

## Simi Valley Landfill Expansion Task Force

436 Sunbonnet Street, Simi Valley, CA 93065

9 September 2010

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

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

Dear Ms. Linder:

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

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

### **Task Force Summary:**

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

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

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

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

### **Significant Environmental Impacts per CEQA**

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

### **CEQA Statement of Overriding Consideration:**

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

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

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

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

### **Economic and Social Impact Deficiencies:**

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

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

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

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

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

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

### **Mitigation Measures:**

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

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

The Task Force is deeply troubled by the faith the County appears to place in the applicant in adhering to each and every mitigation measure. The Task Force implores

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

### **Project Purpose and Project Objectives:**

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

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

LA County 1,337  
Sun Valley 168  
Anaheim 768

Van Nuys 390  
Pacoima 171  
Granada Hills 144

Play del Rey 157  
Huntington Beach 89

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

### **Air Quality Report Deficiencies**

As previously mentioned, the RDEIR includes a newly revised Air Quality Report. This substantial re-write was necessary to address the significant greenhouse gas (GHG) emissions caused by the project construction and operations, and expansions to the liquefied natural gas processing facility (LFGTLNG). The RDEIR concludes that the GHG emissions will exceed annual thresholds suggested by California State and

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Ventura County (10,000 CO<sub>2</sub>e metric tons a year) therefore they are a significant impact and “cumulatively considerable.” Furthermore, no mention is made of AB 32’s goal of reducing GHG emission to 80 percent below the 1990 level by 2050 and how the project will comply with this goal.

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

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

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

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

The estimated GHG emissions currently caused by the gas flares represent 50,926 metric tons of carbon (CO<sub>2</sub>e) and account for 29% of the total landfill existing GHG emissions. Putting this into perspective, it is about the amount of GHG generated by the annual electricity used by 6,200 homes – or 5,729,856 gallons of gasoline. This is a phenomenal disclosure. So significant is the GHG emissions attributed to the landfill flares that the project was revised to increase the LFGTLNG facility to accommodate landfill gas diverted from the flares. The Task Force finds this existing condition caused by the gas flares of particular concern and the County should demand that this existing environmental impact be addressed - immediately. The County must disclose how the current project complies with Title 17, CCR Article 4, Subarticle 6, sections 95460 to 95477 in which landfills that generate methane over a specific threshold must install landfill gas control equipment and/or perform specified monitoring and reporting.

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

### **Hazards Assessment**

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

### **Landfill Liners**

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

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

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

### **Alternatives Not Addressed**

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

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

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

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

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

### **Sustainable Simi Valley**



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

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

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

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

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

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

Sincerely,

Barbra Williamson  
Chair

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

Attachment A – Summary of Significant Impacts Table

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

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

**Table 1:** Summary of Environmental Issues with Significant Impacts Before Mitigation<sup>1</sup>

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

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

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