

Page/Lines	DEIR
ES-23	Currently, SVLRC is permitted for a maximum limit of 822 roundtrips per day. Based on analysis of the current average waste delivery, the SVLRC currently receives approximately 470 truck round trips. This includes approximately 178 vehicle round trips hauling MSW and 292 vehicles round trips delivering recyclables. As part of the proposed project, SVLRC is project to generate up to a total of 892 vehicle trips (roundtrips) per day. This number involves up to 6,000 tpd of solid waste (547 round trips) and up to 3,250 tpd of recyclable materials (345 round trips).
ES-3	bringing the total maximum projected vehicle trips (roundtrips) to 1,297 per day. Thus, the proposed SVLRC Expansion Project would result in a net increase of 475 vehicle roundtrips per day above SVLRC's permitted limit and 786 vehicle round trips above the baseline.
ES-3/29	Municipal solid waste and recyclables from the local community
ES-6 Table ES.3-1	States that the Proposed Project (Column 2) will have a total capacity of (million yd3) of 123 (row 5). Page ES-2 line 11 states 130.2 million cubic yards.
ES-6 Table ES.3-1	The landfill height (above MSL) for the Proposed Project is stated at 1,270. The existing permitted height is 1,118.
ES-11/22-25	the main source of water would be imported State San Joaquin Delta water. Because a water availability letter would be submitted by CMWD with the proposed project application, verifying that adequate water supplies are available; an updated water supply plan would be included as part of a Master Development Plan; and the CMWD is considered a permanent source of water.
ES-11/31	In addition, groundwater quality impacts due to landfill gas, pesticides, oil field impact, and laboratory contaminants would not become incrementally greater than the baseline condition as more waste is placed into the landfill.

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ES-12/12-16	However, recent on-site sampling data indicated that surface water quality objectives were exceeded for nitrates, nitrates, sulfate, total dissolved solids, total suspended solids, specific conductance, and several metals, including iron, lead, and mercury. Because 1) existing surface water quality at the SVLRC exceeds Basin Plan and Federal EPA benchmark water quality objectives, thus contributing to impairment of the Calleguas Creek watershed; 2) there is no indication that future landfill operations would be different from existing landfill operations; 3) currently contaminated runoff from the existing landfill would be co-mingled with runoff from the proposed expansion; and 4) a toe barrier liquids from the landfill, possible containing groundwater- based pollutants, would continue to be used for dust control surface water quality impacts are considered significant.
ES-12/26-28	The proposed landfill expansion would fill the Alamos Canyon tributary creek and substantially change the drainage performance of the drainage area., effectively eliminating the existing 100 year flood storage capacity of the tributary creek.
ES-12/33-25	The structural integrity of the detention basin could be undermined by erosive floodwaters along Alamos Canyon Creek, resulting in significant flooding impacts.
ES-13/23-24	Construction and operational activities could adversely affect wildlife migration in Breas and Alamos canyons in a variety of ways.
ES-13/30-31	Construction and operational activities would result in a substantial direct reduction in population and direct long-term loss and degradation of habitat of two locally important plant species
ES-13/40-45	Direct loss of {habitats} as a result of landfill expansion represent a substantial reduction in these locally important communities, a long-term impact. In addition to direct loss of these locally important communities, expansion of the landfill would contribute to the degradation of habitat quality in adjacent areas due to off-site effects as well as introduction and spread of invasive non-native species in the project vicinity of the landfill.

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ES-14/5-6	However, the conversion and loss of locally important agricultural soils to industrial/commercial uses would be a significant impact on agricultural resource.
ES-14/13-17	fugitive dust emissions would occur within the farmlands of local importance directly west of the project site in Los Alamos Canyon.
ES-14/30-31	The proposed landfill footprint and elevations would be visible to individuals traveling eastbound on SR-118 and thus obstruct important visual resources experienced from SR-118, resulting in a significant impact to a scenic highway.
ES-14/39-41	However, as the final landfill contour would extend above the existing horizon defined by the Santa Susana Mountain ridgelines and due to the proximity of the viewer, impacts on visual resource from the Alamos Canyon Trail vantage point would be significant.
	As such, the project would introduce a substantial amount of new night light and glare, representing a significant change in the level of night light illumination when compared to what is presently generated over the project site.
ES-15/27-30	In addition, the alluvial areas in canyon bottoms of the project areas would be subject to liquefaction in the event of severe seismically induced ground movement, potentially resulting in damage to site structures such as buildings, containment structures, leachate and gas collection facilities, and surface drainage facilities during project operations.
ES-16/34-35	the overall impact of the proposed project on paleontolgical resources would still be considered significant
ES-17	The SLVRC is located in a high wildfire hazard area, as it is surrounded by uncultivated, flammable vegetation in the form of {vegetation}. Additionally, sufficient water pressure is available for fire fighting purposes a the SVLRC.
ES-17	as well as all other relevant
ES-19/5	The Existing with project peak hour
ES-19	The total new trips from the proposed expansion is 562 am peak hour PCE trips (246 inbound and 316 outbound) and 148 pm peak hour PCE trips (49 inbound and 99 outbound).
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ES-19/22-24	,all of the study freeway segments are project to continue to operate at unacceptable LOS D and E during the am peak hour and two of the three study segments are projected to continue to operate at unacceptable LOS D and E during the pm peak hours.
ES-19/31-40	Caltrans is currently in the process of environmental review A separate projectanticipated to improve the LOSshould improve LOS.
ES-20/7-17	assure adequate potable and non-potable water for landfill operations
ES-20/30-35	The Ventura County Environmental Health Division determined that because the public sewer system with capacity for additional wastewater load is not available within one-half mile of the SVLRC the proposed project is expected to meet the remaining two Sewer Policy exception conditions. Due to the size of the facility, the proposed project is expected to meet exception conditions #1. The proposed project would be expected to meet the three Ventura County Sewer Policy exception conditions and would not be required to connect to a public sewer system.
ES-20/39-39	the Board would likely take jurisdiction over permitting the proposed on-site wastewater treatment plant under an individual Waste Discharge Requirements (WDR) permit.
ES-21/5	A capacity study was completed to assess the future landfill capacity in Ventura County as it would be affected by the proposed project.
ES-21/7-9	The results of the capacity indicated that the SVLRC would result in the County reaching its 15 year capacity in approximately 2060 based on the assumptions used in the model.

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ES-21/36-38 Es-22/20-33	, the proposed development would impede future development of recreation parks/facilities and regional trails resulting in a significant impact on recreational resources. These pollutant nonattainment conditions within the project region are considered to be cumulatively significant. Impacts of multiple construction projects along with the proposed project could be cumulatively considerable. In addition, project construction and operations would produce emissions that would exceed the VCAPCD daily ROC and NOx emission thresholds for each modeled year. However, all other criteria pollutant impacts identified above would remain significant and unavoidable. Existing future project construction and operational activities would add additional air emission burdens to these significant levels of project emissions. Thus, the proposed project with mitigation would produce cumulatively considerable and unavoidable contributions to O3, No2, PM10, and PM2.5 levels.
ES-23/12-18	Thus, the issue of global climate change is a cumulative impact and an appreciable impact on global climate change would occur when GHG emissions from a project combine with GHG emissions from other man-made activities on a global scale. The proposed project would produce GHG emissions that would exceed levels of GHG emissions produced from the existing SVLRC. The significance of the impacts in the absence of established criteria is not determined.

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ES-23/23-32	CMWD intends to initiate groundwater pumping from this basin. Because a water availability letter would be submitted by CMWD with the proposed project application, verifying that adequate water supplies are available; an update water plan would be included as part of a Master Development Plan However, because of the uncertainty associated with future groundwater withdrawals by other users within he already over drafted Los Posas basin, the project's contribution to cumulative effects would potentially result in significant cumulative impact on groundwater quantity.
ES-24/15-17	Calleguas Creek watershed, which is considered an impaired water body due to water column and sediment toxicity, organophosphate pesticides in water, and chloropyrifos in fish tissue. The cumulative impact is significant and the contribution of the proposed project is cumulatively considerable.
ES-25/12-16	Together with past development, they would incrementally contribute to cumulative adverse impacts on agricultural resources. Cumulative impacts on agricultural resources due to dust may result from the combined incremental impact of increases in dust on agricultural parcels.
ES-25/25-26	Therefore, the proposed project would result in a cumulatively considerable contribution to significant cumulative impacts associated with increases of dust on agricultural resources.

Page/Lines	DEIR
ES-25/36-39	Construction and operation of the proposed project would obstruct scenic views of the Santa Susana Mountain Range from the SR-118 scenic view shed resulting in cumulatively considerable contribution to significant cumulative impacts associated with obstruction of important public views from the SR-118 scenic viewshed.
ES-25/44-45	Therefore, cumulative impacts on scenic areas/features from the Alamos Canyon Trail would be cumulatively considerable.
ES-30/2-3	, there is a regional shortage of water pressure, which potentially affects fire fighting capabilities .
ES-31/13-14	Thus, the proposed development would impede future development of recreation parks/facilities and regional trails and impacts to these future facilities would be significant.
	EXECUTIVE SUMMARY TABLE - ES32-54
ES-32	LU-1: The applicant shall pay a one-time fee (as determined by decision making body) to a County approved low income housing entity or an established housing trust fund to assist in providing for construction of affordable housing within the vicinity of Simi Valley.
ES-33	AQ-1: Contractor to minimize idling time, maintain equipment engines, lengthen the construction period during smog season. Encourage the use of alternatively fueled construction equipment such as compressed natural gas or electricity if feasible.

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ES-33	AQ-2: The calculation of unmitigated fugitive dust emissions from proposed construction activities is based upon compliance with VCAQMD Rule 55, Fugitive Dust, which is assumed to produce a 50 percent reduction in PM10 emissions from uncontrolled levels.
ES-35	AQ-3: Beginning in 2009, convert equipment to engines with EPA Tier 3 standards, where feasible.
ES-35	AQ-4; This would occur with the use of rigorous watering of the site and other control measures such as a limitation of vehicle speeds to 15 mph on-site.
ES-35	AQ-5;recommends implementing an Emissions Reduction Program to ensure additional mitigation of air quality impacts by requiring the project proponent to contribute funds for programs that reduce air pollutant emissions from non-project sources. However, while several municipal jurisdictions in the county have enacted air emissions mitigation programs in the form of Transportation Demand Management (TDM) programs, Ventura County has not established a Government Code section 660000 fee rule or made a Board of Supervisors commitment to adopt such a fee rule to a access, collect and spend such fees on mitigation programs
	some other legally enforceable, feasible mechanism to achieve the same result is required. In this instance, a legally enforceable agreement between the County of Ventura, VCAPCD and the applicant (WMI) could be executedpay the assessed fees over a time periodfees would be used by VCAPCD.
	It is uncertain the extent to which the SVLRC Emissions Reduction Program would offset overall project-related vehicular emissions and it is not possible to calculate what those reductions might be because the specific emission mitigation projects are unknown at this time. However, implementing an Emissions Reduction Program Agreement for the proposed Simi Valley Landfill expansion project is considered an effective emission reduction measure.

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ES-37 ES-37	AQ-6; Odor Control Plan:implement Condition Number 41, Odor Control Plan in CUP 314207 during proposed operations at the SVLRC. This plan shall be updated as deemed necessary to comply with current regulations by the VCEHD and Planning Division. Impact AQ-70: Potential incremental contributions from the project to global climate change. See AQ-3
ES-39	WR-3: Detention/Sedimentation Basin Armoring:shall be armored sufficiently to withstand erosive flow associated with a 100-year storm event along Alamos Canyon Creek.
ES-39	BIO-1: In the event of positive surveys results, the project applicant would consult with the USFWS to determine whether formal Section 7 consultation should be initiated.
ES-41	Bio-4: 2 - project site or other property
ES-42	Bio-4: 11protection of the mitigation sites in perpetuity. Bio-5: The permitted shall implement vector control methods to deter refuse scavenging species such as gulls and crows from the water disposal area. In the vicinity of Alamos Canyon, vector control methods (such as noisemakers and propane cannons, distress call, and use of falcons and dogs) that could result in the avoidance of the use of Alamos canyon as a wildlife corridor shall be avoided.
	Bio-6:in and adjacent to the Alamos Canyon wildlife corridor
ES-43	Bio-8: Because it is not known which of these measures would be technically feasible, the standard for success of this measure will be implementation and maintenance of three or more of the actions identified below, which have been previously identified by experts as actions that would facilitate wildlife crossing under SR-118 plus the two measures identified below that are applicable to all three crossings.
ES-45	Bio-8: Additionally, collaboration should be done with local groups to secure conservation easements on properties between

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	Bio-9: These measures shall be updated as necessary and applied to the proposed project."
	BIO-9:portable wind fences
ES-47	AG-1: Soils impact - mitigation - none feasible
	AG-2 Dust - mitigation impact
ES-48	Impact VIS-1: Scenic Highways - mitigation - none feasible
	Impact VIS-2: Scenic Areas/features - All landscaping plans shall follow the Ventura County Guide to Landscape Plans guidelines.
	VIS-2: Glare. Develop a lighting plan
ES-50	Geo-1: Paleontological Mitigation Program: An updated/expanded PMP shall be submitted by Waste Management to the County for review and approval.
	Cul-1:avoid Wharton Ranch
ES-52	WS-2: Water supply quantity.
ES-54	REC-1: Local parks/Facilities: The applicant shall pay in lieu fees for local parks/facilities.
1-1, 33	1.2 Project Purpose and Need

Page/Lines	DEIR
1-1, 29	SVLRC engages in recycling
1-1,34-35	The purpose of the proposed project is to provide long term waste management capability within the Ventura County.
1-1,35-37	Communities within the counties of Ventura and Los Angeles that comprise the major customers of the SVLRC are expected to experience population increases during the planning period of the proposed project (to 2054).
1-2. , 7-9	WMC seeks, via this proposed project, to extend the site life and to continue providing a solid waste disposal facility that would adequately serve the areas beyond 2050.
1-2, 10-27	Project Objectives

Page/Lines	DEIR
1-4, 2	In order to receive a revised SWFP (Solid Waste Facility Permit) the landfill operator must submit an application to the EHD (Ventura County Environmental Health Division).
1-4, 11-12	In addition to these major permits, various other permits would be required from Ventura County Building and Safety, Environmental Health, and Fire Department
1-5 to 1-20	Table 1-2. Comments Received During the Public Scoping Process
	2 PROJECT DESCRIPTION
2-1.	Table 2.1-1 Existing and Proposed CUP Expansion Parcels

Page/Lines	DEIR
2-6, 20-21	From 1971 until 1982, the landfill received approximately 29,000 tons of solid, liquid, and containerized hazardous waste.
2-6, 29-	At the onset of this disposal activity in 1971, it was generally not required by permit nor was it within the state of the art to place a liner or leachate collector below the waste. Such was the case at the Simi Valley Landfill, where it has been reported that neither a liner nor a leachate collector were installed beneath the Class I area.
2-7, 2-24	2.3 Existing Landfill Design and Operation 2.3.2 Daily and Intermediate Cover: 2.3.4 Waste Delivery and Processing: Appendix B, Air Quality Table B-1 PP-2; Table 2.3-1
	Page 1

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2-9, 21-25	Non-native, non-invasive species (such as barley) can be used for short-term erosion control on temporarily exposed slopes.
2-10 - 2-15	Leachate Liners etc
2-15,	Table 2.3-1 Average Tons per Day of MSW and Recyclables Received at SVLRC
2-15, 24-25	The majority of the MSW is received in packer trucks. Packer trucks hold eight to 10 tons of waste.
	Dage 15

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2-41, 2-6	Surplus excavated soils would be stockpiled on or near the active landfill face for later use as cover. In addition, a varying amount of cover material would be surplus dirt delivered to the landfill by contractors from local construction projects. With these available sources of soil , no need is anticipated for additional soil to be imported from outside the site.
2-16,	Recyclable Material
2-17, 8-13	In current operations, approximately 16.3 million gallons of potable water and 11 million gallons of reclaimed water are supplied to the SVLRC by CMWD annually. Approximately 4 million gallons of potable water is supplied to the off-site GI Rubbish hauling facility annually by CMWD this water use would be discontinued at the current GI Rubbish location.
2-17, 29-30	This excess landfill gas is incinerated in an on-site flare.
2-17,33	LFG typically contain 30 to 60 percent methane (by volume), up to 45 percent carbon dioxide,
2-18, 14	and a 10,000 gallon wastewater storage tank
2-19, 8	as well as to produce excess electricity that can be sold to electricity suppliers for off-site use.

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2-19, 24-30	The SVLRC is required to comply with a variety of plans and programs to reduce the impacts of operation on the both the work area and surrounding area as conditions of CUP-3142- 7. Programs include, but are not limited to a: groundwater and leachate monitoring program; gas emissions control and monitoring program; wind monitoring program; noise abatement program; visual impact mitigation program; fire protection program; seismic design; clay and cover availability study; site sign program; noise abatement plan; hazardous waste exclusion program; radioactive waste exclusion program; emergency procedures program; on-site drainage control plan; and stockpile plans. Several to these programs are outlined belowOdors Litter Dust VectorsVisual
2-18, 38	The Odor Control Plan also identifies steps to be taken to mitigate odors in the event of a compliant.
2-18-19, 42-2	An odor control product mixed with water is emitted from nozzles when warranted by landfill operations and wind conditions. The Material Safety Data Sheet (MSDS) for this product is provided in Appendix A.

Page/Lines	DEIR
2-19, 7	Litterperiodic inspection and cleanup of site and surrounding area to ensure the ongoing cleanup program is effective in collecting any litter that may have escaped;
2-19, 11-12	A Dust Suppression Plan (DSP) was approved by the Planning Division in 2003. The Plan contains descriptions of procedures used to minimize dust generation including
2-19, 25	SVLRC also uses treated leachate for dust suppression
2-19, 33-34	Vector Control Programperiodic inspections are conducted to determine levels of various vectors.
2-19, 36-37	In addition, nuisance birds are controlled by a variety of noise-making devices and other harassment methods including falcons and owls whose presence discourages other birds.

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2-10, 1-6	Visual. A Visual Impact Mitigation Program was approved in May 2003. The Plan provides a description of how the landfill operations will be effectively screened from the view as seen from SR-118 and surrounding properties.
2-21, 30-31	Environmental Monitoring. The SVLRC is subject to various state and local regulations pertaining to environmental monitoring at the site. Specific monitoring requirements include water quality, landfill gas migration and air quality.
2-21, 33-35	Site Closure
2-21,	Final Grade15 foot wide benches every 50 vertical feetfinal cover elevation is proposed to be 1,118 feet above msl.
2-21, 13	Final Cover Two feet of appropriate materials compacted to the maximum density obtainable at optimum moisture content in accordance with accepted civil engineering practice.
2-21, 27	average Ventura County waste represented 1,276 tons per day out of average total receipts of 3,681 tons per day.

Page/Lines	DEIR
2-23, 30	The closed landfill site will provide 235 acres of open space.
2-24, 2-63	2.4 Proposed Project - SLVRC Expansion Project
2-24,	Table 2.4-1 Comparison of Existing and Proposed Landfill Expansion Project
2-26, 12-21	Under the proposed project the permitted fill elevation would increase from 1,118 feet above msl to approximately 1,270 feet above msl, for a net increase of 152 feet. The proposed project would leave the existing natural ridgelines intact from most viewpoints and blend the proposed elevation of the landfill with the adjacent hilltops and ridges, which vary from approximately 1,000 to 1,350 feet above msl.
2-26, 27-29	SVLRC from its currently permitted 43.5 million cubic yards (cy) of air space and 34.8 million tons of waste, to 130.2 million cy of airspace (an increase of 86.7 million cy) and 104.2 million tons of waste (an increase of 69.4 million tons).
2-26, 34-37	Assuming the additional disposal tonnage is delivered exclusively by transfer trucks averaging 20 tons apiece, there would be an increase of 150 deliveries per day if the full 6,000 tpd of disposal tonnage is received.
2-28,	The SVLRC has not generally received as much MSW and recyclable material as it is permitted to receive. Table 2.4-4 Summary of Current and Proposed Permit Limits for Materials Received at SVLRC. Baseline condition 2,521 tons per day disposals. Currently permitted 9,250 tons per day, baseline condition 3,444 tons per day.
2-29, 7-8	Based upon actual or baseline receipts (2,521 tpd) it is anticipated that the landfill would reach its currently permitted capacity in 2028 (based on disposal 6 days per week, 312 days per year).

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2-29, 32	The facilities area would include a MRF/RTF to enhance recycling capabilities for the community.
2-29,	front end processing of up to 500 tpd of source separated recyclables and/or the transfer of recyclables could be immediately reloaded into transfer vehicles without on-site processing
2-32, 2-3	The existing entrance road would be expanded to accommodate three in-bound queue lanes and one bypass land within the gates of the SVLRC.
2-32, 7-22	C&D Debris Recycling. This area would migrate within the waste disposal footprint. Residual material meeting the definition of C&D ADC would be ground for use on the active face. Green Waste. Most of the processed materials would be removed off-site after chipping. The material that remains on-site would be used for mulch and/or ADC. No composting is proposed as part of this operation.
2-32, 23-34	Expanded Landfill Gas to Energy (LFGTE) Operations. Electricity generated from these additional systems would be used internally to power new and expanded buildings and facilities with the excess sold to the local utility grid and/or support a LFGTLNG facility at the SVLRC.

Page/Lines	DEIR
2-39, 2-28	Landfill Gas to Liquefied Natural Gas Facility. The facility would produce up to 13,000 gallons of LNG per day. Landfill gas typically contains 30-60 percent methane up to 45 percent carbon dioxide as well as nitrogen, oxygen, water vapor,commercially marketable product (dry ice), which would be exported off-site. Not more than approximately six truckloads per day would export there by-products off-site. The remainder of the LNG would be exported by tanker truck (typically 10,000 gallon capacity trucks) for use off-site.
2-39	Cover Slopes
2-41.	Stockpiling of Soil for Cover Material
2-43.	Water Supply
2-43.	Construction. The C&D debris recycling activities and green
	waste processing operations would occur on the landfill footprint in an areas not receiving waste and would migrate from place to place within the landfill
2-49, 6-43	Waste Quantities and Truck Traffic. Average traffic counts during first quarter 2008. Based on the above projection methodology, future daily trips related solely to landfill operations (that is, not to commuter trips) were calculated to be 1,173 trips per day. This is larger than the 892 trucks per day projected in Waste Management's application for the proposed project and, therefore, considerable more conservative.
2-50,	Table 2.4-13 SVLRC Permitted, baseline and Proposed Vehicle Trips. 1,010 maximum daily round trips net vehicle trip increase from baseline vehicle round trips.
2-52, 2-63	Measures to Minimize Environmental Impacts Table 2.5-1
	S ENVIRONMENTAL SETTING AND IMPACT ANALYSIS

Page/Lines	DEIR
3.1-1-3,	Regulatory Setting. Ventura County General Plan
3.2-13	Greenhouse gas emissions. Table 3.2-4 Annual GHG Emissions for Operation of the Existing SVLRC - CEQA Baseline Period of 2009-2034

Page/Lines	DEIR
3.2-29, 8-9	Proposed building construction would meet at a minimum Silver Level certification under the LEED Green Building Rating System, developed by the U.S. Green Building Council.
	This section to be reviewed
	5 ALTERNATIVES
5-12, 26-29	implementing a wasteshed boundary is therefore not without numerous potential political and economic difficulties. Based on the court cases and other issues discussed above, as well as the potential for political conflict and economic constraints, a wasteshed boundary imposed on the SVLRC by Ventura County is considered infeasible and is not analyzed further in the EIR.
AP K(page 8)	<b>Appendix K Waste Capacity Study</b> - Under its conditional use permit limits, the Toland Landfill may accept waste only from the residents of the Santa Clara Valley and commercial loads having been processed through a Ventura County transfer station or materials recycling facility.

Page/Lines	DEIR
5-4	5.3.3 Alternate Landfill Technologies
5-7,	5.3.3.2.2. Thermochemical Conversion
5-10,	5.3.4.2 Change California Policies to Increase Diversion and Require More Recycling

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5-56,	5.5.5.1 Impacts of Alternative 5: No Project Alternative
	9. REFERENCES
	APPENDICES
	APPENDIX B-1 EMISSION CALCULATIONS
Page147-148	Table B-1-B-6c Proposed Project Total Greenhouse Gases Generated from Landfill Gas: CO2e Emissions (Metric Tons). 2009 - 169,043.84 metric tons. 2020 - 192,288.75 metric tons.
	APPENDIX K - WASTE CAPACITY STUDY

Page/Lines	DEIR			
Page 1	The proposed project would expand the waste capacity of the SVLRC to 98.5 million tons, an increase of 63.7 million tons above current permitted levels. Approximately 31 percent of waste accepted [SVLRC] in the first quarter of 2008 originated outside the County.			
	on a factor related to projected population growth using the current distribution of sources that deliver waste to the facility (first quarter 2008 baseline data). It is important to recognize that projections far into future years are subject to a great deal of uncertainty.			
Page 3	In areas, such as eastern Ventura county, with a large waste generating population nearby, there is reason to believe that imposing a wasteshed boundary would prolong the life of a landfill while at the same time curtailing the economic rewards of operating the facility.			
	Restricting waste received to only Ventura Countythat scenario was deemed too speculative to provide useful information and therefore is not reported here.			
Page 7	Waste generation is a function of population, employment, business activity and consumer spending. More people plus an increase in better paying jobs leads to growth in the purchase of goods and ultimately waste generation.			
Page 7	In Ventura County, total waste requiring disposal peaked in 2005.			
Page 7	Table 1. Disposal and Alternative Daily Cover in Ventura County			



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# SVLETF Comments How were the proposed recyclable round trips calculated if the current recyclables approved at 6,250 tpd generates 292 roundtrips and the proposed expansion with a reduced recyclables capacity of 3,250 is projected to generate 345 round trips? Less recyclables and more trips? The projected daily trips per day of 1,297 is a 61% increase above the permitted limit and is a tremendous impact on the local area and air quality. Define "from the local community" Which is correct, 123 million cubic yards or 130.2 million cubic yards at capacity? The differential between the proposed project and the existing project is 152 vertical feet or the height of a 15 story building over the proposed 371 acre landfill area. Specifics to be in the referenced letter need to be disclosed to ascertain water source and supply impacts. The CMWD Urban Water Management Plan (2005) does not include the court ordered protection of the Delta environment and reduced long-term draws on this water supply. The 2005 UWMP is required to updated every 5 years therefore, this document is inadequate as a reference of water source and supply. Provide a full description of "baseline condition." More waste will placed into an expanded area, not just into the landfill. This increases risks to the groundwater.

As stated, the existing landfill operations contribute to water pollutants and the proposed landfill operations will co-mingle more pollutants in an amount not known or reported therefore the impact is significant and a toe-barrier will not mitigate these unquantified pollutant discharges. How is the current situation being addressed as this is a great community concern?

Filling a tributary and substantially changing the drainage performance is a significant impact to the environment and with unknown long-term impacts. The project expansion does not support this significant impact.

This statement speaks for itself and is reason for not approving the project.

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Define severe. This statement speaks for itself and is reason for not approving the project.

This statement speaks for itself and is reason for not approving the project.

Water pressure is not the only determinant in fire suppression by local water supply. This is an inadequate response to a potentially perilous, and all to frequent, occurrence.

Cite relevant codes, etc. How does the public know the relevancy and environmental impact if they are not cited?

Sentence missing subject.

This is a substantial impact on air quality and traffic. As the inbound trips have one destination , the landfill, what is the queuing in distance projected for these peak hour transfer and packer trucks on the freeway and coming into the site? The queuing and slow approach to the landfill on the freeway will slow down traffic on the freeway and add to overall air quality impacts.

This statement speaks for itself and is reason for not approving the project.

Relies on an incomplete project in the process of environmental review and without known funding as a mitigation measure.

Refer to comment on water supply and sources. The state mandate to reduce per capita water consumption 20% by 2020 will put greater pressure on existing water sources and reclaimed water for other projects throughout the service area, including using reclaimed water for large community benefit projects such as for parks. Information on supply and source from the water purveyors needs to be provided to access the project impacts on water.

In reference to waste treatment/disposal the comments reflect expectations that exception conditions to the Ventura County Sewer Policy WOULD be met, however an expectation is not a reasonable basis without sufficient evidence supporting the claim, especially if this is a discretionary entitlement. No information is provided in this section about the exception condition process.

Why isn't it known if the Board is likely to take jurisdiction over permitting? Why isn't there an affirmative statement and clarity as to the authority on the permit issuance?

When was the study performed and what is the name of the study? Is the study provided in the Appendices and if so cite.

From 2009 to 2060 is a period of 51 years, not an insignificant amount of time or supporting a sense of urgency in the need for additional landfill capacity in the County at this time.

This statement speaks for itself and is reason for not approving the project.

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Explain why the EPA WARM model was not selected for the DEIR greenhouse gas emissions calculations. The EPA created the WAste Reduction Model (WARM) to help solid waste planners and organizations track and voluntarily report greenhouse gas emissions reductions from several different waste management practices. WARM is available both as a Web-based calculator and as a Microsoft Excel spreadsheet (317K WinZip archive).WARM calculates and totals GHG emissions of baseline and alternative waste management practices—source reduction, recycling, combustion, composting, and landfilling. The model calculates emissions in metric tons of carbon equivalent (MTCE), metric tons of carbon dioxide equivalent (MTCO2E), and energy units (million BTU) across a wide range of material types commonly found in municipal solid waste (MSW).

Explain why the Climate Action Reserve Landfill Project Protocol was not used for calculations of the project landfill gas capture and destruction technologies. The protocol is designed to ensure the complete, consistent, transparent, accurate and conservative quantification of GHG emission reductions associated with a landfill project. Is this project controlled under other regulations. Projects registered with the CAR receive annual independent verification by ISO accredited and Reserve approved bodies. Guidance for verification bodies to verity reductions is provided in the Verification Program manual verification by a third party isn't a mitigation measure for the methane that is captured on site.

This statement speaks for itself and is reason for not approving the project.

Is "cumulatively considerable" equivalent or more severe than "significant" under CEQA?

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The relationship between this statement and the statement on page ES-17 that enough water pressure exists for fire fighting purposes needs to be resolved. In addition, for fire suppression purposes, there is a difference between volume of water capable of being supplied in a pipe versus the pressure needed to deliver the volume of water. The regional shortage is critical as Simi Valley has repeatedly been surrounded by fires along the urban interface perimeter.

This statement speaks for itself and is reason for not approving the project.

The fee has not been determined, therefore the mitigation of the impact is speculative. There are too many undetermined factors and lack of specifics associated with this mitigation measure. "Vicinity" is not described nor mapped.

How does lengthening the construction period during smoke period decrease the daily AQ impacts? How are the impacts measured, where are the measuring devices to be located, and what is the measuring frequency to determine the efficacy of this mitigation measure? Minimizing idling time is not specific as to maximum idling time and there is no enforcement or compliance provision for this weak and ineffectual mitigation measure. Furthermore, the air quality impact and greenhouse gas calculations use five minutes for idling. This should be increased to 10 minutes if idling limitations of five minutes are not enforceable. "Encourage" is not a statement for which compliance or mitigation can be assured. The specific types of construction equipment should be listed. The list should be approved by the mitigation monitoring authority before work commences.

"Which is assumed" is not a definitive statement assuring the dust mitigation rule is adequate or enforceable.

Instead of stating "where feasible" provide an equipment inventory and identify engines where conversion is not-feasible then access the environmental impact.

Define and specify "rigorous watering" for determining adequacy in mitigating impact and what is the water quantity to be used on a daily basis to mitigate this impact. The quantity of water for dust abatement in Simi Valley, an area prone and known for the frequency of high winds must be quantified and included in the water resources section . Specify "other" in terms of control measures.

It is incumbent upon the County to explain the lack of initiative in establishing a TDM program countywide. There is no specificity to what constitutes an Emissions Reduction Plan to ensure it is adequate in mitigating this significant impact. There is no value in asking for funds to "buy your mitigation measure" in the absence of specific measurable and enforceable requirements that mitigate the significant impact.

"Some other legally enforceable" is still a "buy your mitigation measure" proposal and is weak in substantive value. Any funds or fees collected should be used exclusively in Simi Valley to offset the air quality impacts to residents and community members breathing the fouled air.

The statements are woefully inadequate in providing the public with assurance the significant impact will be mitigated to a level of less than significant. The public needs certainty not uncertainty. Why aren't the specific mitigation projects known at this time? When would they be known? How was the leap-of-faith assumption that reduction programs are effective made, on what basis, and by whom? Is it reasonable to assume the average person would come to the same conclusion?

Why isn't an update of the plan being performed now and part of this DEIR. Certainly, the substantial expansion proposed qualifies as the "deemed necessary" justification.

The response references AQ-3 which does not address climate change gases other than Nox and only in relationship to on-site off-road mobile equipment. The Task Force requests that the State Attorney General's Office, the Environmental Protection Agency, the California Air Resources Board and the California Integrated Waste Management Board provide review and responses related to the project's contribution to climate change, greenhouse gas emissions inventory and reduction measures. The mitigation measure does not provide sufficient information to determine adequacy

of "armored sufficiently."

"Would", "whether" and "should" are not definitive statements ensuring mitigation <u>will</u> result in a less than significant environmental impact.

Define "other property" and parameters to determine adequacy of mitigation measure. How will "in perpetuity" be assured? What site protection measures will be stipulated? Define and map "vicinity." The expansion is directly adjacent to Alamos Canyon. What is meant by "shall be avoided" as it is not a clear statement nor an enforceable statement assuring the mitigation measure is adequate. Is the county aware of the project applicant's current use of falconers? How can falcons be controlled in the air space?

Provide map and three dimensional space defining protection area "in and adjacent to" Alamos Canyon.

Why is this mitigation open ended by stating "three or more?" Why isn't more project information provided to better ascertain technical feasibility?

"Collaboration should be done" tells the public what? What local groups is the measure referring to? Could the applicant set up their own "local group?"

What agency determines update and when? What is the criteria for determining "as necessary"?

Define and adequately describe portable wind fences. What is the aesthetic impact of these fences?

This is a significant impact for which no mitigation is proposed. The loss of agricultural soils in the densely populated southern California locale, impacts future food security. By decreasing available agricultural lands near population centers, more food must be transported from areas further away and this impacts air quality and increases greenhouse gas emissions.

This statement speaks for itself. The impact on Simi Valley's beloved viewshed will forever be marred by the proposed mountain of trash into perpetuity.

This significant impact is mitigated by the mere suggestion of following a guideline. How the scenic impact is mitigated is not described nor is the landscape plan goals expressly stated. How do the guidelines relate to or support the Revegetation Plan requirements?

A photometric study should be required to determine lighting impacts on nocturnal wildlife.

When will this be submitted? What are the mitigation measure requirement for this significant impact? How will the impacts be lessened? Is the current plan inadequate an if so explain and provide details.

Provide a map of the area to be avoided.

Explain in specific terms why the impact on water supply is less than significant and why mitigation measures are necessary when page ES-11 states a water availability letter would be submitted by CMWD with the proposed project application, verifying that adequate water supplies are available.

How does paying a fee mitigate the impact? Although this may be common practice, the benefit of this practice to this specific project and impact on local parks/facilities is not described to the point mitigation can be assured.

No supportable "need" for the project is substantiated in section 1.2.

WM is a business and recycling is not an engagement for WM but a business component."Engages" oversimplifies the impact of the combined business expansion proposal. The 2007 estimated annual revenue of the U.S. recycling industry was \$236 billion. Recycling rates in the United States have doubled since 1992. Reducing the recycling component of the landfill operations from 6,250 tpd to 3,250 tpd does not address the significant benefits of recycling. It limits the capacity of the landfill to meet the next generation of waste diversion and that is the growing recylables market spurred by increased diversion requirements. The CIWMB states "the environmental impacts of recycling are astounding. Each year recycling saves enough energy to power 1.4 million California homes and recuces water pollution by 27,047 tons. Furthermore, each year recycling saves 14 million trees and helps to reduce air polution by 165,142 tones. All of these efforts are working to reduce greenhouse gas emissions by an amount equal to taking 3.8 million passenger cars off the highway."

The same beneficial impacts of recycling stated by CIWMB should be stated in this DEIR.

It shall be noted that the DEIR did not define "long-term" in years for this statement. As has been previously stated, the waste management capability of the county is not in jeopardy with the county having 21 years of capacity remaining which should be considered "long-term."

The DEIR acknowledges that Los Angeles County is a "major customer" of the SVLRC. Projected population increases in and of themselves do not constitute a direct or implied need for landfill expansion. On the contrary, waste reduction laws, regulations, and public education control waste to landfill. Residential disposal in California has gone from 3.12 pounds per resident per day in 1990 to 2.49 pounds per resident per day in 2006.

"Adequately serve the areas beyond 2050" is a nebulous phrase as there is no reference to what constitutes "adequately" and secondly, "beyond 2050," is an indefinite horizon. Supposedly inserted to support the need for the proposed expansion, these statements fail to meet this objective. Furthermore, no calculations are provided to demonstrate that the county, the region or the state is not going to meet projected diversion targets, and more importantly, that if the trend for diversion increases, the expansion need would be less.

As has been stated, the project objectives do not provide a basis for supporting that the particular solution (proposed landfill expansion) is necessary at this time, in the next five years, in the next decade, or in the next 15 years.

The requirements of the SWFP need to be provided and described in the DEIR to ascertain the bearing of the permit and the local agency's enforcement power on environmental protection. The timing and sequencing of the permit in relationship to the EIR and CUP needs to be provided as well to ensure mitigation is meaningful and that the enforcement provisions are in existence prior to expansion operations commencing.

What are these permits? What are the requirements for these permits? Do these permits have a bearing on the project's environmental impact? Are these separate permits or sequential? Do these permits have a bearing on the "major" permits? For purposes of the DEIR what differentiates a "major" permit from any other type of permit?

It is not full disclosure nor in the public's best interest to solicit comments an a project of this magnitude and regional significance and to answer pointed questions raised by the public by refering to sections of the DEIR - not pages, not lines but entire sections. This requires the public to seek and interpret the question independent of an answer being provided by the paid DEIR professionals. As an example, Simi Valley Mayor Paul Miller asked a direct question (page 1-10), "What population will be served by the expansion?" The response given is "Chapter 2.0 Project Description." **CHAPTER 2 IS 64 PAGES IN LENGTH**. Other questions are answered with the ambiguous phrase "Comment Noted." What good is this to the public? This is no answer but an evasive tactic that may be in violation of state law. The County needs to provide a direct answer to every question asked by the public and without leaving the response open to intrepretation.

Until responses to the public comments have been addressed the Task Force does not have the information necessary to comment in detail on whether the comments/questions raised by the public have been sufficiently answered or that the responses are adequate.

There are 11 parcels associated with the project. In the unlikely event that the County should approve this unnecessary expansion request, a condition of approval should be required to consolidate all of these parcels into one parcel in compliance with the Subdivision Map Act and to ensure no parcels are segmented or sold off at a future date to the detriment of the environment; to ensure buffer areas remain intact; and to ensure mitigation measures such as habitat protection are not compromised nor diminished. The lot consolidations are also necessary to clearly define the landfill capacity consistent with the Ventura County Integrated Waste Management Plan Countywide Siting Element, 1995.

This material lies at unknown locations, but under more recently deposited trash, and without a leachate impervious liner. DEIR does not address geologic instability and oil/gas migration effects on the toxic waste.

This is expressly why a hasty rush to approve the unnecessary expansion at this time may prove to be of a significant detriment to the environment and the health of residents in the community in years to come. Lessens of the past should be lessens for the future. It is not known what the past practices of unprotected hazardous waste landfill may have when combined with future waste collection over and adjacent to the same landfill site.

Critical information on daily cover and Alternate Daily Cover (ADC) is missing and is not referenced. Analysis is not provided on the daily cover and ADC to determine the environmental impact of daily cover and ADC increases associated with the substantial landfill expansion. The ratio of landfill disposal waste, the daily tonnage, the volume of daily cover, and the ADC composition is not provided as part of the project description yet it is a critical operating practice required by the state and should be evaluated for environmental impacts. The reader must dig deep to understand the operational aspects of ADC employed and proposed at the landfill. In Section 2.3.5 Waste Delivery and Processing, waste is divided into two categories 1) Municipal Solid Waste and 2) Recyclables. What is not expressly provided is the amount of "recyclables" permanently landfilled as ADC. In the *Appendix B Air Quality Table B-1PP-2 Baseline Estimated Trash Volumes & Daily Cover Needs by Year*, maximum daily cover in tons/day (1,466) is provided, yet the amount of recyclables is not provided as a column of information.

The public must extrapolate from multiple DEIR sections and appendices to try to figure out how much of the allowable ADC can be derived from "recyclables" thus permanently landfilled. Using the maximum ADC of 1,466 tons/day (to increase to 2,931 for the proposed expansion) and subtracting the recyclables that can be used for ADC from Table 2.3-1 (1,070) it is inferred that 100% of the recyclables collected can be used for ADC. In essence no recyclables need to be recycled off-site because WM needs the material to meet the state requirement for ADC. The DEIR is seriously negligent in not fully explaining and evaluating the environmental impacts of the total materials (solid waste and recyclables) permanently landfilled and leaves the false impression that recyclables are reused off-site. The proposed project ADC requirement is listed as 2,931 (a 200% increase over existing) yet it is not known where the increased ADC will come from as this is not fully described and the expansion proposal seeks to decrease recyclables to 3,000 tons per day from 6,000.

Coincidentally, the proposed tonnage of recyclables (3,000) nearly matches the maximum ADC (2,931) for the expansion. In *Table 2.4-4 Summary of Current and Proposed Permit Limits for Materials Received at SVLRC*, no data on daily cover or ADC is provided. In the project description the DEIR hides behind daily cover, alternate daily cover and recyclables in an effort to avoid disclosure of the true environmental impacts of the project ADC. It appears that the construction and demolition operations along with the green waste collection amount to practices supporting the landfill ADC requirements. (See also greenhouse gas emissions comments associated with landfilled compostable materials.)

For purposes of determining the base amount of solid waste from which the diversion requirements of this article shall be calculated, "solid waste" does not include the diversion of agricultural wastes; inert solids, including inert solids used for structural fill; discarded, white-coated, major appliances; and scrap metals. In other words, the diversion rate of 50% is a misnomer in that separated green waste, C&D waste, etc., can be placed in a landfill and not counted as solid waste.

CIWMB strategic directives call for halving the amount of organics sent to the landfill by 2020. This goal may have an impact on the source for the Simi Valley Landfill ADC and this needs to be addressed in the EIR.

What is the definition of "short term?" Has the short term non-native species used for cover been evaluated for its environmental impacts in relationship to local native species and for water impacts? For example, barley may require 6-8 inches of water or more to germinate and grow. Has this water usage been specifically calculated?

According to published studies, HDPE landfill liners have been shown to contain numerous leaks over unit area resulting primarily from construction defects. Pressure, vacuum and spark testing are available testing methods, however DEIR has failed to adequately evaluate risk associated with conflagration resulting from spark testing of membrane seams.

What is the time period for which the "average" was calculated? (See also comments under 2-9, Daily Cover)

How much is a "majority" in this reference (51%, 99%)? The percentage closer to actual should be included in the description as the information should be known. In other sections page 2-26) of the DEIR transfer trucks are listed as the primary trucks and they are stated as having a capacity of averaging 20 tons apiece. The DEIR needs to resolve the difference and use of terms "packer trucks" and "transfer trucks" and their associated tonnage as this is a significant traffic impact.

What is missing from this description is that 1) ADC can be used for daily cover in lieu of soil, 2) that the soil brought in from contractors used for daily cover is not considered "waste" and is not factored into the waste received daily but as "recyclables", 3) there is no mandatory requirements that the stockpiled soil must be used for daily cover before any outside materials are used, and 4) there is no reference to or analysis of the time limit, cubic yard limitations, height limitations, aesthetic impacts or other requirements/descriptions for "stockpiled" soil.

In each description of the recyclable material categories, the average amount used for ADC average in tons per day should be provided.

What quantity of water will be required at the SVLRC to continue the GI Rubbish location operations which currently use 4 million gallons of water annually? Just because it is stated that the water will no longer be needed at the GI's current site by GI does not mean a new use will not have a 4 million gallon water need nor that the relocated use will not need 4 million gallons or more. In the water impact section, it is unclear if the 4 million gallons of water at the current GI Rubbish site was subtracted from the water purveyors supply needs or left in for a future probable and similar use. Both sites are served by the same water purveyor, CMWD, so the net additional water use would be 1) GI transfer of 4 million plus 2) the existing landfill water needs, plus 3) the expanded landfill project water needs.

Irrespective of the landfill expansion request, the County should require that the current excess landfill gas be put to a beneficial use not for atmospheric exhaust.

Carbon dioxide emission are know to effect global climate change and will be subjected to more rigorous emission controls in the near future. The DEIR has failed to adequately address the leakage of carbon dioxide, or in the alternative, the risks associated with its conversion to "dry ice".

What is the collected wastewater used for? How is it disposed of if there is no connection to the municipal sewer system? Is this water used as part of the landfill operations? How long does it take to fill the 10,000 gallon tank? Does tank storage need to be expanded to meet the needs of the landfill expansion? If yes, how much? If the water is used on-site was this included in the project water needs assessment and subtracted from the imported water needs?

Is this excess electricity sold to electricity suppliers? "Can be" does not describe the current LNG produced and its actual use. How much electricity is produced and how much will be produced with the expansion? Is this an ancillary business to the landfill operations?

No narrative Is provided as to the effectiveness of these programs in mitigated the associated impacts or achieving program goals. The programs outlined (odors, litter, dust, vector, visual) are not specified in the previous listing. The relationship between these two sets of lists needs to provided. Why aren't all programs listed instead of using the "but are not limited to" phrase? The full description of environmental control measures needs to be provided.

What are the steps for mitigating complaints? How effective are these steps? How are complaints filed and received? Has the complaint process been reviewed by at third party to ensure effectiveness? With the tripling of the landfill, increased opportunities for odor complaints may arise in which case the public should have the necessary information in the DEIR to evaluate the effectiveness of past and future measures for submitting, receiving, and addressing complaints.

The MSDS provided is dated 1998. Is there a more recent MSDS than one **11 years old** for this product? Aren't MSDS required to be updated and available on the site? If so, is this project in compliance with this requirement? Has this been the sole product used for odor control in the past nine years? Does the DEIR include an analysis of the environmental impacts of this odor control substance? What are the associated health risks of this substance? Are there any stated requirements or conditions of approval for monitoring and approving the product selection? Is there a generic odor control substance description as opposed to a product? What safer products have been evaluated in lieu of the product Odor Armor that may have more information provided on its MSDS as to the health risks and exposure? Has this been explored? If so what are the results?

The MSDS (material data safety sheets) for this product, Odor Armor, found in Appendix A, states that there are "not established" criteria for OSHA and other categories; that the respiratory tract sensitization is listed as "no data available'; that teratogenicity reproduction effects are listed as "no data available'; and that mutagenicity is listed as "no data available". What is the definition of "when warranted"? Is this described in the Odor Control Plan? If so, it should be provided in the DEIR. Are there other products, chemicals and or compounds on the landfill site that require MSDS sheets? If so, are they provided as part of the DEIR?

Has this litter control program been evaluated by an independent third party for compliance and effectiveness "to ensure the ongoing cleanup program is effective in collecting any litter that may have escaped" for environmental impact mitigation? Define "periodic" and is this a reasonable time period for litter cleanup? Define parameters or

Has this six-year-old DSP been evaluated by an independent third party for compliance and effectiveness for environmental impact dust mitigation?

Is this described and analyzed as a health risk?

Has this VCP been evaluated by an independent third party for compliance and effectiveness to ensure that it controls vectors as an environmental impact mitigation? Define "periodic inspections" and is this a reasonable time period for control? How are levels of various vectors determined and what constitutes an unacceptable level? Is this assessment accompanied by a report submitted to the county?

Has an assessment been done to determine if these harassment methods have a negative impact on native birds?

If in 2003 it was deemed by the County to effectively screen the landfill from the view as seen from the SR-118 and surrounding properties, the same should hold for the proposed expansion. The rationale and environmental consequences for imposing this conditions and VIMP requirement must stand today as they did in 2003. Where is the analysis of the effectiveness of the 2003 VIMP? Waste Management staff, at public meetings, has stated that a purpose of the landfill expansion is to preserve the view from SR-118 near the current SVLRC entrance. Is this a necessary objective if there is an effective existing VIMP?

The impact and effectiveness of these "various" regulations cannot be ascertain if the list is incomplete. This should be known information disclosed in the DEIR.

What is the anticipated use of the project site after closure? Plans for the current, and proposed 887 site after operations seize in 2050 should be disclosed? What has been the post-closure use for other landfills with similar conditions? The community needs to know what the probable uses of this site is after closure. If to is too far into the future than the expansion should not be extended to such a distant year decades from now.

There is no discussion of contour grading replicating natural land forms at final grade and project closure for the current nor for the proposed project expansion. This should be mandated by the county. The significant visual impact of this project cannot go unaddressed by relying on business-as-usual manufacture red and engineered slopes of artificial proportions, grades and contours. 15-feet benches every 50 vertical feet are visual blights upon the land. This text-book engineering solution is not the legacy we should leave future generations.

What constitutes "appropriate materials"? Shredded tires, construction waste? If yes, how will vegetation grow on these mediums? Some vegetation absorbs lead and other metals from the soil. Wildlife then eats the vegetation and can suffer health impacts. Has this been addressed in the DEIR?

This phrase does not define the "waste" per previous descriptions and tables. Is this municipal solid waste, recyclable waste, or the total solid waste? Using these figures, out-of-county waste constitutes 65% of the "waste" received by the landfill in 2008. This percentage will dramatically rise with the Ventura County quantities remaining constant and the amount of solid waste increased per the proposal to 6,000 tons from 3,000.

What is the final disposition of the 235 acres of open space? Who will own it? Will this require a zone change? Can this be future waste areas per the Ventura County Integrated Waste Management Plan Countywide Siting Element, 1995? What prevents this acreage from becoming waste/landfill space in the future?

Most of the comments under Section 2.3 Existing Landfill Design and Operation apply to Section 2.4

The elevation limit for the proposed expansion is given as 1,270 +/- 5 feet. This is not a "limit" but a range and the CUP must establish an actual limit, not give or take 5 vertical feet (multiplied by the area, 5 feet is a sizable difference in volume and environmental impacts).

As stated above, "approximately" is not a limit but a range. The DEIR needs to be definitive on the vertical limit in elevation of the proposed expansion. The "blending" concept needs to be fully explained to understand the impact and it is not clearly explained as to what "adjacent hilltops and ridges" are referenced here. An aerial photo with contours and ridgelines shown should be required to illustrate this concept.

These calculations to the decimal point support the need for stated height limits, not approximations. As previously noted, the sizable expansion request has not been proven to be necessary at this time.

What is the impact on local roads and highways for these additional heavy weight (20 tons each) deliveries. This concentrated weight and frequency will certainly shorten the life of these roads at a cost to the tax payer.

Yet again, the facts speak for themselves in why an expansion is not necessary at this time. The existing permitted landfill is not receiving its permitted capacity, but only 37% (3,444/9250 tons). The table does not provide tonnage of recyclables diverted off-site. Theoretically, the recyclables exported would reduce the baseline daily tonnage, so the daily variance in permitted tonnage and tonnage actually landfilled permanently on site may be greater.

Another reason why the proposed expansion is not necessary at this time. (See also comments on Appendix K - Waste Capacity Study)

The proposal seeks to decrease recyclables permitted from 6,250 tons per day to 3,250 tons per day, a difference of 3,000 tons per day so it is contradictory to state that the proposals seeks to enhance recycling capabilities. Additionally, "the community" is not defined so the DEIR does not provide enough information to ascertain the validity of this statement.

It is unclear as to the quantity of the 500 tpd is projected to be transferred for off-site reuse. This needs to be stated for all recyclables categories.

Explain expanded from what?

The very nature of the C&D operations to be sited at the active landfill cells underscores the lack of sincerity in recycilng and reusing C&D materials off-site for a better and higher use than a component of landfill operations. "Most of the processed materials" in regards to greenwaste needs to be defined. If this is indeed the business case, the county should ensure this by conditioning the project to remove off-site (and not to another landfill or temporary holding area, or for LNG usage) a stated majority in tonnage for greenwaste to be removed. Composting of greenwaste for a better use is preferred yet the project proposal includes no composting facilities in a geographic area rich in premium farmland. This should be a mitigation measure for the project proposals impacts on agricultural resources. According to the project site history (pge 2-5) an application for co-composting facility was submitted in 1995 but withdrawn. Composting has been considered in the past and should be considered as part of this expansion request.

How much energy is projected to be used at the expanded facilities? How much energy is projected to be excess? It is assumed but not stated in the DEIR that there is a market for the excess electricity. This needs to be made clear.

In order for a LNG plant to function, it requires the long-term burying of a large stream of organic and other carbonaceous wastes at the site. More garbage, more gas. The plant, like gas flares or their existing on-site generators, is in reality a mitigation measure to prevent methane and toxic gases produced by decaying waste from entering the atmosphere. Methane is 20 times worse than Co2 as a GHG precursor. This is why the CA Air Resources Board, through AB 32, is trying to implement measures to <u>divert</u> organics from landfills. This needs to be disclosed for the environemental impact and mitigation measure that it is. The dry ice production is a separate for-profit business as is the excess LNG trucked for sale off-site. How is this factored in the permitting process? What if there is no market for dry ice or LFG? How will the excess LFG be expended? As a gas flare on-site? Where is this discussed/disclosed in the DEIR? How safe is it to transport 10,000 gallons of LNG? Is this an increased risk to communities along SR-118?

See previous comment under natural contour and grading in section 2.3

See previous comments under section 2.3

See previous comments on water supplies and sources.

See previous comments on sincerity of C&D waste for reuse off-site.

Is it industry practice to only use traffic counts for one quarter in forecasting future trips for a project of this regional significance and scope?

Where in the table are LNG and dry ice transport listed? These products are not recyclables, not waste material, and not employee trips.

See previous comments under section 2.3 and 2.4 on effectiveness, etc., of plans, programs. Where in the DEIR are the plans and programs provided in their entirety for review? Vector Program and Hazardous Waste Inspection Program appear to be missing from the table. Permitted traffic volume of 822 round trips does not appear to be correct.

The SVLETF has not had an opportunity to review this section in its entirety.

No mention is made as to the project's compatibility with the Ventura County Integrated Waste Management Plan Countywide Siting Element, 1995 and associated maps including sensitive receptors.

The table should provide the CO2e in million metric tons not units of million metric tons. There is no shortage of space to include the actual figures in the table and it is misleading to the public to include a figure of 0.54 for total 2009 CO2e when the actual projection is 540,000 million metric tons. There is no summary comparing the Total Annual GHG Emissions for the existing project, to the proposed project, to alternate 2 project in the appendix nor in section 3. There is no Table in section 3 or the Appenidix with totals for the entire project ghg emissions (construction and operations) and comparing these totals with the existing project and alternative 2. The total greenhouse gas emssions from all sources is not summarized in section 3. There are 164 tables in the Appendix related to greenhouse gas emissions. There is no table with the Total Proposed Project Greenhouse Gas Emissions. There is no way for the public to know what the total projected greenhouse gas emssions are for the project.

Until this data is provided in in Section 3 and in tabular format in the appendices the SVLTF cannot provide thorough comments on the significant environmental impacts and health hazards associated with greenhouse gas emissions.

The LEED green building rating system is a flexible, points based sytem for evaluating project design, plans, specifications, construction, commissioning, and post-occupancy performance in five areas: 1) Sustainable Sites, 2) Energy, 3) Water, 4) Indoor Air Quality, and 5) Materials and Resources. There are NO credits expressly for greenhouse gas emission reductions although the USGBC is currently developing the means to address this gap by developing a 'common carbon metric' for those who are dedicated to promoting the understanding and development of a green, low-carbon and sustainable built environment. The metric is recognised by the UNEP Sustainable Building and Climate Initiative, and will be highlighted before decision-makers In December 2009. LEED review and verification can take up to nine months post occupancy to complete.

Therefore, making a statement that the proposed building "would meet" LEED Silver certification as a mitigation measure under Impact AQ-70: Global Climate Change, is misleading, especially in the absence of 1) specifying the LEED portfolio required (LEED NC, LEED CI, etc.),

The SVLETF has not had an opportunity to review this section.

The SVLETF has not had an opportunity to review this section in its entirety.

Explain why CEQA allows dismissal of alternatives based on "potential political and economic difficulties?" Isn't the purpose of CEQA to protect the environment and fully evaluate environmentally superior alternatives?

In direct contradiction to the above statement as to why limitations on waste from defined areas is politically and economically difficult (although not impossible) as well as citing Commerce Clauses, the Toland Landfill does have limitations as stipulated in its CUP.

The Toland landfill CUP 3141 Mod#3 dated May 22, 1996 states: "**Exclusive In-County Waste Acceptance.** This condition implements the voluntary limitation in the permittee/applicant's project description, dated 12/4/95 (Condition Attachment 2) as modified by the applicant during the (Board of Supervisors) public hearing regarding this permit, that Toland shall accept only waste (including green waste and other Class III refuse) generated in the County of Ventura except for existing (out-of-county) patrons of in-county processing facilities not to exceed 15 tons per day (County enforcement of this limitation shall be limited to verifying the origin of trucks only) as follows:"

This condition of approval for a Ventura County landfill is a precedent that negates the SVLRC DEIR's meritless assertion that wasteshed limitations are infeasible and proves that "potential political and economic difficulties" have been overcome in the past by the Ventura County Board of Supervisors. For this reason, and the fact that voluntary limitations are an accepted county practice, the wasteshed alternative is viable and must be included in the SVLRC EIR.

The DEIR does not evaluate off site, non-disposal alternatives such as biorefineries and the DEIR fails to evaluate or to note studies and projects supporting the environmental benefits of these alternative waste to energy technology.

The DEIR inaccurately characterized and assessed thermochemical conversion by limiting the discussion to plasma arc, gasification, and pyrolysis although many other waste conversion technologies are commercially available. The primary reason given for the lack of evaluation being economics yet no pro-formas are provided and no substantiated evidence is given as to the environmental benefits of these technologies over the lifetime of the project. If economics are to be used as a driving criteria for evaluating or not evaluating project alternatives then the entire spectrum of the true cost to the consumer, the community, the tax payer and the environment need to included as part of these evaluations. Local governments and rate payers are already relegated to bearing the inappropriate burdens of increasing costs and risks to manage end-of-life products and materials and waste. The DEIR is remiss in selectively and superficially using economics as an assessment tool.

The DEIR should acknowledge that currently before the California legislation are bills to raise the state landfill diversion mandate from 50% to 75%, to improve manufacturer's responsibility, and to reduce certain products (e.g., single-use plastic bags) from the waste stream. The DEIR should acknowledge that both Ventura County and the ten cities have the independent authority to set more stringent waste reduction and diversion goals within their respective jurisdictions.

The DEIR should acknowledge the waste reduction strategies described in the Southern California Association of Governments (SCAG) 2008 Regional Comprehensive Plan (RCP) Solid Waste Chapter which provides guidance to area communities in addressing the unsustainable practice of "mismanaging our natural resources by creating mountains of garbage and the associated health and environmental impacts that result."

The DEIR should evaluate the environmental benefits of every jurisdiction in the county adopting Zero Waste Strategic Plans as planning tools with implementation measures to aggressively reduce their associated waste-to-landfill streams. Zero Waste represents a fundamentally different approach that tackles the root causes of waste generation and broadens responsibility for the solutions. This is also associated with reducing greenhouse gas emissions as the waste sector is a major component of a jurisdiction's greenhouse gas inventory.

Suggested strategies to reduce waste generation in the County must include:1) each jurisdiction submitting a Zero Waste Strategic Plan for approval by the year 2012, 2) reevaluating the tipping fees and associated charges to encourage diversion, 3) supporting state legislation to increase diversion from 50% to 75% while placing restrictions on how Alternative Daily Cover is calculated and permitted, 4) make manufacturers more responsible for the cradle-to-grave product waste generation, 5) implement aggressive and innovative waste reduction programs such as public education, 6) approve bans on wasteful products such as single-use carryout bags and food containers made of Styrofoam,

7) promote and support energy recovery facilities at existing county landfills for both power and liquid fuel production as beneficial landfill gas mitigation alternatives, 8 )create partnerships with local renewable energy producers for government procurement of green power, and for the fueling of green municipal fleets, 9) support a statewide landfill surcharge to fund local programs and facilities, 10) ban yard waste from landfills.

The county should also promote, support and incentivize new or expanded material recovery, construction and demolition debris recovery and decomposting facilities both at landfills and at existing off-site locations with the caveat that the collected materials are re-introduced into the environment for beneficial reuse - not buried in a landfill for profitable operating practices. The county should commence active procurement processes for the siting and development of advanced waste conversion facilities as industrial parks or as eco-park land use alternatives. The county has an opportunity to create green jobs in excess to those singularly attributed to a standard business-as-usual landfill.

The County should evaluate the green job creation through reuse and recycling in comparison to the standard landfill operations. According to figures released by the Institute for Local Self-Reliance (ILSR), on a per-ton basis, pallet repair operations sustain 14 times more jobs than disposal facilities, electronics reuse enterprises sustain 68 times more jobs, multi-material reuse facilities sustain 38 times more jobs, and textile reuse businesses create 37 times the number of jobs as disposal facilities. Thus, the potential to create new jobs through reuse is enormous. ILSR estimates, for instance, that 110,000 new jobs could be created by reusing half of the 25.5 million tons of household durables now landfilled and incinerated. Another 25,000 jobs could be created if just half the textiles thrown away in 1994 are recovered.

This is the only preferred alternative considering the significant environmental consequences resulting from this premature and unnecessary expansion. As had been previously mentioned, the Ventura County decision makers need to flex their authority in assuring aggressive landfill waste diversion practices be proactively adopted by the county itself and jurisdictions within its boundaries.

Ventura Waterworks #8 Urban Water Management Plan of 2005 is not referenced. Ventura County Integrated Waste Management Plan Countywide Siting Element, 1995 is not referenced.

The SVLETF has not had an opportunity to review the appendices in their entirety.

The SVLETF has not had an opportunity to review this section in its entirety.

These projected emissions are significant but only include totals for landfill gas. The appendix does not appear to contain a table totaling all greenhouse gas emissions for the project (stationary, mobile, fugitive, operations and construction). Is the expansion request at this time seeking to avoid proposed EPA health hazard findings requiring federal permits for both new facilities and existing facilities undergoing major expansions which emit more than 25,000 tons of GHG annually? The EPA is prepared to use its authority under the Clean Air Act to reduce GHG emissions.

The SVLETF has not had an opportunity to review this section in its entirety.

By doubling the solid waste daily capacity from 3,000 tons to 6,000 tons, the SVLRC will increase its for-profit capacity for receiving trash outside of Ventura County from 31% to 65% using the 2008 quarterly results. Profit alone cannot be a reason for permitting an expansion at this time.

In forecasting future disposal rates the waste capacity study relies exclusively on one quarter of SVLRC landfill results. A waste capacity study of this magnitude should not rely on one quarter's data but should include an entire year and include normalized conditions using past trends. Within the DEIR the recent (past 12 months) economic downturn has been cited as a reason for less waste collected. This speaks to the need to have a normalized baseline.

The assumption that imposing a wasteshed boundary is directly related to curtailing economic rewards of operating a landfill facility is not proven. This rationale is unfounded speculation and based on economic rewards as opposed to environmental protection.

As has been previously stated and cited, the justification for not including a wasteshed analysis is meritless. While the DEIR, in compliance with CEQA, can cite "too speculative" as a reason for not pursuing an alternative it cannot be used as rationale in the absence of supporting data or documentation.

This statement is a misrepresentation of waste generation factors and should be stricken from the DEIR. It assumes that all growth increases waste. Regulatory environments, public awareness, manufacturers' responsibility among other factors, contribute to waste reduction, reuse, and recycling. Case in point, California's residential per capita disposal average in 1990 was 3.1 pounds per day and in 2005 was 2.5 pound per day.

This contradicts the previous statement unless the growth in the County has been nonexistent or reduced since 2005. Moreover, this statement supports the fact that waste generation is not directly attributed to growth and perhaps, it can be proven, that diversion programs have been successful in reducing landfill waste.

The respective disposal to ADC percentages for the years 2004, 2005, 2006 and 2007 are 1.4%, 13%, 3% and 8%.

The Simi Valley Landfill, respective disposal to ADC percentages for the years 2004, 2005, 2006 and 2007 are 17%, 7.3%, 24% and 27%. This is a phenomenal ratio of disposal to ADC at the SVLRC and supports the false notion that greenwaste, shredded tires, construction materials and other materials are being diverted from the Simi Valley Landfill. There are also discrepancies in the annual mass of trash (tons/year) found on this table compared to *Table B-1-B-2 Baseline Estimated Trash Volumes & Daily Cover Needs by Year.* In particular Table 1 lists 2005 disposal as 2,098,103 tons and table B-1 B-2 lists 2005 disposal as 887,003.89 tons. **This is a significant variance of 1,211,100 tons**. The data on these tables and throughout the DEIR need to be resolved.

What is the impact on this to the SVLRC? There is no description of the waste leaving the county so the impact is not known. It is also unknown if this is a trend for future projections of county generated waste. Does the term "disposed of" mean landfilled? Or does it mean reused, recycled?

This graph illustrates the phenomenal misconception that ADC materials are recycled, reused or diverted off-site and it illustrates the significant amount of ADC that is permanently landfilled along with solid waste - with the percentage of ADC increasing annually. What is missing from this graph that needs to be shown is the separation of ADC and total disposal for Toland. Additionally, the report does not include a graph depicting waste and ADC for the proposed project in comparison to the existing conditions. Furthermore, there is no description as to the capacity of landfill in fulfilling its increased ADC requirements for the proposed project (2691 tons daily) where the ADC materials will come from and the composition of the ADC. If greenwaste is a primary component of the ADC, the Ventura County Board of Supervisors needs to fully investigate if permanent landfilling is the best use of organic green materials generated in a county rich with premium farmland and if composting is a better solution.

One quarter is not enough to statistically draw conclusions from. This table needs to show all quarters of 2008 compatible with the baseline established for air quality and greenhouse gas emissions.

Table B-1 B-1 under Air Quality list the air space available in cubic yards. Why are two different units (tons and cubic yards) used for airspace? It is difficult to ascertain the environmental impacts when different units are used to describe air space capacity.

The table accounts for closures but it does not, nor does the report, include data on the

Mesquite Regional Landfill in the Imperial County. The 2,290 acre landfill is under construction and expected to be operational in 2012 with a permitted capacity of 20,000 tons per day of municipal solid waste. This waste-to-rail system is being developed by the County Sanitation Districts of Los Angeles County.