  
Valencia, CA 91385

### Response to Comment No. 77-1

Comment acknowledged.



**Iris Chi**

---

**From:** Rachelle Dardeau [rdardeau@scv-seniorcenter.org]  
**Sent:** Thursday, October 23, 2014 11:08 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, especially services provided by non-profit organizations for the public benefit. Chiquita Canyon has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

Rachelle Dardeau

*Rachelle Dardeau, MS, MSW  
Executive Director  
Santa Clarita Valley Committee on Aging*

78-1

# **SCV Senior Center**

SANTA CLARITA VALLEY COMMITTEE ON AGING

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Phone (661) 259-9444 Fax (661) 255-3195

[www.scv-seniorcenter.org](http://www.scv-seniorcenter.org)

# Letter No. 78

Rachelle Dardeau  
22800 Market Street  
Santa Clarita, CA 91321

## Response to Comment No. 78-1

Comment acknowledged.



Iris Chi

**From:** lq0772gm Santa Clarita - Valencia, CA [lq0772gm@laquinta.com]  
**Sent:** Thursday, October 23, 2014 11:20 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Support Letter

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

Sue Nevius  
General Manager  
La Quinta Inn & Suites  
25201 The Old Road  
Stevenson Ranch, Ca 91381  
Phone: 661-286-1111  
Fax: 661-286-1141  
[www.lq.com](http://www.lq.com)

79-1

## Letter No. 79

Sue Nevius  
25201 The Old Road  
Stevenson Ranch, CA 91381

### Response to Comment No. 79-1

Comment acknowledged.

Iris Chi

**From:** Don Fleming [dfleming@valenciaacura.com]  
**Sent:** Thursday, October 23, 2014 11:41 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

Don Fleming

80-1

# Letter No. 80

Don Fleming, Resident

Response to Comment No. 80-1

Comment acknowledged.

Iris Chi

**From:** setarehsbooked@gmail.com on behalf of Sitara [ourvalleysantaclarita@gmail.com]  
**Sent:** Thursday, October 23, 2014 11:44 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,  
Setareh Khatibi

81-1

# Letter No. 81

Setareh Khatibi

Response to Comment No. 81-1

Comment acknowledged.

Iris Chi

**From:** Linda Hafizi [linda@santaclaritamagazine.com]  
**Sent:** Thursday, October 23, 2014 11:56 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

We are writing to express our personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As local residents, we recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

We know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

We look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, we are pleased to support the findings of the DEIR and the Master Plan Revision.

82-1

Sincerely,

Moe & Linda Hafizi

Publishers

The Magazine of Santa Clarita &

elite Magazine

Prime Publications, Inc

28318 Constellation Road

Valencia, CA 91355

office: 661-294-4444 ext. 113

cell: 661-510-5519

[www.santaclaritamagazine.com](http://www.santaclaritamagazine.com)

[www.sevelitemagazine.com](http://www.sevelitemagazine.com)

## Letter No. 82

Moe and Linda Hafizi  
28318 Constellation Road  
Valencia, CA 91355

### Response to Comment No. 82-1

Comment acknowledged.



Iris Chi

**From:** Vanessa Brookman [VBrookman@sbcglobal.net]  
**Sent:** Thursday, October 23, 2014 12:08 PM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR - Comments (Support)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision. I have a unique and educated perspective having sat on the Val Verde Community Advisory Committee for the past five years, both as Corporate Secretary and President, as well as being a long time resident of Val Verde. Chiquita Canyon has been serving the region continuously for more than four decades, and has room to expand its operating footprint, so to ask them to relocate a perfectly fine operation of this magnitude is unreasonable and more over, unnecessary.

Chiquita Canyon Landfill plays an important and necessary role in Santa Clarita Valley and Los Angeles County. Locals here who cry that “*our local landfill should only take in local trash*” are uneducated, unreasonable and should just be discounted. Granting the new CUP is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

Of course no one *wants* a Landfill in their backyard, but one is here, and has been here for a long, long time. I know for a fact this facility is run in the best way possible, it is clean, it is efficient and it is as safe as can be. I have studied the governmental reports that are provided monthly, quarterly and bi-annually and have zero concerns over the operations.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through constant monitoring and necessary mitigations, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, *SOME OF WHICH* might never have happened without their support. For this and many other reasons I feel CCL has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

83-1

*Vanessa D. Brookman*

Val Verde, CA Resident (*July 2005 – September 2014*)

Past President – Val Verde Community Advisory Committee (*January 2010- September 2014*)

Past Vice President - Castaic Town Council Member (*January 2007 – December 2011*)

Past Board Member - Val Verde Community Benefits Funding Committee (*December 2007- April 2009*)

# Letter No. 83

Vanessa Brookman  
Val Verde, CA

Response to Comment No. 83-1

Comment acknowledged.



Iris Chi

**From:** Linda Lieblang [llieblang@scv-seniorcenter.org]  
**Sent:** Thursday, October 23, 2014 12:09 PM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

*Linda Alexander-Lieblang*

Linda Alexander-Lieblang, RMT, MA  
Associate Executive Director  
[llieblang@scv-seniorcenter.org](mailto:llieblang@scv-seniorcenter.org)

84-1

# **SCV Senior Center**

SANTA CLARITA VALLEY COMMITTEE ON AGING

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Phone (661) 259-9444 Fax (661) 255-3195

## Letter No. 84

Linda Lieblang  
22800 Market Street  
Santa Clarita, CA 91321

### Response to Comment No. 84-1

Comment acknowledged.



Iris Chi

**From:** Sue Reynolds [sreynolds@hartdistrict.org]  
**Sent:** Thursday, October 23, 2014 12:26 PM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

--

Sue Reynolds  
Career Development  
Wm. S. Hart School District

85-1

[sreynolds@hartdistrict.org](mailto:sreynolds@hartdistrict.org)  
661.259.0033 Extension 232  
661.755.3308 Cell

# Letter No. 85

Sue Reynolds

Response to Comment No. 85-1

Comment acknowledged.



Iris Chi

**From:** Marty Kreisler [mkreisler@ca.rr.com]  
**Sent:** Thursday, October 23, 2014 12:46 PM  
**To:** Iris Chi  
**Subject:** Personal support for Chiquita Canyon Landfill

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

October 23, 2014

Dear Ms. Chi:

I am writing to join many other organizations and individuals in my personal support for Chiquita Canyon Landfill's DEIR for the Master Plan Revision.

As a resident of Castaic, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. In looking at the DEIR, it is clear that Chiquita Canyon is carefully considering the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop. I recognize the fact that this is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents. Right now most of us don't even know or think about our Chiquita Canyon neighbor. I was able to take a tour recently and see myself how they have been successful in mitigating any noise, dust or odor.

86-1

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site's Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events. I can personally attest to that, and appreciate very much their positive involvement in seeing us have a better community.

I look forward to our Castaic community having Chiquita Canyon Landfill as our neighbor and trust that their plans will help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

Martin Kreisler

Castaic Resident serving on the Castaic Area Town Council (Region 1)

# Letter No. 86

Martin Kreisler

Response to Comment No. 86-1

Comment acknowledged.



Iris Chi

**From:** Jeri Seratti-Goldman [jerseratti@gmail.com]  
**Sent:** Thursday, October 23, 2014 1:33 PM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

87-1

Sincerely,

Jeri Seratti-Goldman  
KHTS AM 1220  
Santa Clarita's Hometown Station  
27225 Camp Plenty Road Unit 8  
Santa Clarita, CA 91351  
[jeri@hometownstation.com](mailto:jeri@hometownstation.com)  
661-298-1220 office  
661-298-2020 fax  
[www.hometownstation.com](http://www.hometownstation.com)

## Letter No. 87

Jeri Seratti-Goldman  
27225 Camp Plenty Rd., Unit 8  
Santa Clarita, CA 91351

### Response to Comment No. 87-1

Comment acknowledged.

Iris Chi

**From:** ReneeSabol@aol.com  
**Sent:** Thursday, October 23, 2014 2:31 PM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon Landfill DEIR

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon is carefully considering the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something we feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a commitment to the community and the people that live and work there.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to our continued partnership with Chiquita Canyon and to helping protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

88-1

Sincerely,

Renee Sabol

President

Castaic Chamber of Commerce

# Letter No. 88

Renee Sabol

Response to Comment No. 88-1

Comment acknowledged.

Iris Chi

**From:** Clay Friedman [clayfriedman@me.com]  
**Sent:** Thursday, October 23, 2014 2:45 PM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

Clay Friedman  
Castaic Residence

89-1

# Letter No. 89

Clay Friedman  
Castaic, CA

## Response to Comment No. 89-1

Comment acknowledged.

Iris Chi

**From:** Jack Crawford [store4175@theupsstore.com]  
**Sent:** Thursday, October 23, 2014 2:50 PM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon Landfill

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision.

As a Saugus resident and Castaic business owner, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop - something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

90-1

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

Jack Crawford

# Letter No. 90

Jack Crawford  
Saugus, CA

Response to Comment No. 90-1

Comment acknowledged.

**Iris Chi**

---

**From:** Ed Masterson [edmasterson@sosentertainment.com]  
**Sent:** Thursday, October 23, 2014 3:40 PM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments...

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi:

Thank you in advance for your time, consideration and kindness...I am writing to express my support for Chiquita Canyon Landfill's Draft Environmental Impact Report for the Master Plan Revision.

I know you are receiving a lot of emails today, so thank you for being kind enough to consider my comments among them...

Chiquita Canyon has been a mainstay in our area / region for over forty years, and of course plays a pivotal role in the solid waste management arena of the Santa Clarita Valley and Los Angeles County. One of the topics of discussion is the potential shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies. It seems that Chiquita Canyon has given careful consideration to the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. With their plans for monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Chiquita Canyon has been, and continues to be an important member and supporter of the community, as evidenced by the site's Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here. I know the company and its representatives personally, and I know they have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I know Chiquita Canyon will continue to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come...I respect and admire this organization, and I am very pleased to support the findings of the Draft EIR and the Master Plan Revision.

Best regards,

Ed

91-1

Ed Masterson  
Sales & Marketing Manager  
*SOS Entertainment (site - video)*  
(661) 424-1767 (o)  
(661) 251-0010 (f)  
(661) 510-5333 (c)  
[edmasterson@sosentertainment.com](mailto:edmasterson@sosentertainment.com)



# Letter No. 91

Ed Masterson

Response to Comment No. 91-1

Comment acknowledged.



Iris Chi

**From:** Maria Gutzeit [mgutzeit@compliance-plus.net]  
**Sent:** Thursday, October 23, 2014 3:45 PM  
**To:** Iris Chi  
**Subject:** Support for Chiquita Canyon Expansion Project EIR

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello Ms. Chi:

As a Santa Clarita resident and also as an engineer working in the field of environmental compliance for industry, I would like to express support for the Chiquita Canyon landfill project.

I have worked in the solid waste industry for many years and know this is a much needed service for our community. Though I fully support landfill alternatives which are continually being explored, at the present time we simply cannot recycle 100% of our waste stream. We need disposal options that minimize costs to residents and limit the use of long-distance diesel-emission-producing truck traffic. I also know many neighboring counties limit out-of-area waste, and LA County has limited disposal options.

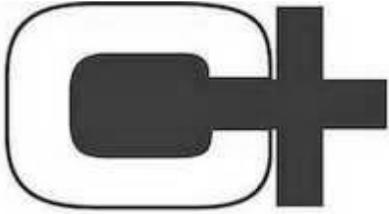
As a site landfill engineer early in my career, I am aware there are ongoing monitoring requirements for air and groundwater protection. SCAQMD, RWQCB and others require extensive reporting and corrective actions if any negative issues occur at solid waste landfills, and I trust they will be asked to do their best to ensure the proper operation of the landfill so that no offsite adverse effects occur. Since the landfill is pre-existing, and serves as a current source of gas-to-energy, resources and incentive exists to monitor and correct any issues that may arise in the future, either from the current fill or future fill. I would also expect that new areas will be designed with state of the art practices, since regulations are continually evolving for environmental protection.

I am, in generality, aware of residential concerns about odors and offsite impacts, though I have not worked with or looked at any of the monitoring reports for the site. I believe, based on industry experience, that any offsite impacts, if they occur, can be fixed by adjusting the gas collection or groundwater well networks. I sincerely hope that residential concerns, if they occur, will always be addressed promptly and thoroughly because of professional management and agency oversight.

While the solid waste industry and regulators work hard to develop and permit alternatives to landfills we need to handle the waste generated in our region the best way possible, with the lowest net environmental impact. I believe at this time waste disposal is best done at existing facilities, using routes that minimize truck traffic and associated diesel pollution.

92-1

Thank you for your work on this project.



## **Compliance Plus**

**Maria Gutzeit**, BS ChE  
Principal Engineer  
[www.Compliance-Plus.net](http://www.Compliance-Plus.net)  
[mgutzeit@compliance-plus.net](mailto:mgutzeit@compliance-plus.net)  
office 661-670-0332  
cell 661-310-6005  
fax 661-670-0344

# Letter No. 92

Maria Gutzeit  
Santa Clarita, CA

Response to Comment No. 92-1

Comment acknowledged.



Iris Chi

**From:** Paul De La Cerda [pauldelacerda1@gmail.com]  
**Sent:** Thursday, October 23, 2014 5:31 PM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon DEIR Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Chi,

I am writing to express my support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision. As a local resident, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County.

I am confident that the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

93-1

Sincerely,

Paul De La Cerda, MBA  
Board President  
Saugus Union School District  
[www.saugusud.org](http://www.saugusud.org)

# Letter No. 93

Paul De La Cerda

Response to Comment No. 93-1

Comment acknowledged.



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## #94

October 23, 2014

Ms. Iris Chi  
County of Los Angeles  
Department of Regional Planning  
[ichi@planning.lacounty.gov](mailto:ichi@planning.lacounty.gov)

Dear Ms. Chi:

I am writing to express my personal support for Chiquita Canyon Landfill's DEIR for the Master Plan Revision.

As a resident of Castaic for more than 15 years, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon is carefully considering the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something we feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

The proposed increased disposal rate and volume, extension, and increased elevation will allow the life of the landfill to extend for more than two decades. At the same time, the higher elevation of the landfill will be barely visible over the steep surrounding ridgelines, if at all, which is key to the homes and businesses near the landfill, as well as the community-at-large.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site's Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated an exemplary commitment to the community and the people that live and work there.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to our continued partnership with Chiquita Canyon and to helping protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

Flo Lawrence

94-1

## Letter No. 94

Flo Lawrence  
31657 Ridge Route Rd., Suite C-204  
Castaic, CA 91384

### Response to Comment No. 94-1

Comment acknowledged.



#95

A coalition of community and business leaders focused on the health and vitality of California's transportation backbone:  
— Interstate 5 —

October 23, 2014

Ms. Iris Chi  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

**Subject: Chiquita Canyon Landfill Master Plan Revisions Draft Environmental Impact Report**

Dear Ms. Chi:

I am writing to express the Golden State Gateway Coalition's support for the Chiquita Canyon Landfill expansion, based on the data and conclusions presented and analyzed in the recently released Draft Environmental Impact Report (DEIR).

The Golden State Gateway Coalition is a non-profit organization focused on improving roadway transportation in north Los Angeles County, with emphasis on the Interstate 5 corridor. Transportation and waste management are linked infrastructure elements that, when functioning effectively and efficiently, contribute to our north county communities' quality of life.

The need for, and the benefits of expanding the landfill operations appear to be carefully considered and supported by the conclusion of the studies cited in the DEIR document. We have seen extensive community outreach and community input solicited by the operator leading to these conclusions. Where potential impacts have been identified, they have been diligently addressed through mitigation plans proposed by the landfill operator.

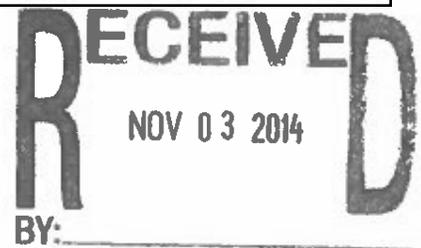
The DEIR, in its section on traffic and transportation, reflects minimal permanent impact on onsite and offsite traffic circulation and access: "The proposed project would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system; substantially increase hazards due to a design feature; result in inadequate emergency access or parking capacity; or conflict with adopted policies, plans or programs supporting alternative transportation."

In closing, I would note that the Chiquita Canyon Landfill has been a consistently responsible neighbor, operating in this community since 1972, serving the city of Santa Clarita and neighboring communities. Based on historical performance, and their open communications regarding the proposed expansion, we would expect the operators to continue to meet, and be responsive to, the needs of the communities and customers they serve.

Sincerely,

Victor Lindenheim  
Executive Director

C: T. DiPrima



95-1

# Letter No. 95

Victor Lindenheim  
Golden State Gateway Coalition  
25030 Avenue Tibbitts, Suite K  
Valencia, CA 91355

## Response to Comment No. 95-1

Comment acknowledged.

Iris Chi

**From:** Chris Chapleau [cchapleau@abm1.com]  
**Sent:** Friday, October 24, 2014 7:32 AM  
**To:** Iris Chi  
**Subject:** Chiquita Canyon Master Plan Revision

Hi Ms. Chi, hope you had a great week and are ready for the weekend☺ I am writing to express my personal support for Chiquita Canyon Landfill’s DEIR for the Master Plan Revision. As a local resident and business owner, I recognize that Chiquita Canyon has been serving the region continuously for more than four decades, and plays an important role in the solid waste management of the Santa Clarita Valley and Los Angeles County. This is especially important given the findings by LA County Public Works that point to a potential disposal capacity shortfall beginning this year if there is no expansion of existing landfills, no new landfills, and no additional capacity from alternative technologies.

In looking at the DEIR, it is clear that Chiquita Canyon has carefully considered the potential environmental, noise, traffic, and cultural impacts of daily operation, as well as the resulting byproducts of the construction and expansion process. Through monitoring and mitigation, the landfill will be able to address needs and issues as they develop – something I feel is vital to protecting the long-term interests of the region and ensuring the ongoing support of area residents.

Over the years, Chiquita Canyon has been an important member and supporter of the community. This is reflected via the site’s Clean Energy Facility, environmental protection systems, and responsible handling of incoming solid waste. Representatives from the company have also been involved with key local organizations and events, which has demonstrated a true commitment to the community and the people that live and work here.

I know the company and its representatives have practiced due diligence regarding key current and future issues, and have measures in place to address key concerns throughout construction and daily operation.

I look forward to a continued partnership with Chiquita Canyon and to help protect the solid waste needs of the Santa Clarita Valley and the LA region for years to come. As a result, I am pleased to support the findings of the DEIR and the Master Plan Revision.

Sincerely,

Chris Chapleau  
(661) 912-1398  
Digital Solutions Consultant  
*Chairman of the Board - Valley Industry Association*  
*Board of Directors - VIA Education Foundation*



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96-1

## Letter No. 96

Chris Chapleau  
26017 Huntington Lane, Unit E  
Valencia, CA 93534

### Response to Comment No. 96-1

Comment acknowledged.

Iris Chi

**From:** Randal G. Winter [rg@rgwinter.com]  
**Sent:** Saturday, October 25, 2014 7:57 AM  
**To:** Iris Chi  
**Subject:** Support for DEIR Chiquita Canyon Landfill Expansion

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Mr. Chi,

I am in support of the DEIR for Chiquita Canyon.  
The landfill has been doing a good job at keeping the place clean and safe.  
We need a place to take our trash and the Chiquita Landfill makes the most since.

97-1

Randal Winter

Randal G. Winter, President  
28348 Constellation Road  
Suite 810  
Santa Clarita, CA 91355  
License #395715  
(661) 799-8089  
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## Letter No. 97

Randall Winter  
28348 Constellation Rd., Suite 810  
Santa Clarita, CA 91355

### Response to Comment No. 97-1

Comment acknowledged.