VENTURA REGIONAL SANITATION DISTRICT
1001 PARTRIDGE DRIVE, SUITE 150 ▪ VENTURA, CA 93003-0704
A Public Waste Management Agency

November 5, 2020

Board of Directors
Ventura Regional Sanitation District
Ventura, California

PUBLIC HEARING FOR THE APPROVAL OF THE TOLAND OPTIMIZATION PLAN PROJECT AND CERTIFICATION OF THE FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

RECOMMENDATIONS:

A. Conduct a public hearing regarding the Final Supplemental Environmental Impact Report for the Toland Optimization Plan:

1. Call to order and open the Public Hearing.
2. Staff and consultant presentations.
3. Report of written communications by the Clerk of the Board.
4. Public Comment.
5. Close the Public Hearing.
6. Discussion and Deliberation by the Board of Directors.

B. Adopt Resolution No. 20-04:

1. Certification of the Toland Optimization Plan Project Final Supplemental Environmental Impact Report, and
2. Adoption of California Environmental Quality Act Findings, Mitigation Measures, Mitigation Monitoring Program, and Statement of Overriding Considerations.

C. Direct District General Manager, or his designee, to file a Notice of Determination pursuant to CEQA Guidelines §15094.

FISCAL IMPACT

The fiscal impact associated with this action is speculative, and would depend on the availability of additional Municipal Solid Waste (MSW) within the wasteshed. Assuming that additional MSW available above existing levels can be obtained, the project would have a positive fiscal benefit in the form of increased net revenues.

INTRODUCTION & BACKGROUND

On May 22, 1996, the Ventura County Board of Supervisors approved Conditional Use Permit No. 3141 (the CUP) for the Toland Road Landfill (TRL) pursuant to the Final Environmental Impact Report (EIR) dated January 1996, which was certified by the VRSD Board on February 1, 1996. These actions by the Ventura County Board of Supervisors and the VRSD Board of Directors were necessitated by the closure of the Bailard Landfill

in Oxnard and the continuing need for a municipal solid waste landfill to serve western Ventura County residences, businesses, industry and agriculture.

The CUP allows the TRL to accept 1,500 tons of waste per day until May 31, 2027, or when 15 million tons of waste have been placed, whichever comes first, regardless of whether the permitted final elevation of the landfill is reached. Given current waste deliveries and expected compaction rates, VRSD has determined that the TRL will not be filled to the permitted elevations in the CUP when the CUP expires in 2027.

The Toland Optimization Plan project seeks to modify these permit restrictions in the CUP to allow the publicly-owned and operated TRL asset to be optimally utilized for the benefit of Ventura County residents, consistent with County of Ventura General Plan Goals for solid waste disposal capacity.

Projections made for the CUP in 1996 indicated that the TRL would be filled in approximately 31 years at a waste acceptance rate of 1,500 tons per day (tpd), or equivalently, 462,000 tons per year (Table 2.2, 1996 EIR). However, TRL has accepted considerably less than 462,000 tons per year on average as a result of economic downturns, as well as operational and regulatory realities that make it impossible to accept 1,500 tons in a single operating day.

Recent estimates indicate that due to the current constraints, the average daily tons received at TRL are 1,394 tpd, or 426,564 tons per year. Considering this rate and VRSD's estimate of waste capacity remaining at TRL (6,576,216 tons), TRL would not reach capacity for another 15.4 years, or until March 2036.

PLANNING HISTORY

Given the foregoing background, in 2016 the VRSD Board requested District staff to seek a modification of the CUP to extend the expiration date or usable life of TRL. Based on a subsequent evaluation in 2017, the VRSD Board directed staff to request an increase to the 1,500 tpd limitation by approximately 300 tpd.

District Staff engaged Rincon Consultants, Inc. to prepare the necessary California Environmental Quality Act (CEQA) documents and analyses for a modification to the TRL CUP.

In July 2017, District Staff met with County Supervisor Kelly Long to discuss the TRL project. Supervisor Long requested District staff to reach out to the property owners surrounding the property (the Toland Group) to facilitate communication regarding the project. The first of several in-person meetings between the Toland Group and District staff was held in September 2017.

In September 2017, an application for a Major Modification to the CUP was submitted to Ventura County Planning. A CEQA scoping meeting was held in January 2018, after the County application was deemed complete.

In late 2017, a Toland Group representative indicated support for a project that would facilitate a daily increase in MSW to greater than 1,800 tpd. In pursuit of a potential

agreement for support, VRSD staff held discussions with Toland Group representatives from early 2018 to January 2019.

In a VRSD Board meeting on March 21, 2019, the VRSD Board directed staff to seek an increase in daily tonnage of 660 tpd for a total allowable amount of 2,160 tpd. Subsequently, on May 16, 2019, the VRSD Board rescinded its direction to increase the allowable daily tonnage to 2,160 tpd and provided the following direction:

Finalize the Modification to the CUP for the Toland Road Landfill to effect the following:

- Remove the 2027 closure date; instead remain open until filled
- Remove the lifetime limit of 15 million tons; instead fill to the 1,435 foot elevation approved in the 1996 CUP
- Work with County Planning to fashion a project description that would:
    - Accommodate VRSD's fiscal needs
    - Handle the Western Ventura County MSW stream
    - Be sufficient to address operational fluctuations and emergencies
    - Maximize utilization of the remaining Toland Road Landfill capacity
    - Minimize or avoid potentially significant environmental impacts

PROPOSED TOLAND OPTIMIZATION PLAN

The proposed Toland Optimization Plan, as further described and evaluated in the Supplemental EIR, reflects the VRSD Board's direction as of May 2019. The application for a revision to the Solid Waste Facilities Permit and an update to the Joint Technical Document have been submitted to the Local Enforcement Agency at Ventura County, and are being processed in parallel with the CUP modification.

The Supplemental EIR evaluates the proposed changes to operation of TRL resulting from the following specific CUP modifications:

1. Remove the existing maximum permitted disposal rate of 1,500 tpd (Condition 3.j) and
   replace it with a condition that allows a maximum daily tonnage to be based on the capacity
   of 152 heavy truck trips per day as evaluated in the 1996 FEIR for the current CUP;
2. Allow TRL to be filled to its maximum elevation of 1,435 feet amsl as set forth in the current CUP (Condition 5.a.2.a);
3. Remove the 2027 closure date (Condition 5.a.2.b);
4. Remove the 15-million-ton lifetime cap (Condition 5.a.2.c); and
5. Modify the CUP Conditions of Approval related to the decommissioned biosolids facility.

The Supplemental EIR focuses on the evaluation of topics for which the project has the potential to create a significant impact under CEQA including; air quality, greenhouse gas emissions, noise and transportation. Based on the analysis in the Supplemental EIR, the proposed project would not result in any new significant impacts not previously identified in the 1996 Final EIR.

The Draft Supplemental EIR was circulated for a 45-day public review beginning on July 24, 2020 and ending on September 7, 2020. Seven comment letters were received on the Draft Supplemental EIR, and are included in the Final Supplemental EIR, along with responses to those comments.

This letter and the associated attachments have been reviewed by Legal Counsel as to form.

If you should have any questions or need additional information, please contact me at (805) 658-4600 or via email at ChrisTheisen@vrsd.com.

APPROVED FOR AGENDA _____

Chris Theisen, General Manager

Attachments:
1. Resolution No. 20-04
2. Estimate of Waste Tons Available for Disposal at the Toland Road Landfill
3. Calculation of Tons of Waste Associated with the Limit of 152 Heavy Truck Trips from the 1996 FEIR
4. Landfill Closure Date Projections Under Various Scenarios
5. Landfill Volumetric Capacity and Landfill Tonnage Capacity
6. Draft Supplemental EIR for the Toland Optimization Plan (previously provided)
7. Final Supplemental EIR for the Toland Optimization Plan

VENTURA REGIONAL SANITATION DISTRICT
BOARD OF DIRECTORS
RESOLUTION NO. 20-04

CERTIFICATION OF THE TOLAND OPTIMIZATION PLAN PROJECT FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT AND ADOPTION OF CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS, MITIGATION MEASURES, MITIGATION MONITORING PROGRAM, AND STATEMENT OF OVERRIDING CONSIDERATIONS

The Ventura Regional Sanitation District ("District"), as lead agency under the California Environmental Quality Act ("CEQA"), has completed the Final Supplemental Environmental Impact Report for the Toland Optimization Plan ("Project"), which presents an assessment of the reasonably foreseeable and potentially significant environmental impacts that may occur from the implementation of the Project. The Project is defined as:

> Modifying the current County of Ventura-issued Conditional Use Permit No. 3141, Mod. #3 (CUP) for the Toland Road Landfill ("TRL") to:
>
> 1. Remove the existing maximum permitted disposal rate of 1,500 tons per day (tpd) (Condition 3.j) and replace it with a condition that allows a maximum daily tonnage to be based on the capacity of 152 heavy truck trips per day as evaluated in the 1996 FEIR for the current CUP;
> 2. Allow TRL to be filled to its maximum elevation of 1,435 feet above mean sea level (amsl) as set forth in the current CUP (Condition 5.a.2.a);
> 3. Remove the 2027 closure date (Condition 5.a.2.b);
> 4. Remove the 15-million-ton lifetime cap (Condition 5.a.2.c); and
> 5. Modify the CUP Conditions of Approval related to the decommissioned biosolids facility.

The proposed CUP Modification request would not modify the approved final grades or boundary of the TRL, equipment used on site, or the type of waste accepted. VRSD does not propose any physical improvements or operational changes to TRL as part of the CUP modification request. CUP Condition 5.a.2.a that limits the acceptance of total municipal solid waste (MSW) to the existing designated elevations and contours will remain in effect. As such, maximum MSW capacity of TRL would continue to be limited to the approved maximum elevation of 1,435 feet amsl, not by a total tonnage amount or to final closure date. This also means that the current CUP conditions that place a lifetime cap of 15 million tons of MSW to be buried at TRL (Condition 5.a.2.c) and the 2027 landfill closure date (Condition 5.a.2.b) would no longer be necessary and can be removed. These CUP conditions would be removed from the CUP because they do not reflect current landfill engineering and operational realities.

The Project requires approval of the CUP modification from the Ventura County Board of Supervisors. Other responsible and trustee agencies may have limited discretionary authority over permits and approvals needed to implement the Project, including the potential approval of an

updated Solid Waste Facility Permit from the County of Ventura Environmental Health Division on behalf of the California Department of Resources Recycling and Recovery ("CalRecycle"), and the potential approval of an updated Waste Discharge Requirement from Los Angeles Regional Water Quality Control Board.

The Project proponent is the Ventura Regional Sanitation District. This document contains the District's certification of the Final SEIR, its CEQA findings, a statement of overriding considerations supporting approval of the Project, and any mitigation measures and a mitigation monitoring program, as needed.

A Draft SEIR was released for public and agency review on July 24, 2020 (State Clearinghouse No. 2018011026). The Draft SEIR assesses the potential environmental effects of implementation of the Project, identifies means to eliminate or reduce potential adverse impacts (if necessary), and evaluates a reasonable range of alternatives to the Project. The Draft SEIR was prepared and completed in accordance with the CEQA Guidelines, specifically Title 14, California Code of Regulations, §§15153 and 15163. The Draft SEIR supplements the environmental impact analyses in the 1996 certified Final EIR for the Toland Road Landfill Expansion and Landfill Closure/Postclosure (State Clearinghouse No. 95031009). The 1996 certified Final EIR and its supporting documentation is hereby incorporated in this document by reference.

The Final SEIR is comprised of the Draft SEIR together with one additional volume that includes the comments on the Draft SEIR submitted by interested public agencies, organizations, and members of the public; written responses to the environmental issues raised in those comments; revisions to the text of the Draft SEIR reflecting changes made in response to comments and other information; and other minor changes to the text of the Draft SEIR. The Final SEIR is hereby incorporated in this document by reference.

I. CERTIFICATION OF THE FINAL SEIR

The Board of Directors of the Ventura Regional Sanitation District ("Board") certifies that it has been presented with the Final SEIR and that it has reviewed and considered the information contained in the Final SEIR prior to making the following findings and statement of overriding considerations in Section II, below.

Pursuant to CEQA Guidelines Section 15090 (Title 14, California Code of Regulations, § 15090), the Board certifies that the Final SEIR has been completed in compliance with CEQA and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 *et seq*.). The Board certifies the Final SEIR for the Project as described above.

The Board further certifies that the Final SEIR reflects its independent judgment and analysis.

II. FINDINGS

Having received, reviewed, and considered the Final SEIR and other information in the record of proceedings, the Board hereby adopts the following findings in compliance with CEQA and the CEQA Guidelines:

Part A: Findings regarding the environmental review process and the contents of the Final SEIR.

Part B: Findings regarding the significant environmental impacts of the Project, and the mitigation measures for those impacts, identified in the Final SEIR, and adopted as conditions of approval.

Part C: Findings regarding project alternatives, and the reasons that project alternatives are rejected.

Part D: Statement of Overriding Considerations determining that the benefits of implementing the Project outweigh the significant unavoidable environmental impacts that will result and therefore justify approval of the Project despite such impacts.

The Board certifies that these findings are based on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental issues identified and discussed in the Final SEIR. The Board adopts the findings and the statement in Parts A through D for the Project.

In addition to the findings regarding environmental impacts, alternatives, and overriding considerations, Part E, below, identifies the custodian and location of the record of proceedings, as required by CEQA.

Part F describes the Mitigation Monitoring Program for the Project. As described in Part F, the Board hereby adopts the Mitigation Monitoring Program as set forth in Exhibit B to these findings.

Part G, below, summarizes the findings and determinations regarding the Project.

A. Environmental Review Process

1. Notice of Preparation

On January 12, 2018 and on September 13, 2019, the District issued a Notice of Preparation (NOP) and Revised NOP, respectively, announcing the preparation of the Draft SEIR and describing its proposed scope. The District received written responses to the NOP from agencies, organizations, and individuals.

The District held public scoping meetings for the Draft SEIR on January 31, 2018 and October 2, 2019, at the District Office: 1001 Partridge Drive, Suite 150, in the City of Ventura. The meetings provided opportunities for interested parties to learn about the proposed project, and provide input. The District received nine (9) letters from public agencies, one (1) letter from a public stakeholder, and one verbal comment during the January 31, 2018 public meeting, during

the first NOP circulation period. The Revised NOP circulation period solicited nine (9) letters from public agencies and eleven (11) written comments from individuals.

Community input from these meetings was included as Appendix A to the Draft SEIR, and included: requesting an updated transportation analysis, concern for increased vehicle trips to the Toland Regional Landfill (TRL), requests for more detailed information on the TRL's daily throughput and total capacity, concern about noise issues, requests for a detailed evaluation of air quality issues--including specific pollutants, odors, specific emitters, and compliance with permits—and general questions about the project description and project implementation.

2. Preparation of the Draft SEIR

The District completed the Draft SEIR for the Project, and beginning on July 24, 2020, the District made the Draft SEIR available for review and comment. A Notice of Availability was published, and the period for receipt of comments on the Draft SEIR remained open until September 7, 2020. During the comment period, the District received seven written comments from state and local agencies, organizations, and individuals, in addition to one late comment letter received after the close of the comment period.

The Final SEIR was completed and made available to public agencies and members of the public on October 22, 2020.

The Final SEIR contains all of the comments received during, and immediately after, the public comment period, together with written responses to significant environmental issues raised in those comments, which were prepared in accordance with CEQA and the CEQA Guidelines.

The Board finds and determines that the Final SEIR provides adequate, good faith, and reasoned responses to all comments raising significant environmental issues.

3. Absence of Significant New Information

CEQA Guidelines Section 15088.5 requires a lead agency to recirculate an EIR for further review and comment when significant new information is added to an EIR after public notice is given of the availability of the draft EIR but before certification of the final EIR. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project proponent declines to implement. The CEQA Guidelines provide examples of significant new information under this standard. Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The Board recognizes that the Final SEIR incorporates information obtained by the District since the Draft SEIR was completed, and contains additions, clarifications, modifications, and other changes. With respect to this information, the Board finds as follows:

Other Changes. Various minor changes and edits have been made to the text and tables of the Draft SEIR, as described in Section 3 of the Final SEIR. These changes are generally of an administrative nature such as correcting typographical errors, making minor adjustments to the

data, and adding or changing certain phrases to improve readability. In addition, Final SEIR, Section 2 and Appendix F includes an evaluation of the Project's consistency with the County of Ventura's new 2040 General Plan, as requested by the County Planning Department in its comments on the Draft SEIR. The Board finds that these changes are of a minor, non-substantive nature and do not require recirculation of the SEIR.

In addition to the changes and corrections described above, the Final SEIR provides additional information in response to comments and questions from agencies and the public. The Board finds that this additional information does not constitute significant new information requiring recirculation, but rather that the additional information clarifies or amplifies an adequate SEIR.

Specifically, the Board finds that the additional information, including the changes described above, does not show that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The Draft SEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Based on the foregoing, and having reviewed the information contained in the Final SEIR and in the record of the District's proceedings, including the comments on the Draft SEIR and the responses thereto, and the above-described information, the Board hereby finds that no significant new information has been added to the Final SEIR since public notice was given of the availability of the Draft SEIR that would require recirculation of the SEIR.

4. Differences of Opinion Regarding the Impacts of the Project

In making its determination to certify the Final SEIR and to approve the Project, the Board recognizes that a range of technical and scientific opinion exists with respect to certain environmental issues. The Board has acquired an understanding of the range of this technical and scientific opinion by its review of the Draft SEIR, the comments received on the Draft SEIR and the responses to those comments in the Final SEIR, as well as testimony, letters, and reports regarding the Final SEIR and its own experience and expertise in these environmental issues. The Board has reviewed and considered, as a whole, the evidence and analysis presented in the Draft SEIR, the evidence and analysis presented in the comments on the Draft SEIR, the evidence and analysis presented in the Final SEIR, the information submitted on the Final SEIR, and the reports prepared by the experts who prepared the SEIR, by the District's consultants, and by staff,

addressing those comments. The Board has gained a comprehensive and well-rounded understanding of the environmental issues presented by the Project. In turn, this understanding has enabled the Board to make its decisions after weighing and considering the various viewpoints on these important issues. The Board accordingly certifies that its findings are based on full appraisal of all of the evidence contained in the Final SEIR, as well as the evidence and other information in the record addressing the Final SEIR.

B. Impacts and Mitigation Measures

These findings provide the written analysis and conclusions of the Board regarding the environmental impacts of the Project identified by the Final SEIR. As indicated in the Final SEIR, impacts under the Project would not be greater than those determined in the 1996 certified Final EIR, and no new mitigation is required.

In making these findings, the Board has considered the opinions of other agencies and members of the public, including opinions that may disagree with some of the analysis and significance thresholds used in the SEIR. The Board finds that the determination of significance thresholds is a judgment within the discretion of the Board; the significance thresholds used in the SEIR are supported by substantial evidence in the record, including the expert opinion of the SEIR preparers and District staff; and the significance thresholds used in the SEIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project.

In particular, the SEIR relied on significance criteria for evaluating impacts that are tailored to this type of project. The criteria used in this SEIR to determine whether an impact is or is not "significant" are based on (a) CEQA-stipulated "mandatory findings of significance" listed in CEQA Guidelines §15065; (b) the relationship of the Project's effect to the adopted policies, ordinances and standards of the District, County of Ventura, and of responsible agencies; and (c) commonly accepted practice, and the professional judgment of the SEIR authors, and District staff.

Exhibit A attached to these findings, and incorporated herein by reference, summarizes the environmental determinations of the Final SEIR about the Project's significant impacts. Exhibit A does not attempt to describe the full analysis of each environmental impact contained in the Final SEIR. Instead, Exhibit A provides a summary description of each significant impact, and states the Board's findings on the significance of each impact. A full explanation of these environmental findings and conclusions can be found in the Final SEIR, and these findings hereby incorporate by reference the discussion and analysis in the Final SEIR, supporting the Final SEIR's determinations regarding the Project's impacts. In making these findings, the Board ratifies, adopts, and incorporates the analysis and explanation in the Final SEIR, and ratifies, adopts, and incorporates in these findings the determinations and conclusions of the Final SEIR relating to environmental impacts, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

The Board adopts the mitigation measures set forth in the Mitigation Monitoring Program, attached to these findings as Exhibit B, to reduce or avoid the potentially significant and significant impacts of the Project. The Final SEIR did not identify any new mitigation measures, however,

applicable mitigation from the 1996 FEIR is included for historical information purposes and to show that these already-adopted mitigation measures continue to apply to the Project. Accordingly, in the event a mitigation measure recommended in the 1996 certified Final EIR has inadvertently been omitted from Exhibit B, such mitigation measure is hereby adopted and incorporated in the findings below by reference. In addition, in the event the language describing a mitigation measure set forth in Exhibit B fails to accurately reflect the mitigation measures in the 1996 certified Final EIR due to a clerical error, the language of the mitigation measure as set forth in the Final SEIR shall control, unless the language of the mitigation measure has been specifically and expressly modified by these findings.

The Board hereby finds that the adopted mitigation measures are changes or alterations that have been required in, or incorporated into, the Project which mitigate or avoid significant effects on the environment.

C. Basis for the Board's Decision to Approve the Project

1. Summary of Discussion of Alternatives in the Final SEIR

The Final SEIR evaluates a number of potential alternatives to the Project. The Final SEIR examines the environmental impacts of each alternative in comparison with the Project, and the relative ability of each alternative to satisfy project objectives. The Final SEIR also describes the criteria used to identify a range of reasonable alternatives for review in the Final SEIR. The Final SEIR indicates that the Project would not result in any new significant and unavoidable impacts not previously identified in the 1996 certified Final EIR.

2. The Board's Findings Relating to Project Alternatives

In making these findings, the Board certifies that it has independently reviewed and considered the information on alternatives provided in the Final SEIR, including the information provided in comments on the Draft SEIR, and the responses to those comments in the Final SEIR. The Final SEIR's discussion and analysis of these project alternatives is not repeated in these findings, but the discussion and analysis of the alternatives in the Final SEIR is incorporated in these findings by reference.

The Final SEIR describes and evaluates, in detail, four (4) alternatives to the Project in terms of Project Objectives (see Draft SEIR, Section 6.1). As set forth and explained in section II.B. above, the Board has included already-adopted applicable mitigation measures from the 1996 certified Final EIR. And as further explained in section II.D. below of these Findings, the SEIR did not identify any new significant impacts as a result of the proposed Project and therefore no new mitigation measures are proposed for the Project.

The Board finds that the Project and Alternative 2 would satisfy all of the Project Objectives, but Alternative 2: Transportation Improvements would satisfy the Project Objectives to a lesser extent. The Board finds that the remaining project alternatives are unable to satisfy the Project Objectives. The Board further finds that, on balance, none of the project alternatives has environmental advantages over the Project that are sufficiently great to justify approval of such an alternative instead of the Project, in light of each such alternative's inability to satisfy the Project

Objectives to the same degree as the Project. Additionally, the project alternatives considered would have greater environmental impacts, in some cases. Accordingly, the Board has determined to approve the Project instead of approving one of the project alternatives.

In making this determination, the Board finds that when compared to the project alternatives described and evaluated in the Final SEIR, the Project, provides a reasonable balance between fully satisfying the Project Objectives and reducing potential environmental impacts to an acceptable level. The Board further finds and determines that the Project should be approved, rather than one of the project alternatives, for the reasons set forth below.

a. Description of Project Objectives

The Project Objectives are to:

1. Maximize the use of the remaining MSW disposal capacity (*i.e.*, landfill airspace) at TRL without expanding the operational landfill footprint;
2. Ensure adequate financial resources are available for VRSD to oversee landfill operations, environmental compliance, and closure and post-closure operations at TRL;
3. Maximize in-county public waste disposal capacity at TRL which conforms to the Public Facilities, Services and Infrastructure Element in the existing and proposed amended County General Plan;
4. Maximize in-county waste disposal capacity at TRL which minimizes travel distances and related air pollutant and greenhouse gas emissions for waste hauling vehicles; and
5. Maximize TRL operational flexibility by basing operational protocols on total design capacity and wasteshed demand, similar to other area landfills.

b. Discussion and Findings Relating to the Alternatives Evaluated in the Draft SEIR

Alternative 1: No Project / Existing TRL Operations to Remain

Under CEQA, a "No Project Alternative" compares the impacts of proceeding with a proposed project with the impacts of not proceeding with the proposed project. A No Project Alternative describes the environmental conditions in existence at the time the Notice of Preparation was published, along with a discussion of what would be reasonably expected to occur at the site in the foreseeable future, based on current plans and consistent with available infrastructure and community services.

Under No Project Alternative, the existing operations in place at the TRL would continue, with a maximum waste acceptance of 1,500 tpd, an average of 85 heavy trucks per day, a maximum lifetime cap of 15 million tons, and a closure date of 2027. None of the adverse or beneficial environmental impacts of the Project would occur.

Alternative 1 would fail to achieve any of the Project Objectives 1-5 listed in section II.C.2.a above.

Alternative 1 would result in greater impacts to greenhouse gas (GHG) emissions and traffic, lesser noise impacts, and similar air quality impacts. On balance, the environmental benefits that might be achieved with this alternative are outweighed by its increased environmental impacts compared to the Project, its reduced environmental benefits compared to the Project and its inability to fully satisfy all project objectives, and the Board rejects this alternative.

Alternative 2: Transportation Improvements

This alternative assumes the same uses as the Project in the same proportions, with the addition of local improvements to the circulation system to reduce conflicts with local traffic accessing the Santa Clara Elementary School. The improvements that could be implemented under this alternative would be subject to Caltrans review and approval, as all involve modifications to State Highway 126. Because this roadway is managed by Caltrans, it would require a lengthy planning and evaluation process, authorization by Caltrans, as well as securing sufficient funding for such modifications, if any. Caltrans support and approval for such modifications to Highway 126 are speculative, and ultimately, the improvements are likely not feasible as defined and discussed in CEQA Guidelines §§15126.6 and 15364.

Alternative 2 would meet all Project Objectives 1-5 listed in section II.C.2.a above, but the potential cost for planning and implementing transportation improvements may inhibit or compromise Project Objective 2 related to adequate financial resources being available for the District to oversee landfill operations, environmental compliance, and closure and post closure operations at TRL.

Alternative 2 would result in greater and potentially significant noise impacts, lesser traffic impacts, and similar air quality and GHG emission impacts. Alternative 2 was determined to be the "environmentally superior alternative" under CEQA. However, this alternative may not be feasible due to the required Caltrans coordination, review and approvals. Additionally, the potential cost for planning and implementation may inhibit or compromise Project Objective 2. On balance, the environmental benefits that might be achieved with this alternative are outweighed by its potential cost and difficult implementation, which make this alternative infeasible, and the Board rejects this alternative.

Alternative 3: Intermediate MSW Increase – 1,891 tpd Alternative

This project alternative would increase the daily tonnage to the TRL, similar to the Project; however, the increase would be limited to 1,891 tpd (instead of 2,864 tpd under the Project), and 100 heavy trucks per day. This alternative would provide less flexibility than the Project, and thus not able to accommodate increases in MSW within the western Ventura County wasteshed when they occur. This alternative is also likely to further extend the life of the landfill compared to the proposed project.

Alternative 3 would meet all Project Objectives 1-5 listed in section II.C.2.a above, to a lesser extent than the Project due to the limited operational flexibility of this alternative.

Alternative 3 would result in greater GHG emissions impacts, lesser noise impacts, and similar air quality and traffic impacts. On balance, the environmental benefits that might be

achieved with this alternative are outweighed by its increased environmental impacts compared to the Project, its reduced environmental benefits compared to the Project and its impairment of the ability to fully satisfy all project objectives, and the Board rejects this alternative.

Alternative 4: Minor MSW Increase – 1,700 tpd

Similar to the Project, this alternative would increase the daily tonnage to the TRL, but the tonnage increase would be limited to 1,700 tpd (instead of 2,864 tpd under the Project) and 92 heavy trucks per day. This alternative would provide less operational flexibility than the Project, and thus not able to accommodate increases in MSW within the western Ventura County wasteshed when they occur. This alternative would further extend the life of the landfill compared to the proposed project.

Alternative 4 would not meet any of the Project Objectives 1-5 listed in section II.C.2.a above, as it would not maximize the use of the remaining disposal capacity, provide adequate financial resources, maximize in-county public waste disposal capacity, or provide operational flexibility.

Alternative 4 would result in lesser beneficial reductions in GHG emissions (compared to the Project), lesser noise impacts, and similar air quality and traffic impacts. On balance, the environmental benefits that might be achieved with this alternative are outweighed by its reduced environmental benefits compared to the Project and its impairment of the ability to fully satisfy all project objectives, and the Board rejects this alternative.

Summary of Findings Regarding Alternatives. For all of the foregoing reasons, the Board has determined to approve the Project instead of one of the four alternatives to the Project.

D. Statement of Overriding Considerations

1. Impacts That Remain Significant

As discussed in Exhibit A, the Board has found that the Project would not result in any significant impacts not previously identified in the 1996 certified Final EIR. The 1996 certified Final EIR found the following impacts of the Toland Road Landfill Expansion Project would or could remain significant following implementation of the mitigation measures as described in the 1996 certified Final EIR:

1. Significant and unavoidable cumulative noise impacts at the Santa Clara School, primarily related to non-project related traffic volumes on Highway 126.
2. Significant and unavoidable off-site mobile emissions, resulting from an increase in VMT compared to the now closed Ballard Landfill. As indicated in the Draft SEIR, the Project would result in a net decrease in VMT and related off-site mobile emissions compared to disposal of waste at Simi Valley landfill.
3. Significant and unavoidable cumulative traffic impacts at Toland Road/Highway 126, as Caltrans approval was required to implement proposed mitigation. Traffic improvements were subsequently implemented. Based on the analysis in the SEIR, impacts to transportation and traffic would be less than significant.

2. Overriding Considerations Justifying Project Approval

In accordance with CEQA Guidelines Section 15093, the Board has, in determining whether or not to approve the Project, balanced the economic, social, technological, and other project benefits against the Project's unavoidable environmental risks, and finds that the benefits of the Project set forth below outweigh the significant adverse environmental effects that are not mitigated to less than significant levels. This statement of overriding considerations is based on the Board's review of the Final SEIR and other information in the administrative record. Each of the benefits identified below provides a separate and independent basis for overriding the significant environmental effects of the Project. The benefits of the Project are as follows:

1. Continued access to the only publicly-owned, publicly-financed and publicly-operated Ventura County landfill for western Ventura County;
2. Continued low-cost, reliable MSW disposal capacity for Ventura County residents and businesses;
3. Continued public management and stewardship of the western and central Ventura County waste-stream;
4. Extension of use of an existing landfill, thereby deferring the need for new landfill development, and related impacts, including the commitment of land, resources, energy and labor, to serve the wasteshed; and
5. A reduction in VMT for transfer trucks delivering MSW, thereby generating fewer greenhouse gas and criteria air pollutant emissions compared to the existing waste haul route in order to advance California's ambitious climate goals.

E. Record of Proceedings

Various documents and other materials constitute the record upon which the Board bases these findings and the approvals contained herein. The location of these documents and materials is at Ventura Regional Sanitation District, 1001 Partridge Drive, Suite 150, in the City of Ventura or online at the District's website: https://www.vrsd.com/. The custodian of these records and materials is Chris Theisen, General Manager, (805) 658-4600, ChrisTheisen@vrsd.com.

F. Mitigation Monitoring Program

While the SEIR did not identify any new significant impacts requiring mitigation, mitigation measures from the 1996 certified Final EIR remain applicable to TRL operation. In accordance with CEQA and the CEQA Guidelines, the Board must adopt a mitigation monitoring program to ensure that the mitigation measures adopted herein are implemented. The Board hereby adopts the Mitigation Monitoring Program for the Project attached to these findings as Exhibit B.

G. Summary

1. Based on the foregoing findings and the information contained in the administrative record, the Board has made one or more of the following findings with respect to each of the significant environmental effects of the Project identified in the Final SEIR:

a. Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects on the environment.

b. Those changes or alterations that are wholly or partially within the responsibility and jurisdiction of another public agency have been, or can and should be, adopted by that other public agency.

c. Specific economic, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final SEIR that would otherwise avoid or substantially lessen the identified significant environmental effects of the Project.

2. Based on the foregoing findings and information contained in the record, it is hereby determined that:

a. All significant effects on the environment due to approval of the Project have been eliminated or substantially lessened where feasible.

b. Any remaining significant effects on the environment found unavoidable are acceptable due to the factors described in the Statement of Overriding Considerations in Section II.D, above.

PASSED, APPROVED AND ADOPTED this _____ day of November, 2020 by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

_____
Bert Perello, Chairperson
Board of Directors

Attest:

_____
Juliet Rodriguez
Clerk of the Board

EXHIBIT A

Project Impact	Mitigation Measure(s)	Residual Impact/ Findings of Significance
Air Quality		
Impact AQ-1. The proposed project would not exceed any of the thresholds set forth in VCAPCD air quality assessment guidelines and would not be inconsistent with the 2016 AQMP. Therefore, air quality impacts under the proposed project would not be greater than those determined in the 1996 FEIR.	No new mitigation is required.	Less than significant.
Greenhouse Gas Emissions		
Impact GHG-1. Operation of the proposed project would generate a net reduction in GHG emissions associated with mobile sources. Therefore, the project would not result in environmental impacts for GHG emissions, either project specifically or cumulatively, as set forth in CEQA Guidelines Section 15064 (h)(3), 15064.4, 15130 (b)(1)(B), 15130(d) and 15183.5. Therefore, the proposed project would not result in a new significant impact that was not identified in the 1996 FEIR.	No new mitigation is required.	Less than significant.
Noise		
Impact N-1. Project-related trips would increase roadway noise levels along Toland Road and State Route 126. The 1996 FEIR concludes that the Toland Road Landfill Expansion and Closure/Post-closure Project would have a potentially significant roadway noise impact and mitigation was required to reduce this impact to a less-than-significant level. The proposed project would result in less than significant roadway noise impacts. Therefore, roadway noise impacts under the proposed project would not be greater than those determined in the 1996 FEIR.	No new mitigation is required.	Less than significant.
Impact N-2. Project truck traffic would expose nearby sensitive receivers to increased vibration levels when trucks pass by. Vibration levels would not exceed 100 VBD, the threshold at which damage may occur to typical buildings, 75 VBD, the threshold for institutional land uses with primarily daytime use, or 72 VDB, the threshold for residences during nighttime hours. The proposed project would have a less than significant vibration impact.	No new mitigation is required.	Less than significant.
Transportation and Traffic		
Impact T-1. The proposed CUP amendment would result in decreased VMT. Therefore, the proposed project would be consistent with CEQA Guidelines Section 15064.3 subdivision (b) and impacts would be less than significant.	No new mitigation is required.	Less than significant.
Impact T-2. Existing intersection and roadway conditions at State Route 126 and Toland Road would provide adequate site access and the proposed project would not create hazardous traffic conditions. Project impacts would be less than significant.	No new mitigation is required.	Less than significant.
Impact T-3. The proposed project does not include features that would impede emergency vehicle access. Project impacts would be less than significant.	No new mitigation is required.	Less than significant.

Project Impact	Mitigation Measure(s)	Residual Impact/ Findings of Significance
Impact T-4. The proposed project would not involve any disruptions to the local active transportation system. Further, the proposed project would not conflict with applicable policies associated with public transit. Therefore, the project would have no impact.	No new mitigation is required.	No impact.

EXHIBIT B

1996 FEIR Appendix A

TABLE A.1. OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS, AND MITIGATION MEASURES

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
Geology and Soils	The primary geology, soils and seismicity requirements for the project are contained in CCR Titles 14 and 23, and Subtitle D. These regulations require that new or expanded Class lll landfills: • Be located where soil characteristics, distance from waste to ground water, and other factors will assure no impairment of beneficial uses of surface water or ground water. • Not be located within 200 feet of a known Holocene fault • Be designed to withstand the maximum probable earthquake (MPE) without damage to the foundation or to the structures which control leachate, surface drainage, erosion or gas. • Be designed such that the integrity of the final slopes are maintained under both static and dynamic conditions. • Final fill slopes shall not be steeper than 1.75:1 with a minimum of one 15-foot-wide bench for every 50 feet of vertical. • Slopes steeper than 3:1 shall be engineered and a slope stability report shall be prepared.	Geologic or seismic conditions would not result in significant Impacts to the proposed project. However, to assure that the potential impacts remain below a level of significance, the following mitigation measures shall be implemented as part of the proposed project: • A slope or foundation stability report shall be prepared by a registered civil engineer or certified engineering geologist. The report must indicate a factor of safety for the critical slope of at least 1.5 under dynamic conditions. In lieu of achieving a factor or safety of 1.5 under dynamic conditions, a more rigorous analytical method that provides a quantified estimate of the magnitude of movement may be employed. • Excavation for the landfill liner system in the area of the bedrock feature identified by Fugro in 1992 shall be observed by a registered certified engineering geologist, registered geologist, or a professional engineer. Should geologic hazards be encountered, appropriate engineering methods shall be employed to assure that the landfill and its components are designed in accordance with applicable regulations. (Final EIR) • Significant slopes (including cut, fill and waste prism slopes greater than 20 feet high and steeper than 3:1) shall be designed to comply with CCR Titles 14 and 23, and Subtitle D requirements for the identified MPE peak ground acceleration for the site and a factor of safety of 1.5, or subsequent analysis shall be performed to calculate the magnitude of movement which are acceptable. • Sideslope excavations shall include 25-foot wide benches every 50 vertical feet to provide safety for site workers and the public from potential falling rocks and boulders. (Final EIR) • Parameters developed by geosynthetic and geotechnical testing shall be included in the analysis of liner systems on sideslopes. Residual strength values (i.e., after shearing) shall be used, control of peak strengths can be demonstrated. • Slope buttresses shall be provided, if necessary, to increase slope stability and reduce deformations.	On a quarterly basis; as a quarterly Report. As needed, on a cell by cell basis; in conjunction with the design of cell by the design engineer. As needed; completed as part of normal operations—also included in the JTD. Completed as part of Operations, as needed. As needed: by design engineer. In conjunction with each cell expansion.

[1] The operational procedures and regulatory requirements included in this table are specified in Chapter 3.0 of the Draft EIR.
[2] The mitigation measures included in this table are listed in Table 1.1 of the Draft EIR and are specified in Chapter 3.0 of the Draft EIR.
[3] Based on public and agency comments on the Draft EIR, additional and/or revised mitigation measures for the proposed project have been included in this Final EIR. For reference purposes, mitigation measures added and/or revised by this Final EIR are designated by (Final EIR) at the end of the measure.

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
		• When expansive soils are excavated and become part of the mixed soil type, expansive index tests shall be performed to verify the suitability of the material for use as cover and/or fill material. (Final EIR)	No expansive soils excavated.
		• A post-earthquake inspection plan shall be submitted for approval by the RWQCB and LEA which provides for detailed site inspection after an earthquake of M5.0 or greater within 40 km of the site to determine the integrity of landfill structures and systems. The plan shall identify appropriate measures which may be initiated to correct earthquake-related damage.	No M 5.0 or greater events to date.
		• A routine inspection plan shall be developed and implemented by a registered certified engineering geologist, registered geologist, or a professional engineer to examine slope conditions.	Quarterly
		• A maximum setback for clean fill slopes shall be a minimum of 20 feet from the property line. (Final EIR)	Ongoing
Water Resources	The project includes various landfill design and operational features that would assure protection of ground water quality. The major features of the project relating to ground water quality protection are summarized below: • As required by CCR Titles 14 and 23, and Subtitle D, waste disposal areas would be constructed with composite liners and an LCRS. • A landfill gas collection system would be installed at the landfill. • A composite final cover system will be used to close the landfill. The proposed design will include a 2-foot foundation layer, 1.5 feet of low permeability soil, a FML, and 1-foot vegetation layer. • A ground water monitoring system would be developed in accordance with CCR Title 23, Chapter 15, Article 5. The following procedures shall be implemented by VRSD at Toland as part of the project to assure surface water quality and decrease stormwater runoff: • Construction of bench drains, down drains and perimeter ditches. • Construction of energy dissipation structures and interim desilting basins. • Routine maintenance of surface water management system structures.	The proposed project would not result in significant impacts to surface water or ground water quality. However, the following mitigation measures shall be Implemented as part of the proposed project • A detailed hydrology study using the County Flood Control District's Rational Hydrology Method shall be performed. The 100-year, 24-hour runoff quantities for existing conditions and the proposed project shall be calculated, and an increase in runoff due to the proposed project shall be eliminated with the construction of detention basin. • Detailed engineering calculations shall be performed to size and design the detention basin. • An investigation shall be conducted in the vicinity of the recorded location of the abandoned well. If located, and Ute well has not been properly abandoned, VRSD shall either close the well in accordance with the requirements of the County Public Works Agency, Water Resources and Development Division, or evaluate its potential use as a monitoring well or as a nonpotable water source for the proposed project. (Final EIR) • The engineering design of the sideslope liner shall include, as appropriate, methods to collect water from surface water seeps. (Final EIR)	Completed As needed; Updated in 2018 updated. Once Ongoing; as the liner is constructed.

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
	• Placement of soil berms around the landfill working face during storm events. • Construction of detention basin at south end or landfill footprint.	If the proposed project withdraws water from the Santa Paula-Sespe Basin, this withdrawal could incrementally contribute to the cumulative reduction of the outflow from this basin to the Oxnard Plain that is in overdraft. Based on discussions with the County Public Works Agency, it has been determined that the following mitigation measures would reduce the proposed project's incremental contribution to this cumulative impact to below a level of significance: • Low-flow plumbing fixtures shall be installed in onsite facilities. • Washwater from cleaning vehicles and equipment shall be collected and recycled, and reused for washing or dust control. The use of such water for dust control at the landfill shall be subject to the WDRs issued for the project by the RWQCB. (Final EIR) • Use of all-weather roads (i.e., paved and crushed rock) to reduce the amount of water required for dust control. • To offset the increase in water usage at Toland from wells under the proposed expansion (a maximum or 30 acre-feet per year), water usage from wells at VRSD's Ballard and Coastal landfills shall be decreased in like amounts to the greatest feasible extent. To the extent the Ballard and Coastal well usage cannot be sufficiently decreased to offset the total usage at Toland, VRSD shall provide funding to the County for the purchase of water from the state, including reasonable administrative costs, to facilitate ground water recharge. (Final EIR) • The priority in implementing these offset strategies shall be: - Reduce water usage at the Bailard and Coastal landfills to the greatest extent possible. - Provide for the purchase of state water to replenish ground water supplies. • If nonpotable water is applied to the landfill for dust control and/or irrigation, the use of such water shall be subject to the WDRs issued for the project by the RWQCB. (Final EIR)	Yes – All of the conditions are in place and a part of normal operations Once; in place Ongoing; part of operations Ongoing; part of operations Ongoing Once; completed
Biological Resources	No standard operating procedures or regulatory requirements are defined for biological resources at Toland. The following measures, included in the project, provide for the protection of plant and animal species and habitats: • Lighting would be shielded and internally directed so as to minimize effects to neighboring wildlife habitat.	Although the proposed project would not result in significant impacts to biological resources, the following mitigation measures shall be implemented as part of the proposed project: • The limits or the proposed expansion shall be modified to provide a minimal 50-foot setback from the riparian vegetation associated with the seep at the northern periphery of the proposed landfill footprint. The area of riparian	Ongoing

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
	• Use of artificial lighting during typical hours of darkness during October through March would be kept to a minimum and employed on as needed basis. At no time would artificial lighting be employed prior to 5:30 am or after 7:00 p.m. • Portable fences would be used to limit the spread of trash at the working face, and litter would be collected on a regular schedule. This would prevent a possible hazard to wildlife that may ingest or become trapped by such debris. • A phased habitat revegetation plan would be implemented during landfill operations and closure.	habitat shall be avoided and left in its natural condition. The landfill slope gradient south or the seep shall be designed to preclude the possibility for landslides due to gravity or storm events. • The bank or O'Leary Creek in the southwestern portion of the project site shall be screened with plants and shrubs to protect the canyon's use as a wildlife corridor. • Plantings around buildings and other landfill facilities shall consist of plants appropriate to the locale. This will help control invasive exotic populations and maintain biological productivity.	Until established; complete Until established; complete
Utilities, Services and Housing	The following design features shall be included in the project to assure that demands on utilities would be minimized: • Water consumption and wastewater disposal would be minimized by the use of low-flow toilets and low-volume water fixtures. • Energy-efficient lighting would be utilized in buildings and for onsite operation, consistent with safety and efficiency. • Onsite buildings would be insulated and provided with thermal· efficient windows and other features to reduce energy requirements for heating and air conditioning.	The proposed project would not result in significant impacts to utilities and services infrastructure or housing; therefore, no mitigation measures are required.	None required
Cultural Resources	No standard operating procedures for cultural resources are in place at the landfill. No regulatory requirements are currently In place for the management of cultural resources.	The proposed project would not result in significant impacts to cultural resources. However, the following mitigation measures shall be implemented as part of the proposed project: • Monitoring of site Ca-Ven-1237 shall be conducted by a professional archaeologist when grading, construction, or other project-related activities are conducted in the immediate vicinity or this potentially important archaeological site. • If previously unidentified human remains or other cultural resources are discovered during facilities development or operation, work in the discovery area shall cease immediately so that damage to the resource can be avoided or minimized. No further project-related activities in the discovery area shall be undertaken until the procedures defined at Appendix K. Sections VIII and IX of the CEQA Implementing Guidelines are completed. An archaeologist shall evaluate the importance of the site and, if necessary, develop and implement appropriate data recovery. The archaeologist shall be allowed to redirect grading from the area of exposed resources until inspection,	As needed; monitor is onsite during excavation in native soils.

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
		evaluation, and recovery activities are completed. Construction and landfill personnel should be informed of these requirements. Should future operations or construction design changes be planned that have the potential to affect rockshelter site Ca-Ven-1237, the following actions are recommended to assure that impacts remain below a level of significance: (Final EIR) • Recordation of the resource shall be completed by a professional archaeologist • A subsurface testing program shall be implemented by a professional archaeologist to determine if important subsurface cultural materials are present • If important cultural deposits are found to be present, a data recovery program shall be implemented by a professional archaeologist. The program shall provide for the recovery of archaeological and ecological data, laboratory cataloguing and processing, data analysis, and preparation and distribution of a technical report. • Archaeological materials recovered during surface collection, subsurface excavations, and monitoring, together with related records, notes, and technical reports, shall be curated in perpetuity at a regional repository that meets VRSD approval.	
Paleontological Resources	No standard operating procedures regarding paleontological resources are in place at the landfill. No regulatory requirements are defined for paleontological resources.	The proposed project would not result in significant impacts to paleontological resources. However, the following mitigation measures shall be implemented as part of the proposed project: • A paleontological monitoring program shall be implemented for grading or other land altering activities in the Pico Formation and the Las Posas Sand. Should future project design or operation changes necessitate grading or land altering activities in the Saugus Formation, the paleontological monitoring program shall be extended to this formation. A qualified paleontologist shall be retained for the monitoring effort. Monitoring shall reflect the VRSD's intent to research, recover, and preserve significant paleontological resources. • In the event that paleontological resources are discovered during grading or excavation, the paleontologist, following consultation with the project engineer, shall be allowed to redirect grading away from the area of exposed fossils to allow time for inspection, evaluation, and, if appropriate, recovery.	Ongoing; monitor is onsite during excavation in native soils.

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
		• In the event that significant paleontological resources are uncovered during excavation, earthmoving, and/or grading, work shall be redirected from the area until an appropriate data recovery program is developed and completed. • Recovered fossils, if any, shall be cleaned, cataloged, and identified lo the lowest taxon possible. A report containing monitoring results, including an itemized list of fossils, shall be submitted lo VRSD. A copy shall accompany the fossils to an appropriate repository. • Collected fossils shall be curated at a public institution with an educational/research interest in the material, such as the Natural History Museum of Los Angeles County. • The landfill shall remain accessible to qualified geologists and paleontologists for the study of the sedimentary rocks or the collection of additional fossil specimens exposed during the project.	
Land Use	Operational procedures and regulatory requirements which would affect land use compatibility are addressed within the respective sections in this EIR for land use-related impacts including air quality, visual, noise, traffic, nuisance, and public services and utilities.	The proposed project would not result in significant land use impacts; therefore, no mitigation measures are required.	None required
Visual Resources	The following procedures are part of the project and shall be implemented by VRSD to reduce or eliminate the potential visual impacts at the landfill, in accordance with regulatory and permit requirements: • Shielding and directing lights downward to prevent glare or direct illumination of offsite areas. • Revegetation of disturbed areas during phased closure of the landfill.	The proposed project would not result in significant impacts to visual resources: therefore, no mitigation measures are required. However, to assure that visual impacts remain below a level of significance, the following mitigation measure is included: • To the extent practicable, disturbed areas and final slopes of the landfill shall be regraded to blend with the surrounding terrain. (Final EIR)	Ongoing; in conjunction with regular operation.
Noise	No regulatory requirements are defined for controlling general noise levels along roadways and highways. Through the issuance and monitoring of conditions incorporated in a CUP, however, the County has the ability to assure that noise levels from onsite operations at Toland do not result in a nuisance at land uses in the vicinity of the landfill. CCR Title 14 and the SWFP, as administered by the Ventura County Environmental Health Division, also include	The following mitigation measures shall be implemented as part of the proposed project: • Construction activities shall only occur between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday. • Noise barriers shall be installed adjacent to the two residences on Toland Road to attenuate noise levels associated with landfill related traffic on Toland Road. A barrier height of approximately 6 feet shall be required to reduce noise levels to within County standards. The noise barrier may be a	Ongoing Once; completed.

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
	provisions to assure that landfill operations do not result in noise being a nuisance. In addition to the above permitting and monitoring of noise by the County, VRSD has the following operational controls in place that shall be continued as part of the project to control noise at Toland: • Landfill equipment would be maintained, including mufflers, to reduce noise levels. • Strict adherence to the landfill operating hours (6 a.m. to 7 p.m.) would avoid noise generating activities during the early morning and early evening.	berm, wall, or combination structure. A detailed noise analysis shall be utilized to determine the optimum materials and configuration of the noise barrier for the residences along Toland Road. Based on the proposed project's limited contribution (i.e., 0.6 dBA) to the existing and future cumulative traffic related noise levels on Highway 126, VRSD is not responsible for implementation of specific measures to reduce the existing or future noise levels at the Santa Clara School. The noise levels at the school are predominantly associated with non-project related traffic volumes on Highway 126.	
Traffic	Toland Road is a County maintained road and subject to County Road Standards and General Plan policies. Highway 126 is a state highway, regulated by Caltrans. Highway 126 Is also a part of the County's regional transportation network and governed by the County's CMP (VCTC, 1993).	• While VRSD is exempt from the County's traffic Impact Mitigation Fee Ordinance 4071 as a public agency, VRSD agrees to make a payment equivalent to the fee that would be required under Ordinance 4071 to mitigate the cumulative traffic impacts to the regional road network from the project. (Final EIR) • VRSD agrees to contribute to the cost of placing an appropriate asphaltic concrete overlay on Toland Road to assure that the pavement cross section on Toland Road is adequate for the anticipated traffic volume associated with the project. (Final EIR) • Although the Toland Road/Highway 126 intersection does not meet signal warrants, signalization of the intersection would result in improving the LOS at this intersection to acceptable levels which would meet both the County standard and County's CMP standards. If signalized, the intersection would operate at LOS "A" under existing, existing plus project, and cumulative project conditions. Since the Toland Road/Highway 126 intersection Is within the jurisdiction of Caltrans, it would be their ultimate decision, in consultation with the County, whether a traffic signal should be installed. The following mitigation measures are recommended for conditions with and without signalization: <u>With Signalization</u> - In conjunction with the traffic signal, appropriate signing, striping, and traffic control devices would be implemented to make people aware of the presence or the signal. <u>Without Signalization</u>	Once; complete. Once; complete. Improvements without signalization implemented in conjunction with Caltrans and the County.

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
		- Installation of "SLOW TRUCKS" signage would be installed on Highway 126 in advance of the intersection to warn motorists of the presence of project related trucks. - Signage would be provided on Highway 126 to clearly indicate the existence of the Toland Road intersection. - A flashing yellow beacon would be installed on Highway 126, since it can be used at intersections which require warning. This beacon would be used in conjunction with a timer, so it only operates while the landfill is in operation. - Basic intersection lighting would be provided at the intersection of Toland Road and Highway 126. (Final EIR) These measures would also be subject to Caltrans approval.	
Air Quality	The project includes various landfill design and operational features that would reduce air quality impacts. Operational features that are part of the project that relate to air quality include the following: • Landfill gas collection and destruction systems shall be provided and operated, as required by APCD Rule 74.17. • A landfill gas destruction system shall be constructed using best available control technology. • A network of landfill gas monitoring probes shall be installed to identify potential areas of subsurface landfill gas migrations. • Monitoring shall be continued during closure and post-closure activities as required by CCR Title 14, Section 17783.	Onsite emissions from the proposed project would not result in regionally or locally significant air quality impacts. The following mitigation measures for onsite emissions, however, shall be implemented as part of the proposed project to assure that impacts remain below a level of significance: • Expected service life for heavy equipment, such as that used at the landfill, is approximately 10,000 to 12,000 hours (Caterpillar, Inc., 1989). If landfill equipment is operated an average of 10 hours per day, its lifespan will be approximately 3 to 4 years, at which point it may require replacement. Landfill equipment which is to be routinely replaced prior to cessation of landfilling operations shall be replaced with lower emission type equipment. • Onsite vehicles shall be properly maintained. • Fugitive dust emissions shall be controlled through some combination of the following: - Paving of high use onsite roads. - Sweeping and/or water flushing of paved roads and work areas. - Installing paved aprons at the intersection of unpaved roads with paved roads. - A wheel washing station shall be installed that vehicles leaving the working face on dirt roads shall pass through at the apron to the onsite paved road (Final EIR) - Using chemical soil stabilizers on unpaved roads to provide a "semi-paved" road surface. - Watering of unpaved roads, storage piles, and work areas at least daily.	As needed; in conjunction with regular operation.

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
		- Using chemical dust suppressants, where appropriate, on inactive storage piles, disturbed areas and work areas. • Vehicles and equipment shall be restricted to specific onsite roads. • Vehicles and equipment shall be prohibited from traveling on areas of the landfill that are not watered for dust control. • The speed limit on landfill haul access roads shall be enforced at 25 mph on paved roads and 10 mph on unpaved roads. • Nearby unpaved roads shall be paved for the distance required to offset onsite and offsite mobile emissions of PM10 generated by the project. (Final EIR) The following are examples of mitigation measures that could reduce the regional impact associated with offsite mobile emissions: • The feasibility of the landfill employer providing worker rideshare incentives to reduce employee-related mobile source emissions shall be investigated. If determined feasible, a program shall be implemented. • Offsite mobile emissions associated with the proposed project could potentially be reduced through the purchase of mobile emission offsets. For example, VRSD's old vehicle retirement program implemented as mitigation at Bailard, could be expanded/continued to include Toland. Under such a program, older, high-emitting vehicles are purchased and removed from service, thereby reducing mobile emissions in the County.	
Health Risk Assessment	The project includes various landfill design and operational features that would reduce impacts from toxic air emissions. Operational features that relate to controlling toxic air emissions include the following: • A landfill gas collection and destruction system would be installed and operated, as required by APCD Rule 74.17. • The landfill gas destruction system shall be constructed using best available control technology (BACO, which would destroy a minimum of 98 percent of the toxic constituents in the landfill gas. • Screening for hazardous materials and hazardous waste through established load checking procedures.	The proposed project would not result in a significant health risk impact; therefore, no mitigation measures are required.	None required.

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
Nuisance	Various operational procedures and regulatory requirements included in CCR Title 14 are being adhered to as control measures to minimize the potential effects of vectors, birds, odors, and litter and illegal dumping associated with the existing operation of Toland. VRSD would continue to implement these measures to minimize potential impacts. in accordance with operational procedures and regulatory requirements specific to the proposed project • Good housekeeping practices at the landfill to reduce the potential of vector habitat or harborage. • Compaction of waste at the active working face. • Application of a minimum 6-inch thick layer of compacted soil, or approved alternative daily cover, during the day and at the end of the working day. · During periods of high winds, more frequent application of cover material. • Maintenance of the working face as small as safely practicable, given the type and number of landfill equipment operating there. • Installation of litter fences downwind of the working face. • Maintenance of the landfill site perimeter fence to provide additional litter control. • Use of litter control crews to routinely check the various fences and remove litter. • Inspection of roads leading to the landfill for litter and illegally dumped waste on a daily basis as landfill managers and supervisors travel to and from the site. Road inspection would include the access road, Toland Road, and Highway 126 for a distance of one-quarter mile on either side of the intersection with Toland Road. Litter control teams would be dispatched on an as-needed basis. • At the time of landfill closure, to minimize the potential for accumulation of litter and illegal dumping, signs would be posted at the landfill entrance and scalehouse as required by CCR Title 14. These signs would be posted a minimum of 60 days prior to landfill closure and would remain posted at least 180 days after the closure date. The signs would be written in	Nuisance impacts would be reduced to below a level of significance by existing operational procedures and regulatory requirements that would be implemented in association with the proposed project. Although nuisance impacts would be less than significant, this EIR recommends the following mitigation measures to assure that potential nuisance impacts from the proposed project remain below a level of significance: • Posting signs at the landfill entrance and scalehouse noting antilittering laws and the requirement for loads to be properly covered. • Notify the public of the legal requirement to properly cover waste loads in private vehicles. The program shall stress the need for and Importance of this requirement. • In the event a specific waste hauler is identified on a recurring basis regarding Inadequate covering of waste loads, the appropriate action shall be taken. Depending on the circumstances, the appropriate actions may include reporting the waste hauler to the LEA and/or to the County Sheriff's Department and California Highway Patrol. (Final EIR) • Dispatch crews at least weekly, or more frequently if required, to collect litter along the access road, Toland Road, and along Highway 126 within one-quarter mile to the east and west of the Toland Road Intersection. • Litter control crews shall inspect the landfill fences (permanent and portable fences) on a weekly basis and remove litter. (Final EIR) • During periods of high winds, litter control crews shall be dispatched at least twice weekly, or more frequently if required to inspect the landfill fences (permanent and portable fences) and remove litter. (Final EIR) • Litter control crews shall be dispatched on an as-needed basis if litter is seen blowing from the working face to onsite or offsite areas. {Final EIR) • Daily cover shall be applied immediately on top of any particularly odorous waste. (Final EIR) • Trained VRSD personnel shall periodically survey areas adjacent to the landfill for the presence of nuisance odors originating from the active working face. (Final EIR) • If monitoring detects offsite nuisance odors attributable to the active working face, landfill operators shall be instructed to apply additional daily cover material or odor suppressant foams if the use of foams has been determined to be feasible and effective at the landfill. The use of odor suppressant foams shall require the approval of the LEA, RWQCB and CIWMB. (Final EIR)	As needed; in conjunction with regular operation.

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
	both English and Spanish and would indicate the date of closure and alternative permitted landfills available to accept waste. In addition to the above, to control litter caused by waste hauling vehicles, regulatory mechanisms are in place through the California Motor Vehicle Code and the County inspection and tagging procedure for commercial waste hauling vehicles. Through enforcement by the County Sheriff's Department and the California Highway Patrol, litter blown from waste hauling vehicles would be minimized	• In the event birds are determined to be a nuisance at the landfill, additional measures shall be implemented (e.g., overhead bird wires, distress tapes, propane cannons). The effectiveness of these measures shall be monitored and, if found not to be effective, additional measure shall be developed. (Final EIR)	
Health and Safety	The following procedures are required by regulations or are part of the current operation and shall continue to be implemented by VRSD to reduce or eliminate the potential health and safety impacts at the landfill. in accordance with regulatory and permit requirements: • Daily fill and cover operations to minimi7.e hazards related to health and safety. • Provision of fire suppression equipment, such as fire extinguishers and dedicated water storage. • Maintenance of soil stockpile areas to be accessible for fire control. • Cleaning and inspection of landfill equipment on a regular basis to reduce potential for vehicle fires. • Maintenance of water trucks in such a manner that water would be available at all times for fire protection. • Strict enforcement of a no smoking policy on the landfill. • Monitoring of materials admitted to the site assure hot loads are not transported to the working face. In the event a hot load is transported to the working face the following procedures would be followed: - The driver would be instructed to dump the load in a separate area of the landfill which is clear of vegetation and debris, and away from the working race. - The landfill equipment operator would spread the material, then spray with water until extinguished. Soil may be used to extinguish the fire, if necessary, and the County Fire	The proposed project would not result in a significant health and safety impact; therefore, no mitigation measures are required.	None required.

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
	Department may be notified to provide assistance, as needed. - After verification that the fire is completely extinguished, the material would be transported to the working face, compacted, and covered. • Screening for hazardous materials and hazardous waste through established load checking procedures which include: - Training of personnel to identify suspicious loads. - Documenting the occurrence of hazardous wastes. • Installation of landfill gas and leachate monitoring systems at Toland. If monitoring indicates that impacts are occurring, appropriate control programs would be implemented. • Maintaining the landfill active working face to a minimum size. • Routine Inspections of the perimeter security fence and repairs made as necessary. Entrance and access gates are locked when the landfill is closed. • Scavenging is strictly prohibited. • Clear posting of speed limits, road boundaries, direction of travel, and the location of the working face. Strict enforcement of onsite speed limits. A traffic director would be responsible for controlling traffic entering the active working face area and assisting the Solid Waste Superintendent in assuring safe practices at the landfill. • Installation of safety devices, such as roll bars on heavy equipment and backup beepers on landfill equipment. • Provision of first aid kits and emergency eye wash and shower stations onsite. • Mandatory attendance of safety meetings by field employees. • A safety manual that includes VRSD's injury and illness prevention program is provided to employees, along with appropriate training. • Equipment approved by OSHA/Cal-OSHA, such as hard hats, steel-toe boots, breathing apparatus, and eye and hearing protection are provided. • Routine inspection of landfill cover materials to assure that if cracks or fissures develop, they are repaired in a timely manner.		

Topical Area	Operational Procedures and Regulatory Requirements[1]	Mitigation Measures[2,3]	Frequency; Status
	• Use of dust control measures to keep dust at a minimum and lessen incident or Valley Fever (see Section 3.12).		

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Toland Optimization Plan
Estimate of Waste Tons Available for Disposal at the Toland Road Landfill (TRL)

	1	2	3	4	5
A	Source of Waste	Average Daily Tons Received[1] at TRL (tpd)	Additional Daily Tons Available[2] for TRL (tpd)	Maximum Daily Tons Available[2] for TRL (tpd)	Average Daily Tons Assumed[3] for TRL (tpd)
B	Gold Coast Recycling Center and Transfer Station	928	172	1,100	1,100
C	City of Oxnard	350	550	900	675
D	City of Fillmore	21		21	21
E	City of Santa Paula	52		52	52
F	Santa Clara River Valley Residents	13		13	13
G	All other Solid Waste Customers	30		30	30
H	**TOTALS:**	**1,394**	**722**	**2,116**	**1,891**

1. Based on representative data collected by VRSD from January 1, 2019 through April 22, 2019
2. Based on VRSD estimates
3. Assumes 75% of the waste from the City of Oxnard and 100% of the waste from Gold Coast Recycling Center and Transfer Station is disposed of at TRL

Toland Optimization Plan
Calculation of the Tons of Waste Associated with the
Limit of 152 Heavy Truck Trips from the 1996 FEIR

	1	2	3	4	5
A	Source of Waste	Average Daily Tons Assumed for TRL[1] (tpd)	Daily Heavy Truck Trips Associated These Tons[1] (trips)	Daily Heavy Truck Trips Increased to Total 152[2] (trips)	Daily Tons Increased by Same Factor[3] (tpd)
B	Gold Coast Recycling Center and Transfer Station	1,100	50	76	1,667
C	City of Oxnard	675	35	53	1,022
D	City of Fillmore	21	3	5	31
E	City of Santa Paula	52	6	9	79
F	Santa Clara River Valley Residents	13		-	19
G	All other Solid Waste Customers	30	6	9	46
H	**TOTALS:**	**1,891**	**100**	**152**	**2,864**

1. Based on representative data collected by VRSD from January 1, 2019 through April 22, 2019 and VRSD estimates of other waste that might be disposed of at TRL in the future.
2. The trips in Column 3 were multiplied by a factor to reach the limit of 152 heavy truck trips from the 1996 FEIR. That factor is approximately 1.52.
3. The same factor (approximately 1.52) was applied to the tons in Column 2 to Estimate the number of tons associated with the limit of 152 heavy truck trips from the 1996 FEIR.

Toland Optimization Plan
Landfill Closure Date Projections Under Various Scenarios

	1	2	3	4	5
A	Permitted Daily Tons (tpd)	Practical Daily Tons[1] (tpd)	Estimated Years to Closure[2]	Estimated Closure Date[2]	Notes
B	1,500	1,394	15.4	March 2036	TOP SEIR Alternative No. 1 - No Project
C	1,700	1,594	13.5	April 2034	TOP SEIR Alternative No. 4
D	1,891	1,785	12.0	October 2032	TOP SEIR Alternative No. 3
E	2,864	1,891	11.4	February 2032	TOP SEIR Project or Alternative No. 2[3]

1. Practical tons are less than Permitted tons due to operational factors of safety to avoid violating the 1,500 tpd limit and the fact that less waste is typically delivered on Saturdays.

2. This assumes space for 6,576,216 tons and 306 operating days per year. Sample calculation below. (6,576,216 tons)*(1 day/1,394 tons)*(1 year/306 days) = 15.4 years

3. 2,864 tons are not actually available in the wasteshed. The VRSD estimated amount of available waste from TRL customers is 2,116 tpd. The practical amount VRSD assumes is 1,891 tpd.

LANDFILL VOLUMETRIC CAPACITY
(cubic yards)

	Total Capacity (cubic yards)	Net Capacity (1) (cubic yards)
Current Design	23,621,551	22,587,702
Current Permitted (2)	30,000,000	-
Currently In-Place (3)	15,703,300	15,280,795
Remaining Capacity - Permitted	14,296,700	-
Remaining Capacity - Design	7,918,251	7,306,907

(1) Less volume for final cover, liner and LCRS layers.
(2) Permitted Capacity as stated in facility Solid Waste Facility Permit 56-AA-0005.
(3) As of October 2020.

LANDFILL TONNAGE CAPACITY

	Total Capacity (tons)
Current Design (1)	16,376,046
Current Permitted (2)	N/A
Currently In-Place (3)	9,799,830
Remaining Capacity - Permitted (4)	N/A
Remaining Capacity - Design (5)	6,576,216

(1) Sum of "Currently In-Place" tons plus "Remaining Capacity – Design" tons.
(2) CUP tonnage limit, no longer in place
(3) Disposal tons received into the site since its initial operation in 1970 through October 2020.
(4) Difference between "Current Permitted" and "Currently In-Place" tons no longer needed as the site will fill to elevation 1435 amsl
(5) Based on "Remaining Net Capacity" of 7,306,907 cy (from Table 2A) and an assumed average compaction of 1800 lbs/cy

ATTACHMENT NO. 6: Draft Supplemental EIR for the Toland Optimization Plan

This document was previously distributed and can be found online at

https://www.vrsd.com/toland-optimization-plan/

Toland Optimization Plan

Final Supplemental Environmental Impact Report

State Clearinghouse No. 2018011026

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October 2020

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Appendix F 2040 General Plan Consistency

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1 Introduction

This Final Supplemental Environmental Impact Report (Final SEIR) is an informational document prepared by the Ventura Regional Sanitation District (VRSD) to evaluate the potential environmental impacts of the proposed Toland Optimization Plan (project or proposed project). The primary objectives of the SEIR process under the California Environmental Quality Act (CEQA) are to inform decision-makers and the public about a project's potentially significant environmental effects, identify feasible ways to minimize significant effects, and consider a reasonable range of alternatives to the project. The Final SEIR has been reviewed by VRSD staff for completeness and adequacy in accordance with Public Resources Code (PRC) Sections 21000–21177 and the California Environmental Quality Act (CEQA) Guidelines (Title 14 California Code of Regulations [CCR] Section 15000 et seq).

In accordance with CEQA Guidelines Sections 15153 and 16163, this SEIR is a supplemental CEQA analysis to the certified 1996 Final EIR (1996 FEIR), which was prepared for the Toland Road Landfill Expansion and Landfill Closure/Postclosure. The SEIR is prepared specifically for the Toland Optimization Plan. The Final SEIR, in conjunction with the 1996 FEIR comprise the CEQA documentation for the proposed Toland Optimization Plan. The SEIR becomes final upon certification by VRSD's decision-making body.

1.1 Final SEIR Contents

As prescribed by the CEQA Guidelines Sections 15088 and 15132, the lead agency, VRSD, is required to evaluate comments on environmental issues received from persons who have reviewed the Draft SEIR and to prepare written responses to those comments. This document, together with the Draft SEIR (incorporated by reference) comprise the Final SEIR for this project. This Final SEIR includes individual responses to each letter received during the public review period for the Draft SEIR. In accordance with CEQA Guidelines Section 15088(c), the written responses describe the disposition of significant environmental issues raised.

VRSD has provided a good faith effort to respond to all significant environmental issues raised by the comments. The Final SEIR also includes amendments to the Draft SEIR consisting of changes suggested by certain comments, as well as minor clarifications, corrections, or revisions to the Draft SEIR. The Final SEIR includes the following contents:

- Section 1: Introduction
- Section 2: Responses to Comments on the Draft SEIR; which also includes a list of all commenters and public comment letters
- Section 3: Errata to the Draft SEIR
- Appendices

1.2 Draft SEIR Public Review Process

According to CEQA, lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft SEIR.

1.2.1 Notice of Preparation and Project Scoping

On September 13, 2019, VRSD circulated a Notice of Preparation (NOP) of Draft SEIR for a 30-day period to identify environmental issue areas potentially affected if the proposed project were to be implemented. As discussed in Section 1.1 of the Draft SEIR, the NOP was posted with the County Clerk, mailed to public agencies, the State Clearinghouse, organizations, and individuals considered likely to be interested in the proposed project and its potential impacts, and posted in the local newspaper, the Ventura County Star. Comments received by VRSD on the NOP are summarized in Table 3 of the Draft SEIR. These comments were considered during the preparation of the Draft SEIR.

1.2.2 Public Review of the Draft SEIR

The Draft SEIR was made available for public review on July 24, 2020 and was distributed to local and State responsible and trustee agencies. Copies of the Notice of Availability of the Draft SEIR were mailed to a list of interested parties, groups and public agencies, as well as property owners and occupants of nearby properties. The Draft SEIR and an announcement of its availability were posted electronically on VRSD's website. The Notice of Availability of the Draft SEIR was also posted at the office of the Ventura County Clerk.

The 45-day CEQA public comment period began on July 24, 2020 and ended on September 7, 2020. VRSD received seven comment letters on the Draft SEIR prior to the close of the public comment period, and one comment letter after the close of the public comment period. Copies of all written comments received on the Draft SEIR are included in Section 2.0 of this document, as are responses to those comments.

1.3 SEIR Certification Process and Consideration of the Project

In accordance with the requirements of CEQA, and the procedures of VRSD, the SEIR must be certified as complete and adequate prior to any potential final action on the proposed project. Once the SEIR is certified and all information considered, using its independent judgment, VRSD can choose to take no action, or to take action to go forward with the proposed project, make changes, or select an alternative to the proposed project. While the information in the SEIR does not constrain VRSD's ultimate decision under its legal authority, VRSD must respond to each significant effect and mitigation measure identified in the SEIR, as required by CEQA, by making findings supporting its decision.

1.4 Draft SEIR Recirculation Not Required

CEQA Guidelines Section 15088.5 requires Draft EIR recirculation when "significant new information" is added to the Draft EIR, after the public review, but prior to EIR certification. Significant new information is defined as including:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR is so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The comments, responses, and Draft SEIR amendments presented in this document do not constitute such “significant new information;” instead, they clarify, amplify, or make insignificant modifications to the Draft SEIR. For example, none of the comments, responses, and Draft SEIR amendments disclose new or substantially more severe significant environmental effects of the proposed project, or new feasible mitigation measures or alternatives considerably different than those analyzed in the Draft SEIR that would clearly lessen the proposed project’s significant effects, but the project proponent declines to adopt it.

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2 Responses to Comments on the Draft SEIR

This section includes comments received during the circulation of the Draft SEIR prepared for the Toland Optimization Plan (project).

The Draft SEIR was circulated for a 45-day public review period that began on July 24, 2020 and ended on September 7, 2020. VRSD received seven comment letters on the Draft SEIR, and one additional letter received after the close of public review. The commenters and the page number on which each commenter's letter appear are listed below.

Letter No. and Commenter		Page No.
A	Theodore Tasiopoulos, Environmental Scientist, CalRecycle	10
B	Ramesh Bassiri, R.E.H.S, Ventura County Environmental Health Division	16
C	Mindy Fogg, Manager, Ventura County Planning Division	23
D	Sergio Vargas, Deputy Director, Ventura County Public Works	36
E	Nicole Collazo, Ventura County Air Pollution Control District	39
F	The Board of Trustees, Santa Clara Elementary School District	48
G	Dr. Jason Duque	53
Late Comments		
H	Norman Baculinao, Ventura County Public Works	60

In accordance with CEQA Guidelines Section 15088, the comment letters and CEQA Lead Agency responses follow. The comment letters have been lettered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The response to each comment identifies the letter of the comment letter, and the number assigned to each issue (Response A-1, for example, indicates that the response is for the first issue raised in comment Letter A).

Where a comment results in a change to the Draft SEIR text, a notation is made in the response indicating that the text is revised. Changes in text are indicated by strikeouts (~~**strikeouts**~~) where text is removed and by underlined font (**underlined font**) where text is added. These changes in text are also included in Section 3, *Errata to the Draft SEIR*.

2.1 Topical Responses

This section presents a detailed response to comments related to transportation, where commenters provided similar general statements of concern on this topic. Responses to specific comment letters may refer the commenter to the Topical Response presented herein.

As a general introduction, it should be noted that the SEIR's conclusions on the character and significance level of the project's potential to cause environmental impacts are supported by substantial evidence, which is presented in the Draft SEIR and Technical Appendices, and further clarified in this document. Some commenters may disagree with the analyses and conclusions in the

Draft SEIR. Consistent with the intent of CEQA, and the CEQA Guidelines for its implementation, this Final SEIR also includes the differing opinions and statements presented by the commenters.

Transportation 1 - Conflicts with Santa Clara Elementary School

Comments raise concerns regarding the proximity of the Santa Clara Elementary School to the State Route 126/Toland Road intersection, and potential conflicts between school traffic and other traffic.

The school is accessed from and situated along State Route 126, a State highway, and is near the intersection with Toland Road, a County owned road.

The school's inbound driveway is located approximately 550 feet west of the State Route 126/Toland Road intersection and the outbound right-turn only driveway is located approximately 250 feet west of the intersection. There is a "back-to-back" left-turn lane on State Route 126 that provides approximately 225 feet of storage for the eastbound left-turn from State Route 126 to Toland Road and 230 feet of storage for the westbound left-turn from State Route 126 to the school driveway. There is also a 110-foot eastbound right-turn lane on State Route 126 at the school's inbound driveway. In addition to the turn lanes, there are school crossing and slow trucks signs mounted on overhead flashers with school crossing pavement markings on both sides of the State Route 126/Toland Road intersection to alert motorists of the school zone and the truck activity at the intersection.

The existing CUP for the Toland Road Landfill (TRL) prohibits inbound trucks under TRL control from making a left-turn from State Route 126 onto Toland Road between 8:00-8:30 AM and between 2:30-3:00 PM in order to avoid conflicts with inbound school traffic in the back-to-back left-turn lane on State Route 126.

As noted in the Draft SEIR and Traffic Study (Appendix E), the additional MSW would be delivered by trucks consistent with the landfill's existing permitted hours of operation, which are Monday through Friday, from 6:00 a.m. to 4:00 p.m. Furthermore, the CUP condition would remain in place that prohibits inbound trucks under TRL control from making a left turn from State Route 126 onto Toland Road between 8:00 to 8:30 a.m. and between 2:30 and 3:00 p.m., to avoid conflicts with vehicles arriving and departing the Santa Clara School. It is anticipated that all of the trucks allowed under the modified CUP would be under TRL control, and subject to this restriction. Thus, the project would not add traffic in the left-turn lane during the school's drop-off and pick-up hours.

An increase in truck traffic is not, in and of itself, considered a significant impact under CEQA. Based on the analysis in the Draft SEIR, Section 4.4, *Transportation and Traffic*, impacts would be less than significant.

Transportation 2 - Traffic Capacity

Comments indicated that the left-turn lane on State Route 126 is currently inadequate and vehicles stack beyond the turn lane, and raise questions regarding the traffic capacity analysis methodology including the use of traffic volumes and hourly counts.

The traffic analysis for the intersection that is presented in the Draft SEIR follows the recommended practices of the County of Ventura. Traffic counts were collected at the intersection during the 6:00 to 9:00 a.m. peak commuter period and 4:00 to 6:00 p.m. peak commuter period. Using those traffic counts, the analysis identifies the peak 1-hour of traffic flows during the AM and PM peak commuter period. Those 1-hour volumes are then factored to represent the peak 15-minute traffic flows during the AM and PM peak commuter periods. Thus, the vehicle delays presented in the

Draft SEIR and traffic study represent the average vehicle delays during the peak 15-minute a.m. period and peak 15-minute p.m. period based on the data collected in the field. The average delays for turning left from State Route 126 onto Toland Road are about 22 seconds during the a.m. peak period and 15 seconds during the p.m. peak period, which meet the County's standards.

The field data show that the existing left-turn lane accommodates the existing left turn volumes, and would also accommodate the Existing + Project truck volumes. The left-turn lane includes about 225 feet of storage. The field data collected in 2019 show that 4 to 10 trucks per hour use the left-turn lane during the hours of operation for the TRL (6:00 a.m. to 4:00 pm). The counts also show 15 to 27 other types of vehicles per hour use the left-turn lane, during the hours of operation for the TRL. Thus, the existing volumes range between 18 to 34 vehicles per hour using the left-turn lane during the landfill's hours of operation. The counts show that 1 to 2 vehicles use the left-turn lane at any one time, and are accommodated within the left-turn lane.

The project would add 2 to 11 trucks per hour to the left-turn lane during the landfill's hours of operation, which would increase the flow rates to 20 to 45 vehicles per hour using the left-turn lane. During the busiest hour (10:00 to 11:00 AM), there would be a total of 45 vehicles during the hour – which equates to less than one per minute. The field counts and Existing + Project analysis shows that the left-turn lane would accommodates the existing left turns and the Existing + Project volumes. The left-turn queue was also forecast using the using the unsignalized level of service methodology outlined in the Highway Capacity Manual. This model also shows that the Existing and Existing + Project queues are accommodated within the left-turn lane.

It is noted that transportation improvements and operational constraints were implemented as a condition of the existing CUP, in response to these same issues and concerns raised in consideration of the Toland Road Landfill Expansion and Landfill Closure/Postclosure project under the 1996 FEIR. As a result of these conditions, numerous improvements were implemented, in conjunction with Caltrans and the County, including "Slow Trucks" signage warnings, "Landfill" signage warnings, and yellow flashing beacons, for east and west bound State Route 126 traffic; "Steep Grade – Trucks use Low Gear" signs on southbound Toland Road. In addition, TRL operates under a facility traffic hours restrictions program to eliminate TRL trips during school drop-off and pick up times. TRL has complied with this, and other conditions for over 20 years. As indicated in the traffic impacts analysis, the transportation facilities continue to meet capacity requirements.

It's also worth highlighting the performance of the transportation facilities related to the Toland Road Landfill during the recent Thomas Fire debris cleanup. From January 20, 2018 through June 30, 2018 the average number of truck trips to TRL increased to 267 per day, representing 115 more trucks than would be accommodated under the proposed project. As further explained in the Draft SEIR, this increase in truck trips to accommodate the Thomas Fire debris disposal was done pursuant to an emergency use authorization from CalOES, CalRecycle and the County of Ventura. During this same time, no major deficiencies were reported along State Route 126, or at the Toland Road intersection, and no accidents resulted from the increase in truck traffic. This further illustrates the ability of the existing transportation facilities to perform adequately and safely with an increase in truck traffic to the Toland Road Landfill.

Transportation 3 – Accidents

Comments express concern regarding near accidents and hazards at the intersection of State Route 126 and Toland Road.

The traffic analysis presented in the Draft SEIR includes an analysis of the accident history at the intersection, which is based on all traffic using the intersection throughout the day and night for a 3-year period. As noted therein, the rate of accidents was calculated for the intersection and then compared to the California statewide average for similar intersections to determine the relative safety at the intersection. There was one reported accident at the intersection during the 3-year period. The accident was a single vehicle crash that occurred during rainy conditions where the driver encountered loose material on the roadway, lost control, and hit a fixed object. There were no accidents related to school traffic entering and exiting the school. The results of the accident analysis found that the rate of accidents that occurred (0.03 accidents per million entering vehicles) is well below the California statewide average for similar intersections (0.16 accidents per million entering vehicles), and indicates that further investigation is not warranted.

The trip generation analysis completed for the project shows that the revised CUP would generate an additional 67 trucks per day which equates to 2 to 11 trucks per hour during the period when the landfill is open (6:00 a.m. to 4:00 p.m.), excluding the pick-up and drop-off times associated with the school. These traffic additions would not generate significant impacts to the intersection or roadway operations throughout the day.

State Route 126 includes two travel lanes and a right-turn lane in the westbound direction that were constructed to Caltrans standards (standard lane widths, deceleration and turn lane for right turns, striping, etc.). The area is flat and straight, which provides good inter-visibility between drivers traversing and/or turning at the intersection. Review of the collision histories found no accidents related to vehicles entering Toland Road from westbound State Route 126.

It's also worth highlighting the performance of the transportation facilities related to the Toland Road Landfill during the recent Thomas Fire debris cleanup. From January 20, 2018 through June 30, 2018 the average number of truck trips to TRL increased to 267 per day, representing 115 more trucks than would be accommodated under the proposed project. As further explained in the Draft SEIR, this increase in truck trips to accommodate the Thomas Fire debris disposal was done pursuant to an emergency use authorization from CalOES, CalRecycle and the County of Ventura. During this same time, no major deficiencies were reported along State Route 126, or at the Toland Road intersection, and no accidents resulted from the increase in truck traffic. This further illustrates the ability of the existing transportation facilities to perform adequately and safely with an increase in truck traffic to the Toland Road Landfill.

Transportation 4 – Cumulative Traffic Impacts

Comments indicate that future development and cumulative traffic affects are not evaluated.

Analyses of cumulative conditions required under CEQA are typically completed by assuming future approved and/or pending development projects in the study area (i.e. known development projects that are actively seeking approvals for ruling jurisdictions), which typically encompasses a three to five year horizon period for the cumulative projects to be approved and constructed.

As noted in the Draft SEIR, there are no cumulative projects proposed on Toland Road or on State Route 126 in the vicinity of Toland Road within the study area. Analyses of cumulative conditions required under CEQA are typically completed by assuming traffic that would be generated by future approved and/or pending development projects in the study area (i.e. known development projects that are actively seeking approvals for ruling jurisdictions), which typically encompasses a three to five year horizon period for the cumulative projects to be approved and constructed.

Since there are no cumulative projects proposed on Toland Road or on State Route 126 in the vicinity of Toland Road, the cumulative traffic forecasts used in the traffic study instead assumed continued growth on State Route 126 at historical rates. The use of growth factors to estimate future traffic volumes is a standard practice for traffic impact analysis. Historical counts on State Route 126 show that traffic has increased at a rate of 0.67 percent per year adjacent to Toland Road over the past 10 years. Thus, a 0.67 percent per year background growth factor was applied to the State Route 126 traffic volumes for a 5-year period to account for cumulative traffic growth in Ventura and Los Angeles counties.

California Environmental Protection Agency

Gavin Newsom
California Governor

Jared Blumenfeld
Secretary for Environmental Protection

Department of Resources Recycling and Recovery

Ken DaRosa
CalRecycle Acting Director

September 2, 2020

Chris Theisen, General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003

Subject: **SCH No. 2018011026** – Toland Optimization Plan, Draft Supplemental Environmental Impact Report, Toland Road Landfill (Facility No. 56-AA-0005), Ventura County

Dear Mr. Theisen:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The Ventura Regional Sanitation District (VRSD), acting as Lead Agency, has prepared and circulated a Draft Supplemental Environmental Impact Report (Draft SEIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

Toland Road Landfill (TRL) is located at 3500 Toland Road in unincorporated Ventura County, currently zoned Open Space. The project site is approximately 1.7 miles north of State Route 126, between the cities of Santa Paula and Fillmore. The Tax Assessor's parcel numbers for the property that comprises the 216.5-acre project site include 041-0-140-090, 041-0-140-100, and 041-0-140-235. Surrounding land uses within two miles of the landfill consist of open space, agricultural land (primarily avocado and citrus orchards) with related residences, a school (located on the opposite side of State Route 126), and a regional park.

A-1

The proposed project would request the following modifications to Conditional Use Permit (CUP) No. 3141:

(1) Remove the existing maximum permitted disposal rate of 1,500 tons per day (tpd) and replace it with a condition that allows a maximum daily tonnage to be based on the capacity of 152 heavy truck trips per day as evaluated in the 1996 Final EIR (FEIR);
(2) Allow TRL to be filled to its maximum elevation of 1,435 feet above mean sea level (amsl) as set forth in the current CUP;

(3) Remove the 2027 closure date;
(4) Remove the 15-million-ton lifetime cap; and
(5) Modify the CUP Conditions of Approval related to the decommissioned biosolids facility.

A-1

COMMENTS

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft SEIR, in addition to the specific location noted.

Page 41, Section 2.5, Project Characteristics – Will the proposed change of removing the existing maximum permitted disposal rate of 1,500 tpd and replacing it with a condition that allows a maximum daily tonnage to be based on the capacity of 152 heavy truck trips per day as evaluated in the 1996 FEIR for the current CUP be incorporated into the Solid Waste Facility Permit (SWFP) and Joint Technical Document (JTD)? Per Table 9 on page 45, Section 2.5.1, Landfill Capacity, 152 heavy truck trips per day equates to 2,864 TPD. What is the conversion factor for the tons per truck? Will TRL seek to incorporate 2,864 TPD as the new permitted tonnage? If so, this will need to be further explained per Title 27, California Code of Regulations (27 CCR), Section 21600(b)(2)(A), which requires a description of wastes proposed for acceptance and estimated waste volumes including daily average and peak daily waste flows as well as a five year projected waste flow.

Page 41, Section 2.5, Project Characteristics – Will the proposed change of removing the 2027 closure date be incorporated into the SWFP and JTD? If so, this will need to be further explained as to what the new estimated site life will be per 27 CCR, Section 21600(b)(3)(C), which requires an estimate of the site life based on the capacity of the site and the waste flow projections and assumptions regarding the compaction density used in life expectancy calculations.

A-2

Page 41, Section 2.5, Project Characteristics - Will the proposed change of removing the 15-million-ton lifetime cap be incorporated into the SWFP and JTD? If so, this will need to be further clarified per 27 CCR, Section 21600 (b)(3)(B) which requires calculations for volumetric capacity of the site expressed in cubic yards, net permitted capacity available for waste disposal, which include the amount of capacity consumed by soils used for liner construction, daily and intermediate cover, and final cover if included in the total capacity given. Topographic maps, including the delineation of the site property boundary and the disposal area used for the volumetric calculations and the date of survey shall be provided. The volumetric capacity calculations shall be certified by a registered civil engineer or registered geologist.

Joint Technical Document and Solid Waste Facilities Permit

The background information supporting the proposed changes of a maximum daily tonnage to be based on the capacity of 152 heavy truck trips per day, removal of the 2027 closure date, removal of the 15-million-ton lifetime cap, and any other changes

A-3

being made as a result of the proposed project must be submitted as an amendment to the JTD pursuant to 27 CCR, Section 21590.

Furthermore, a change to the disposal facility design or operation such as an increase in the permitted tonnage and change in design capacity at Toland Road Landfill are considered significant changes, and will require a revision to the SWFP. Prior to implementation of such a change, the operator shall submit an application package for a SWFP revision pursuant to 27 CCR, Section 21570 which shall be processed by the Local Enforcement Agency (LEA) pursuant to 27 CCR, Section 21650. **A-3**

The following internet link accesses checklists developed by CalRecycle staff as a guide to Lead Agencies in the preparation of environmental documents, such as for landfills:

http://www.calrecycle.ca.gov/SWFacilities/Permitting/CEQA/Documents/Guidance/Disposal.htm

Solid Waste Regulatory Oversight

The Ventura County Environmental Health Division is the LEA for Ventura County and responsible for providing regulatory oversight of solid waste handling activities, including inspections and permitting. Please contact the LEA, Sean Debley at 805.654.2813 or sean.debley@ventura.org to discuss the regulatory requirements for the proposed project. **A-4**

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the Final SEIR and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project. If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body. **A-5**

If you have any questions regarding these comments, please contact me at 916.341.6084 or by e-mail at Theodore.Tasiopoulos@calrecycle.ca.gov.

Sincerely,

Theodore Tasiopoulos, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Benjamin Escotto, Supervisor
Permitting & Assistance Branch – South Unit

Sean Debley, Manager
Ventura County LEA

Letter A

COMMENTER: Theodore Tasiopoulos, Environmental Scientist, CalRecycle

DATE: September 2, 2020

Response A-1

This comment provides introductory information describing the proposed project. This comment is acknowledged. This comment does not raise concerns pertaining to the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

Response A-2

This comment makes inquiries regarding the project characteristics, including CUP modifications, and provides guidance regarding the related solid waste facility permit (SWFP), and joint technical document (JTD).

The 1,500 tons per day (tpd) permitted disposal rate would be removed, and replaced with a condition that will allow the site to accept a maximum daily tonnage based on 152 total heavy trucks per day. Based on an average of 18.84 tons per truck, this results in up to 2,864 tons per day.

The proposed change of removing the 2027 closure date, and removing the 15-million-ton-lifetime cap will be incorporated into the both SWFP and the JTD. Based on the permitted maximum landfill elevation, the most current volumetric calculations, operational efficiency, and the amount of waste likely to be available to TRL, the remaining life expectancy is approximately 11 years.

Response A-3

This comment provides an overview of both the SWFP and JTD and how changes being made as a result of the proposed project may be considered as significant changes. The commenter states revision of the SWFP will be required.

This comment is acknowledged. Required changes, modifications or revisions to the SWFP and JTD will be made by VRSD as necessary. This comment does not raise concerns pertaining to the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

Response A-4

This comment states that the Ventura County Environmental Health Division is the Local Enforcement Agency of Ventura County, under State solid waste disposal facility laws, and is responsible for regulatory oversight. Therefore, permitting and inspections will be performed through Ventura County Environmental Health Division.

This comment is acknowledged. This comment does not raise concerns pertaining to the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

Response A-5

This comment thanks VRSD and requests copies of subsequent documents related to the project including any public notices or Notices of Determination. In addition, this comment requests that CalRecycle receive a notification regarding public hearings related to the project.

This comment is acknowledged. This comment does not raise concerns pertaining to the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

RESOURCE MANAGEMENT AGENCY
county of ventura

Environmental Health Division
Charles R. Genkel
Director

August 10, 2020

Chris Theisen
General Manager, Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003

Toland Optimization Plan RMA Ref# 18-001-1

Ventura County Environmental Health Division (Division) staff reviewed the information submitted for the abovementioned project.

Proposed project describes Ventura Regional Sanitation District's (VRSD) intent to modify the current Conditional Use Permit (CUP) for Toland Road Landfill (TRL) to reflect operational realities and to maximize an existing regional solid waste disposal capacity.

The proposal includes the following modifications to CUP No. 3141:

- Remove the existing maximum permitted disposal rate of 1,500 tpd (Condition 3.j) and replace it with a condition that allows a maximum daily tonnage to be based on the capacity of 152 heavy truck trips per day as evaluated in the 1996 Final EIR for the current CUP;
- Allow TRL to be filled to its maximum elevation of 1,435 feet amsl as set forth in the current CUP (Condition 5.a.2.a);
- Remove the 2027 closure date (Condition 5.a.2.b);
- Remove the 15-million-ton lifetime cap (Condition 5.a.2.c); and
- Modify the CUP Conditions of Approval related to the decommissioned biosolids facility (the CUP Modification request would not modify the approved final grades or boundary of the landfill, equipment used on site, or the type of waste accepted).

B-1

800 South Victoria Avenue, Ventura, CA 93009-1730 (805) 654-2813 FAX (805) 654-2480
Internet Web Site Address: www.vcrma.org/divisions/environmental-health

This Division reviewed this proposed project and provided a response with initial study comments and conditions of approval on February 8, 2018 (see Attachment 1). B-1

In addition to the CUP issued by the Ventura County Planning Division, TRL holds a solid waste facility permit issued by this Division as the Local Enforcement Agency (LEA) for solid waste facilities. Based on the Project Description, TRL would be required to submit various documents to the LEA including, but not limited to, the following: B-2

1) Application Package for a Solid Waste Facility Permit (SWFP) revision pursuant to 27 CCR, Section 21570;

2) An amendment to the Joint Technical Document (JTD) pursuant to 27 CCR, Section 21590;

3) Final CEQA information, determinations, environmental impact reports, etc.

For questions and guidance regarding LEA requirements for changes to a solid waste facility permit, please contact the Division's Solid Waste program staff specialist, Mike Villaraza, at (805) 654-2433 or Mike.Villaraza@ventura.org. Additional information may also be found at:

https://www.calrecycle.ca.gov/swfacilities/permitting/checklists/fullpermit

If you have any questions regarding this memo, please contact me at (805) 654-2830 or Ramesh.Bassiri@ventura.org.

Ramesh Bassiri, R.E.H.S.
Land Use Section
Environmental Health Division

Attachments:

1. Division Response Letter for Toland Road Landfill Optimization Plan NOP and Draft Initial Study dated February 8, 2018

RESOURCE MANAGEMENT AGENCY
county of ventura

Environmental Health Division
William C. Stratton
Director

February 8, 2018

Chris Theisen
General Manager, Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003

Toland Optimization Plan Draft Initial Study and Notice of Preparation of a Supplemental Environmental Impact Report, RMA Ref# 18-001

The Environmental Health Division (Division) reviewed information provided for a proposed project to modify Conditional Use Permit (CUP) No. 3141, Toland Road Landfill (TRL) and provides the following comments:

Proposed Modification #1- An increase of 300 tonnage per day (tpd) of waste received, increasing the maximum permitted daily tons from 1,500 tpd to 1,800 tpd. (Condition 3.j)

Division Response- Project description states the additional 300 tpd will be delivered by transfer trucks originating from Del Norte Recycling & Transfer Station or Gold Coast Recycling and Transfer Station…therefore all additional waste deliveries will be weighed at the transfer stations and certified weight tickets will be provided to the TRL scale house as opposed to being weighed on the TRL scales. Toland Landfill's 5-year review cited the need for a scale capable of weighing the large transfer trucks onsite, listed under VOL/TON section Bi-annual report of disposal tonnage and remaining site volume estimates. This Division will be adding a condition of approval requiring the addition of this scale to both address this existing deficiency, and to accommodate the additional transfer truck trips.

Proposed Modification #2- Removal of the 2027 closure date (Condition 5.a.2.b)

Division Response- This Division does not oppose removal of the 2027 closure date from the CUP, however, estimates of the life of the site will still be required for the Joint Technical Document (Report of Disposal Site Information (RDSI)) for the solid waste permit. Applicant is required to comply with California Code of Regulation (CCR) Title 27, Article 2. CalRecycle – Applicant Requirements, Section 21570-21640. CCR Title 27, Section 21600(b)(3)(C) Site Life Estimate requires the applicant to, "*Provide an estimate of the site life based on the capacity of the site and the waste flow projections, and assumptions regarding the compaction density used in life expectancy calculations. Include any other factors which may affect site life (e.g. local restrictions).*"

800 South Victoria Avenue, Ventura, CA 93009-1730 (805) 654-2813 FAX (805) 654-2480
Internet Web Site Address: www.vcrma.org/envhealth

Since this environmental document will also serve as the California Environmental Quality Act (CEQA) analysis for Toland's Report of Facility Information (RFI) amendment, the applicant should include this closure estimate as part of this review, clearly stating that the projected closure date is an estimate and may be adjusted over time as needed and with applicable supporting information.

Proposed Modification #3- Elimination of the 15-million-ton lifetime cap (Condition 5.a.2.c)

Division Response- This Division does not oppose removal of the 15-million-ton lifetime cap from the CUP, however, estimates of the maximum capacity will still be required for the Joint Technical Document (Report of Disposal Site Information (RDSI)) for the solid waste permit. The applicant must remain in compliance with CCR Title 27, Article 2. CalRecycle – Applicant Requirements, Section 21570 et. sec. CCR Title 27, Section 21600(b)(3)(B) Volumetric Capacity requires the applicant to, "*Provide calculations for volumetric capacity of the site expressed in cubic yards, net permitted capacity available for waste disposal, including the amount of capacity consumed by soils used for liner construction, daily and intermediate cover, and final cover, if included in the total capacity given. Attach topographic maps, including the delineation of the site property boundary and the disposal area used for the volumetric calculations and the date of survey. This information shall be certified by a registered civil engineer or registered geologist.*"

Since this environmental document will also serve as the CEQA analysis for Toland's SWFP permit revision, the applicant should include this estimate as part of this review, clearly stating that the calculated capacity is an estimate and may be adjusted over time as needed and with applicable supporting information.

Proposed Modification #4- Modify the Conditions of Approval related to the decommissioned biosolids facility.

Division Response- This Division does not oppose removal of the biosolids facility conditions.

In response to the proposed modifications, the following new conditions shall be submitted by this Division for inclusion in the Conditions of Approval of CUP 3141. Please note, this is not a comprehensive list of conditions:

1. **Solid Waste Permit – JTD Revision and Revised SWFP**
   Purpose: To comply with all applicable requirements in California Code of Regulations (CCR) Title 14 and Title 27, as well as Ventura County Ordinance Code section 4702. All site conditions and operations must conform to State solid waste laws and regulations.

Requirement: Permittee shall submit a revised Joint Technical Document (JTD) to Ventura County Environmental Health Division Local Enforcement Agency (LEA) and any other agency as specified in CCR Title 27, Article 2. CalRecycle – Applicant Requirements, Section 21570 et. sec., and shall obtain approval for a revised solid waste facility permit (SWFP). Permittee shall remain in compliance with all requirements specified in the SWFP. Permittee shall comply with all record keeping requirements specified in CCR Title 14, Section 17414.

Documentation: Permittee shall submit a revised JTD to the LEA and other applicable agency and obtain an approved revised SWFP. Permittee shall maintain, and make available for review to the LEA, all applicable records in one location and for a period of three years. Permittee shall submit a solid waste receipt questionnaire to report the volume and/or tonnage of waste received.

Monitoring and Reporting: Approval of the revised JTD and ongoing compliance with the SWFP shall be accomplished through routine reviews and field inspections conducted by LEA staff.

2. **Solid Waste Facility- Transfer Truck Scale**

Purpose: To provide accurate reports of wastes received by transfer trucks.

Requirement: Install a scale capable of weighing large transfer trucks bringing waste to the facility.

Timing: Scale shall be installed prior to facility accepting additional waste loads.

Monitoring and Reporting: Compliance shall be accomplished through routine reporting and field inspections conducted by Ventura County Environmental Health Division Local Enforcement Agency staff.

3. **Solid Waste Facility- WDR Compliance**

Purpose: To protect public health and the environment and remain in compliance with State Law regarding contaminated water discharges.

Requirement: Permittee shall notify the Regional Water Quality Control Board, Los Angeles region (LARWQCB) staff regarding proposed changes to facility operations, and comply with all Waste Discharge Requirements (WDR) permit adjustments imposed by LARWQCB. Contact Enrique Casas with LARWQCB at (213) 620-2299 for information on this process.

Timing: Permittee shall notify the LARWQCB during the solid waste review process.

Monitoring and Reporting: Compliance with the WDR's shall be enforced by the LARWQCB and reviewed by the Ventura County Environmental Health Division Local Enforcement Agency.

If you have any questions, please contact me at 805/654-2830.

Rebecca Lustig, M.S., R.E.H.S.
Technical Services Section
Environmental Health Division

c: Charles Genkel, Ventura County Environmental Health Division
Sean Debley, Ventura County Environmental Health Division
Sarah McGurk, Ventura County Planning Division
Anthony Ciuffetelli, Ventura County Planning Division
Megan Emslander, CalRecycle

Letter B

COMMENTER: Ramesh Bassiri, R.E.H.S, Ventura County Environmental Health Division

DATE: August 10, 2020

Response B-1

This comment provides introductory information, describing the proposed project, and indicating the Division's previously review of the initial study for the project in February 2018 (attached) therein).

Previous scoping comments are summarized, along with an explanation of how they are addressed, in Table 3 of the Draft SEIR, and include the above-referenced comment letter on the initial study. This comment does not pertain to the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

Response B-2

This comment identifies the Division as the Local Enforcement Agency for the TRL solid waste facility permit, identifies the documents that will need to be submitted to the Division, and provides an agency contact and website for further information.

This comment does not pertain to the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

RESOURCE MANAGEMENT AGENCY
county of ventura

Planning Division
Dave Ward, AICP
Director

September 4, 2020

Chris Theisen, General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003
Email: ChrisTheisen@vrsd.com

RE: Draft Supplemental EIR for the Toland Optimization Plan
Toland Road Landfill Major Modification to Conditional Use Permit (CUP) 3141
Case No. PL17-0121

Dear Mr. Theisen:

The Planning Division has reviewed the July 24, 2020 Draft Supplemental Environmental Impact Report (SEIR) for Major Modification to CUP 3141 (Case No. PL17-0121) ("Toland Optimization Plan").

The County of Ventura must make findings pursuant to, and in accordance with, Sections 21081, 21081.5, and 21081.6 of the Public Resources Code. In the County's role as a Responsible Agency for the CEQA document, the Planning Division provides the following comment:

- Consistency with the County's General Plan is evaluated throughout the Draft SEIR. However, a comprehensive update to the General Plan has just been completed. In the Final SEIR, please provide a thorough consistency analysis using the new 2040 General Plan.

C-1

If you have any questions about this letter, please contact Thomas Chaffee at (805) 654-2406 or thomas.chaffee@ventura.org.

Sincerely,

Mindy Fogg, Manager
Commercial and Industrial Permits Section
Ventura County Planning Division

Letter C

COMMENTER: Mindy Fogg, Manager, Ventura County Planning Division

DATE: September 4, 2020

Response C-1

This comment indicates the Planning Division has reviewed the Draft SEIR, and as a Responsible Agency for the project under CEQA, the County must make findings pursuant to Public Resources Code Sections 21081, 21081.5, and 21081.6. This comment further indicates that the project's consistency with the County's General Plan is evaluated throughout the Draft SEIR, and requests an updated evaluation based on the County's recently adopted 2040 General Plan.

The Planning Division's review and acknowledgement of the project's consistency with the County's General Plan as evaluated throughout the Draft SEIR is recognized. This analysis will be included in Appendix F to the Draft SEIR.

On September 15, 2020, the Ventura County Board of Supervisors adopted the 2040 General Plan, which will become effective on October 15, 2020. As requested, the project's consistency with the applicable Ventura County 2040 General Plan goals, policies, and programs is evaluated in Table 1. As demonstrated in the analysis below, the proposed project is substantially consistent with the County's 2040 General Plan.

Table 1 Project Consistency with the Ventura County 2040 General Plan

2040 General Plan Goal, Policy, or Program	Project Consistency
Goal LU-1: To ensure that the County can accommodate anticipated future growth and development while promoting orderly growth and development that enhances quality of life, maintains a safe and healthful environment, preserves valuable natural resources, and plans for adequate public facilities and services. **Goal LU-7:** To recognize and plan for low-density rural residential and recreational development, while preserving resources, avoiding hazards, and providing adequate public facilities and services.	**Consistent.** The project would expand the permitted disposal capacity of the TRL, without an expansion of the landfill footprint or substantial changes in landfill operations. This supports the County's goal of providing adequate public services (solid waste facilities).
Goal LU-4: To ensure that land uses are appropriate and compatible with each other and guide development in a pattern that will minimize land use conflicts between adjacent land uses. **Goal LU-5.** To promote the effective implementation and use of the General Plan Land Use Diagram. **Goal LU-6:** To provide appropriate land use designations that provide for the long-term preservation of the county's rural lifestyle, productive farmland and supporting services, and the vast open space resources that define the county.	**Consistent.** The project does not modify the existing land use or zoning of the project site or introduce a new land use conflicts. The project site is in an Open Space (OS) Zone, which includes landfills as a legitimate and proper use of OS land in the county, and as an essential public facility providing service to the county.

2040 General Plan Goal, Policy, or Program	Project Consistency
Policy CTM-1.1: Vehicle Miles Traveled (VMT) Standards and CEQA Evaluation. The County shall require evaluation of County General Plan land use designation changes, zone changes, and discretionary development for their individual (i.e., project-specific) and cumulative transportation impacts based on Vehicle Miles Traveled (VMT) under the California Environmental Quality Act (CEQA) pursuant to the methodology and thresholds of significance criteria set forth in the County Initial Study Assessment Guidelines. **Goal CTM-4:** To ensure that land use and transportation planning efforts in the county are cohesive, mutually supportive, and reduce Vehicle Miles Traveled (VMT) per capita within the unincorporated areas of the County.	**Consistent.** Impact T-1 in Section 4.4, *Transportation*, determined that the project would result in less than significant impacts to VMT, as the project would result in decreased VMT (Draft SEIR, pp. 124-125). The project would result in a redirection of existing truck trips from Simi Valley Landfill to TRL. However, TRL is closer to the transfer stations—located in Ventura and Oxnard—than Simi Valley Landfill, which would result in a net reduction in VMT. Similarly, the project's net reduction in VMT would not contribute to cumulative County VMT impacts.
Policy CTM-1.3: County Level of Service (LOS) Standards. The County shall maintain LOS standards for use as part of the County's transportation planning including the traffic impact mitigation fee program, and the County's review and consideration of proposed land use legislation and discretionary development. For purposes of County transportation planning and review and consideration of proposed land use legislation and discretionary development, the County shall use the following minimum acceptable Level of Service (LOS) for road segment and intersection design standards within the Regional Road Network and all other County-maintained roadways: a. LOS-'C' for all Federal functional classification of Minor Collector (MNC) and Local roadways (L); and b. LOS-'D' for all Federal functional classifications except MNC and L, and Federal and State highways in the unincorporated area, except as otherwise provided in subparagraph (c and d); c. LOS-'E' for State Route 33 between the northerly end of the Ojai Freeway and the city of Ojai, Santa Rosa Road, Moorpark Road north of Santa Rosa Road, State Route 34 north of the city of Camarillo, and State Route 118 between Santa Clara Avenue and the city of Moorpark; d. LOS 'F' for Wendy Drive between Borchard Drive to Lois Avenue; and e. The LOS prescribed by the applicable city for all federal highways, state highways, city thoroughfares and city-maintained local roads located within that city, if the city has formally adopted and is implementing a General Plan policy, ordinance, or a reciprocal agreement with the County regarding development in the city that is intended to improve the LOS of County-maintained local roads and federal and state highways located within the unincorporated area of the county. f. At any intersection between two or more roads, each of which has a prescribed minimum acceptable LOS, the lower LOS of the roads shall be the minimum acceptable LOS for that intersection.	**Consistent.** Section 4.4, *Transportation*, and a traffic study completed in February 2020 and included in Appendix E, discussed LOS and roadway capacity effects, in accordance with County and Caltrans requirements. The project would allow an additional 67 truck trips per day access to the TRL, as previously evaluated in the 1996 FEIR. The Draft SEIR indicates the proposed project would cause no change in LOS under existing plus project conditions or future plus project conditions (Draft SEIR pp. 128-135). The project would not exceed the County's LOS standards or conflict with the County's LOS policies (Ibid.).

2040 General Plan Goal, Policy, or Program	Project Consistency
CTM-1.4 Level of Service (LOS) Evaluation County General Plan land use designation changes and zone changes shall be evaluated for their individual (i.e., project-specific) and cumulative effects, and discretionary developments shall be evaluated for their individual effects, on Level of Service (LOS) on existing and future roads, to determine whether the project: a. Would cause existing roads within the Regional Road Network or County-maintained roadways that are currently functioning at an acceptable LOS to function below an acceptable LOS; b. Would add traffic to existing roads within the Regional Road Network or County-maintained roadways that are currently functioning below an acceptable LOS; and c. Could cause future roads planned for addition to the Regional Road Network or County-maintained roadways to function below an acceptable LOS. d. The Level of Service (LOS) evaluation shall be conducted based on methods established by the County.	
Policy CTM-2.2: Functional Classification. The County shall plan a roadway system that has adequate capacity and is designed to provide reasonable and safe use by vehicles, public transportation, bicycles and pedestrians with minimum delay pursuant to LOS standards described in Policy CTM-1.2. The road system should follow Federal Highway Administration (FHWA) classification as identified on Figure 4-4. **Policy CTM-2.27: Discretionary Development and Conditions of Approval to Minimize Traffic Impacts.** The County shall require that discretionary development be subject to permit conditions of approval, where feasible, to minimize traffic impacts by incorporating pedestrian and bicycle pathways, bicycle racks and lockers, ridesharing programs, transit improvements (bus turnouts, shelters, benches), and/or transit subsidies for employees or residents of the proposed development. **Policy CTM-3.10: Bicycle Storage Facilities.** The County shall require adequate bicycle storage facilities (e.g., bicycle racks, lockers) for discretionary development as determined by allowable land uses at a given site.	**Consistent.** Impact T-4 in Section 4.4, *Transportation*, of the Draft SEIR, determined that the project would result in less than significant impacts from conflicts with adopted plans, policies, or programs regarding public transit, bikeways, and pedestrian facilities, as the project would not change existing roadway infrastructure or disrupt public transit, bicycle, and pedestrian usage of existing facilities (Draft SEIR, p. 127). Refer to the consistency analysis with Policies CTM-1.3 and CTM-1.4 above regarding LOS. The project would introduce additional truck trips to the TRL, and the nature of the project (increased daily solid waste disposal capacity) would not result in a change in bicycle trips, pedestrian activity, or the demand for local transit facilities in relation to the project site. Therefore, it is not necessary for the project to provide additional transit, pedestrian, or bicycle facilities at the site.

2040 General Plan Goal, Policy, or Program	Project Consistency
Policy CTM-2.3: County Road Access. The County shall require discretionary development with access onto a County road to have the access point(s) designed and built to County standards. **Policy CTM-2.5: Emergency Services.** The County shall coordinate the development and maintenance of all transportation facilities with emergency service providers to ensure continued emergency service operation and service levels. **Policy CTM-2.28: Emergency Access.** The County shall ensure that all new discretionary projects are fully evaluated for potential impacts to emergency access. Mitigation of these impacts shall be handled on a project-by-project basis to guarantee continued emergency service operations and service levels. **Goal HAZ-12:** To provide for the safe and efficient evacuation of residents in times of need.	**Consistent.** Impact T-3 in Section 4.4, *Transportation*, of the Draft SEIR determined that the project would not impair emergency access, as the project would not involve change to the site's access roadways and the additional truck trips would not substantially increase traffic delays (Draft SEIR, p. 127). The Initial Study Checklist (provided in Appendix A to the Draft SEIR) also determined that the project would not impair an adopted emergency response or evacuation plan, as it would not modify the approved final grades of the landfill, equipment used on site, or type of waste accepted.
Policy CTM-2.4: Transportation System Safety. The County shall strive to provide safe operating conditions for all appropriate modes and uses of County roadways. **Policy CTM-2.19: Safety Metrics.** The County shall continue to examine and update safety metrics for California Environmental Quality Act (CEQA) impact analysis as appropriate. Options include but are not limited to: queue spill-back at intersections; mid-block unprotected crossings; and, increased crossing distances.	**Consistent.** Impact T-2 in Section 4.4, *Transportation,* of the Draft SEIR describes potential impacts due to design features or incompatible uses (Draft SEIR, pp. 125-127). The project would not result in traffic queues that could not be accommodated by the existing turn lanes. The accident rate at State Route 126 and Toland Road is below the statewide average and does not warrant further investigation of roadway safety improvements. Similarly, the existing signage and safety features at the State Route 126 and Toland Road intersection are adequate for the increase in daily trips resulting from the project, and no new traffic hazards would be introduced.
Policy CTM-2.29: Railroad Safety Assessment. The County shall require that all new discretionary development is evaluated for potential impacts to existing railroad facilities and operations and identify appropriate mitigation measures, as warranted therein.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have no effect on local railroads. There are no railroads within 0.5 mile of the site, and railroad operations would not be affected by operation of the project, as proposed activities would be contained within the site.
Policy CTM-6.5: Electric Vehicle Charging Stations. The County shall support the installation of electric vehicle charging stations, where feasible, at County facilities, parking lots, park-and-ride lots, truck stops, and new development.	**Not Applicable.** While the project would increase truck trips to the TRL, these vehicles would not spend time parked at the facility, as they would travel to the site only for the purpose of unloading solid waste material before leaving.
Policy CTM-7.2: Local Funding Mechanisms. The County shall continue to use local financing mechanisms such as gas tax, vehicle registration fees, and Traffic Impact Mitigation Fees to help fund transportation projects. The County shall continue to support regional and county-wide measures for transportation funding.	**Consistent.** Section 2, *Project Description*, of the Draft SEIR states: "[w]hile VRSD is exempt from the County's traffic Impact Mitigation Fee Ordinance 4071 as a public agency, VRSD agreed to make a payment equivalent to the fee that would be required under Ordinance 4071 to mitigate the cumulative traffic impacts to the regional road network from the project," (Draft SEIR, p. 57). Therefore, the project would support the County's Traffic Impact Mitigation Fee program and regional transportation projects.

2040 General Plan Goal, Policy, or Program	Project Consistency
Goal PFS-5: To maximize recycling, reuse, and composting of solid waste and ensure the safe handling and disposal of the remaining solid and hazardous waste.	**Consistent.** The TRL accepts municipal solid waste. TRL facility operations and safety procedures, are in compliance with state and local guidelines for the handling and disposal of solid waste. The TRL does not handle or accept hazardous waste.
Goal COS-1: To identify, preserve, protect, and restore sensitive biological resources, including federal and state-designated endangered, threatened, rare, or candidate species and their supporting habitats; wetland and riparian habitats; coastal habitats; habitat connectivity and wildlife corridors; and habitats and species identified as "locally important" by the County.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have no effect on biological resources. A biological resources assessment for the TRL 1996 FEIR concluded no special-status or sensitive species occurred in the project area and no biological resource impact would occur. The project would not expand the physical footprint of the landfill.
Policy COS-1.3: Wildlife Corridor Crossing Structures. Based on the review and recommendation of a qualified biologist, the design and maintenance of road and floodplain improvements, including culverts and bridges, shall incorporate all feasible measures to accommodate wildlife passage. **Policy COS-1.4: Consideration of Impacts to Wildlife Movement.** When considering proposed discretionary development, County decision-makers shall consider the development's potential project-specific and cumulative impacts on the movement of wildlife at a range of spatial scales including local scales (e.g., hundreds of feet) and regional scales (e.g., tens of miles). **Policy COS-1.5: Development Within Habitat Connectivity and Wildlife Corridors.** Development within the Habitat Connectivity and Wildlife Corridors overlay zone and Critical Wildlife Passage Areas overlay zone shall be subject to the applicable provisions and standards of these overlay zones as set forth in the Non-Coastal Zoning Ordinance.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect on habitat connectivity, as there are no significant mapped landscape linkages or wildlife movement corridors on the project site, and the project does not involve any expansion of the landfill footprint. While truck trips could create noise that could intimidate wildlife and cause relocation, adherence to existing Conditions of Approval would reduce this potential impact to less than significant.
Policy COS-1.10: Evaluation of Potential Impacts of Discretionary Development on Wetlands. The County shall require discretionary development that is proposed to be located within 300 feet of a wetland to be evaluated by a County-approved biologist for potential impacts on the wetland and its associated habitats pursuant to the applicable provisions of the County's Initial Study Assessment Guidelines.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have no effect on wetlands, as the project would not modify the approved final grades of the landfill or expand the landfill into wetland or riparian areas. There is no wetland within 300-feet of the TRL footprint.
Goal COS-3: To preserve, protect, and enhance the unique scenic resources in Ventura County, and ensure access to scenic resources within Ventura County for present and future generations. **Policy COS-3.1: Scenic Roadways.** The County shall protect the visual character of scenic resources visible from state or County designated scenic roadways.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect on scenic resources. The project site is visible from a public viewing location (State Route 126); however, existing Conditions of Approval require continued maintenance of landscape screening. The project would not expand the landfill footprint or modify finished grades such that scenic resources or public views would be affected.

2040 General Plan Goal, Policy, or Program	Project Consistency
Goal COS-4: To identify, inventory, preserve and protect cultural, historical, paleontological, and archaeological resources in Ventura County, including Native American resources, for their scientific, educational, and cultural value.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect on cultural, historical, paleontological, and archaeological resources. The TRL 1996 FEIR included an archaeological study, and determined the project site is not located on an area of known paleontological importance. Existing Conditions of Approval require paleontological monitoring and implementation of a Resource Protection Program. The project would not modify the TRL's approved limits of operation and therefore would not affect archaeological or historical resources.
Goal COS-5: To preserve and protect soil resources in the county from erosion and for agricultural productivity.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have no effect on agricultural resources, as the project site is an operating landfill not located on important farmland and not incompatible with nearby agricultural productivity. The project does not involve any landfill expansion, and thus would not impact soils designated as important farmland, or existing agricultural land. The Initial Study Checklist (provided in Appendix A to the Draft SEIR) also determined the project would not result in erosion hazards, as the project would not involve new soil disturbance or modification of the landfill grades.
Goal COS-6: To manage mineral resources in a manner that identifies economically significant mineral deposits and plans for and protects access to, extraction, and long-term conservation of mineral resources for existing and future generations.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have no effect on mineral resources, as the project site is not located on or adjacent to a mineral resource zone or near a mineral resource extraction access road.
Goal COS-8: To minimize energy consumption and increase the use of renewable energy.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have no effect on energy consumption. The project would not alter the equipment used on site or modify energy consumption at the landfill. Fuel consumption related to trips to TRL would increase due to increased truckloads per day to the TRL; however, the overall energy consumption associated with movement of solid waste would decrease due to the reduction in VMT achieved by the project.

2040 General Plan Goal, Policy, or Program	Project Consistency
Goal COS-10: To improve the long-term sustainability of the community through local efforts to reduce greenhouse gas (GHG) emissions	**Consistent.** As discussed in Section 4.2, *Greenhouse Gas Emissions*, of the Draft SEIR, waste that would be accepted by TRL under the project is already being generated in the western Ventura County wasteshed (Draft SEIR, pp. 92-94). Currently, this waste is being delivered to other landfills further from the source of its generation, such as the Simi Valley Landfill. While the project would increase the amount of waste accepted at TRL, it would have no effect on waste generation rates and, therefore, would not affect overall GHG emissions associated with municipal solid waste decomposition in the western Ventura County wasteshed. Furthermore, one of the project's objectives is to maximize in-county waste disposal capacity at TRL to minimize travel distances and related air pollutant and GHG emissions from waste hauling vehicles. As discussed in Section 4.4, *Transportation*, of the Draft SEIR, delivery to TRL instead of the Simi Valley Landfill for waste generated in Oxnard and Ventura would result in a net reduction in VMT, and associated fossil fuel use, related to waste hauling activities in the wasteshed (Draft SEIR, pp. 124-125). This would lead to a net decrease in GHG emissions from waste hauling in the county by a minimum of 649 metric tons (MT) of carbon dioxide equivalents (CO_2e) per year and a maximum of 17,035 MT of CO_2e per year (Draft SEIR, pp. 92-94). Therefore, the project would assist local efforts to reduce GHG emissions and improve the long-term sustainability of the community.
Policy COS-10.2: Community Greenhouse Gas Emissions Reduction Target for 2030. The County shall work toward achieving a community-wide GHG emissions reduction target of 41 percent below 2015 levels by 2030.	**Consistent.** As discussed under Goal COS-10, the project would not affect overall GHG emissions associated with municipal solid waste decomposition in the western Ventura County wasteshed and would result in a net reduction in GHG emissions from waste hauling in the county by a minimum of 649 MT of CO_2e per year and a maximum of 17,035 MT of CO_2e per year (Draft SEIR, pp. 92-94). Therefore, the project would contribute toward the County's goal of achieving a community-wide GHG emissions reduction target of 41 percent below 2015 levels by 2030.
Policy COS-10.3: Community Greenhouse Gas Emissions Reduction Goals for 2040 and 2050. The County shall work toward achieving longer-term, post-2030 community-wide GHG emissions reduction goals, as follows: ▪ 61 percent below 2015 levels by 2040, and ▪ 80 percent below 2015 levels by 2050.	**Consistent.** As discussed under Goal COS-10, the project would not affect overall GHG emissions associated with municipal solid waste decomposition in the western Ventura County wasteshed and would result in a net reduction in GHG emissions from waste hauling in the county by a minimum of 649 MT of CO_2e per year and a maximum of 17,035 MT of CO_2e per year (Draft SEIR, pp. 92-94). Therefore, the project would contribute toward the County's longer-term, post-2030 community-wide GHG emissions reduction goals.

2040 General Plan Goal, Policy, or Program	Project Consistency
Policy COS-10.4: Greenhouse Gas Reductions in Existing and New Development. The County shall reduce GHG emissions in both existing and new development through a combination of measures included in the GHG Strategy, which includes new and modified regulations, financing and incentive-based programs, community outreach and education programs, partnerships with local or regional agencies, and other related actions.	**Consistent.** As discussed under Goal COS-10, the project would not affect overall GHG emissions associated with municipal solid waste decomposition in the western Ventura County wasteshed and would result in a net reduction in GHG emissions from waste hauling in the county by a minimum of 649 MT of CO_2e per year and a maximum of 17,035 MT of CO_2e per year (Draft SEIR, pp. 92-94). Therefore, the project would contribute toward reducing GHG emissions associated with waste hauling trips generated by existing development.
Goal HAZ-1: To improve the resilience of the County to wildfire risk by locating, designing, and constructing development in a manner that minimizes the risk, and by providing effective fire prevention, suppression, and rescue services and facilities. **Policy HAZ-1.1: Fire Prevention Design and Practices.** The County shall continue to require development to incorporate design measures that enhance fire protection in areas of high fire risk. This shall include but is not limited to incorporation of fire-resistant structural design, use of fire-resistant landscaping, and fuel modification around the perimeter of structures.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect on fire hazards. While the site is in a very high fire hazard area, existing Conditions of Approval require that all structures meet hazardous fire area building code requirements. The project does not modify the approved final grades of the landfill and would not exacerbate fire hazards in the area.
Goal HAZ-2: To minimize the loss of life, injury, property damage, and economic and social dislocations resulting from flooding, dam failure, seismic-induced flooding, post-fire debris flow, tsunamis, or other water inundation hazard.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect on flooding, as the project would not increase impervious surfaces and TRL maintains an on-site basin that captures stormwater runoff. The TRL is located outside the 100- and 500-year floodplains. The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would result in no impact from seiche or tsunami hazards. The project site is not located near a body of water that could result in a seiche and is not within a tsunami inundation zone.
Goal HAZ-4: To minimize the risk of loss of life, injury, collapse of habitable structures, and economic and social dislocations resulting from geologic and seismic hazards.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect from seismic hazards. There are no active faults through the project site and the project does not propose habitable structures. The project would not modify the landfill liners or increase slope instability.
Goal HAZ-5: To minimize the risk of loss of life, injury, serious illness, damage to property, and economic and social dislocations resulting from the use, transport, treatment and disposal of hazardous materials and wastes.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect from hazardous materials. The project would not modify the approved final grades or types of waste accepted. Compliance with state and local regulations and existing Conditions of Approval would continue to minimize the risk from the use, transport, treatment, and disposal of hazardous materials. TRL would continue to not accept hazardous waste under the project.

2040 General Plan Goal, Policy, or Program	Project Consistency
Goal HAZ-9: To protect the health, safety, and general welfare of county residents by striving to eliminate or avoid the adverse noise impacts on existing and future noise sensitive uses. **Policy HAZ-9.7: Noise Control Priorities.** The priorities for noise control for discretionary development shall be as follows: 1. Reduction of noise emissions at the source. 2. Attenuation of sound transmission along its path, using barriers, landform modification, dense plantings, building orientation and placement, and the like. 3. Rejection of noise at the reception point using noise control building construction, hearing protection or other means.	**Consistent.** As discussed in Section 4.3, *Noise*, of the Draft SEIR, project-related waste hauling trips would increase roadway noise levels along Toland Road and State Route 126. However, project-related traffic would not increase ambient noise levels by more than 3 dBA and would not cause ambient noise levels to exceed the County's outdoor noise level standard of 60 CNEL, for residences and schools, under existing plus project and cumulative plus project conditions. As such, the project's roadway noise impacts would not exceed the limits established in Policy HAZ 9.8. Additionally, as diesel engine technology improves over time, quieter diesel truck engines would be used in future years as fleets are aged out and upgraded. Therefore, the project would not result in adverse noise impacts on existing noise-sensitive uses.
Policy HAZ-9.1: Limiting Unwanted Noise. The County shall prohibit discretionary development which would be impacted by noise or generate project-related noise which cannot be reduced to meet the standards prescribed in Policy HAZ-9.2. This policy does not apply to noise generated during the construction phase of a project.	**Not applicable.** The project does not propose noise-sensitive land uses or stationary noise generators. In addition, the project does not include construction and demolition activities. Therefore, the standards prescribed in Policy HAZ-9.2 are not applicable to the proposed project.
Policy HAZ-9.2: Noise Compatibility Standards. The County shall review discretionary development for noise compatibility with surrounding uses. The County shall determine noise based on the following standards: 1. New noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed CNEL 60 or Leq1H of 65 dB(A) during any hour. 2. New noise sensitive uses proposed to be located near railroads shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed L10 of 60 dB(A) 3. New noise sensitive uses proposed to be located near airports: a. Shall be prohibited if they are in a Community Noise Equivalent Level (CNEL) 65 dB or greater, noise contour; or b. Shall be permitted in the Community Noise Equivalent Level (CNEL) 60 dB to CNEL 65 dB noise contour area only if means will be taken to ensure interior noise levels of CNEL 45 dB or less. 4. New noise generators, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor,	**Not applicable.** The project does not propose noise-sensitive land uses or stationary noise generators. In addition, the project does not include construction and demolition activities.

2040 General Plan Goal, Policy, or Program	Project Consistency
measured at the exterior wall of the building, does not exceed any of the following standards: a. Leq1H of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.; b. Leq1H of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.; and c. Leq1H of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m. 5. Construction noise and vibration shall be evaluated and, if necessary, mitigated in accordance with the Construction Noise Threshold Criteria and Control Plan (Advanced Engineering Acoustics, November 2005)	
Policy HAZ-9.8: Implement Noise Control Measures for Traffic Noise. The County shall require noise control measures to be implemented along roadways for new discretionary development generating traffic noise if either of the following circumstances would exist: ▪ The discretionary development would result in traffic noise levels above a County noise compatibility standard stated in Policy HAZ 9.2 in an area where traffic noise levels, under existing conditions, do not exceed the County noise compatibility standard; or, ▪ The discretionary development would result in an increase in traffic noise levels of 3 dBA or greater in an area where traffic noise levels under existing conditions exceed a County noise compatibility standard stated in Policy HAZ 9.2. Noise control measures may include increased vegetation, roadway pavement improvements and maintenance, and site and building design features. If such measures are not sufficient to reduce a new discretionary development's fair-share of traffic-generated noise at sensitive receptors, a sound wall barrier may be constructed. All feasible noise reduction measures shall be implemented to ensure the development's fair-share of traffic-generated noise is reduced, consistent with Policy HAZ 9.2.	**Consistent.** As discussed under Goal HAZ-9, project-related traffic would not cause ambient noise levels to exceed the County's outdoor noise level standard of 60 CNEL for residence in areas where existing traffic noise levels do not exceed the County's noise compatibility standard under existing plus project and cumulative plus project conditions. In addition, at Santa Clara Elementary School where existing traffic noise levels exceed the County's outdoor noise level standard of 60 CNEL, the project would not increase ambient noise levels by more than 3 dBA. Additionally, as diesel engine technology improves over time, quieter diesel truck engines would be used in future years as fleets are aged out and upgraded. Therefore, noise control measures are not necessary.
Goal HAZ-10: To promote a high level of air quality in order to protect public health, safety, and welfare, and mitigate any adverse air quality impacts to the maximum extent feasible.	**Consistent.** As discussed under Goal COS-10, the project would result in a net reduction in VMT associated with waste hauling trips in the county, which would result in a net reduction in criteria air pollutant emissions. Therefore, the project would not result in any adverse air quality impacts.
Policy HAZ-10.1: Air Pollutant Reduction. The County shall strive to reduce air pollutants from stationary and mobile sources to protect human health and welfare, focusing efforts on shifting patterns and practices that contribute to the areas with the highest pollution exposures and health impacts.	**Consistent.** As discussed under Goal COS-10, the project would result in a net reduction in VMT associated with waste hauling trips in the county, which would result in a net reduction in criteria air pollutant emissions. Therefore, the project would contribute to the County's policy of reducing air pollutant emissions from mobile sources.

2040 General Plan Goal, Policy, or Program	Project Consistency
Policy HAZ-10.2: Air Quality Management Plan Consistency. The County shall prohibit discretionary development that is inconsistent with the most recent adopted Air Quality Management Plan (AQMP), unless the Board of Supervisors adopts a statement of overriding considerations.	**Consistent**. As discussed in Section 4.1, *Air Quality,* of the Draft SEIR, the project would be consistent with the 2016 AQMP because it would not cause an exceedance of the growth projections that underlie the AQMP air pollutant emission forecasts.
Policy HAZ-10.3: Air Pollution Control District Rule and Permit Compliance. The County shall ensure that discretionary development subject to Ventura County Air Pollution Control District (VCAPCD) permit authority complies with all applicable APCD rules and permit requirements, including the use of Best Available Control Technology (BACT) as determined by the VCAPCD.	**Consistent**. The project would comply with VCPACD rules as they pertain to the proposed project.
Policy HAZ-10.9: Mitigation of Objectionable Odors. The County shall require that discretionary development which will create objectionable odors that could affect a substantial number of people are appropriately mitigated. The project, pursuant to state law, shall be required to operate in accordance with the Rules and Regulations of the Ventura County Air Pollution Control District (VCAPCD), with emphasis on Rule 51, Nuisance throughout the life of the permit.	**Consistent**. As discussed in Section 4.1, *Air Quality*, of the Draft SEIR, the TRL currently addresses odors from existing landfill operations through daily cover controls and best management practices. The proposed project does not include expanding the landfill footprint, or altering operations; therefore, substantial changes in odor emissions from landfill operations are not be expected. Odors from engine exhaust from the additional heavy trucks accessing the site could be considered objectionable. However, these odors would be transitory in nature, as heavy trucks would be in transit towards the landfill and would not idle in public areas. Therefore, the project would not create objectionable odors that could affect a substantial number of people.
Policy HAZ-10.11: Air Quality Assessment Guidelines. In evaluating air quality impacts, the County shall consider total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act. The County shall evaluate discretionary development for air quality impacts using the Air Quality Assessment Guidelines as adopted by the Ventura County Air Pollution Control District (APCD), except that emissions from APCD-permitted sources shall also be included in the analysis. The County shall revise the Initial Study Assessment Guides to implement this policy.	**Consistent**. Section 4.1, *Air Quality*, of the Draft SEIR evaluates the project's air quality impacts using VCAPCD (2003) Ventura County Air Quality Assessment Guidelines.
Policy HAZ-10.12: Conditions for Air Quality Impacts. The County shall require that discretionary development that would have a significant adverse air quality impact shall only be approved if it is conditioned with all feasible mitigation measures to avoid, minimize or compensate (offset) for the air quality impact. The use of innovative methods and technologies to minimize air pollution impacts shall be encourage in project design.	**Not applicable**. As discussed in Section 4.1, *Air Quality*, the project would have less than significant impacts to air quality. Therefore, conditions for feasible mitigation measures are not necessary.
Policy HAZ-10.13: Construction Air Pollutant Best Management Practices. Discretionary development projects that will generate construction-related air emissions shall be required by the County to incorporate best management practices (BMPs) to reduce emissions. These BMPs shall include the measures recommended by VCAPCD in its Air Quality Assessment Guidelines or otherwise to the extent applicable to the project.	**Not applicable.** The project does not propose construction activities.

2040 General Plan Goal, Policy, or Program	Project Consistency
Policy HAZ-10.14: Fugitive Dust Best Management Practices. The County shall ensure that discretionary development which will generate fugitive dust emissions during construction activities will, to the extent feasible, incorporate appropriate BMPs to reduce emissions to be less than applicable thresholds.	**Not applicable.** The project does not propose construction activities.
Goal WR-1: To effectively manage water supply by adequately planning for the development, conservation, and protection of water resources for present and future generations. **Goal WR-2:** To implement practices and designs that improve and protect water resources. **Goal WR-3:** To promote efficient use of water resources through water conservation, protection, and restoration. **Goal WR-4:** To maintain and restore the chemical, physical, and biological integrity and quantity of groundwater resources.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect on water quality as well as groundwater supply and quality, because the project would not result in the extraction of groundwater, create a new demand for water, or exceed water quality objectives.

Source: County of Ventura 2040 General Plan

PUBLIC VENTURA COUNTY WORKS

WATERSHED PROTECTION
WATERSHED PLANNING AND PERMITS DIVISION
800 South Victoria Avenue, Ventura, California 93009
Sergio Vargas, Deputy Director – (805) 650-4077

M E M O R A N D U M

DATE: July 29, 2020

TO: Anthony Ciuffetelli, RMA Planner
Ventura County

FROM: Sergio Vargas, Deputy Director S.V.

SUBJECT: RMA18-001Toland Optimization Plan
APN(s): 041 0 140 090, 041-0-140-100, and 041-0-140-235
Zone 2
Watershed Protection District Project Number: WC2018-002
COMPLETE

Pursuant to your request dated July 24, 2020, this office has reviewed the submitted materials and provides the following comments.

PROJECT LOCATION:

The Toland Road Landfill (TRL) is located at 3500 Toland Road in unincorporated Ventura County. The project site is approximately 1.7 miles north of Highway 126, between the cities of Santa Paula and Fillmore.

D-1

PROJECT DESCRIPTION:

Watershed Protection District most recently reviewed an Initial Study (IS) and Notice of Preparation of a Supplemental Environmental Impact Report (NOP SEIR) for the project and provided no comments at that time. This round of review focused on the Draft Supplemental Environmental Impact Report (DSEIR) which proposes modification to the existing conditional use permit (CUP) No. 3141 for TRL; originally approved by Ventura County Board of Supervisors in 1996. The Toland Optimization Plan (TOP) is a request for a minor CUP modification, which includes the following elements:

1. Remove the maximum permitted daily tons of 1,500 tpd (CUP Condition 3.j) and replace it with a condition that allows a maximum daily Municipal Solid Waste (MSW) tonnage based on the MSW capacity of 152 heavy truck trips per day as evaluated in the 1996 Final EIR for the current CUP
2. Allow TRL to be filled to its maximum elevation of 1,435 feet above mean sea level as set forth in the current CUP (Condition 5.a.2.a)
3. Remove the 2027 closure date (Condition 5.a.2.b)

D-2

4. Remove the 15-million-ton lifetime cap (Condition 5.a. 2.c)
5. Modify the CUP Conditions of Approval related to the decommissioned biosolids facility
6. The project is located in FEMA Flood Zone X unshaded which is an area of minimal flood hazard.

D-2

The minor CUP modification will not modify the approved final grades of the landfill, equipment used on site, or the type of waste accepted. Therefore, the project would have a less than significant impact on O'leary Creek (redline channel) located to the west of the project.

APPLICATION COMPLETENESS:

COMPLETE - from our area of concern.

WATERSHED PROTECTION DISTRICT COMMENTS:

D-3

Flood Control Facilities / Watercourses – Ventura County Watershed Protection District

Watershed Protection has no comments on this project.

If you have any questions, please feel free to contact me by email at Sergio.Vargas@ventura.org or by phone at (805) 650-4077.

END OF TEXT

Letter D

COMMENTER: Sergio Vargas, Deputy Director, Ventura County Public Works

DATE: July 29, 2020

Response D-1

This comment provides introductory information indicating the Public Works Department has reviewed the Draft SEIR and acknowledges the project location. This comment is acknowledged. This comment does not raise concerns pertaining to the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

Response D-2

This comment provides information about the project description and indicates that the project would have a less than significant impact on O'Leary Creek, located to the west of the project.

This comment is acknowledged. This comment does not raise any concerns regarding the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

Response D-3

This comment indicates the project application is complete and indicates that Ventura County Watershed Protection District has no comments on the project, and provides an agency contact for questions.

This comment is acknowledged. This comment does not raise any concerns regarding the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

Ventura County
Air Pollution
Control District

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Dr. Laki Tisopulos, P.E.
Air Pollution Control Officer

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Mindy Fogg, County Planning DATE: September 3, 2020

FROM: Nicole Collazo, Planning Division

SUBJECT: Review of RMA 18-001-1; TRL Optimization Plan DSEIR

Air Pollution Control District (APCD) staff has reviewed the subject project, which is a Draft Supplemental Environmental Report (DSEIR) for the Toland Road Landfill Optimization Plan (project). The landfill owner is requesting to modify the existing County Conditional Use Permit (CUP) 3141 by proposing the following: 1) Remove the existing maximum permitted disposal rate of 1,500 tpd (Condition 3.j) and replace it with a condition that allows a maximum daily tonnage to be based on the capacity of 152 heavy truck trips per day as evaluated in the 1996 FEIR for the current CUP; 2) Allow TRL to be filled to its maximum elevation of 1,435 feet amsl as set forth in the current CUP (Condition 5.a.2.a); 3) Remove the 2027 closure date (Condition 5.a.2.b); 4) Remove the 15-million-ton lifetime cap (Condition 5.a.2.c); and 5) Modify the CUP Conditions of Approval related to the decommissioned biosolids facility. The project location is at 3500 Toland Road in the unincorporated area between the City of Santa Paula and the City of Fillmore. The Lead Agency for the project is the Ventura Regional Sanitation District (VRSD). **E-1**

APCD has the following comments regarding the Air Quality and Greenhouse Gas sections of the DSEIR.

Air Quality Section 4.1

The project does not propose to increase any stationary or on-site off-road equipment emissions and only on-road mobile daily emissions are expected to change (transfer trucks hauling waste). Note- the Toland Road Landfill has a permit with APCD for the operation of its landfill gas collection system and dust/odor-driven operations. The project is not expected to trigger a permit modification as changes are only related to the off-site on-road waste delivery vehicles entering and exiting the landfill. The potential maximum increase may be an additional 67 transfer trucks per day, or 152 one-way truck trips per day. However, the 1996 certified EIR analyzed operational emissions for 152 trucks per day, which included enacting mitigation measures for the reduction of operational criteria **E-2**

pollutant emissions and reflected in CUP 3141 Conditions 61-68. Specifically, Condition 68 was designed to ensure compliance with EIR mitigation measures to reduce operational emissions of ozone precursors ROC and NOx estimated, which included 152 truck trips per day, other operational parameters, and dust and odor impacts.

E-2

APCD can verify that VRSD has been in compliance with Condition 68 for the last 22 years. On November 10, 1998 the Air Pollution Control Board (APCB) found VRSD complied with the requirements of the Emissions Mitigation Program proposed and included in the 1996 EIR and subsequent CUP. VRSD funded emission reduction projects in the Santa Clara River Valley such as the Carl Moyer Program, Pinkerton Ranch engine replacement, Brucker Farms engine replacement, and Kimball Toppers engine replacement. The September 9, 2003 APCD Board Letter and attachments are located in our website here under Agenda Item #10, "*Approval to Fund the Toland Landfill Expansion Emission Mitigation Projects*". Condition 68 of CUP 3141 is also attached to this memo for easy of access in PDF form.

E-3

Because the 1996 EIR already quantified, analyzed, and proposed mitigation measures for potential air quality impacts (dust, odors, ROC, NOx), which included a maximum of 152 truck trips per day, and is the only potential operational change being proposed for the project, an additional air quality analysis is not required. The air emissions presented in the current DSEIR may be considered "double-counting" emissions already disclosed and reviewed for potential environmental impacts. In fact, since the 1996 analysis of operational air emissions in the landfill, federal and state air pollution standards have become stricter and cleaner pollutant-emitting equipment is not only readily available but required to be used as most off-road and on-road vehicles and equipment have phase out years for use. This would ensure that current air emissions are much less than once calculated (cleaner low-sulfur diesel, low-NOx burners, diesel PM traps, LPG/RNG, etc.) two decades ago.

E-4

However, the methodology [Vehicle Miles Travelled (VMT) comparison of potential truck routes] used in the Air Quality section of the 2020 DSEIR may be reasonable for three reasons. First, the establishment of ground-level ozone precursor numerical thresholds is based on assessing the regional impact of air quality and thus a regional, or cumulative, VMT comparison may be appropriate. Second, the VMT analysis was conservative in its assumptions and presents a "worst-case scenario", such as using the farthest VMT distance route (Del Norte Recycling Center in Oxnard), that there would be a potential max trips per day reached, and the correct assumption that there are only 2 active MSW landfills servicing Ventura County, thus having accurate VMT analysis trip information. Thirdly, the air quality calculations relied solely on the VMT analysis conducted by ATE and Rincon Consultants (DSEIR Appendix E), which may be consistent with SB 743 requirements of addressing transportation impacts by VMT in an effort to reduce air pollutant emissions, particularly greenhouse gasses, or GHGs.

E-5

Greenhouse Gas Emissions Section 4.2

A greenhouse gas (GHG) analysis was not included in the 1996 EIR as it predates SB 97 requirements to include a GHG analysis in CEQA reviews for discretionary projects. Neither the APCD nor the County of Ventura has adopted a threshold of significance applicable to Greenhouse Gas (GHG) emissions from projects subject to the County's discretionary land use permitting authority. However, we concur with the GHG methodology to be consistent with SB 743 VMT requirements in addressing GHGs in a cumulative way and State and County guidelines concurrent with the Appendix G Environmental Checklist Form criteria.

E-6

Thank you for the opportunity to review the DSEIR. Should you have any questions or concerns, you may contact me at nicole@vcapcd.org.

68. Emissions Mitigation Program

The permittee shall implement an Emissions Mitigation Program (EMP) as specified below. Issuance of Zoning Clearance No. 1 shall not be conditional on approval of the Compressed Natural Gas/Low Emission Vehicle Program component of the EMP. The EMP shall consist of the following:

a. Compressed Natural Gas/Low Emissions Vehicle Program

The permittee shall develop and implement a compressed natural gas vehicle program to compensate for project-related mobile source reactive organic gas (ROG) and nitrogen oxide (NOx) emissions and landfill fugitive ROG emissions. In lieu of compressed natural gas vehicles, the permittee may obtain or otherwise make available vehicles whose exhaust emissions of ROG and NOx are equal to or less than identical vehicles that operate on compressed natural gas. The permittee also may propose an alternative program designed to encourage or foster vehicles whose exhaust ROG and NOx emissions are equal to or less than similar vehicles fueled by compressed natural gas.

The Program (including any alternative program) shall be subject to approval by the Ventura County Air Pollution Control Board (APCD). Program implementation shall not occur until approval has been granted by the APCD. The Program shall include, but not necessarily be limited to, a workplan and milestones to help ensure successful implementation and full completion of the Program. Moreover, the Program also shall contain vehicle/vehicle fleet selection criteria. The Program also may include a provision to periodically test the exhaust emissions of participating vehicles. The APCD shall have final approval authority over the vehicles and/or vehicle fleets selected for participation in the Program. Only public and private motor vehicle fleets home based in Ventura County shall be eligible for the Program. Moreover, to the extent feasible and practical, acquisition of new compressed natural gas and/or low emission vehicles shall take precedence over retrofitting existing gasoline or diesel vehicles. The Program must contain provisions for maintenance and repair of the compressed natural gas and/or low-emission components of the vehicles. The program also shall contain provisions for periodic status/progress reports to the APCD. The progress reports shall be at least quarterly and shall at a minimum include: tasks completed and progress made; amount of Total Program Cost expended; any outstanding problems, concerns, or delays; and, tasks to be completed during the next reporting period.

The Program must commence within four months of approval by the APCD and shall be completed within four years of implementation. Program commencement means the start of the first task specified by the workplan. Program completion means that either

all vehicles required to be converted to compressed natural gas have been so converted and are in operation and any required refueling facilities are installed and operational, or the permittee has demonstrated to the satisfaction of the APCD that the Program has fully mitigated 152.5 pounds per day of project-related NOx emissions and 100.3 pounds per day of projected-related ROG emissions, or the Emissions Offset Fee or penalty fee (defined below) has been paid to the Air Pollution Control District.

The APCD may extend the four-year time period for completion of the Program. The APCD may grant such extensions only if the APCD has concluded, based on information and documentation supplied by the permittee, that the permittee has undertaken an aggressive and good faith effort to fully and successfully complete the Program. The APCD may consider other information when considering the permittee's request for a time extension. The length of any one time extension shall not be more than one year.

If compressed natural gas is to be used by any or all of the subject vehicles, the permittee may be required to site and install a natural gas refueling facility (or facilities) at a location (or locations) that will facilitate the convenient refueling of the compressed natural gas vehicles. Any such refueling facility or facilities must be operational by the time the compressed natural gas vehicles required by the Program are operational. Moreover, the refueling facilities may be required to be accessible and operable 24 hours per day. If feasible and appropriate, such refueling facilities may be required to be available to the public. Likewise, if a fuel or power source other than natural gas is to be used, the appropriate refueling/power facilities must be operational by the time the associated vehicles are operational.

The permittee is encouraged to consult with and, to the extent feasible work with, any other organizations, agencies, or parties deemed appropriate by the permittee and the APCD to design and implement the Program (including locating and installing any required refueling/power facilities).

Permittee's cost for the Program shall be $534,820 (total Program Cost). This cost is based on the California Air Resources Board's estimate of the cost per ton ($13,000) to scrap 1975-1981 automobiles. The permittee's Total Program Cost may be a lesser amount if the permittee can demonstrate to the satisfaction of the APCD that the Program has fully mitigated 152.5 pounds per day of project-related NOx emissions and 100.3 pounds per day of project-related ROG emissions.

Permittee's purchase of a compressed natural gas bus for the Santa Clara School District and the provision of mechanical maintenance of that bus pursuant to Condition 42.a(1)(d) shall be credited towards the total program costs.

If the permittee chooses to administer and manager the Program, the permittee shall be allowed to recover Program administration and management costs from the Total Program Cost. However, such costs shall not exceed 15 percent of Total Program Costs. If a third party administers and manages the Program, the permittee shall not be entitled to any cost recovery from the Total Program Cost.

Any APCD staff administrative and/or processing costs shall be paid through the condition compliance fund specified in Condition 22.

If the permittee is not able to complete the Program, the permittee shall pay the APCD an Emissions Offset Fee (EOF). This fee shall be the difference between the amount expended by the permittee implementing the Program and the Total Program Cost. The permittee can utilize the EOF only if the APCD has concluded, based on information and documentation supplied by the permittee, as well as any other information the APCD deems relevant and appropriate, that the permittee has undertaken an aggressive and good faith effort to successfully and fully implement the Program. If the APCD concludes that the permittee has not undertaken an aggressive and good faith effort to successfully and fully implement the Program, the permittee shall pay to the APCD an Emissions Offset Penalty Fee (EOPF). The EOPF shall equal the EOF specified above times 1.5 and shall be paid to the APCD within 60 days of the APCD Board action.

The APCD shall use the Emissions Offset Fee or Emissions Offset Penalty Fee monies collected to fund emission mitigation programs to reduce emissions in areas directly or indirectly affected by the project. Such emission mitigation programs shall be subject to approval by the APCD. Up to 15 percent of such funds may be used by the APCD to develop and administer such programs. Any APCD staff costs above 15 percent shall be paid through the condition compliance fund specified in Condition 22.

b. New Engine Emission Standards

When a mobile emission source (vehicle engine) not subject to (or exempted from) the Compressed Natural Gas/Low Emissions Vehicle Program specified above is used at the site for the first time, the source shall meet or exceed the emission standards adopted by the California Air Resources Board (ARB) or the U.S. Environmental Protection Agency (whichever is the more stringent) at that time for new engines of that class or type.

To implement this policy, the permittee shall notify the Planning Division and the APCD in writing of the following: (1) when a new piece of equipment subject to this condition is to be used on site (see below); (2) the type of engine proposed to be used; (3) the emissions data for that type of engine; and (4) the current ARB or U.S. Environmental Protection Agency emissions standard for new engines of that size or class. The APCD shall determine in writing that the specified engine meets the requirements of this condition before the equipment can be placed into service.

The requirement for the use of engines that meet current standards for new engines applies to each individual source when it is first used onsite, rather than to the first time a new class of engine is used onsite. For example, the first piece of heavy-duty earthmoving equipment on the site is required to meet the current ARB standard for new engines at that time. If a second piece of earthmoving is brought on site five years later, the engine of that second piece is required to meet the current ARB standard for new engines at the time the second engine is first used at the site.

The permittee shall install any retrofit or add-on emissions control devices for specific engine classes as soon as practical after such devices are certified by the ARB or other approved agency. The APCD shall determine the installation schedule of this

All the above emission requirements apply to all on-site mobile emission sources. Mobile sources not subject to the new engine emissions technology requirements include individual refuse trucks, private employee vehicles, and commercial and private vehicles that travel directly to the site.

The requirement of written approval for specific emission sources shall apply to any replacement equipment brought to the site to replace previously approved equipment. This replacement equipment shall meet the new engine emissions standard adopted by the ARB at that time for that engine class or type.

The APCD may waive the requirements of using the emissions standard for new engines of any given class or type, if, in the opinion of the APCD, application of the standard is not cost-effective, is technologically infeasible, or otherwise is not in the public interest. In such a case, the APCD may designate a different emissions standard that would have to be met. Such a waiver shall be periodically reviewed by the APCD and the waiver extended or revoked as determined to be appropriate by the APCD.
(Primary-APCD)

FIRE PROTECTION

69 Fire Department Condition Requirements

Letter E

COMMENTER: Nicole Collazo, Air Quality Specialist, Ventura County Air Pollution Control District

DATE: September 29, 2020

Response E-1

This comment provides introductory information indicating the Draft SEIR was reviewed by the Ventra County Air Pollution Control District (VCAPCD), and describing the proposed project and lead agency. This comment does not raise concerns pertaining to the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

Response E-2

This comment states that the project would not involve a permit modification and that the potential maximum increase in the number of waste hauling truck trips is within the number of trips analyzed in the 1996 FEIR, which included mitigation measures to reduce operational emissions of ozone precursors.

This comment does not raise concerns pertaining to the adequacy of the SEIR or the CEQA process. As discussed in Section 4.1, *Air Quality*, of the Draft SEIR, the proposed project would reduce vehicle miles traveled (VMT) associated with waste hauling in western Ventura County and would therefore result in a net reduction in criteria air pollutant emissions, including ozone precursors.

Response E-3

This comment states that VRSD has been in compliance with Condition 68 for 22 years and has funded emission reduction projects as part of its compliance.

This commenter does not raise concerns pertaining to the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

Response E-4

This comment states that additional air quality analysis is not required since the analysis in the 1996 FEIR covered emissions from a greater number of daily waste hauling truck trips, and required mitigation measures to address potential air quality impacts. This comment expresses a concern that emissions are being double-counted in the 1996 FEIR and in the current SEIR.

The analysis in Section 4.1, *Air Quality*, in the Draft SEIR estimates the net change in air pollutant emissions based on the net change in VMT associated with the proposed project. Therefore, the analysis does not double-count emissions and instead demonstrates a net reduction in criteria air pollutant emissions as a result of the proposed project.

Response E-5

This comment notes that the methodology used in the analysis for Section 4.1, *Air Quality*, of the Draft SEIR is reasonable because it assesses the project's regional air quality impacts using conservative assumptions based on VMT calculations.

This comment's support of the methodology used in the analysis for Section 4.1, *Air Quality*, is acknowledged.

Response E-6

This comment expresses support for the methodology used to evaluate the project's greenhouse gas impacts in Section 4.2, *Greenhouse Gas Emissions*, of the Draft SEIR because it is consistent with Senate Bill 743 VMT requirements and State and County guidelines.

This comment's support of the methodology used in the analysis for Section 4.2, *Greenhouse Gas Emissions*, is acknowledged.

September 7, 2020

Chris Theisen
General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003

Mr. Theisen:

This letter is the response of the Board of Trustees of Santa Clara Elementary School to the "Draft Supplemental Environmental Impact Report" (i.e., "Draft EIR") dated July, 2020. Our specific comments are primarily focused on those parts of the Draft EIR that deal with traffic and transportation. Before we share those comments, however, we feel the need to provide a clear characterization of the nature of the proposed project from the perspective of Santa Clara Elementary School. In other words, we want to explain what the proposed project means to us. **F-1**

Santa Clara Elementary School is located on SR 126. More precisely, the main school building and playground are only yards from the actual highway. The sounds and smells of high-speed traffic are ever present. The school's location is also within a stone's throw of the intersection of SR 126 and Toland Road. Any vehicle turning onto Toland from eastbound SR 126 must slow down as it nears the intersection and, most often, stop and wait to make the turn. Depending on the time of day and volume of traffic, this can take a long time. All of this means that the sounds and smells of vehicles stopping and starting and slowing and turning and veering are also ever present for children, their teachers, and their families. **F-2**

The families and staff of Santa Clara Elementary School themselves must travel on SR 126 multiple times per day, including especially during school drop-off and pickup hours. There is no alternative access to the school. Because of the school's location, and whether or not they utilize Toland Road itself, the families and staff are required to navigate the traffic at and around the intersection of SR 126 and Toland Road.

According to the Draft EIR, an average of 85 heavy trucks enter and exit Toland Road each day. By removing the existing maximum disposal rate, as many as 152 heavy trucks would be allowed to enter the landfill each day. This is an increase of 67 heavy trucks per day, a nearly 80% increase. This is not insignificant. In fact, it threatens our children's ability to learn and, most significantly, represents a clear and present danger to the physical safety of our students, families, and staff. The proposed project promises to make an already bad situation much, much worse. For all of its trumpeted benefits, it also asks us to bear an unequal burden of the project's costs. **F-3**

Our more specific comments:

(1) **The Draft EIR fails to capture the actual traffic phenomena that are not only regularly *observed* but directly *experienced* by families and staff of Santa Clara Elementary School.** The Draft EIR concludes the following: **F-4A**

> *The relatively low accident rate at the State Route 126/Toland Road intersection, adequate left-turn lane length for additional trips associated with the proposed project, and existing safety signage and route restrictions illustrate that the proposed project is adequately served*

by existing roadway facilities in the project vicinity and would not introduce or increase traffic hazards. (p.124)

This conclusion is demonstrably false. The proposed project is not adequately served by existing facilities. In fact, it is questionable whether *current* operations are adequately served by existing measures.

a. The left-turn lane is not only not adequate for additional trips, it is not adequate for the *current* number of trips. Any person who must regularly navigate the intersection can attest to this fact. At various times throughout the day, vehicles "stack up" beyond the boundaries of the turn lane. The methodology of the Draft EIR may have failed to identify this problem. It appears that the Draft EIR converted the measured number of vehicles per hour into an average number of vehicles per minute. It also presents delays at the intersection as an average. This is just not how traffic works, at least not the traffic at the intersection of SR 126 and Toland Road. Vehicles do not spread themselves out evenly over the course of an hour. They are bunched by having to stop at traffic signals as well as by varying driver behaviors. They come when they come, which can mean any number of vehicles can arrive at the intersection at the same time. Those vehicles do not face an "average" delay at the intersection. They face whatever delay may be caused by the actual traffic. In actual fact, multiple vehicles turning onto Toland Road do arrive at the intersection at the same time, both entering and exiting Toland Road. Once there, they can face delays many times longer than the "average" delay that is presented in the Draft EIR.

F-4A

b. Existing route restrictions currently prohibit contracted haul trucks from utilizing the left turn lane from State Route 126 onto Toland Road during school pick-up and drop-off periods (8:00 a.m. to 8:30 a.m. and 2:30 p.m. and 3:00 p.m.). This is already inadequate, and would certainly be inadequate for the proposed project. While trucks utilizing the left turn lane from SR 126 onto Toland Road present the most obvious danger, any vehicles entering and exiting Toland Road presents an increased risk across the entire day. Our first-hand experiences, and the shared experiences of our families and staff, includes many instances of near-accidents as drivers on SR 126 react to traffic entering and exiting Toland Road. There is nothing in the Draft EIR that addresses actual driver behavior.

F-4B

(2) **The Draft EIR identifies "Alternative 2" as an "environmentally superior alternative" to the proposed project, but provides a flawed justification for rejecting the alternative.** As described in the Draft EIR, Alternative 2 would "implement local improvements to the circulation system to reduce conflicts with local traffic accessing the Santa Clara Elementary School" (pp. 6-7; pp. 140-141). Alternative 2 is not further considered because SR 126 is managed by Caltrans and any improvements "would require a lengthy planning and evaluation process, as well as authorization by Caltrans" (p. 141). The Draft EIR goes on to say that "Caltrans support and approval are speculative, and ultimately, the improvements may not be feasible" (p. 141). We find this reasoning extraordinarily problematic:

F-5

a. In the first place, a process of planning and evaluation are not outcomes to be avoided. They are processes designed to make things better. If not, then why have such processes in the first place?

b. The fact that the process might be "lengthy" does not necessarily make it undesirable. Some things should take more time because they deserve careful consideration.

c. Caltrans support and approval are speculative because they are contingent on the information that would be generated by a process of planning and evaluation. This contingency is not a flaw. It is a design feature of responsible public policy and practice.

F-5

(3) **The Draft EIR fails to assess foreseeable increases in traffic volume.** In our comments on the Scoping of the EIR (dated October 14, 2019) we noted that the volume and speed of traffic on SR 126 have increased significantly over the last few years. We also pointed to future developments in both Ventura and Los Angeles Counties as a predictable source of increases in traffic volume. These foreseeable increases are simply not addressed with anything more than a conventional algorithm in the Draft EIR. In this case, the Draft EIR fails to assess the actual situation in this specific region.

F-6

We continue to oppose the changes to the Conditional Use Permit proposed by the "Toland Optimization Plan." We continue to hope the District reconsiders its proposal and chooses to prioritize the health and safety of local residents and the families of Santa Clara Elementary School. In the meantime, we appreciate your attention to our comments on the "Draft Supplemental Environmental Impact Report" dated July, 2020.

F-7

Please feel free to contact the Board with any questions.

Sincerely,

The Board of Trustees
Santa Clara Elementary School District
20030 E. Telegraph Road
Santa Paula, CA 93060

Letter F

COMMENTER: The Board of Trustees, Santa Clara Elementary School District

DATE: September 7, 2020

Response F-1

This comment provides introductory information indicating that the letter provides comments on the Draft SEIR, as a characterization of the project from the perspective of the Santa Clara Elementary School. This comment does not raise concerns pertaining to the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

Response F-2

This comment indicates the proximity of the school to the State Route 126/Toland Road intersection and states that school families and staff are required to navigate traffic at the intersection during the school drop-off and pick-up hours.

See Topical Response Transportation 1 – Conflicts with Santa Clara Elementary School.

Response F-3

This comment describes the increase in truck traffic proposed, indicates the project is a threat to school safety and activities, and is an unequal burden on the school.

See Topical Response Transportation 1 – Conflicts with Santa Clara Elementary School.

Response F-4A

This comment states that the left-turn lane on State Route 126 is not adequate for additional trips since it is not adequate for the current number of trips; and that vehicles stack beyond the turn lane. This comment also states that the traffic analysis appears to convert the traffic volumes into hourly volumes that do not accurately represent traffic since multiple vehicles turn onto Toland Road at the same time, both entering and exiting Toland Road. Thus, average delay does not represent actual conditions.

See Topical Response Transportation 2 – Traffic Capacity.

Response F-4B

This comment states that the existing CUP condition that prohibits inbound trucks from making a left-turn from State Route 126 onto Toland Road between 8:00 to 8:30 a.m. and between 2:30 to 3:00 p.m. is inadequate since any vehicles using the intersection present an increased risk across the entire day. The comment goes on to state that the experiences of families and staff include many instances of near accidents as drivers on State Route 126 react to traffic entering and existing Toland Road.

The comment does not provide, nor does it constitute, substantial evidence to support the assertion that use of the State Route 126/Toland Road intersection represents an unusual risk, or that the project would result in an increased risk, and is not consistent with the evaluation of accidents in the traffic impact analysis. Also, see Topical Response *Transportation 3 – Accidents*.

Response F-5

This comment includes excerpts from the Draft SEIR alternatives analysis regarding Alternative 2 and potential traffic improvements along State Route 126 and Toland Road. This comment further indicates that the reasoning regarding the alternative's infeasibility is problematic, in that planning processes are not outcomes to be avoided, that a lengthy process is not necessarily undesirable, and that Caltrans speculative support and approval is not a flaw, but a feature of responsible public policy and practice.

As indicated in Section 6.1 of the Draft SEIR:

In the case of the proposed project, based on the analysis presented in Sections 1.4, 4.1 through 4.4, and 5.1 through 5.2, all impacts of the proposed project either do not exceed the threshold of significance or can be reduced to a less-than-significant level through implementation of mitigation measures. As a result, **there is no need for the selection of an alternative to the project to reduce its significant and unavoidable impacts** (emphasis added). Nonetheless, alternatives to the proposed project are further evaluated in this section to provide for informed decision-making on whether there are alternatives to the proposed project that would further reduce already less than significant project impacts, meet project objectives, and be feasible to implement.

Alternative 2 was included to examine whether already less-than-significant project-specific transportation impacts could be reduced, what potential improvements might be appropriate to reduce significant impacts, and whether such improvements would be feasible. As indicated in the Alternative 2 analysis, the project-specific traffic study did not identify any hazards associated with study area facilities, and traffic conditions did not meet the Caltrans' requirements for a traffic signal. As no significant traffic impacts have been identified, the alternative considered improvements that might address **perceived** transportation conflicts, since this was a concern raised by a number of parties in the SEIR scoping process.

Given that a comprehensive traffic study did not identify any significant impacts, or identify exceedance of any thresholds that Caltrans would consider appropriate for improvements, it is appropriate to conclude that Caltrans support would be speculative, and that commitment to a lengthy, expensive, and time consuming planning and evaluation process, as required by Caltrans may not result in the implementation of any improvements. The study of improvements to a State traffic facility are practically driven by a purpose and need. Based on the transportation study, such a purpose and need for improvements can't be demonstrated in this instance.

Response F-6

This comment states future developments in Ventura and Los Angeles counties are not addressed in the Draft SEIR with anything more than a conventional algorithm, and fails to assess actual conditions in this specific region.

See Topical Response Transportation 4 – Cumulative Traffic Impacts.

Response F-7

This commenter expresses opposition to the project, and references previous comments dated July 2020. Previous scoping comments are summarized, along with an explanation of how they are addressed.

This comment does not raise concerns pertaining to the adequacy of the SEIR or the CEQA process. Therefore, no further response is required.

September 7, 2020

Chris Theisen
General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003

Mr. Theisen:

This letter contains a few responses to the Draft Supplemental Environmental Impact Report (DSEIR) of July, 2020.

As a father, husband, and property owner, I continue to object to the Toland Optimization Project. While I understand the stated objectives of the TOP, it represents, for me and my family, the breaking of a contract (i.e, the removal of the closure date), a massive increase in the daily impact of living on Toland Road (i.e, the noise and physical danger of an 80% increase in heavy truck traffic), and the ongoing failure of VRSD to fully and honestly address the impacts of Toland Road Landfill on its neighbors. With respect to the DSEIR, I confess that it is almost impossible to believe that an increase of 67 heavy trucks (or a total of 114 heavy truck trips past our home) wouldn't have a significant impact on noise or traffic safety. That just doesn't fit with any part of my family's experience. **G-1**

I have identified a few specific problems with the DSEIR, as follows:

- The DSEIR states that "Toland Road is a two-lane local road with a posted speed limit of 25 miles per hour" (p. 102). I believe this is simply <u>false</u>. There may be a yellow warning sign that *recommends* a speed of 25 miles per hour, but I have been unable to locate a posted speed limit. I have personally contacted County of Ventura personnel who have explained to me that county roads with no posted speed limit have an actual speed limit of 55 miles an hour. In any case, actual traffic on Toland Road regularly exceeds 25 miles an hour. If the assumption of the speed limit on Toland Road is wrong, any subsequent calculations are suspect. **G-2**

- The DSEIR does not describe, at least not in any accessible way, the specific location, date, or time when noise data were collected. In fact, it seems that no actual measurements may ever have been taken. Instead, it seems that all data were collected from other agencies or created using more general data not specific to TRL (e.g., the average composition of solid waste disposal truck fleets). I couldn't find any measurements of noise levels that were actually collected from the "sensitive receivers," including from my own residence. If this is true, well, I am astonished. Why not measure the actual noise at the actual sites of the "sensitive receivers" identified in the DSEIR? If there were, in fact, measurements of noise taken at any of the sensitive receivers, the specific location, date, and time should be specified in order to evaluate the SEIR's findings. **G-3**

- In general, the Traffic Impact Study (Appendix E) fails to address the actual, observable traffic phenomena on Toland Road and at the intersection of Toland Road with SR 126. Traffic volume, delays, LOS, etc. are all calculated based on hourly counts (provided by **G-4**

VRSD). These counts appear to then be averaged across the hour for additional analysis. Simply put, this is not how traffic works on Toland Road and through the intersection of Toland with SR 126. What follows are four examples of observable, regularly-occurring situations that the DSEIR's methodology fails to address (Note: These situations were previously described in the comments on the Scoping meeting from the Board of Trustees of Santa Clara Elementary School, dated October 14, 2019):

1. To enter Toland Road from westbound SR 126, drivers must decelerate into a turn lane, then make a 90-degree right hand turn onto Toland Road. It is a very sharp turn. Every vehicle must slow significantly. Heavy trucks typically cross over into the downhill/southbound lane of Toland Road to make the turn. Because of the way the intersection is set up, drivers turning right onto Toland are completely blind to any vehicles traveling down Toland. Near-misses are common.
2. To enter Toland Road from eastbound SR 126, a driver must pull into a marked turn lane in the center divider of the highway and turn left across two lanes of eastbound 126. This requires a rapid deceleration from the eastbound fast lane, often with impatient drivers stacked behind, then waiting for a safe break in traffic. It often also requires monitoring and responding to the behavior of any drivers waiting to exit Toland Road to travel eastbound on Highway 126 (see #4 below).
3. To enter westbound Highway 126, drivers going southbound on Toland Road must decelerate on a 6-7% downhill grade, make a 90-degree right hand turn, enter an acceleration lane, and then speed up into a break in the flow of westbound traffic. This is hard enough for a regular passenger vehicle, but heavy trucks making the same turn make for some of the most dangerous conditions at the intersection. It just doesn't work, even when everyone is trying to make it work. I have been forced off the highway onto the shoulder multiple times; other families of Santa Clara School report the same.
4. To turn left onto eastbound Highway 126, drivers must decelerate on a 6-7% downhill grade and come to a complete stop at a stop sign. Drivers must then wait for a break to cross two lanes of westbound traffic, turn left onto eastbound Highway 126, and accelerate to highway speed. It's hard to overstate how dangerous this is when heavy trucks are involved. Sometimes a heavy truck driver will decide not to stop in order to make it through a break in traffic, turning left at speed. Sometimes a heavy truck driver will refuse to wait for a vehicle trying to turn left onto Toland Road from Highway 126 (see above), and will speed from the stop sign into the intersection, occasionally even stranding the eastbound driver in the middle of westbound lanes. Even under the best of conditions with the most cautious truck drivers, the situation is untenable.

Any and all of these four situations would be made much worse by the increase in traffic associated with the proposed project. Yet despite the fact that they were described as part of the scoping process, the DSEIR fails to address them at all, treating them as a more generalized concern with traffic patterns and then referring to a study that uses or generates data that obscure what actually happens.

G-4

- The Traffic Modeling Data used to calculate noise impacts in the DSEIR is suspect (see Table 19, p. 103). The DSEIR repeatedly states a current usage of an average of 85

G-5

heavy truck trips per day (e.g., Table 9, p. 43). Because each truck trip uses Toland Road for both entry and exit to the landfill, this represents a total of 170 heavy trucks trips along Toland Road (85 x 2). But the Traffic Modeling Data transforms this information into 1/3 medium truck trips and 2/3 heavy truck trips. The very fine print in Footnote 1 to Table 19 explains that transformation this way:

> *The truck vehicle mix on Toland Road is assumed to be approximately 33.3 percent medium trucks (56 medium truck trips) and 66.6 percent heavy trucks (114 heavy truck trips) (FHWA 1999).*

As far as I can tell, there is no reason to transform the data. Except that treating some percentage of the 85 heavy truck trips reported by the VRSD as medium truck trips would favor a lower estimate of the noise impact, since medium trucks are less noisy than heavy trucks. In any case, any conclusions based on the assumption described above would likely underestimate the noise impacts of the proposed project. Given that the calculated impact is already approaching the threshold level, this underestimation is especially problematic.

G-5

- The DSEIR's estimate of increased traffic volume is unrealistic. The Traffic Impact Study (Appendix E) upon which the DSEIR repeatedly relies acknowledges that "traffic on Highway 126 is expected to continue to grow due to developments beyond the study area." Yet the Traffic Impact Study estimates this growth in the following way:

  > *Historical counts on Highway 126 show that traffic has increased at a rate of 0.67% per year adjacent to Toland Road over the past 10 years. A 0.67% per year background growth factor was therefore applied to the Highway 126 traffic volumes for a 5-year period to account for cumulative traffic growth. Cumulative and Cumulative + Project traffic forecasts are shown on Figures 7 and 8.* (p. 18)

  There are two problems with this approach. In the first place, relying on historical rates of growth to estimate future growth plainly ignore housing developments that are currently in progress along the Highway 126 corridor: Harvest at Limoneira (at Hallock and Highway 126 in eastern Santa Paula); Bridges (in Fillmore); Piru Gateway (in Piru); and the master-planned community of Newhall Ranch (along the Santa Clara River at the boundary of Los Angeles and Ventura Counties). Even these changes, already in progress, are only a part of what a real analysis might have identified. Plenty of agencies and individuals generate longer-term estimates of population and economic growth for our region. In the second place, the 0.67% background growth factor was only applied for a 5-year period. Even in the most optimistic forecast, the proposed project could extend the life of the landfill through 2033. Applying the growth factor for a 5-year period appears to ignore this fact.

G-6

Thank you in advance for addressing the problems I have described above. Please feel free to contact me with questions, concerns, or comments.

Dr. Jason Duque
273 Toland Road
Santa Paula, CA 93060
jasontheduque@gmail.com

Letter G

COMMENTER: Dr. Jason Duque

DATE: September 7, 2020

Response G-1

This comment expresses opposition to the proposed project, and criticism of VRSD regarding the commenter's perceived current impacts resulting from the landfill. This comment also expresses concern regarding the increase in heavy trucks and impacts on noise and traffic safety.

An increase in truck traffic is not in and of itself considered a significant impact under CEQA. Based on the analysis in the Draft SEIR, Section 4.4, *Transportation and Traffic*, impacts would be less than significant. Traffic safety with respect to accident data history along State Route 126 near Toland Road was also evaluated and no traffic safety concerns have been identified. Also see Topical Response *Transportation 3 – Accidents*.

As discussed in Section 4.4, *Noise*, of the Draft SEIR, roadway noise impacts would be less than significant. Specific noise comments raised in comment Letter G are further addressed in the below responses.

Response G-2

This comment suggests that the speed limit assumed in the noise analysis in Section 4.3, *Noise*, of the Draft SEIR may be inaccurate and notes that the speed limit on County roads with no posted limit is 55 miles per hour.

The speed limit in the noise analysis is based on the posted advisory speed limit sign located on the southbound lane of Toland Road near its northern terminus at the entrance to TRL. Although this is an advisory speed limit, it is appropriate and reasonable to assume that trucks would be traveling 25 miles per hour on Toland Road en route to and from TRL for several reasons:[1]

- Trucks turning from State Route 126 onto the southern segment of Toland Road would be traveling at slow speeds (i.e., five to ten miles per hour) and would require some distance to accelerate as they travel north on Toland Road.
- Toland Road is a relatively steep uphill road with an approximately eight percent grade. Based on a study completed by the University of Michigan for the Federal Highway Administration on the effect of road grade on truck speeds, the median speed of trucks traveling uphill on a road with an eight percent grade is approximately 20 miles per hour due to heavy vehicle weight and engine power limitations (Gillespie 1985[2]).
- This analysis reasonably assumes that truck drivers would follow best safety practices while driving downhill on Toland Road, shifting into lower gear and complying with the advisory speed limit to avoid brake failure and/or runaway events. It would be speculative to assume that truck

[1] This discussion focuses on truck speeds because the project would only impact the number of truck trips on Toland Road and would not influence the number of passenger cars or other vehicle types.
[2] Gillespie, Thomas D. *Methods for Predicting Truck Speed Loss on Grades*. University of Michigan Transportation Research Institute. November 1985. https://deepblue.lib.umich.edu/bitstream/handle/2027.42/137/73427.0001.001.pdf;jsessionid=4340311D928F2C2DEE665FECF01F1924?sequence=2 (accessed October 2020).

drivers would operate vehicles in an unsafe manner such that vehicle speeds would exceed 25 miles per hour while travelling downhill on Toland Road.

- Trucks travelling southbound on Toland Road toward State Route 126 would have to further decelerate for some distance as they approach this stop sign controlled intersection.

As discussed in Section 4.4, *Noise*, of the Draft SEIR, roadway noise impacts would be less than significant. Given the above reasoning, the approach to the noise analysis remains sound, and no revisions to the noise analysis are necessary in response to this comment.

Response G-3

This commenter states that the locations, dates, and times of noise measurement data is not included in the Draft SEIR and that data for existing noise levels were created using general data not specific to TRL.

This commenter is correct in noting that noise measurements from the field were not used to determine existing noise levels at the nearest sensitive receivers. Instead, the noise analysis in the Draft SEIR utilizes industry standard tools and practices, using the Federal Highway Administration's Traffic Noise Model (TNM), as well as SoundPLAN to estimate existing sound levels, and establish a baseline for comparison against a proposed project, among other conditions, that is modelled in the same fashion.

The estimated existing noise levels at the nearest sensitive receivers are summarized in Table 18 of Section 4.4, *Noise*, of the Draft SEIR, and includes estimated noise levels at the commenter's residence (273 Toland Road, represented as R3). The locations of sensitive receivers are displayed on a map in Figure 6. Section 4.3.3(a), *Methodology and Significance Thresholds*, in Section 4.4, *Noise*, of the Draft SEIR, explains how noise levels were calculated using the following data specific to Toland Road and the TRL:

- Existing, cumulative, and project-related traffic volumes on Toland Road and State Route 126 as estimated in the project's traffic study
- The expected routes of truck traffic on Toland Road and State Route 126
- The approximate distance between each roadway and the nearest sensitive receiver, as measured on Google Earth
- The topography of the local area, as provided by the United States Geological Survey for the *Fillmore* and *Santa Paula Peak* 7.5-minute quadrangles
- The posted mandatory and advisory speed limits for State Route 126 and Toland Road, respectively
- The specific hours of operation for TRL
- The specific ground cover type of "normal uncompacted ground", which approximates the rural nature of the local area

It is appropriate to estimate existing noise levels using TNM and SoundPlan because this provides a more accurate, side-by-side comparison of existing noise levels to estimated existing plus project, cumulative, and cumulative plus project noise levels because all analysis scenarios are based on the same set of underlying data and assumptions. This approach provides a fair comparison to determine the change created by a project. Therefore, noise measurements are not necessary or utilized for the noise analysis, and no revisions to the SEIR are warranted.

Response G-4

This comment states that the traffic analysis fails to address actual, observable traffic phenomena on Toland Road and at the State Route 126/Toland Road intersection since volumes, delays, LOS, etc. are all calculated based on hourly counts. This comment also describes the pathway for vehicles entering Toland Road from westbound State Route 126 and concludes that near-misses are common, that the pathway for vehicles entering Toland Road from eastbound State Route 126 "requires rapid deceleration from the eastbound fast lane, often with impatient drivers stacked behind, then waiting for a safe break in traffic. It often also requires monitoring and responding to the behavior of any drivers waiting to exit Toland Road to travel eastbound on State Route 126." Lastly, regarding the pathway for southbound vehicles exiting Toland Road that turn right onto westbound State Route 126 this comment states "it just doesn't work. I have been forced off the highway onto the shoulder multiple times; other families of Santa Clara School report the same."

It is unclear what location this commenter's vehicle was positioned at when it was forced off the road onto the shoulder. Toland Road southbound includes a left-turn lane that is controlled by a Stop sign for vehicles turning left onto eastbound State Route 126; and a southbound right-turn lane that transitions to an acceleration lane on westbound State Route 126. The westbound acceleration lane allows vehicles to gain speed and enter the westbound #2 lane at the same approximate speed as highway traffic – rather than no acceleration lane and vehicles merging into the westbound #2 lane from a stopped position. Thus, the southbound right-turn lane on Toland Road and acceleration lane on westbound State Route 126 provide a safety benefit for vehicles turning right from Toland Road.

Also see Topical Responses Transportation 1 – Conflicts with Santa Clara Elementary School, Transportation 2 – Traffic Capacity, and Transportation 3 – Accidents.

Response G-5

This comment questions why the noise analysis distinguishes between medium trucks and heavy truck trips while the remainder of the Draft SEIR characterizes waste hauling trips as heavy truck trips.

In most instances, the Draft SEIR uses the term "heavy truck trips" as a colloquial way of characterizing the nature of vehicles hauling waste to TRL by providing a distinction between passenger vehicles (such as light-duty automobiles and light-duty trucks) and waste hauling trucks. However, for the purposes of traffic noise modeling, it is necessary to use more refined terminology to accurately characterize the nature of the truck fleet by distinguishing between "medium trucks," which include all cargo vehicles with two axles and six tires that generally have a gross vehicle weight between 4,500 kilograms (9,900 pounds) and 12,000 kilograms (26,400 pounds), and "heavy trucks," which include all cargo vehicles with three or more axles that generally have a gross vehicle weight more than 12,000 kilograms (26,400 pounds). Trucks could be of a variety of types and sizes, including packer trucks, self-haul trucks, and transfer trucks. Given this uncertainty, waste hauling truck trips were divided into "medium truck" and "heavy truck" classifications based on the composition of solid waste trucks observed in an FHWA study of truck fleet characteristics to provide a reasonable estimate of the project's noise impacts, as stated on page 102 of the Draft SEIR (FHWA 1999). This allocation of truck trips is a reasonable assumption predicated upon fact, which constitutes substantial evidence per Public Resources Code Section 21082.2 and CEQA Guidelines Section 15064(f)(5). Therefore, there is substantial evidence to support the allocation of waste

hauling trips into the “medium truck” and “heavy truck” classifications in the noise analysis. No revision to the SEIR is warranted in response to this comment.

Response G-6

This comment questions the approach used to evaluate future traffic conditions.

See Topical Response Transportation 4 – Cumulative Traffic Impacts.

Destiny Timms

From: Ciuffetelli, Anthony <Anthony.Ciuffetelli@ventura.org>
Sent: Friday, September 18, 2020 9:36 AM
To: Chris Theisen
Subject: FW: Comments for Toland Optimization Plan (RMA# 18-001-1)

Hello Mr. Theisen,

The Public Works agency had two additional comments regarding the Toland Optimization Plan. Please refer to the comments below.

Best,

Anthony Ciuffetelli
Ventura County Planning Division
Planning Programs
(805)654-2443

From: Baculinao, Norman <Norman.Baculinao@ventura.org>
Sent: Thursday, September 17, 2020 5:23 PM
To: Derossett, Glenn <Glenn.Derossett@ventura.org>; Ciuffetelli, Anthony <Anthony.Ciuffetelli@ventura.org>
Subject: FW: Comments for Toland Optimization Plan (RMA# 18-001-1)

This may be too late but we two minor comments, are as follows

- They reference LOS values from a 1996 study in a majority of their analysis. Is that too old to be relevant for this document?
- For Table 41 and 43 they should provide a mitigation plan since they do show that there may be impact.

H-1

From: Arrieta, Darren <Darren.Arrieta@ventura.org>
Sent: Wednesday, September 2, 2020 11:17 AM
To: Baculinao, Norman <Norman.Baculinao@ventura.org>; Martin, Harrison <Harrison.Martin@ventura.org>; Derossett, Glenn <Glenn.Derossett@ventura.org>
Subject: FW: Comments for Toland Optimization Plan (RMA# 18-001-1)

Everyone,

FYI, please see Anthony's e-mail below.

Thank you,

Darren Arrieta, PE
Advance Planning – Engineer III
Roads & Transportation Department

PUBLIC WORKS VENTURA COUNTY
800 S. Victoria Ave.
Ventura, CA 93009 -1620
P: 805.477.7157
VCPWA Online | Facebook | Twitter

From: Ciuffetelli, Anthony <Anthony.Ciuffetelli@ventura.org>
Sent: Wednesday, September 2, 2020 11:07 AM
To: Nicole Collazo <nicole@vcapcd.org>; Chervu, Shweta <Shweta.Chervu@ventura.org>; Loeb, Kim <Kim.Loeb@ventura.org>; Mutkowska, Ewelina <Ewelina.Mutkowska@ventura.org>; Maxwell, James <James.Maxwell@ventura.org>; Lomeli, Emily <Emily.Lomeli@ventura.org>; Husted, Dawn <Dawn.Husted@ventura.org>; Tobie Mitchell <Tobie.Mitchell@ventura.org>; Arrieta, Darren <Darren.Arrieta@ventura.org>; Derossett, Glenn <Glenn.Derossett@ventura.org>; Bassiri, Ramesh <Ramesh.Bassiri@ventura.org>; Blackbern, Linda <Linda.Blackbern@ventura.org>; Convery, Abigail <Abigail.Convery@ventura.org>; Minjares, Manuel <Manuel.Minjares@ventura.org>
Cc: Fogg, Mindy <Mindy.Fogg@ventura.org>; Thomas, Denice <denice.thomas@ventura.org>; Chaffee, Thomas <Thomas.Chaffee@ventura.org>
Subject: Comments for Toland Optimization Plan (RMA# 18-001-1)

Good Morning,

In addition to yesterday's reminder that comments are due this Friday, the Planning Division requests that any potential comments be forwarded by the close of business on Thursday.

Best,

Anthony Ciuffetelli
Ventura County Planning Division
Planning Programs
(805)654-2443

Letter H

COMMENTER: Norman Baculinao

DATE: September 17, 2020

Response H-1

This comment asks whether the LOS values are still relevant since they are referenced from a 1996 study, and further indicates that a mitigation plan should be provided for tables 41 and 43 since there is a potential impact.

The comments from the Public Works agency are acknowledged. We note that these comments are on the Initial Study prepared for the project, and included in Appendix A of the Draft SEIR. The Initial Study indicates that traffic should be further evaluated in a SEIR. Transportation and traffic impacts have been thoroughly evaluated in the Section 4.4, *Transportation and Traffic*, of the Draft SEIR. The analysis in the SEIR relies on a 2020 traffic study, among other recent data and information, as opposed to the 1996 study mentioned in the comment. In addition, based on the analysis in Section 4.4, impacts to transportation and traffic would be less than significant.

3 Errata to the Draft SEIR

This section presents specific changes to the text of the Draft SEIR that have been made in response to comments, to clarify information presented in the Draft SEIR.

These revisions are not considered significant new information that would trigger Draft SEIR recirculation pursuant to *CEQA Guidelines* Section 15088.5. CEQA Guidelines Section 15088.5 outlines the requirements for recirculation of an EIR prior to recirculation:

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish & Game Com.*(1989) 214 Cal.App.3d 1043).

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

Based on the above guidance, there is no significant new information, as defined in CEQA Guidelines Section 15088.5, requiring recirculation of the SEIR. Rather, the revisions correct, or clarify information presented.

3.1 Text Revisions to the Draft SEIR

Where revisions to the main text are called for, the section and page are set forth, followed by the appropriate revision. Added text is indicated with **<u>underlined</u>** text. Text deleted from the Draft SEIR is shown in **~~strikethrough~~**. Page numbers correspond to the page numbers of the Draft SEIR.

Section 2.1.1 Landfill Capacity

Table 9 is revised as follows:

Table 2 Landfill Capacity Conditions Comparison

Description	Existing Condition	Proposed Project[1]	Result of the Project
Average daily waste accepted **(tons)**	1,394 ~~**tpd**~~	2,864 ~~**tpd**~~	Increase by 1,470 ~~**tpd**~~
Average number of heavy trucks per day	85	152	Increase by 67 heavy trucks
Average amount of waste per truck **(tons)**	16.4 ~~**tpd**~~	18.84 ~~**tpd**~~	New trucks would be mostly transfer trucks
Annual tonnage accepted	426,617	878,976	Increase by 452,359 ~~**tons**~~

[1] Proposed Project: daily limit is based on the tonnage associated with up to 152 heavy trucks, including the addition of 67 heavy trucks.

~~**Notes: tpd = tons per day**~~

Source: VRSD 2019

Appendix F

A consistency analysis of the new General Plan was prepared at the County's request and included in Appendix F.

Appendix F

2040 General Plan Consistency

2040 General Plan Consistency

On September 15, 2020, the Ventura County Board of Supervisors adopted the 2040 General Plan, which will become effective on October 15, 2020. The project's consistency with the applicable Ventura County 2040 General Plan goals, policies, and programs is evaluated in Table 1. As demonstrated in the analysis below, the proposed project is substantially consistent with the County's 2040 General Plan.

Table 3 Project Consistency with the Ventura County 2040 General Plan

2040 General Plan Goal, Policy, or Program	Project Consistency
Goal LU-1: To ensure that the County can accommodate anticipated future growth and development while promoting orderly growth and development that enhances quality of life, maintains a safe and healthful environment, preserves valuable natural resources, and plans for adequate public facilities and services. **Goal LU-7:** To recognize and plan for low-density rural residential and recreational development, while preserving resources, avoiding hazards, and providing adequate public facilities and services.	**Consistent.** The project would expand the permitted disposal capacity of the TRL, without an expansion of the landfill footprint or substantial changes in landfill operations. This supports the County's goal of providing adequate public services (solid waste facilities).
Goal LU-4: To ensure that land uses are appropriate and compatible with each other and guide development in a pattern that will minimize land use conflicts between adjacent land uses. **Goal LU-5.** To promote the effective implementation and use of the General Plan Land Use Diagram. **Goal LU-6:** To provide appropriate land use designations that provide for the long-term preservation of the county's rural lifestyle, productive farmland and supporting services, and the vast open space resources that define the county.	**Consistent.** The project does not modify the existing land use or zoning of the project site or introduce a new land use conflicts. The project site is in an Open Space (OS) Zone, which includes landfills as a legitimate and proper use of OS land in the county, and as an essential public facility providing service to the county.
Policy CTM-1.1: Vehicle Miles Traveled (VMT) Standards and CEQA Evaluation. The County shall require evaluation of County General Plan land use designation changes, zone changes, and discretionary development for their individual (i.e., project-specific) and cumulative transportation impacts based on Vehicle Miles Traveled (VMT) under the California Environmental Quality Act (CEQA) pursuant to the methodology and thresholds of significance criteria set forth in the County Initial Study Assessment Guidelines. **Goal CTM-4:** To ensure that land use and transportation planning efforts in the county are cohesive, mutually supportive, and reduce Vehicle Miles Traveled (VMT) per capita within the unincorporated areas of the County.	**Consistent.** Impact T-1 in Section 4.4, *Transportation*, determined that the project would result in less than significant impacts to VMT, as the project would result in decreased VMT (Draft SEIR, pp. 124-125). The project would result in a redirection of existing truck trips from Simi Valley Landfill to TRL. However, TRL is closer to the transfer stations—located in Ventura and Oxnard—than Simi Valley Landfill, which would result in a net reduction in VMT. Similarly, the project's net reduction in VMT would not contribute to cumulative County VMT impacts.
Policy CTM-1.3: County Level of Service (LOS) Standards. The County shall maintain LOS standards for use as part of the County's transportation planning including the traffic impact mitigation fee program, and the County's review and consideration of proposed land use legislation and discretionary development. For purposes of County transportation planning and review	**Consistent.** Section 4.4, *Transportation*, and a traffic study completed in February 2020 and included in Appendix E, discussed LOS and roadway capacity effects, in accordance with County and Caltrans requirements. The project would allow an additional 67 truck trips per day access to the TRL, as previously evaluated in the 1996 FEIR. The Draft SEIR indicates the proposed project would cause no change in

2040 General Plan Goal, Policy, or Program	Project Consistency
and consideration of proposed land use legislation and discretionary development, the County shall use the following minimum acceptable Level of Service (LOS) for road segment and intersection design standards within the Regional Road Network and all other County-maintained roadways: a. LOS-'C' for all Federal functional classification of Minor Collector (MNC) and Local roadways (L); and b. LOS-'D' for all Federal functional classifications except MNC and L, and Federal and State highways in the unincorporated area, except as otherwise provided in subparagraph (c and d); c. LOS-'E' for State Route 33 between the northerly end of the Ojai Freeway and the city of Ojai, Santa Rosa Road, Moorpark Road north of Santa Rosa Road, State Route 34 north of the city of Camarillo, and State Route 118 between Santa Clara Avenue and the city of Moorpark; d. LOS 'F' for Wendy Drive between Borchard Drive to Lois Avenue; and e. The LOS prescribed by the applicable city for all federal highways, state highways, city thoroughfares and city-maintained local roads located within that city, if the city has formally adopted and is implementing a General Plan policy, ordinance, or a reciprocal agreement with the County regarding development in the city that is intended to improve the LOS of County-maintained local roads and federal and state highways located within the unincorporated area of the county. f. At any intersection between two or more roads, each of which has a prescribed minimum acceptable LOS, the lower LOS of the roads shall be the minimum acceptable LOS for that intersection. **CTM-1.4 Level of Service (LOS) Evaluation** County General Plan land use designation changes and zone changes shall be evaluated for their individual (i.e., project-specific) and cumulative effects, and discretionary developments shall be evaluated for their individual effects, on Level of Service (LOS) on existing and future roads, to determine whether the project: a. Would cause existing roads within the Regional Road Network or County-maintained roadways that are currently functioning at an acceptable LOS to function below an acceptable LOS; b. Would add traffic to existing roads within the Regional Road Network or County-maintained roadways that are currently functioning below an acceptable LOS; and c. Could cause future roads planned for addition to the Regional Road Network or County-maintained roadways to function below an acceptable LOS.	LOS under existing plus project conditions or future plus project conditions (Draft SEIR pp. 128-135). The project would not exceed the County's LOS standards or conflict with the County's LOS policies (Ibid.).

2040 General Plan Goal, Policy, or Program	Project Consistency
d. The Level of Service (LOS) evaluation shall be conducted based on methods established by the County.	
Policy CTM-2.2: Functional Classification. The County shall plan a roadway system that has adequate capacity and is designed to provide reasonable and safe use by vehicles, public transportation, bicycles and pedestrians with minimum delay pursuant to LOS standards described in Policy CTM-1.2. The road system should follow Federal Highway Administration (FHWA) classification as identified on Figure 4-4. **Policy CTM-2.27: Discretionary Development and Conditions of Approval to Minimize Traffic Impacts.** The County shall require that discretionary development be subject to permit conditions of approval, where feasible, to minimize traffic impacts by incorporating pedestrian and bicycle pathways, bicycle racks and lockers, ridesharing programs, transit improvements (bus turnouts, shelters, benches), and/or transit subsidies for employees or residents of the proposed development. **Policy CTM-3.10: Bicycle Storage Facilities.** The County shall require adequate bicycle storage facilities (e.g., bicycle racks, lockers) for discretionary development as determined by allowable land uses at a given site.	**Consistent.** Impact T-4 in Section 4.4, *Transportation*, of the Draft SEIR, determined that the project would result in less than significant impacts from conflicts with adopted plans, policies, or programs regarding public transit, bikeways, and pedestrian facilities, as the project would not change existing roadway infrastructure or disrupt public transit, bicycle, and pedestrian usage of existing facilities (Draft SEIR, p. 127). Refer to the consistency analysis with Policies CTM-1.3 and CTM-1.4 above regarding LOS. The project would introduce additional truck trips to the TRL, and the nature of the project (increased daily solid waste disposal capacity) would not result in a change in bicycle trips, pedestrian activity, or the demand for local transit facilities in relation to the project site. Therefore, it is not necessary for the project to provide additional transit, pedestrian, or bicycle facilities at the site.
Policy CTM-2.3: County Road Access. The County shall require discretionary development with access onto a County road to have the access point(s) designed and built to County standards. **Policy CTM-2.5: Emergency Services.** The County shall coordinate the development and maintenance of all transportation facilities with emergency service providers to ensure continued emergency service operation and service levels. **Policy CTM-2.28: Emergency Access.** The County shall ensure that all new discretionary projects are fully evaluated for potential impacts to emergency access. Mitigation of these impacts shall be handled on a project-by-project basis to guarantee continued emergency service operations and service levels. **Goal HAZ-12:** To provide for the safe and efficient evacuation of residents in times of need.	**Consistent.** Impact T-3 in Section 4.4, *Transportation*, of the Draft SEIR determined that the project would not impair emergency access, as the project would not involve change to the site's access roadways and the additional truck trips would not substantially increase traffic delays (Draft SEIR, p. 127). The Initial Study Checklist (provided in Appendix A to the Draft SEIR) also determined that the project would not impair an adopted emergency response or evacuation plan, as it would not modify the approved final grades of the landfill, equipment used on site, or type of waste accepted.
Policy CTM-2.4: Transportation System Safety. The County shall strive to provide safe operating conditions for all appropriate modes and uses of County roadways. **Policy CTM-2.19: Safety Metrics.** The County shall continue to examine and update safety metrics for California Environmental Quality Act (CEQA) impact analysis as appropriate. Options include but are not limited to: queue spill-back at intersections; mid-block unprotected crossings; and, increased crossing distances.	**Consistent.** Impact T-2 in Section 4.4, *Transportation,* of the Draft SEIR describes potential impacts due to design features or incompatible uses (Draft SEIR, pp. 125-127). The project would not result in traffic queues that could not be accommodated by the existing turn lanes. The accident rate at State Route 126 and Toland Road is below the statewide average and does not warrant further investigation of roadway safety improvements. Similarly, the existing signage and safety features at the State Route 126 and Toland Road intersection are adequate for the increase in daily trips resulting from the project, and no new traffic hazards would be introduced.

2040 General Plan Goal, Policy, or Program	Project Consistency
Policy CTM-2.29: Railroad Safety Assessment. The County shall require that all new discretionary development is evaluated for potential impacts to existing railroad facilities and operations and identify appropriate mitigation measures, as warranted therein.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have no effect on local railroads. There are no railroads within 0.5 mile of the site, and railroad operations would not be affected by operation of the project, as proposed activities would be contained within the site.
Policy CTM-6.5: Electric Vehicle Charging Stations. The County shall support the installation of electric vehicle charging stations, where feasible, at County facilities, parking lots, park-and-ride lots, truck stops, and new development.	**Not Applicable.** While the project would increase truck trips to the TRL, these vehicles would not spend time parked at the facility, as they would travel to the site only for the purpose of unloading solid waste material before leaving.
Policy CTM-7.2: Local Funding Mechanisms. The County shall continue to use local financing mechanisms such as gas tax, vehicle registration fees, and Traffic Impact Mitigation Fees to help fund transportation projects. The County shall continue to support regional and county-wide measures for transportation funding.	**Consistent.** Section 2, *Project Description*, of the Draft SEIR states: "[w]hile VRSD is exempt from the County's traffic Impact Mitigation Fee Ordinance 4071 as a public agency, VRSD agreed to make a payment equivalent to the fee that would be required under Ordinance 4071 to mitigate the cumulative traffic impacts to the regional road network from the project," (Draft SEIR, p. 57). Therefore, the project would support the County's Traffic Impact Mitigation Fee program and regional transportation projects.
Goal PFS-5: To maximize recycling, reuse, and composting of solid waste and ensure the safe handling and disposal of the remaining solid and hazardous waste.	**Consistent.** The TRL accepts municipal solid waste. TRL facility operations and safety procedures, are in compliance with state and local guidelines for the handling and disposal of solid waste. The TRL does not handle or accept hazardous waste.
Goal COS-1: To identify, preserve, protect, and restore sensitive biological resources, including federal and state-designated endangered, threatened, rare, or candidate species and their supporting habitats; wetland and riparian habitats; coastal habitats; habitat connectivity and wildlife corridors; and habitats and species identified as "locally important" by the County.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have no effect on biological resources. A biological resources assessment for the TRL 1996 FEIR concluded no special-status or sensitive species occurred in the project area and no biological resource impact would occur. The project would not expand the physical footprint of the landfill.
Policy COS-1.3: Wildlife Corridor Crossing Structures. Based on the review and recommendation of a qualified biologist, the design and maintenance of road and floodplain improvements, including culverts and bridges, shall incorporate all feasible measures to accommodate wildlife passage. **Policy COS-1.4: Consideration of Impacts to Wildlife Movement.** When considering proposed discretionary development, County decision-makers shall consider the development's potential project-specific and cumulative impacts on the movement of wildlife at a range of spatial scales including local scales (e.g., hundreds of feet) and regional scales (e.g., tens of miles). **Policy COS-1.5: Development Within Habitat Connectivity and Wildlife Corridors.** Development within the Habitat Connectivity and Wildlife Corridors overlay zone and Critical Wildlife Passage Areas overlay zone shall be subject to the applicable provisions and standards of these overlay zones as set forth in the Non-Coastal Zoning Ordinance.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect on habitat connectivity, as there are no significant mapped landscape linkages or wildlife movement corridors on the project site, and the project does not involve any expansion of the landfill footprint. While truck trips could create noise that could intimidate wildlife and cause relocation, adherence to existing Conditions of Approval would reduce this potential impact to less than significant.

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Policy COS-1.10: Evaluation of Potential Impacts of Discretionary Development on Wetlands. The County shall require discretionary development that is proposed to be located within 300 feet of a wetland to be evaluated by a County-approved biologist for potential impacts on the wetland and its associated habitats pursuant to the applicable provisions of the County's Initial Study Assessment Guidelines.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have no effect on wetlands, as the project would not modify the approved final grades of the landfill or expand the landfill into wetland or riparian areas. There is no wetland within 300-feet of the TRL footprint.
Goal COS-3: To preserve, protect, and enhance the unique scenic resources in Ventura County, and ensure access to scenic resources within Ventura County for present and future generations. **Policy COS-3.1: Scenic Roadways.** The County shall protect the visual character of scenic resources visible from state or County designated scenic roadways.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect on scenic resources. The project site is visible from a public viewing location (State Route 126); however, existing Conditions of Approval require continued maintenance of landscape screening. The project would not expand the landfill footprint or modify finished grades such that scenic resources or public views would be affected.
Goal COS-4: To identify, inventory, preserve and protect cultural, historical, paleontological, and archaeological resources in Ventura County, including Native American resources, for their scientific, educational, and cultural value.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect on cultural, historical, paleontological, and archaeological resources. The TRL 1996 FEIR included an archaeological study, and determined the project site is not located on an area of known paleontological importance. Existing Conditions of Approval require paleontological monitoring and implementation of a Resource Protection Program. The project would not modify the TRL's approved limits of operation and therefore would not affect archaeological or historical resources.
Goal COS-5: To preserve and protect soil resources in the county from erosion and for agricultural productivity.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have no effect on agricultural resources, as the project site is an operating landfill not located on important farmland and not incompatible with nearby agricultural productivity. The project does not involve any landfill expansion, and thus would not impact soils designated as important farmland, or existing agricultural land. The Initial Study Checklist (provided in Appendix A to the Draft SEIR) also determined the project would not result in erosion hazards, as the project would not involve new soil disturbance or modification of the landfill grades.
Goal COS-6: To manage mineral resources in a manner that identifies economically significant mineral deposits and plans for and protects access to, extraction, and long-term conservation of mineral resources for existing and future generations.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have no effect on mineral resources, as the project site is not located on or adjacent to a mineral resource zone or near a mineral resource extraction access road.

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Goal COS-8: To minimize energy consumption and increase the use of renewable energy.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have no effect on energy consumption. The project would not alter the equipment used on site or modify energy consumption at the landfill. Fuel consumption related to trips to TRL would increase due to increased truckloads per day to the TRL; however, the overall energy consumption associated with movement of solid waste would decrease due to the reduction in VMT achieved by the project.
Goal COS-10: To improve the long-term sustainability of the community through local efforts to reduce greenhouse gas (GHG) emissions	**Consistent.** As discussed in Section 4.2, *Greenhouse Gas Emissions*, of the Draft SEIR, waste that would be accepted by TRL under the project is already being generated in the western Ventura County wasteshed (Draft SEIR, pp. 92-94). Currently, this waste is being delivered to other landfills further from the source of its generation, such as the Simi Valley Landfill. While the project would increase the amount of waste accepted at TRL, it would have no effect on waste generation rates and, therefore, would not affect overall GHG emissions associated with municipal solid waste decomposition in the western Ventura County wasteshed. Furthermore, one of the project's objectives is to maximize in-county waste disposal capacity at TRL to minimize travel distances and related air pollutant and GHG emissions from waste hauling vehicles. As discussed in Section 4.4, *Transportation*, of the Draft SEIR, delivery to TRL instead of the Simi Valley Landfill for waste generated in Oxnard and Ventura would result in a net reduction in VMT, and associated fossil fuel use, related to waste hauling activities in the wasteshed (Draft SEIR, pp. 124-125). This would lead to a net decrease in GHG emissions from waste hauling in the county by a minimum of 649 metric tons (MT) of carbon dioxide equivalents (CO_2e) per year and a maximum of 17,035 MT of CO_2e per year (Draft SEIR, pp. 92-94). Therefore, the project would assist local efforts to reduce GHG emissions and improve the long-term sustainability of the community.
Policy COS-10.2: Community Greenhouse Gas Emissions Reduction Target for 2030. The County shall work toward achieving a community-wide GHG emissions reduction target of 41 percent below 2015 levels by 2030.	**Consistent.** As discussed under Goal COS-10, the project would not affect overall GHG emissions associated with municipal solid waste decomposition in the western Ventura County wasteshed and would result in a net reduction in GHG emissions from waste hauling in the county by a minimum of 649 MT of CO_2e per year and a maximum of 17,035 MT of CO_2e per year (Draft SEIR, pp. 92-94). Therefore, the project would contribute toward the County's goal of achieving a community-wide GHG emissions reduction target of 41 percent below 2015 levels by 2030.

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Policy COS-10.3: Community Greenhouse Gas Emissions Reduction Goals for 2040 and 2050. The County shall work toward achieving longer-term, post-2030 community-wide GHG emissions reduction goals, as follows: ▪ 61 percent below 2015 levels by 2040, and ▪ 80 percent below 2015 levels by 2050.	**Consistent.** As discussed under Goal COS-10, the project would not affect overall GHG emissions associated with municipal solid waste decomposition in the western Ventura County wasteshed and would result in a net reduction in GHG emissions from waste hauling in the county by a minimum of 649 MT of CO_2e per year and a maximum of 17,035 MT of CO_2e per year (Draft SEIR, pp. 92-94). Therefore, the project would contribute toward the County's longer-term, post-2030 community-wide GHG emissions reduction goals.
Policy COS-10.4: Greenhouse Gas Reductions in Existing and New Development. The County shall reduce GHG emissions in both existing and new development through a combination of measures included in the GHG Strategy, which includes new and modified regulations, financing and incentive-based programs, community outreach and education programs, partnerships with local or regional agencies, and other related actions.	**Consistent.** As discussed under Goal COS-10, the project would not affect overall GHG emissions associated with municipal solid waste decomposition in the western Ventura County wasteshed and would result in a net reduction in GHG emissions from waste hauling in the county by a minimum of 649 MT of CO_2e per year and a maximum of 17,035 MT of CO_2e per year (Draft SEIR, pp. 92-94). Therefore, the project would contribute toward reducing GHG emissions associated with waste hauling trips generated by existing development.
Goal HAZ-1: To improve the resilience of the County to wildfire risk by locating, designing, and constructing development in a manner that minimizes the risk, and by providing effective fire prevention, suppression, and rescue services and facilities. **Policy HAZ-1.1: Fire Prevention Design and Practices.** The County shall continue to require development to incorporate design measures that enhance fire protection in areas of high fire risk. This shall include but is not limited to incorporation of fire-resistant structural design, use of fire-resistant landscaping, and fuel modification around the perimeter of structures.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect on fire hazards. While the site is in a very high fire hazard area, existing Conditions of Approval require that all structures meet hazardous fire area building code requirements. The project does not modify the approved final grades of the landfill and would not exacerbate fire hazards in the area.
Goal HAZ-2: To minimize the loss of life, injury, property damage, and economic and social dislocations resulting from flooding, dam failure, seismic-induced flooding, post-fire debris flow, tsunamis, or other water inundation hazard.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect on flooding, as the project would not increase impervious surfaces and TRL maintains an on-site basin that captures stormwater runoff. The TRL is located outside the 100- and 500-year floodplains. The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would result in no impact from seiche or tsunami hazards. The project site is not located near a body of water that could result in a seiche and is not within a tsunami inundation zone.
Goal HAZ-4: To minimize the risk of loss of life, injury, collapse of habitable structures, and economic and social dislocations resulting from geologic and seismic hazards.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect from seismic hazards. There are no active faults through the project site and the project does not propose habitable structures. The project would not modify the landfill liners or increase slope instability.

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Goal HAZ-5: To minimize the risk of loss of life, injury, serious illness, damage to property, and economic and social dislocations resulting from the use, transport, treatment and disposal of hazardous materials and wastes.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect from hazardous materials. The project would not modify the approved final grades or types of waste accepted. Compliance with state and local regulations and existing Conditions of Approval would continue to minimize the risk from the use, transport, treatment, and disposal of hazardous materials. TRL would continue to not accept hazardous waste under the project.
Goal HAZ-9: To protect the health, safety, and general welfare of county residents by striving to eliminate or avoid the adverse noise impacts on existing and future noise sensitive uses. **Policy HAZ-9.7: Noise Control Priorities.** The priorities for noise control for discretionary development shall be as follows: 1. Reduction of noise emissions at the source. 2. Attenuation of sound transmission along its path, using barriers, landform modification, dense plantings, building orientation and placement, and the like. 3. Rejection of noise at the reception point using noise control building construction, hearing protection or other means.	**Consistent.** As discussed in Section 4.3, *Noise*, of the Draft SEIR, project-related waste hauling trips would increase roadway noise levels along Toland Road and State Route 126. However, project-related traffic would not increase ambient noise levels by more than 3 dBA and would not cause ambient noise levels to exceed the County's outdoor noise level standard of 60 CNEL, for residences and schools, under existing plus project and cumulative plus project conditions. As such, the project's roadway noise impacts would not exceed the limits established in Policy HAZ 9.8. Additionally, as diesel engine technology improves over time, quieter diesel truck engines would be used in future years as fleets are aged out and upgraded. Therefore, the project would not result in adverse noise impacts on existing noise-sensitive uses.
Policy HAZ-9.1: Limiting Unwanted Noise. The County shall prohibit discretionary development which would be impacted by noise or generate project-related noise which cannot be reduced to meet the standards prescribed in Policy HAZ-9.2. This policy does not apply to noise generated during the construction phase of a project.	**Not applicable.** The project does not propose noise-sensitive land uses or stationary noise generators. In addition, the project does not include construction and demolition activities. Therefore, the standards prescribed in Policy HAZ-9.2 are not applicable to the proposed project.
Policy HAZ-9.2: Noise Compatibility Standards. The County shall review discretionary development for noise compatibility with surrounding uses. The County shall determine noise based on the following standards: 1. New noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed CNEL 60 or Leq1H of 65 dB(A) during any hour. 2. New noise sensitive uses proposed to be located near railroads shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed L10 of 60 dB(A) 3. New noise sensitive uses proposed to be located near airports:	**Not applicable.** The project does not propose noise-sensitive land uses or stationary noise generators. In addition, the project does not include construction and demolition activities.

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a. Shall be prohibited if they are in a Community Noise Equivalent Level (CNEL) 65 dB or greater, noise contour; or b. Shall be permitted in the Community Noise Equivalent Level (CNEL) 60 dB to CNEL 65 dB noise contour area only if means will be taken to ensure interior noise levels of CNEL 45 dB or less. 4. New noise generators, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor, measured at the exterior wall of the building, does not exceed any of the following standards: a. Leq1H of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.; b. Leq1H of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.; and c. Leq1H of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m. 5. Construction noise and vibration shall be evaluated and, if necessary, mitigated in accordance with the Construction Noise Threshold Criteria and Control Plan (Advanced Engineering Acoustics, November 2005)	
Policy HAZ-9.8: Implement Noise Control Measures for Traffic Noise. The County shall require noise control measures to be implemented along roadways for new discretionary development generating traffic noise if either of the following circumstances would exist: ▪ The discretionary development would result in traffic noise levels above a County noise compatibility standard stated in Policy HAZ 9.2 in an area where traffic noise levels, under existing conditions, do not exceed the County noise compatibility standard; or, ▪ The discretionary development would result in an increase in traffic noise levels of 3 dBA or greater in an area where traffic noise levels under existing conditions exceed a County noise compatibility standard stated in Policy HAZ 9.2. Noise control measures may include increased vegetation, roadway pavement improvements and maintenance, and site and building design features. If such measures are not sufficient to reduce a new discretionary development's fair-share of traffic-generated noise at sensitive receptors, a sound wall barrier may be constructed. All feasible noise reduction measures shall be implemented to ensure the development's fair-share of traffic-generated noise is reduced, consistent with Policy HAZ 9.2.	**Consistent.** As discussed under Goal HAZ-9, project-related traffic would not cause ambient noise levels to exceed the County's outdoor noise level standard of 60 CNEL for residence in areas where existing traffic noise levels do not exceed the County's noise compatibility standard under existing plus project and cumulative plus project conditions. In addition, at Santa Clara Elementary School where existing traffic noise levels exceed the County's outdoor noise level standard of 60 CNEL, the project would not increase ambient noise levels by more than 3 dBA. Additionally, as diesel engine technology improves over time, quieter diesel truck engines would be used in future years as fleets are aged out and upgraded. Therefore, noise control measures are not necessary.

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Goal HAZ-10: To promote a high level of air quality in order to protect public health, safety, and welfare, and mitigate any adverse air quality impacts to the maximum extent feasible.	**Consistent.** As discussed under Goal COS-10, the project would result in a net reduction in VMT associated with waste hauling trips in the county, which would result in a net reduction in criteria air pollutant emissions. Therefore, the project would not result in any adverse air quality impacts.
Policy HAZ-10.1: Air Pollutant Reduction. The County shall strive to reduce air pollutants from stationary and mobile sources to protect human health and welfare, focusing efforts on shifting patterns and practices that contribute to the areas with the highest pollution exposures and health impacts.	**Consistent.** As discussed under Goal COS-10, the project would result in a net reduction in VMT associated with waste hauling trips in the county, which would result in a net reduction in criteria air pollutant emissions. Therefore, the project would contribute to the County's policy of reducing air pollutant emissions from mobile sources.
Policy HAZ-10.2: Air Quality Management Plan Consistency. The County shall prohibit discretionary development that is inconsistent with the most recent adopted Air Quality Management Plan (AQMP), unless the Board of Supervisors adopts a statement of overriding considerations.	**Consistent**. As discussed in Section 4.1, *Air Quality,* of the Draft SEIR, the project would be consistent with the 2016 AQMP because it would not cause an exceedance of the growth projections that underlie the AQMP air pollutant emission forecasts.
Policy HAZ-10.3: Air Pollution Control District Rule and Permit Compliance. The County shall ensure that discretionary development subject to Ventura County Air Pollution Control District (VCAPCD) permit authority complies with all applicable APCD rules and permit requirements, including the use of Best Available Control Technology (BACT) as determined by the VCAPCD.	**Consistent**. The project would comply with VCPACD rules as they pertain to the proposed project.
Policy HAZ-10.9: Mitigation of Objectionable Odors. The County shall require that discretionary development which will create objectionable odors that could affect a substantial number of people are appropriately mitigated. The project, pursuant to state law, shall be required to operate in accordance with the Rules and Regulations of the Ventura County Air Pollution Control District (VCAPCD), with emphasis on Rule 51, Nuisance throughout the life of the permit.	**Consistent**. As discussed in Section 4.1, *Air Quality*, of the Draft SEIR, the TRL currently addresses odors from existing landfill operations through daily cover controls and best management practices. The proposed project does not include expanding the landfill footprint, or altering operations; therefore, substantial changes in odor emissions from landfill operations are not be expected. Odors from engine exhaust from the additional heavy trucks accessing the site could be considered objectionable. However, these odors would be transitory in nature, as heavy trucks would be in transit towards the landfill and would not idle in public areas. Therefore, the project would not create objectionable odors that could affect a substantial number of people.
Policy HAZ-10.11: Air Quality Assessment Guidelines. In evaluating air quality impacts, the County shall consider total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act. The County shall evaluate discretionary development for air quality impacts using the Air Quality Assessment Guidelines as adopted by the Ventura County Air Pollution Control District (APCD), except that emissions from APCD-permitted sources shall also be included in the analysis. The County shall revise the Initial Study Assessment Guides to implement this policy.	**Consistent**. Section 4.1, *Air Quality*, of the Draft SEIR evaluates the project's air quality impacts using VCAPCD (2003) Ventura County Air Quality Assessment Guidelines.

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Policy HAZ-10.12: Conditions for Air Quality Impacts. The County shall require that discretionary development that would have a significant adverse air quality impact shall only be approved if it is conditioned with all feasible mitigation measures to avoid, minimize or compensate (offset) for the air quality impact. The use of innovative methods and technologies to minimize air pollution impacts shall be encourage in project design.	**Not applicable**. As discussed in Section 4.1, *Air Quality*, the project would have less than significant impacts to air quality. Therefore, conditions for feasible mitigation measures are not necessary.
Policy HAZ-10.13: Construction Air Pollutant Best Management Practices. Discretionary development projects that will generate construction-related air emissions shall be required by the County to incorporate best management practices (BMPs) to reduce emissions. These BMPs shall include the measures recommended by VCAPCD in its Air Quality Assessment Guidelines or otherwise to the extent applicable to the project.	**Not applicable.** The project does not propose construction activities.
Policy HAZ-10.14: Fugitive Dust Best Management Practices. The County shall ensure that discretionary development which will generate fugitive dust emissions during construction activities will, to the extent feasible, incorporate appropriate BMPs to reduce emissions to be less than applicable thresholds.	**Not applicable.** The project does not propose construction activities.
Goal WR-1: To effectively manage water supply by adequately planning for the development, conservation, and protection of water resources for present and future generations. **Goal WR-2:** To implement practices and designs that improve and protect water resources. **Goal WR-3:** To promote efficient use of water resources through water conservation, protection, and restoration. **Goal WR-4:** To maintain and restore the chemical, physical, and biological integrity and quantity of groundwater resources.	**Consistent.** The Initial Study Checklist (provided in Appendix A to the Draft SEIR) determined that the project would have a less than significant effect on water quality as well as groundwater supply and quality, because the project would not result in the extraction of groundwater, create a new demand for water, or exceed water quality objectives.

Source: County of Ventura 2040 General Plan

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