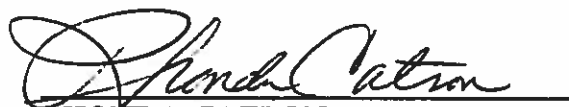


CLERK'S CERTIFICATE

I, Rhonda Catron, declare that I am the Clerk of the Board of Directors of the Ventura Regional Sanitation District. I hereby certify that the documents listed on the Index to Administrative Record, pages 1 through 9-963, are true and correct copies of documents which constitute the administrative record with respect to proceedings held before the Board of Directors of Ventura Regional Sanitation District regarding the Toland Road Landfill Expansion Project.

DATED: June 13, 1996


RHONDA CATRON,
Clerk of the Board of Directors of
Ventura Regional Sanitation District

**INDEX TO ADMINISTRATIVE RECORD
RELATING TO PROCEEDINGS
HELD BEFORE THE BOARD OF DIRECTORS OF
VENTURA REGIONAL SANITATION DISTRICT
REGARDING THE TOLAND ROAD LANDFILL EXPANSION PROJECT**

Document Description

Volume-Tab

Draft EIR:

Draft Environmental Impact Report 1

Final EIR:

Final Environmental Impact Report 2

Technical Reports:

Focused Geologic Investigation - July 1995 (ESI) 3-A

Faulting and Seismicity Technical Report - September 1995 (ESI) 3-B

Noise Assessment - June 16, 1995, Revised July 10, 1995 (Mestre Greve Associates) 3-C

Traffic Study - July 13, 1995 (WPA Traffic Engineering, Inc.) 3-D

Paleontologic Resource Evaluation - May 1, 1995 (Erathem - Vanir Geological Consultants) 3-E

Biological Resources - May 28, 1995 (Lawrence E. Hunt, Ph.D.) 3-F

Inventory and Evaluation of Cultural Resources - June 1995 (Kathleen Ann Bergin) 3-G

Investigation of Surface Water Seeps - August 1995 (ESI) 3-H

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Solid Waste Assessment Test (SWAT), Interim Final Report - December 1988
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**FINAL
ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION
AND LANDFILL
CLOSURE/POSTCLOSURE**

State Clearinghouse No. 95031009



Prepared For:

VENTURA REGIONAL SANITATION DISTRICT

January 1996

ENVIRONMENTAL SOLUTIONS, INC.

VENTURA REGIONAL SANITATION DISTRICT

1001 PARTRIDGE DRIVE, SUITE 150 • VENTURA, CA 93003-5562



A Public
Waste
Management
Agency

NOTICE OF AVAILABILITY

DATE: January 18, 1996

TO: Responsible and Trustee Agencies
County and Local Agencies
Interested Public and Groups
Surrounding Property Owners

SUBJECT: NOTICE OF AVAILABILITY OF AN ENVIRONMENTAL IMPACT REPORT

The Ventura Regional Sanitation District (VRSD), acting as the Lead Agency and in accordance with Section 21092.5 of the California Environmental Quality Act (CEQA), is providing the Final Environmental Impact Report (Final EIR) for the Toland Road Landfill (Toland) Expansion project to responsible and trustee agencies, the public, and surrounding property owners. The proposed project consists of the vertical and lateral expansion, and increase in daily waste tonnage at Toland. Toland is an existing municipal solid waste landfill between the cities of Santa Paula and Fillmore, in the Santa Clara Valley of Ventura County.

The Final EIR was prepared in accordance with the Guidelines for the Implementation of CEQA and provides responses to public and agency comments on the September 1995 Draft EIR. The Draft EIR was released for a 45-day public comment period that began on September 21, 1995 and ended on November 6, 1995. In accordance with the California Public Resources Code, Section 2100 et seq., the Draft EIR and the Final EIR together comprise the EIR in its entirety.

In accordance with CEQA, the Final EIR is being provided prior to the public hearing regarding the EIR by the VRSD Board of Directors. At this hearing, the VRSD Board of Directors will make a determination as to whether to certify the EIR as complete and adequate for purposes of CEQA. If the EIR is certified, the VRSD Board of Directors may use the Draft and Final EIR along with other technical, economic, and social data to decide whether to approve the proposed expansion of Toland.

The potential effects of the proposed project would be reduced to below a level of significance with implementation of the mitigation measures included in the EIR with the exception of the following:

- Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
- Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
- Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

These impacts are considered to be significant and unavoidable even after implementation of feasible mitigation measures and, in accordance with CEQA, specific statements of overriding considerations would be required for these impacts.

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CHAPTER 1.0
INTRODUCTION

1.0 INTRODUCTION

1. This Final Environmental Impact Report (EIR) for the proposed lateral and vertical expansion of the existing Toland Road Landfill (Toland) has been prepared in accordance with the California Environmental Quality Act (CEQA) and its implementing guidelines from the California Code of Regulations (CCR) Title 14, Section 1500 et seq. The Ventura Regional Sanitation District (VRSD) is the owner and operator of Toland, and is the CEQA lead agency for the proposed project.
2. The Draft EIR and this Final EIR together comprise the EIR in its entirety in accordance with California Public Resources Code (PRC), Section 2100 et seq. The EIR will be used by the Ventura Regional Sanitation District (VRSD) Board of Directors in their consideration of the proposed expansion of the Toland Road Landfill (Toland). The primary purposes of this EIR are to:
 - Identify and evaluate potential environmental consequences of the proposed project.
 - Indicate the manner in which those environmental consequences can be mitigated or avoided.
 - Identify and analyze alternatives that may reduce or eliminate potentially significant environmental impacts associated with the proposed project.
 - Identify impacts, if any, that even with the implementation of mitigation measures would be unavoidable and adverse.
 - Provide documentation supporting these determinations.
3. Toland is an existing Class III municipal solid waste landfill permitted to received 135 tons per day (tpd) of waste. It has a current permitted capacity of 6 million cubic yards or approximately 2.5 million tons of solid waste. VRSD is proposing a vertical and lateral expansion of Toland and an increase in the daily permitted tonnage limit. The proposed project would have the capacity for a maximum of 30 million cubic yards or a maximum of 15 million tons of solid waste, and would be permitted to receive a maximum tonnage of 1,500 tpd. Toland would provide 31 years of capacity under the proposed project.
4. The proposed project is being evaluated as a means of continuing to provide long-term, low cost, in-county disposal of solid waste beginning in the summer of 1996, when the Bailard Landfill (Bailard) is projected to reach capacity, or as soon as practicable after the closure of Bailard. Bailard serves the cities of Oxnard, Port Hueneme, Ventura, Camarillo and Ojai, and surrounding unincorporated areas. Under the proposed project, Toland would only receive waste generated in Ventura County, or from transfer stations/materials recovery facilities located in the County.

1.1 PROJECT BACKGROUND

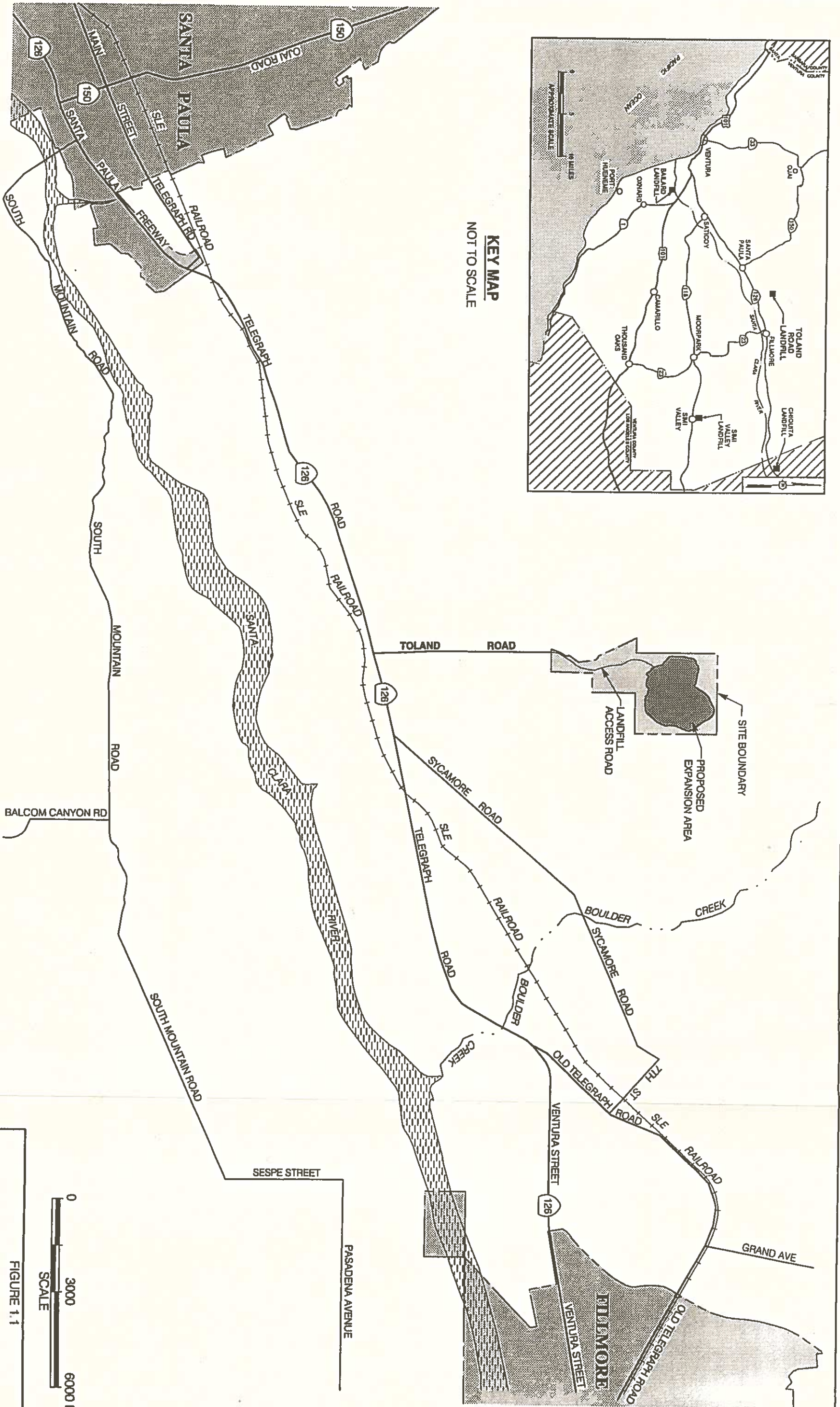
1.1.1 LOCATION AND PROJECT SETTING

1. Toland is owned and operated by VRSD. The landfill is located at 3500 North Toland Road in a rural, unincorporated area of Ventura County (County), California, between the cities of Santa Paula and Fillmore (see Figure 1.1). Access to the site is via State Highway 126 and Toland Road. Toland currently serves the Santa Clara Valley, which includes the cities of Santa Paula and Fillmore, the community of Piru, and other unincorporated areas of the valley.

2. As shown in Figure 1.2, the currently permitted landfill is located on 161 acres, of which approximately 53 acres are planned for disposal of waste. The remainder of the site is used as borrow areas for daily and intermediate cover, support facilities and buffer. The site consists of the northeast one-quarter of Section 29, Township 4 North, Range 20 West, San Bernardino Base and Meridian. It is located on County Assessors Parcel No. 041-140-095. VRSD also owns an approximate 53-acre adjoining parcel to the south of the landfill (County Assessors Parcel No. 041-140-105) (see Figure 1.2). While not part of the currently permitted landfill, this adjoining parcel is included as part of the proposed project.

1.1.2 OBJECTIVES OF THE PROPOSED PROJECT

1. The proposed expansion of Toland would provide capacity for a maximum of 30 million cubic yards, or a maximum of 15 million tons of municipal solid waste, would have a waste capacity of 1,500 tpd, and would be operated six days per week. The objectives of the proposed project include continued service to the Santa Clara Valley, and to make service available to the cities of Oxnard, Port Hueneme, Ventura, Camarillo and Ojai, and surrounding unincorporated areas, and the following:
 - Provide long-term (20 to 30 years) waste disposal capacity.
 - Provide low-cost waste disposal capacity.
 - Prevent, to the maximum extent practicable, a disruption of in-county waste disposal capacity when Bailard closes in the summer of 1996.
 - Provide additional in-county waste disposal capacity at a site that is in conformance with the County General Plan.
 - Provide additional in-county waste disposal capacity that meets the criteria of the draft County Landfill Siting Element (County, 1995a).
 - Provide additional in-county waste disposal capacity at a site that minimizes travel distance for waste hauling vehicles.
 - Maximize the waste disposal capacity at an existing landfill to conserve in-county waste disposal capacity.



KEY MAP
NOT TO SCALE

BALCOM CANYON RD

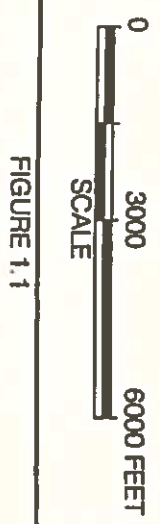


FIGURE 1.1

SITE VICINITY

TOLAND ROAD LANDFILL
VENTURA REGIONAL SANITATION DISTRICT
ENVIRONMENTAL SOLUTIONS, INC.

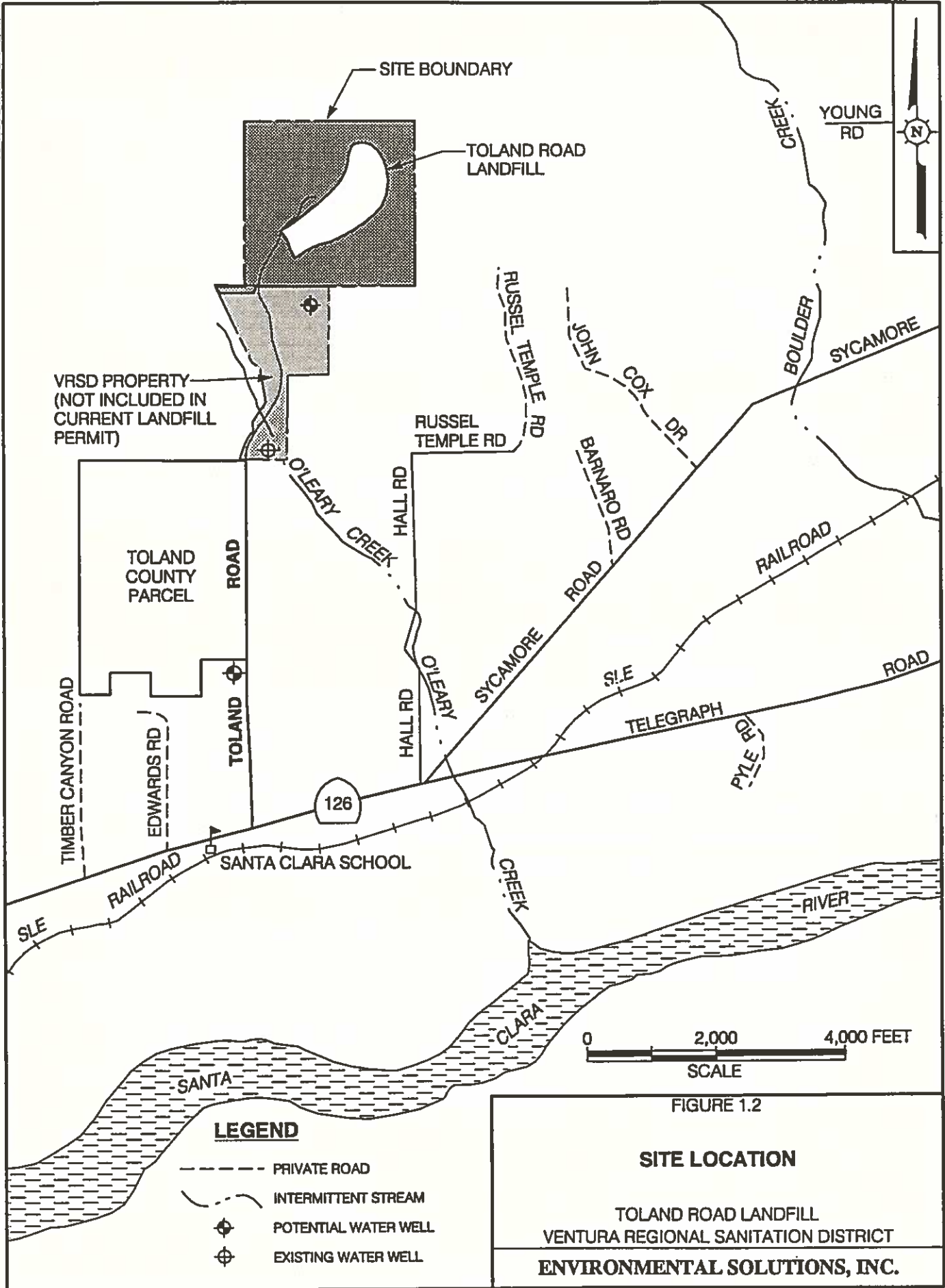


FIGURE 1.2

SITE LOCATION

TOLAND ROAD LANDFILL
 VENTURA REGIONAL SANITATION DISTRICT
ENVIRONMENTAL SOLUTIONS, INC.

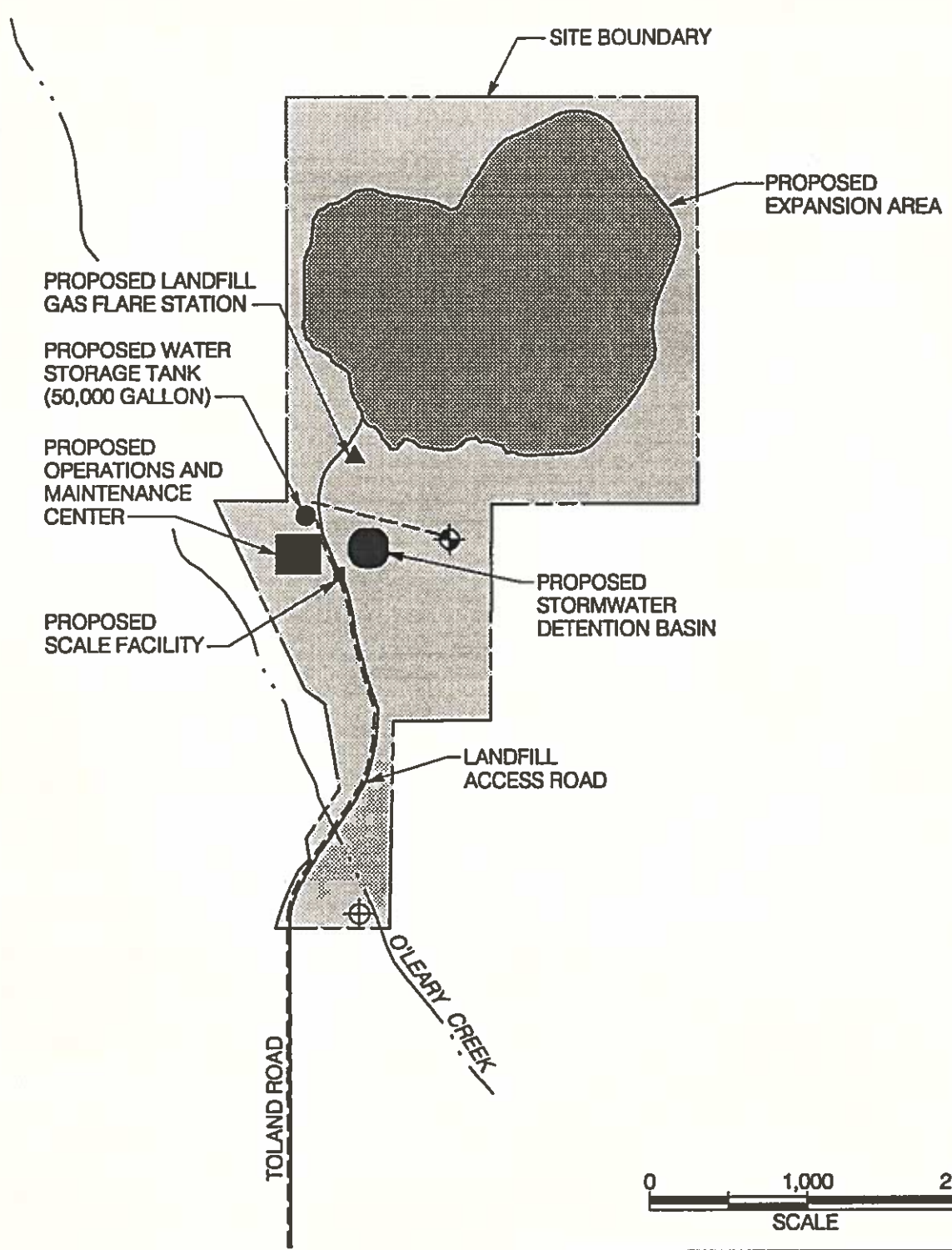
1.1.3 NEED FOR THE PROPOSED PROJECT

1. Various southern California communities, including Ventura County, are evaluating alternative methods of assuring long-term solid waste disposal capacity as their current landfills are reaching capacity. In recognition of the importance of long-term management of landfill capacity and to reduce the volume of solid waste requiring disposal, the state legislature passed the California Integrated Solid Waste Management Act of 1989 (also known as Assembly Bill [AB] 939). AB 939 requires counties to prepare integrated solid waste management plans, establishes mandatory reductions in the volume of solid waste being landfilled (i.e., a 25 percent reduction by 1995 and a 50 percent reduction by 2000), and requires counties to demonstrate 15 years of landfill capacity.
2. Even with diversion programs that have been implemented under AB 939, it is estimated that Ventura County has only nine years of landfill capacity (County, 1995a). Based on the above factors, VRSD proposes to expand Toland to meet a portion of the long-term landfill capacity requirement for the County, thereby avoiding the environmental impacts associated with the development of a new landfill.

1.2 PROJECT SUMMARY

1.2.1 PROPOSED PROJECT

1. The proposed project is discussed in detail in Chapter 2.0 of the Draft EIR. Under the proposed project, Toland's permitted daily tonnage would increase to 1,500 tpd and an additional 33 acres of the 161-acre site would be used for landfilling operations. Improvements on the adjacent 53-acre parcel (owned by VRSD) that adjoins the landfill on the south would include landfill support facilities (i.e., operations and maintenance center, scalehouse, and stormwater detention basin), as shown in Figure 1.3.
2. The vertical and lateral expansion of the landfill would have a capacity of a maximum of 30 million cubic yards and a maximum of 15 million tons of waste. Figures 1.4 and 1.5 are the preliminary excavation and fill plans for the proposed project. Toland would provide approximately 31 years of capacity based on an annual disposal rate of 462,000 tons. Operations would be expanded to six days per week, Monday through Saturday, and would require a full-time work force of about 40 people.



LEGEND

- POTENTIAL WATER PIPELINE
- ⊕ POTENTIAL WATER WELL
- ⊗ EXISTING WATER WELL

FIGURE 1.3
SITE LAYOUT
TOLAND ROAD LANDFILL
VENTURA REGIONAL SANITATION DISTRICT
ENVIRONMENTAL SOLUTIONS, INC.

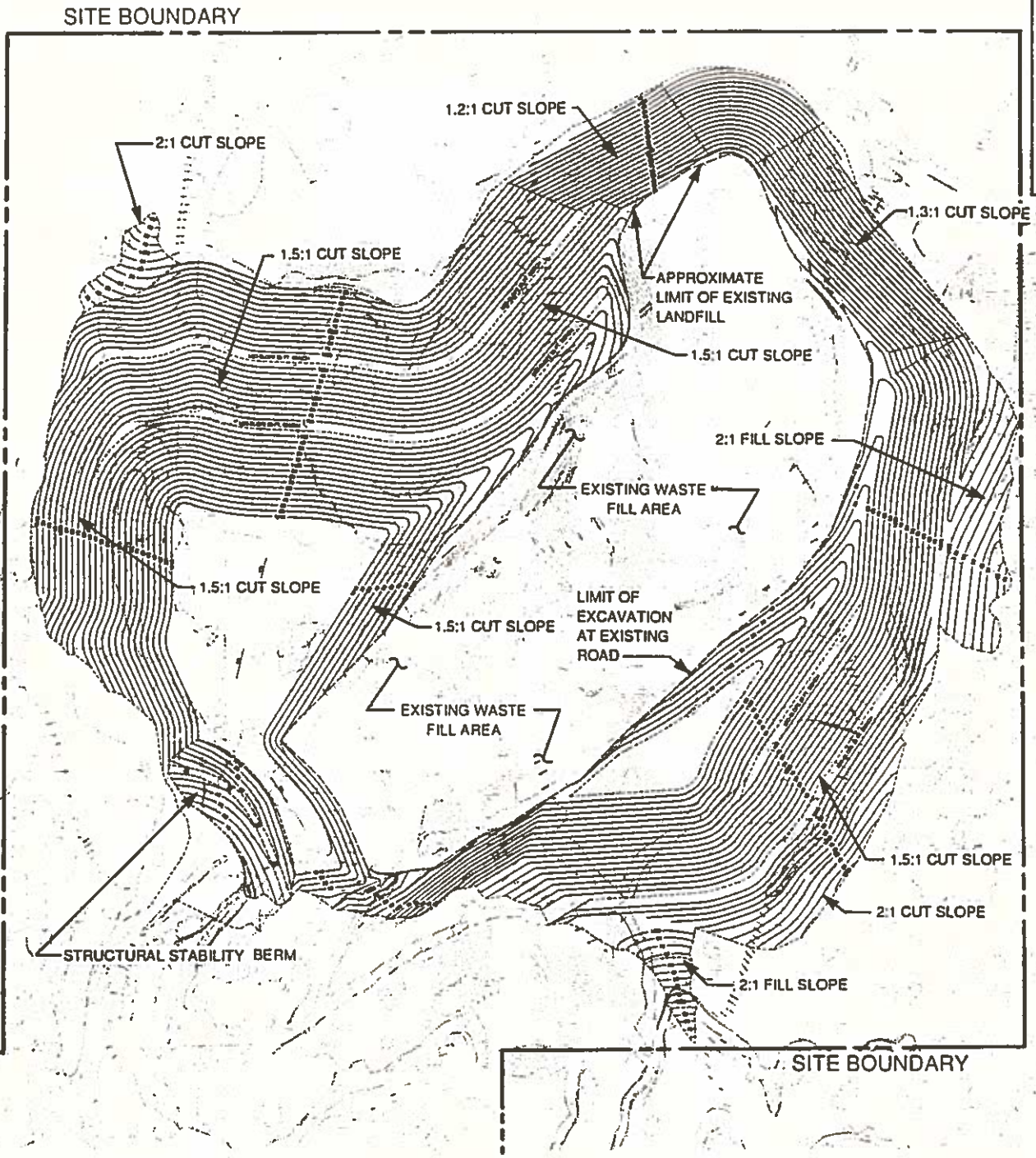
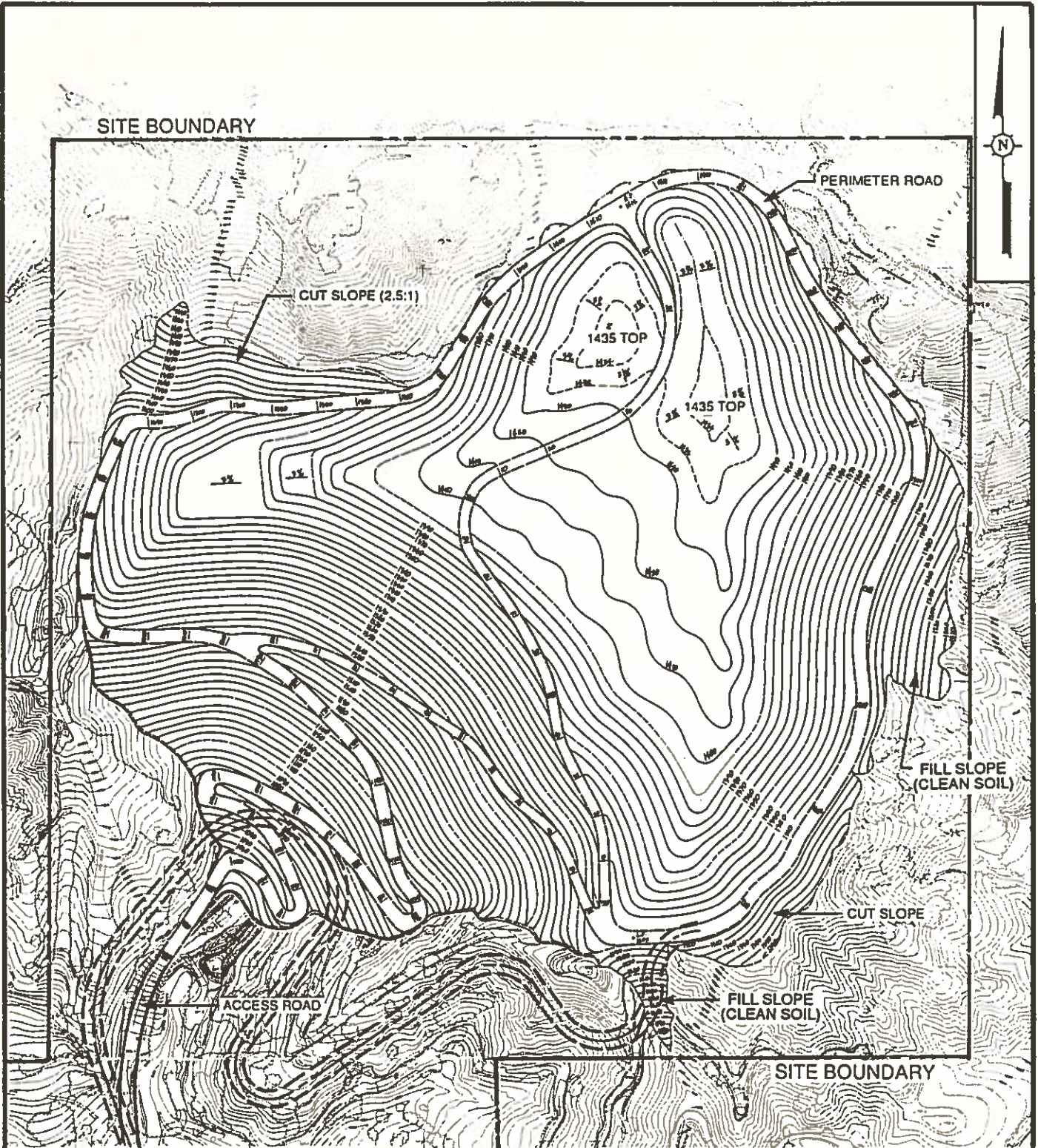


FIGURE 1.4
CONCEPTUAL PRELIMINARY EXCAVATION PLAN
TOLAND ROAD LANDFILL
VENTURA REGIONAL SANITATION DISTRICT
ENVIRONMENTAL SOLUTIONS, INC.



LEGEND

 ALTERNATIVE LANDFILL ACCESS ROAD
 ACCESS ROAD



FIGURE 1.5

PRELIMINARY FILL PLAN

TOLAND ROAD LANDFILL
 VENTURA REGIONAL SANITATION DISTRICT
 ENVIRONMENTAL SOLUTIONS, INC.

3. The proposed project would also include construction of a composite liner, a landfill gas collection system, and leachate collection and removal system (LCRS) to protect water resources in the area. Ground water and landfill gas monitoring systems would also be expanded under the proposed project.
4. Toland would undergo phased closure. In accordance with state and federal requirements, closure and postclosure monitoring and maintenance plans would be prepared to assure that: (1) the landfill would be closed in a manner that protects public health and the environment; and (2) adequate financial resources would be available for closure of the landfill, and postclosure monitoring and maintenance.

1.2.2 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

1. Anticipated environmental impacts of the proposed project were evaluated in Chapter 3.0 of the Draft EIR. Mitigation measures were identified to eliminate or reduce potential significant impacts. These potential impacts and mitigation measures are summarized for each environmental topic in Table 1.1. 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 references purposes, mitigation measures revised or added by this Final EIR are designated by (Final EIR) at the end of the measure in Table 1.1.
2. Implementation of the mitigation measures listed in Table 1.1, is required to make the impact findings included in this EIR. The potential effects of the proposed project would be reduced to below a level of significance with implementation of the mitigation measures with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.
3. These impacts are considered to be significant and unavoidable even after implementation of feasible mitigation measures included in this Final EIR. In accordance with CEQA, specific statements of overriding considerations would be required for these impacts.

TABLE 1.1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

POTENTIAL IMPACTS	MITIGATION MEASURES ⁽¹⁾	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Geology and Soils</p> <p>Ground shaking due to seismic activity could result in the possibility of slope instability or failure and/or damage to other landfill structures and systems. The design of the landfill would take into account the peak ground acceleration from an earthquake on the San Cayetano Fault.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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 of 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 unless control of peak strengths can be demonstrated. • Slope buttresses shall be provided, if necessary, to increase slope stability and reduce deformations. • 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) 	<p>Not significant.</p>

(1) 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.

TABLE 1.1
SUMMARY OF IMPACTS AND MITIGATION MEASURES
(Continued)

POTENTIAL IMPACTS	MITIGATION MEASURES(1)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Geology and Soils (Continued)</p>	<ul style="list-style-type: none"> • 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. • 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. • A maximum setback for clean fill slopes shall be a minimum of 20 feet from the property line. (Final EIR) 	
<p>Water Resources</p> <p>Alteration of existing drainage patterns. Increase in surface flow rate during the 100-year, 24-hour storm event.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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 a 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 the well is located on VRSD property, and the 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 and design of the sideslope liner shall include, as appropriate, methods to collect water from surface water seeps. (Final EIR) 	<p>Not significant.</p>

(1) 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.

TABLE 1.1
SUMMARY OF IMPACTS AND MITIGATION MEASURES
 (Continued)

POTENTIAL IMPACTS	MITIGATION MEASURES ⁽¹⁾	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Water Resources (Continued)</p> <p>If the 30 acre-foot per year of water required by the proposed project is withdrawn from the vicinity of Toland, the proposed project could incrementally contribute to ground water use from the Santa Paula-Sespe Basin. This basin is not in overdraft, but it contributes to aquifers in the Oxnard Plain which is in overdraft due to the long-term withdrawal of ground water for agricultural and municipal use.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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 of 30 acre-feet per year), water usage from wells at VRSD's Bailard and Coastal landfills shall be decreased in like amounts to the greatest feasible extent. To the extent the Bailard 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. The priority in implementing these offset strategies shall be: <ul style="list-style-type: none"> - 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) 	<p>Not significant.</p>

(1) 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.

TABLE 1.1

SUMMARY OF IMPACTS AND MITIGATION MEASURES
(Continued)

POTENTIAL IMPACTS	MITIGATION MEASURES(1)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Biological Resources</p> <p>An onsite surface water seep occurs just outside the proposed limits of disturbance, with a slight extension into the proposed limits of disturbance. Disturbance of the biological resource associated with the seep would be a significant impact.</p> <p>The O'Leary Creek drainage appears to be a locally important wildlife corridor.</p> <p>The proposed project would disturb approximately 2.7 acres of coastal sage scrub, 9.6 acres of ruderal grassland/coastal sage scrub, and 6.4 acres of barren areas. Impacts to native plant communities (i.e., coastal sage scrub) would be to less than 3 percent of this plant community that occurs on the project site.</p>	<p>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:</p> <ul style="list-style-type: none"> • The limits of 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 habitat shall be avoided and left in its natural condition. The landfill slope gradient south of the seep shall be designed to preclude the possibility for landslides due to gravity or storm events. • The bank of 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. 	<p>Not significant.</p>
<p>Utilities, Services and Housing</p> <p>Of the 40 landfill employees required for the proposed layout, it is assumed that 10 percent of these employees (i.e., four to five employees) and their families may potentially move to the Santa Clara Valley from other areas of the County. These additional families would utilize existing utilities (e.g., water, wastewater disposal, electric, gas, telephone), services (e.g., schools, police and fire protection), and housing. Existing utilities, services and housing are adequate to meet the requirements of the four to five new families.</p> <p>The proposed project would incrementally increase the demand for utilities at Toland as follows:</p> <ul style="list-style-type: none"> • Nonpotable water (dust control; irrigation): 30 acre-feet per year. • Domestic water (potable): 8,300 gallons per month. • Wastewater disposal: 8,300 gallons per month. • Electrical power: 13,750 kWh per month. <p>Existing utilities and services infrastructure are adequate to meet the requirements of the proposed project.</p>	<p>The proposed project would not result in significant impacts to utilities and services infrastructure or housing; therefore, no mitigation measures are required.</p>	<p>Not significant.</p>

(1) 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.

TABLE 1.1
SUMMARY OF IMPACTS AND MITIGATION MEASURES
 (Continued)

POTENTIAL IMPACTS	MITIGATION MEASURES ⁽¹⁾	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Cultural Resources</p> <p>A potentially important archaeological site (Ca-Yen-1237) is situated in the southern half of the project site. The disturbance from the proposed project avoids this site.</p>	<p>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:</p> <ul style="list-style-type: none"> • Monitoring of site Ca-Yen-1237 shall be conducted by a professional archaeologist when grading, construction, or other project-related activities are conducted in the immediate vicinity of 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, evaluation, and recovery activities are completed. Construction and landfill personnel should be informed of these requirements. <p>Should future operations or construction design changes be planned that have the potential to affect rockshelter site Ca-Yen-1237, the following actions are recommended to assure that impacts remain below a level of significance: (Final EIR)</p> <ul style="list-style-type: none"> • 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. 	<p>Not significant.</p>

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TABLE 1.1
SUMMARY OF IMPACTS AND MITIGATION MEASURES
(Continued)

POTENTIAL IMPACTS	MITIGATION MEASURES(1)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Paleontological Resources</p> <p>Several rock units at the proposed project site (i.e., Pico and Los Posas Sand) have the potential to contain fossils, but the general sensitivity of the project site is considered to be low to moderate.</p> <p>The Saugus Formation, which also exists at the site, has produced significant vertebrate fossils from exposures in the Santa Clara Valley. Project-related disturbance is not proposed for areas in the Saugus Formation; therefore, the proposed project avoids potential impact to this formation.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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. • 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 to the lowest taxon possible. A report containing monitoring results, including an itemized list of fossils, shall be submitted to 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. 	<p>Not significant.</p>

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TABLE 1.1
SUMMARY OF IMPACTS AND MITIGATION MEASURES
(Continued)

POTENTIAL IMPACTS	MITIGATION MEASURES(1)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Land Use</p> <p>The proposed project is consistent with the County General Plan and is consistent with the General Plan Land Use Map. Therefore, a General Plan Amendment would not be required.</p> <p>With the exception of regional air quality impacts associated with offsite vehicle emissions, and cumulative traffic and noise impacts at the intersection of Toland Road/Highway 126 and the Santa Clara School, respectively, the proposed project would not result in significant impacts. The regional air quality impact, and cumulative traffic and noise impacts do not represent land use impacts.</p>	<p>The proposed project would not result in significant land use impacts; therefore, no mitigation measures are required.</p>	<p>Not significant.</p>
<p>Visual Resources</p> <p>The proposed project would alter the existing appearance and character of the undisturbed portions of the project site. However, as the number of newly disturbed acreage is relatively low and the proposed project represents a continuation of current activities, the visual character of the site would remain relatively constant.</p> <p>The topographic alteration associated with the proposed project would result in some increased visibility of the landfill from some locations in the immediate project area. However, these alterations would not represent a significant visual impact, due to the mountainous character of the surrounding topography, and the screening of the landfill by vegetation and orchards.</p>	<p>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:</p> <ul style="list-style-type: none"> To the extent practicable, disturbed areas and final slopes of the landfill shall be regraded to blend with the surrounding terrain. (Final EIR) 	<p>Not significant.</p>
<p>Noise</p> <p>Noise levels from proposed onsite operations at Toland would not exceed County standards in the vicinity of the landfill. Noise impacts from project-related traffic on Toland Road would exceed 3 dBA.</p>	<p>The following mitigation measures shall be implemented as part of the proposed project:</p> <ul style="list-style-type: none"> 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 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. 	<p>The installation of appropriately designed noise barriers adjacent to the two residences along Toland Road would mitigate noise levels at the residences to acceptable levels (below 60 CNEL). Implementation of this mitigation measure would reduce project-specific noise impacts along Toland Road to below a level of significance.</p>

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TABLE 1.1

SUMMARY OF IMPACTS AND MITIGATION MEASURES
(Continued)

POTENTIAL IMPACTS	MITIGATION MEASURES(1)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Noise (Continued)</p> <p>Both existing and future cumulative traffic-related noise levels on Highway 126 at Santa Clara School exceed County standards. The proposed project's contribution of less than 2.5 percent of the future traffic along this arterial (under the conservative "Worse Case" project scenario) would result in a maximum project-related noise increase of 0.6 dBA at the Santa Clara School.</p>	<p>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.</p>	<p>Impacts of existing and cumulative traffic noise levels on Highway 126 at the Santa Clara School are/would be significant with or without the proposed project. The projected 3 dBA increase along Highway 126 due primarily to the projected increase in non-project-related traffic on this arterial by 2015, would constitute a significant unavoidable cumulative impact and a statement of overriding considerations would be required.</p>
<p>Traffic</p> <p>With the exception of the left turn, southbound movement from Toland Road onto Highway 126, existing intersection movements meet both County standards and County's Congestion Management Plan (CMP) standards without signalization. The existing southbound right and eastbound left movement operate at level of services (LOSs) "A" and "B", respectively, and would continue to operate at acceptable levels with the addition of project traffic and future cumulative traffic (LOS "B" and "C", respectively) without signalization.</p> <p>The southbound left turn movement presently operates at LOS "E" ("early p.m." peak) and "F" (p.m. peak). These LOSs do not exceed CMP standards which identify LOS "E" as the lowest acceptable operation for Highway 126, unless at existing LOS "F." Under the proposed project, this movement would continue to operate at LOS "E" and "F" for the respective movements, and would therefore, not exceed the CMP standard. Under the proposed project, however, this movement would continue to operate at levels below the County standard for a state highway of LOS "D."</p>	<ul style="list-style-type: none"> • 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. 	<p>Project-specific traffic impacts would not be considered significant. Cumulative impacts, which would be significant without mitigation, would be mitigated to below a level of significance with signalization of the Toland Road/Highway 126 intersection. However, since Caltrans and not VRSD has the authority to signalize the intersection, this impact would constitute a significant unavoidable cumulative impact and a statement of overriding considerations would be required.</p>

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TABLE 1.1
SUMMARY OF IMPACTS AND MITIGATION MEASURES
(Continued)

POTENTIAL IMPACTS	MITIGATION MEASURES ⁽¹⁾	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Traffic (Continued)</p>	<p>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:</p> <p><u>With Signalization</u></p> <ul style="list-style-type: none"> - In conjunction with the traffic signal, appropriate signing, striping, and traffic control devices would be implemented to make people aware of the presence of the signal. <p><u>Without Signalization</u></p> <ul style="list-style-type: none"> - 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) <p>These measures would also be subject to Caltrans approval.</p>	
<p>Air Quality</p> <p>The majority of onsite emissions associated with the proposed project reflect a shift in air emissions associated with landfilling at Bailard to Toland. The remaining onsite emissions and increased offsite emissions of NO_x and ROG for the longer travel distance as compared to Bailard represent an increase over baseline air emissions in the County.</p> <p>Onsite operations would not exceed state or federal air ambient standards at or beyond the project boundary, and would not exceed APCD's air quality impact analysis threshold values.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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 life span 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. 	<p>Not significant.</p>

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TABLE 1.1
SUMMARY OF IMPACTS AND MITIGATION MEASURES
(Continued)

POTENTIAL IMPACTS	MITIGATION MEASURES(1)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Air Quality (Continued)</p> <p>The proposed project would result in an increase in vehicle miles traveled to Toland as compared to Bailard. Based on the additional miles traveled, the proposed project would result in a net regional increase in mobile emissions that exceed the APCD's significance threshold of 25 pounds per day of NO_x.</p>	<ul style="list-style-type: none"> • Fugitive dust emissions shall be controlled through some combination of the following: <ul style="list-style-type: none"> - 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. - 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) <p>The following are examples of mitigation measures that could reduce the regional impact associated with offsite mobile emissions:</p> <ul style="list-style-type: none"> • 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. 	<p>The mitigation measures for offsite mobile emissions would reduce these impacts, but may not reduce them to below a level of significance. Therefore, offsite mobile emissions are considered to represent a significant unavoidable impact that would require a statement of overriding considerations.</p>

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TABLE 1.1
SUMMARY OF IMPACTS AND MITIGATION MEASURES
(Continued)

POTENTIAL IMPACTS	MITIGATION MEASURES(1)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Health Risk Assessment</p> <p>Potential toxic air emissions would be minimized through operational procedures, compliance with applicable federal and state regulations, and permit conditions for landfill design, operation and closure/postclosure.</p>	<p>The proposed project would not result in a significant health risk impact; therefore, no mitigation measures are required.</p>	<p>Not significant.</p>
<p>Nuisance</p> <p>Through implementation of operational procedures and regulatory requirements, potential nuisance impacts (vectors and birds, odors, and litter and illegal dumping) to persons and activities in the vicinity of Tolland would be below a level of significance.</p>	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • Posting signs at the landfill entrance and scalehouse noting anti-littering 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, Tolland Road, and along Highway 126 within one-quarter mile to the east and west of the Tolland Road intersection. • Litter control crews shall inspect the landfill fences (permanent and portable fences) on a weekly basis and remove litter. (Final EIR) 	<p>Not significant.</p>

(1) 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.

TABLE 1.1
SUMMARY OF IMPACTS AND MITIGATION MEASURES
 (Continued)

POTENTIAL IMPACTS	MITIGATION MEASURES(1)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p>Nuisance (Continued)</p>	<ul style="list-style-type: none"> • 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) • 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 measures shall be developed. (Final EIR) 	
<p>Health and Safety</p> <p>Potential health and safety concerns would be minimized by adherence to VRSD procedures, federal and state regulations and permit conditions for landfill design, operation and closure/postclosure to a point where impacts are not significant.</p>	<p>The proposed project would not result in a significant health and safety impact; therefore, no mitigation measures are required.</p>	<p>Not significant.</p>

(1) 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.

1.2.3 COMPARISON OF IMPACTS FOR PROPOSED PROJECT AND ALTERNATIVES

1. Environmental evaluations included in this EIR address the proposed project at Toland. Pursuant to Section 15126 of the CEQA Guidelines, alternatives were evaluated (see Chapter 4.0 of the Draft EIR) to determine if they could eliminate or reduce potentially significant environmental impacts associated with the proposed project, while still meeting the basic project objectives (see Section 1.1.2). The alternatives evaluated are as follows:

- **Diversion to In-County Landfill.** This alternative considers the potential for waste to be diverted to Simi Valley Landfill, which upon closure of Bailard, will be the only operating in-county landfill other than Toland.
- **Diversion to Out-of-County Landfill (by truck).** Under this alternative, waste generated in the west County and in the Santa Clara Valley could be transported by truck to a landfill located in an adjacent county. This alternative considers existing landfills, proposed landfill expansions, and potential new landfills in Los Angeles and Santa Barbara counties.
- **Rail Haul Projects.** Under this alternative, waste generated in the west County and the Santa Clara Valley would be transported via rail to remote desert landfills. The evaluation considers rail haul to the proposed Bolo Station, Mesquite Regional, or Eagle Mountain landfills in the desert of southern California, and to the existing Carbon Canyon Landfill in Utah.
- **Offsite Alternative Location.** Under this alternative, a new landfill would be sited and developed in the County.
- **Resource Recovery Alternatives.** This section reviews the potential for solid waste management technologies to reduce the volume of waste requiring landfill disposal, including: source reduction, recycling, composting, and waste transformation (waste-to-energy). Under these alternatives, unprocessed residual waste or processing by-products would still require landfilling.
- **Reduced Project Alternative.** Under this alternative, the proposed expansion of Toland would accept a maximum of 1,000 tons of waste per day, compared to the proposed project which would be permitted to receive up to 1,500 tons per day. In addition, the capacity of the expansion of Toland would be reduced to 7.5 million cubic yards compared to the proposed projects' capacity of 24 million cubic yards.
- **No Project.** Under this alternative the proposed expansion of Toland would not occur. For purposes of this EIR, it is assumed that, upon the closure of Bailard in the summer of 1996 Toland would also close.

1.2.3.1 Impact Comparison

1. As discussed in Chapter 4.0 of the Draft EIR, none of the alternatives can meet all of the objectives of the proposed project. In addition, none of the alternatives would eliminate or

reduce significant impacts associated with the proposed project at Toland. In fact, as discussed in Chapter 4.0 of the Draft EIR, the alternatives would have similar or greater environmental impacts than the proposed project.

1.2.3.2 Environmentally Superior Alternative

1. If the environmentally superior alternative is the No Project alternative, Section 15126(d) of the CEQA Guidelines requires that the environmentally superior alternative, among the remaining alternatives, be identified. As discussed in Chapter 4.0 of the Draft EIR, based on the review of the alternatives to the proposed project, the No Project alternative was not determined to be the environmentally superior alternative. In addition, none of the other alternatives were determined to be environmentally superior to the proposed project.

1.3 ENVIRONMENTAL REVIEW PROCESS

1. CEQA requires state and local government agencies to consider the environmental consequences of projects over which they have discretionary authority, prior to taking action on those projects. Additionally, a public agency is required to prepare an EIR if it determines that a proposed project has the potential to adversely affect the environment. In accordance with Section 15051(a) of the CEQA Guidelines, as the agency with the primary responsibility for carrying out the proposed project, VRSD is the lead agency and has determined that an EIR is required for the proposed project.
2. This Final EIR has been prepared in accordance with CEQA. Guidance for preparation of this document was obtained from VRSD (1990), the County (1994a), and CIWMB (1994a). This EIR will be used by various local and state agencies in their consideration of actions required to: (1) approve; (2) approve with conditions or modifications; or (3) deny the proposed project. This EIR is intended to provide the public, agencies and decision makers with a comprehensive analysis of:
 - Potential environmental consequences of the proposed project.
 - Potential mitigation measures to avoid or reduce impacts.
 - Feasible alternatives to the proposed project.

The level of technical detail, evaluation, and analysis included in this EIR is consistent with CEQA and is sufficient to provide an understanding of the potential impacts.

3. CEQA encourages incorporation of information by reference as a means of shortening EIRs. This EIR, therefore, incorporates by reference information from relevant studies and other EIRs as appropriate.
4. The EIR is the initial phase of the process for issuance of various permits or approvals for the proposed project. The second phase, portions of which are occurring concurrently with the EIR, is the preparation of appropriate applications for permits or approvals. Requirements that are anticipated for these permits are considered in this EIR. VRSD recognizes, however, that additional documentation, analyses and design may be required to complete the permit applications. The third and final phase is public and agency review of permit applications, development of specific permit conditions, and issuance of permits by the agencies. This phase may result in modification to the proposed project to meet various regulatory requirements or permit conditions.

1.3.1 FINAL EIR REQUIREMENTS

1. This Final EIR is a continuation of the environmental process that began with the preparation of an Initial Study and Notice of Preparation (see Appendix A of the Draft EIR). The Draft EIR was distributed on September 21, 1995, for a 45-day public review and comment period that ended on November 6, 1995.
2. Section 15132 of the CEQA Guidelines requires that a Final EIR consist of:
 - The Draft EIR or a revision of the draft.
 - Comments and recommendations received on the Draft EIR, either verbatim or in summary.
 - A list of persons, organizations, and public agencies commenting on the Draft EIR.
 - The responses of the lead agency to significant environmental points raised in the review and consultation process.
 - Other information added by the lead agency.

1.3.1.1 Contents of the EIR

1. The contents of the EIR are briefly summarized as follows:
 - **Draft EIR:** The Draft EIR provided a detailed description of the proposed project and a comprehensive analysis of the potential environmental consequences of the proposed project. The existing environment was described, and environmental issues of concern that were identified by the Initial Study were analyzed. Mitigation measures developed for each identified adverse effect were specified. Alternatives

to the proposed project were evaluated for feasibility and environmental effect. Potential cumulative effects of the proposed project, combined with other existing or future activities in the area, were evaluated.

- **Final EIR:** This document includes the public and agency comments on the Draft EIR and specific responses to those comments (see Chapter 2.0). This Final EIR describes how the environmental documentation will be used in the decision-making process and provides a record of the public review process for this project.

This Final EIR has been filed by VRSD with the California State Clearinghouse. Notification of the availability of this Final EIR has been provided to the public, agencies, groups, and individuals (see Chapter 7.0).

2. A Mitigation Monitoring Program has been prepared for the proposed project in accordance with Section 21081.6 of CEQA. The VRSD Board of Directors will consider the Mitigation Monitoring Program during its certification hearing for the EIR.
3. For a complete understanding of the proposed project, its potential effects, mitigation measures and alternatives, the reader is encouraged to review the Draft EIR and this Final EIR in their entirety.

1.3.2 FINAL EIR PROCESS

1. The following summarizes the EIR process as it relates to the proposed project:
 - **Notice of Preparation/Initial Study** - Public notification to prepare an EIR is provided so that the public and interested agencies can participate in the CEQA process, if desired, through comments during the scoping and public review process. An Initial Study was prepared to define the environmental issues to be addressed in the EIR. The Notice of Preparation/Initial Study was distributed to potentially interested agencies and individuals on March 2, 1995, for a 30-day review.
 - **Public Scoping Meetings** - Public scoping meetings were held on March 15 and 16, 1995, to provide an opportunity for the public and agencies to submit verbal statements on issues to be addressed in the EIR. Notifications of the meetings included: (1) notice to local and regional media sources; and (2) direct mailing of an announcement by VRSD. Those not able to attend were invited to submit written comments.
 - **Preparation of the Draft EIR** - The Draft EIR was prepared to identify, describe, and analyze the environmental issues of the proposed project.
 - **Public Release of the Draft EIR** - The Draft EIR was released on September 21, 1995 for a 45-day review to the public, including interested individuals, groups, government representatives and agencies. The availability of the Draft EIR was noticed by VRSD with a Notice of Completion sent to the California Office of Planning and Research.

- **Public Meeting** - A public meeting was held by VRSD on October 19, 1995 during the 45-day review period, to provide the public with an opportunity to verbally comment on the Draft EIR.
- **Preparation of the Final EIR** - This Final EIR has been presented to respond to comments received as a result of the public review of the Draft EIR.
- **Distribution of the Final EIR** - This Final EIR is being distributed by VRSD for a 10-day notification period.
- **Notice of Determination** - The VRSD Board of Directors will hold a public hearing to consider certification of the EIR, make its decision regarding the proposed project, and prepare and file a Notice of Determination with the State Clearinghouse.

1.4 FINAL EIR FORMAT

1. The remainder of this Final EIR is organized under the following chapter headings:
 - **2.0 Specific Responses to Comments on the Draft EIR.** This chapter includes public and agency comments and responses to these comments on the Draft EIR.
 - **3.0 Changes to the Draft EIR.** This chapter includes minor changes to the Draft EIR. These changes elaborate on or clarify information presented in the Draft EIR. This elaboration and clarification has not altered the findings or conclusions of the EIR.
 - **4.0 Persons and Organizations Consulted.** This chapter provides a list of the persons or organizations who contributed to the preparation of the Final EIR.
 - **5.0 List of Abbreviations.** A list of abbreviations as they are used in the Draft EIR and this Final EIR is provided.
 - **6.0 References and Resources.** A list of the references used to prepare the Draft EIR and this Final EIR is included in this chapter. References are called out in an abbreviated format throughout the document.
 - **7.0 Final EIR Mailing List.** A list of agencies, groups, and interested individuals who received a copy of this Final EIR or were notified of the availability of the document.

2. The following appendices to this Final EIR are included:
 - **Appendix A:** Operational Procedures and Regulatory Requirements, and Mitigation Measures
 - **Appendix B:** Air Quality Emissions Data
 - **Appendix C:** Surface Water Seeps
 - **Appendix D:** Hydrology Calculations
 - **Appendix E:** Water Agreement
 - **Appendix F:** Agricultural Impact Report

3. Copies of the Draft EIR and this Final EIR are available for public review at the following locations:

- Ventura Regional Sanitation District
1001 Partridge Drive, Suite 110
Ventura, California
- Fillmore City Hall
524 Sespe Avenue
Fillmore, California
- Santa Paula City Hall
970 Ventura Street
Santa Paula, California
- Libraries
 - County of Ventura
Public Law Library
800 South Victoria Avenue
Ventura, California
 - Fillmore Public Library
502 2nd Street
Fillmore, California
 - Santa Paula Public Library
119 North 8th Street
Santa Paula, California
 - E. P. Foster Library
651 East Main Street
Ventura, California
 - Camarillo Library
3100 Ponderosa Drive
Camarillo, California
 - Ray Prueter Library
510 Park Avenue
Port Hueneme, California
 - Oxnard Library
251 South A Street
Oxnard, California
 - Ojai Library
111 E. Ojai Avenue
Ojai, California
 - Thousand Oaks Library
1401 E. Janss Road
Thousand Oaks, California

4. A copy of this Final EIR is available for reproduction at the following location:

- Kinko's Copies
4360 East Main Street
Ventura, California

Please note, persons requesting a copy of this Final EIR at the above location are responsible for the cost of reproduction.

CHAPTER 2.0
SPECIFIC RESPONSES TO COMMENTS
ON THE DRAFT EIR

2.0 SPECIFIC RESPONSES TO COMMENTS ON THE DRAFT EIR

1. This chapter provides specific responses to public and agency comments on the Draft EIR. Approximately 100 copies of the Draft EIR were distributed by VRSD to agencies, organizations, and the public. Chapter 8.0 of the Draft EIR provided the mailing list for the Draft EIR. The mailing list for this Final EIR augments the mailing list for the Draft EIR (see Chapter 7.0 of this Final EIR).
2. VRSD received 60 letters which provided comments on the Draft EIR. In addition to the letters, VRSD received oral comments on the Draft EIR at a public meeting held in Santa Paula on October 19, 1995.
3. Included in this chapter is a copy of each comment letter and the transcript from the public meeting. The comment letters have been organized by state/regional agencies, county agencies, local agencies, organizations/business, individuals, and public meeting transcript. Each letter and the transcript has been assigned a two-digit document control number (e.g., 01), and specific comments within each letter have been assigned a sequential comment number (e.g., 01-1). Table 2.1 provides a listing of the comment letters received and their corresponding document control numbers.
4. Sections 2.1 through 2.6 include the comment letters and public meeting transcript, and specific responses to each comment. Some of the comments were found to address identical issues or concerns. To provide consistency and aid in the review of this Final EIR, standard responses were developed and incorporated, as appropriate, in response to such recurring comments.
5. In responding to comments on the Draft EIR, it was determined in some instances that clarification of the text or information included in the Draft EIR was appropriate. When clarification of the Draft EIR is provided as part of a specific response, the response refers the reader to Chapter 3.0 of this Final EIR for the clarification to the Draft EIR. As discussed in Section 1.0 of this Final EIR, the Draft EIR and this Final EIR together comprise the EIR in its entirety in accordance with PRC Section 2100 et seq. Therefore, to the extent responses provide clarifications to the Draft EIR, the clarifications included in Chapter 3.0 of this Final EIR are deemed to be incorporated into the relevant sections of the Draft EIR.

TABLE 2.1
LIST OF COMMENTERS TO THE DRAFT EIR

DOCUMENT NUMBER	COMMENTER
STATE/REGIONAL AGENCIES (See Section 2.1)	
• 01	California State Clearinghouse, Governor's Office of Planning and Research
• 02	California Department of Transportation
• 03	California Integrated Waste Management Board
• 04	California Regional Water Quality Control Board - Los Angeles Region
COUNTY AGENCIES (See Section 2.2)	
• 05	County of Ventura Board of Supervisors
• 06	Ventura County Agricultural Commissioner Jim Fullmer - Deputy Agricultural Commissioner
• 07	Ventura County Air Pollution Control District Chuck Thomas
• 08	Ventura County Environmental Health Division, Solid Waste Section Terrence O. Gilday - Manager
• 09	Ventura County Fire Protection District R.M. Sims
• 10	Ventura County, General Services Agency - Recreation Services Theresa Lubin - Program Administrator
• 11	Ventura County Planning Division Lynne Kada
• 12	Ventura County Planning Division Bruce Smith - Manager, General Plan Section
• 13	Ventura County Public Works Agency Rich Guske
• 14	Ventura County Solid Waste Management Department Christy Madden
• 15	Ventura County Transportation Commission Ginger Gherardi - Executive Director
LOCAL AGENCIES (See Section 2.3)	
• 16	City of Fillmore Linda Brewster - City Council Member
• 17	City of Fillmore J. Roger Myers - City Attorney
• 18	Santa Clara School Mary Marsh - Principal
• 19	United Water Conservation District Steve Bachman

TABLE 2.1
LIST OF COMMENTERS TO THE DRAFT EIR
(Continued)

DOCUMENT NUMBER	COMMENTER
ORGANIZATIONS/BUSINESS (See Section 2.4)	
• 20	Calavo Paul A. Romero
• 21	Coalition to Stop Weldon Canyon Dump Chris R. Westphal
• 22	Kimball Ranches - El Hogar Gordon E. Kimball
• 23	Muengenburg, Norman & Dowler Robert M. Sawyer
• 24	Santa Paula Chamber of Commerce John Macik, III - Chairman
• 25	Santa Paula Chevrolet John Macik
• 26	Simi Valley Landfill and Recycling Center Danilo F. Vidal
• 27	Turner Properties Kathleen Turner
INDIVIDUALS (See Section 2.5)	
• 28	Charlene S. Bailey
• 29	Linda Bartelson
• 30	Dorothy Brandt
• 31	Steven Brooks
• 32	James F. Brucker
• 33	Dora P. Crouch, Ph.D.
• 34	Bennett R. Curtis
• 35	Heather M. Davis
• 36	Larry and Shirley Diamond
• 37	Shirley A. Diamond
• 38	Trygve I. Forland, M.D.
• 39	James Heighton
• 40	John V. Hogan
• 41	Molly S. King
• 42	Chet M. Koski
• 43	Scott Lee
• 44	Claudia and Robert Leidecker/Windy and Scott Hatton

TABLE 2.1
LIST OF COMMENTERS TO THE DRAFT EIR
(Continued)

DOCUMENT NUMBER	COMMENTER
INDIVIDUALS (See Section 2.5) - continued	
• 45	George Lindegren
• 46	Kathy Long
• 47	Marjorie A. Miller
• 48	Anita Nelson
• 49	Doug Nelson
• 50	Mary Alice Orcutt Henderson
• 51	Betty Pinkerton
• 52	James M. Rescoe
• 53	Alice B. Romero, R.N.
• 54	Janette H. Romney
• 55	Richard E. Seigler
• 56	Douglas Smith
• 57	Susan Stephenson
• 58	Fred Strickland
• 59	Ashby and Carolyn Vickers
• 60	Ellen Wolff Wimmer
PUBLIC MEETING TRANSCRIPTS (See Section 2.6)	
• 61	Various

SECTION 2.1

**STATE/REGIONAL AGENCIES
COMMENTS AND RESPONSES**

Governor's Office of Planning and Research

1400 Tenth Street
Sacramento, CA 95814

November 6, 1995

CLINTON L. WHITNEY
VENTURA REGIONAL SANITATION DISTRICT
1001 PARTRIDGE DRIVE
SUITE 110
VENTURA, CA 93003

Subject: TOLAND ROAD LANDFILL SCH #: 95031009

Dear CLINTON L. WHITNEY:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is/are enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation.

These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Antero A. Rivasplata

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Enclosures
cc: Resources Agency

RECEIVED
NOV 13 1995
ACCOUNTING

Notice of Completion

Form A

Head In: Sus Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 916445-0613

Project Title: Toland Road Landfill
Lead Agency: Ventura Regional Sanitation District
SCH #: 95-031009
City: Ventura
County: Ventura
Project Location: Toland Road Landfill
Project Manager: [Name]
Phone: (805) 658-4600

Project Location: Santa Fe Light/Wireless
City: Ventura
County: Ventura
Census Tract: 53031
Map Sheet: 20
Section: 20
Range: 20N
Township: 4N
County: SERRA
State Highway: SERRA
Waterways: Santa Clara River
Soils: SLE R, R
Bathymetry: [Blank]
Schools: [Blank]
Total Acres: 214
Map: S11111

- Document Type: NRP, Early Class, Neg Doc, Draft EIR
- Local Action Type: Specific Plan, General Plan, etc.
- Development Type: Residential, Commercial, Industrial, etc.
- Water Facilities: Sewer, Storm, etc.
- Water Quality: WQ, WQS, etc.

- Project Issues Discussed in Document: Air Quality, Noise, etc.
- Present Land Use/Zoning/General Plan Use: Municipal Solid Waste Landfill

Project Description: Vertical and lateral expansion, and an increase in daily waste tonnage from 133 tons per day to 1500 tons per day at an existing Class III landfill.

- State Clearinghouse Contact: Mr. Chris Bobly (916) 445-0613
- State Review Began: 9-21-95
- Dept. Review to Agency: 10-30
- Agency Review to SCH: 11-3
- SCH COMPLIANCE: 11-6
- Project Sent to the following State Agencies: Resources, Building, Coastal Ocean, etc.

**DOCUMENT 01
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE
RESPONSE TO COMMENTS**

Response 01-1

1. This letter confirms that the State Clearinghouse review has been completed and lists the state agencies that received a copy of the Draft EIR. The letter from the State Clearinghouse provides no specific comments on the Draft EIR.



DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3600
100 (213) 897-4410

DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3600
100 (213) 897-4410

DEPARTMENT OF TRANSPORTATION



DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3600
100 (213) 897-4410

DEPARTMENT OF TRANSPORTATION

October 13, 1995

November 1, 1995

Environmental Solutions, Inc.
21 Technology Drive
Irvine, CA 92718

IGR/CEQA 9033
DEIR
Toland Road Landfill
Expansion Project
Vic: Ven-126-R15.99

Attention: Ms. JoAnn Hadfield

JoAnn Hadfield
Environmental Solution, Inc
21 Technology Drive
Irvine, California 92718

Re: Traffic Study for Toland Road Landfill Expansion Project

Dear Ms. Hadfield:

Dear Ms. Hadfield:

We have reviewed the revised traffic study for this project and we concur that no signal warrants were met. We will not be requiring the developer to install traffic signals at the Route 126/Toland Road intersection.

In reference to our letter to you dated October 13, 1995, we would like to add the following comment: we recommend that all the mitigation measures without signalization be implemented.

We recommend, however, that an Intersection Control Flashing Beacon with a flashing circular yellow indication for each through lane be installed. These flashing beacons shall operate only during the landfill operation hours from 6:00 a.m. to 6:00 p.m. We met with the Santa Clara School authorities on October 12, 1995 and obtained concurrence from them to remove the existing school flashing beacon since the school hours from 8:15 a.m. to 2:30 p.m. can be covered by the landfill operations hours. Basic intersection lighting should also be installed at this intersection. The existing crosswalk will remain in place.

Should you have any questions, please call me at (213) 897-4429.

Should you have any questions, please call Manny Mendoza at (213) 897-0248.

Sincerely,

Luu Nguyen, P.E.
Senior Transportation Engineer
Office of Traffic Investigations

Sincerely,

Steve Buswell
IGR/CEQA Coordinator
Transportation Planning

Copy furnished:

Jim Renshaw - Ventura Permit Office
Steve Buswell- Transportation Planning

DOCUMENT 02
CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)
RESPONSE TO COMMENTS

Response 02-1

1. VRSD agrees to implement the following traffic mitigation measures at the intersection of Highway 126 and Toland Road as recommended by Caltrans in its comment letter:
 - Intersection control flashing beacon.
 - Timing of beacon to operate only during landfill operation hours.
 - Basic intersection lighting.

The first two mitigation measures were included in the Draft EIR. To respond to this comment, basic intersection lighting has been included as a mitigation measure in the EIR. Final design for the beacon and intersection lighting will be determined in consultation with Caltrans. The inclusion of this mitigation measure in this Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the project.

Response 02-2

1. In addition to the intersection control flashing beacon and intersection lighting as specified in Response 02-01, VRSD agrees to implement the following traffic mitigation measures, without intersection signalization, included in the Draft EIR:
 - Installation of W51, "SLOW TRUCKS" signage on Highway 126 in advance of the intersection to warn motorists of the presence of project-related trucks.
 - Signage on Highway 126 to clearly indicate the existence of the Toland Road intersection.

The location of recommended signs will be submitted for review and approval by Caltrans.

MEMORANDUM

To: Mr. Chris Belsky
State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

Date: November 3, 1995

RECEIVED

General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003-5562

NOV 08 1995

V. R. S. D.

From:

William R. Johnson
William L. Ishmael, WMS
Environmental Review Section
Permits Branch
Permitting and Enforcement Division
CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

Subject: SCH #95031009: Draft Environmental Impact Report (DEIR) for approval of a proposed vertical and lateral expansion, increase in daily tonnage, and closure and postclosure plans at Toland Road Landfill (Toland, or landfill), Ventura County (SWFP# 56-AA-0005)

California Integrated Waste Management Board (CIWMB) Environmental Review Section (ERS) staff have reviewed the DEIR for the proposed project cited above and offer the following description of the project, as understood by ERS staff, based on our interpretation of the submitted DEIR. If there are any significant differences between the actual project and the project as understood by ERS staff, the Lead Agency should clarify these differences. ERS staff questions and comments pertaining to the environmental evaluation of the proposed project are included in this letter.

PROJECT DESCRIPTION

The County of Ventura Regional Sanitation District (VRSD), acting as Lead Agency, has prepared this DEIR to support approval of the modification or revision of: Ventura County Conditional Use Permit (CUP) #3141; Solid Waste Facility Permit (SWFP) #56-AA-0005; and Waste Discharge Requirements (WDRs) #70-22. VRSD is the owner and operator of the Toland Road Landfill.

Toland is an existing, unlined Class III municipal solid waste landfill, located at 3500 North Toland Road, between the cities of Santa Paula and Fillmore in the unincorporated area of Ventura County. The Landfill is located on County Assessor's Parcel No.

041-140-095. VRSD also owns an approximate 53 acre adjoining parcel to the south of the landfill (Assessor's Parcel No. 041-140-105). While not part of the currently permitted landfill, this adjoining parcel is included as part of the proposed project. Access to the site is via State Highway 126 and Toland road. Toland began operation in 1970 under an agreement between Ventura County (County) and the cities of Fillmore and Santa Paula. Two years later VRSD became the leaseholder and operator. The adjoining 53-acre parcel was added in 1988.

Under the existing permits and supporting CEQA evaluations:

- ▶ Toland is permitted to receive 135 tons per day (tpd) of nonhazardous solid waste;
- ▶ the landfill currently has a maximum of 70 vehicles per day transporting waste to the facility;
- ▶ the waste stream consists of residential waste, commercial waste, industrial waste, street sweepings, small dead animals, dried municipal sewage sludge cake, agricultural residues, triple rinsed pesticide containers, and construction and demolition debris.
- ▶ operating hours are from 8:00 a.m. to 4:00 p.m., Monday through Friday, for commercial haulers, private haulers, and the general public;
- ▶ approximately 53 acres of the 161-acre site are currently planned for the disposal of waste;
- ▶ the landfill is permitted to be filled to a maximum elevation of 1,225 feet above mean sea level (MSL), exclusive of final cover;
- ▶ As of the date of the 1992 SWFP, the facility had a permitted capacity of 6.0 million cubic yards (c.y.), or approximately 2.5 million tons of waste;
- ▶ the landfill has a remaining permitted capacity of 4.0 million c.y. (approximately 1.9 million tons of waste), as of June 1994;
- ▶ at the current rate of disposal, Toland has a projected life expectancy of 50 years (to 2045); and
- ▶ under the existing SWFP, the facility is permitted to export up to 250,000 cubic yards of low permeability soil to the Bailard Landfill, Coastal Landfill, or the Santa Clara Landfill at a rate not to exceed 75 truck loads per operating day.

Toland is located in a confined, V-shaped canyon that joins with a larger, southerly trending canyon on the north side of the Santa Clara Valley. The existing land use to the west, south, and east of the site consists of open space, and citrus and avocado orchards. There are two existing residences on Toland

Road; and two other residences in relative proximity to the landfill, one approximately 2,100 feet to the southeast from the proposed landfill footprint, and one approximately 2,300 feet to the southwest of the footprint.

The Santa Clara School is located on the south side of State Highway 126 (highway), just west of the Toland Road intersection with the highway. This is a one-room elementary school that accommodates approximately 35 students.

Toland Park is a 235 acre, County owned, recreational park with restricted use, located on Toland Road approximately one-half mile south of the existing landfill scalehouse. The park is currently zoned for Urban and Building Land (D).

The Toland Road-State Highway 126, intersection is an unsignalized intersection with a stop sign for southbound traffic on Toland Road, and a left turn, turnout lane for east bound traffic on highway 126.

PROPOSED PROJECT

Under the proposed changes in design and operation, the landfill would be permitted to:

- ▶ Increase daily tonnage from 135 tpd to 1,500 tpd.
- ▶ Receive a total of 210 vehicles per day. This figure includes an estimated 150 vehicles per day transporting to the site, and 60 vehicles per day projected for employees and visitors. To assure that maximum traffic impacts from the proposed project are addressed, the EIR analyzes the potential impacts associated with the "worst case" scenario of 450 vehicles per day travelling to the landfill, as well as the impacts associated with the "proposed case" of 210 vehicles per day travelling to the landfill.
- ▶ Allow receipt of: residential waste, commercial waste, industrial waste, agricultural waste, and other waste that may require special handling. The project proposes to divert source-separated green and wood waste from the incoming waste stream for use as alternative daily cover (ADC) or soil amendment at Toland. Tires may be shredded and landfilled or recycled. VRSD also proposes to operate a white goods and metallic recovery program, and to remove freon from refrigeration appliances.
- ▶ Increase hours of operation to 6:00 a.m. to 6:00 p.m. for commercial and private haulers, and from 8:00 a.m. to 4:00 p.m. for the general public six days per week. The landfill would be closed on Sundays and on New Year's, Independence, Thanksgiving and Christmas Days.
- ▶ Increase the landfill footprint by an additional 33 acres. Lateral expansion would involve grading and excavation of the side slopes of the canyon and is expected to provide

sufficient quality and quantities of daily, intermediate, and final cover for the expanded landfill.

- ▶ Increase the final elevation of the landfill from 1,225 feet above MSL to 1,435 feet above MSL. This would result in a vertical expansion of 210 feet, including final cover. At the time of closure the landfill would have a depth of waste of approximately 300 feet, including existing waste in place.
- ▶ Modify the currently permitted fill plan to provide approximately 24 million c.y. of additional capacity to accommodate about 12.5 million tons of additional waste. This would increase the total remaining landfill capacity to approximately 30 million c.y.
- ▶ At a projected annual disposal rate of 462,000 tons, the landfill is expected to reach capacity in 31 years (2026).
- ▶ Route waste from Oxnard, Port Hueneme, Ventura, Camarillo, Ojai and the surrounding unincorporated areas through a transfer station. Two transfer stations are currently planned to be operational by 1996 in the cities of Ventura and Oxnard. Residual waste from transfer stations (1,300 tpd) would be consolidated and transported to Toland by transfer trucks.
- ▶ Include construction of a composite liner system, and a leachate collection and removal system (LCRS) under the areas proposed for expansion of the landfill footprint (i.e., areas that have not received waste as part of the current operation). This liner and LCRS system is to be coordinated with the regulatory agencies (RWQCB, CIWMB, and LSA). The groundwater and landfill gas monitoring systems would also be expanded under the proposed project. A landfill gas collection system will be required at Toland whether or not the expansion is approved.
- ▶ For phases of the proposed project in which waste would be placed on areas that have previously received waste, a 1-foot thick, low permeability intermediate soil barrier (1x10⁻³ cm/sec) would be installed over the existing waste. A landfill gas collection system would be placed beneath the intermediate soil barrier to remove gas from the waste already in place. A LCRS would be installed on top of the intermediate soil barrier to remove leachate from the overlying waste to be placed as part of the proposed project.
- ▶ Employ a full-time work force of approximately 40 people to cover the six days per week the landfill is proposed to be open. During the week, it is projected that the peak shift would include approximately 25 people.
- ▶ Operate additional landfill equipment, such as dozers, compactors, motor graders and scrapers. These additional vehicles are listed in Table 2.5 of the DEIR.

Include the 53-acre adjoining parcel into the permitted landfill site and in the modified CUP (3141). While waste would not be disposed on this parcel, VRSD plans to construct support facilities, including a scale house, an operations and maintenance center, and a stormwater detention basin, on this property.

Construct and install an on-site landfill gas flare station to burn landfill gas collected by the landfill gas recovery system.

Preliminary closure and postclosure plans will be prepared and submitted as part of the application for revision of the SWFP for the proposed project.

CALIFORNIA ENVIRONMENTAL ACT REVIEW

CEQA compliance is required for the establishment, expansion, or change in operation(s) of a Solid Waste Facility (SWF) requiring the issuance of, or changes to a SWFP.

CIMWB staff's review of an environmental document (ED) is to help decision-makers 1) identify potential impacts from proposed projects, 2) determine whether any such impacts are significant, and 3) ascertain whether significant impacts can be mitigated to a level of insignificance in compliance with CEQA statutes and guidelines. In order for CIMWB staff to ascertain that the ED is adequate for use in the CIMWB permitting process, the proposed project must be described in sufficient detail and the potential environmental impacts must be identified clearly in the environmental assessment and offer "mitigating measures, if any, included in the project to avoid potentially significant effects," pursuant to CEQA Guidelines, Section 15071(e). When a potential significant environmental effect is identified and an argument is made as to why no mitigation is necessary, supporting documentation and/or studies should be specifically referenced and made available for review or included in the ED to support such declarations (see 1994 revisions to CEQA Guidelines Section 15063 (d)(3)).

CEQA ANALYSIS AND SWFP CONDITIONS

When determining the adequacy of an ED for purposes of SWFP concurrence, CIMWB staff must compare the design and operation of the facility as described in the proposed SWFP with the project as evaluated in the ED. The first question we must ask is: does the CEQA evaluation for potential impacts resulting from the project thoroughly assess the potential primary and secondary impacts to the environment and/or public health and safety? The second question asked when the proposed permit is received by CIMWB is: does the CEQA evaluation in the ED support the design and operating conditions outlined in the proposed permit? For instance, does the ED assess the potential traffic, noise, dust, vector, and other impacts that can be associated with a significant increase in permitted throughput tonnage requested in a SWFP? When this type of information is included and addressed in the ED, the CEQA process is greatly facilitated. Without

specific information in the project description or elsewhere in the ED, it becomes very difficult for CIMWB staff to answer these questions and to judge the adequacy of the ED for CIMWB purposes.

QUESTIONS AND COMMENTS

Since the CIMWB will be one of the agencies involved in the discretionary approval process for this SWFP, CIMWB ERS staff will perform an independent environmental analysis for this project, using the final ED developed by the Lead Agency. In order to help identify environmental issues that should be addressed in the ED for the purposes of CIMWB environmental evaluation, ERS staff asks that the comments and questions listed below be considered and addressed in the final EIR prior to project approval.

These questions and comments are:

Page 2-24 of the DEIR indicates that the use of alternative daily cover (ADC) is being considered at the landfill. As noted, a demonstration project and on-going use of ADC would require approval by the RMQCB and the LEA. The Lead Agency should be aware that CEQA compliance may be necessary for one or both of these approvals. These agencies should be consulted to see if a CEQA evaluation needs to be completed for the use of ADC at this landfill, and if so, should this evaluation be included in this CEQA document or a separate CEQA document.

Pages 2-7 and 2-38 of the DEIR discusses phased closure of the landfill and indicate that preliminary closure and post closure plans will be submitted as part of the application for the revision of the SWFP for the proposed project. Landfill closure may pose a potential for significant environmental impacts due to construction, excavation, grading, installation of landfill gas and leachate monitoring and recovery systems, importation and exportation of soil, penetration of buried waste cells, and other considerations.

The closure of a landfill can also cause environmental impacts due to the need to reroute waste to other disposal sites. These impacts can be in the areas of traffic, air quality, effects on site life of other landfills, siting new landfills, and considerations such as transporting waste to other counties or states.

Will a separate CEQA evaluation be considered for these potential impacts related to closure, or are these potential impacts to be assessed as part of this EIR?

Under the existing 1992 SWFP, (Section I, FINDINGS (1.) (A)), the facility is allowed to export up to 250,000 cubic yards of low permeability soil to other VRSD landfills. This SWFP (Section II, CONDITIONS (3.) (b)), also allows up to 75 vehicles per day to be used in the exportation of these soils. Is this activity proposed to continue as part of the

integral LCRS will be able to withstand the overburden pressure, and/or potential seismic events, and still maintain the structural integrity to prevent leachate from overlying waste and adjacent waste penetrating to the unlined section of the existing landfill?

If the compacted soil barrier fails due to overburden pressure or seismic events, how will leachate seepage be prevented from crossing the interface between the flat composite liner and the compacted soil barrier? If this barrier fails at this interface, leachate from the expanded areas of the landfill could penetrate into the unlined area. Are there any plans to install the side slope liner system on the slopes of the existing waste in the areas where the flat liner system adjoins the slopes of the waste already in place?

CIWMB staff suggest consultation with the RWQCB in order to identify potential impacts related to these issues, and to identify any required mitigation measures.

MITIGATION REPORTING OR MONITORING PROGRAM (MRMP)

Sections of the environmental document indicate that mitigation measures may be offered as part of this project to offset potential environmental impacts. This is a determination to be made by the Lead Agency. If mitigation measures are to be offered for this purpose, the operator and the Lead Agency should consider the following information:

As required by Public Resources Code Section 21081.6, the Lead Agency should submit a MRMP at the time of local adoption of the Environmental Impact Report or Mitigated Negative Declaration. This MRMP should identify the environmental impacts associated with the proposed project, identify mitigation measures to reduce impacts to a less than significant level, identify agencies responsible for ensuring the implementation of the proposed mitigations, and specify a monitoring/tracking mechanism. The MRMP is also required to be made a condition of project approval. Recent changes to this Section (AB 314) also requires that "A public Agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures." Board Staff suggest that the final environmental document establish enforcement procedures and penalties, as well as develop conflict resolution provisions.

SUMMARY

CIWMB staff would like to thank the Lead Agency for the opportunity to review and comment on this proposed project.

CIWMB staff hereby make a formal request for copies of, and consultation on, any subsequent environmental documents, copies of public notices, and any Notices of Determination (NODs) for this project.

proposed project? Page 2-26 of the DEIR indicates that maximum of 70 vehicles per day currently travel to the landfill. If this activity is proposed to continue, were these 75 trucks per day for soil exportation included in the traffic study evaluations related to noise, traffic, and air impacts?

Section 3.10 of the DEIR addresses potential noise impacts that could result from the implementation of the proposed project and the cumulative effects from the project and other expected traffic increases on State Highway 126 and on Toland Road.

This evaluation of noise impacts identifies a significant noise impact to the owners or occupants of residences on Toland Road that could result from the proposed project, and recommends construction of a 6 foot high, noise barrier at the two existing residences to mitigate noise impacts. Will this mitigation measure be proposed for other future land uses on Toland Road that might occur as allowed under the General Plan?

This evaluation also indicates that the noise barriers themselves are considered to be a long term visual impact because of their size. The discussion then states that the impacts from the noise barrier would not be significant. How was the determination made that the noise barrier itself would not have a significant impact? What is the proposed length of a barrier needed to attenuate the projected noise levels to a level that is less than significant? A detailed description of the noise barriers should be included in the final EIR, including site maps showing the proposed locations.

An environmental assessment should be made regarding potential impacts to visibility at the properties, including impacts on safe access to and from the properties, from Toland Road. Have the owners and residents of these properties been consulted regarding the installation of the noise barriers? What approvals will be required for the construction of these barriers?

Section 2.5 of the DEIR describes the composite liner system proposed for the lateral expansion areas of the landfill and indicates the type of geotextile liners that will be used on the flat portions of the landfill and on the side slope areas of the expansion.

A low permeability barrier of compacted soil is proposed as an environmental protection measure for the areas of the landfill that have previously received waste.

Has consideration been given to the potential for this compacted soil barrier and the integral LCRS to be deformed or destroyed by the addition of 210 feet of overburden waste to be placed on top of the barrier? Are there any studies or engineering data to indicate that this barrier and the

SCH #95031009; DEIR for Toland Road L.F. expansion
Page 9

If there are any questions regarding these comments, please
contact me at (916) 255-3305.

cc: David Otaubo
Permits Branch
Permitting and Enforcement Division
CIWMB

Tom Kaufman
Ventura County Resource Management Agency
Environmental Health Division (LEA)
Mail Location 1730
800 South Victoria Avenue
Ventura, CA 93009

DOCUMENT 03
CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD
RESPONSE TO COMMENTS

Response 03-1

1. The description of the proposed project included in the CIWMB's letter matches the project as proposed by VRSD and analyzed in the Draft EIR.

Response 03-2

1. VRSD has not made a decision as to whether alternative daily cover may be used at Toland as part of the proposed project. Therefore, while alternative daily cover is mentioned in the Draft EIR, the potential impacts associated with its use are not addressed. Should VRSD make a decision in the future to implement an alternative daily cover demonstration project for the proposed project at Toland, it will consult with the LEA and RWQCB. During the consultation process, it would be determined if a CEQA evaluation is appropriate for the demonstration project or for the use of alternative daily cover at the landfill.

Response 03-3

1. The potential site specific impacts associated with closure and postclosure of Toland are addressed in each topical area in Chapter 3.0 of the Draft EIR. As appropriate, mitigation measures are included in the EIR for the potential site specific impacts associated with closure and postclosure of Toland. The impacts associated with diversion of waste to a new or existing solid waste facility at the time of closure of Toland (in approximately 30 years) would be addressed at that time as part of the specific project being considered to replace Toland. To attempt to address these impacts at this time would be speculative, as alternatives for management of solid waste 30 years in the future are not known. Section 15145 of the CEQA Guidelines indicates that EIRs are not required to address issues that are speculative, therefore, the potential impacts associated with diversion of waste to a new or existing solid waste facility at the time of closure of Toland are not addressed in this EIR.

Response 03-4

1. While the existing Solid Waste Facility Permit for Toland (SWFP No. 56-AA-0005) includes findings and conditions to allow the export of up to 250,000 cubic yards of low permeability

soil to other VRSD landfills (via a maximum of 75 vehicles per day), VRSD has not exported material from Toland. VRSD has made other arrangements to meet the low permeability soil requirements at its other landfills and will not export such material from Toland as part of the proposed project. Therefore, the EIR does not address the impacts associated with the export of soil from Toland. The Report of Disposal Site Information for the proposed project will eliminate the findings and conclusions regarding the export of soil from Toland.

Response 03-5

1. As shown in Figure 3.8.2 of the Draft EIR, with the exception of Toland Park, properties abutting Toland Road are zoned Agricultural Exclusive (A-E). The minimum lot area for development in this zone is 40 acres. Considering this large lot size and existing development, it would be unnecessary and likely undesirable to develop new structures proximate to the Toland Road right-of-way. In addition, site plans for new development would be subject to review and approval by the County Planning Division. It is reasonable that project-related traffic noise which could affect future land uses along this road, including any development of Toland Park, would be mitigated by appropriate site planning and setbacks. Based on the above, it is considered unlikely that future land uses along Toland Road would be affected by project-related traffic noise. Therefore, the construction of noise barriers as mitigation for potential future land uses along Toland Road is not expected to be required.
2. The noise consultant for the proposed project has concluded that noise barriers represent a technically feasible measure to mitigate noise impacts to below a level of significance for the two existing residences on Toland Road (MGA, 1995). As stated in Section 3.10.7 of the Draft EIR, a barrier of approximately 6 feet in height would be required to reduce noise levels to within County standards. The barriers could be a berm, wall, or a combination berm and wall. The barriers must be continuous, have no openings or gaps, and have a minimum density of 3.5 pounds per square foot. The noise barriers may be constructed with 1/4-inch plate glass, 5/8 inch plexiglas, any masonry material, or any combination of these materials. Wood and other materials may be used if specifically designed as a noise barrier and should be at least 2 inches thick.
3. The visual impact of the noise barriers for the two residences was not considered significant based on the significance thresholds as defined in the visual resource section of the Draft EIR (see Section 3.9.3). As noted in the Draft EIR, the noise barriers would be constructed to blend with the rural character of the area, such as a country style wood barrier, and could be

screened with landscaping. Based on the defined visual impact thresholds, the barriers would not result in "a substantial, demonstrable negative aesthetic effect," or "significantly alter or obscure public views."

4. As discussed in Section 3.10.7 of the Draft EIR, a detailed noise analysis would be required to determine the final design of the noise barriers. The specific height and length of the barriers would be determined by the geometry of the existing homes, such as setbacks from the roadway, grade separations, and exterior living area orientation. This level of design detail is typically not included in an EIR. The barriers would be designed to assure safe access to and from the residences from Toland Road.
5. The owners and residents of the properties along Toland Road were not consulted during preparation of the Draft EIR regarding the noise barrier mitigation. The owners/residents shall be involved in the decisions regarding final design and materials for the barriers. If the owners do not desire the installation of noise barriers, alternative mitigation such as retrofitting the residence windows with double plate glass, could be considered. Such measures, however, would not mitigate outdoor living area noise levels.
6. Toland Road is owned and maintained by the County. Installation of a noise barrier within the right-of-way would require review and approval by the County Public Works Agency. Construction of barriers within boundaries of the residential properties would require a building permit from the County Building and Safety Division.

Response 03-6

1. The design and engineering of the intermediate low permeability soil barrier, composite liner systems, leachate collection and removal system (LCRS), landfill gas collection system, and other components of the proposed project will take into account various issues including deformation from overburden, and potential seismic events. Based on similar types of issues at other landfills, it is known that appropriate design criteria and engineering methods are available to assure that the various components of the landfill can withstand the geotechnical forces that may occur at Toland.

2. The interface of the composite liner system, including the LCRS, will be designed to assure that the lateral expansion portion of the proposed project would not release leachate to the existing waste prism. Specifically, leachate from the lateral expansion would be routed away from and around the existing waste prism.
3. Specific design criteria and engineering calculation regarding these issue will be submitted to the responsible agencies (e.g., LEA, RWQCB, CIWMB) at the appropriate time in the permitting and design of the project.

Response 03-7

1. In accordance with Public Resources Code Section 21081.6, a mitigation monitoring program for the proposed project will be considered by the VRSD Board of Directors, as the CEQA lead agency, as part of certification of the EIR and approval of the project. The program identifies specific mitigation measures to be undertaken, when the measure will be completed, and the agencies responsible for oversight and implementation of the measures. The mitigation monitoring program includes each of the mitigation measures in Table 1.1 of this Final EIR. Copies of the adopted mitigation monitoring program will be provided to responsible agencies, including the LEA and CIWMB.

Response 03-8

1. VRSD will continue to consult with the CIWMB staff as the proposed project progresses. The CIWMB is included on the mailing list for this Final EIR (see Chapter 7.0 of the Final EIR) and will be provided the Notice of Determination adopted by the VRSD Board of Directors.

STATE OF CALIFORNIA—ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

101 CENTRE PALA DRIVE
MONTEREY PARK, CA 91754-2156
(714) 266-7500
FAX: (714) 266-7600



Mr. Whitney
Page 2

RECEIVED

November 1, 1995

NOV 2 1995

V. R. S. D.

Mr. Clinton L. Whitney
General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003-5562

DRAFT ENVIRONMENTAL IMPACT REPORT - TOLAND ROAD LANDFILL EXPANSION
PROJECT. SCH# 95031009. (File No. 700.520) (File No. 69-91)

We have reviewed the September 1995 (Received September 21, 1995) Draft Environmental Impact Report (EIR) for the above-referenced project and have the following comments:

- 1) Section 2.3.5.2 on Page 2-21 of the draft EIR describes the control of incoming waste by the implementation of a load-checking program for this proposed project. There is no mention of the use of an organic vapor analyzer nor a gamma radiation detector to aid in the detection of unacceptable waste. Please comment on the use of these devices.
- 2) Section 2.2.4.2 on Page 2-14 of the draft EIR describes the installation of a septic tank and leachfield system for the disposal of domestic wastewater.

The Regional Board does not favor the use of subsurface sewage disposal systems for the long term use for sewage disposal, unless a public sewage collection system is not available. In that event, information must be obtained to show that the sewage disposal system can be installed, operated, and maintained in accordance with all applicable rules and regulations of the County of Ventura Environmental Health Department. In addition, if a sewer system becomes available, the facility should be prepared to connect to the collection system.
- 3) Section 3.3.3.1.2, beginning on Page 3.3-16 of the draft EIR, discusses the use of "non-potable" water from three sources: (1) an onsite well; (2) an offsite well; and (3) hauled water from Rio Plaza Water Company. The nature of the "non-potable" water should be described in this Section. Further, this Section should state that non-potable water applied to the landfill for dust control or irrigation is subject to waste discharge requirements prescribed by this Regional Board.
- 4) Section 3.3.7 on Page 3.3-23 discusses water-saving measures to be implemented during landfill operations. Specifically, one measure stated that "washwater from cleaning vehicles and equipment shall be collected and recycled and reused for washing or dust control". This Section should state that any wastewater applied to the landfill for dust control is subject to waste discharge requirements prescribed by this Regional Board.

2.1-15

We appreciate the opportunity to comment upon this document. Should you have any questions, please contact Blythe Ponak-Bacharowski at (213) 266-7580.

Rodney A. Nelson

RODNEY H. NELSON
Senior Engineering Geologist
Landfills Unit

cc: Elizabeth Haven, State Water Resources Control Board

DOCUMENT 04
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
RESPONSE TO COMMENTS

Response 04-1

1. The discussion of the random load checking procedure in Section 2.3.5.2 of the Draft EIR was general in nature and was not intended to provide complete details of the specific program. VRSD has a detailed load checking program for each of its landfills, including Toland. The load checking program for the operation of Toland under the proposed project would include the specific methods to be used to detect suspected nonpermitted wastes, and would include the use of appropriate equipment. The load checking program for Toland would be included in the operation plan for the proposed project that would be developed and incorporated into the appropriate permit applications.

Response 04-2

1. A public sewage collection system is not available in the vicinity of Toland, therefore, as discussed in the Draft EIR and noted by this comment, the proposed project includes a septic tank/leachfield system to dispose of sanitary wastewater generated by the employees/public at the site. As discussed in Section 3.5.3.1.1 of the Draft EIR, it is estimated that approximately 320 gallons per day (gpd) of sanitary wastewater would be generated by the proposed project. Also as discussed in this section of the Draft EIR, the septic tank/leachfield system would be designed, constructed and maintained in accordance with the applicable rules and regulations of the County Environmental Health Division and the Uniform Building Code.
2. VRSD has prepared a report to determine the suitability of the soils at the site for a septic system (Alpine Geotechnical, 1995). The report found that the site is suitable for development of a septic tank/leachfield system to manage the 320 gpd of sanitary wastewater that would be generated by the proposed project. The report has been submitted to the County Environmental Health Division.
3. VRSD agrees that if a public sewer system becomes available during the life of the proposed project, the facility would be connected to such a system.

Response 04-3

1. The term "nonpotable" water, as used in Section 3.3.3.1.2 of the Draft EIR, indicates the water would be used without any treatment as it comes from the well. The term is not used as an indication that the water is somehow contaminated or unfit for human consumption. As requested by this comment, Section 3.3.3.1.2, paragraph 3 of the Draft EIR is revised to indicate that nonpotable water applied to the landfill for dust control or irrigation would be subject to the WDRs issued for the proposed project by the RWQCB. See Section 3.1 of this Final EIR for the change made to Section 3.3.3.1.2, paragraph 3 of the Draft EIR. This change does not alter the findings or conclusions of the EIR.

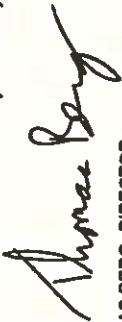
Response 04-4

1. As requested by this comment, the mitigation measure included in Section 3.3.7, paragraph 2 regarding the use of washwater from cleaning vehicles and equipment being collected and reused for washing or dust control is revised to indicate that wastewater applied to the landfill for dust control would be subject to the WDRs issued for the proposed project by the RWQCB. The revision of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

SECTION 2.2
COUNTY AGENCIES
COMMENTS AND RESPONSES

VRSD Board of Directors
November 6, 1995
Page 2

Thank you for this opportunity to comment on the DEIR. These comments are submitted in the spirit of working with VRSD to ensure the EIR ultimately certified by VRSD's Board of Directors is adequate for use by the County in processing the requested permit modifications and other entitlement requests which may be submitted by VRSD. For the administrative record, this transmittal constitutes the County comments regarding the adequacy of the DEIR and includes the September comments submitted by the County during the period of early consultation.



THOMAS BERG, DIRECTOR
RESOURCE MANAGEMENT AGENCY

cc: John Conway - VRSD
Agricultural Commissioner-J. Fulmer
APCD-C. Thomas
EHD/LEA-T. Gilday, D. Siegrist
Fire Department/R. Sims
Flood Control District-D. Taylor
GSA-T. Lubin
Planning Division-K. Turner
PWA-R. Guske
SWMD-C. Madden

attachments

MEMBERS OF THE BOARD
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Chair

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FRANK SCHILLO
JUDY MIKELS
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**BOARD OF SUPERVISORS
COUNTY OF VENTURA**
GOVERNMENT CENTER, HALL OF ADMINISTRATION, L #1880
800 SOUTH VICTORIA AVENUE, VENTURA, CALIFORNIA 93009

November 6, 1995

Andres Herrera, Chairman
Board of Directors
Ventura Regional Sanitation District
1001 Patridge Drive, Suite 150
Ventura, CA 93003-5562

DEIR Toland Landfill Expansion Project - County Review and Comments

This letter transmits the County's comments on the above referenced DEIR and also identifies the inaccuracies and deficiencies County agencies and departments have identified with the document. Specific, detailed, agency and departmental comments on the DEIR are also attached.

It is the County's understanding that VRSD intends to prepare a Final EIR (FEIR) which includes a complete response to comments, as stated by VRSD staff during meetings with County staff. It is very important that this document include a detailed response to comments to ensure that all responsible agencies have the most up-to-date information on which to base their recommendations regarding their respective, proposed permits. Please let me know if this is not the case.

The County, as a responsible agency, has reviewed the DEIR and has identified various areas of concern with the document. These concerns must be adequately addressed (to the County's satisfaction) as the issues must be appropriately conditioned by the County when considering VRSD requests for modifications and/or revisions to existing entitlements as well as requests for new entitlements. Failure for these issues to be adequately addressed in a Revised DEIR and/or FEIR could lead to a document which is inadequate for the County to use as a Responsible Agency in processing VRSD's proposed Toland Landfill CUP 3141 permit modification.

Specific, detailed comments from the following County review agencies and departments are attached. The Agricultural Commissioner, APCD, EHD/LEA, GSA, Planning Division, Public Works Agency and SWMD have identified DEIR deficiencies to be addressed in a Revised DEIR and/or FEIR. The County Fire Department and Flood Control District have indicated that the DEIR is adequate for purposes of their review. In almost all cases the comments from each Agency or Department identify the appropriate way, manner or language your staff and the consultant can use in responding to the comment.

**DOCUMENT 05
VENTURA COUNTY BOARD OF SUPERVISORS
RESPONSE TO COMMENTS**

Response 05-01

1. This letter transmits comments from County agencies on the Draft EIR. The specific comments and responses are included in Documents 06 through 15.



Office Of
AGRICULTURAL COMMISSIONER

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06
Agricultural Commissioner
W. Earl McPhee

Chief Deputy
David S. Buettner

MEMORANDUM

To: Lynn Kada
RMA Planning

From: Jim Fullmer *J*
Deputy Agricultural Commissioner

Subject: TOLAND EXPANSION

Date: October 10, 1995

The Agricultural Commissioner's office upon review of the September Draft E.I.R. does not believe that the litter problem has been adequately addressed; and that the only measure that would eliminate the debris problem to adjacent production agriculture would be that of a chain link fence along the entire length of Toland Road both east and west sides. (1)

Another observation: to eliminate the hazardous condition at the Toland Road/126 intersection would be to eliminate the east bound left hand turn traffic lane, require that all traffic from the western portion of the county be required to continue a half mile further east and use the present underpass as a turn around, approach the Toland/126 intersection in a westerly direction, and then turn right on to Toland Road. This would remove all slow moving trucks from the fast travel lanes, and eliminate a considerable amount of noise air pollution; and would create a much safer condition that is less than what should be considered safe at the present time. Slow trucks in fast lanes are dangerous under any circumstances - this problem could be done with a little good engineering which would solve many problems. (2)

I appreciate our discussions on this matter.

Thanks.

JBM\obj:e:\wp51\docs\toland.trf

DOCUMENT 06
VENTURA COUNTY AGRICULTURAL COMMISSIONER
RESPONSE TO COMMENTS

Response 06-1

1. Section 3.14 of the Draft EIR included a detailed discussion of litter control measures along roadways leading to Toland and at the landfill. Litter control measures along roadways leading to the landfill that would be implemented by agencies other than VRSD include the following:
 - Requirements of the California Vehicle Code that vehicles (including waste hauling vehicles) must not litter and must cover their loads.
 - County ordinance requiring commercial waste hauling vehicles to be inspected annually by the County Environmental Health Division to assure that the vehicle meets the minimum standards included in CCR Title 14 relative to leaking and cleanliness.
 - State and County litter control measures enforced by the California Highway Patrol, County Sheriff's Department, and the County Environmental Health Division.

2. The following litter control measures are included as mitigation measures in the Draft EIR and shall be implemented by VRSD:
 - 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 inspections 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.
 - Dispatching litter control teams at least weekly, or more frequently if required, to collect litter along the access road, Toland Road, and Highway 126 within one-quarter mile of either side of the intersection with Toland Road.
 - Posting signs at the landfill entrance and scalehouse noting anti-littering laws and the requirement for loads to be properly covered.

3. In accordance with CCR Title 14, the following measures shall be implemented at the landfill to control litter:
 - Waste shall be compacted at the working face of the landfill.
 - Periodic application of daily cover or alternative cover during the day and at the end of the working day.
 - During periods of high winds, more frequent application of cover material.
 - Maintain the smallest working face as safely practicable given the type of and number of landfill equipment operating at the working face.
 - 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.
4. In response to this and other comments, the following additional mitigation measures have been included in the EIR to better define the litter control program:
- Litter control crews shall inspect the landfill fences (permanent and portable fences) on a weekly basis and remove litter.
 - During periods of high winds, litter control crews shall be dispatched at least twice a week, or more frequently if required, to inspect the landfill fences (permanent and portable fences) and remove litter.
 - 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.

The inclusion of these additional mitigation measures in this Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for a listing of the mitigation measures for the proposed project. Also see Table A.1 of Appendix A of this Final EIR for a combined listing of the operational procedures and regulatory requirements, and mitigation measures including those noted above for litter control. As discussed in Section 3.14 of the Draft EIR, implementation of the litter control program noted above would assure that the proposed operation at Toland does not result in a significant litter impact at onsite or offsite areas, or along the roadways leading to the landfill.

5. Regarding this comment's suggestion of a chain link fence along the entire length of Toland Road to prevent litter in the adjacent orchards, the combination of measures discussed above will effectively control litter along Toland Road. Wind and air currents caused by passing trucks would push litter over a chain link fence along Toland Road, therefore, the use of litter control teams along the road and in the adjacent orchards will provide better control of litter than the suggested chain link fence.

Response 06-2

1. In response to this comment, VRSD evaluated the use of the existing underpass located approximately one-half mile east of the Toland Road/Highway 126 intersection with Caltrans, the County Transportation Department, and the County Planning Division. The use of this underpass would eliminate the need for waste hauling trucks traveling from the west County to make a left turn from Highway 126 onto Toland Road.

2. As discussed in Section 3.11.7 of the Draft EIR, the Toland Road/Highway 126 intersection is within the jurisdiction of Caltrans. Based on Caltrans' review of the traffic study for the proposed project, it recommended traffic improvements to mitigate potential project impacts (see Comment Letter 02). The improvements recommended by Caltrans include the installation of an intersection control flashing beacon at Toland Road/Highway 126, standard intersection lighting, and appropriate signage along Highway 126. See Table 1.1 of this Final EIR for the traffic mitigation measures.
3. Neither Caltrans or the County Transportation Department identify hazardous conditions at the Toland Road/Highway 126 intersection. In addition, these agencies have concurred with the traffic study's conclusion that signal warrants at this intersection would not be met by the proposed project (see Comment Letters 02 and 13). The flashing beacon and warning signs, as recommended by Caltrans and included in the EIR as mitigation measures, would mitigate potential traffic-related safety issues at the intersection.
4. As noted above, the use of the underpass located approximately one-half mile east of the Toland Road/Highway 126 intersection has been evaluated by VRSD. Based on a review of conditions and discussions with Caltrans, the County Transportation Department, and the County Planning Division, issues associated with the use of the underpass include:
 - Potential conflicts with through traffic on Highway 126 associated with waste truck deceleration and acceleration for exiting and merging on Highway 126.
 - Vertical clearance under Highway 126.
 - Structural condition of pavement to handle heavy loads.
 - Potential conflict with other users (if any) of the underpass.
 - Potential conflict with the intersection of Hall/Sycamore Road and Highway 126 as waste trucks merge onto Highway 126. The intersection of Hall/Sycamore Road is only approximately 175 feet from the underpass.

Based on the evaluation, it has been determined jointly by VRSD, Caltrans, the County Transportation Department, and the County Planning Division that the use of the underpass would not improve traffic conditions in comparison to waste trucks making left turns at the Toland Road/Highway 126 intersection (as mitigated). The traffic mitigation measures included in the EIR and concurred on by Caltrans and the County Transportation Department remain valid and constitute the proposed mitigations for the project.

5. This comment also suggests that use of the underpass may alleviate noise and air pollution impacts which would be associated with trucks turning left from Highway 126 onto Toland Road. As discussed in Section 3.10.2.3 of the Draft EIR, areas within the immediate

vicinity of Highway 126 currently experience noise levels in excess of 70 CNEL (as measured adjacent to the Santa Clara School) due to nonproject-related traffic volumes on Highway 126. Moreover, during noise measurements, trucks making left or right turns on Toland Road were usually not audible over the traffic noise on Highway 126 (MGA, 1995). As discussed in Section 3.10.2.3 of the Draft EIR, noise increases along Highway 126 (including the intersection of Toland Road and Highway 126) due to project-related traffic would be less than 1 dBA as compared to the 3 dBA significance threshold. Therefore, the use of the underpass would not mitigate the nonproject-traffic related noise levels at the Santa Clara School, and it would only marginally reduce the incremental noise increase associated with project-related traffic at the school.

6. As discussed in Sections 3.12 and 3.13 of the Draft EIR, project-related truck use of the Toland Road/Highway 126 intersection would not result in a significant impact on local air quality or result in health risks from the associated air emissions at the intersection. An updated analysis of the project-related carbon monoxide (CO) emissions conducted for this Final EIR confirms the proposed project would not exceed applicable state and federal air quality standards for CO at the intersection of Toland Road and Highway 126. Therefore, while the use of the underpass may incrementally reduce traffic-related air emissions at the intersection of Toland Road and Highway 126, the project-related air emissions at this intersection are not significant and no mitigation is required.

L. Kada\Toland Landfill DEIR
November 2, 1995
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VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Lynne Kada, Planning DATE: November 2, 1995
FROM: Chuck Thomas
SUBJECT: Draft Environmental Impact Report for the Toland Road Landfill Expansion and Landfill Closure/Postclosure Project; Ventura Regional Sanitation District (VRSD)

Air Pollution Control District (APCD) staff has reviewed the air quality section of the subject draft environmental impact report (EIR) for the proposed expansion of Toland Road Landfill. VRSD is proposing a vertical and lateral expansion of the Toland Road Landfill and an increase in the daily permitted tonnage limit. The proposed project would have the capacity for about 30 million cubic yards, or about 1.5 million tons of solid waste, and would be permitted to receive a maximum of 1,500 tons per day of solid waste. The Toland Road Landfill would provide about 31 years of capacity under the proposed project. The draft EIR examines the potential environmental impacts of the proposed expansion and the eventual closure and postclosure operations. The following are the APCD's comments on the air quality section of the draft EIR.

- 1) The carbon monoxide analysis for the project indicates that the project will not create a carbon monoxide hotspot at the intersection of Toland Road and Highway 126. It appears, however, that the analysis assumed that vehicles would only have to wait one second to make turns at the intersection. Although that assumption is probably reasonable for periods of light traffic on Highway 126, it is probably too short during times when the amount of traffic on Highway 126 is greater. It is reasonable to expect that traffic volumes on highway 126 will substantially increase over the next 31 years. Therefore, APCD staff recommends that the analysis be redone using more appropriate wait periods for vehicles waiting to make turns onto Toland Road from Highway 126 and onto Highway 126 from Toland Road.
- 2) Toland Road, from its beginning at Highway 126 up to the landfill, is a steep grade. It is not clear if the offsite vehicle emission estimates and the associated modeling analyses included the extra amount of emissions that will occur due to vehicles going up Toland Road.
- 3) Some of the flare destruction and removal efficiencies (DREs) seem too high. Different DREs were used for different compounds, however, individual DREs were not listed; we had to back calculate them from the emission rates. No source for the

DREs was listed. We sent the EIR consultants data that had been compiled for the Weldon Canyon EIR, but it was apparently not used for this EIR. For example, a 95 percent DRE was used for benzene. Based on the Weldon Canyon Landfill EIR date, the average benzene DRE was 90.4 percent, with a worst case (second lowest) value of 64.2 percent.

4) It is not clear if offsite vehicle emissions were addressed in the modeling analyses, including the health risk assessment. They were included in air quality modeling analyses performed for the Bailard Landfill EIR. The modeling analyses should be revised to include emissions from the project-related offsite vehicles. Moreover, the offsite vehicle emissions should be modeled as a line source.

5) The flare coordinates in the ISC2 model input file are not correct. The coordinates incorrectly located the flare somewhere southwest of "Residence 3."

6) In the text of the health risk assessment (page G.1-9), the flare stack velocity was reported as 3.9 meters per second. A value of 3.8 meters per second was used in the model. It appears that, based on the reported stack diameter, 3.9 meters per second is the correct value to use.

7) No source was cited for the landfill gas composition data that was used in the emission calculations. However, a spot check of the data indicated it is the same data used for the Bailard Landfill EIR.

8) Some dose-response number (cancer unit risk factors and noncancer acceptable exposure levels) were used in the health risk assessment that are not in the CAPCOA Risk Assessment Guidelines. They were for compounds that are not listed in the CAPCOA Guidelines. The source of the data was not given.

9) The carbon monoxide and PM-10 modeling analyses apparently did not factor in background concentrations of these pollutants. The reason given for not doing so is that such background concentrations are not available. However, background carbon monoxide data is available from the APCD's El Rio air monitoring station and background PM-10 data is available from the APCD's Pitu monitoring station. Moreover, Southern Pacific Milling Company has been operating four PM-10 monitors at their proposed Sycamore Ranch mine site since November 1994. The purpose of those monitors is to establish background PM-10 concentrations for the area. The Sycamore Ranch mine site is located just a few miles east of the Toland Road Landfill, much closer to the Toland Road Landfill than the Pitu monitoring station. The PM-10 data from those monitors is available from the APCD.

- 10) The air quality section should contain isopleth plots of the results of the air quality modeling analyses. The Bailard EIR contained such plots.
- 11) The air quality section of the EIR contains a summary table of project-related off-site mobile emissions. However, it does not contain a similar table for on-site emissions. Such a table should be included. The table should include emissions from all on-site mobile equipment, landfill fugitive gas, flare emissions, and any miscellaneous emission sources such as fuel dispensing facilities. It would also be helpful if the air quality section contained a third table summarizing all project-related emissions, both on-site and off-site. The Bailard Landfill EIR contained such tables.

12) Table 1.1 (Summary of Impacts and Mitigation Measures) states that on-site emissions associated with the proposed project reflect a shift in air emissions associated with landfilling at Bailard to Toland. This is only partly true. When Bailard closes, there will no longer be any landfilling operations taking place. However, there will be closure and postclosure activities that will generate air emissions. Furthermore, Bailard will still generate fugitive landfill gases and the flare will still operate.

13) Table 1.1 should acknowledge that total project-related NOx and ROC emissions will significantly impact regional air quality.

14) The workplan developed for the air quality section called for two landfill gas collection system efficiencies be used in the air quality analyses. It appears that an 85 percent collection efficiency was used instead. APCD staff concurs that the efficiency of the gas collection system will increase over time and may eventually reach 85 percent or even 95 percent. However, in the earlier years, the efficiency of the gas collection will likely be closer to 75 percent. We therefore recommend that the air quality analyses be redone using a 75 percent gas collection system efficiency factor.

15) The workplan for the air quality section also called for an evaluation of potential fugitive dust impacts on nearby agricultural operations and associated programs. This still needs to be done. Fugitive dust can reduce the quantity and quality of agricultural crops. Fugitive dust can also be detrimental to biological control programs such as those conducted in the vicinity of the Toland Road Landfill.

16) The air quality mitigation measures in the Bailard EIR were far more comprehensive and specific than those in the Toland Road EIR. Most, if not all, of the Bailard Landfill air quality mitigation measures are also appropriate and feasible for the Toland Road Landfill and should be included in the Toland Road

EIR. Additionally, to help mitigate fugitive dust, YRSD should consider paving, or paying the cost of paving, unpaved farming and ranch roads in the Santa Clara Valley.

If you have any questions, please call me at (805) 645-1427.

DOCUMENT 07
VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
RESPONSE TO COMMENTS

In preparing responses to the comments on the Draft EIR provided by the APCD, various tables within the air quality appendix (i.e., Appendix G) of the Draft EIR were revised. While the majority of the data in Appendix G of the Draft EIR has not been revised, most of the tables in the appendix had at least minor revisions, therefore, it was deemed appropriate for the air quality appendix to be provided in its entirety in this Final EIR. Based on the organization of this Final EIR, the air quality appendix is Appendix B.

Response 07-1

1. The carbon monoxide (CO) "hotspot" analysis has been revised to include the estimated maximum waiting time for vehicles making the left-turn from Highway 126 onto Toland Road, as well as the estimated maximum waiting times for the other turning movements at this intersection. Under existing conditions, plus the proposed project, an average delay of approximately 7 seconds for left turn movements from Highway 126 onto Toland Road is estimated (WPA, 1995). This does not represent a significant increase over the approximately 6-second delay currently experienced by vehicles at this intersection. Under cumulative buildout conditions in 2015 (the last year for which Caltrans provides traffic volume projections), which include all sources of traffic, average delays of 19 seconds are estimated for the left turns from Highway 126 onto Toland Road (WPA, 1995).
2. Using the CALINE 4 model, the maximum CO concentrations were determined for the proposed project under the buildout condition. As shown in Revised Table 3.12.12 (see Section 3.2 of this Final EIR), the maximum CO concentrations associated with the proposed project would be 0.8 and 0.6 parts per million by volume (ppmv) for the 1-hour and 8-hour averaging times, respectively. When added to the background CO concentrations of 5.1 and 2.6 ppmv for the 1-hour and 8-hour average, respectively, the proposed project would not exceed the ambient air quality standard for CO (see Revised Table 3.12.12). Therefore, the revision of the CO "hotspot" analysis does not alter the findings or conclusions of the EIR.
3. Please note that during the reanalysis of the CO "hotspot," it was determined that the results included in Table 3.12.12 of the Draft EIR were incorrectly based on heavy-duty diesel trucks accounting for 59 percent of the through traffic volume on Highway 126. Based on data from

Caltrans for 2015 (considered by Caltrans to represent buildout), heavy-duty diesel trucks are projected to account for only 8.5 percent of the through traffic volume on Highway 126. Using the correct heavy-duty diesel truck percentage for through traffic results in the substantial reduction in the maximum CO concentration shown in Revised Table 3.12.12.

Response 07-2

1. Vehicle emissions estimates in Section 3.12 of the Draft EIR are based on the most recent version (EMFAC7F1.1) of the California Air Resources Board's (CARB's) emission factor computer model, which takes into account standardized test cycles and non-standard conditions. Inputs used in the model include type of vehicle, fuel, speed, control technology (e.g., catalytic), ambient temperature, and year (up to 2020 is available). These emission factors, the most detailed available, were selected for purposes of the Draft EIR for heavy-duty diesel trucks traveling at 25 mph on Toland Road.
2. CARB confirms that specific emission factors have not been developed to simulate trucks ascending grades (CARB, 1995), therefore, increased emissions associated with trucks ascending Toland Road are considered to be included in the standard emission factors from CARB. The potential significance of these emissions and resulting ambient concentrations is interpreted by reference to state and federal ambient air quality standard. These standards were developed to protect human health with an adequate margin of safety, and are concentrations averaged over time periods that vary from one hour to one year. These averaging times remove much of the detailed variability that exists in emission sources, especially in mobile sources with engine loading that varies continuously based on factors such as accelerator position and road grade.

Response 07-3

1. A revised table (Table B.3.4 in Appendix B of this Final EIR) is provided listing the constituent concentrations for fugitive landfill gas, flare exhaust and vehicle exhaust and the specific sources of the data. As referenced in the table, the concentrations of the constituents for the landfill gas flare exhaust are from source test data for the internal combustion engines (ICE) operated by Pacific Energy for the conversion of landfill gas to electricity at the Coastal Landfill (Petro Chem Environmental, Inc., 1990a; 1990b; 1991). Source test results for Pacific Energy ICEs were used to be consistent with the same data used in the Bailard EIR.

Further, emission factors for ICEs are conservatively higher than those for flares according to a study by SCAQMD (Pease et al., 1989).

2. None of the flare exhaust constituent concentrations were calculated using an assumed destruction and removal efficiency (DRE), rather they are based on the source test measured gas destruction rates. Using source test data is consistent with the June 19, 1995, revised final workplan for the air analyses to support the Draft EIR developed in consultation with the APCD. For example, the benzene DRE of 96.4 percent measured at Pacific Energy is conservatively low compared to the DRE for benzene at the four landfills in the South Coast Air Basin shown in Table 2.2.
3. The inclusion of Table B.3.4 in the Final EIR does not alter the findings or conclusions of the EIR.

Response 07-4

1. For purposes of the Draft EIR, offsite vehicle emissions were included in the dispersion modeling and health risk assessment by grouping them with the area sources at the working face of the landfill. To respond to this comment, these emissions were remodeled to more representatively simulate their location along Toland Road as a line source. Along with correcting the location of the flare station (see Response 07-5 below), the resulting ambient air constituent concentrations and health risks are included in Revised Tables 3.12.10 and 3.13.2 (see Section 3.2 of the Final EIR). As shown in the revised tables, maximum ambient concentrations and health risks continue not to exceed state or federal ambient air quality standards at or beyond the project boundary, and the health risks remain below the significance thresholds. Therefore, the revision of the dispersion modeling and health risk assessment does not alter the findings and conclusions of the EIR.

Response 07-5

1. The coordinates of the flare stations were revised to depict the correct location of the flare and were included in the revised dispersion modeling and health risk. The resulting ambient air constituent concentrations and health risks are included in Revised Tables 3.12.10 and 3.13.2 (see Section 3.2 of the Final EIR). As shown in the revised tables, maximum ambient concentrations and health risks continue not to exceed state or federal ambient

TABLE 2.2
FLARE THERMAL DESTRUCTION EFFICIENCY⁽¹⁾

NONMETHANE ORGANIC COMPOUNDS	SOUTH COAST AIR BASIN LANDFILL (%)						SYNONYMS
	BKK	Scholl Canyon	Spadra	El Sobrante ⁽²⁾	Arithmetic Mean		
Benzene	99.66	99.3	98.47	99.51	99.14	--	
Carbon Tetrachloride	99.97	99.9	99.2	ND ⁽³⁾	99.69	Tetrachloromethane	
Tetrachloroethene	99.84	99.9	99.31	99.91	99.68	Perchloroethylene, PCE	
Toluene	99.47	99.9	99.54	99.95	99.64	--	
Trichloroethylene	99.87	99.9	99.75	99.97	99.84	Trichloroethene, TCE	
Vinyl Chloride	99.98	99.9	99.35	99.26	99.74	--	
Arithmetic Mean Destruction Efficiency	99.80	99.80	99.27	99.72	99.62	--	

95-105 (12/22/95/rmm)

(1) Pease (1989).
 (2) Horizon Air Measurement Services, Inc. (1995).
 -- = Not detected.

air quality standards at or beyond the project boundary, and the health risks remain below the significance thresholds. Therefore, the revision of the dispersion modeling and health risk assessment does not alter the findings and conclusions of the EIR.

Response 07-6

1. Although the Draft EIR referenced stack velocities of 3.8 and 3.9 meters per second in different parts of the text and Appendix G, a more appropriate stack velocity of 3.5 meters per second was used in the revised dispersion modeling and health risk (see Table B.1.5 of Appendix B of this Final EIR). The resulting ambient air constituent concentrations and health risks are included in Revised Tables 3.12.10 and 3.13.2 (see Section 3.2 of the Final EIR). As shown in the revised tables, maximum ambient concentrations and health risks do not exceed state or federal ambient air quality standards at or beyond the project boundary, and the health risks remain below the significance thresholds. Therefore, the revision of the dispersion modeling and health risk assessment does not alter the findings and conclusions of the EIR.

Response 07-7

1. The comment correctly notes the source for the landfill gas composition data as the Bailard EIR. As discussed in Response 07-3 above, Revised Table B.3.4 in Appendix B of this Final EIR also includes the references for the landfill gas composition data used in the health risk assessment. The revision of Table B.3.4 in the Final EIR does not alter the findings or conclusions of the EIR.

Response 07-8

1. As discussed in Response 07-3 above, Revised Table B.3.4 in Appendix B of this Final EIR also includes the references for the dose-response values used in the health risk assessment. As noted in the revised table, the primary reference for the dose-response values in CAPCOA AB 2588, 1993, supplemented by ACGIH, ASHA TLV and IRIS data. The revision of Table B.3.4 in the Final EIR does not alter the findings or conclusions of the EIR.

Response 07-9

1. As suggested by APCD, the background concentration for CO from APCD's El Rio monitoring station and the background PM₁₀ concentration from the S.P. Milling Company's

project at Sycamore Ranch have been incorporated into the air quality analyses for the proposed project at Toland (see Revised Table 3.12.10 in Section 3.2 of this Final EIR).

2. The PM₁₀ background concentration data from the Piru monitoring station, which was the APCD monitoring station nearest to the proposed project, was used for purposes of the Draft EIR as recommended by APCD during development of the air quality workplan for the proposed project. Subsequent to preparation of the Draft EIR, APCD indicated that PM₁₀ monitoring data was available from the SP Milling project at Sycamore Ranch, located approximately 1.7 miles southeast of Toland Road Landfill. The PM₁₀ monitoring stations at Sycamore Ranch are located at an elevation of approximately 500 feet, which is approximately 500 feet lower than the southwest corner of the landfill footprint. The lateral and vertical proximity (1.7 miles and 500 feet, respectively) of these monitoring stations to the landfill assure reasonable representativeness for the PM₁₀ monitoring data.
3. An evaluation of the Sycamore Ranch data provided by APCD indicates that the arithmetic mean PM₁₀ concentration during the period of October 1994 through August 1995 was 15.1 µg/m³, which is 52 percent of the 1994 annual arithmetic mean of 29.1 µg/m³ at Piru. The proximity of the Piru monitoring station to the dry bed of the Santa Clara River may partly explain why the PM₁₀ concentration measured at the Piru station in 1994 (29.1 µg/m³) is almost twice that measured at Sycamore Ranch. The PM₁₀ data from Sycamore Ranch has been included in Table 3.12.5 (see Revised Table 3.12.5 in Section 3.2 of this Final EIR). The inclusion of the Sycamore Ranch PM₁₀ data in this Final EIR does not alter the findings or conclusions of the EIR as the project-related PM₁₀ concentrations still do not exceed state or federal ambient air quality standards at or beyond the project boundary.

Response 07-10

1. As discussed in Section 3.12.3.2.1 of the Draft EIR, onsite ambient concentrations of criteria pollutants computed for onsite sources associated with the proposed project are below state and federal ambient air quality standards at and beyond the project boundary. Therefore, onsite sources associated with the proposed project would not exceed the significance criteria for air quality impacts as defined in Section 3.13.3 of the Draft EIR. These results were presented in Table 3.12.10 of the Draft EIR and not as isopleth plots. Such plots could have been misinterpreted to indicate significance for the plotted concentrations where no significance exists. In addition, isopleth plots could also have suggested that one direction from the landfill was "worse" than some other direction, when in fact no direction would receive significant concentrations from the onsite sources of the proposed project.

2. A review of the Bailard EIR determined that isopleth plots were provided only for the annual average PM₁₀ concentration associated with that project's activities. These plots were provided in the Bailard EIR because that analysis computed PM₁₀ concentrations would contribute to the exceedance of ambient air quality standards. The proposed project at Toland, however, does not exceed state or federal standards at or beyond the project boundary; therefore, it was determined that providing isopleth plots for criteria pollutants was not warranted.

Response 07-11

1. Table 3.12.11 of the Draft EIR provided offsite mobile emission rates associated with the proposed project. Based on this comment, the emission rates from the proposed project's onsite mobile, stationary and fugitive sources have been included on this table. See Section 3.2 of this Final EIR for the Revised Table 3.12.11. The revision of this table in this Final EIR clarifies the information included in the Draft EIR, but does not alter the findings or conclusions of the EIR as the onsite emission rates were considered in the analysis of air quality impacts.

Response 07-12

1. Table 1.1 of the Draft EIR has been revised to indicate that the proposed project would shift most of the emissions from Bailard to Toland. See Table 1.1 of this Final EIR for the revised text. This revision, however, does not alter the findings or conclusions of the EIR based on the following:
 - Fugitive landfill gas and the emissions from combustion of the gas (i.e., either the Pacific Energy facility or from the backup flare system) would still be emitted at Bailard; however, these emissions would decrease exponentially at Bailard at the same time the emissions at Toland would increase asymptotically to a steady-state constant rate.
 - After landfill operations cease at Bailard, final phased closure activities would utilize heavy-duty equipment for approximately six months. Thereafter, postclosure activities at Bailard would consist of a low level of maintenance and infrequent repairs to landfill facilities. Although the landfill gas would continue to be routed to the Pacific Energy facility or the backup flare for combustion and would continue to emit at an exponentially decreasing rate, emission of fugitive landfill gas would decrease after installation of the final phase of the low permeability landfill cover during the closure period.

Response 07-13

1. Table 1.1 of the Draft EIR has been revised to note that the proposed project would have a significant impact on regional air quality not only because it would exceed APCD's threshold by emitting 25 pounds per day or more of NO_x, as noted in the Draft EIR, but the proposed project would also emit more than 25 pounds per day of ROG which would also exceed APCD's threshold. See Table 1.1 of this Final EIR for the revised text. This revision clarifies the information included in the EIR, but does not alter the findings or conclusions of the EIR as the impact to air quality had already been determined to be significant.

Response 07-14

1. The June 19, 1995 revised final workplan for the air analyses to support the Draft EIR, developed in consultation with the APCD, discussed that landfill gas collection efficiency improves over time as waste becomes more fully encapsulated with composite liners on the bottom, sideslopes, and top of the waste prism. The range of collection efficiencies was described as 75 to 95 percent, representing approximate initial and final values, respectively.
2. To assure the air quality impact analysis was conservative for the purpose of the Draft EIR, the proposed project's emission inventory was calculated for the last day of waste disposal. It was assumed at this point in the life of the landfill that gas collection efficiency would be at least 85 percent because the majority of the landfill would have its final cover already installed under the proposed phased closure. These conditions were considered appropriate to represent the most conservative air emissions for the proposed project and hence, the highest ambient concentrations and impacts. To confirm this maximum condition, a landfill gas collection efficiency of 75 percent was analyzed for the initial phase of the proposed project, using December 31, 1999 as the date for calculation purposes. As can be seen below, the emissions assuming a 75 percent landfill gas collection efficiency rate during the initial phase of the proposed project are lower than the emissions assuming a 85 percent collection efficiency rate immediately before final closure of the proposed project as analyzed in Section 3.12 of the Draft EIR.

EMISSIONS COMPARISON

CASE	DATE	LANDFILL GAS		FLARE AND FUGITIVE LFG EMISSION RATES (lb/day)				
		Collection Efficiency (%)	Flow Rate (scfm/ 10 ⁶ scf/day)	NO _x	ROG	PM ₁₀	SO _x	CO
DEIR	July 27, 2027	85	1,829/2.63	112.0	127.6 (=125 fugitive + 2.6 flare)	13.4	0.67	26.3
Early	December 31, 1999	75	416/0.60	22.5	47.5 (=47 fugitive + 0.5 flare)	2.7	0.13	5.4

3. Based on the above comparison, the air quality analysis included in Section 3.12 of the Draft EIR is conservative as it relates to the collection efficiency of landfill gas.

Response 07-15

1. During the preparation of the Draft EIR, it was decided to include the analysis of the potential fugitive dust impacts on nearby agricultural operations and the associated integrated pest management program used in the citrus and avocado orchards in the vicinity of Toland in the land use section of the Draft EIR (see Section 3.8.3.2.2 of the Draft EIR). As discussed in this section of the Draft EIR, fugitive PM₁₀ concentrations from the proposed project would not adversely impact nearby agricultural operations. Based on APCD's and other comments on the Draft EIR, a mitigation measure has been included in EIR that shall require VRSD to pave, or pay the cost to pave, unpaved roads in the vicinity of Toland. See Response 07-16 below.

Response 07-16

1. Based on a review of the air quality mitigation measures included in the Bailard EIR, it has been determined that similar measures were included in Section 3.12.7 of the Draft EIR for Toland to mitigate potential air quality impacts. This review did not identify appropriate measures in the Bailard EIR that should be included in the Toland EIR.
2. Based on this comment and other comments, a mitigation measure has been included in the EIR that shall require VRSD to pave, or pay the cost to pave, unpaved roads in the vicinity of Toland to mitigate PM₁₀ generated by the proposed project. The linear feet of unpaved road to be paved shall be developed in consultation with the APCD and shall be sufficient to offset the PM₁₀ from project sources (i.e., offsite mobile emissions and onsite emissions). Based on a

preliminary analysis, paving approximately 27,500 linear feet (approximately 5.2 miles) of unpaved roads in the vicinity of Toland would offset the PM₁₀ generated under the "worse case" traffic scenario (i.e., 450 vehicles per day versus the "proposed case" of 210 vehicles per day). The actual linear feet of unpaved road required to be paved to offset the PM₁₀ generated by the proposed project would be based on the number of vehicles traveling to the site on a daily basis. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Environmental Health Division
 Donald W. Koepf
 Director

LOCAL ENFORCEMENT AGENCY COMMENTS ON DRAFT EIR FOR TOLAND ROAD
 LANDFILL EXPANSION AND LANDFILL CLOSURE POSTCLOSURE (SWFP #56-AA-
 0005)

October 31, 1995

October 31, 1995

Attn: General Manager
 Ventura Regional Sanitation District
 1001 Partridge Drive, Suite 150
 Ventura, CA 93003-5562

LOCAL ENFORCEMENT AGENCY COMMENTS ON DRAFT EIR FOR TOLAND ROAD
 LANDFILL EXPANSION AND LANDFILL CLOSURE POSTCLOSURE (SWFP #56-AA-
 0005)

The Local Enforcement Agency (LEA) has reviewed the subject Draft
 EIR (DEIR) and submits the following comments. Comments are listed
 by DEIR page number followed by the DEIR section number.

GENERAL:

1. The DEIR contains a number measures and regulatory controls built into the project description and discussion of impacts throughout the document which potentially avoid significant environmental effects of the proposed project. These measures and controls are distinct from mitigation measures, but still must be fully implemented as part of the proposed project. In order to aid the tracking of these measures, the LEA recommends that the EIR contain a summary table of "measures incorporated into project design and regulation" in order to allow regulatory agencies to better track project implementation.

DETAILED COMMENTS BY DEIR PAGE AND SECTION NUMBER

2. The second to last sentence refers to the maximum volume (of waste) as 1,500 tpd.. The term volume in this sentence should be changed to the term tonnage, which is the correct unit of measurement. It is critical that the EIR not confuse volume and tonnage units. The SWFP issued by the LEA will specify maximum volumes of solid waste and maximum tonnages of solid waste allowed for the proposed project. The SWFP volumes and tonnages cannot exceed the volumes and tonnages specified in the EIR certified for the project.

TOC/pl>CILDAX/TOLAIR2

Page 1

Page 1-27, 1.5.2.3.3.2. California Code of Regulations, Title 14, Division 7 actually establishes State Minimum Standards for solid waste handling and disposal, not general standards. The DEIR should be revised to reflect this fact. 3

Page 2-27, 2.5.1.1. The discussion of liner systems indicates that intermediate barrier soil layers will be used to underlay existing (pre-project) landfill refuse units, while synthetic liners will underlie the horizontal expansion (largely sideslope) portions of the landfill. However, the DEIR does not clearly specify whether possible leachate draining off the new synthetic (sideslope) liners would be diverted around the existing fill area (and intermediate barrier soil layer to be placed over it). 4

2-36, 2.5.5.3. The DEIR should identify the time at which the landfill gas collection system will be installed into old refuse, and the time at which the thermal destruction system will commence operation should the proposed project be implemented. 5

2-36, 2.5.6 The discussion of Nuisance Monitoring and Controls described in this section should include, or at least reference, the full range of project design and mitigation measures addressed elsewhere in the DEIR. For example, the discussion of dust control should include the proposed use of chemical suppressants, access restrictions, etc. 6

2-37, 2.5.6.5. The discussion of odor impacts should be made consistent with the remainder of the DEIR by making reference to project design and mitigation measures addressed in later sections.

2-37, 2.6.1.2. The discussion of preliminary closure and postclosure maintenance plans must be corrected. Preliminary plans must be submitted to and approved by the LEA and Regional Water Quality Control Board, and the California Integrated Waste Management Board (CIWMB). 7

2-38, 2.6.1.3. This section should be revised to reflect the fact that preliminary closure and postclosure maintenance plans are required for the revised SWFP.

3.2-30, 3.2.3.1.1. The DEIR should clearly specify the seismic event for which the landfill, associated control systems, and associated landfill structures will be designed. Is the design criteria the referenced 1.0g peak horizontal acceleration, or some other standard? 8

TOC/pl>CILDAX/TOLAIR2

Page 2

LOCAL ENFORCEMENT AGENCY COMMENTS ON DRAFT EIR FOR TOLAND ROAD LANDFILL EXPANSION AND LANDFILL CLOSURE POSTCLOSURE (SWPP #56-AA-0005)

October 31, 1995

3.2-20, 3.2.2.6.1. The discussion of nonseismic hazards should address potential rock fall/boulder fall hazard to site workers and the public (from surrounding canyon sideslopes). Mitigation measures should be proposed. See following comment.

9

3.2-27, 3.2.3.1. The discussion of impacts should address rockfall hazards associated with a seismic event. The DEIR reference to correct factor of safety for facility slopes does not adequately address this issue.

10

3.2-31, 3.2.3.1.1.7. The DEIR should state that the landfill gas flare/s will be designed to withstand the required design seismic event.

11

3.3-11, 3.3.2.2.4. The DEIR should contain an accurate map of the water seeps referenced in the text. It is not possible to determine the seep locations based upon the information provided. The seeps could potentially impact slope stability and leachate generation within the landfill and are an issue of concern to the LEA.

12

3.3-14, 3.3.3.1.1. The discussion of groundwater protection should address side slope liners and methods to intercept drainage from those liners. See previous comment.

13

3.3-22, 3.3.3.5.1. This section of the DEIR should be clarified. The first bullet implies that composite liners will be installed beneath the entire landfill, while elsewhere the DEIR proposes an intermediate clay barrier layer for existing fill area.

14

3.3-22, 3.3.3.5.2. Impacts of the proposed detention basin at the south end of the landfill should be addressed in the DEIR. Measures such as mosquito control, and any other impacts should be addressed.

15

3.3-22, 3.3.7. The discussion of mitigation measures in this section should address additional dust control measures which do not require the use of water.

16

3.4-9, 3.4.2.1.6.4.5. The DEIR should address methods to prevent water infiltration into the landfill from the seeps referred to in this section.

LOCAL ENFORCEMENT AGENCY COMMENTS ON DRAFT EIR FOR TOLAND ROAD LANDFILL EXPANSION AND LANDFILL CLOSURE POSTCLOSURE (SWPP #56-AA-0005)

October 31, 1995

3.5-13, 3.5.3.1.1.1. The discussion of utilities (as well as the discussion of hours of operation in the DEIR) indicates that nighttime operations are part of the proposed project. Site lighting requirements, including site access road and scalehouse lighting should be addressed in the DEIR.

17

3.8-10, 3.8.1.5.2.. The discussion of CIRMB/COSWMP findings in the DEIR should include the fact that the DEIR referenced LEA COSWMP finding is based upon information provided to the LEA by the County of Ventura Solid Waste Management Department. That Department is the solid waste planning agency for the County of Ventura and all ten Cities within the County.

18

3.8-19, 3.8.3.1.4. See previous comment.

19

3.9-6, 3.9.3.1.3. The discussion of nighttime lighting impacts should evaluate the impacts of refuse hauling and landfill vehicle headlights, including impacts to areas along Toland Road (and adjacent areas).

20

3.11-24, 3.11.3.1.3. The DEIR should address, and if necessary provide mitigation measures for, any traffic safety impacts within the SWPP boundary. The interior of the landfill is relatively steep and confined. Areas which should be noted include, on-site road design, vehicle speed limits, use of appropriate signage etc.

21

3.14-11, 3.14.3.1.2. The discussion of odors should include additional mitigation measures to further ensure that the project cannot become the source of odor nuisances. Possible measures include the more frequent use of cover during the working day, use of odor masking agents, rejection of highly odorous loads, special handling provisions for odorous loads, and periodic odor monitoring at the facility boundary. A tiered odor control and response program which ensures that odor impacts do not become a problem should also be implemented.

22

3.14-14, 3.14.3.1.3., and 3.14-16, 3.14.5. The inspection frequency and area inspected for litter should be better described in the DEIR. For example, there is no discussion of the frequency of litter pick-ups for litter which blows off-site from the active face. The DEIR only addresses litter which blows onto site access roads. Please note that litter blowing from the active face will become more of a problem as the landfill reaches higher elevations. A tiered litter response program which increases the number of litter inspections and clean-ups during periods of high winds and/or when litter is seen blowing off-site (OK off refuse vehicles) should be developed and implemented.

LOCAL ENFORCEMENT AGENCY COMMENTS ON DRAFT EIR FOR TOLAND ROAD
LANDFILL EXPANSION AND LANDFILL CLOSURE POSTCLOSURE (SWPP #56-AA-
0005)

October 31, 1995

3.15-8, 3.15.3.1.1.9. The DEIR should better address mitigation
measures to avoid subsurface landfill fires, and to put out such
fires when they occur. (23)

3.15-8, 3.15.3.1.2. As noted above, the LEA recommends full
security perimeter fencing. The LEA also recommends that all
refuse vehicles entering the facility be inspected at the
scalehouse. (24)

3.15-8, 3.15.3.1.2.2. Additional information should be provided
regarding the random loadcheck program. (25)

This concludes comments from the Local Enforcement Agency regarding
the Draft EIR for the Toland Road Expansion project. Please
contact William C. Stratton at (805) 654-2434 or myself at (805)
654-2815 Monday through Thursday, if you have any questions
concerning these comments.

Terrence Gilday

TERRENCE O. GILDAY, MANAGER
SOLID WASTE SECTION
ENVIRONMENTAL HEALTH DIVISION

DOCUMENT 08
VENTURA COUNTY ENVIRONMENTAL HEALTH DIVISION
RESPONSE TO COMMENTS

Response 08-1

1. The information requested by this comment is provided in Table A.1 of Appendix A of this Final EIR. This table includes a combined list of the operational procedures and regulatory requirements, and mitigation measures included in the EIR.

Response 08-2

1. It is agreed that rather than "... maximum volume of 1,500 tpd" this sentence should read "... a maximum of 1,500 tpd." See Section 1.0 of this Final EIR for the revised text. This correction does not alter the findings or conclusions of the EIR.

Response 08-3

1. It is agreed that rather than indicating CCR Title 14, Division 7 establishes "... general standards..." this sentence should read "... minimum standards..." This correction does not alter the findings or conclusions of the EIR.

Response 08-4

1. As discussed in Section 2.5.1 of the Draft EIR, for phases of the proposed project in which waste would be placed on areas that had previously received waste, a 1-foot thick low permeability intermediate soil barrier would be installed. The intermediate soil barrier would overlay the "pre-project" waste rather than "...underlay existing (preproject) landfill refuse units..." as stated in this comment.
2. Regarding the leachate collection and removal system (LCRS) for sideslope liners, as discussed in Section 2.5.2 of the Draft EIR, the sideslope LCRS would drain to a trench containing a perforated pipe that would flow to a leachate collection sump. In response to this comment, Section 2.5.2, paragraph 2 is revised to indicate that the LCRS for the slideslope liners (i.e., synthetic layer, trench and perforated pipe) would be designed to divert leachate that may be collected around the existing fill areas and around the intermediate soil barrier layer placed over previously received waste.

3. See Section 3.1 of this Final EIR for the change made to Section 2.5.2, paragraph 2 of the Draft EIR. This change clarifies information provided in the EIR, but does not alter the findings or conclusions of the EIR.

Response 08-5

1. In accordance with APCD Rule 74.17, a landfill gas collection system would be installed at Toland no later than when the cumulative decomposable portion of waste at the landfill reaches 500,000 tons. At the current disposal rate (i.e., 135 tpd), VRSD projects that the 500,000 tons of decomposable waste limit at Toland would be reached in approximately 1998.
2. As discussed in Section 2.2.2 and shown in Figures 2.6 and 2.7 of the Draft EIR, the initial phase (i.e., Phase I) of the proposed project would involve placement of "new" waste on top of waste previously landfilled. As discussed in Section 2.5.1 of the Draft EIR, prior to the placement of "new" waste on top of previously landfilled waste, an intermediate soil barrier would be installed, which includes a landfill gas collection system beneath the intermediate soil barrier to remove gas from the waste already in place. In response to this comment, Section 2.5.5, paragraph 3 of the Draft EIR is revised to indicate that under the proposed project, a landfill gas collection system would be installed into the "old" waste during the initial phase of the proposed project.
3. Regarding the timing for the thermal destruction (i.e., flare system) of collected landfill gas at Toland, Section 2.5.5, paragraph 4 of the Draft EIR is revised to indicate that a landfill gas flare system would be installed during the initial phase of the proposed project, pending the necessary design and permitting time period required for such a system.
4. See Section 3.1 of this Final EIR for the changes made to Section 2.5.5, paragraphs 3 and 4 of the Draft EIR. These changes clarify information included in the EIR, but does not alter the findings or conclusions of the EIR.

Response 08-6

1. This comment raises an issue regarding organization of the Draft EIR, but does not raise a technical issue regarding the findings or conclusions of the Draft EIR. Chapter 2.0 (Project Description) of the Draft EIR provides a general overview of the various nuisance control measures included as part of the project. The detailed discussion of specific measures

for the control of nuisances is included in Section 3.14 (Nuisances) of the Draft EIR along with the discussion of the potential impacts associated with the project. Table A.1 of Appendix A of the Final EIR provides the specific operational procedures and regulatory requirements, and mitigation measures included in the EIR to control potential nuisance issues including odor impacts.

Response 08-7

1. Section 2.6.1, paragraph 2 of the Draft EIR is revised to indicate that the preliminary closure and postclosure plans for new or expanded landfills must be submitted to and approved by the LEA, RWQCB, and CIWMB as part of the application for the revised Solid Waste Facilities Permit (SWFP). See Section 3.1 of this Final EIR for the change made to Section 2.6.1, paragraph 2 of the Draft EIR. This change does not alter the findings or conclusions of the EIR.

Response 08-8

1. Section 3.2.3.1.1, paragraph 7 is clarified to indicate that a peak horizontal ground acceleration of 1.0g shall be used for purposes of the seismic design criteria for the landfill, its associated control systems (e.g., liners, LCRS, landfill gas collection system and flare system, surface drainage and erosion control systems), and building and structures at the site. See Section 3.1 of this Final EIR for the clarification made to Section 3.2.3.1.1, paragraph 7 of the Draft EIR. This clarification does not alter the findings or conclusions of the EIR.

Response 08-9

1. Figure 2.5 of the Draft EIR (conceptual preliminary excavation plan) depicts 25-foot wide benches every 50 vertical feet. These benches provide safety to site workers and the public from potential falling rocks and boulders, including falling rocks or boulders caused by a seismic event. The use of benches on excavated cut slopes for this purpose is identical to the use of benches in rock quarries and open pit mines.
2. A mitigation measure has been included in the EIR specifying that sideslope excavations shall include 25-foot wide benches every 50 vertical feet to provide safety to site workers and the

public from potential falling rocks and boulders. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 08-10

1. See Response 08-8 above.

Response 08-11

1. In response to this comment, the locations of the seeps have been placed on a topographic map to clarify their location (see Figure C.1 in Appendix C of this Final EIR).

Response 08-12

1. There are various engineering and design methods available to manage surface water seeps that may be intercepted by the sideslope liner at Toland. The method used will be determined during detailed design of the landfill in consultation with the RWQCB.
2. One method would be to install a synthetic drainage layer behind the flexible membrane liner (FML) to collect water from the surface seeps. The synthetic drainage layer would flow to a trench containing a perforated pipe that would flow to a subdrain installed beneath the landfill. The water from the surface seeps would not come in contact with waste and can be discharged to O'Leary Creek. It is also possible, that excavation of the sideslopes may eliminate the surface water seeps as the seeps are located at the geologic contact between the overlying terrace deposits (alluvial deposit) and the Pico Formation. The detailed geotechnical analysis accomplished as part of the engineering and design of the sideslope liner will provide the basis for developing the appropriate system to assure that the surface water seeps are addressed.
3. A mitigation measure has been included in the EIR specifying that the sideslope liner engineering and design shall include, as appropriate, methods to collect water from the surface water seeps. The inclusion of this mitigation measure in the EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 08-13

1. To respond to this comment, Section 3.3.5, paragraph 1 is revised to indicate that prior to the placement of "new" waste on top of previously landfilled waste, an intermediate soil barrier would be installed, which includes a landfill gas collection system beneath the intermediate soil barrier to remove gas from the waste already in place.
2. See Section 3.1 of this Final EIR for the change made to Section 3.3.5, paragraph 1 of the Draft EIR. This change does not alter the findings or conclusions of the EIR.

Response 08-14

1. Potential impacts associated with the proposed detention basin are limited to those impacts resulting from construction of the basin. These potential impacts are addressed in Sections 3.4 - Biological Resources, 3.6 - Cultural Resources, 3.7 - Paleontological Resources, 3.9 - Visual Resources, 3.10 - Noise, and 3.12 - Air Quality.
2. Regarding mosquito control, the basin would be for detention not retention, therefore, there would be no standing water in the basin. Detention basins are designed for stormwater to be detained for a short period of time to equalize runoff. Typically, water would not remain in the detention basin for longer than 24 hours. Therefore, the detention basin would not create an environment for breeding of mosquitoes and no mitigation measures are required.

Response 08-15

1. The mitigation measures for dust control, including those that do not require the use of water, is included in Section 3.12.7 of the Draft EIR (i.e., mitigation measures for air quality issues). These mitigation measures are also included in Table 1.1 of this Final EIR.

Response 08-16

1. See Response 08-12 above.

Response 08-17

1. As discussed in Section 3.5.3.1.1 of the Draft EIR, lighting would be required as part of the proposed project at the scalehouse, operation and maintenance center, and working face

during early morning and early evening operations. There would be no additional lighting requirements along the site access road as only a limited number of vehicles would enter the landfill in the early morning (approximately 12 vehicles from 5:30 a.m. to 6:30 a.m.) and early evening hours (approximately 24 vehicles from 5:00 p.m. to 7:00 p.m.) as shown in Tables F.1 and F.2 in Appendix F of the Draft EIR. Edge of road and center line reflectors would be installed on the site access road to assure traffic safety during the early morning and early evening hours.

2. As discussed in Section 3.9.3.1.3 of the Draft EIR, lighting at the above areas would be required during early morning (as early as 6:00 a.m.) and early evening (as late as 7:00 p.m.) operations, six days a week, during months when daylight savings time is not in effect (November through April). From May through October lighting would not be required.
3. The potential impacts associated with lighting from landfill operations and on the site access road during the early morning and early evening hours from November through April are addressed as appropriate in various sections of the Draft EIR, including Sections 3.4 - Biological Resources, 3.5 - Utilities, Services and Housing, and 3.9 - Visual Resources.

Response 08-18

1. It is acknowledged that in Ventura County, the LEA would rely upon input from the County Solid Waste Management Department in making a conformance finding with the County Solid Waste Management Plan (CoSWMP). As discussed in Section 3.8.1.5 of the Draft EIR, provisions for review and approval of a new landfill or the expansion of an existing landfill prior to the approval of the County Integrated Waste Management Plan (CIWMP) are included in PRC 50000.
2. PRC 50000 specifies that conformance with a CoSWMP is to be based on the procedures included in the CoSWMP. According to Ventura County's 1985 CoSWMP, conformance is interpreted to include (County, 1985):
 - Consistency with State Solid Waste Management policy.
 - Consistency with the goals and objectives of the CoSWMP.
 - Consistency with the facilities element of the CoSWMP.
 - Meeting local planning requirements (i.e., General Plan consistency, issuance of a CUP, and CEQA compliance).

Response 08-19

1. As discussed in Section 3.9.3.1.3 of the Draft EIR, lighting would only be required seasonally. Vehicles traveling along Toland Road would use headlights only during early morning (as early as 6:00 a.m.) and early evening (as late as 7:00 p.m.) during months when daylight savings time is not in effect (November through April). Residences along Toland Road and adjacent areas may have some illumination, however, due to the screening effects of vegetation, and the limited number of vehicles that would travel to and from the landfill during the early morning (approximately 12 vehicles from 5:30 a.m. to 6:30 a.m.) and early evening (approximately 24 vehicles from 5:00 p.m. to 7:00 p.m.) as shown in Tables F.1 and F.2 in Appendix F of the Draft EIR, this impact is not considered significant.

Response 08-20

1. In accordance with CCR Title 14, Division 7, an operational plan for the landfill will be provided in the Report of Disposal Site Information (RDSI). The type of onsite traffic control measures referenced in this comment (i.e., onsite road design, vehicle speed limits, and signage) would be included in the landfill operational plan.
2. Onsite traffic control measures are operational in nature and involve a level of detail typically not evaluated in an EIR. Moreover, some of the data needed to assess onsite traffic control (i.e., specific phasing and grading plans) are not available at the EIR stage. The requested information and onsite traffic control measures will be provided to the LEA as part of the RDSI.

Response 08-21

1. Through implementation of the operational procedures and regulatory requirements described in Section 3.14.5 of the Draft EIR, no significant odor impacts are expected. Based on this comment, additional operational procedures and regulatory requirements, and mitigation measures are included in the EIR to further assure that significant odor impacts would not occur from the proposed project. These include the following:

Operational Procedures and Regulatory Requirements

- Landfill gas collection and destruction systems shall be provided and operated, as required by APCD Rule 74.17.

Mitigation Measures

- Daily cover shall be applied immediately on top of any particularly odorous waste.

- Trained VRSD personnel shall periodically survey areas adjacent to the landfill for the presence of nuisance odors originating from the active working face.
 - 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.
2. The inclusion of these additional operational procedures and regulatory requirements, and mitigation measures in the EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project. See Table A.1 in Appendix A of this Final EIR for a combined listing of the operational procedures and regulatory requirements, and mitigation measures included in the EIR.

Response 08-22

1. The following additional mitigation measures have been included in the EIR to better define the litter control program:
- Litter control crews shall inspect the landfill fences (permanent and portable fences) on a weekly basis and remove litter.
 - During periods of high winds, litter control crews shall be dispatched at least twice a week, or more frequently if required, to inspect the landfill fences (permanent and portable fences) and remove litter.
 - 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.
2. The inclusion of these additional mitigation measures in the EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 08-23

1. As discussed in Section 3.15.3.1.1 of the Draft EIR, due to design features required within CCR Titles 14 and 23 for new or expanded landfills (e.g., application of daily and intermediate cover, landfill gas collection system), and load checking procedures that would identify and remove "hot" loads and suspected chemical wastes, subsurface fires have become rare or nonexistent. Due to the operational and regulatory requirements included in CCR Titles 14 and 23, no significant impacts from subsurface fires are expected from the proposed project.

2. While the risk of a subsurface fire at Toland is low, in the unlikely event of such a fire, routine monitoring activities at the site would allow for early detection and the appropriate response to prevent the fire from spreading and extinguishing the fire. The specific method for extinguishing a subsurface fire depends on the location of the fire in the waste prism and the suspected cause of the fire. In accordance with CCR Title 14, VRSD would immediately notify the LEA if a subsurface fire is suspected at Toland. The appropriate course of action to prevent the spread of the fire and to extinguish the fire would be developed in consultation with the LEA.

Response 08-24

1. As discussed in Section 3.15.3.1.2 of the Draft EIR, Toland would be gated and protected by a 5- to 6-foot high fence on a portion of the southern and western boundary of the site, and by a wire fence and/or topographic features that would limit access to the landfill around the remainder of the site to prevent unauthorized access. CCR Title 14 Section 17658 requires that the solid waste facilities "shall have a perimeter barrier or topographic constraints designed to discourage unauthorized entry." The combined use of fences and topographic features at Toland would provide site security in accordance with CCR Title 14, therefore, a fence around the entire perimeter of the site does not appear warranted.
2. As discussed in Sections 2.3.5.2 and 3.15.3.1.2 of the Draft EIR, waste hauling vehicles would undergo the following routine load checking program at the landfill to identify suspected nonpermitted waste:
 - **Scalehouse Inspection:** Prior to entering the landfill, each waste transporting vehicle, would be inspected at the scalehouse, with the exception of transfer trucks that have been processed through a transfer station/recycling center that has a load checking procedure. Such transfer trucks would be directed to the working face.
 - **Working Face Inspection:** For loads found to be acceptable at the scalehouse and directed to the active working face, a more detailed second inspection would occur as waste is deposited. This inspection would be conducted by specially trained staff, equipment operators, or landfill traffic controllers, with the intention of identifying, removing and documenting suspected nonpermitted wastes not discovered during the initial inspection at the scalehouse.

3. Regarding the inspection of transfer trucks, since transfer stations/recycling centers also are required to have Solid Waste Facilities Permits that normally include a requirement for load checking, it would not be necessary to conduct an inspection of transfer trucks at the scalehouse at the landfill. As discussed above, however, transfer trucks would be inspected at the working face.

Response 08-25

1. The random load checking program for Toland was summarized in Sections 2.3.5.2 and 3.15.3.1.2 of the Draft EIR. Additional detailed information will be provided in the RDSI.

VENTURA COUNTY FIRE PROTECTION DISTRICT

09

JAMES E. SEWELL
County Fire Chief



165 Durley Avenue
Camarillo, CA 93010-8586
(805) 389-9710
FAX (805) 388-4364

TO: LYNNE KADA,
VENTURA CO. PLANNING

DATE: NOVEMBER 1, 1995

FROM: R.M. SIMS, V.C.F.D.

SUBJECT: TOLAND LANDFILL
CUP 3141 MOD#3

THIS LETTER IS BEING WRITTEN IN RESPONSE TO THE REQUEST FOR FIRE
DEPT. INPUT TO THE D.E.I.R. PROCESS. AT THIS TIME FIRE HAS NO
ADDITIONAL CONCERNS OR REQUIREMENTS TO THIS PROJECT.

1

R.M. Sims FPO II

DOCUMENT 09
VENTURA COUNTY FIRE PROTECTION DISTRICT
RESPONSE TO COMMENTS

Response 09-1

1. It is noted that at this time the County Fire Protection District has no concerns or requirements with regards to the proposed project.



GENERAL SERVICES AGENCY
Recreation Services
County Government Center
800 South Victoria Avenue
Ventura, CA 93009
(805) 654-3963

November 2, 1995

TO: Lynne Kada, RMA Planning, L# 1740

FROM: Theresa Lubin, Program Administrator, L# 1030

SUBJECT: DEIR- Toland Landfill Expansion

Upon reviewing the above referenced document, I was surprised to find that Toland County Park was not included in Table 1.1 The Summary of Impacts and Mitigation Measures. In fact the document makes only limited reference to Toland Park which is less than 3000 ft. from the actual landfill footprint and is an adjacent property. The responses to concerns identified in the Initial Study Checklist were for the most part dismissed as not significant but were not substantiated by data. These concerns were based on the increases in noise and traffic, and degradation of air and water quality.

Water Quality is a concern primarily because the County owns the water rights to the Toland Park property and it is conceivable that at some point in time may take advantage of this.

The following are comments on the DEIR :

Pg. 3.8-13

3.8.2.2 Proposed Project Area

Toland Park

Sub-paragraph 2 : The description of the park needs to be amended to reflect that the County is in the process of reviewing various recreational uses for the park including a host site, with a permanent live-in caretaker, a golf course, and rehabilitation of the existing public use area which consists of individual and group picnic and bar-b-que sites, restrooms and parking. This public use area was built with State Land and Water Conservation Funds, and is

3
CONT.

currently open to the public. The location of this use is directly adjacent to Toland Road and will be significantly impacted by the increased truck traffic, noise, odor and litter resulting from an expansion of the landfill.

Pg. 3.13-9

Health Risk Proposed Project Closure and Postclosure - Tables 3.13.2, 3.13.3 and 3.13.4 respectively

4

Toland Park will have a live in host within 5 km of the site, the numbers should be revised to reflect this.

Pg. 3.14-11

5

1. Odors - The County Park is not mentioned under this section but will definitely be impacted along with Santa Clara School and residences on Toland Road.

Pg. 3.14-12

6

5. The operation at Toland landfill will be increasing substantially with the closure of Baillard. The current daily capacity of the landfill is increasing from 135 tpd to 1,500 tpd. The landfill is scheduled to close in 1996, this project would extend the operating life of the landfill another 31 years. The landfill is currently open Monday through Friday from 8:00 am to 4:00 pm. The proposed hours of operation are Monday through Saturday from 6:00 am to 6:00 pm. There will be an average of one vehicle every 50 seconds traveling either up to or down from the landfill in the worse case scenario, or every minute and 40 seconds in the proposed case.

The proposed project will have a significant effect on the recreational uses at the Toland Park site. In summation, these impacts include traffic, safety, illegal dumping, odor, litter, and water quality. These impacts have not been clearly identified as potentially significant, nor has mitigation been established to lessen them.

DOCUMENT 10
VENTURA COUNTY GENERAL SERVICES AGENCY
RECREATION SERVICES
RESPONSE TO COMMENTS

Response 10-1

1. The potential impacts from the proposed project to Toland County Park was included in the land use evaluation in Section 3.8 of the Draft EIR. Table 1.1 provided a summary of impacts and mitigation measures for the proposed project.
2. CEQA does not require that potential impacts be fully analyzed in an Initial Study. As stated in Section 15063 of the CEQA Guidelines, the purpose of an Initial Study includes assisting in preparation of an EIR by: (1) focusing the EIR on the effects determined to be significant; (2) identifying effects considered not to be significant; and (3) providing an explanation for determining that potentially significant effects would not be significant. The comments received on the Initial Study and Notice of Preparation for the proposed project, including those provided by the commenter, were addressed in the Draft EIR. Toland County Park was addressed specifically in Section 3.8 of the Draft EIR.
3. The potential impacts from water quality, noise, traffic, and air quality associated with the proposed project were evaluated in detail in the Draft EIR (see Sections 3.3, 3.10, 3.11 and 3.12, respectively), and included, as appropriate, specific impacts to Toland County Park. Noise, traffic and air quality were not dismissed as not significant in the Draft EIR. The potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

Response 10-2

1. Impacts to water quality from the proposed project are not considered significant. As stated in Section 3.3.8 of the Draft EIR, implementation of operational procedures, regulatory

requirements and mitigation measures would assure that impacts to water quality remain below a level of significance. At the time the County decides to take advantage of the water rights for Toland Park, the appropriate analyses would be required.

Response 10-3

1. As noted by the comment and discussed in Section 3.8.2.2.1 of the Draft EIR, the County is in the process of reviewing various recreational uses for Toland Park. This section of the Draft EIR also indicates that the park is currently available for limited use by permit.
2. As discussed in Sections 3.10 and 3.11 of the Draft EIR, significant impacts from the nonproject-related traffic volumes on Highway 126 with regard to traffic and noise at the intersection of Toland Road and Highway 126 would occur. Regarding the proposed project's noise and traffic impacts related to Toland County Park, Sections 3.10 and 3.11 of the Draft EIR concluded that noise and traffic impacts would be below a level of significance.
3. Regarding litter and odor, Section 3.14 of the Draft EIR described in detail the potential impacts from the proposed project. The potential litter and odor impacts were determined to be below a level of significance.

Response 10-4

1. As discussed in Section 3.13 of the Draft EIR, toxic air emissions associated with operations of the proposed project would not exceed the significance threshold for carcinogenic health risks at Toland County Park (probability of 10 in 1 million). This was calculated for public groups who may camp at the northwest corner of Toland County Park on long weekends (four days exposure).
2. In response to this comment, additional analysis was conducted for a live-in-host, who could live within 5 kilometers of the site. For purposes of this analysis, it is assumed that the potential live-in-host would be exposed to the potentially emitted toxic constituents at their maximum concentrations for 24 hours per day, 365 days per year, over a 40 year period (from age 25 to retirement at age 65). This is considered a conservative assessment of the maximum risk to which this individual could be theoretically exposed. The potential carcinogenic health risk probability would be 0.1 in 1 million. This would be well below the significance threshold for carcinogenic health risks of a probability of 10 in 1 million, and therefore would not result in a significant impact.

Response 10-5

1. As stated in Section 3.14.3.1.2 of the Draft EIR, odorous emissions are expected to be controlled and would not result in a significant impact at Toland County Park or other offsite locations.

Response 10-6

1. It is noted that the proposed project would increase the number of trucks traveling on Toland Road. As stated in Section 3.14.3.1.2 of the Draft EIR, however, the increased frequency of the passage of waste-haul trucks would not increase the potential for odors from these trucks to be perceived, and does not represent a significant impact.

PLANNING DIVISION
MEMORANDUM

November 2, 1995

TO: Keith Turner
FROM: Lynne W. Kadish
SUBJECT: CUP 3149 MO3 (Toland Landfill) - Comments on DEIR

GENERAL COMMENTS

1. DEIR Deficiencies Throughout Document
 - a. DEIR Fails to Identify Specific Mitigation Measures Used to Meet "Minimum Standards"
The DEIR statements that the project will be designed to meet "Minimum Standards" or to ensure that the project will not have an impact must be backed up by identifying the specific mitigation measures which will be incorporated into the project to ensure that these "minimum standards" will be met. For instance, what specific methods will be used to treat leachate in the retention basin prior to release into O'Leary Canyon (the DEIR should also note which agency, the County Flood Control District or RWQCB, will issue any required NPDES permits for discharge into O'Leary Canyon), and, all the items identified in Section 2.5.6 (Nuisance Monitoring and Controls) should be identified in their respective Chapter 3 Sections as Mitigation Measures.
 2. Additionally, the DEIR should also identify all entities which will be reviewing plans and programs to be submitted to the EHD/LEA in those instances where another agency may have an interest or responsibility for the same area covered by these plans or programs. For instance, the closure/post closure landscape plans submitted to the EHD/LEA will also be reviewed by the Planning Division (also see Biological Resources comments).

- b. Impacts with Identified and Evaluated Specific Mitigation Measures Incorrectly Identified as "Less Than Significant" Impacts
The DEIR is very misleading in that it incorrectly identifies most impact categories as insignificant although, at the same time, the DEIR includes identification and evaluation of mitigation measures for these "insignificant" impact categories. The DEIR should correct this misinformation by stating that these impacts are potentially significant, mitigation measures have been identified and, with implementation of these mitigation measures, the impacts will be reduced to a less than significant level. Failure to correct this defect makes the document a misleading, less than adequate public information document.

SPECIFIC COMMENTS

2. Project Description - Section 2.0
The proposed final tonnages must be finite, not approximate. The project description indicates "approximate" daily and final tonnages while the analyses and tables (which reference tonnages) are based on finite final tonnages. Also, both the modified CUP and the Solid Waste Facilities Permit (SWFP) need to be written for finite tonnages because the impact analyses are based on the same finite tonnages. Additionally, the next to last sentence of Paragraph 2, page 1-1 refers to the maximum volume of 1,500 tpd; the correct term is maximum tons.
3. Biological Resources - Section 3.4
See attached comments from Dave Magney, Fugro West.
4. Cultural Resources - Section 3.6
See attached comments from Roberta Greenwood of Greenwood & Associates. Copies of the site plans for the Toland expansion will be sent to Roberta Greenwood, since she has requested them. Any subsequent comments will not be included in these DEIR comments, but they will be used in developing permit conditions, should she so advise.
5. Paleontological Resources - Section 3.7
The DEIR dismisses the significance of the site with respect to Paleontological resources. However, the site is similar to both the Simi Landfill and Weldon Canyon site with respect to the formations in which the expansion area will be located. The significance level, mitigation measures and analyses, could, therefore, be similar to those found in the Weldon Canyon EIR and the most recent Simi Landfill analyses. The DEIR should identify the project's impacts as potentially significant, but that the mitigation measures identified in the DEIR should reduce the project impacts to a less than significant level.
6. Land Use - Section 3.8
 - a. General Plan/Land Use
See attached General Plan Section comments.
 - b. Agricultural Uses
Agriculture is a major industry in the County and, although the DEIR states it uses the County EIR format, it fails to include a separate Agricultural Resources section to evaluate project impacts on County agricultural resources. The DEIR should be revised to include a separate section which deals specifically with potential project impacts on existing and future agricultural resources and/or operations, including, but not limited to, agricultural land, crop production, operations, land under LCA Contract, etc. The potential direct and indirect

impacts on adjacent and "downstream agriculture and identification of specific mitigation measures which will reduce project impacts should be detailed.

c. Existing Oil/Gas Permit and Pipeline

The CUP 2271 permit boundary overlaps the Toland CUP and there is an approximately 6" diameter oil/gas pipeline which crosses the top portion of the permit area which must be identified in the project description. The ownership of both CUP 2271 and the pipeline must also be identified. The compatibility of the proposed permit expansion with the oil/gas permit and pipeline, along with appropriate mitigation measures, must be evaluated.

It should be noted that the Landfill Slitng Study identified in the DEIR included a detailed analysis of oil, gas and water pipelines located in O'Leary Canyon, which is immediately adjacent to the Toland Landfill permit area. Since Toland is adjacent to O'Leary Canyon, the DEIR should include the same level of analyses with respect to the O'Leary Canyon site's oil, gas and water pipelines analyses which are detailed in the Slitng Study. It is possible that the pipelines identified in O'Leary Canyon study may extend into the Toland site area.

d. Existing Oil Well Which Has Been Converted to a Water Well

CUP 2271 also includes an oil/gas well which, according to the State Division of Oil, Gas and Geothermal Resources (DOGGR) has been converted to a water well. The DEIR should address whether the proposed project could impact this water well.

7. Visual - Section 3.9

The DEIR should include an evaluation of night time lighting impacts on biological resources, on adjacent and nearby residences when the landfill elevation reaches a height so that the lights may impact these residences. The DEIR should also evaluate the impacts of vehicle headlights landfill related traffic.

8. Noise - Section 3.10

Please also see the attached General Plan comments referenced in Paragraph 3, above. The failure of the DEIR to identify and evaluate the effectiveness of any mitigation measures for cumulative noise hazard impacts to the Santa Clara School is a serious DEIR deficiency. Mitigation measures, which can become project conditions, are needed for this impact category. It is questionable that the required Zoning Ordinance permit findings, especially that of compatibility with surrounding land uses, can be made if there are no adequate conditions for the cumulative noise impacts to this existing, highly sensitive, land use. Another aspect of noise impacts to the school are related to the length of time eastbound vehicles will be idling at the Toland intersection while waiting to make a left turn onto Toland Road combined with the high noise levels generated when these vehicles are finally able to cross Highway 126 and increase their speed as they travel up the very steep Toland Road.

There are potential mitigation measures which need to be identified and their effectiveness and feasibility, both individually and combined, evaluated in the DEIR. These include, but are not limited to: a) construction of a concrete sound wall screened by landscaping; b) installation of "R" rated windows in the school house; c) relocation of the schoolhouse; and d) other potential mitigation measures which the consultant and/or VRSD, or other commenters, may identify (also see #10 below).

The DEIR should also evaluate the potential for increase noise impacts as the landfill becomes higher. And, the DEIR should distinguish between noise as a nuisance and noise as a hazard in the noise impact sections.

9. Traffic Safety - Section 3.11 (Transportation and Circulation) Section 3.15 (Health and Safety)

The DEIR should distinguish between traffic safety impacts as a transportation/circulation issue and as a health and safety issue.

The DEIR fails to identify the potential seriousness of traffic safety impacts related to vehicles traveling east along Highway 126 attempting to make a left turn onto Toland Road. These vehicles, including large refuse trucks and smaller privately owned vehicles, will have to enter a very short left turn pocket and then wait until westbound traffic clears sufficiently for the eastbound vehicles to make their left turn onto Toland Road. The safety impact is related to the number of vehicles which will be stacked up waiting to make the left turn. There is the potential for the situation to arise where several vehicles are stacked up, unable to make the left turn in a timely manner, and these vehicles may then block or partially block the fast lane of eastbound Highway 126.

The potential safety hazards resulting from these waiting vehicles include, but are not limited to: a) limiting ingress, egress and site visibility of vehicles associated with the Santa Clara School; b) blocking or partially blocking the fast eastbound Highway 126 lane, which would turn Highway 126 eastbound into a one lane road at this area; c) movement of slow, heavy trash vehicles transitioning from the outside (slower) eastbound Highway 126 lane into the faster moving inside lane prior to making the left turn onto Toland Road, which could potentially affect vehicles traveling in the fast lane; and d) the potential for movement of slower, loaded trash vehicles to shunt faster vehicles into the slower outside lane right in front of Santa Clara School, which could also create another traffic safety hazard.

The DEIR needs to address and evaluate the potential safety hazard related to each of the above identified potential traffic safety hazards, then identify and evaluate the effectiveness of mitigation measures.

The Agricultural Commissioner's Office has identified a potential mitigation measure for these impacts. There is a large, gravel truck underpass located approximately 0.5 miles east of Toland Road which could be used by all refuse and other Toland Landfill traffic. The vehicles could exit to the right of Highway 126, pass under Highway 126 and then travel west bound on Highway 126 to Toland Road to make a right turn onto Toland Road.

Failure of the DEIR to identify and evaluate potential traffic safety impacts along with adequate mitigation measures may make it difficult for the required Zoning Ordinance permit findings to be made if adequate conditions cannot be developed.

10. Nuisances - Section 3.14

a. Potential for Illegal Dumping

The Agricultural Commissioner's Office has raised the issue of the potential for illegal dumping to occur along Toland Road when the landfill is closed, and suggested fencing the agricultural properties along Toland Road which are not already fenced as a mitigation measure. The potential for increased illegal dumping needs to be addressed in the DEIR. Potential mitigation measures also need to be identified and their effectiveness evaluated. The following are additional potential mitigation measures which could be evaluated: a) daily surveillance and removal of illegally dumped solid waste; b) security guard on site after hours to direct individuals to return during normal business hours (and take down vehicle license numbers for follow up should solid waste be illegally dumped); c) security guard on site to collect fees along with open dumpster for private, small solid waste loads; d) maintenance of low light surveillance camera after hours to record after hour vehicles attempting to dump solid waste; and e) any combination of the above.

b. Vectors/Birds

The DEIR states that birds, including seagulls, have not been a problem at Toland Landfill and, therefore, are not expected to be a problem should the proposed expansion be approved. The DEIR does not, however, consider whether the closing of Bailard Landfill will encourage movement of the seagulls currently feeding at the Bailard Landfill to Toland when their food source is closed.

Should the seagulls move to Toland, there will be the potential for bird impacts, as well as the potential for these birds to come in conflict with Santa Paula Airport. The DEIR should address this issue, and contact should also be made with FAA since Toland Landfill appears to be located within the FAA influence boundary area.

c. Noise

See previous noise discussion found in paragraph 8.

Prohibition of Acceptance of Out-Of-County Solid Waste

The Project Description states that VRSD will prohibit Toland Landfill from accepting out-of-County solid waste but fails to identify the mechanism VRSD will use to limit the point of origin for solid waste brought to Toland Landfill. The DEIR must identify the mechanism VRSD will use to limit the point of origin for all solid waste brought to Toland Landfill so the County can appropriately condition the expansion, should it be approved, to not accept out-of-county solid waste. And, should VRSD wish to consider accepting solid waste from out-of-county sources at some future time, a permit modification and CEQA review will be required.

14. Alternatives - Chapter 4

The Alternatives Site discussion fails to adequately assess the "no project" alternative which could be argued to be the Environmentally Superior Choice. Current alternative arrangements for disposal of county waste without recourse to new or expanded in-county disposal capacity, such as the Western Ventura County JPA's RFP for waste disposal, should be assessed.

The DEIR appears to dismiss VRSD's own county-wide Landfill Siting Study, which rated various sites as superior to sites in the area of the Toland Road Landfill. Given the District's condemnation power through eminent domain, the reasons for excluding seemingly superior alternative locations should be explained.

The DEIR Alternative Sites discussion should include evaluation or comparison of alternative, fully lined sites, with that of Toland, where it is not possible to place a liner under the "old" or existing site although a liner will be placed between the "existing" solid waste and new solid waste, should the proposed expansion project be approved.

15. Reports Prepared for and Referenced by the DEIR - Appendices

The DEIR should incorporate the following 8 VRSD reports as Appendices:

Inventory And Evaluation Of Cultural Resources Within The Toland Road Landfill Project Area, Ventura County, California, June 1995;

Noise Assessment For The Toland Road Landfill Expansion County of Ventura, June 1995, Revised July 10, 1995;

Paleontologic Resource Evaluation Toland Road Landfill Ventura Regional Sanitation District, May 1, 1995;

Biological Resources Toland Road Landfill Expansion, Ventura County California, May 28, 1995;

Investigation of Surface Water Seeps In The Vicinity Of The Toland Road Landfill Ventura County, California, August 1995;

Focused Geologic Investigation Toland Road Landfill, July 1995;

Faulting and Seismicity Technical Report Toland Road Landfill, September 1995; and

Toland Road Landfill Expansion - Traffic Study, July 13, 1995.

Incorporation of these reports as Appendices would make the document a more complete public information document because the reports would be readily available to the public and decision makers for use in their review of the document. Additionally, these entities would

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95 OCT 25 PM 1:42

October 24, 1995

Mr. Thomas Berg, Director
Resources Management Agency
County of Ventura
800 South Victoria Avenue
Ventura, CA 93009

also have more complete information upon which to base their respective comments and/or decisions. (21) CONT.

RE: Review of EIR and Technical Report, VRSD for Proposed Toland Landfill Expansion

Dear Mr. Berg:

I have reviewed the section of the Draft EIR addressing archaeological resources and the supporting technical report for the above proposed undertaking.

The portion of the DEIR appears to be adequate, although I will offer a few suggestions below on technicalities which the County might want to address on this or, certainly, future archaeological submissions. I will assume that the DEIR also has a section on paleontological resources? This is not within my expertise, except to note that the region is known to be fossiliferous, and these resources should be covered. (22)

Comment on the DEIR:

a. Section 3.6.2.1.3. The history section deals in general with Rancho Sespe and the Santa Clara Valley, but provides no information about the use of this particular property. Such detail might give insight into the cement foundation. (23)

b. Section 3.6.2.2.1. Change temporary number of the site (KB-4), here and throughout the document, to the designated trinomial. (24)

3.6.4. Cumulative Impacts is misunderstood. Preservation, while always preferable, is not a cumulative impact. Instead, should discuss loss of other sites in the vicinity, other projects pending in the vicinity, increased access leading to vandalism and pothunting, increased traffic with construction personnel, vegetation brushing or clearing (?), potential for erosion, etc. (25)

Comment on the technical report:

a. I would have liked to see the actual project development map (grading, access roads, utilities, facilities, fill line). Without this, and knowing the site location, there is no way to assess whether the proposed expansion will have a direct or indirect affect on the cave resource. (26)

b. 3.3 Research Methods. Were old USGS maps checked for reference to the concrete foundation? Ownership/assessments? Was inquiry made to learn if this was an O'Leary structure, or if this family remembered it? (27)

It should be stated, estimated, and mapped which areas were and were not surveyed. (28)

c. 3.4. History. As stated above, lacks any information on this particular property.

d. 4.0. Results. How far are the O'Leary "ranch buildings" from the cement foundation?

On page 4-5, report says that the cement foundation is not "dated to the historic period." Of course it is, since the alternative is prehistoric. It should be better described: poured in forms, bolts for attachments, foundation or a slab, cement or concrete, relation to topography, etc. ?? Not enough data are provided to evaluate the author's assessment. Since the conclusion (p. 5.1) says that that the O'Leary ranch house and outbuildings were established in the early 1900s, one might suspect some association - if nothing else is known.

e. 5.3. Recommendations. At the very least, since not enough information is provided about the structural remains, suggest that item 3, "Should future operations or construction design changes..." be amended to include a statement that additional research and possible treatment are recommended if there will be any impact to the cement foundation.

f. 6.0. References Cited. Campbell Grant 1978 reference is incomplete.
J. H. Toulouse 1971 is incorrect.

I hope these comments will be useful.

Sincerely,
Roberta S. Greenwood
Roberta S. Greenwood

(28)
CONT.

(29)



FUGRO WEST, INC.

95-0CT-31-PH-5-19

5855 Olives Park Drive
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October 31, 1995
Project No. 95-61-0033

County of Ventura
Planning Division
800 South Victoria Avenue
Ventura, California 93009

Attention: Lynne W. Kada

Subject: Comments on the Biological Resources section of the Ventura Regional Sanitation District's Draft Environmental Impact Report, Toland Road Landfill Expansion and Landfill Closure/Postclosure. (State Clearinghouse No. 95031009.) CUP 3141 Mof#3.

Dear Ms. Kada:

Fugro has been contracted by the Planning Division of the County of Ventura to serve as its on-call staff biologist. In that capacity, Fugro has been asked to review the Biological Resources section of the Ventura Regional Sanitation District's Draft Environmental Impact Report (DEIR) for the Toland Road Landfill Expansion and Landfill Closure/Postclosure (State Clearinghouse No. 95031009) for adequacy under the California Environmental Quality Act (CEQA) and current biological and botanical scientific standards. The biological resources section of the DEIR was summarized from a separate technical report on the biological resources of the project site prepared by Hunt (1995); however, it was not appended to the DEIR.

The landfill expansion is proposed generally in a northerly direction from the existing landfill area. The DEIR states that the landfill expansion would adversely affect approximately 20 acres of land occupied by:

- 2.7 acres of coastal sage scrub;
- 9.6 acres of ruderal grassland;
- 1.4 acres of mixed ruderal grassland/coastal sage scrub; and
- 6.4 acres of barren locales (DEIR section 3.4.3.1.1).

Sensitive plant and animal taxa expected from the region of the project site were listed, described briefly, surveyed for during May 1995, assessed, and impacts identified. In addition, mitigation measures were recommended for significant adverse impacts identified in the DEIR.



In summary, our review of the Biological Resources section of the DEIR and Hunt (1995) found several areas of the DEIR failed to adequately describe or analyze biological resource issues as listed below:

1. Scalebroom Scrub vegetation;
2. Coastal Sage Scrub as a sensitive plant community;
3. Nonvascular plants (e.g., lichens and bryophytes);
4. Invertebrates;
5. Affects on Los Angeles Pocket Mouse;
6. Invasive exotic plants;
7. Revegetation - specifications for use of native plants;
8. Erosion Control/Water Quality; and
9. Cumulative affects of biological resource losses in the region or County.

These issues are further examined in the following sections.

Scalebroom Scrub

Scalebroom Scrub occurs in the study area, however, it is not described in the DEIR or Hunt (1995). Scalebroom Scrub was recently described by Magrey (1992) as a distinct native plant community restricted to floodplain habitats containing riverine cobbles, boulders, and sand. Previously to 1992, Scalebroom Scrub was typically included into other plant communities, such as Riversidian Alluvial Fan Sage Scrub, a sensitive plant community as defined by the California Department of Fish and Game, Natural Diversity Data Base.

While the DEIR briefly mentions Scalebroom as a component of Coastal Sage Scrub occurring on O'Leary Creek terraces (page 3.4-3) and Hunt (1995) mentions it as a part of "Floodplain Mixed Scrub", neither evaluate Scalebroom Scrub as a distinct or sensitive and rare plant community. No maps are provided to show the location, extent, or distribution of Scalebroom Scrub at the project site, nor is their any discussion about this natural plant community's sensitivity at the project site, locally, regionally, or statewide.

The DEIR needs to be revised in the following areas to allow reviewers and decisionmakers sufficient information to determine project-related impacts to rare Scalebroom Scrub vegetation.

- Describe Scalebroom Scrub as it occurs at the project site;
- Map the extent of Scalebroom Scrub at the project site;



- Analyze any direct, indirect, and cumulative impacts to Scalebroom Scrub as a result of the proposed project; and
- Make recommendations to avoid, reduce, or mitigate any significant adverse impacts, including cumulative, the proposed project will have on Scalebroom Scrub.

Coastal Sage Scrub

Coastal Sage Scrub vegetation is briefly and generally described in the DEIR and Hunt (1995). The DEIR and Hunt (1995) mention that the Coastal Sage Scrub community is diverse and represented by several dominant species associations; however, it is only generally mapped. The reviewer lacks any information on the extent or location of each Coastal Sage Scrub association.

Coastal Sage Scrub has routinely been mapped at the association level for the last several years in recognition of its species richness and habitat diversity. For example, the Orange County Environmental Management Agency (EMA) required and contracted for a detailed description, mapping, and analysis of all Coastal Sage Scrub associations as part of its Habitat Classification System Natural Resources Geographic Information System (GIS) Project (August 1991) (hereafter referred to as the HCS). The Coastal Sage Scrub community associations were further described and refined by Jones & Stokes Associates in 1992 for the Orange County EMA.

Coastal Sage Scrub, as a whole and on the association level, has been determined to be a sensitive and declining plant community by the scientific community (Westman, 1981; Westman, 1986; Atwood 1990; Jones & Stokes Associates, 1992; Davis et al., 1995). Davis et al. (1995) consider Coastal Sage Scrub a natural community at risk because less than five percent of this community is protected in parks, reserves, and conservation easements, and none in Ventura County. Coastal Sage Scrub is found in the coastal regions from the South Coast Ranges to Baja California at elevation up to 3,000 feet (Holland, 1986). Since Coastal Sage Scrub occurs primarily on the low hills and mountain slopes of coastal California, it has been largely removed or fragmented from many areas of southern California, including Ventura County. Many acres of Coastal Sage Scrub in Ventura County have been converted to houses or orchard crops. While no definitive studies of the extent (historical or current) of Coastal Sage Scrub have been conducted for Ventura County, a large percentage of Coastal Sage Scrub in Ventura County has already been destroyed or disturbed.

At least two Coastal Sage Scrub plant associations can be identified from the DEIR text: Purple Sage and California Bush Sunflower-Purple Sage-California Sagebrush. Additional associations are likely to be present, based on the text description and the vascular plant species list provided in Appendix D.1 of the DEIR.



County of Ventura Planning Division
October 31, 1995 (95-61-0033)

Affects on Los Angeles Pocket Mouse and Desert Woodrat

The DEIR discounts any potential impacts to the Los Angeles Pocket Mouse, a Category 2 candidate for Federal listing as an endangered to threatened species and a California Species of Special Concern, because it "was not observed onsite, and the only possible habitat is the elevated northern periphery of the project area" (page 3.4-14). This is in contradiction to what Hunt (1995) reported "this species may inhabit similar habitats in the Santa Clara River Valley. The northern portion of the project area hold the greatest potential for harboring this species. Live trapping would be the only way to determine if this species occurs on-site". Hunt (1995) can be interpreted to state that suitable habitat is present at the project site, with the best suitable habitat occurring at the northern portion of the site, not the "only possible habitat" as stated in the DEIR.

Even though Hunt (1995) recommends live trapping to determine the presence or absence of the Los Angeles Pocket Mouse at the project site, the DEIR dismisses any potential significant impact to it and other sensitive wildlife species, such as the Desert Woodrat and San Diego Horned Lizard, because the habitat has been degraded or is fragmented. The DEIR improperly concluded that impacts to these sensitive species were less than significant because they were either not seen or the habitat was less than optimal. If habitat is present and the species was not observed because more intensive surveys are required to determine its presence/absence, the preparers should conclude that the habitat is indeed occupied and that the species would be adversely affected if the habitat is proposed to be destroyed or altered. In the case of the Los Angeles Pocket Mouse, Hunt (1995) stated clearly that no conclusion about its presence could be made without live trapping and that habitat was present. Therefore, without additional survey work, prudent science would conclude that the site may be occupied.

The Desert Woodrat was observed; however, impacts to it were considered to be less than significant in the DEIR because "the proposed project would disturb only 2.7 acres ... of potential habitat" (page 3.4-17). Like the Los Angeles Pocket Mouse, the Desert Woodrat is a C2 candidate for federal listing and a California Species of Special Concern; however, impacts to this species' habitat was discounted because of the small areal extent of habitat would be disturbed. However, no quantitative data were provided to suggest that the loss of 2.7 acres of habitat would be less than significant. Additionally, this loss was not addressed for cumulative impacts. Clearly, if a species is being considered for listing as an endangered or threatened species and is a Species of Special Concern to resource agencies, then cumulative losses of habitat for them should be identified and addressed in CEQA documents.

The DEIR should be modified to address the direct, indirect, and cumulative impacts the proposed project would have on these, and other, sensitive wildlife species. If additional field surveys are not conducted to determine presence or absence, the CEQA document should assume that a significant impact would occur and provide appropriate mitigation for the impacts.



County of Ventura Planning Division
October 31, 1995 (95-61-0033)

To satisfy CEQA, the DEIR needs to be revised or supplemented to more fully assess Coastal Sage Scrub vegetation at the project site, map it at the association level, and assess its environmental sensitivity relative to the project site, region, County, and state. If direct or cumulative impacts are found to be significant, appropriate mitigation should be evaluated and recommended, such as preservation of existing Coastal Sage Scrub associations (possibly onsite) and revegetation of the landfill upon closure with in-kind Coastal Sage Scrub.

Nonvascular Plants

Nonvascular plants (i.e., lichens, bryophytes, algae, fungi) are important components of the biological diversity and species richness of the natural environment. Neither the DEIR or Hunt (1995) make any mention of nonvascular plants as they relate to the landfill expansion project. While nonvascular plants have often been ignored in environmental documents, *State CEQA Guidelines* and the Federal and California Endangered Species Acts do not distinguish between vascular and nonvascular plants. Therefore, CEQA documents should include analyses of nonvascular plant resources that may be adversely affected by discretionary projects. The Ventura County Planning Division has previously required evaluations of nonvascular plants (i.e., lichens) under CEQA for the Weldon Canyon Landfill EIR. Furthermore, scientific organizations such as the California Native Plant Society have stated policies that nonvascular plants need to be evaluated during the CEQA process (copy of CNPS policy is attached).

To satisfy CEQA, the DEIR should be revised to include an examination of the nonvascular plant resources present at the project site and what effects the proposed project will have on them.

Invertebrates

Invertebrates (e.g., insects, arachnids, mollusks, annelids) are important components of the biological diversity and species richness of the natural environment. Neither the DEIR or Hunt (1995) make any mention of invertebrates as they relate to the landfill expansion project. While invertebrates have often been ignored in environmental documents, except for butterflies, *State CEQA Guidelines* and the Federal and California Endangered Species Acts do not distinguish between invertebrates and larger forms of wildlife species. Therefore, CEQA documents should include analyses of invertebrate resources that may be adversely affected by discretionary projects such as the Toland Road Landfill Expansion project.

To satisfy CEQA, the DEIR should be revised to include an examination of the invertebrate resources present at the project site and what effects the proposed project will have on them.





Invasive Exotic Plants

The DEIR makes no mention about the potential affects of invasive exotic plants that may be introduced to the natural communities of the area as a result if the landfill expansion. Invasive exotic plants are expanding their ranges throughout California and cause significant amounts to the natural environment. Many of these plants are introduced or encouraged to spread by human activities, especially land disturbance and dumping of vegetative material.

The DEIR needs to be revised to address the issue of invasive exotic plants that may be introduced to the natural communities surrounding the landfill. The DEIR should provide mitigation measures to reduce potential introductions of invasive exotic plants at the project site and suggest measures to eradicate and control invasive exotic plants that presently occur at the landfill.

Revegetation - Use of Native Plants

The wording describing a revegetation plan (page 3.4-19) provides little to almost no direction on what the goals and objectives of the revegetation plan should be. Numerous issues should be addresses here concerning the timing, procedures, and potential adverse affects of revegetation if not done properly. The revegetation plan should include a discussion on what species should be used during revegetation, where should the propagules come from, what restrictions or guidelines should be implemented when conducting the revegetation.

The revegetation plan needs to more explicitly describe the recommended requirement that only native plants indigenous to the region of the landfill be used for planting and revegetation purposes. Furthermore, the DEIR failed to mention the affects the proposed project may have on the natural communities of increased introductions of nonnative invasive exotic species that could invade and potentially outcompete native species.

This potential impact should be addressed in the DEIR and management recommendations made to eradicate existing invasive exotic populations and prevent and control future invasions.

Erosion Control/Water Quality

The DEIR neglects to provide measures to reduce or eliminate any adverse affects project-related erosion would have on water quality that may degrade wildlife habitat, or cause the loss of otherwise adversely affect natural vegetation. Hunt (1995) provided several detailed mitigation measures to address this issue; however, they were not included in the DEIR. Hunt (1995) suggested using leachate barriers and monitoring wells to reduce possible adverse impacts to riparian and wetland habitats in O'Leary Canyon.

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Cumulative Affects

Section 3.4.4 of the DEIR (page 3.4-19) appears to minimize the cumulative impacts to natural habitats by restricting the project impacts to those that would affect only undisturbed natural vegetation, to "less than 3 acres" that would take place incrementally over the life of the landfill. All the natural habitats present at the project site, disturbed or not, is still habitat. The DEIR nor Hunt (1995) provided any measurement of the functions and values of any of the habitats at the project site; therefore, how can the preparers make such conclusions. Even ruderal (disturbed) habitats provide habitat to some plant and wildlife species. Furthermore, these disturbed areas provide recruitment opportunities for species from surrounding habitats.

This reviewer agrees, however, that the impact to the natural habitats will be incremental and temporary in nature, assuming that the entire landfill area will be restored with natural vegetation, in-kind.

As described for Scalebroom Scrub, Coastal Sage Scrub, nonvascular plants, and invertebrates, the cumulative impacts to these resources are wanting in the DEIR. If analysis finds these resources to be adversely, the proposed project may also have a cumulative impact on them, which needs to be addressed in the DEIR to satisfy CEQA requirements.

Minor Corrections

The Biological Resources section of the DEIR contains many minor errors that should be corrected but do not, in themselves, speak to the adequacy of the DEIR as a CEQA document.

Scientific Nomenclature. The scientific nomenclature used should be what is currently used by the scientific community. The DEIR uses outdated nomenclature for vascular plants (Munz, 1974) when the currently accepted standard in California is Hickman (1993). The DEIR should be modified to use the current standard. The reference to thistles on Page 3.4-4 incorrectly suggests that *C. melitensis* is a member of the genus *Carthus*; however, it belongs to the genus *Centaurea*. The genus name of Olive is misspelled as *Oleo*; the correct spelling is *Olea* (page 3.4-8). The correct spelling for Fishs Milkwort is *Polygala cornuta*, not *P. cornute* (page 3.4-10).

Common Names. While common names for plants have not been standardized as they have been for birds and mammals, some have been given common names that are used consistently and the DEIR should use the names that are most commonly used. *Baccharis pilularis* should be called Coyote Brush instead of Coyote Bush (pages 3.4-3 and 3.4-9). Scalebroom should be one word without a hyphen (page 3.4-3). Mule Fat is two words, not one as shown on pages 3.4-8 and 3.4-9.

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Conclusions

The Biological Resources section of the DEIR is deficient in its discussion and analysis of impacts to the environment concerning sensitive natural vegetation (Coastal Sage Scrub, Scalebroom Scrub), nonvascular plants, invertebrates, sensitive mammals, invasive exotic plants, revegetation, cumulative impacts, and sufficient mitigation measures. The DEIR should be revised or amended to address these areas to be considered adequate under CEQA. In addition, the DEIR should incorporate many of the recommended mitigation measures as presented by Hunt (1995) to mitigate for adverse impacts to wildlife movement, erosion control, and control of invasive exotic plants.

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Fugro is pleased to assist the County with review of the Toland Road Landfill Expansion project. Please contact me at (805) 650-7000 if you have any questions about this review.

Sincerely,

FUGRO WEST, INC.

David L. Magney
Senior Program Manager, Natural Resources

DLM:dc

Attachment: California Native Plant Society Nonvascular Plant Policy

California Native Plant Society

1722 J Street, Suite 17 • Sacramento, CA 95814 • (916) 447-2677 • FAX (916) 447-2727

Statement of Policy Nonvascular Plants

Concerns Relating to Conservation of Nonvascular Plants.

The California Native Plant Society is concerned that nonvascular plants (cryptogams) such as lichens, algae, fungi, mosses, and liverworts, are not usually considered as a biological resource by resource agencies or other lead agencies in California Environmental Quality Act (CEQA) or General Plan Law documents.

By their ubiquity, abundance, and diversity, nonvascular plants are an important component of the California flora. Many occupy habitats inhospitable to vascular plants and may be the only plant taxa that occupy certain sites.

These plants, macro- and microscopic, are critical and essential within the integrated ecosystems. They provide habitat, forage, and refuge for terrestrial and aquatic vertebrates and invertebrates. They modify soil or rock substrate which may allow other plants to attach and grow, thereby increasing the potential diversity of habitat. They reduce organic material and enhance uptake of nutrients into other plants, perhaps serving as symbionts, and fixing nitrogen that becomes available to other organisms.

Nonvascular plants have been reduced in number, diversity, abundance, and range (as many species in natural areas) by the reduction in habitat area. Aquatic (freshwater and marine) and terrestrial (desert, forest, grassland, scrub, chaparral, and woodland) systems have all been affected to some extent by human activity.

Some groups of nonvascular plants can be used to indicate the environmental health of an area. Population changes of some species may be valuable for measuring the effects of human activities on the environment. For example, the loss of lichens may indicate increased air pollutants. The loss of mosses may suggest a decrease in soil moisture. A change in the abundance of algae may indicate chemical or temperature changes of water.

With these thoughts in mind, the CNPS makes the following policy statement concerning nonvascular plants.

WHEREAS nonvascular plants are valid taxonomic entities and are an important component of the flora of California; and



Dedicated to the preservation of California native flora

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WHEREAS nonvascular plants provide valuable biological functions, such as: providing habitat for invertebrates, providing forage for terrestrial wildlife and birds, and reducing soil or rock substrates to sand or silt sized particles to create soils; and

WHEREAS nonvascular plants of all types have been reduced from historic extent and are being lost or adversely impacted at a rapid rate throughout California; and

WHEREAS rare nonvascular plants have not been provided legal protection by listing as threatened or endangered under the federal or state Endangered Species Acts; and

WHEREAS nonvascular plants can be important indicators to the health of the environment; and

WHEREAS nonvascular plants add to the biodiversity of the natural environment.

The California Native Plant Society:

HEREBY supports all efforts to preserve and conserve native nonvascular plants of all types; and

HEREBY opposes projects that adversely affect the continued viability of native nonvascular plants of any type unless appropriate mitigation is provided to compensate, in-kind, for losses of native nonvascular plants prior to project impacts; and

HEREBY recommends avoidance of impacts to native nonvascular plants; and

HEREBY urges full enforcement of all laws and regulations concerning nonvascular plants that are consistent with CNPS policies and purposes; and

HEREBY supports and recommends listing of rare nonvascular plants as threatened or endangered under the federal and state Endangered Species Acts as appropriate; and

HEREBY supports and recommends state and local government adoption of policies and ordinances to protect and conserve all types of native nonvascular plants and communities; and

HEREBY recommends that all CEQA and General Plan Law documents address impacts to native nonvascular plants and communities for projects that may adversely affect them.

DOCUMENT 11
VENTURA COUNTY PLANNING DIVISION
RESPONSE TO COMMENTS

Response 11-1

1. As discussed in Section 3.1.3 of the Draft EIR, the operational procedures and regulatory requirements, and mitigation measures identified in the various topical sections of Chapter 3.0 of the Draft EIR shall be incorporated into the proposed project's design and operational procedures, and may be included as specific conditions in permits issued by regulatory agencies. Incorporation of the measures included in Chapter 3.0 of the Draft EIR into the proposed project would assure that "minimum standards" are met. In addition, as discussed in Section 1.3.2 of the Draft EIR, implementation of the measures included in Chapter 3.0 of the Draft EIR are required to make the impacts findings included in the EIR. Table A.1 in Appendix A of this Final EIR includes a combined list of the operational procedures and regulatory requirements, and mitigation measures included in the EIR.

2. Regarding the example provided in this comment, as discussed in Section 2.5.3 of the Draft EIR, the proposed project includes a stormwater "detention" basin not a "retention" basin as noted by this comment. The difference between a detention basin and retention basin is significant. A detention basin is designed to detain stormwater for a short period of time to equalize runoff. Typically, water would not remain in the detention basin for longer than 24 hours. A retention basin is designed to retain a specific volume of water over a long-term period and may incorporate either percolation or evaporation as the means of removing water from the basin.

3. The second question raised by the example provided in the comment regards "... specific method ... used to treat leachate in the retention basin ..." As discussed in Section 3.3.3.1.3 of the Draft EIR, the proposed project would divert surface water runoff, including stormwater, away from the active working face. Only surface water that had not come in contact with waste would be diverted to the detention basin. Leachate would not flow to the detention basin, rather, as discussed in Section 2.5.2 of the Draft EIR, leachate would be collected in sumps and would be taken to VRSD's Liquid Waste Treatment Facility or another wastewater treatment facility.

4. Regarding which agency would issue the required National Pollution Discharge Elimination System (NPDES) permit for the project, as discussed in Section 1.5.2.3 of the Draft EIR, the RWQCB would issue this permit for the proposed project.

Response 11-2

1. Section 1.5 of the Draft EIR provides an overview of the responsible agencies anticipated to be involved in the proposed project. The responsible agencies have the ability through their permitting process to establish conditions for the proposed project. These conditions can be used by each agency to identify which of the proposed project's plans and programs the agency will review/approve.

Response 11-3

1. The topical sections of Chapter 3.0 of the Draft EIR include a section (i.e., 3.2.6, 3.3.6, etc.) that discussed the level of significance of the impact before mitigation. The level of significance of the impacts is based on the significance thresholds established for the topical areas and the nature of the impacts associated with the proposed project. While CEQA requires that mitigation measures be included, where feasible, for impacts that are deemed significant, it does not preclude the inclusion of mitigation measures for impacts that are found to be below a level of significance. As appropriate, the mitigation measure sections of the topical sections of Chapter 3.0 of the Draft EIR (i.e., Sections 3.2.7, 3.3.7, etc.) indicate if any mitigation measures are included even though the impacts are below a level of significance.

Response 11-4

1. For the purpose of the various permits for the proposed project, the capacity of Toland would increase to a total of up to a maximum of 30 million cubic yards or up to a maximum of 15 million tons of waste. See Section 1.0 of this Final EIR for the revised text regarding the capacity of Toland. This change does not alter the findings or conclusion of the EIR.
2. Regarding the daily tonnage, in Section 1.0 and elsewhere in the Draft EIR the daily tonnage proposed for Toland is consistently stated as a maximum of 1,500 tpd of waste. The term "approximate" is not used in the Draft EIR when referring to the daily tonnage limit proposed for Toland.

3. It is agreed that rather than "... maximum volume of 1,500 tpd" this sentence should read "... a maximum of 1,500 tpd." See Section 1.0 of this Final EIR for the revised text. This correction does not alter the findings or conclusions of the EIR.

Response 11-5

1. As discussed in Section 3.7.6 of the Draft EIR, the proposed project would not result in significant impacts to paleontological resources. The findings of the Draft EIR are supported by the paleontological technical report prepared for the project (Winterfeld, 1995).
2. As discussed in the Draft EIR, the paleontological assemblages identified in the project area have a low to moderate potential for containing scientifically important fossils. In addition, the limited onsite exposure of the Saugus Formation, the formation identified as having the greatest potential for producing significant paleontological resources onsite, is for the most part not located in areas planned for land-altering activities and would not be affected by the proposed project. Limited exposures of the Saugus Formation may be affected by the construction of the operations and maintenance center and detention basin on VRSD's 53-acre parcel.
3. Although the project would not have a significant impact on paleontological resources (see Section 3.7.6 of the Draft EIR), mitigation measures are included in the EIR to assure that potential impacts to paleontological resources that could be discovered during construction activities remain below a level of significance. These measures would assure that construction on VRSD's 53-acre parcel do not significantly impact paleontological resources in the Saugus Formation. These mitigation measures are included in Table 1.1 of this Final EIR.

Response 11-6

1. This comment raises an issue regarding organization of the Draft EIR, but does not raise a technical issue regarding the findings or conclusions of the Draft EIR. Potential land use impacts from the proposed project, including potential impacts to agricultural operations in the vicinity of the project, are addressed in Section 3.8 of the Draft EIR. Specifically, agricultural land use issues related to the proposed project were discussed in Section 3.8.3.2.2 of the Draft EIR.

Response 11-7

1. CUP 2271 was an oil and gas development permit issued by the County to Arid Oil Company. In accordance with the permit, the CUP expired upon Arid's abandonment of the oil wells (Kada, 1995). Based on discussions with the County Planning Division, as the CUP has expired and the oil wells have been abandoned, the County has determined that these land uses would not represent a compatibility issue with the proposed project (Kada, 1995).
2. The approximate 6-inch diameter pipeline referenced in this comment is an active ARCO crude oil line. The pipeline crosses the uppermost, northeastern corner of the Toland property boundary. It is not located within the proposed landfill footprint or grading area for the proposed project. VRSD has consulted with ARCO personnel to confirm the status of the pipeline and to assure that necessary safety precautions are implemented (Cragin, 1995). ARCO has agreed to inspect the line (e.g., for potential exposure), post new signage, and mark the pipeline easement with a fence or other improvement.
3. The VRSD Landfill Siting Study referenced by this comment did not include a "... a detailed analysis of oil, gas and water pipelines located in O'Leary Canyon,..." A review of the study determined that it did not specifically identify pipelines located within the O'Leary Canyon site. It has been determined, however, that the ARCO pipeline discussed above also traverses the northern portion of the O'Leary Canyon site from west to east.

Response 11-8

1. Based on State Division of Oil, Gas and Geothermal Resources (DOGGR) records, the oil well referenced in this comment was abandoned in December 1965 (Fields, 1995). DOGGR's records indicate that upon abandonment, the well was converted to a water well and transferred to the owner of the property at that time (i.e., William O'Leary). The records indicate the well was located 150 feet south and 150 feet east of the center of Section 29, Township 4 North, Range 20 West, San Bernardino Base and Meridian. Based on this description, the well was located just west of the landfill access road near the location of the proposed water storage tank (see Figure 2.4 of the Draft EIR). DOGGR did not maintain records on this well subsequent to its transfer to William O'Leary.
2. The County Public Works Agency does not have any formal record of this well (Hoffman, 1995). The only record on file with the County for this well was in response to an April 1984 inquiry, and indicates at that time no surficial evidence of the well could be located.

3. If this well still exists, it is located within property owned by VRSD. Based on information from DOGGR and the County, VRSD considers the well to be abandoned. Based on the location of the activities associated with the proposed project and the status of this well, the proposed project would not directly affect this well. To eliminate the potential for indirect water quality impacts resulting from this abandoned well, the following mitigation measure has been included in the EIR:
 - An investigation shall be conducted in the vicinity of the recorded location of the abandoned well. If the well is located on VRSD property, and the 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.
4. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 11-9

1. The potential impacts associated with lighting during the early morning and early evenings from November through April are addressed as appropriate in various sections of the Draft EIR, including Sections 3.4 - Biological Resources, 3.5 - Utilities, Services and Housing, and 3.9 - Visual Resources.
2. Lighting would be required as part of the proposed project at the scalehouse, operation and maintenance center, and working face seasonally during early morning and early evening operations. There would be no additional lighting requirements along the site access road as only a limited number of vehicles would enter the landfill in the early morning (approximately 12 vehicles from 5:30 a.m. to 6:30 a.m.) and early evening hours (approximately 24 vehicles from 5:00 p.m. to 7:00 p.m.), as shown in Tables F.1 and F.2 of Appendix F of the Draft EIR. Edge of road and center line reflectors would be installed to assure traffic safety during early morning and early evening hours.
3. Lighting at the above areas would be required during early morning (as early as 6:00 a.m.) and early evening (as late as 7:00 p.m.) operations, six days a week, during months when daylight savings time is not in effect (November through April). From May through October lighting would not be required.

4. Potential impacts to wildlife from lighting were discussed in Section 3.4.3.1.3 of the Draft EIR. These impacts were considered to be below a level of significance as lighting would be shielded and directed onto specific areas and would only be required seasonally (i.e., November through April) during early morning and early evening hours.
5. Vehicles traveling along Toland Road and the landfill access road would only use headlights seasonally (i.e., November through April) during early morning (as early as 6:00 a.m.) and early evening (as late as 7:00 p.m.). Residences along Toland Road and adjacent areas may have some illumination, however, due to the screening effects of vegetation, and the limited number of vehicles that would travel to and from the landfill during the early morning (approximately 12 vehicles from 5:30 a.m. and 6:30 a.m.) and early evening (approximately 24 vehicles from 5:00 p.m. and 7:00 p.m.), as shown in Tables F.1 and F.2 in Appendix F of the Draft EIR, this impact is considered to be below a level of significance.

Response 11-10

1. As discussed in Section 3.10.6 of the Draft EIR, the existing and future nonproject traffic-related cumulative noise conditions along Highway 126 in the project vicinity constitute a significant impact. The Draft EIR also discussed, however, that the project-related traffic volume would result in only an incremental increase to noise level at the Santa Clara School when compared to the existing and future nonproject traffic-related cumulative noise levels. Based on this finding, Section 3.10.8 of the Draft EIR specifies that a statement of overriding considerations for the cumulative nonproject traffic-related noise impact will be required.
2. As discussed in Section 3.10.4 of the Draft EIR, the proposed project's contribution to the traffic-related cumulative noise impact would be a maximum increase of 0.6 dBA under the "worse case" traffic scenario for 2015. Moreover, the noise impact due to nonproject-related cumulative traffic on Highway 126 extends beyond the vicinity of the Toland Road. Noise conditions along Highway 126 represent a regional issue and are not the responsibility of VRSD. Mitigation measures for the nonproject-related cumulative noise impacts were, therefore, not proposed as part of the proposed project.
3. It is acknowledged that the County is responsible for determining appropriate project conditions and to consider surrounding land use compatibility when making required County Zoning Ordinance findings. It is important to note, however, that County Zoning Ordinance findings are based on project specific impacts only and are not based on cumulative impacts.

4. The following County General Plan noise standard applies to the proposed project:
 - 1-hour Leq (equivalent noise level) of 55 dBA, or ambient noise level plus 3 dBA (whichever is greater) during any hour between 6:00 a.m. and 7:00 p.m.

As long as the project specific noise impacts do not result in an increase in excess of 3 dBA, the project is considered to meet the County General Plan standards and a consistency finding, as required by the County Zoning Ordinance, can be made. As discussed above, the proposed project's contribution to the traffic-related cumulative noise level at the Santa Clara School would be a maximum of 0.6 dBA under the "worse case" traffic scenario for 2015. Therefore, the proposed project does not exceed the applicable County General Plan noise standard and a consistency finding can be made under the County Zoning Ordinance.

5. As noted in this comment, mitigation of the cumulative noise impacts from the nonproject-related traffic volumes on Highway 126 could include the construction of a sound wall along portions of the highway, and/or window and/or building retrofitting of Santa Clara School. As with traffic impacts, measures to mitigate conditions within the right-of-way of Highway 126 would require review and approval by Caltrans. Proportionate (i.e., "fair share") funding of these improvements could be considered by the County for individual projects which contribute to traffic on Highway 126.
6. This comment also expressed a concern that waste trucks idling at the intersection of Toland Road and Highway 126 intersection would result in high noise levels. As discussed in Section 3.10.2.3 of the Draft EIR, during the noise measurements taken for the project study, trucks making left or right turns on Toland Road were normally not audible over the traffic noise on Highway 126 (MGA, 1995). The highest noise levels were associated with nonproject-related trucks passing by in the nearest lane at high speeds. Under existing conditions, plus the proposed project, an average delay of approximately 7 seconds for left turn movements from Highway 126 onto Toland Road is estimated (WPA, 1995). This does not represent a significant increase over the approximately 6 second delay currently experienced by waste trucks at this intersection.
7. Under future, cumulative conditions in 2015, average delays of 19 and 13 seconds are estimated for conditions with and without the proposed project, respectively, for left turns at the Toland Road/Highway 126 intersection (WPA, 1995). Since these delays would be associated with a substantial increase in nonproject-related through traffic on Highway 126 (approximately 72 percent as projected by Caltrans), it can be anticipated that the greatest noise source which would affect Santa Clara School would continue to be nonproject-related trucks passing by in the nearest lane.

8. The noise study also considered the relatively steep grade of Toland Road. Noise measurements of waste trucks were taken along a steep portion of Toland Road (approximately 8 percent grade) to determine the potential impact of truck noise on surrounding sensitive uses (MGA, 1995). The noise level data was incorporated into Section 3.10.3.3 of the in the Draft EIR.

Response 11-11

1. As discussed in Section 3.10.3.2 of the Draft EIR, the effect of surrounding topography and vegetation to attenuate noise from the landfill would decrease over time as the height of the landfill increases. As the landfill approaches its proposed capacity, noise levels would increase to the levels shown in Table 3.10.6 of the Draft EIR.
2. The evaluation of noise impacts and definition of significance thresholds in Sections 3.10.1 and 3.10.3 Draft EIR were based on County noise standards as provided in the County General Plan. The standards do not specifically distinguish between noise as a nuisance and as a hazard. As discussed in the Noise Element of the General Plan, however, the County General Plan noise standards incorporate both state and federal noise guidelines which consider both health risks and land use compatibility.

Response 11-12

1. Sections 3.11.2.5. and 3.11.3.1.3 of the Draft EIR, respectively, address traffic safety considerations and potential traffic safety impacts of the proposed project. Inherently, traffic safety issues also constitute "health and safety" concerns. The assessment of traffic safety impacts could be included in either the traffic or health and safety section of the Draft EIR, however, for organizational purposes it was included in the traffic section of the Draft EIR (Section 3.11).

Response 11-13

1. The assessment of highway safety and design for the proposed project was prepared by a licensed traffic engineer (WPA, 1995) and in accordance with the County's "Guidelines for Preparation of Environmental Assessment for Public Highway Safety and Design" (County, 1992). The potential impacts associated with operations of the Toland Road/Highway 126 intersection, including highway safety and design issues associated with the eastbound, left-turn movements at this intersection, were evaluated in the traffic study prepared for the proposed

project. The findings of the traffic study are incorporated into Section 3.11 of the Draft EIR, and are the basis for the mitigation measures included in Section 3.11.7 of the Draft EIR. In addition, based on review of the project traffic study, Caltrans recommended specific traffic safety improvements to mitigate potential project impacts (see Comment Letter 02). These measures, including the installation of an intersection control flashing beacon at Toland Road/Highway 126, standard intersection lighting, and appropriate signage along Highway 126 are included as traffic mitigation measures in this Final EIR (See Table 1.1).

2. Excessive vehicle stacking in the Highway 126 eastbound left-turn pocket at Toland Road is not anticipated. As discussed in Section 3.11.3.1.2 of the Draft EIR, the existing 120-foot, left-turn pocket exceeds the minimum length required pursuant to the Caltrans Highway Design Manual (Caltrans, 1995). As explained below, based on the standard, the required left-turn pocket length would range between 65 feet and 85 feet.
3. The Caltrans design standard for left-turn vehicle storage is based on the number of turning vehicles likely to arrive in an average two minute period during the peak hour (Caltrans, 1995). If the number of trucks during the peak hour represent 10 percent or more of the traffic volume, left-turn vehicle storage space for a minimum of one passenger car and one truck should be provided. As shown in Table 3.11.2 of the Draft EIR, trucks average approximately 11.5 percent of the traffic at the Toland Road/Highway 126 intersection.
4. Based on the peak hour estimate for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The design standard for the left-turn vehicle storage length would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car). Under the "proposed case" and the use of transfer trucks, during the peak hour a waste truck would arrive at the intersection an average of once every 10 minutes. Based on the longer truck length for transfer vehicles, the required left-turn storage length for the "proposed case" would be 85 feet (60 feet per transfer truck and 25 feet for the passenger car).
5. This comment identifies specific areas of concern related to the potential impact of vehicles waiting to make left turns onto Toland Road. Following is a discussion of each of these potential safety hazards:
 - Vehicle blocking of eastbound Highway 126 fast lane due to stacked vehicles waiting to make left-turn onto Toland Road. As discussed above, the left-turn pocket provides adequate storage for existing and project-related traffic.

- Limiting ingress, egress and site visibility of vehicles associated with the Santa Clara School. The easternmost ingress/egress to the school is located approximately 300 feet west of the Toland Road/Highway 126 intersection. This is well beyond the end of the left-turn pocket for turns onto Toland Road. Since the length of the left-turn pocket would accommodate the project-related traffic, vehicle stacking would not extend far enough westerly to affect either west bound left turns into the school or eastbound traffic existing the school.
 - Blocking or partially blocking the Highway 126 fast eastbound lane, turning Highway 126 into one eastbound lane in the area. As discussed above, since the length of the left-turn pocket is adequate for project-related traffic, substantial vehicle stacking would not occur. Through traffic in the eastbound fast lane in the project area would not be affected.
 - Movement of slow, heavy trash vehicles transitioning from the outside (slower) eastbound Highway 126 lane into the faster moving inside lane, potentially affecting vehicles traveling in the fast lane. The existing 120-foot left-turn pocket and configuration at the Toland Road/Highway 126 intersection and approach lanes, as shown in Figure 3.11.3 of the Draft EIR, provide waste trucks adequate distance to safely approach the intersection. The implementation of safety measures as recommended by Caltrans, including the installation of "SLOW TRUCKS" signage and the intersection control flashing beacon (for each through lane), would further mitigate the potential for this safety hazard.
 - Potential for movement of slower, loaded trash vehicles to shunt faster vehicles into the slower outside lane right in front of Santa Clara School. As stated above, the configuration of the intersection provides adequate distance for vehicles to safely make the lane transition. The installation of safety-related improvements, including warning signage and the intersection control flashing beacon would reinforce cautionary driving in the vicinity of the school. The beacon would operate during school hours.
6. Neither Caltrans or the County Transportation Department identify hazardous conditions at the Toland Road/Highway 126 intersection. In addition, these agencies have concurred with the traffic study's conclusion that signal warrants at this intersection would not be met by the proposed project (see Comment Letters 02 and 13). The flashing beacon and warning signs, as recommended by Caltrans and included in the EIR as mitigation measures, would mitigate potential traffic-related safety issues at the intersection.
7. Notwithstanding Caltrans' determination that a signal is not required at the intersection of Toland Road and Highway 126, in the event at some time in the future Caltrans decides a signal is required, VRSD has agreed to pay the cost for the signal. While this is not a mitigation measure in terms of CEQA, VRSD would accept a condition to this effect in the CUP for the proposed project.

Response 11-14

1. In response to the comment from the County Agricultural Commissioner (see Comment Letter 06), VRSD has evaluated the use of the existing underpass located approximately one-half mile east of the Toland Road/Highway 126 intersection with Caltrans, the County Transportation Department, and the County Planning Division. The use of this underpass would eliminate the need for waste hauling trucks traveling from the west County to make a left turn from Highway 126 onto Toland Road. Based on a review of conditions and discussions with Caltrans, the County Transportation Department and the County Planning Division, the issues associated with the use of the underpass include:
 - Potential conflicts with through traffic on Highway 126 associated with waste truck deceleration and acceleration for exiting and merging on Highway 126.
 - Vertical clearance under Highway 126.
 - Structural condition of pavement to handle heavy loads.
 - Potential conflict with other users (if any) of the underpass.
 - Potential conflict with the intersection of Hall/Sycamore Road and Highway 126 as waste trucks merge onto Highway 126. The intersection of Hall/Sycamore Road is only approximately 175 feet from the underpass.

2. Based on the evaluation, it has been determined jointly by VRSD, Caltrans, the County Transportation Department, and the County Planning Division that the use of the underpass would not improve traffic conditions in comparison to waste trucks making left turns at the Toland Road/Highway 126 intersection (as mitigated). The traffic mitigation measures included in the EIR and concurred on by Caltrans and the County Transportation Department remain valid and constitute the proposed mitigations for the project.

Response 11-15

1. The potential for illegal dumping was addressed in Section 3.14.3.1.3 of the Draft EIR. Although illegal dumping is a concern in the vicinity of any landfill, it is expected to diminish under the proposed project due to an increase in the operating hours and daily capacity. The proposed schedule and daily capacity is expected to provide sufficient opportunity for private parties to utilize the landfill.

2. VRSD currently cleans up incidents of illegal dumping within the area of the landfill as part of a "good neighbor" policy. If the owner of the illegally dumped material can be identified, VRSD reports the person or persons to the County Environmental Health Division. In the event that hazardous waste is illegally dumped, VRSD implements one of the following procedures:
 - If the amount of material is small and mainly consists of household hazardous waste, VRSD picks up the material and sets it aside for collection by a licensed hauler for transport to an appropriately permitted facility.
 - Material other than small amounts of household hazardous waste reported in the vicinity of the site is to be reported to the County Environmental Health Division.

These procedures would continue under the proposed project.

3. Implementation of operational procedures and regulatory requirements, and mitigation measures included in Section 3.14 of the Draft EIR would reduce the potential for illegal dumping to below a level of significance. The additional mitigation measures for illegal dumping noted by this comment have been evaluated and it has been determined they are not required to assure the potential impacts from illegal dumping remain below a level of significance.

Response 11-16

1. It is unclear from this comment how the closing of Bailard would result in encouraging the movement of the gulls to Toland. The landfills are not in close proximity and operational experience at Bailard has shown that the gulls that frequent Bailard are using that site primarily as a loafing area. Assuming when Bailard closes that gulls no longer find it suitable as a loafing area, it is reasonable to expect the gulls would use the other numerous natural (e.g., beaches, lagoons, and estuaries) and man-made (e.g., agricultural fields, parks, and school grounds) areas that provide suitable loafing locations in the coastal strip of the County.
2. Toland does not currently attract birds and is not used as a loafing area by gulls. It is speculative as to whether gulls or other bird species would be attracted to Toland due to the proposed project. Similarly, it is speculative as to whether gulls would come in conflict with the Santa Paula Airport. Section 15145 of the CEQA Guidelines indicates that EIRs are not required to address issues that are speculative, therefore, the possibility that Toland may attract gulls or other bird species and the potential that gulls could come in conflict with the Santa Paula Airport is not specifically addressed in the EIR. As discussed in Section 3.14.3.1.1 of

the Draft EIR, however, Toland would be operated in compliance with CCR Title 14, including the following operational procedures (see Section 3.14.5 of the Draft EIR) that are known to be effective in minimizing birds at landfills:

- Compaction of waste at the active working face.
 - Periodic 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.
 - The working face would be kept as small as safely practicable, given the type of and number of landfill equipment working there.
 - An active litter control program.
3. As discussed in Section 3.14.3.1.1 of the Draft EIR, in the event birds are determined to be a nuisance at Toland additional measures would be implemented and may include, but not be limited to, the use of an overhead nylon line grid system (bird wires), distress tapes, propane cannons, and/or habitat manipulation/modification. The effectiveness of these measures would be monitored and, if found not to be effective, additional measures would be developed. To formalize this requirement, a mitigation measure has been included in this Final EIR regarding the use of additional measures in the event birds are determined to be a nuisance at Toland. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.
4. As part of the permitting process, VRSD will coordinate with the FAA regarding the Santa Paula Airport.

Response 11-17

1. Comment noted. VRSD will work directly with the County Planning Division to develop a mutually agreeable mechanism as part of the CUP to enforce the provision that Toland would only accept waste generated in the County or waste from transfer stations/materials recovery facilities located in the County.

Response 11-18

1. The No Project alternative in the Draft EIR does evaluate the environmental impacts which would be incurred "... without recourse to new or expanded in-county disposal capacity." As discussed in Section 4.8 of the Draft EIR, it was assumed that under the No Project

alternative, several existing landfills would accept a portion of the 1,500 tpd that would be disposed at Toland under the proposed project. Although not specifically referenced in the analysis, this would be the most likely scenario to occur under the Western Ventura County Joint Powers Authority's (JPA's) request for proposal (RFP) for waste disposal. Under this RFP, individual haulers would contract with jurisdictions to dispose municipal waste.

2. As discussed in Section 4.8 of the Draft EIR, because the Simi Valley and Chiquita Canyon landfills are the closest landfills to the service area, the analysis of waste diversion to these landfills represents the No Project alternative with the greatest potential to reduce environmental impacts. If waste was instead hauled to other, more distant landfills either by truck or rail-haul under the Western Ventura County JPA, environmental impacts (particularly traffic and air quality) would be greater than those analyzed in the Draft EIR for the No Project alternative. As concluded in Section 4.8.2.3 of the Draft EIR, the No Project alternative would not be environmentally superior to the proposed project.

Response 11-19

1. The Draft EIR does not dismiss the findings of the VRSD Study. The study and its relationship to the proposed project is discussed in both the land use and alternatives sections (Sections 3.8.1.6 and 3.8.3.1.5, and Section 4.5.3, respectively) of the Draft EIR. It is important to note two important factors relative to the analysis: (1) the project site as currently proposed was not evaluated in the VRSD Study; and (2) the defined project criteria for the 1991 VRSD Study vary from the current project objectives.
2. The O'Leary Canyon site evaluated in the VRSD Study encompasses the current project site. Section 4.5.3.3.10 describes the boundaries of the O'Leary Canyon site in comparison to the boundary of the proposed project site. Although the approximate 450-acre O'Leary Canyon site encompasses the proposed project site (213 acres), the O'Leary Canyon site was much larger and includes several natural resources and development constraints which do not occur within the Toland site. The VRSD Study ranking for the O'Leary Canyon site, therefore, is not directly applicable to the proposed project site.
3. One of the pass/fail criteria included in the VRSD Study was that potential sites must be a minimum of 400 acres to accommodate an estimated landfill capacity of 50 million cubic yards. The 213-acre Toland site would not pass the minimum acreage criteria of the previous

study. Moreover, the proposed project's design capacity of 30 million cubic yards, is based on more current projections of required capacity to serve VRSD's service area.

4. For comparison purposes, a ranking of the Toland site based on the VRSD Study criteria is included as Table 3.8.3 of the Draft EIR. For direct comparison to the previous analysis, the ranking excluded the site capacity ranking for each site. Based on the analysis, the proposed site at Toland would rank 5th out of the total 35 candidate sites.
5. The Draft EIR compared the four sites from the VRSD study that would rank above the Toland site, and provides the rationale for rejecting these sites in favor of the proposed project site. An overview of each of the VRSD Study sites, including the four sites ranking above Toland, is included in Section 4.5.3 and Table 4.7 of the Draft EIR. Three of the four sites ranking higher than Toland (Nos. 13, 14, and 15) are located proximate to Weldon Canyon and were reviewed in detail as alternatives in the EIR prepared for the formerly proposed Weldon Canyon Landfill (County, 1992). Based on the analysis in that EIR, two of these sites (Nos. 13 and 14, Ranking 2nd and 3rd, respectively) were determined to have "fatal flaws" for development of a landfill. Development of these sites would be inconsistent with General Plan policy 1.5.2.3 regarding riparian resources.
6. Site No. 15 (Rank 1st) in the VRSD study would require substantial transportation improvements, including the construction of a new bridge, and would result in significant traffic and noise impacts along Canada Larga Road without expensive road realignment. Aliso Canyon (Site No. 11, Rank 4th) would also require substantial transportation improvements. Neither of these sites were determined to have the potential to reduce or eliminate significant impacts relative to the proposed project.
7. In addition to evaluating the potential for each alternative to reduce or eliminate significant impacts, in accordance with CEQA Guidelines, Section 4.3.5 and Table 4.4 summarize the ability of each of the alternative sites to meet the current project objectives. As concluded in Section 4.5.4 of the Draft EIR, none of the offsite alternatives, including the four sites ranking higher than Toland in the VRSD Study, would provide the opportunity to eliminate significant impacts or reduce overall environmental impacts compared to the proposed project, or to attain critical project objectives.

Response 11-20

1. The proposed project consists of both a vertical and lateral expansion of Toland. The vertical expansion component of the proposed project includes the placement of additional waste on top of waste already landfilled at the site. Vertical expansions of existing landfills are allowed by state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) without a requirement to excavate previously landfilled waste to allow the installation of a composite liner system. Lateral expansions of existing landfills are required by state and federal regulations to include a composite liner system. Therefore, based on state and federal landfill regulations, the proposed project includes a composite liner for the lateral expansion component of the project.
2. As discussed in Section 2.5.1 of the Draft EIR, for the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot thick low permeability intermediate soil barrier would be installed. A recent geotechnical investigation at the site confirmed that sufficient quantities and qualities of low permeability soil (1×10^{-6} cm/sec) are available onsite to construct the intermediate soil barrier (Environmental Solutions, Inc., 1996). Incorporated with the intermediate soil barrier is a landfill gas collection system, and leachate collection and removal system. The design of the intermediate soil barrier system shall take into account the overburden weight of the new waste and shall account for any settlement that may occur.
3. The intermediate soil barrier to isolate the existing waste from the new waste is not required by state or federal landfill regulations for vertical expansions, however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.
4. In addition, as discussed in Section 3.3 of the Draft EIR, based on the geologic and hydrogeologic conditions at Toland, and the landfill regulatory requirements included in CCR Titles 14 and 23, and Subtitle D (e.g., composite liner system, landfill gas collection system, leachate collection and removal system, etc.) the proposed project would not impact ground water quality.
5. Compared to the proposed project, development of a new landfill at a currently undisturbed location would allow the installation of a composite liner in accordance with CCR Title 23 to minimize the potential for water quality impacts. Development, would however, introduce the

potential for water quality degradation for both surface water and ground water resources to a new site. Since, as discussed above, the proposed project would not have a significant impact on ground water quality, development of a landfill at an offsite location is unlikely to reduce potential environmental impacts to this resource compared to the proposed project.

Response 11-21

1. Table 6.1 in the Draft EIR included a list of the various technical reports utilized to address potential impacts of the proposed project. The documents requested by the comment have been provided, as appropriate, to responsible agencies along with the EIR. As stated in the Draft EIR, these reports are also available for public review at VRSD. The technical reports, along with the Draft and Final EIR will be part of the administrative record considered by the VRSD Board of Directors, as the lead agency for CEQA.
2. By making copies of the technical reports available to the responsible agencies and for public review at VRSD, these reports are considered to be available for public review (PRC Section 21061), and are considered to be part of the CEQA administrative record for the project. Information that is available for public review is not required by CEQA to be repeated in its entirety in an EIR (PRC Section 21061). Including the findings of the various technical reports in the EIR, and making these reports available to the appropriate responsible agencies and the public for review meets the intent of CEQA. It also balances the need to provide information on impacts of the proposed project in a concise document with the potential cost of reproducing and distributing thousands of pages, which only a limited number of commenters may wish to review. The technical reports consist of over 430 pages (approximately half the size of the Draft EIR).
3. Based on the above, there is no need or requirement to include the technical reports referenced by this comment as appendices to the EIR.

Response 11-22

1. Paleontological resources were addressed in Section 3.7 of the Draft EIR.

Response 11-23

1. As discussed in Section 3.6.3.1.3 of the Draft EIR, the cement foundation did not include associated artifacts and is located in an area where land altering activities would not occur as part of the proposed project. As the foundation would not be affected by the proposed project, it was determined that additional research into the historic contexts of the foundation was not warranted.

Response 11-24

1. After Section 3.6 of the Draft EIR was prepared, a state trinomial number was assigned to the rockshelter. In the Draft EIR, the rockshelter is designated by the temporary field number of KB-4. The state assigned trinomial number for the rockshelter is CA-Ven-1237.

Response 11-25

1. Section 3.6.4 of the Draft EIR does not indicate that preservation of a cultural site is a cumulative impact. Rather, this section indicates that in-situ preservation is the preferred manner to avoid affecting a cultural resource. In-situ preservation of CA-Ven-1237 would occur as part of the proposed project through avoidance of the site. It is on this basis that the Draft EIR is able to find that the proposed project would not contribute to the cumulative impact of cultural resources in the project area.
2. Regarding the potential that increased access to the project site may lead to impacts to CA-Ven-1237 (e.g., vandalism, erosion), CA-Ven-1237 is separated from the remainder of the site by distance, steep topographic features, and thick underbrush that will act as a deterrent to discourage site personnel and the public from attempting to reach the site. In addition, the location of CA-Ven-1237 has not and will not be made public information.
3. Regarding the potential for direct or indirect impacts to CA-Ven-1237 from construction or operation of the landfill (e.g., erosion, brush clearing), again CA-Ven-1237 is separated from the remainder of the site by distance and steep topographic features. No construction or operation activities would occur that could result in erosion of the site or that would require brush clearing in the area of the site.

Response 11-26

1. In the future, we recommend that if the consultant would like to review project development maps as part of the review process that this information be passed onto their County point-of-contact who could have requested the maps from VRSD. If such a request had been made, VRSD would have provided the requested project maps to assist the consultant in its review, and still would be pleased to provide the maps at this time.

Response 11-27

1. See Response 11-23 above.

Response 11-28

1. See Response 11-23 above. The statement in the technical report which indicated that the foundation is not "dated to the historic period" relates to the contemporary origin of the foundation.
2. As suggested by this comment, a mitigation measure has been included in the Final EIR that should future operations or construction design changes be planned that have the potential to affect the cement foundation, additional research shall be implemented to determine if the foundation is potentially a significant cultural resource. If the foundation is determined to be a significant cultural resource and it would be affected, an appropriate data recovery program shall be implemented. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 11-29

1. The correct references for the cultural resources technical report prepared to support the Draft EIR (Environmental Solutions, Inc., 1995c) are as follows:
 - Grant, Campbell
1978 Introduction, Chumash - *IN Handbook of North American Indians, Volume 8: California*, Edited by R.F. Neizer, pp. 505 - 508. Smithsonian Institute, Washington, D.C.
 - Toulouse, Julian Harrison
1971 *Bottle Makers and Their Marks*. Thomas Nelson, Inc. New York, Camden.

These corrections do not alter the findings or conclusions of the EIR.

Response 11-30

1. The comment is correct in noting that the presence of scalebroom (*Lepidospartum squamatum*) was observed in the southern portion of the site and O'Leary Creek terraces (see Section 3.4.2.1.1 of the Draft EIR). It is recognized that scalebroom is a distinctive native plant community (Magney, 1993). These areas of the site, however, would not be disturbed under the proposed project. Therefore, no significant impacts to this plant community would occur as a result of the proposed project and no additional surveys are required.

Response 11-31

1. It is recognized that although coastal sage scrub is not listed as a sensitive plant community, this plant community is considered by some experts to be "at risk," because it may contain many sensitive plant and animal species, and is fragmented throughout southern California (Davis, et al., 1995).
2. As stated in Section 3.4.3.1 of the Draft EIR, the expansion of the landfill beyond its currently permitted limits would impact a small amount (approximately 2.7 acres) of coastal sage scrub. Estimated impacts to native plant communities under the proposed project would be less than 3 percent of the total current indigenous habitat onsite. There is also considerable coastal sage scrub adjacent to the project site and in the project area.
3. As stated in Section 3.4.3 of the Draft EIR, Appendix G of the CEQA Guidelines indicates that a proposed project could be considered to have a significant impact on plant species if it could:
 - Substantially affect a threatened or endangered species or its habitat.
 - Substantially diminish habitat for plant species.

As coastal sage scrub is not listed as threatened or endangered, and the proposed project would not "substantially" diminish habitat, based on the criteria above, the proposed project would not result in significant impacts to this plant community.

Response 11-32

1. It is agreed that the CEQA Guidelines and the Federal and California Endangered Species Acts do not distinguish between nonvascular and vascular plants. A biological survey was completed according to accepted standards by qualified personnel to determine the extent of the major plant communities onsite and the potential occurrence of sensitive plant species.

2. It is recognized that suitable substrate for nonvascular plants occurs within the proposed site. Specifically, exposed bedrock and other suitable substrates occur along the eastern and western boundaries of the site.
3. Only two sensitive plant species, as included in the California Natural Diversity Database (CDFG, 1995), have the potential to occur in the project area, as listed in Table 3.4.2 of the Draft EIR. Neither of these species were observed onsite (Hunt, 1995). Based on the criteria listed in the CEQA Guidelines (see Response 11-31, above), significant impacts would not occur as a result of the proposed project.

Response 11-33

1. It is agreed that the CEQA Guidelines and the Federal and California Endangered Species Acts do not distinguish between invertebrates and larger forms of wildlife species. In accordance with Appendix G of the CEQA Guidelines, a proposed project could be considered to have a significant impact on wildlife species if it could:
 - Substantially affect a threatened or endangered species or its habitat.
 - Substantially diminish habitat for wildlife.
 - Create a potential hazard to wildlife populations in the area through the use or disposal of materials.
 - Substantially interfere with the movement of resident or migratory fish or wildlife species.

A biological survey was completed according to accepted standards by qualified personnel to determine the extent of the wildlife community onsite and the potential occurrence of sensitive wildlife species. Evidence of only two sensitive wildlife species, as included in the California Natural Diversity Database (CDFG, 1995), were observed (Cooper's hawk and desert woodrat) during the survey. Based on the criteria listed in the CEQA Guidelines, no significant impacts to wildlife species would occur (see Section 3.4.3.1 of the Draft EIR). No additional surveys are required.

Response 11-34

1. As discussed in Section 3.4 of the Draft EIR, only a small amount of potential habitat is available onsite for the Los Angeles pocket mouse (*Perognathus longimembrus brevinasus*) and it was not observed during the biological survey. Should the species occur onsite, the primary suitable habitat would be coastal sage scrub and ruderal grasslands. As discussed in Section 3.4.3.1.3 of the Draft EIR, the proposed project results in disturbances of only a

limited number of acres of coastal sage scrub and there is considerable coastal sage scrub in the vicinity of the property site. This species is not listed as threatened or endangered by the U.S. Fish and Wildlife Service and CDFG.

2. As discussed in Section 3.4.3.1.3 of the Draft EIR, the proposed project would disturb only 2.7 acres of the coastal sage scrub community that provides potential habitat for the desert woodrat (*Neotoma lepida*). Should the species occur onsite, the primary suitable habitat would be coastal sage scrub and ruderal grasslands. As discussed in Section 3.4.3.1.3 of the Draft EIR, the proposed project results in disturbances of only a limited number of acres of coastal sage scrub and there is considerable coastal sage scrub in the vicinity of the property site. This species is not listed as threatened or endangered, and is widely distributed along the slopes of southern California.
3. It is noted that two subspecies comprise this species in the region and in addition to the San Diego horned lizard (*Phrynosoma coronatum blainvillei*), the California horned lizard (*Phrynosoma coronatum frontale*) may also potentially occur onsite. While neither species was observed during the biological survey, there is suitable habitat scattered onsite with the greatest potential for occurrence of these species on the sandy stream terraces and sandy active channel of O'Leary Creek, as well as the interface between ruderal grassland and coastal sage scrub.
4. As discussed in Section 3.4.3.1.3 of the Draft EIR, should these species occur onsite, the primary suitable habitat is along O'Leary Creek, which would not be affected by the proposed project. In addition, the proposed project results in disturbance of only a limited number of acres, and there is a considerable suitable habitat adjacent to the project site.
5. As stated in Section 3.4.3 of the Draft EIR, Appendix G of the CEQA Guidelines indicates that impacts to wildlife could be considered significant if they could:
 - Substantially affect a threatened or endangered species or its habitat.
 - Substantially diminish habitat for wildlife.
 - Create a potential hazard to wildlife populations in the area through the use or disposal of materials.
 - Substantially interfere with the movement of resident or migratory fish or wildlife species.

As the above species are not listed as threatened or endangered, and as the proposed project would not "substantially" diminish habitat suitable for the species, based on the criteria above, the proposed project would not result in significant impacts to these species.

Response 11-35

1. It is recognized that there is a considerable amount of non-native vegetation onsite and in the vicinity of the site. Most of the project site has been disturbed by human factors. The site property outside the active landfill is comprised of naturally disturbed areas, non-native grasslands, and dense strands of coastal sage scrub vegetation. Given the amount of non-native vegetation it would not be necessary to implement measures to eradicate and control invasive exotic plants on the less than 3 acres of undisturbed habitat that would be disturbed under the proposed project. The disturbance and potential introduction of non-native species to less than 3 acres under the proposed project is not considered significant.

Response 11-36

1. As stated in Response 11-35, the disturbance and potential introduction of non-native species to less than 3 acres is not considered significant. Landscaping/revegetation plans would be developed during the permitting and design phase of the proposed project. The landscaping/revegetation plans would detail the specific plant species to be used for revegetation.

Response 11-37

1. As stated in Section 3.3.3.1.1 of the Draft EIR, large quantities of leachate are not anticipated from the proposed project due to the semiarid conditions of the site, and the requirements for application of daily cover. As discussed in Section 2.4 of the Draft EIR, the limited amount of leachate that may be generated would be controlled by a composite liner and a leachate collection and removal system. As discussed in Section 3.3.5 of the Draft EIR, a ground water monitoring system would be developed for the proposed project in accordance with CCR Title 23, Chapter 15, Article 5. These components of the proposed project are the same as the measures included in the biological report (Hunt, 1995).
2. In addition, to prevent significant impacts with regard to stormwater runoff, appropriate stormwater drainage systems, including a detention basin would be constructed as part of the proposed project. The stormwater drainage systems would be required in accordance with CCR Titles 14 and 23, and the Federal Clean Water Act as implemented by the NPDES

permit process for point source discharge of stormwater. This would allow the release rate of stormwater to be controlled, so as to not impact riparian and wetland habitats in O'Leary Canyon.

3. With implementation of the above operational procedures and regulatory requirements, potential impacts to riparian and wetland habitats is not considered significant.

Response 11-38

1. The significance of cumulative impacts was determined based on the criteria listed in Appendix G of the CEQA Guidelines (see Responses 11-31 and 11-33, above).
The proposed project would disturb less than 3 acres of natural undisturbed habitat and another 17 acres of previously disturbed or barren land. Impacts would be mitigated to the extent that the entire landfill would not be disturbed at the same time, but rather in phases over its approximate 31-year operational life. In addition, over the long-term, the phased development and revegetation plan, and proposed mitigation measures would result in no net loss of habitat. Therefore, disturbance is considered to be short-term and mitigable.

Response 11-39

1. The corrections to the scientific nomenclature and common names used in the Draft EIR are noted.

COUNTY OF VENTURA
RESOURCE MANAGEMENT AGENCY
PLANNING DIVISION

October 31, 1995

TO: Lynne Kade, Project Manager
Toland Landfill Expansion

FROM: Bruce Smith, Manager
General Plan Section

RE: Draft Environmental Impact Report -
Toland Landfill Expansion
Applicant: Ventura Regional Sanitation District

We have reviewed the above-referenced document and offer the following comments:

Biological Resources

The DEIR indicates that at least one of the seeps on the west of the proposed project will be impacted (Figure 3.4.1 appears to indicate that two seeps would be impacted by the project) and that this will be a significant impact to biological resources. The document further states that O'Leary Creek drainage appears to be a locally important wildlife corridor. The analysis concludes, however, that the proposed project will pose no significant impact to biological resources. Curiously, mitigation measures are offered for implementation. The conclusion of "no significant impact" is unsupported by analysis in the DEIR and, in fact, is contradicted in the discussion.

In addition, no analysis is included regarding consistency with General Plan Policy 1.5.2-3 or -4 for protection of wetlands, in fact, no discussion of "wetlands" is included in the analysis, even though the document reports that "running water" was discovered at one of the seeps during the biological survey (p. 3.4-9), and O'Leary Creek is described as "permanent water" (p. 3.6-6).

Because of the inadequate or contradictory analysis provided in the DEIR, we must conclude that the project may be inconsistent with the County's General Plan policies for Biological Resources.

General Plan Land Use

The General Plan land use designation on the site of the proposed project is "Open Space" and the zoning on the site is "O-S" ("Open Space 160- and 40-acre minimum). The Public Facilities Map of the County General Plan designates the site as a "Solid Waste Disposal Facility."

County Planning records indicate an existing Conditional Use Permit (CUP-2271, Arid Oil Company) within the proposed expanded boundary of the proposed project. Information was not available at the time these comments were prepared to determine whether the permitted well(s) are actually in operation. The DEIR does not include an analysis of the impact of the well(s) on the existing environment (noise, air quality, etc.) or the impacts of the proposed project on the oil operations. USGS maps located in the County Planning Division indicate that an oil pipeline (Arco) is located on the northeast boundary of the expanded site, and as gas and water pipelines were acknowledged to be present on or near this proposed site (Landfill Siting Study, Appendix "D", Ventura Regional Sanitation District, July 1991 - Site 35, O'Leary Canyon).

Noise Hazards

The DEIR acknowledges that project-specific traffic noise impacts would exceed the County standard in two residences along Toland Road and proposes mitigation measures in the form of noise barriers along this roadway to reduce the noise level to a less-than-significant level. The document also states that the project-specific increase in noise levels west of Highway 126 (at 1 dBA) will not exceed County General Plan standards of an increase of 3 dBA, presumably because the ambient noise level at, for instance, Santa Clara School, is so much higher than at Toland Road.

In the discussion of cumulative impacts, however, the DEIR, having acknowledged that current noise levels along Highway 126 already exceed the 60 CHNL County standard, indicates that the proposed project would contribute, to that already-excessive level, approximately 2.3 percent of the future ADPs on Highway 126.

Where existing noise levels exceed the minimum standard, any increase in the cumulative noise level is considered to contribute to a significant cumulative impact. The required findings for a "Statement of Overriding Considerations" include a statement that all feasible mitigation measures have been applied to the project, but that the residual effects cannot be mitigated to a less-than-significant level.

The DEIR has not identified any mitigation measures for cumulative noise impacts along Highway 126 (and in fact specifically excludes mitigation in the form of noise barriers at Santa Clara School) and, therefore, offers no justification for a determination that one or more mitigation measures are infeasible.

Health and Safety

The DEIR indicates (Sec. 3.15.3.1.1) that fire hazards are considered unlikely either as originating from the site and moving to the surrounding hillsides, or originating offsite and migrating to the site. The USGS maps available in the County Planning

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Division, however, indicate that the site is located in a High Fire **(4)** Hazard Zone. cont.

If you have questions concerning this memorandum, please contact Kelly Scoles at ext. 5042.

DOCUMENT 12
VENTURA COUNTY PLANNING DIVISION
GENERAL PLAN SECTION
RESPONSE TO COMMENTS

Response 12-1

1. As discussed in Section 3.4.3.1.5 of the Draft EIR, the riparian vegetation associated with one of the four onsite seeps extends approximately 10 feet into the limits of disturbance of the proposed project. This section also concludes that if this resource were to be disturbed, the impact would be considered significant. To mitigate this significant impact, a mitigation measure was included in Section 3.4.7.1 of the Draft EIR to modify the limits of the proposed project to provide a minimal 50-foot setback from the riparian vegetation associated with this seep. As concluded in Section 3.4.8 of the Draft EIR, this mitigation measure would avoid impacts to the seep and associated riparian habitat.
2. Regarding the second seep that is in close proximity to the limits of disturbance of the proposed project (see Figure 3.4.1), the detailed biological survey conducted for the proposed project determined that this seep and its associated vegetation would not be impacted by the proposed project (Hunt, 1995). While the symbol used to depict seeps in Figure 3.4.1 of the Draft EIR indicates that this seep also extends into the limits of disturbance, this is due to the scale of the figure and the size of the symbol used to depict the seep. The size of the symbol overstates the size of the seep and its associated vegetation. In response to another comment, the seeps have been placed on a topographic map to clarify their location (see Figure C.1 in Appendix C of this Final EIR).
3. This comment also expressed a concern regarding potential impacts to O'Leary Creek and its associated wildlife corridor. As shown in Figure 3.4.1 of the Draft EIR, at its closest point, this drainage is located more than 1,000 feet from the limits of disturbance of the proposed landfill footprint. Section 3.4.3.1.4 of the Draft EIR discussed the potential impacts on wildlife using this corridor. Based on the distance of this corridor from landfill activities, and the current level of landfill operations to which wildlife has adjusted, the proposed project would not result in a significant impact to wildlife movement.
4. Sections 3.8.1.1.1 and 3.8.3.1.1 of the Draft EIR discussed the relationship of the County General Plan's Goals, Policies and Programs to the proposed project and reviewed policies specifically related to solid waste facilities. Typically, a review of the proposed project for

consistency with the General Plan is conducted by the County in conjunction with processing the CUP. Within the EIR, policies related to resources (including biological resources), hazards, land use, and public facilities are analyzed in the respective impact and mitigation sections for each topical area.

5. With implementation of the mitigation measure included in the EIR, the proposed project would avoid impacts to riparian vegetation. Neither the seeps proximate to the limits of disturbance nor O'Leary Creek, an offsite wetland, would be impacted by the project. As discussed in Section 3.4.8 of the Draft EIR, it has been concluded that the proposed project would not result in a significant impact to these resources. Based on this finding, it is reasonable to conclude that the project would be consistent with the County General Plan wetland policies referenced in this comment.

Response 12-2

1. The General Plan designations and zoning for the site, as noted in this comment, are referenced in Section 3.8.1.1.2 of the Draft EIR.
2. CUP 2271 was an oil and gas development permit issued by the County to Arid Oil Company. In accordance with the permit, the CUP expired upon Arid's abandonment of the oil wells (Kada, 1995). Based on discussions with the County Planning Division, as the CUP has expired and the oil wells have been abandoned, the County has determined that these land uses would not represent a compatibility issue with the proposed project (Kada, 1995).
3. The comment is correct in noting that an oil pipeline crosses the northeastern boundary of the project site. The approximate 6-inch diameter pipeline referenced in this comment is an active ARCO crude oil line. The pipeline crosses the uppermost, northeastern corner of the Toland property boundary. It is not located within the proposed landfill footprint or grading area for the proposed project. VRSD has consulted with ARCO personnel to confirm the status of the pipeline and to assure that necessary safety precautions are implemented (Cragin, 1995). ARCO has agreed to inspect the line (e.g., for potential exposure), post new signage, and mark the pipeline easement with a fence or other improvement. There are no other gas or water pipelines traversing the project site.

Response 12-3

1. Section 3.10.6 of the Draft EIR indicated that the existing and future nonproject traffic-related cumulative noise conditions along Highway 126 in the project vicinity constitute a significant impact. The project-related traffic volume would, however, result in only an incremental increase to noise levels at the Santa Clara School when compared to the existing and future nonproject traffic-related cumulative noise levels, as discussed in Section 3.10.6 of the Draft EIR. Based on this finding, Section 3.10.8 of the Draft EIR specifies that a statement of overriding considerations for the cumulative nonproject traffic-related noise impact will be required.
2. Section 3.10.4 of the Draft EIR identified the proposed project's contribution to the traffic-related cumulative noise impact as a maximum increase of 0.6 dBA under the "worse case" traffic scenario for 2015. Moreover, the noise impact due to nonproject-related cumulative traffic on Highway 126 extends beyond the vicinity of Toland Road. Noise conditions along Highway 126 represent a regional issue and are not the responsibility of VRSD. Mitigation measures for the nonproject-related cumulative noise impacts were, therefore, not proposed as part of the proposed project.
3. Public Resource Code Section 21081 (Findings) and CEQA Guidelines Section 15091 outline the possible findings that the lead agency may make in approving a project for which one or more significant environmental effects have been identified. In addition to the finding paraphrased in this comment, other possible findings include:
 - Changes or alterations have been required in or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
 - Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by another agency or can and should be adopted by another agency.
 - Specific economic, social, or other considerations make infeasible the mitigation measure or project alternatives identified in the final EIR.
4. As noted in this comment, mitigation of the cumulative noise impact from the nonproject-related traffic volumes on Highway 126 could include the construction of a sound wall along portions of the highway. This measure, if within the right-of-way of Highway 126, would require review and approval by Caltrans. Proportionate (i.e., "fair share") funding of a sound wall could be considered by the County or Caltrans for individual projects which contribute to traffic on Highway 126. As specified in the possible findings, these considerations for the

proposed project may involve another public agency and unique economic considerations. It is the County's responsibility to determine appropriate project conditions and suitable findings in relation to the CUP for the proposed project.

4. While the County must determine appropriate project conditions and consider surrounding land use compatibility when making required County Zoning Ordinance findings, it is important to note that County Zoning Ordinance findings are based on project specific impacts only and are not based on cumulative impacts. The following County General Plan noise standard applies to the proposed project:
 - 1-hour Leq of 55 dBA, or ambient noise level plus 3 dBA (whichever is greater) during any hour between 6:00 a.m. and 7:00 p.m.
5. As long as the project specific noise impacts do not result in an increase in excess of 3 dBA, the project meets the County General Plan standards and a consistency finding, as required by the County Zoning Ordinance, can be made. The proposed project's contribution to the traffic-related cumulative noise level at the Santa Clara School would be a maximum of 0.6 dBA under the "worse case" traffic scenario for 2015. Therefore, the proposed project does not exceed the applicable County General Plan noise standard and a consistency finding can be made under the County Zoning Ordinance.

Response 12-4

1. As discussed in Section 3.15.2.1 of the Draft EIR, Toland is located in an area that is rated "H" (high fire area). It is possible that fires originating in the vicinity of the landfill could move onto the site; however, this is considered remote as the landfill is barren, uncovered waste during operations is minimal as the working face would be kept small, and there would be no exposed waste at the end of the day that could catch fire (see Section 3.15.3.1.1 of the Draft EIR). Therefore, the Draft EIR concludes that no significant impacts from surface fires are expected.



COUNTY OF VENTURA
PUBLIC WORKS AGENCY

WATER RESOURCES AND DEVELOPMENT DEPARTMENT
DEVELOPMENT & INSPECTION SERVICES DIVISION

MEMORANDUM

DATE: October 12, 1985
TO: RMA - Planning Division
ATTN: Lynne Kedia
FROM: Rich Guske

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT RESPONSES
PROJECT NO.: EIR CUP 3141 MD 3 TOLAND ROAD LANDFILL EXPANSION
PERMITTEE: VENTURA REGIONAL COUNTY SANITATION DISTRICT

Please find attached the responses from the Public Works Agency responding Departments & Divisions. I will forward the Water Resources Department & the Flood Control District responses to you next week.

If you have any questions relating to the subject matter, please feel free to contact Rich Guske, at extension 2042.



COUNTY OF VENTURA
PUBLIC WORKS AGENCY

WATER RESOURCES AND DEVELOPMENT DEPARTMENT
DEVELOPMENT & INSPECTION SERVICES DIVISION

MEMORANDUM

DATE: October 9, 1995

TO: Rich Guske
FROM: Jim Myers

SUBJECT: COP 3141 MD 3, Toland Road Landfill Expansion

I have reviewed the draft E.I.R. for the subject project. The following issues need to be addressed:

1. The drainage study is unsigned. It is required that the drainage calcs be signed and stamped by a registered civil engineer. (1)
2. Plans and public comments indicate that the landfill may be close to or encroach into adjacent property. Verify minimum setbacks are maintained. (2)

If you have any questions relating to the subject matter, please contact me, at extension 2324.



**PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic and Planning & Administration**

M E M O R A N D U M

November 6, 1995

13

TO: Development Services and Inspection
Rich Guske

FROM: Robert B. Brownie, Principal Engineer *RB*

SUBJECT: Review of the Draft Environmental Impact Report
Ventura Regional Sanitation District (VRSD)
Toland Road Landfill Expansion
Conditional Use Permit 3141, Modification Number 3
Unincorporated Area of SANTA PAULA and FILLMORE (SSP)

The Transportation Department previously reviewed the subject Draft Environmental Impact Report for the Toland Road Landfill Expansion and provided comments in our August 29, 1995, memorandum. Comments in our previous memorandum are still valid with the following exceptions:

1. Our previous Comment No. 2 required the project to pay the County's Traffic Impact Mitigation Fee per Ordinance 4071. Although County Counsel now advises that public entities, such as the VRSD, are exempt from this fee, a payment equivalent to this fee would be required to mitigate the cumulative traffic impacts of this project.
2. The DEIR has not addressed our previous Comment No. 3 regarding impact of project traffic on the longevity of Toland Road pavement life. In the interest of keeping the project on track, we have calculated the impact of project traffic and the associated extraordinary cost incurred by the County. Toland Road was constructed in 1970 to accommodate a Traffic Index of 7. New project truck traffic produces a Traffic Index of 10 exclusive of existing traffic on Toland Road. To achieve acceptable pavement life with the new project traffic, a 3 inch thick asphalt concrete overlay will be required. The applicant shall be conditioned to contribute \$142,520 for overlaying Toland Road.
3. Our review of this project is limited to the impacts this project may have on the County's Regional Road Network.

Please call me at extension 2080 with questions.

c: Richard Herrera
Duane Flaten

RB02/DRF:rbw31413.com

2.2-82

13

COUNTY OF VENTURA
PUBLIC WORKS AGENCY
DEVELOPMENT & INSPECTION SERVICES
800 South Victoria Avenue
Ventura, CA 93009
(805) 654-2034

DATE: September 28, 1995

TO: Rich Guske

FROM: RJR ENGINEERING GROUP/jot

SUBJECT: Geologic Review of CUP 3141, MOD 3

REFERENCE: CUP 3141 Toland Road Landfill

Ref: Environmental Solutions, Inc., September 1995, Draft Environmental Impact Report, Toland Road Landfill Expansion and Landfill Closure/Postclosure, prepared for Ventura Regional Sanitation District.

I have completed a review of the above referenced report, primarily Chapter 3. The following comment is provided at this time:

1. On page 3.2-32, under the heading 3.2.7 Mitigation Measures, it is recommended that a statement be included that an engineering geologist observe the excavations during grading in the area of the potential fault related features to assure the potential impacts remain below a level of significance.

END OF TEXT

3

4

5

COUNTY OF VENTURA
PUBLIC WORKS AGENCY
WATER RESOURCES AND DEVELOPMENT DEPARTMENT
WATER RESOURCES DIVISION

MEMORANDUM
October 12, 1995

To: Rich Guske
Development and Inspection Services Division

From: Lowell Preston, Ph.D. *[Signature]*
Manager

Subject: TOLAND ROAD LANDFILL PROPOSED EXPANSION PROJECT
APPLICATION (CUP 3141 MD3) STATUS

Groundwater concerns have been properly addressed as presented in the draft environmental impact report prepared for the subject expansion project, and have been commented upon in previous memoranda. The application is deemed complete, with respect to water resources and will be equal to or greater than the increased water use at the Toland Road Landfill. Although there will be an increased rate of water use with the proposed modification, the Fillmore Basin is not overdrafted. Underflow from the Fillmore and Santa Paula Groundwater Basins provide recharge to the overdrafted Oxnard Plain Groundwater Basin. Therefore, the increased water use impact is not mitigated unless the Bailard Landfill water use is reduced

6

No liquid wastes will be accepted at Toland. Therefore, the generation of leachate will be minimal. Adequate protection is being provided to prevent the migration of any leachate produced into usable groundwater supplies.

7

RLP:JT:LH/h

COUNTY OF VENTURA
PUBLIC WORKS AGENCY
FLOOD CONTROL DEPARTMENT
PLANNING & REGULATORY DIVISION
M E M O R A N D U M

October 16, 1995

TO: Rich Guske, Development Services

FROM: *[Signature]* Dolores Taylor, Division Engineer

SUBJECT: DRAFT EIR, TOLAND ROAD LANDFILL
CUP 3141, FLOOD ZONE 2

The subject document has been reviewed with respect to issues under the purview of the Ventura County Flood Control District (VCFCD). The subject document adequately addresses issues concerning hydrology, drainage, and surface water quality and quantity.

JGW:rb

8

DOCUMENT 13
COUNTY OF VENTURA PUBLIC WORKS AGENCY
RESPONSE TO COMMENTS

Response 13-1

1. The hydrology calculations included in Appendix C to the Draft EIR have been signed and stamped by a registered civil engineer as requested by this comment. See Appendix D of this Final EIR for the signed and stamped hydrology calculations.

Response 13-2

1. In accordance with the County requirements for setbacks on steep slopes, a mitigation measure has been included in the EIR that the minimum setback for the clean fill slopes of the proposed project shall be a minimum of 20 feet from the property line. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 13-3

1. While VRSD, as a public agency, is exempt from the County's Traffic Impact Mitigation Fee Ordinance 4071, it agrees to include a mitigation measure in the EIR to make a payment equivalent to the fee that would be required under the ordinance to mitigate the cumulative traffic impacts to the regional road network from the proposed project. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 13-4

1. VRSD agrees to include a mitigation measure in the EIR that requires the proposed project 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 proposed project. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 13-5

1. As requested by this comment, a mitigation measure has been included in the EIR that excavation for the landfill liner system 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. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 13-6

1. To demonstrate that the increased water usage for the proposed project would be offset by a reduction of water usage at VRSD's Bailard and Coastal landfills, the following revised mitigation measure is included in the EIR:

- To offset the increase in water usage at Toland from wells under the proposed expansion (a maximum of 30 acre-feet per year), water usage from wells at VRSD's Bailard and Coastal landfills shall be decreased in like amounts to the greatest feasible extent. To the extent the Bailard 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.

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.

This mitigation measure recognizes the requirement that the proposed project should not contribute to the current overdraft of the Oxnard Plain, and provides a feasible and effective mechanism to offset the water used by the proposed project. The revised mitigation measure is included in Table 1.1 of this Final EIR.

Response 13-7

1. No response is required.

Response 13-8

1. No response is required.

COUNTY OF VENTURA, Solid Waste Management Dept.**FAX Transmission**

From:	Christy Madden	Date:	Nov. 2, 1995
To:	Lynne Kada Planning Division	Time:	10:55 AM
		FAX #:	654-2509

Message:

The SWMD has reviewed the Draft Toland Road EIR and, for the most part, finds the document to adequately address issues surrounding findings of conformance with regional solid waste policy. There is one area, however, that we believe deserves clarification in the final document.

Pages 3.8-9 and 3.8-10 present a brief discussion of the Toland Road Landfill in the 1985 CoSWMP and it's relationship to conformance findings during the "Gap Period". While the DEIR correctly indicates that the CoWMP identifies Toland as a landfill site, that description includes the following information:

Toland Road is an existing 135 TPD disposal facility on 120 acres of leased property, serving Fillmore, Santa Paula and Piru, with 50 vehicular trips per day. Life expectancy for the Toland road site is estimated well beyond 100 years at the present waste generation rate...

It is questionable as to whether the project as proposed would be found to be identified and described in or found to conform with the county solid waste management plan as required under Public Resources Code Section 50000(a) during the Gap Period.

If you have any questions, please feel free to call.

VOICE: 805-854-2477 FAX: 805-648-9233

5275 COLT STREET, SUITE 1, VENTURA, CA 93003

**DOCUMENT 14
VENTURA COUNTY SOLID WASTE MANAGEMENT
DEPARTMENT
RESPONSE TO COMMENTS**

Response 14-1

1. In accordance with PRC 50000, the approval of the expansion of Toland prior to adoption of the CIWMP would require certification by the LEA that either:
 - The facility is identified and described in or found to conform with the CoSWMP; or
 - The facility has been approved by the County and by a majority of the cities within the County which contain a majority of the population of the incorporated area of the County.

2. PRC 50000 specifies that conformance with a CoSWMP is to be based on the procedures included in the CoSWMP. According to Ventura County's 1985 CoSWMP, conformance is interpreted to include (County, 1985):
 - Consistency with State Solid Waste Management policy.
 - Consistency with the goals and objectives of the CoSWMP.
 - Consistency with the facilities element of the CoSWMP.
 - Meeting local planning requirements (i.e., General Plan consistency, issuance of a CUP, and CEQA compliance).

3. It is agreed that the proposed project is not identified and described in the Ventura County 1985 CoSWMP; however, based on the conformance procedures included in the CoSWMP and the analysis included in the EIR for the proposed project, it appears that the proposed project is in conformance with the CoSWMP. If the LEA concurs with this assessment, it can make this certification under PRC 50000. If, however, the LEA determines the proposed project does not conform with the CoSWMP, then the procedures specified for the second method of certification prescribed by PRC 50000 would be followed in the event the CIWMP has not been adopted.

VENTURA COUNTY
TRANSPORTATION COMMISSION
950 County Square Drive, Suite 207
Ventura, CA 93003
(805) 654-2888
(805) 647-1591
FAX (805) 647-1860

RECEIVED

NOV 17 1995

V. R. S. D.

November 5, 1995

Mr. Ed McCombs, Interim General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, California 93003-5562

Subject: Toland Road Landfill Expansion and Landfill
Closure/Post Closure DEIR

Dear Mr. McCombs:

Thank you for the opportunity to comment on the Toland Road
Landfill Expansion and Landfill Closure/Post Closure Draft
Environmental Impact Report. We have completed our review of the
document and would like to submit the following comments and
concerns related to transportation issues:

Page Comment

3-11-3 The Transportation and Circulation section of the
DEIR identifies Toland Park as a nearby land use
but then fails to discuss what impact the proposed
project may have on Toland Park in terms of
project generated traffic. The DEIR must address
whether the proposed project will impact access to
the park or more likely, create a safety hazard
for park users?

3-11-14 Although the segment of Highway 126 at Toland Road
is currently below the state average for
accidents, it does not necessarily follow that the
accident rate will remain the same with the
addition of the project. The issue of safety
needs to be discussed in terms of the potential
for accidents with both the eastbound left turn
movement onto Toland Road and the southbound left
turn movement onto Highway 126. Further, this
analysis must be done for both a signalized and
unsignalized intersection.



Toland Road Landfill Expansion DEIR
November 5, 1995
Page 2

3.11-18

Table 3.11.6, Project Related Traffic "Proposed
Case" and "Worse Case" indicates that a worst case
scenario assumes 450 total vehicles per day would
be entering the proposed project. The same number
of vehicles is then used in calculating the Level
Of Service (LOS) for the Toland Road/Highway 126
intersection under the year 2015 scenario. The
DEIR identifies future background traffic growth
but does not discuss an increase in project
generated traffic due to increased refuse from the
County's increased population. Is this an
oversight or will daily refuse levels be limited?

Table 3.11.6, Project Related Traffic "Proposed
Case" and "Worse Case" also identifies water
trucks included in the mix of project generated
traffic. It would seem appropriate to supply
onsite watering facilities thereby reducing the
need for those project generated vehicles and any
delay in dust control.

3.11-31

The DEIR outlines mitigation measures including
signalization which would allow the intersection
to operate at an acceptable LOS but cannot commit
to any mitigation measures because the
intersection is ultimately within the jurisdiction
of Caltrans.

Without prior approval of these mitigation
measures readers of this document are forced to
assume a "worst case" scenario, that being, no
mitigation measures at all. The DEIR must address
this "worst case" scenario and discuss in full,
the impacts of this proposed project, such as the
vehicle stacking which will occur on Highway 126.
Without this information decision makers would be
unable to make an informed decision. In addition,
although it is possible to issue a statement of
overriding consideration for this project, we
strongly feel that the eastbound left turn onto
Toland Road would denigrate the safety on Highway
126 which the County and Caltrans have been
steadily working to improve.

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TRANSPORTATION COMMISSION
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NOV 17 1995

V. R. S. D.

November 5, 1995

Mr. Ed McCombs, Interim General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, California 93003-5562

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Closure/Post Closure DEIR

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whether the proposed project will impact access to
the park or more likely, create a safety hazard
for park users?

3-11-14 Although the segment of Highway 126 at Toland Road
is currently below the state average for
accidents, it does not necessarily follow that the
accident rate will remain the same with the
addition of the project. The issue of safety
needs to be discussed in terms of the potential
for accidents with both the eastbound left turn
movement onto Toland Road and the southbound left
turn movement onto Highway 126. Further, this
analysis must be done for both a signalized and
unsignalized intersection.



Toland Road Landfill Expansion DEIR
November 5, 1995
Page 3

Further, the addition of a traffic signal in an area that has historically been void of signals is unusual and could present other hazards which need to be fully discussed in the DEIR. This issue needs to be resolved prior to the Sanitation District taking final action on this project. 6

Given the safety related issues associated with proposed signalization, the DEIR should include an analysis of grade separated ramps for access to the proposed project. 7

The DEIR should also address Highway 126 safety concerns by limiting the proposed projects hours of operation to avoid peak period traffic or by limiting loads during peak periods. 8

In addition to the comments listed above, the DEIR fails to discuss whether the proposed project is subject to the County's Traffic Impact Mitigation Fee. 9

Again thank you for the opportunity to comment on the Toland Road Landfill Expansion and Landfill Closure/Post Closure Draft Environmental Impact Report. If you have any questions regarding the comments listed above please feel free to contact Steve DeGeorge of the VCTC our staff at 642-1591.

Sincerely,

Ginger Gherardi
Executive Director

DOCUMENT 15
VENTURA COUNTY TRANSPORTATION COMMISSION
RESPONSE TO COMMENTS

Response 15-1

1. The potential impacts of project-related traffic on Toland Park are discussed in Section 3.8.3.2 of the Draft EIR. The existing level of service (LOS) on Toland Road is LOS "A" and it would remain LOS "A" with the additional project-related traffic under either the "worse case" or "proposed case" scenarios as defined in the Draft EIR (WPA, 1995b). Access to the park from Toland Road would not appreciably change due to the limited number of additional trucks per hour associated with the proposed project. Project-related traffic is not anticipated to create a safety hazard for park users. In addition, any proposed increased use of the park would be subject to environmental review and implementation of traffic measures, if necessary, to mitigate potential traffic impacts.

Response 15-2

1. The accident data included in Section 3.11.2 of the Draft EIR was provided as baseline traffic information and was not meant to imply that the accident rate would remain constant under future conditions. Historical information, is however, relevant in assessing the potential for future accidents. The first step in highway accident prevention is to have accurate and detailed information of circumstances surrounding past accidents (Oglesby and Hicks, 1982). Section 3.11.3.1.3 of the Draft EIR provides the rationale to support the conclusion that the accident risk along Highway 126 is not anticipated to appreciably increase due to the proposed project.
2. The traffic study prepared for the proposed project employed the methodologies recommended by Caltrans for intersection capacity analysis, signal warrants, and highway design. These methodologies have been developed both to optimize traffic flow and assure traffic safety. In addition, as part of its review of the Draft EIR and the supporting traffic study for the proposed project, Caltrans independently performed the signal warrant analysis and concurred that signal warrants are not met for the Toland Road/Highway 126 intersection (see the Comment Letter 02). Based on this review, Caltrans recommended the installation of an intersection control flashing beacon, intersection lighting, and warning signs. These improvements are included in the EIR as mitigation measures and would mitigate potential traffic-related safety issues at the intersection.

3. An analysis of the Toland Road and Highway 126 intersection, including an evaluation of the eastbound left turn movement and the southbound left turn movement under signalized and unsignalized conditions, was accomplished as part of the traffic study for the proposed project. The results of this analysis were detailed in the Draft EIR (see Table 3.11.10 of the Draft EIR).

Response 15-3

1. As noted in the footnotes to Table 3.11.6 of the Draft EIR, the "worse case" traffic scenario is based on transporting 1,500 tpd of waste to the landfill via packer trucks and private vehicles. The 1,500 tpd of waste is the maximum daily capacity for the proposed project. The 1,500 tpd projection for waste, which would accommodate the proposed service area over the life of the project, is based on the estimates included in the Source Reduction and Recycling Elements (SRREs) for the cities served by VRSD. The projection takes into account population projections, waste generation, resource reduction, and recycling trends.

Response 15-4

1. As discussed in Section 3.3.3.1.2 of the Draft EIR, nonpotable water for the proposed project would be provided from one of three, or a combination of three identified sources. Using water from two of these sources, a new offsite water well near Toland Park, and/or a proposed new well on VRSD's 53-acre parcel, would not require water transport by truck. If available and feasible, these alternative sources would be preferred to importing water to the site by truck. If, however, it is necessary to transport water for nonpotable uses, a maximum of ten daily truck trips would be required to provide the nonpotable water required by the proposed project. As the use of trucks to import water to the site is the "worse case" in terms of traffic, this is the case addressed in the Draft EIR.

Response 15-5

1. Caltrans has recommended installation of an intersection control flashing beacon at Toland Road/Highway 126, standard intersection lighting, and appropriate signage along Highway 126 as mitigation for the proposed project. Since VRSD has agreed to implement these measures, the "worst case" scenario of "...no mitigation measures at all..." would not occur.

2. The intersection improvements as recommended by Caltrans and included in the EIR as mitigation measures would mitigate potential traffic-related safety issues at the intersection. The inclusion of these measures does not, however, alter the findings or conclusions of the Draft EIR regarding LOS. As discussed in Section 3.11.6 of the Draft EIR, without signalization, the southbound, left-turn movement from Toland Road to Highway 126 would continue to operate at an unacceptable level of service. Without signalization at the Toland Road/Highway 126 intersection, cumulative impacts would constitute a significant unavoidable adverse impact, and a statement of overriding considerations would be required.
3. Notwithstanding Caltrans' determination that a signal is not required at the intersection of Toland Road and Highway 126, in the event at some time in the future Caltrans decides a signal is required, VRSD has agreed to pay the cost for the signal. While this is not a mitigation measure in terms of CEQA, VRSD would accept a condition to this effect in the CUP for the proposed project.
4. This comment expressed a particular concern regarding the eastbound left turn onto Toland Road. As discussed in Section 3.11.3.1.1 of the Draft EIR, this movement currently operates at LOS "B" and would continue to operate at an acceptable service level (LOS "C") under cumulative conditions with the proposed project. This finding was reviewed and accepted by Caltrans and the County Transportation Department. In addition, excessive vehicle stacking for this movement is not anticipated since the left-turn pocket provides adequate storage length. Based on peak hour estimates for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. Based on the number of turning vehicles likely to arrive in an average two minute period during peak hour, the Caltrans design standard for vehicle storage in the left-turn pocket would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car). The existing 120-foot, left-turn pocket for eastbound traffic exceeds this requirement.

Response 15-6

1. Caltrans has reviewed the traffic study for the proposed project and has recommended specific intersection improvements. Signalization was not recommended. Caltrans concurred with the finding of the traffic study prepared for the proposed project that signal warrants at the intersection of Toland Road and Highway 126 would not be met.

Response 15-7

1. Signalization of the Toland Road/Highway 126 intersection is not recommended by Caltrans and is no longer under consideration. Traffic flow and traffic safety mitigation measures, as deemed appropriate by Caltrans, have been included in the EIR based on Caltrans' review of the project traffic study and evaluation of traffic flow and traffic safety. These improvements would mitigate traffic-safety issues at the intersection.
2. The project-related traffic impact which would constitute an unavoidable significant impact would be the southbound left turn movement from Toland Road onto Highway 126. As discussed in Section 3.1.2.4 of the Draft EIR, even without the proposed project, the level of service for this movement is unacceptable (LOS "E" and "F" for the "early p.m." and "p.m." peaks, respectively). The LOS for this turning movement is due to the high volume of traffic on Highway 126 and, as discussed in Section 3.11.3.1.1 of the Draft EIR, is not related to the proposed project and is not limited to Toland Road. A similar situation is expected to occur at other roads intersecting Highway 126 between Santa Paula and Fillmore (e.g., Hall Road, Sycamore Road).
3. Since under the proposed project, additional waste truck traffic would not be generated from east of the landfill, the number of vehicles turning left onto Highway 126 would not increase over existing conditions. As shown on Figure 3.11.6 of the Draft EIR, an estimated total of only four vehicles (three waste trucks and one passenger vehicle) would turn left from Toland Road to Highway 126 during the highest peak hour (p.m. peak). This level of traffic would not warrant the construction of grade separated ramps.

Response 15-8

1. Traffic flow and traffic safety for Highway 126 and its intersection with Toland Road would be mitigated by implementation of the improvements recommended by Caltrans. The traffic analysis and proposed mitigation measures were based on the "worse case" traffic scenario (waste transport by packer trucks, as defined in the Draft EIR) and on peak hour, cumulative traffic in 2015. It is not deemed necessary to limit the hours of operation to exclude peak hours or to limit the number of waste trucks during these periods as the traffic analysis has determined that traffic flow and traffic safety can be maintained with the improvements recommended by Caltrans.

Response 15-9

1. As noted in the comment letter from the County Public Works Agency, Transportation Department dated November 6, 1995 (see Comment Letter 13), County Counsel has determined that public agencies, such as VRSD, are exempt from the County's Traffic Impact Fee Ordinance 4071. While exempt from the Ordinance 4071, VRSD has agreed to include a mitigation measure in the EIR that requires the proposed project 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 proposed project. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

SECTION 2.3
LOCAL AGENCIES
COMMENTS AND RESPONSES

TOLAND ROAD LANDFILL EXPANSION DEIR COMMENTS

By: Linda Brewster

TABLE 1.1 SUMMARY OF IMPACTS AND MITIGATION MEASURES RECEIVED

PG. 1-12 Water use could incrementally contribute to cumulative reduction of the outflow from the Santa Paula/Sespe Basin to the Oxnard Plain which is in overdraft. Low flow plumbing fixtures, wash water will be collected and reused, use of all weather roads 30 acre-feet of water is required per year VRSD County Public Work Agency to purchase state water for release to oxnard. This is a significant impact!

PG. 1-16 The topographic alterations would result in some increased visibility of the landfill from some locations in the immediate project area. Insignificance stated further; noise impacts from traffic would exceed County standards to mitigate this, only noise 7 a.m. - 7 p.m. Monday through Friday. Noise barriers would be installed at a height of 6 ft. (berm, wall or combo). This again brings back the visual impact.

PG. 1-17 Noise from traffic on Highway 126 at Santa Clara School exceed County standards at present. Projects increased traffic noise does contribute to the cumulative impact making it significant and therefore NO statement of overriding consideration should be given.

Traffic movement southbound left turn operates at LOS "E" & "F". The County standards for State Highways is "D". Since intersection does not meet signal warrants per CalTrans, options are "slow trucks" signs, and a flashing yellow beacon! Since without signalization this would constitute a significant cumulative impact. NO statement of overriding consideration should be given!

PG. 1-18&19 Air Quality - the air emission are only shifting from Bailard to Toland so no increase over baseline in county! Thus not significant! unfair! Air quality because of increased vehicle miles travelled exceed the APCD's significance threshold of 25 pds per day of NOX. Therefore, this is a significant impact and NO statement of overriding consideration should be given.

- Hours of operation (Pg. 2-15) Monday through Saturday, 6:00 a.m. - 6:00 p.m., yet noise impacts (Pg. 1-16) address only construction hours of Monday - Friday 7:00 a.m. to 7:00 p.m.

- Increased vehicle traffic as per safety and accident possibilities not addressed - nearby elementary school, steep hill, lets out on Highway 126. There are now 70 vehicles with an increase to 210 or 450.

- Pg. 3. 5-3 Fire Protection - It should be noted that the Fillmore Fire Department is a Volunteer Fire Department.

- Pg. 3. 8-10-24 VRSD Landfill Siting Study 1991: "Some variation in ranking comparisons is unavoidable, due to individual judgements of the individual's ranking sites." Should be some scientific evidence or hard facts, not judgements. The Toland site ranked 5th out of 35 site the to 3 are in close proximity to Weldon.

DOCUMENT 16
LINDA BREWSTER - CITY OF FILLMORE COUNCILPERSON
RESPONSE TO COMMENTS

Response 16-1

1. As discussed in Section 3.3.8 of the Draft EIR, the mitigation measures included in the EIR regarding the quantity of water that would be used by the proposed project (see Section 3.3.7 of the Draft EIR) would offset the project's incremental contribution to the cumulative overdraft of the Oxnard Plain. By offsetting the impact, the proposed project's use of water would be mitigated to below a level of significance. Therefore, as stated in Section 3.3.8 of the Draft EIR, the proposed project would not result in significant unavoidable adverse impacts related to water quantity.

Response 16-2

1. The determination that there would be no significant impacts from the proposed project with regard to visual characteristics was based on the minimal amount of newly disturbed acreage associated with the proposed project, in addition to the project being a continuation of current landfilling activities. The increase in the height of the landfill was also considered. As demonstrated in Figures 3.9.3 through 3.9.5 of the Draft EIR, the proposed project would not extensively alter the natural appearance of the area. Therefore, impacts with regard to visual characteristics are not considered significant.
2. The visual impacts of a noise barrier for the two residences was not considered significant based on the significance thresholds as defined in the visual resource section of the Draft EIR (see Section 3.9.3). As noted in the Draft EIR, the noise barriers would be constructed to blend with the rural character of the area, such as a country style wood barrier, and could be screened with landscaping. Based on the defined visual impact thresholds, the barriers would not result in "a substantial, demonstrable negative aesthetic effect," or "significantly alter or obscure public views."
3. See Response 16-6 below for a discussion of noise mitigation measures for construction activities between the hours of 7:00 a.m. and 7:00 p.m.

Response 16-3

1. As discussed in Section 3.10.6 of the Draft EIR, the existing and future nonproject traffic-related cumulative noise conditions along Highway 126 in the project vicinity constitute a significant impact. The Draft EIR also discussed, however, that the project-related traffic volume would result in only an incremental increase to noise level at the Santa Clara School when compared to the existing and future nonproject traffic-related cumulative noise levels. Based on this finding, Section 3.10.8 of the Draft EIR specifies that a statement of overriding considerations for the cumulative nonproject traffic-related noise impact will be required.
2. As discussed in Section 3.10.4 of the Draft EIR, the proposed project's contribution to the traffic-related cumulative noise impact would be a maximum increase of 0.6 dBA under the "worse case" traffic scenario for 2015. Moreover, the noise impact due to nonproject-related cumulative traffic on Highway 126 extends beyond the vicinity of the Toland Road. Noise conditions along Highway 126 represent a regional issue and are not the responsibility of VRSD. Mitigation measures for the nonproject-related cumulative noise impacts were, therefore, not proposed as part of the proposed project.
3. CEQA provides authority to the lead and responsible agencies to approve a project which may result in significant unavoidable environmental impacts. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant impact on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the nonproject traffic-related cumulative noise impact on Highway 126.

Response 16-4

1. As discussed in Section 3.11.7 of the Draft EIR, the Toland Road/Highway 126 intersection is within the jurisdiction of Caltrans. Based on Caltrans' review of the traffic study for the proposed project, it recommended traffic safety improvements to mitigate potential project impacts (see Comment Letter 02). The traffic safety improvements recommended by Caltrans include the installation of an intersection control flashing beacon at Toland Road/Highway 126, standard intersection lighting, and appropriate signage along Highway 126. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

2. Neither Caltrans or the County Transportation Department identify hazardous conditions at the Toland Road/Highway 126 intersection. In addition, these agencies have concurred with the traffic study's conclusion that signal warrants at this intersection would not be met by the proposed project (see Comment Letters 02 and 13). Moreover, as discussed in Section 3.11.3.1.3 of the Draft EIR, the accident rate along Highway 126 in the vicinity of Toland Road is substantially lower than the statewide average. The flashing beacon and warning signs, as recommended by Caltrans and included in the EIR as mitigation measures, would mitigate potential traffic-related safety issues at the intersection.
3. Notwithstanding Caltrans' determination that a signal is not required at the intersection of Toland Road and Highway 126, in the event at some time in the future Caltrans decides a signal is required, VRSD has agreed to pay the cost for the signal. While this is not a mitigation measure in terms of CEQA, VRSD would accept a condition to this effect in the CUP for the proposed project.
4. As discussed in Section 3.11.3.1.2 of the Draft EIR, the existing 120-foot, left-turn pocket for eastbound traffic on Highway 126 at Toland Road exceeds the minimum length required pursuant to the Caltrans Highway Design Manual (Caltrans, 1995). The Caltrans design standard for left-turn vehicle storage is based on the number of turning vehicles likely to arrive in an average two minute period during the peak hour (Caltrans, 1995). If the number of trucks during the peak hour represent 10 percent or more of the traffic volume, left-turn vehicle storage space for a minimum of one passenger car and one truck should be provided. As shown in Table 3.11.2, trucks average approximately 11.5 percent of the traffic at the Toland Road/Highway 126 intersection. Based on the peak hour estimate for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The design standard for the left-turn vehicle storage length would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car).
5. Under the "proposed case" and the use of transfer trucks, during the peak hour a waste truck would arrive at the intersection an average of once every 10 minutes. Based on the longer truck length for transfer vehicles, the required left-turn storage length for the "proposed case" would be 85 feet (60 feet per transfer truck and 25 feet for the passenger car). Based on the Caltrans design standard, therefore, depending on whether packer trucks or transfer trucks are used, the required left-turn pocket length at the intersection of Toland Road and Highway 126 would

range between 65 feet and 85 feet. The existing 120-foot left-turn pocket and configuration at this intersection and approach lanes, as shown in Figure 3.11.3 of the Draft EIR, provides waste trucks and other vehicles adequate distance to safely approach the intersection.

Response 16-5

1. As discussed in Section 3.12.3.2 of the Draft EIR, the County's 1994 Air Quality Management Plan (AQMP) includes a baseline air emissions inventory categories for "Solid Waste Landfill" and "Landfill Gas Combustion." The AQMP also includes baseline air emissions inventory categories for various mobile sources including the transport of materials, which would include the transport of solid waste to landfills. Therefore, air emissions associated with landfill operations in the County are not classified as surplus or optional, but rather are considered to be part of the County's baseline emissions inventory and are taken into account in the AQMP in terms of the strategy for meeting state and federal clean air standards.
2. As discussed in the Draft EIR, air emissions associated with the proposed project would be accompanied by corresponding emissions reductions at Bailard as landfilling operations shift to Toland. Shifting landfilling operations from Bailard to Toland reflects a realignment of waste disposal within the County, and does not represent an increase over the baseline emissions inventory included in the County's AQMP. Therefore, on a County-wide basis, air emissions associated with the proposed landfill operations and onsite equipment at Toland would not represent a significant emissions impact.
3. Notwithstanding that the proposed project represents a shift of air emissions associated with solid waste disposal activities on a County-wide basis, as discussed in Section 3.12.3.2.1 of the Draft EIR, the proposed landfill operations and onsite equipment at Toland were analyzed to determine if the proposed project would result in the exceedance of state or federal ambient air quality standards at or beyond the project boundary. As documented in the Draft EIR, the proposed project would not result in state or federal ambient air quality standards being exceeded at or beyond the project boundary. Therefore, based on the significance thresholds developed by APCD, the air quality impacts associated with the onsite operations under the proposed project would be below a level of significance both on a County-wide and local basis.
4. This comment is correct in noting that offsite mobile air emissions resulting from the additional vehicle miles traveled to Toland versus Bailard to transport 1,500 tons of waste per day, would result in an significant air quality impact on a County-wide basis. As discussed in

the Draft EIR, however, the offsite mobile air emissions associated with the proposed project at Toland would be less than transporting 1,500 tons of waste per day to the Simi Valley or Chiquita Canyon landfills.

Response 16-6

1. Section 3.10 of the Draft EIR includes an analysis of the noise impacts associated with construction (Section 3.10.3.1 of the Draft EIR) and landfill operations (Section 3.10.3.2 of the Draft EIR). As discussed in the Draft EIR, noise levels from onsite landfill operations would not exceed the County's General Plan standards of 55 dBA at the residences in the vicinity of the landfill, therefore, no mitigation measures are required for the onsite operations that would occur between 6:00 a.m. and 6:00 p.m.
2. The mitigation measure included in Section 3.10.7 and Table 1.1 of the Draft EIR to limit construction activities to between 7:00 a.m. and 7:00 p.m. relates to temporary construction activities associated with the operations and maintenance center, scalehouse and detention basin during the initial phase of the proposed project. This mitigation measures was deemed appropriate based on the location of these facilities in relationship to the residences in the vicinity of the landfill.

Response 16-7

1. See Response 16-4 above. The specific issues regarding the grade of Toland Road and the potential traffic safety concerns related to Santa Clara School are addressed in Section 3.11.3.1.3 of the Draft EIR.

Response 16-8

1. It is noted that the Fillmore Fire Department is a Volunteer Fire Department. The status of the Fillmore Fire Department does not alter the findings or conclusions of the EIR.

Response 16-9

1. As noted in this comment, Section 3.8.3.1.5 of the Draft EIR acknowledges that some variation in the Toland ranking in comparison to the original site rankings is unavoidable due to individual judgments of the individuals ranking the sites. This section of the Draft EIR also

notes that "...accurate rankings were facilitated by the fact that the majority of the VRSD study criteria are specific and quantifiable, and by the level of study conducted for this EIR." As recommended by this comment, therefore, the analysis is primarily based on "scientific evidence or hard facts." Since the majority of the ranking criteria is objective in nature, the overall ranking was determined to be useful and meaningful. The ranking system, in its entirety from the VRSD Study, is included as Appendix E of the Draft EIR.

2. An overview of each of the VRSD Study sites, including the top ranking sites specified in this comment, is included in Section 4.5.3 and Table 4.4 of the Draft EIR. Although it is correct that Toland ranked lower (5th out of 35 sites) than three sites in close proximity to the Weldon Canyon site, two of these sites were determined to have "fatal flaws" for development of a landfill (County, 1992). As discussed in Section 4.5.3 of the Draft EIR, the three sites in close proximity to Weldon Canyon were determined not to reduce or eliminate significant impacts relative to the proposed project.



CITY OF FILLMORE
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Mr. Ed McCombs
November 6, 1995
Page 2

Office of the City Attorney
CITY OF FILLMORE
5425 Everglades Street, #100
Post Office Box 7209
Ventura, California 93006
Telephone: 805/644-7188

November 6, 1995

RECEIVED
NOV 06 1995
ACCOUNTING

HAND DELIVERED

Mr. Ed McCombs,
General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, California 93003-3562

Re: Toland Road Landfill Expansion

Dear Mr. McCombs:

The City of Fillmore has the following preliminary comments on the draft Environmental Impact Report ("EIR") for the Toland Road Landfill Expansion prepared by the Ventura Regional Sanitation District ("VRSD"). Due to the short review period these comments are not as complete as they would have been if more time were provided. The preliminary technical analysis of Impact Sciences, Inc., Consultant to the Cities of Fillmore, Santa Paula and neighboring landowners is enclosed. Please advise the City of Fillmore and this office when a decision on this EIR will be made and provide us with copies of the final EIR, all staff reports and notices, including the notice of determination, if any.

1. The VRSD Should Have Responded to the Comments on the Initial Study. (EIR Appendix A.)

The comments the City of Fillmore and others (including Cal EPA, Caltrans, County Public Works and other local agencies and affected landowners) on the initial study were apparently not seriously considered. No response to these comments appears in the EIR and the initial study was not modified. The City of Fillmore hereby incorporates its prior comments on the initial study and those of Cal EPA, Caltrans, County Public Works, County Flood Control, the City of Santa Paula and neighboring landowners.

2. The VRSD is Not the Appropriate Lead Agency.

The VRSD is the landowner and developer of the landfill. The County is the permitting agency. It is not appropriate for this developer to certify an EIR for its own project. The permitting agency (the County) should independently determine whether the EIR complies with the California Environmental Quality Act ("CEQA"). The VRSD's EIR evidences project bias. The County should be the agency to determine whether, in light of the project's significant adverse environmental impacts, there is sufficient need for this landfill to justify a statement of overriding considerations.

3. The Project Description is Misleading.

This should be treated as a new project. It is a new landfill on top of an old, unlined landfill, not an expansion of an existing use. A twelvefold increase from 135 tons per day to 1,500 tons per day to a height of 210 feet (over 22 stories) cannot be characterized as a modification of an existing use. To do so is like describing a skyscraper a remodel of a bungalow. The impact of the two landfills are not comparable. This improper project description fundamentally distorts the EIR in many ways. For example, the EIR's conclusions regarding potential nuisances does not analyze the nuisance potential (insects, rodents, birds, odors, etc.) of this project. The EIR relies almost exclusively on "the existing operation at Toland" for its conclusion that there will be no significant nuisance impacts. No meaningful analysis of the nuisance potential of an operation magnified 12 times is made.

The project description is also fatally flawed because it purports to limit the flow to in-county waste. The United States Supreme Court has repeatedly invalidated flow controls on foreign waste. The EIR should assume that flow controls are illegal or impractical. This aspect of the misleading project description causes the traffic, energy and air quality impacts to be underestimated.

4. Environmental Review of Alternatives is Curtailed By the Stated "Objectives of the Proposed Project".

The EIR's stated objectives of the proposed project effectively exclude any meaningful analysis of alternatives. No other alternative could ever meet the stated objectives of the proposed project because after Ballard closes Toland will be the only "existing in-county landfill with "additional in-county waste disposal capacity". "Low cost" disposal is not an environmental objective. The more expensive disposal, the more economic and likely conservation will actually occur. A broader statement of project objectives would allow for a meaningful comparison of alternatives.

5. The Statement of "Need for the Proposed Project" is Misleading.

As with the statement of objectives of the proposed project, the statement of need for the project effectively eliminates alternatives. The needs statement ignores the fact that surrounding landfills are all operating at less than capacity and assumes that none of these landfills will continue to accept waste.

The EIR discloses that Simi Valley, for example, is operating at 1/3 of its permitted tons per day. Chiquita Canyon is accepting less than 1/2 its permitted tons per day and plans to double its tons per day and expand its capacity by 30 million tons.

6. The Alternatives Analysis is Meaningless.

Because the VRSD has limited the project objectives so as to only include Toland, falsely assumed a need for additional landfill capacity in the short and long term and incorrectly described the project, its alternatives analysis is meaningless.

7. Reliance on the 1982 CoSWMP for Policy is Improper.

State policies behind the 1982 CoSWMP are out of date as is the CoSWMP. The EIR should look to the policies of the newer legislation and the County CIWMP.

8. The Project is Inconsistent With Goals, Policies and Programs of the County's General Plan.

The Ventura County General Plan's goals, policies and programs establish thresholds for significance of environmental impacts. The EIR does not adequately disclose the project's impacts in relation to the County General Plan, particularly the Plan's strong goals, policies and programs designed to protect agricultural uses.

9. Many Potential Impacts of the Project Are Not Adequately Disclosed.

An important function of an EIR is to disclose to the public the true impacts of the project. Overall the EIR fails to accomplish this requirement of CEQA by deferring analysis, incomplete analysis, and failing to analyze the cumulative impacts of the project. The long term negative impacts of this landfill on the character of the community is not disclosed.

The VRSD relies almost exclusively on the existing operating procedures at Toland for its assumption that significant impacts will not occur or future operating procedures and compliance with local, state and federal laws and remedial measures if impacts do in fact occur.

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State and federal standards are *minimum* standards. These standards, especially in light of the location of this proposed landfill, are too low for Ventura County.

An EIR is required to first disclose a project's significant impacts, then describe measures to avoid or reduce to insignificance each impact. If an impact cannot be reduced to insignificance the agency must disclose this and make findings that justify approving a project with significant impacts. The basic disclosure required by CEQA is omitted in the EIR by improperly deferring analysis of potential impacts to future study and incompletely analyzing potential impacts.

10. The Cumulative Impacts of the Project Are Not Adequately Disclosed.

The cumulative impacts on traffic and air quality are not adequately discussed. Only one intersection is looked at and the character of the traffic—diesel trucks is not adequately addressed. The cumulative impacts of the project's visual, noise, air quality, and traffic impacts on the culture and quality of life of the scenic corridor between Fillmore and Santa Paula are not, but should be, addressed in the EIR.

11. Many of the Mitigation Measures Are Vague.

Many of the mitigation measures are too vague for meaningful analysis such as "Environmental Protection and Monitoring" for leachate, drainage and landfill gas; and "nuisance monitoring" for birds, litter, odor, vectors, noise, odor, trash. An activity can have significant environmental impacts without amounting to an illegal nuisance. Without analyses the EIR concludes that seagulls will not be a problem even though seagulls are a problem at Chiquita landfill.

As stated in CIWMP's CEQA outline, the closure and post-closure plans should be described in the EIR.

12. More Detailed Geologic and Soils Investigations Should Be Conducted.

There is evidence of active faults in the area, slope creep, landsliding, soft underlying, bed rock, mass movement, mudflows, and debris flows. Nevertheless, detailed geologic investigation is improperly deferred until excavation.

13. The Biological Study is Insufficient.

This is demonstrated in the enclosed analysis by Impact Sciences, Inc.

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cont.

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Mr. Ed McCombs
November 6, 1995
Page 5

17



17

IMPACT SCIENCES, INC.
TRANSMITTAL

To: Myers, Widders, Gibson & Long
5425 Everglades Street, Suite 100
Ventura, California 93006

Attention: Katherine E. Stone

Project: Toland EIR Review

Sent Via: Courier

Date: November 6, 1995

Job No.: 181-01

Description of Transmitted Material:

- Comments on Draft EIR
- Disk with EIR comments in Wordperfect 5.1 format

Remarks:

Also delivered to Bob Sawyer.

From:

Tony Locaciato
Tony Locaciato, AICP
Principal

267 West Hillcrest Drive, First Floor
Thousand Oaks, California 91360
Phone: (805) 494-6600 • FAX: (805) 494-6681

14. The Farmlands Compatibility Analysis is Superficial.

The EIR relies on existing operating conditions for its conclusion that the landfill will not be incompatible with surrounding agricultural uses. If the true impacts of the project were disclosed, incompatibility would be evident.

Agriculture is a principal economic factor in Ventura County. The socioeconomic effects of this project's incompatibility with agricultural uses in this scenic corridor could be devastating to the community.

15. The Visual Impacts Are Significant.

A new barren ridgeline would be created. It would not be revegetated for 30 years—until closure. Experience shows that revegetation does not eliminate the eyesore. The visual impacts are especially important to the economy of Fillmore because it is a site for film making and other economically productive uses that are dependent on the character and scenic quality of the area.

Very truly yours,

J. Roger Myers
J. Roger Myers
City Attorney

JRM:gt
Enclosure

- cc: City of Camarillo
- City of Ojai
- City of Port Huene
- City of Santa Paula
- City of Thousand Oaks
- City of Ventura
- County Board of Supervisors
- Mr. Robert M. Sawyer

6:11 PM 11/06/95

Comments on Draft EIR
Toland Road Landfill Expansion

Section 1.0 Introduction

Page 1.6 mixes local and state solid waste objectives in an attempt to justify the project. In Section 1.2.2, Need for the Proposed Project, the first paragraph states that AB 939 requires counties to demonstrate 15 years of landfill capacity. The project objectives indicate the project is proposed to provide "in-county" waste disposal capacity. Paragraph 2 in Section 1.2.2 states that the AB 939 requirements justify the need for additional landfill capacity in Southern California. General statewide studies on the need for additional landfill capacity do not justify this local project.

18

Page 1-9 - The EIR states that "VRSO proposes to expand Toland to meet a portion of the long-term landfill capacity requirement for the County, thereby avoiding the environmental impacts associated with a new landfill."

19

This statement is illustrative of the biased viewpoint of the EIR. This statement concludes that expansion of the existing Toland landfill will not result in impacts. A project of the size proposed is, essentially, a new landfill. The project would add 24 million cubic yards of capacity to the landfill, increase the daily tonnage limit over ten times, the height 210 feet, and the days of operation from 5 to 6 days a week. The fact that the project would be entitled through a modification of the existing CUP does not make this an "existing" project in relation to environmental impacts. A project of this magnitude may have impacts that are equally as significant as a landfill at a new site.

Section 3.1.1 Overview of Environmental Setting

Section 15125 of the CEQA Guidelines states that an EIR must include a description of the environment in the vicinity of the project, as it exists before the commencement of a project, from both a local and regional perspective. The Guidelines state that knowledge of the regional setting is critical to the assessment of environmental impacts. The EIR fails to meet this requirement.

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The limited scope of the geographic area addressed in this section is indicative of the limited scope of analysis in the EIR. Toland is described as being located in a "confined" side canyon and no discussion of the regional environmental setting of the project is provided.

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CONT.

The Santa Clara River Valley is a unique geographic setting containing regionally important environmental resources. In addition, the valley contains small towns unique for their rural character. The EIR does not sufficiently address these qualities of the area. For example, none of the significance criteria described in this section address quality of life issues in the Santa Clara Valley.

21

Page 3.1-2 lists the significance criteria used in the EIR. The final criteria defined is the duration of the impact. As defined, two timeframes are addressed, short term (up to a few years) and long term (after closure). These definitions are not adequate for a project that will occur in a phased manner over 30 years. This project is made of 4 phases, with Phase I complete at approximately 1 year, Phase II complete at approximately 2 years, Phase III complete at approximately 11 years, and Phase IV complete at approximately 27 years. Given these timeframes, significant impacts may occur between the short and long term timeframes defined. Analysis of each phase of the project for each environmental topic is needed to adequately address this project.

22

Page 3.1-3 states that "the mitigation measures included in the ... topical sections of the EIR are considered feasible, unless otherwise noted." This conclusory statement is not supported by sufficient technical information and analysis. The feasibility of the proposed mitigation measures must be addressed individually in each topical section of the EIR.

23

Page 3.1 - 3 discusses the cumulative projects considered. The existing greenbelt is put forth as an excuse to not address cumulative growth in the Cities of Santa Paula and Fillmore. With regard to traffic impacts in particular, a wider geographic area must be addressed to sufficiently address the impacts of the project.

Section 3.2 Geology and Soils

Page 3.2-20 states that expansive soils are present but no impacts are anticipated as these soils will be "managed" through geotechnical engineering (i.e. moisture conditioning and compaction). This statement is conclusory and not properly supported. No map of onsite

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soils is presented showing the location and depth of these expansive soils. No information on what type of conditioning and compaction standards are needed is provided and no mitigation measures related to expansive soils are provided. Will areas of expansive soil be located under the landfill expansion area? Will expansive soils be used as cover material? What geotechnical engineering standards need to be met for each of these conditions? Any such standards must be demonstrated to be feasible and defined in mitigation measures imposed as conditions of approval on the project.

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CONT.

Page 3.2-20 state that onsite clay, which is a recognized mineral resource, would be used to construct the landfill liner but that the project would not bury or make inaccessible this mineral resource. These statements are contradictory as use of onsite clays for the landfill liner will make these clays inaccessible. This is a significant impact that is not recognized in the EIR.

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Page 3.2-20 states that settlement and subsidence problems are not anticipated as the underlying materials would be either bedrock or engineered fill. This general statement does not adequately address these categories of potential impacts. The analysis provided is not sufficiently detailed to support this conclusion.

26

3.2-23 - the analysis of landslide potential and similar effects is general and speculative - analysis is improperly deferred to subsequent studies. A menu of "potential" mitigation measures is provided with no information on the feasibility of these measures or their sufficiency to mitigate the potential impacts.

27

3.3-23 discusses faulting in the area and on the project site. The EIR results on several old and incomplete studies, many of which predate the Northridge Earthquake. One feature identified by Fugro in 1992 could not be located again. The EQSEARCH database search relied upon to define groundshaking, for instance, was completed in 1989. The impact section references a 1995 seismicity technical report by Environmental Solutions. If this study includes more up to date baseline information, it should be included in the existing conditions section.

28

Based on the insufficient information on existing geologic, soils & seismic conditions, only general, unexplained and unsupported impact conclusions are reached. For example, on page 3.2-28 the EIR states that proper engineering will mitigate landsliding impacts and mitigate expansive soils. Not enough information is provided to show that this is feasible.

29

Page 3.2-30 indicates that a computer program was used to estimate probabilistic peak horizontal accelerations at the project site. It would also seem appropriate to estimate peak vertical accelerations given the type of movement seen in the Northridge earthquake.

30

Page 3.2-32 defers needed analysis in the first item listed under mitigation to a subsequent slope of foundation stability report. While certain design details can be appropriately deferred to a subsequent study, the overall feasibility of the mitigation approach must be demonstrated in the EIR.

31

Section 3.3 Water Resources

Page 3.3-17 states that one of three sources may be used to provide for non-potable water needs. The feasibility of each of these methods is not discussed in the EIR. Have any technical studies been completed which show that either of the two proposed well locations are capable of producing the amount of water needed? Is there a signed agreement with the Rio Plaza Water Company at this time?

32

Page 3.3-21 The EIR correctly indicates that project may contribute to Oxnard Plain overdrafts, but the significance of this cumulative impact is not recognized. The impact is referred to as "incremental" when it should be recognized as a significant cumulative impact.

33

Section 3.4 Biological Resources

Section 3.4.2.3.2, page 3.4-10: "Fourteen sensitive wildlife species potentially may occur in the project area..." According to Appendix D.2, Observed or Expected Wildlife Species, at least 21 sensitive wildlife species are expected to occur on the site, including 15 federal Category 2 candidate species.

34

Section 3.4.2.3.2, Reptiles, 1, page 3.4-13: "Since the site soils are primarily silty clays, not sands, and much of the scrub habitat is too steep and dense for this species, it is not expected that this species occurs onsite." According to Appendix D.2, the coast horned lizard is expected to occur on the site. Two subspecies comprise this species in the region: the San Diego horned lizard (*Phrynosoma coronatum blainvillieri*) and the California horned lizard (*Phrynosoma coronatum frontale*). Both taxa are federal Category 2 candidates and state species of special concern. In this region, these two taxa possibly intergrade with each other, and as a result

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there is some taxonomic uncertainty relative to the affinity of any particular individual from the general area. However, both are sensitive, and horned lizards are expected to occur on the site.

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CONT.

Section 3.4.2.3.2, Reptiles 2, page 3.4-13: "This species may occur within the riparian corridors onsite." The coastal western whiptail lizard (*Cnemidophorus tigris multiscutatus*) typically is associated with scrub vegetation and wash habitats with open areas. As such, it is expected to occur in several habitats on the site.

36

Section 3.4.2.3.2, Birds, page 3.4-13: "The three sensitive bird species that may forage the project area include Cooper's hawk, yellow warbler, and loggerhead shrike." According to Appendix D.2, at least six sensitive bird species are expected to occur on the site, including one federal Category 2 candidate species, tri-colored blackbird (*Agelaius tricolor*), and five California species of special concern, the sharp-shinned hawk (*Accipiter striatus*), Cooper's hawk (*Accipiter cooperii*), Vaux's swift (*Chaetura vauxi*), loggerhead shrike (*Leiurus ludovicianus*), and California yellow warbler (*Dendroica petechia brewsteri*). Up to sixteen additional sensitive bird species not included in Appendix D.2 may not be expected to occur on the site, but could potentially occur or fly by.

37

Section 3.4.2.3.2, Mammals, 1, page 3.4-14: "The seven sensitive mammal species that may occur in the project area include four species of bats, Los Angeles pocket mouse, desert woodrat, and San Diego black-tailed hare (Hunt, 1995)." According to Appendix D.2, at least 11 sensitive mammal species (eight of which are bats) are expected to occur on the site, including 10 federal Category 2 candidate species, Yuma myotis (*Myotis yumanensis*), long-eared myotis (*Myotis evotis*), fringed myotis (*Myotis thysanodes*), long-legged myotis (*Myotis volans*), spotted bat (*Euderma maculatum*), Townsend's big-eared bat (*Plecotus townsendii*), greater western mastiff-bat (*Eumops perotis californicus*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), Los Angeles pocket mouse (*Perognathus longimembris brevinasus*), and San Diego desert woodrat (*Neotoma lepida intermedia*), and a California species of special concern, the pallid bat (*Antrozous pallidus*).

38

Section 3.4.2.3.2, Mammals, 1, page 3.4-14: "Suitable roosting habitat for pallid bat, Pacific western big-eared bat, greater western mastiff bat, and spotted bat is not located within the project site, and these species were not observed during the field survey." Bat surveys should include daytime searches for appropriate roosting sites and nighttime listening and mist-netting activities conducted by a qualified bat biologist working under a Memorandum of

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Understanding with the California Department of Fish and Game. No mention was made of bat survey methodologies. If specific, intensive survey methods were not used, then these bats would not have been detected if present.

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Section 3.4.2.3.2, Mammals 2, page 3.4-14: "This species was not observed onsite, and the only possible habitat is the elevated northern periphery of the project area." To determine the presence or absence of the Los Angeles pocket mouse requires intensive survey methods including small mammal live trapping by a qualified mammalogist working under a Memorandum of Understanding with the California Department of Fish and Game. No mention was made of small mammal trapping methodologies. Trapping for Los Angeles pocket mice requires specific techniques due to the very small size and light weight of this taxon. If specific, intensive survey methods were not used, then Los Angeles pocket mouse would not have been detected if present.

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Section 3.4.2.3.2, Mammals-3, page 3.4-14: A small mammal trapping program conducted by a qualified mammalogist working under a Memorandum of Understanding with the California Department of Fish and Game should be undertaken to accurately estimate the distribution and abundances of San Diego desert woodrat on the site.

41

Section 3.4.2.3.2, Mammals, 4, page 3.4-14: "This species was not observed onsite, and suitable habitat occurs only within the level stream terrace portions adjacent to O'Leary Creek." To thoroughly evaluate the presence or absence of San Diego black-tailed jackrabbit on the site, repetitive spotlight surveys should be conducted, and tracking stations should be established and monitored along possible jackrabbit trails. No mention was made of survey methodologies.

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Section 3.4.3.1.2, page 3.4-15: There may be more than two sensitive plant species which could potentially occur on the project site. Botanical field surveys conducted by a qualified botanist would be required to fully evaluate the botanical resources on the site. These surveys should be conducted during several periods to correspond to differing bloom periods (for example, early spring, late spring, and mid-summer). Would the increased potential for introduction of non-native, invasive weedy plant species have a significant impact on the nature and structure of native communities on the site, particularly the sensitive coastal sage scrub, riparian vegetation, and reeps?

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Section 3.4.3.1.3, page 3.4-15: See comments for Section 3.4.2.3.2, page 3.4-10 above. To fully evaluate the potential impact of this project on sensitive wildlife species, a complete

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understanding of their presence or absence is required. Complete surveys using appropriate methodologies and qualified biological specialists should be conducted to determine presence or absence, and to accurately estimate distribution and abundance of these sensitive species. Would the increased potential for introduction of aggressive 'vector' wildlife species (both native and non-native) have a significant impact on the nature and structure of native wildlife communities in general and sensitive wildlife species in particular on the site? Examples of 'pest' species potentially associated with a landfill and ancillary facilities which could disturb local wildlife include black rat (*Rattus rattus*), house mouse (*Mus musculus*), brown headed cowbird (*Molothrus ater*), and gulls (*Larus spp.*)

44 CONT.

Section 3.4.3.1.3, 2, page 3.4-17: "This effect would be minimal and could occur only during...Therefore, the proposed project would not be a significant impact on bats species." The conclusion as to significance of this potential impact is purely speculative, and is not based on any knowledge as to what extent bats currently use the site, nor to what extent current usage would be affected by the proposed project. Complete, directed bat surveys would need to be conducted to evaluate which bat species are present, and to understand how these bats currently utilize the site, prior to reaching such a conclusion of 'not significant'.

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Section 3.4.3.1.3, 3, page 3.4-17: See comments for Section 3.4.2.3.2, Birds, page 3.4-13 above. In addition, there has been a recent observation (June 1995) of a coastal California gnatcatcher (*Polioptila californica californica*) in the Moorpark area of Ventura County, about ten miles southeast of the site. This federally threatened species historically occurred in the region, and may be expanding into previously occupied areas. Some level of directed survey effort for gnatcatcher, using taped vocalizations, should be pursued to evaluate the potential occurrence of this bird. Also, potential impacts to the California condor (*Gymnogyps californianus*) need to be discussed.

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Section 3.4.3.1.3, 4, page 3.4-17: "Based on the above, significant impacts to these species, if present at Toland, would not occur as a result of the proposed project." See comments above relative to the need to evaluate the presence or absence of these species prior to analyzing potential impacts. In particular, if a population of Los Angeles pocket mouse was present on the site and subject to disturbance as a result of the project, the impact would be undeniably significant.

47

Section 3.4.3.1.4, page 3.4-18: "Animals currently using the canyon are adjusted to existing landfill activities, which would be similar to those under the proposed project. Therefore, the

proposed project would not result in a significant impact" However, the proposed project may entail operations occurring between the hours of 5:30 a.m. to 7:00 p.m., or 13.5 hours a day, compared to the current activity schedule of 8 hours a day. From the perspective of wildlife currently using the canyon and other portions of the site for a movement corridor, the proposed project would not be similar to what they have become 'adjusted to', because most mammals are active at night. Under current operations, there is apparently little nighttime activity which would constrain wildlife movement, hunting, foraging, or other uses of the site. With the extension of landfill activities into the early morning and evening hours, wildlife behavior patterns would be subject to disruption. This disturbance could be especially severe for crepuscular species such as bats (that is, those primarily active at dusk and dawn). To fully evaluate the severity of this potential impact, data relative to the nighttime use of the site by wildlife is required. These data can be gathered using spotlight survey effort, scent station monitoring, and remote camera stations to document the use of corridors by wildlife. These data must be gathered and analyzed prior to reaching a conclusion of 'not significant'.

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Section 3.4.3.1.5, page 3.4-18: With mitigation, the project would apparently avoid direct impacts to the riparian corridors and the seeps. However, the DEIR does not discuss indirect impacts to these areas, particularly the one seep which will only be avoided by 50 feet. What affect will alteration of drainage patterns or de-watering (if required) have on the ground water and the subsequent source for the seeps? Any impact to the freshwater marsh vegetation present at one of the seeps would be significant. Any impacts to the riparian vegetation would also be significant. With disturbance allowed within just 50 feet of a wet area such as a seep, a high potential exists for establishment of non-native invasive weed species from seed sources in the landfill. If these weedy species become established, they would likely soon dominate and out compete the native plant taxa, especially in the presence of water. As such, the biological value of these sensitive wetlands areas could be severely degraded by these indirect impacts, even though the project did not result in their direct removal.

Section 3.4.3.2, 2, page 3.4-19: The revegetation potential for covered landfill sites is limited relative to re-establishment of high-value wildlife habitat, due to the nature of the capping material. In general, there is one to two feet of soil placed over a relatively impermeable cap. As such, any vegetation established on top of this cap can not have deep roots. The resultant vegetation would likely lack the structural diversity which typically characterizes high quality wildlife habitat.

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Section 3.4.4.1, page 3.4-19: "Project effects on habitat fragmentation and wildlife movement, therefore, would result in a temporary rather than permanent contribution to this cumulative impact and would not be significant." This conclusion of 'not significant' assumes that vegetation which is lost over the lifetime of the project is being replaced with vegetation which possesses similar wildlife habitat values. Based on the limitations of revegetation efforts on capped landfills (see above), it is not likely that the replacement vegetation will attain the structural complexity or diversity necessary to provide high quality wildlife habitat. As such, there is no basis for the determination that the effects on habitat and wildlife use of the site would result in a temporary contribution to cumulative impacts.

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Section 3.4.4.2, page 3.4-19: "Impacts would be mitigated to the extent that the entire landfill would not be disturbed at the same time, but rather in phases over its approximate 31-year operational life." Scheduling of the proposed project reflects project design. It does not represent mitigation to reduce the severity of project related impacts. See above for discussion of 'temporary' impacts.

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Section 3.4.4.3, page 3.4-19: See comments for Section 3.4.3.1.5, page 3.4-18 above. Indirect impacts to the riparian corridors and seeps could add to the cumulative impacts to riparian habitats in the region.

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Section 3.4.4.4, page 3.4-20: "Long-term cumulative impacts to plant and animal populations would not be significant." This conclusion of 'not significant' can not be made absent site specific data relative to the presence or absence of certain sensitive species. For example, if Los Angeles pocket mice inhabit the site and would be subject to disturbance, the cumulative impact of this disturbance would be significant.

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Section 3.4.6, page 3.4-20: "Sensitive species were considered during impact analysis, and significant impacts to these would not occur due to project design or mitigations." No information relative to intensive, focused surveys was presented in the DEIR. Absent the data gathered through appropriate survey techniques, a conclusion of 'not-significant' can not be substantiated.

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Section 3.4.7, page 3.4-21: "The bank of 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." Additional mitigation should be required which mandates that these plantings

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consist of native vegetation representative of that present on the site, established with locally-gathered seed source. The specifics of all proposed revegetation efforts (including the establishment of success criteria) should be detailed in a revegetation and monitoring plan, to be prepared and reviewed during this required CEQA process. A five-year monitoring effort should be required, with contingency measures should the established success criteria not be met.

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Section 3.4.8, page 3.4-21: The conclusion of 'not-significant' is speculative, and is apparently based on incomplete information relative to the understanding of biological resources present on the site.

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Section 3.8 Land Use

Page 3.8-2 states that "In the case of Toland, the County will review the proposed project for General Plan Consistency in conjunction with processing of the required modification to CUP 3141 of the landfill." Deferring this type of analysis to a later date deprives the public of the chance to comment on this information. This is not consistent with the requirements of the CEQA. Full analysis of the consistency of the project with the County General Plan must be provided in the EIR. An additional 45 day review period needs to be provided to allow for the public to meaningfully review this information.

57

Page 3.8-2 states that Toland is designated as a "Solid Waste Disposal Site" on the Public Facilities Map and therefore, the project is consistent with the applicable General Plan criteria. It is not clear whether the existing designation on the Public Facilities Map applies only to the existing footprint of Toland or to the proposed footprint. The map should be reproduced and all related text from the element should be included in the EIR to clarify this point.

58

Page 3.8-22 includes a ranking of Toland under the previous VRSD siting criteria. Inclusion of this analysis in an EIR completed by VRSD for a project proposed by VRSD is self-serving at best and misleading. Detailed explanation of the ratings included in Table 3.8.3 should be included in the EIR to justify inclusion of this information.

59

Section 3.9 Visual Resources

Page 3.9-2 describes the sensitive viewsheds identified for the project. This section does not properly identify a viewshed but instead identifies 3 viewpoints. The text in Section 3.9.2.2 discusses the existing views of the landfill. The viewshed of the proposed landfill project should be defined to include all areas from which the proposed landfill can be seen. Given the height of the proposed landfill, this viewshed is large. There may be many other sensitive viewpoints in this viewshed that should be analyzed to properly assess the impact of the project.

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Page 3.9-2 states that Toland is not "within" a designated scenic resource area or "on" a designated scenic highway. The proper question for analysis is whether the landfill will be visible from any scenic area, recreational trail, or scenic highway. In addition, designation as a scenic highway or resource should not be the sole criteria used for evaluation. As stated on page 3.9-1 of the EIR, the General Plan calls for the preservation of significant open views in the County. Within the greenbelt area along Highway 126 in this area, significant open views are available.

61

Page 3.9-4 includes a discussion of the change in the visual characteristics of the site which concludes that the visual impact is not significant as the number of additional acres of disturbance is "low" and the use of the site as a landfill is already established. This conclusion ignores the fact that the increase in the height of the proposed landfill is the critical element to be considered and not the number of additional acres to be disturbed. Given the large increase in the height of the landfilling proposed, this impact must be considered significant.

62

Page 3.9-4 includes a discussion of the visibility of the project from offsite viewpoints which concludes that the landform alteration is not significant as the surrounding topography is mountainous and the views of the landfill are screened by vegetation and orchards. This conclusion is simplistic and incorrect.

63

This analysis only considers the impact of the project after closure and revegetation of the site. Completely ignored is the fact that the project will take 30 years to complete. The analysis ignores the visual impacts of the project during build-out of the landfill. The visual impact of each phase of the landfill, during and after completion of each phase, should be analyzed and considered. Visual simulation of each of these conditions should be provided. Phases III and IV, which will take 11 and 13 years to complete, substantially increase the height and

visibility of the landfill from throughout the viewshed. During construction of the landfill, the open working face will be visible from a wide area. This view will consist of a dirt face with tractors and other heavy equipment.

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CONT.

The visual simulations provided for year 15 incorrectly show a "naturalized topographic feature" shown here revegetated". Year 15 is in the middle of Phase IV as defined in the EIR project description. The view at this time will not include a revegetated slope, but rather the open face of Phase IV of the landfill.

64

The statement that the landfill will present a "naturalized topographic feature" is not justified by any information in the EIR. The project description includes a description of the process for building the "daily cells" at the landfill. Tractor dozers and compactors will spread waste over the working face in 1-3 foot layers throughout the day. Compaction equipment will make 3-5 passes over the face. Cover material, which may be soil, or as described on page 2-24, tarps, sheets, foam, or other synthetic material, will be applied daily. To accept the waste, 50 foot vertical benches will be constructed. Periodically, the construction of drainage, leachate and gas control systems will occur. Based on the project description, these activities may be visible from throughout the area for over 20 years at a minimum. This visual impact must be identified as significant.

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No standards are presented as a part of the project or as mitigation measures that would require landform grading techniques at closure that would result in the "naturalized" topography shown in the visual simulations. Based on the project description, the landfill will be constructed in a manner that results in a terraced mechanical look.

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No information is provided on the plant palette proposed for the revegetation program. Use of native species is mentioned but no defined list is presented. In addition, no information is presented on the feasibility of revegetating a closed landfill at Toland with a natural plant palette that would include a mix of plants that approximates the vegetation on surrounding hills. The visual simulations of the landfill at 30 years show that the landfill will be highly visible from the Highway 126. This intrusion into a natural viewshed is plainly a significant impact. The visual analysis, conclusions, and mitigation are all inadequate.

67

Section 3.10 Noise

The EIR concludes that the proposed project would cause significant project-specific and cumulative noise levels increases along Toland Road and Highway 126 in the project vicinity. However, the EIR does not indicate where noise levels along Highway 126 would no longer be considered significant. The EIR should assess project and cumulative noise impacts in the Cities of Fillmore and Santa Paula given the noise generating characteristics of the large truck traffic generated by the landfill.

68

Section 3.11 Transportation and Circulation

Page 3.11-4 presents intersection turning movement counts for a single intersection, Toland Road and Highway 126. No justification for limiting the scope of the traffic study to just one intersection is provided. As described on page 2-26 of the project description, up to 450 trips per day may result as waste from throughout western Ventura County is brought to the site. Additional intersections up and down Highway 126 from Toland Road and any other major access routes to the landfill must be analyzed to determine if significant impacts will occur.

69

No information on the distribution of trips is presented. What is the expected distribution of trips north and south on Highway 126? What other major routes in the area are anticipated to carry landfill traffic? How many trips would be on these routes? Without this information, it is impossible to judge if the scope of the traffic study is proper.

70

Page 3.11-19 discusses the peak hour volumes. No justification for the peak factor used is provided. Given the uniqueness of Toland Landfill, a site specific trip generation study should be conducted to determine an appropriate peaking factor for landfill traffic. Without use of an appropriate peaking factor, it is impossible to determine if the proposed 70 and 120 foot long turn pockets proposed on Highway 126 are adequate.

71

3.11-22 states that signal warrants will not be met with the project. Table 3.11.8 shows that warrants are nearly met on the basis of traffic volumes alone. Traffic volumes are only one consideration in the evaluation of the need for a traffic signal. The special characteristics of the type of truck traffic associated with the landfill should also be considered. Given proper consideration of this factor, a signal is most likely required.

72

3.11-22 also addresses the turning movements associated with the Santa Clara School by using a well recognized "rule of thumb" to assess the length of the turn lane needed for the Santa Clara School at peak hour. No discussion of the amount of peak hour traffic associated with the school is presented. Given the unique location of the school and the surrounding area, traffic counts should be obtained to determine the true peak hour traffic characteristics of the school to allow for a proper analysis.

73

Page 3.11-24 simplistically addresses traffic safety by considering the percentage increase in traffic on Highway 126 that would result from the project. This approach ignores the special safety concerns associated with large trucks queuing up to turn in and out of Toland Road 6 days a week. The safety analysis should consider the amount of time needed for heavy trucks to accelerate and complete turns in and out of Toland Road.

74

3.11-25 addresses cumulative traffic impacts and relies exclusively on Caltrans growth projections for Highway 126. To properly assess cumulative traffic impacts, individual projects in Fillmore, Santa Paula, and a wider area of the unincorporated area in the Santa Clara River Valley should be considered and additional intersections analyzed to determine if the project's contribution to cumulative impacts is significant.

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Cumulative traffic impacts are not assessed with the applicable significance threshold as requested by the County of Ventura Planning Division. In the NOP response letter from the County's Planning Division, it is noted that if an existing or projected cumulative impact occurs, the project's contribution to this impact is considered to be significant, no matter how small this contribution is. This standard is not used in the traffic section or any other section of the EIR. If the applicable County standard were used, many additional cumulative impacts would be identified. This EIR continuously dismisses the project's contribution to cumulative impacts as "incremental" without properly assessing the significance of the cumulative impact or appropriate mitigation. As the County's standard is not used, the Board of Supervisors cannot certify and use this EIR as the EIR for the proposed modification of the CUP. As the County is a responsible agency for this action, this threshold should have been used.

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Section 3.12 Air Quality

The proposed project's off-site vehicle emissions were calculated based on the predicted increase in vehicle miles traveled. This is a correct methodology to use if the proposed project would not increase the number of regional vehicle trips associated with the transport of solid

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waste and the decision-maker only needed to know the increase in running emissions. However, the EIR does not indicate whether the number of trips generated by the project is the same, less than, or greater than the trips currently generated by the Bailard and Toland Road Landfills. If there is an increase in regional vehicular trips, the EIR has underestimated the project's emissions because no quantification of hot starts, cold starts, hot soak, and diurnal emissions is provided.

77 CONT.

The analysis of carbon monoxide hotspots is presented for only one location in the project vicinity. The EIR should include analysis to determine if the project has the potential to significantly affect other locations along Highway 126 where there may be greater traffic congestion such as in the Cities of Fillmore and Santa Paula.

78

Section 3.14 Nuisances

The entire nuisance discussion is based on the current condition of the landfill and the assumption that VPSD will continue to operate the landfill in the same manner. Based on these assumptions, no impacts are identified. This simple logic ignores the fact that the daily amount of waste at the landfill will increase over ten times from 135 tons per day to 1,500 tons per day and the days of operation will be increased from 5 to 6 days. Existing nuisance conditions at the landfill are minimized by the low amount of waste accepted on a daily basis. At 1,500 tons per day there will be a much larger open working face than currently exists, which will be a further attraction to birds and will increase the level of all the nuisance factors addressed in this section. As described in the project description, Toland is currently located in a "confined" side canyon. Phase III and IV of the landfill will result in the landfill being raised up and out of the "confined" canyon. This change in the configuration of the landfill in conjunction with the large increase in the amount of waste accepted on a daily basis will greatly increase the level of nuisance in surrounding agricultural areas. No analysis of the effectiveness of any of the operating measures proposed to minimize nuisance factors is provided for a daily landfill operation over ten times larger than the existing operation.

79

Page 3.14-14 discusses the potential for littering to increase and states that while vehicles are required to be covered when transporting waste to the landfill, problems may occur. As stated in this section, commercial vehicles are checked at the scalehouse to determine if they are covered. If they are not, it is stated that "appropriate actions" will be taken. These actions are not defined or discussed. After a truck has already arrived at the landfill, there is no "appropriate action" that will remove the litter blown out of the truck along local roadways.

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There is no discussion of the amount of uncovered vehicles which currently use the landfill and no projections of what the likely increase will be based on current trends. It is noted that private vehicles are even more difficult to control and that private vehicles will increase litter along area roadways. There is no discussion of the amount of vehicles currently using the landfill or what the likely number of private vehicles using the landfill will likely be after it is expanded. With the amount of waste being accepted increasing over 10 times on a daily basis and the days of operation increasing from 5 to 6 days, it is likely that this impact will now be at a level considered to be significant using the thresholds defined in this section. There are no demonstrated methods to eliminate this problem and it will increase in direct relation to the increased level of waste accepted on a daily basis. The nuisance level of landfills is demonstrated by the large number of regulations imposed on operation of a landfill by the State. Additional analysis is required to properly address nuisance impacts. This analysis is warranted given the unique aesthetic character of this portion of the Santa Clara River Valley.

80 CONT.

Section 3.15 Health and Safety

Again, this section addresses potential hazards based on the current level of operations at the landfill. This simplistic methodology ignores the huge increase in the level of operations proposed as well as the changed configuration of the landfill proposed.

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Page 3.15-7 discusses fire hazards and dismisses the potential for impacts due to the fact that "There have been no reported incidents of hot loads entering the landfill." What records were used to justify this conclusion? How effective will the program of inspecting incoming loads be when the volume of waste accepted on a daily basis increases over ten times? What is the current number of landfill employees dedicated to inspecting loads with 135 tons per day being accepted? How many employees will be dedicated to inspection for 1,500 tons per day of waste? While mitigation of numerous health, safety, and nuisance hazards is related to the inspection program, little detail on this program or its likely effectiveness is discussed. This additional information must be provided to demonstrate that this program will feasibly mitigate these impacts.

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What effect will the increased height of the landfill in Phases III and IV have on the probability that a fire will spread to offsite locations? During these phases the landfill will

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no longer be contained in a "confined" side canyon, but will extend above the canyon. When local wind patterns are considered, what is the probability for a fire to spread to offsite locations around the landfill?

Section 4.0 Alternatives

Section 15126 (d) (2) requires that the rationale for selecting the alternatives included in the EIR be discussed. There is no discussion of why the alternatives included in the EIR were selected, other than stating that the alternatives selected were based on "their relative ability to meet the objectives of the proposed project or to reduce or eliminate environmental impacts." Further discussion of the screening process used to identify and evaluate potential alternatives is required by the CEQA Guidelines and must be included in the EIR. The CEQA Guidelines also require that the EIR identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and explain the reasons underlying these determinations. The alternative analysis cannot be evaluated for adequacy without this important required information. Provision of this information in a Final EIR will result in the public and responsible agencies being denied the chance to review and comment on this information. At a minimum, the alternatives section should be circulated for an additional 45 day review period to ensure that the requirements of CEQA are met.

DOCUMENT 17
CITY OF FILLMORE - OFFICE OF THE CITY ATTORNEY
RESPONSE TO COMMENTS

Response 17-1

1. Comments received on the Initial Study were addressed in the Draft EIR. As stated in Section 15063 of the CEQA Guidelines, the purposes of an Initial Study include assisting in the preparation of an EIR by: (1) focusing the EIR on the effects determined to be significant; (2) identifying effects considered not to be significant; and (3) providing an explanation for determining that potentially significant effects would not be significant. In addition, if as in the case of the proposed project, the lead agency determines an EIR will clearly be required, CEQA states that an Initial Study is not required, but may still be desirable (Section 15063 of the CEQA Guidelines).

2. Comments received on the Notice of Preparation as a result of the scoping process were considered during preparation of the Draft EIR. Issues raised by the City of Fillmore during the scoping process (letter dated March 30, 1995) and where they are addressed in the Draft EIR are as follows:
 - *Expansion of Toland is unnecessary* - The purpose and need for the proposed project was included in Section 1.2.2 of the Draft EIR.
 - *VRSD is not the appropriate lead agency* - This was not specifically discussed in the Draft EIR. CEQA Guidelines lists criteria for identifying the lead agency when two or more public agencies will be involved with a project:
 - "If the project will be carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency." (Section 15051 (a))
 - "Where more than one public agency equally meet the criteria in subsection (b), the agency which will act first on the project in question shall be the Lead Agency." (Section 15051 (c))

Based on the criteria listed in the CEQA Guidelines, VRSD is the appropriate lead agency for the proposed project. VRSD acting as the lead agency for the proposed project is analogous to a city or county acting as the lead agency for a public works project they are implementing. Other agencies (referred to in the CEQA Guidelines as responsible agencies) will use the EIR in the process for issuance of the various permits required for the proposed project. The pertinent requirements of these agencies have been considered in the environmental analyses.

 - *The project description is inadequate* - CEQA Guidelines state that an Initial Study is used to assist in the preparation of an EIR. The Initial Study/NOP for the proposed project included in brief form a description

of the project including the location of the project as per Section 15063 (d)(1) of the CEQA Guidelines. A detailed project description was included as Chapter 2.0 of the Draft EIR.

- *The surrounding land uses and setting information required by CEQA is insufficient to assess potential impacts on the environment* - As stated above, an Initial Study is a brief document used to assist in the preparation on an EIR. Detailed baseline information was included for each resource topic in Chapter 3.0 of the Draft EIR. Regarding land use, Section 3.8 of the Draft EIR provided a detailed discussion of the surrounding land uses.
- *The NOP places too much reliance on current operations at Toland to justify curtailed environmental review* - A full discussion of impacts was included for each resource section in Chapter 3.0 of the Draft EIR.
- *Expansion of Toland is inconsistent with VRSD's current siting criteria and policy* - Sections 3.8.3.1.5 and 4.5.3 of the Draft EIR included a detailed discussion of the siting criteria.
- *VRSD must consider all feasible alternatives including the No Project alternative* - Alternatives were discussed in detail in Chapter 4.0 of the Draft EIR, including the No Project alternative that was discussed in Section 4.8 of the Draft EIR.
- *Closure of the existing landfill should be discussed* - Section 4.8 of the Draft EIR discusses the No Project alternative, which would involve the closure of Toland.
- *The initial study checklist does not comply with the CEQA Guidelines* - There is no specific format that is required for an Initial Study. The CEQA Guidelines provide an example, but do not require a specific format. The following is included in the CEQA Guidelines regarding the format of an Initial Study:

"Sample forms for an applicant's project description and a review form for use by the Lead Agency are contained in Appendices H and I. When used together these forms would meet the requirements for an Initial Study, provided that the entries on the checklist are briefly explained pursuant to subsection (d)(3). These forms are only suggested, and public agencies are free to devise their own format for an Initial Study." (Section 15063 (f))

Detailed analyses for the resource sections listed in the comment were included in Chapter 3.0 of the Draft EIR.

- *The discussion of Initial Study responses is inadequate* - As stated above, the Initial Study is a brief document used to assist in the preparation of an EIR. Issues discussed in the Initial Study were addressed in more detail in the Draft EIR.

Response 17-2

1. As discussed in Response 17-01 above, VRSD is the appropriate lead agency for the proposed project, pursuant to Section 15051(a) of the CEQA Guidelines that identify the criteria for determining the lead agency.

2. The EIR will be used by various local and state agencies in their consideration of the various permits required for the project (Section 1.6 of the Draft EIR). The County, as a responsible agency, is required by the CEQA Guidelines "...to assist the Lead Agency in preparing adequate environmental documents for the project. By this means, the Responsible Agency will ensure that the documents it will use will comply with CEQA" (Section 15096(b)). If the County believes the EIR is not adequate, CEQA outlines subsequent measures to be followed to assure that concerns of a responsible agency are addressed. In addition, responsible agencies can add measures to mitigate concerns through the permitting process.

Response 17-3

1. It is unclear as to what this comment is referring to regarding the proposed project being a "modification." As stated in Section 1.4.1 of the Draft EIR, the proposed project is a vertical and lateral expansion of the existing landfill, and an increase in the daily tonnage to 1,500 tpd.
2. CEQA requires state and local government agencies to consider the environmental consequences of projects over which they have discretionary authority, prior to taking action on those projects. Whether this is considered a new project or an expansion of an existing land use, the environmental process is the same. Under either scenario, an EIR is required to evaluate and disclose the potential environmental impacts of the proposed project.
3. Environmental issues (including nuisance issues) were evaluated based on the potential impacts of the proposed project in Chapter 3.0 of the Draft EIR, not the current operations at Toland. As discussed in Section 3.14 of the Draft EIR, the conclusion that there would be no significant nuisance impacts was based on: (1) analysis of the potential nuisance impacts of the proposed project; and (2) implementation of operational and regulatory procedures, and the mitigation measures included in the Draft EIR.

Response 17-4

1. While this comment is correct that the U.S. Supreme Court has ruled that public/political jurisdictions (e.g., county, city, state) may not pass laws, regulations, or ordinances that prohibit the importation of waste for disposal at a landfill within their jurisdiction, the owner/operator of a landfill is not prohibited from making or agreeing to a condition not to accept waste from outside a public/political jurisdiction. Therefore, VRSD's decision that, as part of the proposed project (see Section 2.1 of the Draft EIR), Toland would only accept

waste generated in the County or waste from transfer stations/materials recovery facilities located in the County is not prohibited by the ruling of the U.S. Supreme Court. Therefore, the EIR has not underestimated the traffic, energy and air quality impacts of the proposed project.

2. VRSD will work directly with the County to develop a mutually agreeable mechanism as part of the CUP to enforce the provision that Toland would only accept waste generated in the County or waste from transfer stations/materials recovery facilities located in the County.

Response 17-5

1. In accordance with Section 15126 (d) of CEQA, the selection of alternatives shall be based both on the feasibility of attaining basic project objectives and on the potential to reduce or eliminate significant environmental impacts. The guidelines specify that the discussion must focus on alternatives capable of reducing environmental impacts, "even if such alternatives would be more costly or to some degree would impede the project's objectives." The project objectives are defined by the project proponent, but CEQA does not limit these to environmental objectives. As noted by this comment, it is acknowledged that "low cost" is not an environmental objective, however, it can be included in the EIR as an objective of the project.
2. The scope of alternatives evaluated in Chapter 4.0 of the Draft EIR was not limited by the project objectives. Numerous out-of-County alternatives are evaluated including the Chiquita, Sunshine, and Elsmere (proposed) landfills in Los Angeles County, and existing and proposed rail-haul facilities in southern California as well as Carbon Canyon Landfill in Utah. In addition, the definition of project objectives did not limit the analysis of in-County landfills to existing facilities. In accordance with CEQA, a comparative analysis is provided for each alternative in Chapter 4.0 of the Draft EIR, including its ability to meet project objectives and its ability to eliminate or reduce environmental impacts relative to the proposed project.

Response 17-6

1. No potential project alternatives were eliminated by the statement of need for the proposed project. Section 1.2.2 of the Draft EIR described the regulatory requirement for long-term solid waste disposal capacity for the County and reviewed current waste generation trends. A specific review of surrounding landfills is not included in this section, nor does this section "...assume that none of [the surrounding] landfills will continue to accept waste."

- Existing landfills in the County and surrounding counties as alternatives to the proposed project were evaluated in the Chapter 4.0 of the Draft EIR. Simi Valley and Chiquita Canyon landfills, the examples provided in this comment, were evaluated in Sections 4.2.1 and 4.3.1.1, respectively, of the Draft EIR.

Response 17-7

- The alternatives analysis in Chapter 4.0 of the Draft EIR is comprehensive, objective, and meaningful. The definition of project objectives did not limit the consideration of alternatives. The Draft EIR evaluated the following 32 alternatives:

<u>Alternative</u>	<u>Number Evaluated</u>
In-County landfills (waste transport by truck)	1
Out-of-County (waste transport by truck)	4
Rail-haul alternatives	4
Offsite alternative location (within County)	20 ⁽¹⁾
Resource Recovery	1
Reduced Project	1
No Project	<u>1</u>
TOTAL	32

(1) Comparative impact analysis of top 20 sites identified in previous siting studies (VRSD Siting Study, CoSWMP, and Weldon Canyon EIR).

- The potential for surrounding landfills to accommodate waste proposed to be disposed at Toland under the proposed project is discussed in Chapter 4.0 of the Draft EIR. The need for landfill capacity in both the short-term and long-term is documented in the EIR. This finding is confirmed by a recent CIWMB report which lists Ventura County as 1 of 21 counties statewide which has less than 15 years remaining disposal capacity (CIWMB, 1995). In addition, as discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion program implemented under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County has only nine years of remaining landfill capacity (County, 1995a).

Response 17-8

- As discussed in Section 3.8.1.5 of the Draft EIR, the CoSWMP, which was adopted in 1985, is the County's primary regional solid waste planning document until adoption of the CIWMP. The Draft EIR included a review of recent legislation regarding solid waste management and the status of the CIWMP (see Section 3.8.1.4 of the Draft EIR).

Response 17-9

1. Sections 3.8.1.1.1 and 3.8.3.1.1 of the Draft EIR discussed the relationship of the County General Plan's Goals, Policies and Programs to the proposed project and reviewed policies specifically related to solid waste facilities. Typically, a review of the proposed project for consistency with the General Plan is conducted by the County in conjunction with processing the CUP. Policies related to resources, hazards, land use, and public facilities are analyzed in the Draft EIR within the respective impact and mitigation sections for each topical area.

Response 17-10

1. The Draft EIR includes a comprehensive analysis of the potential impacts of the proposed project as well as measures (operational, regulatory, and mitigation) to avoid or reduce impacts below a level of significance. Table 1.1 of the Draft EIR summarized potential impacts and mitigation measures for the proposed project. The comment is general and does not reference specific impacts the commenter believes were not completely analyzed.
2. With regard to the commenter's statement about state and federal standards being "...too low for Ventura County" responsible agencies that oversee the required permits for the proposed project can include additional mitigation through the permit process, to preserve resources that they may feel need additional protection in the County.
3. The comment is incorrect in suggesting that the Draft EIR did not identify significant impacts associated with the proposed project and mitigation measures that would avoid or reduce these impacts. As summarized in Section 1.3.2 of the Draft EIR and as discussed in detail in the topical sections of Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

Response 17-11

1. The cumulative analysis in the Draft EIR for air quality, noise, and traffic incorporated projected traffic levels for 2015 as provided by Caltrans. Between 1993 and 2015, a 79 percent increase in traffic along Highway 126 has been projected. As discussed in Section 3.11.4.1 of the Draft EIR, under the "worse-case" (i.e., packer trucks) traffic scenario, project-related traffic would only represent approximately 2.3 percent of the future ADTs on Highway 126. Project-related traffic would only affect "through" traffic at intersections other than Toland Road and Highway 126 and would not generate additional turning movements between Santa Paula and Fillmore. Since the project-related increase in through traffic is conservatively included in the projected ADTs for Highway 126, the proposed project would not substantially affect intersections other than Toland Road and Highway 126.
2. With respect to the "character" of traffic, air quality, noise and traffic impact analyses were conducted specifically for diesel trucks. Air quality modeling for both onsite and offsite emissions was based on factors for diesel vehicles. Actual noise measurements (at Toland and Bailard landfills) for both the waste transfer vehicles and onsite operating equipment served as the basis for the noise analysis.
3. Potential land use compatibility and cumulative land use impacts were discussed in Sections 3.8.3.2 and 3.8.4 of the Draft EIR, respectively. As evaluated in each topical section of the Draft EIR, the project-specific impacts of the proposed landfill expansion would not be significant. As discussed in Section 3.8.4 of the Draft EIR, the proposed project would not alter the quality of life along Highway 126 because only minimal development is anticipated within the greenbelt between Santa Paula and Fillmore. Cumulative, nonproject-related noise and traffic impacts, which could potentially affect the rural character of the region, would be due to regional growth and increased use of Highway 126 as a transportation corridor, and would not be significantly increased by the proposed project.

Response 17-12

1. It is unclear as to what the commenter specifically finds "...vague..." with regard to mitigation measures in the Draft EIR for water resources and nuisance issues. Environmental protection and monitoring would be part of the proposed project, as described in Section 2.6.4 of the Draft EIR. In addition, specific operational procedures and regulatory requirements, and

mitigation measures were included in the Draft EIR for these topics to assure that potential impacts remain below a level of significance (see Sections 3.3.5 and 3.3.6 for water resources; Sections 3.14.5 and 3.14.6 for nuisance issues).

2. Birds were analyzed with regard to nuisance in Section 3.14 of the Draft EIR based on the potential impacts of the proposed project, not the existing operations at Toland. As stated in Section 3.14.3.1.1 of the Draft EIR, birds are not expected to represent a nuisance, as Toland would be operated in compliance with CCR Title 14, including the following operational procedures (see Section 3.14.5 of the Draft EIR) that are known to be effective in minimizing birds at landfills:
 - Compaction of waste at the active working face.
 - Periodic 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.
 - The working face would be kept as small as safely practicable, given the type of and number of landfill equipment working there.
 - An active litter control program.

3. As discussed in Section 3.14.3.1.1 of the Draft EIR, in the event birds are determined to be a nuisance at Toland, additional measures would be implemented and may include, but not be limited to, the use of an overhead nylon line grid system (bird wires), distress tapes, propane cannons, and/or habitat manipulation/modification. The effectiveness of these measures would be monitored and, if found not to be effective, additional measures would be developed. To formalize this requirement, a mitigation measure has been included in this Final EIR regarding the use of additional measures in the event birds are determined to be a nuisance at Toland. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 17-13

1. Section 2.6 of the Draft EIR provides a description of the phased closure of Toland and the postclosure monitoring and maintenance activities that are anticipated as part of the proposed project. In addition, the potential site specific impacts associated with closure and postclosure of Toland are addressed in each topical area in Chapter 3.0 of the Draft EIR.

Response 17-14

1. Sufficient geologic and geotechnical investigations and analyses have been performed to characterize the site and to determine if geologic conditions at the site could represent a significant impact to the proposed project. Information from pertinent investigations, analyses and references regarding the geologic conditions at the site were analyzed and used to support the findings included in Section 3.2 of the Draft EIR. Chapter 6.0 lists the various regional and site specific geologic reports and investigations referenced in Section 3.2 of the Draft EIR. Table 6.1 of the Draft EIR lists specific technical reports prepared to support the Draft EIR and includes the *Focused Geologic Investigation* report (Environmental Solutions, Inc., 1995a) and *Faulting and Seismicity Technical Report* (Environmental Solutions, Inc., 1995b) prepared for the proposed project. These technical reports were prepared for the proposed project, are incorporated by reference into the EIR, and are part of the administrative record for the project.

2. The *Focused Geologic Investigation* report includes the results of detailed geologic trenching to investigate and define a bedrock feature identified by Fugro West, Inc. (Fugro, 1992). In conjunction with the extensive geologic trenching accomplished by Fugro (Fugro, 1992), the *Focused Geologic Investigation* of Toland found that Holocene age faults are not present within 200 feet of the footprint of the proposed project and, therefore, the proposed project meets the landfill site criteria regarding Holocene age faults included in CCR Title 23, Chapter 15 (Environmental Solutions, Inc., 1995a).

3. Regarding the landslides, mud flows, and debris flows at the site, based on the geologic trenching conducted at the site, these features are surficial in nature and are not deep seated (Fugro, 1992; Environmental Solutions, Inc., 1995a). These surficial features would be excavated as part of the proposed project. As Toland is a canyon landfill, infilling the canyon area with waste would buttress the slopes against future failure. The geologic investigations at the site have determined that these existing surficial features would not represent a geologic hazard to the proposed project, nor would the proposed project result in geologic hazards. Since the detailed design of the proposed project has not been completed however, a mitigation measure was included in Section 3.2.7 of the Draft EIR to require a slope or foundation stability report be prepared for the final design. The inclusion of this mitigation measure does not defer detailed geologic investigations until excavation as suggested by this comment.

4. The *Faulting and Seismicity Technical Report* prepared for the proposed project includes a detailed discussion of the following:
 - Project area and project site specific tectonic setting.

- Project area and project site specific faulting and seismicity, including identification of the near-field and far-field controlling faults for the site.
 - Project area and project site seismic hazards.
 - Slope stability and landfill deformation analyses for the proposed project, including static stability analyses, pseudo-static stability analyses, one-dimensional dynamic site response analyses, and seismically-induced deformation analyses.
5. As detailed in the *Faulting and Seismicity Technical Report*, and as summarized in Section 3.2 of the Draft EIR, the seismic analyses conducted for the proposed project were based on data for faults within a 100 kilometer radius of the site. This radius was selected to include the potential effects of major near-field faults (e.g., San Cayetano and Oak Ridge) and regional far-field faults (e.g., San Andreas, White Wolf, Sierra Madre-San Fernando, and Newport-Inglewood). The data for the analyses include recent publications on faulting and seismic activity in the Ventura and Los Angeles basins, including published data regarding the January 1994 Northridge earthquake. The seismic analyses conducted for the proposed project were based on a probabilistic analysis to determine the site-specific peak ground acceleration (PGA) for the 100-year and 2,400-year return period ground motion as required by CCR Title 23 and Subtitle D, respectively, and were based on the maximum potential earthquake (MPE) for the faults within the 100-kilometer radius.
6. As discussed in Section 3.2 of the Draft EIR, the analyses conducted for the proposed project determined that a PGA of 1.0g from the MPE could affect the site. The analyses also determined that the proposed design for the expansion of Toland (i.e., excavation and fill plans, and base liner system) would result in stable landfill slopes under static and seismic conditions (Environmental Solutions, Inc., 1995b).
7. The *Faulting and Seismicity Technical Report* concluded that the preliminary design for the proposed project would be stable for the 100-year and 2,400-year return period ground motion from the MPE. It also indicated that further evaluation of the landfill slope and base liner system could be accomplished during the detailed design phase of the project to allow for refinement and optimization of the project design. Depending on the requirements of VRSD, the additional evaluations could include three-dimensional static and pseudo-static slope stability analyses, and two-dimensional dynamic response analyses. While the additional studies could refine the design of the proposed project, they would not result in a change in the findings of the analyses. Based on the analysis, the preliminary design of the proposed project would be stable for a PGA of 1.0g based on the MPE that could affect the site (Environmental Solutions, Inc., 1995b).

8. Since the detailed design of the proposed project has not been completed, a mitigation measure was included in Section 3.2.7 of the Draft EIR to require a slope or foundation stability report be prepared for the final design. The inclusion of this mitigation measure does not defer detailed geologic investigations until excavation as suggested by this comment. As discussed above, detailed geologic investigations, including detailed seismic analyses have been accomplished to support the preparation of the Draft EIR.

Response 17-15

1. The biological survey was conducted according to accepted methods by a biologist included on a list of qualified consultants provided by the County of Ventura. Specific responses to comments from Impact Sciences are included in Responses 17-18 through 17-84.

Response 17-16

1. The Draft EIR does not rely on existing operating conditions to conclude that the proposed project would be compatible with surrounding agricultural uses. Section 3.8.3.2.2 of the Draft EIR includes a technical analysis of potential project impacts on agriculture, including possible impacts on frost, the impact of increased fugitive dust, and the potential increase in pests. It is important to note that the proposed project would not result in existing or potential agricultural lands being taken out of production.
2. The conclusions of the analysis are supported by analyses conducted for the EIR, and the experience at other landfills which are located in proximity to agricultural operations. The analysis and conclusions are appropriately disclosed in the Draft EIR.

Response 17-17

1. As discussed in Section 3.9 of the Draft EIR, the methodology for determining the proposed project's level of impact associated with visual resources was based on identification of landfill-sensitive viewsheds. For land uses from which the proposed project could potentially be visible, the determination of significance was based on the extent to which the landform alterations would disturb vegetation, natural appearance, and topography within the viewshed. As noted in Section 3.9.3 of the Draft EIR, significance criteria was taken from Appendix G of the CEQA Guidelines and the County's Initial Study Assessment Guidelines (County, 1992a).

2. As discussed in Section 3.9.3 of the Draft EIR, the proposed project would not result in a significant impact based on the analyses in Draft EIR Figures 3.9.3 through 3.9.5, and significance criteria. It was demonstrated that visual impacts would not be significant, due to the mountainous character of the surrounding topography, and the screening of the landfill by vegetation and orchards.

Response 17-18

1. As noted by this comment, Section 1.2.2 of the Draft EIR indicates that AB 939 requires counties to demonstrate 15 years of landfill capacity. As further discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion program implemented under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County only has nine years of remaining landfill capacity (County, 1995a). Since the County cannot demonstrate 15 years of landfill capacity, the Draft EIR did not, as suggested by this comment, rely on "General statewide studies on the need for additional landfill capacity..." to justify the project. Rather, as discussed in Section 1.2.2.2 of the Draft EIR, based on the County only having nine years of landfill capacity remaining, VRSD proposes to expand Toland to meet a portion of the long-term landfill capacity requirements of the County.

Response 17-19

1. The statement made in Section 1.2.2.2 of the Draft EIR regarding VRSD proposing to "...expand Toland to meet a portion of the long-term landfill capacity requirements for the County, thereby avoiding the environmental impacts associated with the development of a new landfill," is based on the alternatives analyzed in Chapter 4.0 of the Draft EIR. None of the alternatives evaluated would eliminate or reduce the significant impacts associated with the proposed project at Toland. In fact, as noted in Chapter 4.0 of the Draft EIR, the alternatives would have similar or greater environmental impacts than the proposed project.
2. This comment is incorrect in stating that the Draft EIR concludes that the proposed project would not result in impacts. As summarized in Section 1.3.2 of the Draft EIR and as discussed in detail in Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.

- Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.
3. CEQA requires state and local government agencies to consider the environmental consequences of projects over which they have discretionary authority, prior to taking action on those projects. Whether this is considered a new project or an expansion of an existing land use, the environmental process is the same. Under either scenario, an EIR is required to evaluate and disclose the potential environmental impacts of the proposed project.

Response 17-20

1. Section 3.1.1 of the Draft EIR provided an overview of the environmental setting of the project area. Subsequent sections of Chapter 3.0 of the Draft EIR (i.e., Sections 3.2 through 3.15) provided a detailed description of the environmental setting (including the regional setting), which focused on the specific topic being discussed.
2. Quality of life is subjective, based on a combination of many separate factors (e.g., visual character, surrounding land use, noise, traffic, etc.). These factors have been addressed individually in Sections 3.2 through 3.15 of the Draft EIR.

Response 17-21

1. The proposed project was analyzed based on the point in the life of the project when potential impacts are anticipated to be the greatest, near the end of operations. At this time, issues such as air, traffic, etc. would have increased due to normal growth in the County. The comment incorrectly paraphrases the definitions that were included in the Draft EIR with regard to timeframes. Short-term was defined as temporary (i.e., construction activities associated with the beginning of the proposed project) and long-term as relatively permanent. This statement was included to provide the reader with a frame of reference regarding the types of potential impacts that could occur with the proposed project. It is not required to analyze the proposed project phase by phase, as each phase would involve the same type of operations and potential impacts.

Response 17-22

1. The statement on page 3.1-3 of the Draft EIR regarding the feasibility of mitigation measures, was included to eliminate the need for a separate statement within each resource section. Mitigation measures were analyzed for feasibility before including them in each resource section of Chapter 3.0 of the Draft EIR.

Response 17-23

1. In accordance with CEQA Guidelines Section 15130 (b)(1)(B), "a summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or areawide conditions" is one of the elements identified as necessary for an adequate discussion of cumulative impacts. The existing greenbelt agreements in the County provide a statutory basis for large-lot zoning through the Local Agency Formation Commission (LAFCO) to prevent urban encroachment (LAFCO, 1995). The discussion of greenbelts in the Draft EIR is not "...an excuse not to address cumulative growth..." as suggested by this comment, rather it is included as a relevant land use policy for the region in accordance with CEQA.
2. As discussed in Section 3.11.4.1 of the Draft EIR, an identification of specific projects which would generate future traffic would not be particularly meaningful in projecting overall, future Highway 126 traffic in the project vicinity. The analysis, was therefore based on traffic projections for 2015 provided by Caltrans. The 79 percent expected increase conservatively represents growth in adjacent areas as well as increases in through traffic.

Response 17-24

1. As discussed in Section 3.2.2.6 of the Draft EIR, while expansive soils have been identified at the site, these soils would be excavated during site development and would be used as cover material and/or engineered fill at the landfill. It is important to note that during the excavation and grading process, soils would be mixed resulting in a homogeneous soil type prior to use as daily or intermediate cover material or engineered fill. When expansive soils are excavated and become part of the mixed soil type, expansive index tests would be performed to verify the suitability of the material for use as cover and/or fill material.
2. A mitigation measure has been included in the Final EIR regarding the verification of material suitability through the use of expansive index testing. The inclusion of this mitigation

measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 17-25

1. The County General Plan includes goals and policies for the management of mineral resources and designates specific areas in the County as Mineral Resource Areas on the Resource Protection Map. A review of this map shows that Toland is not located in a designated mineral resource area. Regarding clay as a designated mineral resource in the County, the Resource Appendix of the County General Plan designates only two areas in the County as mineral resource areas based on the presence of clay. The areas are in the Lockwood Valley and Frazier Mountain and contain what is referred to by the County as "Lockwood Clay."
2. Based on the County General Plan, the low permeability soil contained in the Pico Formation at Toland is not designated as a mineral resource. Therefore, as discussed in Section 3.2.2.5 of the Draft EIR, the proposed project would not make a mineral resource designated by the County inaccessible.

Response 17-26

1. The determination included in Section 3.2.2.6 of the Draft EIR regarding settlement and subsidence of underlying materials is based on the preliminary design of the proposed project that results in excavation of the underlying soils to bedrock (i.e., the Pico and Las Posas Sand components of the Fernando Formation). As the bedrock formations consists of sedimentary ancient marine deposits, they are fully consolidated and are not subject to settlement or subsidence from the additional overburden of waste from the proposed project.

Response 17-27

1. See Response 17-14 above.

Response 17-28

1. As discussed in Section 3.2.2.7 of the Draft EIR, a focused geologic investigation was conducted to investigate and define the Pico Formation bedrock feature identified by Fugro in 1992 (Environmental Solutions, Inc., 1995a). Based on the combined geologic trenching

conducted by Fugro (1992) and Environmental Solutions, Inc., it has been determined that the bedrock feature identified by Fugro was an isolated feature as it could not be relocated after excavating a number of new trenches along the trend of the feature. This finding is significant as it means the feature was limited in size and did not continue along a geologic trend. In addition, it was also determined that the terrace deposits that overlay the Pico Formation in which the feature was located predates the Holocene age.

2. Regarding the use of the earthquake database EQSEARCH (Ver. 2.01, Blake, 1989), this database has been continuously updated by Blake and others. As shown in Figure 3.2.6 of the Draft EIR, the database and the analysis in the Draft EIR included data from the January 1994 Northridge earthquake. Regarding the inclusion of detailed seismic data in Section 3.2.2.8 or Section 3.2.3.1.1 of the Draft EIR, this is an issue regarding the organization of the EIR rather than a technical issue.
3. Also see Response 17-14 above.

Response 17-29

1. See Responses 17-14 and 17-24 above.

Response 17-30

1. As detailed in the *Faulting and Seismicity Technical Report* for the proposed project (Environmental Solutions, Inc., 1995b), the primary geologic and seismic regulatory requirements are contained in the California Code of Regulations (CCR) Title 23, Chapter 15, and Title 14, Chapter 3, and 40 Code of Federal Regulations (CFR), Subtitle D, Part 258 of the Resource Conservation and Recovery Act (Subtitle D).
2. CCR Title 14, Chapter 3, Article 7.8 states that the:
 - "Maximum expected horizontal acceleration in rock at the site should be determined for the Maximum Probable Earthquake (MPE)," as defined in California Division of Mines and Geology (CDMG) Note 43 (1975).

Federal regulations (CFR Part 258.14) for seismic design of municipal solid waste landfill facilities specify that:

- "Owners or operators of new MSWLF units or lateral expansions located in a seismic impact zone to design the unit to resist the maximum horizontal acceleration in lithified material for the site."

3. In addition to the regulatory requirement to consider peak horizontal acceleration, the state of practice in seismic design of landfills does not require incorporation of vertical acceleration component within the pseudo-dynamic slope stability analyses. This is also the accepted and common approach used by the RWQCB and the California Department of Water Resources (DWR) in seismic evaluation of landfills and dams. This is most likely because the higher frequency vertical acceleration pulses are generally not in phase with the larger and lower frequency horizontal acceleration pulses, and may cause an increase rather than a decrease in stability at those moments when the horizontal acceleration is peaking. Therefore, the calculation of the peak vertical acceleration is not required for the proposed landfill.

Response 17-31

1. The *Faulting and Seismicity Technical Report* concluded that the preliminary design for the proposed project would be stable for the 100-year and 2,400-year return period ground motion from the MPE. It also indicated that further evaluation of the landfill slope and base liner system could be accomplished during the detailed design phase of the project to allow for refinement and optimization of the project design. Depending on the requirements of VRSD, the additional evaluations could include three-dimensional static and pseudo-static slope stability analyses, and two-dimensional dynamic response analyses. While the additional studies could refine the design of the proposed project, they would not result in a change in the findings of the analyses. Based on the analysis, the preliminary design of the proposed project would be stable for a PGA of 1.0g based on the MPE that could affect the site (Environmental Solutions, Inc., 1995b).
2. Since the detailed design of the proposed project has not been completed, a mitigation measure was included in Section 3.2.7 of the Draft EIR to require a slope or foundation stability report be prepared for the final design. The inclusion of this mitigation measure does not defer detailed geologic investigations until excavation as suggested by this comment. As discussed above, detailed geologic investigations, including detailed seismic analyses have been accomplished to support the preparation of the Draft EIR.

Response 17-32

1. VRSD has a signed agreement with the Rio Plaza Water Company in El Rio to allow VRSD to purchase water at the company's site and transport the water to Toland by truck. A copy of this agreement is included in Appendix E of this Final EIR.

2. The offsite well located south of Toland Park has been completed and it draws water from the Saugus Formation. As discussed in Section 3.3.2.1.1 of the Draft EIR, the Saugus Formation consists of crudely bedded alluvial conglomerate that is the primary aquifer for ground water of the Santa Paula-Sespe Basin. The well has a capacity of 500 gpm. The proposed project would require 30-acre feet per year of water to meet its requirements for nonpotable water. The owner of this well has agreed to provide VRSD the water required for the proposed project.
3. Regarding a proposed new well on VRSD's 53-acre parcel, this area also is situated in the Saugus Formation. No specific feasibility study has been completed for this well and it is considered speculative.
4. Of the three sources for nonpotable water, the agreement with the Rio Plaza Water Company was the only demonstrated source at the time the Draft EIR was prepared. It is for this reason that the traffic, noise and air quality analysis in the Draft EIR included the impacts associated with delivery of water from El Rio by truck. In the event, however, that either the new well south of Toland Park or the proposed new well on VRSD property are used to supply water for the proposed project, a revised mitigation measure is included in Table 1.1 of the Final EIR requiring VRSD to offset the water withdrawn by these wells by reducing water usage at the Bailard and Coastal landfills to mitigate the project's contribution to overdraft of the Oxnard Plain.

Response 17-33

1. The ongoing overdraft of the Oxnard Plain due to agricultural and municipal use in the Oxnard and Ventura area, and is considered to be a significant cumulative impact. The proposed project's contribution to this overdraft, however, is considered incremental for the following reasons as stated in Section 3.3.3.1.2 of the Draft EIR:
 - The Santa Paula-Sespe Basin is not in overdraft and the proposed project's use of 30-acre feet from this basin would not cause an overdraft situation. The 30-acre feet proposed to be used at Toland represents only an insignificant fraction of the water withdrawn from the Santa Paula-Sespe Basin for agricultural and domestic use.
 - Outflow from the Santa Paula-Sespe Basin contributes to the Oxnard Plain via the Oxnard Plain Forebay Basin. The amount of outflow from the Santa Paula-Sespe Basin to the Oxnard Plain, however is subject to seasonal fluctuation, and is dependent on the amount of rainfall and evaporation.

During the summer months, the period of highest onsite water usage at Toland, as little as 10 percent of the ground water in the Santa Paula-

Sespe Basin may outflow to the Oxnard Plain. During the winter months, the period of lowest onsite water usage at Toland, upwards of 90 percent of the ground water in the Santa Paula-Sespe Basin may outflow to the Oxnard Plain.

Therefore, during the period of highest water use at Toland (i.e., the summer months) the Santa Paula-Sespe Basin provides only minor outflow to the Oxnard Plain. Due to the minor outflow from the basin and the limited amount of water used by the proposed project in comparison to other users of the Santa Paula-Sespe Basin, the proposed project's contribution is incremental as discussed in the Draft EIR.

2. Notwithstanding the proposed project's incremental contribution to the overdraft condition of the Oxnard Plain, a revised mitigation measure is included in Table 1.1 of this Final EIR to offset the 30-acre feet of water required for the proposed project through the reduction of water usage at VRSD's Bailard and Coastal landfills. The mitigation measure recognizes the requirement that the proposed project should not contribute to the current overdraft of the Oxnard Plain, and provides a feasible and effective mechanism to offset the water used by the proposed project.
3. Whether the proposed project's contribution to the overdraft of the Oxnard Plain is termed incremental, the Draft EIR includes a mitigation measure to offset the proposed project's contribution.

Response 17-34

1. Comment noted. See the following for specific responses regarding sensitive species.

Response 17-35

1. It is noted that two subspecies comprise this species in the region and in addition to the San Diego horned lizard (*Phrynosoma coronatum blainvillei*), the California horned lizard (*Phrynosoma coronatum frontale*) may also potentially occur onsite. While neither species, was observed during the biological survey, there is suitable habitat scattered onsite with the greatest potential for occurrence of these species on the sandy stream terraces and sandy active channel of O'Leary Creek, as well as the interface between ruderal grassland and coastal sage scrub.
2. As discussed in Section 3.4.3.1.3 of the Draft EIR, should these species occur onsite, the primary suitable habitat is along O'Leary Creek, which would not be affected by the proposed

project. In addition, the proposed project results in disturbance of only a limited number of acres, and there is considerable suitable habitat adjacent to the project site and in the project area.

3. As stated in Section 3.4.3 of the Draft EIR, Appendix G of the CEQA Guidelines indicates that impacts to wildlife would be considered significant if they could:
- Substantially affect a threatened or endangered species or its habitat.
 - Substantially diminish habitat for wildlife.
 - Create a potential hazard to wildlife populations in the area through the use or disposal of materials.
 - Substantially interfere with the movement of resident or migratory fish or wildlife species.

As neither species is listed as threatened or endangered, and as the proposed project would not "substantially" diminish habitat suitable for the species, based on the criteria above, the proposed project would not result in significant impacts to these species.

4. Table 3.4.3 of the Draft EIR has been revised to reflect this additional information and is included in Section 3.2 of this Final EIR. The additional information does not alter the findings or conclusions of the EIR.

Response 17-36

1. As discussed in Section 3.4.2.3.2 of the Draft EIR, although suitable habitat for the coastal whiptail lizard occurs onsite, no individuals were observed during the biological survey (see Section 3.4.3.1.3 of the Draft EIR). Should the species occur onsite, the primary suitable habitat would be coastal sage scrub. As discussed in Section 3.4.3.1.3 of the Draft EIR, the proposed project results in disturbances of only a limited number of acres of coastal sage scrub and there is considerable coastal sage scrub in the vicinity of the project area.
2. As stated in Section 3.4.3 of the Draft EIR, Appendix G of the CEQA Guidelines indicates that impacts to wildlife could be considered significant if they could:
- Substantially affect a threatened or endangered species or its habitat.
 - Substantially diminish habitat for wildlife.
 - Create a potential hazard to wildlife populations in the area through the use or disposal of materials.
 - Substantially interfere with the movement of resident or migratory fish or wildlife species.

As the species is not listed as threatened or endangered, and as the proposed project would not "substantially" diminish habitat suitable for the species, based on the criteria above, the proposed project would not result in significant impacts to the species.

Response 17-37

1. The comment is correct in noting that three sensitive bird species not included in the description of sensitive species in Section 3.4 of the Draft EIR may use the project area to forage. These species are as follows:
 - Tricolored blackbird (*Agelaius tricolor*) - a federal Category 2 species and California species of special concern.
 - Sharp-shinned hawk (*Accipiter straitus*) - a California species of special concern.
 - Vaux's swift (*Chaetura vauxi*) - a California species of special concern.
2. The sharp-shinned hawk and Vaux's swift have the highest potential to occur onsite, although the only sensitive bird species noted during the biological survey was Cooper's hawk (*Accipiter cooperi*) (see Section 3.4.3.1.3 of the Draft EIR). No other sensitive bird species were observed. As stated in Section 3.4.3.1.3 of the Draft EIR, potential impacts to bird species are not considered significant, because of the limited number of acres that would be disturbed and the availability of similar habitat in the vicinity of the proposed project. In addition, habitat would be restored during the phased closure of the landfill.
3. This comment does not provide information regarding the additional sensitive bird species that could potentially occur or fly by the project site. Any number of bird species could potentially fly by the site, but there is no indication that the proposed project would have a direct or indirect impact to such species.
4. Table 3.4.3 of the Draft EIR has been revised to include the three additional sensitive bird species and is included in Section 3.2 of this document. The additional information does not alter the findings or conclusions of the EIR.

Response 17-38

1. The comment is correct in noting that Townsend's big-eared bat (*Plecotus townsendii*), which is expected to occur in the project area was not included in the discussion of sensitive species in Section 3.4 of the Draft EIR. Although the Pacific western big-eared bat (*Plecotus townsendii*) was included in the discussion of sensitive species in the Draft EIR (see Section 3.4.2.3.2). This is a subspecies of *Plecotus townsendii* which is more likely to occur in the project area.

2. The four additional bat species noted by the comment as being sensitive and not included in the Draft EIR, were not included on the California Natural Diversity Data Base (CDFG, 1995) used for the biological study. They are federal Category 2 species and include:

- Yuma myotis (*Myotis yumanensis*).
- Long-eared myotis (*Myotis evotis*).
- Long-legged myotis (*Myotis volans*).
- Fringed myotis (*Myotis thysanodes*).

Subsequent to the biological study for the proposed project, the list of sensitive species was updated, and is expected to be released the early part of 1996. Notwithstanding the change in status of these species, these species were not observed during the biological survey, and potential impacts are not considered significant, because suitable roosting habitat is not available onsite.

3. Table 3.4.3 of the Draft EIR has been revised to reflect the additional information and is included in Section 3.2 of this document. The changes to the table do not alter the findings or conclusions of the EIR.

Response 17-39

1. Wildlife surveys were completed for the Draft EIR according to the standards of the California Department of Fish and Game by a qualified biologist. As discussed in Section 3.4.3.1.3 of the Draft EIR, suitable roosting habitat for bats was not located within the project site and no individuals were observed during the field survey. There is no evidence to indicate that sensitive bat species inhabit the site, and no further surveys are required, due to the lack of suitable roosting. As discussed in Section 3.4.3.1.3 of the Draft EIR, the proposed project would not have a significant impact on bat species or habitat.

Response 17-40

1. As discussed in Section 3.4 of the Draft EIR, only a limited amount of potential habitat is available onsite for the Los Angeles pocket mouse (*Perognathus longimembris brevinasus*) and it was not observed during the biological survey. Should the species occur onsite, the primary suitable habitat would be coastal sage scrub and ruderal grasslands. As discussed in Section 3.4.3.1.3 of the Draft EIR, the proposed project results in disturbances of only a limited number of acres of coastal sage scrub and there is considerable coastal sage scrub in the vicinity of the property site.

2. As stated in Section 3.4.3 of the Draft EIR, Appendix G of the CEQA Guidelines indicates that impacts to wildlife could be considered significant if they could:

- Substantially affect a threatened or endangered species or its habitat.
- Substantially diminish habitat for wildlife.
- Create a potential hazard to wildlife populations in the area through the use or disposal of materials.
- Substantially interfere with the movement of resident or migratory fish or wildlife species.

As the species is not listed as threatened or endangered, and as the proposed project would not "substantially" diminish habitat suitable for the species, based on the criteria above, the proposed project would not result in significant impacts to the species.

Response 17-41

1. As discussed in Section 3.4.3.1.3 of the Draft EIR, the proposed project would disturb only 2.7 acres of the coastal sage scrub community that provides potential habitat for the desert woodrat (*Neotoma lepida*). Should the species occur onsite, the primary suitable habitat would be coastal sage scrub. As discussed in Section 3.4.3.1.3 of the Draft EIR, the proposed project results in disturbances of only a limited number of acres of coastal sage scrub and there is considerable coastal sage scrub in the vicinity of the property site.

2. As stated in Section 3.4.3 of the Draft EIR, Appendix G of the CEQA Guidelines indicates that impacts to wildlife could be considered significant if they could:

- Substantially affect a threatened or endangered species or its habitat.
- Substantially diminish habitat for wildlife.
- Create a potential hazard to wildlife populations in the area through the use or disposal of materials.
- Substantially interfere with the movement of resident or migratory fish or wildlife species.

As the species is not listed as threatened or endangered, and the desert woodrat is widely distributed throughout the coastal slope of southern California, the proposed project would not "substantially" diminish habitat suitable for the species. Based on the criteria above, the proposed project would not result in significant impacts to the species.

Response 17-42

1. Wildlife surveys were completed for the Draft EIR according to accepted standards by a qualified biologist. As discussed in Section 3.4.2.3.2 of the Draft EIR, the only potentially

suitable habitat for the San Diego black-tailed hare (*Lepus californicus bennetti*) is within the level stream portions of O'Leary Creek. No construction or operations activities are planned for areas along the O'Leary Creek corridor. Therefore, no significant impacts are expected, and no additional studies are required.

Response 17-43

1. Plant surveys were conducted for the Draft EIR according to accepted standards by a qualified botanist. The biological study listed five sensitive plant species, based on known occurrences in the vicinity, as well as the presence of suitable habitat onsite (Hunt, 1995). As discussed in Section 3.4.3.1.2 of the Draft EIR, only two sensitive plant species have the potential to occur in the project area. It is unclear as to what additional sensitive plant species are referred to by the comment. No sensitive species were observed during the survey. Therefore, no significant impacts are expected, and there is no evidence to indicate that further studies are required.
2. Most of the project site has been disturbed by human factors. The site property outside of the actual landfill is comprised of naturally disturbed areas, nonnative grasslands, and dense stands of coastal sage scrub. Given the amount of nonnative vegetation onsite and in the vicinity of the site (from grading, agriculture, etc.), the potential impacts to less than three acres of undisturbed vegetation would not be significant.

Response 17-44

1. A "...complete understanding of their presence or absence [sensitive species]" as suggested by the comment is not possible. As discussed in the responses above, biological surveys were completed according to accepted standards by qualified personnel. Evidence of only two sensitive species was observed (Cooper's hawk and desert woodrat) during the surveys, and it was determined that there would be no significant impacts to these species (see Section 3.4.3.1 of the Draft EIR).
2. Potential impacts with regard to vectors were discussed in Section 3.14 of the Draft EIR. Operational procedures and regulatory requirements discussed in Section 3.14.5 of the Draft EIR (i.e., use of daily cover, etc.) would reduce the potential nuisance of vectors and birds to below a level of significance.

Response 17-45

1. See Response 17-39 above.

Response 17-46

1. Neither the California gnatcatcher (*Polioptila californica californica*) nor the California condor (*Gymnogyps californianus*) were observed or are expected to occur within the project site (Hunt, 1995; CDFG, 1995). There is uncertainty as to whether the California gnatcatcher historically occurred north of the Santa Clara Valley. Further, it is unlikely that this species occurs within the vicinity of the project site.
2. The California condor is unlikely to occur in the area since the U.S. Fish and Wildlife Service has: (1) stopped releasing condors in Ventura County; (2) recaptured previously released birds; and (3) is now pursuing a release program only in northern Santa Barbara County.
3. Therefore, no additional biological surveys are required.

Response 17-47

1. See the responses above regarding the specific comments on the potential impacts to sensitive species.

Response 17-48

1. It is recognized that landfill operations would increase from 8 hours per day to 13.5 hours per day under the proposed project (see Section 3.4.3.1.4 of the Draft EIR). This would include a seasonal increase in the use of lighting for landfill activities associated with the scales, operations and maintenance center, and working face. Lighting at these areas would be required during early morning (as early as 6:00 a.m.) and early evening (as late as 7:00 p.m.) operations, six days a week, during months when daylight savings time is not in effect (November through April). This is not considered a significant impact to wildlife, as lighting would be shielded and directed onto specific areas of the landfill, and only required seasonally.
2. Section 3.4.3.1.3 of the Draft EIR discussed the potential impacts, specifically with regard to bat species. This impact is expected to be minimal, based on the fact that no suitable habitat

occurs onsite, and operational procedures would reduce potential impacts to early morning and early evening foraging activities to below a level of significance.

Response 17-49

1. No alteration in drainage patterns or dewatering would occur under the proposed project to impact the seeps. Therefore, there will be no direct or indirect impacts to the seeps.
2. Given the amount of nonnative vegetation onsite and in the vicinity of the site (from grazing, agriculture, etc.), it is unclear as to the concerns expressed in the comment regarding invasion of nonnative species. As stated in the Draft EIR, less than 3 acres of undisturbed vegetation would be disturbed under the proposed project.

Response 17-50

1. The comment is correct that vegetation used for closure would not have deep roots, as that would interfere with the integrity of the landfill final cover. That does not mean, however, that quality wildlife habitat would not be established. As discussed in Section 3.4.3.2 of the Draft EIR, revegetation would consist of herbaceous annuals, perennials, and woody ground cover that would retain and, to the degree possible, enhance wildlife values of the area, particularly for the approximately 53 acres of the project site that are currently barren. Plant species used in revegetation will be detailed in the landscaping/revegetation plans. These plans would be developed during the permitting and design phase of the proposed project.
2. The determination that impacts to wildlife habitat would not be significant was based on: (1) the small amount of undisturbed (less than 3 acres) and previously disturbed (17 acres) habitat that would be affected by the proposed project; (2) these activities occurring over an approximate 31-year period; and (3) revegetation of the proposed project site.

Response 17-51

1. The phased development and revegetation of the landfill is part of the project design and not a mitigation measure. It was not the intention to confuse the commenter, although the phased development and revegetation does reduce impacts to wildlife habitat to less than significant.

Response 17-52

1. See Response 17-49 above for specific responses regarding impacts to the riparian corridors and seeps.

Response 17-53

1. As stated above, biological surveys were completed according to accepted methods by qualified personnel. No additional surveys are required. See the above responses regarding specific comments on sensitive species.

Response 17-54

1. See Response 17-53 above.

Response 17-55

1. The site property outside of the active landfill is comprised of naturally-disturbed areas, nonnative grasslands, and dense stands of coastal sage scrub vegetation. Most of the proposed project site has been disturbed by human factors. Ornamental and nonnative trees are common in the southern portions of the project site. As discussed in Section 3.8 of the Draft EIR, land uses surrounding the site consist of open space and agriculture (i.e., avocado and citrus). Therefore, vegetation that would be used for screening O'Leary Creek is not required to consist of native vegetation. Landscaping/revegetation plans will be developed during the permitting and design phase of the proposed project and will include specific plant species.

Response 17-56

1. The conclusions of potential impacts from the proposed project with regard to biological resources were based on surveys and analyses that were completed according to accepted standards by qualified personnel. See the responses above for specific comments on biological resources.

Response 17-57

1. It is not the role of the project proponent to provide a detailed evaluation of County General Plan consistency within the EIR. Sections 3.8.1.1.1 and 3.8.3.1.1 of the Draft EIR discussed the

relationship of the County General Plan's Goals, Policies and Programs to the proposed project and reviewed policies specifically related to solid waste facilities. A thorough analysis of potential project impacts and policies related to resources, hazards, land use, and public facilities are analyzed within the respective topical sections of the Draft EIR. Project analysis has therefore not been deferred. Typically, a review of the proposed project for consistency with the General Plan is conducted by the County in conjunction with processing the CUP.

2. In addition to the public hearing that will be held by VRSD Board of Directors to consider the certification of the EIR for the proposed project, the County Planning Commission and Board of Supervisors will also hold public hearings on the CUP for the proposed project. The County hearing process will provide the public an additional opportunity to comment on the specific County General Plan consistency findings being considered by the County as part of the CUP.

Response 17-58

1. Waste facilities are depicted on the General Plan's Public Facilities Map as a symbol rather than a property boundary. The map, therefore, would not provide the information requested by this comment regarding the application of the designation to the existing or proposed footprint.
2. Textual information regarding Waste Treatment and Disposal Facilities, including Toland, is included in the "Public Facilities and Services Appendix" of the County General Plan. This information is available for public review at the County. CEQA does not require such information to be repeated in its entirety in an EIR (Section 21061 of the Public Resources Code), rather it is appropriate to incorporate publicly available documents by reference into an EIR.

Response 17-59

1. As acknowledged in Section 3.8.3.1.5, it is recognized that some variation in the Toland ranking in comparison to the original site rankings is unavoidable due to individual judgments of the individuals ranking the sites. Since the majority of the ranking criteria are objective in nature, however, the overall ranking was determined to be useful and meaningful. The ranking system, in its entirety from the VRSD Study, is included as Appendix E of the Draft EIR.

Response 17-60

1. The comment is correct in noting that the analyses identified viewpoints, not viewsheds. A viewshed is defined to include the areas from which the proposed landfill can be seen. Based on a visual survey of the area, the three viewpoints identified for the visual analysis were representative of the potentially sensitive locations in which the landfill could be seen. As discussed in Section 3.9.2.2 of the Draft EIR, views of the landfill from surrounding areas are restricted due to the elevation and topographical characteristics of the project site. In addition, surrounding orchards also act as a visual screen.

Response 17-61

1. As discussed in Section 3.9.2.3 of the Draft EIR, Toland is not located within a designated or eligible scenic County or state scenic resource area, scenic corridor, or on a designated or eligible scenic highway. In addition, the proposed project would not be visible from designated or eligible scenic areas or scenic highways.
2. The comment is correct in noting that the County General Plan calls for preservation of significant open views in the County. It is recognized that significant open views exist along Highway 126, however, the proposed project is located in confined canyon and would not obstruct open views in the Santa Clara Valley.

Response 17-62

1. The determination that there would be no significant impacts from the proposed project with regard to visual characteristics was based on the minimal amount of newly disturbed acreage associated with the proposed project, in addition to the project being a continuation of current landfilling activities. The increase in the height of the landfill, was also considered. As demonstrated in Figures 3.9.3 through 3.9.5 of the Draft EIR, the proposed project would not extensively alter the natural appearance of the area. Therefore, impacts with regard to visual characteristics are not considered significant.

Response 17-63

1. Analysis of the visual impacts of the proposed project was completed for Years 15 and 30 (closure) of operations. This took into consideration the impacts at approximately half way through project implementation and at the point when the landfill would be most visible (greatest impact). As demonstrated in Figures 3.9.3 through 3.9.5 of the Draft EIR, the

landfill would not be readily visible at Year 15. The most visible views of the landfill would be at closure. Therefore, it is not necessary to analyze the visual impacts of the proposed project phase by phase.

2. The working face would not be visible from a wide area during Phases III and IV, as landfill activities would be situated such that they face inward, not towards Highway 126. Further, landfill activities would be shielded, due to topographical conditions and surrounding agricultural operations.

Response 17-64

1. The visual simulations provided in Figures 3.9.3 through 3.9.5 of the Draft EIR correctly depict the visual impacts. Figure 3.9.3 of the Draft EIR (Viewpoint No. 1) correctly shows the proposed project at Year 15, revegetated. At that point in time from Viewpoint No. 1, the slope would be revegetated through the proposed phased closure and landfill operations would not be visible. Figure 3.9.5 of the Draft EIR (Viewpoint No. 3) depicts the landfill without revegetation at Year 15. Landfill operations, however, would not be visible from this viewpoint because of the distance to the landfill and the obstructed views through the surrounding orchards.

Response 17-65

1. The conclusion that the proposed project would present a naturalized topographic feature was demonstrated in Figures 3.9.3 through 3.9.5 of the Draft EIR. Landfilling operations would not be visible from throughout the area. The proposed project is located in a confined canyon and most landfill activities that would occur would be obscured, because of the surrounding topography, distance to the landfill from possible viewing areas, and surrounding orchards.

Response 17-66

1. Based on this comment, an additional mitigation measure has been included in the EIR.
 - To the extent practical, disturbed areas shall be regraded to blend with the surrounding terrain.

Detailed phased grading plans would be prepared for Toland and submitted to LEA, CIMWB, and RWQCB as part of the permitting process (see Section 2.6.2 of the Draft EIR). The

inclusion of this mitigation measure in this Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of the Final EIR for the mitigation measures for the proposed project.

Response 17-67

1. As stated in Response 17-55 above, the site property outside of the active landfill is comprised of naturally-disturbed areas, nonnative grasslands, and dense stands of coastal sage scrub vegetation. Landscaping/revegetation plans would be developed during the permitting and design phase of the proposed project and would include specific plant species.

Response 17-68

1. As discussed in Section 3.10.6 of the Draft EIR, the proposed project would not cause project-related noise impact on Highway 126. As discussed in this section of the Draft EIR, the existing and future nonproject traffic-related cumulative noise conditions along Highway 126 in the project vicinity constitute a significant impact. The proposed project's contribution to the traffic-related cumulative noise impact would be a maximum increase of 0.6 dBA under the "worse case" traffic scenario for 2015.
2. It is recognized that the noise impact due to nonproject-related cumulative traffic on Highway 126 extends beyond the vicinity of Toland Road, including the freeway portion of Highway 126 through Santa Paula. Project-related traffic would represent approximately 2.3 percent of the future ADTs on Highway 126 under the "worse case" traffic scenario defined in the Draft EIR and 1.2 percent under the "proposed case." Noise conditions along Highway 126 represent a regional issue and are not the responsibility of VRSD. Mitigation measures for the nonproject-related cumulative noise impacts were, therefore, not proposed as part of the proposed project.
3. With respect to the specific concern of truck noise affecting Fillmore, it should be noted that the proposed project would not generate additional waste truck traffic east of Toland Road, as the number of waste hauling vehicles from areas east of Toland Road as part of the proposed project (e.g., Fillmore) would continue to be the same as current conditions. Therefore, noise levels on Highway 126 east of Toland Road and through Fillmore would not increase due to the proposed project.

Response 17-69

1. As discussed in Response 17-68, the proposed project would not increase traffic on Highway 126 east of Toland Road above existing levels. Intersections east of the Toland Road/Highway 126 intersection would, therefore not be impacted by the proposed project.
2. As discussed in Section 3.11.4.1 of the Draft EIR, under the "worse-case" (i.e., packer trucks) traffic scenario, project-related traffic would represent approximately 2.3 percent of the future ADTs on Highway 126. Under the "proposed case" (i.e., transfer trucks), the project-related traffic would represent 1.2 percent of the future ADTs on Highway 126. The project-related traffic would only affect "through" traffic at Highway 126 intersections other than Toland Road. It would not generate additional turning movements between Santa Paula and Fillmore. Since the project-related through traffic is conservatively included in the projected ADTs for Highway 126, the proposed project would not substantially affect intersections other than Toland Road and Highway 126.

Response 17-70

1. The distribution of project trips by turning movement at the Toland Road/Highway 126 intersection is provided in Figure 3.11.6 of the Draft EIR. The major routes which would be utilized by waste haulers to access Highway 126 would depend on whether waste was transported by packer or transfer trucks. Figure 4.4 of the Draft EIR shows the location of the proposed transfer stations relative to Toland. It is likely that trucks from the Oxnard transfer station would travel north on Highway 101 to the Highway 101/Highway 126 junction, and then proceed easterly along Highway 126 to the Toland Road. The logical route from the Gold Coast Recycling station in Ventura would also be via Highway 101 north to its junction with Highway 126.
2. If waste is not routed through a transfer station and is transported via packer trucks, trips to the landfill would originate within the individual cities and unincorporated areas served by the landfill. Under this scenario, independent haulers would select routes to the landfill, thereby resulting in unlimited variations of the use of regional arterials and local roadways. In terms of the Santa Clara Valley, however, packer trucks hauling waste from the west County would use Highway 126.

Response 17-71

1. This comment is correct in noting that standard peaking factors would not be directly applicable to landfill operations. A peaking factor was, therefore, not utilized in the preparation of the traffic study for the proposed project. Instead, the peak traffic information was determined in consultation with VRSD. Unlike other types of projects, the total number of daily trips is essentially pre-determined based on the total tonnage to be disposed at the landfill and the capacity of the trucks (i.e., approximately 8 tons per truck for packer trucks and 20 tons for transfer trucks). The hourly distribution of vehicle trips was based on VRSD's knowledge of waste haul operations at Bailard. Projected hourly vehicle flows for both the "proposed case" (waste transport by transfer trucks) and the "worse case" (transport by packer trucks) is included in Appendix F of the Draft EIR.

2. As discussed in Section 3.11.3.1.2 of the Draft EIR, the existing 120-foot, left-turn pocket for eastbound traffic on Highway 126 at Toland Road exceeds the minimum length required pursuant to the Caltrans Highway Design Manual (Caltrans, 1995). The Caltrans design standard for left-turn vehicle storage is based on the number of turning vehicles likely to arrive in an average two minute period during the peak hour (Caltrans, 1995). If the number of trucks during the peak hour represent 10 percent or more of the traffic volume, left-turn vehicle storage space for a minimum of one passenger car and one truck should be provided. As shown in Table 3.11.2, trucks average approximately 11.5 percent of the traffic at the Toland Road/Highway 126 intersection. Based on the peak hour estimate for the "worse case" traffic scenario, on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The design standard for the left-turn vehicle storage length would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car).

3. Under the "proposed case" and the use of transfer trucks, during the peak hour a waste truck would arrive at the intersection an average of once every 10 minutes. Based on the longer truck length for transfer vehicles, the required left-turn storage length for the "proposed case" would be 85 feet (60 feet per transfer truck and 25 feet for the passenger car). Based on the Caltrans design standard, therefore, depending on whether packer trucks or transfer trucks are used, the required left-turn pocket length at the intersection of Toland Road and Highway 126 would range between 65 feet and 85 feet. The existing 120-foot left-turn pocket and configuration at this intersection and approach lanes, as shown in Figure 3.11.3 of the Draft EIR, provides waste trucks and other vehicles adequate distance to safely approach the intersection.

Response 17-72

1. The traffic study prepared for the proposed project employed the methodologies recommended by Caltrans for intersection capacity analysis, signal warrants, and highway design. These methodologies have been developed to optimize traffic flow and assure traffic safety. In addition, as part of its review of the Draft EIR and the supporting traffic study for the proposed project, Caltrans independently performed the signal warrant analysis and concurred that signal warrants are not met for the Toland Road/Highway 126 intersection (see Comment Letter 02). Based on its review, Caltrans recommended the installation of an intersection control flashing beacon, intersection lighting, and warning signs. These improvements are included in the EIR as mitigation measures and would mitigate potential traffic-related safety issues at the intersection.
2. Notwithstanding Caltrans' determination that a signal is not required at the intersection of Toland Road and Highway 126, in the event at some time in the future Caltrans decides a signal is required, VRSD has agreed to pay the cost for the signal. While this is not a mitigation measure in terms of CEQA, VRSD would accept a condition to this effect in the CUP for the proposed project.

Response 17-73

1. As discussed in Section 3.11.2.3 of the Draft EIR, the traffic volumes for Santa Clara School reflect actual vehicle counts taken during peak traffic periods for school traffic. The counts were taken between 7:00 a.m. and 9:00 a.m. and between 2:00 p.m. and 3:30 p.m. to represent peak hours for vehicles entering and leaving the school site.

Response 17-74

1. As discussed in Response 17-72 above, the traffic study prepared for the proposed project employed the methodologies recommended by Caltrans for intersection capacity analysis, signal warrants, and highway design. These methodologies have been developed to optimize traffic flow and assure traffic safety. The study approach did not ignore safety concerns associated with trucks queuing up to turn in and out of Toland Road. The LOS analysis for each turning movement takes into account the configuration of the Toland Road/Highway 126 intersection, including acceleration and deceleration lanes, as shown in Figure 3.11.3 of the Draft EIR.

Response 17-75

1. Based on the County General Plan and the designation of the area between Santa Paula and Fillmore as greenbelt, it is reasonable to assume that these areas would remain primarily open space and agricultural (also see Response 17-23 above). As discussed in Section 3.11.4.1 of the Draft EIR, therefore, an identification of specific projects which would generate future traffic would not be meaningful in projecting overall, future Highway 126 traffic in the project vicinity. The analysis, was therefore, based on traffic projections for 2015 provided by Caltrans. The 79 percent expected increase conservatively represents growth in adjacent areas as well as increases in through traffic.
2. The issue regarding the number of intersections which should appropriately be addressed in the project traffic study is addressed in Response 17-69 above.

Response 17-76

1. The significance thresholds for both noise and traffic impacts, as referenced in this comment, are based on applicable County standards (see Sections 3.10.3 and 3.11.3 of the Draft EIR, respectively). In addition, the Draft EIR identified the project's contribution to cumulative impacts for both noise and traffic, although minor and incremental, as constituting a significant impact (see Sections 3.10.4 and 3.11.6 of the Draft EIR).
2. Notwithstanding the significance findings in the Draft EIR (which are consistent with defined County standards), it is important to recognize that it is the County's responsibility to independently review the EIR and to determine appropriate project conditions and suitable findings in relation to the CUP for the proposed project. In accordance with Public Resource Code Section 21081 and CEQA Guidelines Section 15091, these include mandated CEQA findings for projects for which one or more significant environmental effects have been identified. It is also important to note that the County Zoning Ordinance and General Plan findings of consistency are project specific and should not be confused with CEQA findings regarding cumulative impacts.

Response 17-77

1. As noted in the Draft EIR, most (92 percent) of the waste stream (1,385 of the 1,500 tpd) to be handled by the proposed project is already being disposed at Bailard (1,250 tpd) and Toland (135 tpd). The mix of vehicle types, including packer trucks, self-haul trucks, etc.,

are described in Table F.2 in Appendix F of the Draft EIR. Although this mix is analyzed in the Draft EIR for its impacts, the proposed project is expected to utilize transfer trucks, which would reduce the vehicle number from 450 to 210. This decrease in the number of vehicles per day would reduce not only the total road mileage to haul the complete 1,500 tpd of waste to Toland, compared to use of the current mix of vehicle types, but would also reduce the emissions from hot starts, cold starts, hot soaks, and similar nondriving emissions.

Response 17-78

1. The analysis of carbon monoxide (CO) hotspots used the intersection of Toland Road/Highway 126 as that was determined to be the area where potential worse case conditions would exist. With respect to the specific concern of CO hotspots in the cities of Santa Paula and Fillmore, it should be noted that the project would not generate additional waste truck traffic east of Toland Road. Under the worse case (i.e., packer truck) traffic scenario, project-related traffic would only represent approximately 2.3 percent of the future ADTs on Highway 126 (see Section 3.11.4.1 of the Draft EIR).
2. In addition, the proposed project would only contribute to "through" traffic on Highway 126. The "worse case" 2.3 percent increase in ATDs associated with the proposed project would be accommodated within the 79 percent increase in traffic projected by Caltrans for Highway 126 by 2015. The project would, therefore, not substantially affect intersections other than Toland Road and Highway 126, and no CO hotspot analysis is required for other intersections.

Response 17-79

1. As discussed in Response 17-03 above, nuisance issues were evaluated based on the potential impacts of the proposed project, not the current operations at Toland. The existing nuisance conditions at Toland are minimized by procedures and requirements implemented by VRSD, not by the amount of waste that is accepted. The size of the working face under the proposed project would be similar to the current operation at Toland. Daily cover would be applied throughout the day to keep the working face as small as safely feasible.
2. As discussed in Section 3.14 of the Draft EIR, the conclusion that there would be no significant nuisance impacts was based on: (1) analysis of the potential nuisance impacts of the proposed project; and (2) implementation of operational procedures and regulatory requirements, and mitigation measures included in the Draft EIR. Standards for the control of

nuisances at solid waste disposal sites, and for the control of litter along roads and highways is set forth in: CCR Title 14, Division 7, Minimum Standards for Solid Waste Handling and Disposal; County APCD rules and regulations; County General Plan; California Vehicle Code; and by the County Environmental Health Division. These standards apply to all solid waste disposal sites and do not change according to the amount of waste accepted.

Response 17-80

1. There are existing, appropriate measures in force to control litter from both commercial and private waste hauling vehicles. Section 3.14 of the Draft EIR included a detailed discussion of litter control measures along roadways leading to Toland and at the landfill. Litter control measures along roadways leading to the landfill that would be implemented by agencies other than VRSD include the following:
 - Requirements of the California Vehicle Code that vehicles (including waste hauling vehicles) must not litter and must cover their loads.
 - County ordinance requiring commercial waste hauling vehicles to be inspected annually by the County Environmental Health Division to assure that the vehicle meets the minimum standards included in CCR Title 14 relative to leaking and cleanliness.
 - State and County litter control measures enforced by the California Highway Patrol, County Sheriff's Department, and the County Environmental Health Division.

2. The following litter control measures are included as mitigation measures in the Draft EIR and shall be implemented by VRSD:
 - 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 inspections 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.
 - Dispatching litter control teams shall at least weekly, or more frequently if required, to collect litter along the access road, Toland Road, and Highway 126 within one-quarter mile of either side of the intersection with Toland Road.
 - Posting signs at the landfill entrance and scalehouse noting anti-littering laws and the requirement for loads to be properly covered.

3. As stated in Section 3.14 of the Draft EIR, VRSD would take appropriate steps if there is a recurring situation regarding inadequate covering of waste loads by a particular hauler. In response to this comment, a mitigation measure has been included in the EIR to clarify these actions that may include reporting the waste hauler to the LEA (which oversees inspection and

tagging procedures for commercial vehicles) and/or the County Sheriff's Department and California Highway Patrol (which enforce the California Vehicle Code). Violation of the California Vehicle Code is punishable by fines and/or jail.

4. The inclusion of this clarified mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this document for the mitigation measures for the proposed project.
5. Nuisance issues were evaluated based on the potential impacts of the proposed project, not the current operations at Toland. As discussed in Section 3.14 of the Draft EIR, implementation of the litter control program noted above would assure that the proposed operation at Toland does not result in a significant litter impact along the roadways leading to the landfill, and no additional analysis is required.

Response 17-81

1. As stated above, environmental issues, including health and safety in Section 3.15 of the Draft EIR, were evaluated based on the potential impacts of the proposed project, not the current operations at Toland.

Response 17-82

1. The conclusion that there would not be any significant impacts from potential "hot loads" was based on analysis of the proposed project, not the current operations at Toland. The statement regarding the lack of incidents of hot loads from current operations was meant to exemplify the rare nature of such incidents.
2. As discussed in Section 3.15 of the Draft EIR, waste loads entering the landfill would be inspected at the scalehouse and again at the working face prior to the waste being buried. Landfill employees responsible for operations at the scalehouse and the working face are trained regarding the signs of a potential hot load. The number of employees involved in the routine inspections of waste disposal operations as they perform their specific tasks is approximately five to six per shift. These include equipment operators and spotters.
3. As stated in Section 3.15.3.1.1 of the Draft EIR, if a fire from a hot load were to occur, it would likely be small and of short duration, as there is limited available combustible material

at the surface of the landfill. Implementation of operational procedures and regulatory requirements included in Section 3.15.6 of the Draft EIR would reduce potential impacts to less than significant.

Response 17-83

1. Because of the barren nature of the site, fires originating from the site are considered unlikely. Therefore, the height of the landfill will not increase the potential for fires that could originate on the landfill and spread offsite. Uncovered waste would be minimal as the working face would be kept small, and there would be no exposed waste at the end of the day that could catch fire. As stated in Section 3.15 of the Draft EIR, impacts with regard to fires would not be significant.

Response 17-84

1. A comprehensive approach was taken for preparation of the alternatives in the Draft EIR. Alternatives were not rejected during the scoping process as infeasible and each alternative identified through agency and/or public input during scoping was analyzed in the Draft EIR. The Draft EIR does include a specific discussion on the screening process to identify alternatives. The rationale for evaluating one or more alternatives within each category of alternatives (e.g., rail-haul, offsite location, etc.) is included in the respective subsections of Chapter 4.0 of the Draft EIR. For example, Section 4.4.2 of the Draft EIR provides the rationale for focusing on four of the rail-haul project alternatives (Carbon Canyon, Bolo Station, Mesquite Regional, and Eagle Mountain landfills) and eliminating others as less feasible because of location and/or size. Similarly, Section 4.5.3.2 of the Draft EIR discusses the offsite alternative locations eliminated from detailed consideration.
2. The alternatives analysis in Chapter 4.0 of the Draft EIR is comprehensive, objective and meaningful. The Draft EIR evaluated 32 alternatives. The rationale for the alternatives evaluated is included, and the public and responsible agencies have not been denied the opportunity to review and comment on this information. The requirements of CEQA have been met, and there is no reason that the document be circulated for addition review.

**PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND
CLOSURE/POSTCLOSURE**

Submit to VRSD representative at the Public Meeting, or mail or hand deliver, V. R. S. D.
to: Ventura Regional Sanitation District, Attention: District Manager,
1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
hand delivered comments must be received at the above address by 5:00 p.m.
on Monday, November 6, 1995.

Dear District Manager,

I am the principal at Santa Clara School. Our school community is very concerned about the current initiative to expand Toland Road Landfill.

We are concerned about noise pollution. We are located directly next to highway 126. We are approximately 1.25 miles from Toland Road Landfill. We already have noise problems due to heavy traffic on highway 126, and any increase, especially an increase of a tenfold by your trucks, would significantly affect the learning environment at Santa Clara School. We also worry about air pollution. →

Submitted By: Mary Marsh
Name (please print)
5353 Loma Vista Rd.
Street Address
Ventura CA 93060
City State Zip

We worry about carbon monoxide emissions and particulates (PM10). The particulates (PM10) are known to the state of California to be cancer-causing agents. I am appalled at the county's lack of concern for our school. (No matter how small we are WE COUNT TOO!)

We also worry about water pollution. The Toland Road Landfill is located directly north of Santa Clara, and it is up on a hillside. When we have flooding (and in the past six years we've had two major floods) all of the surface run-off from the landfill flows directly through our school site down to the Santa Clara River. We always have a mess to clean up after flooding. I can only imagine the toxins and other harmful substances that will flow into our school yard if the Toland Road Landfill proposal goes through.

We also worry about ground water pollution. We already have enough problems with ground water contamination. The current proposal to put a fine-foot layer of clay is ridiculous. Downstream aquifers will be contaminated. I am also concerned about the existing dump not having a liner underneath.

We also worry about the potential increase in traffic accidents. It is already dangerous for our parents to have to enter and exit the school onto the highway. Now, if the Toland Road landfill is expanded, our parents would have to compete with your big trucks when using the middle lane.

Our school community is very troubled with the proposed to expand Toland Road landfill. It would directly affect our lives for the next thirty years. Some of our students live on Toland Road, as well as attend Santa Clara School. They will be most directly affected. You will turn our beautiful school environment into a living nightmare. Please reconsider.

Mary E. Marsh

**PUBLIC MEETING
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NOV 6 1995

District Managers

*VRSD
My name is Allison Sparbuhl and I am a very nice girl but could come where you wish. This letter is your gift from a landfill on Toland Road. I would like to see a better way because if they were any other way we have on Toland Road and then if we go up there we could get a big fence and it will make get away from us. We would have lots of people coming here for their lunch. There would also be a higher risk of accidents here by our school.*

Submitted By: Santa Clara School
Name (please print)
20030 E. Telegraph Rd.
Street Address
Santa Clara, CA 94060
City State Zip

PUBLIC MEETING
 WRITTEN COMMENTS
 DRAFT ENVIRONMENTAL IMPACT REPORT
 TOLAND ROAD LANDFILL EXPANSION AND
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NOV 5 1995

Submit to VRSD representative at the Public Meeting, or mail or hand deliver
 to: Ventura Regional Sanitation District, Attention: District Manager,
 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
 hand delivered comments must be received at the above address by 5:00 p.m.
 on Monday, November 6, 1995.

To Toland Landfill,
 We strongly oppose your proposed increase
 in the landfill use. If you increase the landfill
 more trucks will be using the highway in front
 of our school. These trucks will increase the
 noise and traffic. More litter is likely as well.
 Toland Road is our earthquake evacuation
 site and it will be unsafe (because of the
 PH 10 Particulates) for us to use. Please don't
 increase the Toland Landfill.
 Nicole Casey Olivia Sanchez Ali Gonzales
 Ed Wilaman Jeff Hopkins Ad Ana Espinoza
 Fernando Michael David Maldano Nick Lopez
 Ali Sav Hap Ki Amber Cooper
 Miss Rumpfelt

Submitted By: Santa Clara Elementary K-2
 Name (please print)
 20350 E. Telegraph Rd.
 Street Address
 Santa Paula, CA
 City State Zip

PUBLIC MEETING
 WRITTEN COMMENTS
 DRAFT ENVIRONMENTAL IMPACT REPORT
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 to: Ventura Regional Sanitation District, Attention: District Manager, S. D.,
 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
 hand delivered comments must be received at the above address by 5:00 p.m.
 on Monday, November 6, 1995.

Dear District Manager,
 If someone had a truck and it was to snow and
 you were taking tract I would tell them to
 Stop.

Submitted By: Michael Gonzalez
 Name (please print)
 20030 E. Telegraph Rd. Suite 150
 Street Address
 Santa Paula, CA 93060
 City State Zip

**PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND
CLOSURE/POSTCLOSURE RECEIVED**

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hand delivered comments must be received at the above address by 5:00 p.m.
on Monday, November 6, 1995.

Dear District Manager,
When the landfill is made bigger
that means that when it is windy
there will a lot of trash blowing
around! Also Toland Road is where we
will go if there is to be an
earthquake.

Submitted By: Lawrence J. Zeff
Name (please print)
70030 E. Telegraph Pa.
Street Address
Santa Barbara, CA 93060
City State Zip

**PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
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hand delivered comments must be received at the above address by 5:00 p.m.
on Monday, November 6, 1995.

Dear District Manager,
You should put the junk yard across the beach from it
flouds you see what happens, all your junk goes into our
school yard and gets it all junked, because your right school
is. So I think you should move the Toland Road Landfill.

Submitted By: Wyatt
Name (please print)
Santa Clara School
Street Address
Santa Clara, California 95060
City State Zip

**PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
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CLOSURE/POSTCLOSURE RECEIVED**

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1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
hand delivered comments must be received at the above address by 5:00 p.m.
on Monday, November 6, 1995.

Dear District Manager,
You should not be expanding
the Toland Road landfill because it can
cause a lot of problems like more air
pollution, ground water contamination,
more noise pollution, sea gulls coming and
stealing the trash and getting sick or even
die. And particulate (PM 10 particulate) known
to the state of California to be cancer-causing
agents will come to our school more
often. And there will be lots of litrings
These might even be in somebody's truck
that might hit the school. Toland Road
landfill is a evacuation site for a earth-
quake. And the question is why here? Why
next to a school? Especially a historical landmark?
Do people even care? No

Submitted By: Cristal Hopkins
Name (please print)
Street Address 20030 F. T. Leighton Rd.
City Santa Paula, CA State CA Zip 93060

**PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
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1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
hand delivered comments must be received at the above address by 5:00 p.m.
on Monday, November 6, 1995.

Dear District Manager,
K Carbon make hole is setting out school
* ground water contamination is effecting the city
* Noise pollution is effecting our school
* Sea gulls are getting brgt our school.
* Littering is a problem to us.
Because it is effecting our school.
It is effecting our city.
Because it is setting again school.
It is effecting our school.

Submitted By: Maesey
Name (please print)
Street Address 20075 S. Ortega St. at school
City Santa Paula, CA State CA Zip 93062

PUBLIC MEETING
 WRITTEN COMMENTS
 DRAFT ENVIRONMENTAL IMPACT REPORT
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NOV 5 1995

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~~Dear District Manager~~ Dear District Manager
~~When the trucks come and slam on their brakes pm particulates fall off and it will go in school grounds and it can hurt us and if more trucks come there will be more accidents we are aware of some to pick us up our traps vs off you can hurt vs bad when you go to the dump and you will air pollution and when kids have asthma it can make it worse and they will have to go to the doctor more.~~

Submitted By: Martin Leichtfuss
 Name (please print)
20030 E. Telegraph R.D.
 Street Address
Santa Paula, CA 93060
 City State Zip

PUBLIC MEETING
 WRITTEN COMMENTS
 DRAFT ENVIRONMENTAL IMPACT REPORT
 TOLAND ROAD LANDFILL EXPANSION AND
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Dear District Manager
When the trucks come and slam on their brakes pm particulates fall off and it will go in school grounds and it can hurt us and if more trucks come there will be more accidents we are aware of some to pick us up our traps vs off you can hurt vs bad when you go to the dump and you will air pollution and when kids have asthma it can make it worse and they will have to go to the doctor more.

Submitted By: Martin Leichtfuss
 Name (please print)
20030 E. Telegraph R.D.
 Street Address
Santa Paula, CA 93060
 City State Zip

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WRITTEN COMMENTS
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on Monday, November 6, 1995.

November 3, 1995

Dear District Manager,

I am a student at Santa Clara School. I am concerned about the expansion of the TOLAND ROAD LANDFILL. Our school is located directly below Island Road. Here is a list of concerns: Air pollution-carbon monoxide, water pollution, noise pollution, sea gulls, PM 10 particulates, littering, cummunity trucks, evacuation site for earthquake, higher risk of traffic accidents. These are some of the things we are concerned about.

Submitted By: Amanda Reed
Name (please print)
20030 E Telegraph Rd.
Street Address
Santa Paula CA 93060
City State Zip

**PUBLIC MEETING
WRITTEN COMMENTS
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on Monday, November 6, 1995.

V. R. S. D.

I hope you to get pollution tract
dear because the air take all the
trash and the doesn't look good.
Please.

Submitted By: Davidia Medina
Name (please print)
20030 E Telegraph Rd.
Street Address
Santa Paula CA 93060
City State Zip

PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
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1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
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on Monday, November 6, 1995.

Dear District Manager,
Please don't get rid of the landfill.
There is a trash load it takes this going
to now into the sand if an earth quake
happens we go up to land road and some of
the kids at preschool near est valley school
there would be a higher risk of accident
because there would be more rocks around the
area.

Submitted By: Paul Reed
Name (please print)
20070 E. Leeward Rd
Street Address
Santa Barbara State CA Zip 93060

PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
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1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
hand delivered comments must be received at the above address by 5:00 p.m.
on Monday, November 6, 1995.

Dear District Manager,
Please do not put the Toland Road
landfill in because of the reasons 1. There would
be a 3.0 carbon monoxide 2. Mil. pollution in
ground water containing n.p.a.s There
would be more NO's pollution. There would
be Seavulls that would rook near 5 PM 10 11. There
known in the west of California
agents. 6. Litter off the back of trucks.
7. Runaway trucks would crash right into our
school. 8. Toland road is our earthquake zone
9. There would be a higher risk of accidents.
10. Flood water - maintaining school grounds.
11. OUR SCHOOL IS A HISTORICAL
LANDMARK.

Submitted By: Daniel Post
Name (please print)
Santa Clara School 20030 E. Frymouth
Street Address
Santa Clara State CA Zip 95060

PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND
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NOV 5 1995

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1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
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on Monday, November 6, 1995.

Dear District Manager,
I am unsure that it might
hurt our school and here are
some consers. Air pollution,
water in area, road pollution,
particulates, littering, burning
truck, burning oil for
energy and a high risk
of accident. Please don't hurt
our school.
I would mostly it is a
historical landmark we want
our world to be a better place
with Dr.

Submitted By: Bronch Barrios
Name (please print)
2030 F. Toland Rd
Street Address
Ventura, CA 93003
City State Zip

PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND
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NOV 5 1995

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1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
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on Monday, November 6, 1995.

Name: District Manager,
As I speak for myself,
I hereby think that the Toland
Road landfill should be shut
down for reasons of the below. Air
pollution to us, water pollution when it
rains, noise pollution which distracts
us as it is, harming animals under ground
as well as in the air. Not too forget a major
PM10 particulate which is increasing our risk
of cancer. We speak litter is something
we are trying to solve that would
not help. So now that you read this I think
that you have decide to close the
Toland Road landfill for good.

Submitted By: Sara Cooper
Name (please print)
20030 East Kings Rd
Street Address
San Rafael, CA 94903
City State Zip

PUBLIC MEETING
 WRITTEN COMMENTS
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 TOLAND ROAD LANDFILL EXPANSION AND FIVE
 CLOSURE/POSTCLOSURE

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 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
 hand delivered comments must be received at the above address by 5:00 p.m.
 on Monday, November 6, 1995.

Dear District Manager,
 What I think about
 the Toland Road Landfill is that
 it should be shut down. Because
 it could affect many people below
 it like for example if we ever
 have a flood all the trash would
 just come right down to us and
 it would go and hurt animals that live
 in the Santa Clara River. And it could
 also cause air pollution or other
 kinds of pollution. So I think
 people would be safer if they shut
 down Toland Road Landfill for
 our sake.

Submitted By: Santa Clara
 Name (please print) Maria
10050 E. Telegraph Rd.
 Street Address
Santa Clara CA. 93065
 City State Zip

PUBLIC MEETING
 WRITTEN COMMENTS
 DRAFT ENVIRONMENTAL IMPACT REPORT
 TOLAND ROAD LANDFILL EXPANSION AND FIVE
 CLOSURE/POSTCLOSURE

NOV 5 1995

Submit to VRSD representative at the Public Meeting, or mail or hand deliver
 to: Ventura Regional Sanitation District, Attention: District Manager,
 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
 hand delivered comments must be received at the above address by 5:00 p.m.
 on Monday, November 6, 1995.

Dear District Manager,
 I think that you should not make
 the Toland Road Landfill. Because of all
 the noise pollution, if the truck would
 let us do our work. The one thing that
 concerned us all the truck accidents.
 Another thing that I don't like about the
 Toland Road Landfill is that when
 there is a storm all the trash will
 come down in school grounds. Also having
 the noise by our school will cause
 a lot of learning can be necessary and
 my car school yard. So please think
 more about the Toland Road Land-
 fill.

Submitted By: Jackie Gonzales
 Name (please print)
2003 E. Telegraph Rd
 Street Address
Santa Clara, California 93060
 City State Zip

PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND FIVE
CLOSURE/POSTCLOSURE

WV 5 1995

Submit to YRSD representative at the Public Meeting, or mail or hand deliver V, R, S, D,
to: Ventura Regional Sanitation District, Attention: District Manager,
1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
hand delivered comments must be received at the above address by 5:00 p.m.
on Monday, November 6, 1995.

I want you to stop
polluting California by making
the air and the water and
it is making it dangerous for
people here live close to you
because from the pollution it is
making it harder to work for
health. We need to be careful
of what we are doing and
the way we can have a
nice clean place to live. And
we need to be careful of
the water because if we keep
polluting the water we will have
no water so that we can drink.

Submitted By: Brian Ball
Name (please print)
20030 E. Toland
Street Address
City State Zip

PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND FIVE
CLOSURE/POSTCLOSURE

WV 5 1995

Submit to YRSD representative at the Public Meeting, or mail or hand deliver V, R, S, D,
to: Ventura Regional Sanitation District, Attention: District Manager,
1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
hand delivered comments must be received at the above address by 5:00 p.m.
on Monday, November 6, 1995.

Dear District Manager
I dont want todies really
just because your stupid
trash truck stop in front
of our schools
I bet
you
are
in a
in a
in a

Submitted By: Scott L
Name (please print)
20030
Street Address
Santa Barbara 93100
City State Zip

PUBLIC MEETING
 WRITTEN COMMENTS
 DRAFT ENVIRONMENTAL IMPACT REPORT
 TOLAND ROAD LANDFILL EXPANSION AND
 CLOSURE/POSTCLOSURE RECEIVED

NOV 5 1995

Submit to VRSD representative at the Public Meeting, or mail or hand deliver
 to: Ventura Regional Sanitation District, Attention: District Manager, R. S. D.,
 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
 hand delivered comments must be received at the above address by 5:00 p.m.
 on Monday, November 6, 1995.

Dear District Manager

Do not put a landfill on Toland Road
 because that is our sit for
 earthquakes plus when we get
 floods here all the oranges trash
 and other things come down and
 bury the play ground. The pollution
 it will cause. So I say do not put
 a land fill on Toland Road, Stephanie

Submitted By: Stephanie Nicole School
 Name (please print)
20030 E. Telegraph Rd.
 Street Address
Santa Paula, CA 93067
 City State Zip

95-105 (10/16/95/pm)

PUBLIC MEETING
 WRITTEN COMMENTS
 DRAFT ENVIRONMENTAL IMPACT REPORT
 TOLAND ROAD LANDFILL EXPANSION AND
 CLOSURE/POSTCLOSURE RECEIVED

NOV 5 1995

Submit to VRSD representative at the Public Meeting, or mail or hand deliver
 to: Ventura Regional Sanitation District, Attention: District Manager, R. S. D.,
 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
 hand delivered comments must be received at the above address by 5:00 p.m.
 on Monday, November 6, 1995.

Dear District Manager,
 Please do not have the Toland Road Landfill
 because my school I have to go to Toland
 Road when there is an earthquake.

Submitted By: Jessica
 Name (please print)
20030 E. Telegraph Rd.
 Street Address
Santa Paula, CA 93060
 City State Zip

95-105 (10/16/95/pm)

PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND FIVE
CLOSURE/POSTCLOSURE

Nov 5 1995

Submit to VRSD representative at the Public Meeting, or mail or hand deliver, R. S. D.,
to: Ventura Regional Sanitation District, Attention: District Manager,
1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
hand delivered comments must be received at the above address by 5:00 p.m.
on Monday, November 6, 1995.

Dear District Manager
If someone has seen it is
not good for this person.
If someone has a
if it is not good for
this person. I think they
can get even more of a
worse cold.

Submitted By: Ilana
Name (please print)
20030 Clara 20030
Street Address
Ventura, Ca. 93060
City State Zip

PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND FIVE
CLOSURE/POSTCLOSURE

Nov 5 1995

Submit to VRSD representative at the Public Meeting, or mail or hand deliver, R. S. D.,
to: Ventura Regional Sanitation District, Attention: District Manager,
1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or
hand delivered comments must be received at the above address by 5:00 p.m.
on Monday, November 6, 1995.

Dear District Manager,
I think that you should put the trash
on toln road because if there is a flood
the trash will come on our kids and
that is littering on our school when
you go to our school and put on
our braces. If you can come and pick up
our trash so we can breathe our clean air
now more. When you go on the ironing
lane or we try to get in to the
school you will blow it so we can
not get in to the school to learn
more things. If you make to make
nose we will not be able to be
our work like if we have a spelling
test we won't get to see that all.

Submitted By: Santa Clara School
Name (please print)
20030 E. Telegraph Ca
Street Address
Ventura, CA 93060
City State Zip

DOCUMENT 18
SANTA CLARA SCHOOL - MARY MARSH
RESPONSE TO COMMENTS

Response 18-1

1. Although the existing and future nonproject traffic-related cumulative noise conditions along Highway 126 in the project vicinity would constitute a significant impact, the project-related traffic volume would result in only an incremental increase to the noise level at the Santa Clara School (see Section 3.10 of the Draft EIR). The proposed project's contribution to the traffic-related cumulative noise impact would be a maximum increase of 0.6 dBA (approximately 71 dBA overall) under the "worse case" traffic scenario for 2015. As discussed in Section 3.10.3 of the Draft EIR, changes in noise levels less than 1 dBA may not be discernible.

Response 18-2

1. The proposed project would not result in new or additional air pollution-related health stress on sensitive individuals because the majority of the air emissions related to disposing of solid waste are not changing within the County when landfilling moves from Bailard to Toland. Section 3.12.3 of the Draft EIR provides the discussion of air emissions from the proposed project and the modeling of ambient air concentrations caused by these emissions. Table 3.12.10 of the Draft EIR shows that the peak concentration caused by the proposed project plus the background concentration would not exceed state or federal national ambient air quality standards. The ambient air quality standards have been established by the state and federal government at concentrations that protect human health from known effects, and include an adequate margin of safety.
2. Section 3.13 of the Draft EIR provides an additional discussion regarding the health risks of the proposed project's air emissions including criteria pollutants and toxic air contaminants. As can be seen in Table 3.13.2 of the Draft EIR, carcinogenic and noncarcinogenic (chronic and acute health hazards) health risks from the proposed project are orders of magnitude lower than significance thresholds. Thus, even the more susceptible individuals, including young children, would not be subjected to significant health effects from the proposed project.

Response 18-3

1. During a storm, surface water that is diverted around the landfill would follow the natural drainage, flowing from the site to O'Leary Creek. O'Leary Creek flows southeast, crossing under Highway 126 near Sycamore Road (approximately one-half mile from Toland Road), continuing into the Santa Clara River. The Santa Clara School lies southwest of the landfill and O'Leary Creek, and therefore would not receive stormwater that would originate from the area of the landfill.
2. Further, to control stormwater that could flow from the proposed project site in the event of a 100-year, 24-hour storm, a detention basin would be constructed. The basin would be approximately 250 feet by 150 feet and 10 feet deep. The maximum water release rate from the detention basin would be equal to the current stormwater discharge rate from the site for the 100-year, 24-hour storm event. Based on the preliminary hydrology calculations in Appendix C of the Draft EIR, the current stormwater discharge rate from the site is estimated to be 337 cubic feet per second (cfs). The detained stormwater would be released from the basin via a pipe sized to limit the outflow to a maximum of 337 cfs. This would reduce the impacts from potential storm events to less than significant.

Response 18-4

1. For the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot thick low permeability intermediate soil barrier would be installed, as discussed in Section 2.5.1 of the Draft EIR. Incorporated with the intermediate soil barrier is a landfill gas collection system, and leachate collection and removal system. The design of the intermediate soil barrier system shall take into account the overburden weight of the new waste and shall account for any settlement that may occur.
2. The intermediate soil barrier to isolate the existing waste from the new waste is not required by state or federal landfill regulations for vertical expansions; however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.
3. In addition, as discussed in Section 3.3 of the Draft EIR, based on the geologic and hydrogeologic conditions at Toland, and the landfill regulatory requirements included in

CCR Titles 14 and 23, and Subtitle D (e.g., composite liner system, landfill gas collection system, leachate collection and removal system, etc.), the proposed project would not impact ground water quality.

Response 18-5

1. The traffic study prepared for the proposed project employed the methodologies recommended by Caltrans for intersection capacity analysis, signal warrants, and highway design. These methodologies have been developed to optimize traffic flow and assure traffic safety. Neither Caltrans nor the County Transportation Department have identified hazardous conditions at the Toland Road/Highway 126 intersection. In addition, these agencies have concurred with the traffic study's conclusion that signal warrants at this intersection would not be met by the proposed project (see Comment Letters 02 and 13). Moreover, as discussed in Section 3.11.3.1.3 of the Draft EIR, the accident rate along Highway 126 in the vicinity of Toland Road is substantially lower than the statewide average. The flashing beacon and warning signs, as recommended by Caltrans and included in the EIR as mitigation measures, would mitigate potential traffic-related safety issues at the intersection.
2. As discussed in Section 3.11.3.1.2 of the Draft EIR, excessive vehicle stacking for the eastbound left turn lane movement from Highway 126 to Toland Road is not anticipated and would not interfere with parents dropping off or picking up students. The length of the left turn pocket at the Toland Road/Highway 126 intersection is approximately 120 feet, which exceeds the minimum length required pursuant to the Caltrans Highway Design Manual (Caltrans, 1995) and provides waste trucks and other vehicles adequate distance to safely approach the intersection.

RESPONSE TO STUDENTS

In addition to the above comments from Mary Marsh, students at the Santa Clara School submitted comments on the proposed project. The comments were categorized under the headings listed in Table 2.3 (see the end of the responses to Document 18). Table 2.3 also identifies the individual concerns of students. In responding to the students, an attempt was made to clearly explain the issues and potential impacts in a way the students would understand. More detailed and technical information regarding the concerns raised by the students is included in various other response letters in this Final EIR and in Chapter 3.0 of the Draft EIR.

Air Pollution

1. The potential for air pollution from the proposed project was a concern for many of the students. Specifically mentioned was the potential increase and subsequent impacts of "particulates" (i.e., PM₁₀).
2. PM₁₀ or particulates are microscopic particles of material, such as dust. Particulates can be caused by cars, tractors, or even wind that picks up dust from the ground surface. If there are too many particulates in the air, it could cause health problems. Although expanded landfill activities and traffic would generate more dust, PM₁₀ emissions are expected to be reduced, because some of the dirt roads in the area will be paved. Paving the dirt roads will reduce the amount of dust on the roads, therefore reducing the amount of dust kicked up by trucks driving on the roads. Since more dust is kicked up when roads are dry, roads on the landfill will also be watered. These activities will help reduce the potential for air pollution near Santa Clara School.

Evacuation Safety Zone

1. Some students were concerned that with approval of the proposed project, the area to be used as the evacuation site for the school in the event of an emergency would be unsafe.
2. If there is an emergency situation, such as a flood or earthquake, students and teachers at the Santa Clara School would leave the school together and go up Toland Road to an area near Toland County Park. Toland Road Landfill is located approximately one mile from Toland County Park and the expansion would not affect this "safe zone."

Health Concerns

1. Many students expressed concerns regarding the potential of contracting Valley Fever and/or cancer from the proposed project.
2. Valley Fever is caused by spores in the soil. When soil is moved or disturbed (such as in farming, construction or landfill activities), the spores are released and could be inhaled by people close to the activities. Because of the earth moving operations in the area, most people who live in the southern California, including Ventura County and the Santa Clara Valley have been exposed at some time to the spores that could cause Valley Fever. Exposure to the spores decreases the chances of catching the disease. Therefore, it is unlikely that the activities from the proposed project would increase the potential of contracting Valley Fever.
3. In addition to studying the impacts of Valley Fever, analysis was conducted for the Draft EIR regarding the potential cancer risk from the proposed project. This analysis included assessing the potential impacts of toxic constituents from diesel vehicle exhaust from waste hauling trucks. It was determined that even if a person was exposed to diesel exhaust 24 hours per day, 365 days per year for 70 years, it would be unlikely that they would contract cancer.

Historical Landmark

1. Some students stated concerns that the proposed project would impact the Santa Clara School's significance as a historic landmark.
2. Historic landmarks are recognized due to their special place in the history of a community, a region, or even the nation. Historic landmarks, like the Santa Clara School, are valued because they are a physical piece of our history. Better than books, landmarks give people the opportunity to see and experience how things were done long before they were born.
3. The tie between the present and the past that the Santa Clara School provides would not change due to the expansion of Toland Landfill. The schoolhouse will remain as it is today, and people will continue to be able to visit and use it as they do now. The landfill is located more than two miles away from Santa Clara School and its expansion will not harm or change the value of the school as a historic landmark.

Litter

1. Many students commented on the potential increase of litter on the school grounds because of the proposed project.
2. There are many things that are done at a landfill to help control litter. Some are done everyday or many times during the day. To control litter at Toland the following things would be done:
 - The waste would be compacted or compressed to make it smaller.
 - After the waste is placed in the landfill it would be covered with soil. This would happen at least once a day, or more often if necessary. By covering the waste with soil, paper and other trash would not be able to blow off the landfill.
 - The area where trash is placed (called the working face) is kept small so the trash cannot blow away and become litter.
 - Portable fences are installed by the working face to stop litter from blowing off the site.
 - If litter is found, landfill workers are sent out to clean it up. The landfill workers also check fences around the landfill and the roads leading to the landfill, and remove litter, as necessary.

Some of the activities that would be done to control litter are required by law. These things would help keep litter away from areas around the landfill, such as Santa Clara School.

Noise

1. Students expressed concern over the amount of noise from trucks traveling on Highway 126 interfering with schoolwork.
2. Noise levels were measured, using special equipment, to determine the current level of noise near Santa Clara School. Noise is measured in terms of the "A-weighted decibel" or dBA. For example, a lawn mower would have a sound level of approximately 90 dBA, compared to a bird call which has a sound level of 40 dBA (see Table 3.10.1 of the Draft EIR for other examples of noise levels).
3. The highest noise level measured at Santa Clara School was approximately 70 dBA and is caused by traffic on Highway 126. If Toland Road Landfill is expanded and more trucks come to the landfill, noise from traffic traveling on Highway 126 would be expected to increase by less than 1 dBA at Santa Clara School (for a total of approximately 71 dBA).

Changes in noise levels less than 1 dBA may not be able to be heard. Therefore, noise associated with project traffic at Santa Clara School may not be noticeable to students and should not interfere with schoolwork.

Seagulls

1. Concerns were expressed by students regarding seagulls coming on the school grounds.
2. Seagulls sometimes go to landfills to find food. Seagulls may dig through trash that is left uncovered to find food that was thrown away by people. Seagulls do not use the Toland Road Landfill to find food at this time. Therefore, seagulls are not expected to use the site when the landfill is expanded. The same measures for controlling litter also help to discourage seagulls from coming to the site. If the trash is covered, the seagulls would not have any reason to go to the Toland Road Landfill. If the seagulls do become a problem at the landfill or surrounding areas, such as Santa Clara School, additional things will be done to discourage the birds from coming to the site.

Traffic Safety

1. Concerns from students regarding traffic safety included the potential safety hazards when parents drop off or pick up students at Santa Clara School.
2. When trash trucks make a turn left to go up Toland Road, they must use the special left turn lane. The left turn lane is long enough for at least two large trash trucks without causing problems for cars turning into the school. There should not be any more than two trucks at a time waiting to make the left turn to go up Toland Road. Therefore, trash trucks turning from Highway 126 onto Toland Road would not cause safety problems for parents dropping off or picking up students at the Santa Clara School.

Water Pollution

1. Concerns about water pollution included the potential contamination of ground water and surface water in the area of the Toland Road Landfill. Of special concern was the Santa Clara River.

2. Water pollution could occur if rain that fell on the landfill, seeped through the trash and went into the water below the ground. To protect the water below the ground, a liner is placed on the ground surface before trash is put into the landfill. The liner includes a thick plastic sheet that water cannot penetrate. In addition, pipes are placed throughout the landfill to collect any water that may get into the landfill. When the landfill is full, a cover will be placed over it to keep rain water from seeping down through the trash. These activities would protect the ground water from being polluted.
3. Special precautions are also taken to protect surface water (like O'Leary Creek and the Santa Clara River). To make sure that Toland Road Landfill would not cause flooding during a storm, the landfill would have a basin (which is like a large pond) to collect the water as it flows around the landfill. This water would not touch the trash, because the trash would be covered every day. This would allow the water to be controlled, and keep trash from flowing off the landfill. Water collected in the basin would be released slowly, so that O'Leary Creek would not overflow and water would not run down Toland Road into the Santa Clara River.

Wildlife

1. Students were concerned that the proposed expansion would harm wildlife in the areas surrounding the landfill.
2. The first step in protecting wildlife is finding out the types of animals that may live on or near the landfill. So, a biologist was sent to survey the animals at the landfill. During a wildlife survey, the biologist walks around the landfill, noting the kinds of animals that inhabit the site. In addition, information is gathered regarding the potential for certain animals to live on the site. This information is compiled in a report, which is used in the EIR. According to the wildlife survey and information search, Toland Road Landfill would not harm animals. This is based on the small number of acres that would be disturbed (less than 3 acres), and that after the landfill is complete, the site could again be used by wildlife in the area.

TABLE 2.3

SUMMARY OF ISSUES FROM STUDENTS AT SANTA CLARA SCHOOL

STUDENT COMMENTERS	AREAS OF CONCERN										
	Air Pollution	Evacuation Safety Zone	Health Concerns	Historical Landmark	Litter	Noise	Seagulls	Traffic Safety	Water Pollution	Wildlife	
Miss Rumfeit's K-2 Class	X	X			X	X		X			
Allison Sparkukl		X	X				X				
Michael Gonzales								X			
Lauren Zepf		X			X						
Wyatt					X						
Crystal Hopkins	X	X	X	X	X	X	X	X	X		
Kassy	X				X	X	X	X	X		
Lulum Leichtfuss	X		X								
Matnu Leichtfuss	X				X	X			X		
Amanda Reed	X	X	X		X	X	X	X	X		
Claudia Medrano	X										
Paul Reed		X	X					X			
Daniel Post	X	X	X	X	X	X	X	X	X		
Brenda Banaelas	X	X	X	X	X	X		X	X		
Sara Cooper	X		X		X	X			X	X	
Marcela Avila	X								X	X	
Jackie Gonzales					X	X		X	X		
Scott LL								X			
Brian Ball	X		X						X		
Stephanie	X	X			X				X		
Jessica		X									
Ilana			X								
No Name	X				X	X		X			

95-105 Final EIR (1/5/96/rmm)

Board of Directors
Don Peterson, President
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Z. Robert Peck
General Manager
Frederick J. Gierke



UNITED WATER CONSERVATION DISTRICT

"Conserving Water Since 1927"

November 3, 1995

Mr. Clint Whitney, General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Ste 150
Ventura, CA 93003-5562

Subject: Draft Environmental Impact Report, Toland Road Landfill

Dear Mr. Whitney:

Thank you for the opportunity to respond to this draft EIR and for the cooperation that your staff has shown to United Water Conservation District over the past several months as United has evaluated the groundwater conditions in the vicinity of the Toland Road landfill. As you know, United Water has the responsibility of overseeing the health of the aquifers within its boundaries. Toland Road landfill overlies the edge of the Fillmore groundwater basin, which lies entirely within United's boundaries. In evaluating the groundwater conditions in the area of the landfill, our primary concerns have been with ensuring that leachate does not reach the aquifer through leakage from the landfill.

The present and proposed landfills pose two somewhat different situations, with the present landfill being unlined and the proposed landfill being lined. Our concerns are based on the observations that, despite the best engineering efforts, many landfills across the U.S. do leak. Therefore, our assumption is that any landfill has the possibility of leaking, and prudent management requires that monitoring be established that detects any such leakage so that remedial action can be taken.

We have included for your information a review of the groundwater aspects of the DEIR conducted by Dr. Norm Brown. Of particular concern for United is the possibility that a leachate leak could enter the groundwater undetected. The DEIR makes reference to an expanded groundwater monitoring system at the site, but does not propose a specific plan for this expansion.

United Water strongly supports the installation of an expanded groundwater monitoring system. The expanded monitoring system is recommended whether or not Toland Road

19



UNITED WATER CONSERVATION DISTRICT

Mr. Clint Whitney
November 6, 1995
Page 2

landfill is expanded, to monitor for possible existing contamination of groundwater from waste in the present, unlined landfill. Only through an expanded monitoring system can Ventura Regional Sanitation District and United Water Conservation District fully evaluate the risk of groundwater contamination to the San Pedro Formation -- the main regional aquifer adjacent to the landfill and extending beneath the Santa Clara River Valley -- from the present landfill as well as its proposed expansion.

United would be very willing to work with your staff on the siting of monitoring points, so that potential concerns on groundwater contamination can be allayed. We look forward to working with you on this endeavor.

Very truly yours,


Frederick J. Gierke
General Manager

(Enclosure)
FJG:SBB

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File: Ventura Regional Sanitation District



INTEGRATED WATER TECHNOLOGIES, INC.

October 11, 1995

Mr. Fred Gienke, General Manager
United Water Conservation District
725 East Main Street, Suite 301
Santa Paula, California 93061

Dear Mr. Gienke:

This letter report summarizes Integrated Water Technologies' ("IWT") review of the September 1995 Draft Environmental Impact Report ("DEIR") on the Toland Road Landfill Expansion and Landfill Closure/Postclosure, prepared by Environmental Solutions, Inc. for the Ventura Regional Sanitation District. The proposal for landfill expansion includes several important measures designed to protect groundwater resources from contamination by leachate from waste added to the expanded landfill. These measures include the placement of a liner and leachate collection system beneath the expansion waste fill, construction of a new surface water runoff and collection system, and emplacement of a gas collection system in the existing, unlined waste pile (this existing waste pile would be overlain by the liner and waste of the expanded facility).

In addition, the DEIR makes reference to an expanded groundwater monitoring system at the site, but does not propose a specific plan for this expansion. IWT strongly supports the installation of an expanded groundwater monitoring system, and also recommends that there be expanded monitoring for possible existing contamination of groundwater from waste in the present, unlined landfill. Only through monitoring of the present landfill can United Water Conservation District fully evaluate the risk of groundwater contamination to the San Pedro Formation -- the main regional aquifer adjacent to the landfill and extending beneath the Santa Clara River Valley -- from the present landfill as well as from the proposed expansion.

POTENTIAL IMPACT OF THE TOLAND ROAD LANDFILL ON GROUNDWATER RESOURCES

The DEIR suggests that potential contamination of groundwater from the landfill is not a significant possible impact of the proposed, expanded facility. In the

1

Summary of Impact and Mitigation Measures (DEIR §1.3.2(2), Table 1.1, p. 1-12), the "Water Resources" subsection of "Potential Impacts" does not even mention possible contamination to the local or regional aquifers. Accordingly, the corresponding section of "Mitigation Measures" states: "The proposed project would not result in significant impacts to surface water or ground water quality." No mitigation of possible groundwater contamination is discussed. IWT believes that presently available information regarding possible groundwater contamination suggests that groundwater contamination is a possible present concern, and accordingly, could be a possible future concern.

1
CONT.

As discussed in IWT's letter to you dated June 2, 1995 (Attachment A), the existing monitoring network at the Toland Road Landfill site is inadequate for detection of potential contamination to groundwater in the vicinity of the landfill (refer to the section "Present Groundwater Monitoring" in Attachment A). Only one monitoring well (well "T-1") is completed in the saturated portion of the Pico Formation, which lies beneath the unlined portion of the landfill. Moreover, this well has not been regularly monitored as part of the quarterly or annual well sampling program. The volatile organic compounds ("VOC's") PCE and TCE were detected in Pico Formation groundwater sampled in April 1992 from the on-site "Replacement" well, raising suspicion that leachate from the existing landfill has already contaminated the local groundwater.

2

In this context, the DEIR makes several statements about the hydrogeology of the Pico Formation which indicate inadequate analysis of potential contamination of local and regional groundwater supply from infiltration of leachate at the landfill site:

- 1) The DEIR states: "Two onsite ground water monitoring wells have been installed at Toland ... in the Pico Formation bedrock [well "T-1" and the "Replacement" well] and confirm that this geologic unit, while saturated at depth, is a nonwater bearing unit. ... Organic analyses indicates [sic] that the ground water in the Pico Formation under the site has not been affected by the landfill" (DEIR §3.2.2.1(2), p. 3.3-9).

3

These two wells, which are 75' apart and are the only two wells completed in the Pico Formation, are insufficient for meaningful determination of possible contamination from the landfill across the geologic and/or structural contacts between the Pico Formation and the adjacent San Pedro Formation aquifer. The aforementioned detection of PCE and TCE in the Replacement well is inconsistent

with the DEIR assertion that groundwater quality in the Pico Formation is not affected by the landfill.

2) The DEIR states: "Regional ground water potentiometric surfaces indicate that ground water flow at depth beneath the site is generally from north to south with a minor westerly trend" (DEIR §3.3.2.1(3), p. 3.3-9). In support, the DEIR provides a regional potentiometric surface map for 1984 (the basemap source cited is Mann, 1959). Although the postulated gradient is plausible, neither data from the map provided nor from known wells in the vicinity of the landfill supply information about groundwater gradients in the Pico Formation. More importantly, local flow of groundwater and/or contaminants in the landfill area bedrock units -- along faults, fractures or geologic contacts -- may occur in directions significantly different from the regional gradient. Flow in such directions cannot be monitored by the existing well network.

3) The DEIR states: "... ground water elevations indicate that the saturated zone of the Pico Formation is approximately 85 feet beneath the ground surface (bgs). Pump testing conducted on ground water in the Pico Formation shows the formation to yield approximately 0.07 gallons per minute indicating that ground water is virtually nonexistent (SGD, 1988)" (DEIR §3.3.3.1.1(6), p. 3.3-15).

During drilling of well T-1, groundwater was encountered at 85' depth, but static water level in the borehole measured 12' after well development. Production during development of this well was <0.1 gpm, but IWT is unaware of any pump testing on this well or on the Replacement well. From these findings alone, IWT cannot support the statement that groundwater is "virtually nonexistent" in the Pico Formation.

Part of the closure/postclosure plans discussed in the DEIR includes the statement: "... a ground water monitoring system would provide early detection of potential sources of groundwater degradation from the landfill" (DEIR §3.3.3.2.1(1), p. 3.3-19). In section 1.3.1 (p. 1-9) of the DEIR, it is explained that the proposed project will include an expanded groundwater and landfill gas monitoring system, but the details of this expansion are not provided. IWT strongly endorses increased groundwater monitoring at the Toland Road Landfill area, not only for any proposed expansion and closure/postclosure activity, but also for the currently operating landfill.

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SPECIAL CONSIDERATIONS REGARDING THE GEOLOGY OF THE TOLAND ROAD LANDFILL SITE

One way that leachate from the unlined Toland Road Landfill can migrate through the underlying Pico Formation is along some faults, fractures, bedding planes and geologic contacts. Such features can produce local flow directions which are very different from the regional groundwater gradient, particularly in areas such as Toland where the geologic units are steeply dipping. In IWT's letter of June 2, 1995, the Culbertson Fault, which has been mapped at the south margin of the Pico Formation in the area of the landfill, is noted as a possible conduit for this type of groundwater flow. In this way, groundwater could flow east or west along the fault, either because of the structural geology of the fault zone itself, or because of the juxtaposition of different bedrock types which exist to either side of it.

The DEIR provides an interpretation of the site geology in which the Culbertson Fault is absent at the landfill. The Culbertson Fault has been previously mapped by Dibblee (1990) and Rockwell (1982) immediately adjacent to the existing landfill. A 1992 study by Fugro, cited in the DEIR, unsuccessfully attempted to locate the near-surface trace of the fault in a series of trenches -- a finding which was apparently supported by Dr. Rockwell. However, the location of the Culbertson Fault, if present at the landfill, coincides with the contact between the Pico Formation and the transitional Las Posas Sand, which is attributed by other workers to either the upper Pico Formation or the lower San Pedro Formation. This contact, whether it is formed by the fault or is an unfaulted geologic contact, may act as a conduit for groundwater flow. The presence of any contaminated groundwater migrating along this contact would not be detected by the existing groundwater monitoring system.

In addition, the proposed landfill expansion would overlie the transitional Las Posas Sand, which consists of materials more permeable than the Pico Formation, including lenses of pebble-conglomerates. In areas where the expansion waste would directly overlie the Las Posas Sand, permeable geologic units in hydraulic connection with the main regional aquifer (the San Pedro Formation) would be protected from leachate contamination only by the soil and composite liner underlying the expansion (see cross-section A-A', Figure 3.2.8, p. 3.2-21 of DEIR; to avoid confusion, please note that the intersection of A-A' and B-B' are mislocated in both cross sections).

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flowpaths which are directed to the seep and flowpaths in hydraulic connection with the groundwater table.

SEEPS

Several investigations of water seeps in the area of Toland Road landfill have occurred during 1995, including the study conducted by United Water Conservation District staff. These seeps are problematic because they present a potential source of water in the sidewalls of the landfill, because they indicate possible groundwater flow in directions which cannot be monitored by the existing wells, and because water sampled by United from the seep had relatively high concentrations of certain metals.

In the proposed landfill expansion, seeps in the landfill sidewalls will be accommodated by the emplacement of drainage materials between the formation wall and the sidewall liner. Together with the presence of the sidewall liner material, this arrangement would help to prevent water from the seeps from infiltrating the waste pile.

The issue of whether or not water quality measured from the seeps represents possible existing contamination of groundwater by leachate is more problematic. In response to United's study, the company which prepared the DEIR (Environmental Solutions, Inc.) investigated the same seep, and concluded that the chemical constituents carried in solution were naturally occurring. The presence of metals in the water samples was attributed to the concentration of constituents leached from soil, bedrock and Quaternary terrace deposits. The terrace deposits were also believed to be the origin of the white sulfate precipitate at the seep. However, some of the supporting evidence for this conclusion is debatable (DEIR, §3.3.2.2(4 to 8), p. 3.3-11 to 3.3-13):

- 1) The DEIR suggests that the seeps "... represent perched surface [sic] water within the Quaternary terrace deposits that overlie the Pico Formation", and "A perched water flow path from Toland to the canyon [at the "United seep"] does not exist. Stratigraphic bedding within the Pico Formation does not dip toward the canyon."
- This is an insufficient explanation for the source of the United seep, which exists within an outcropping of the Pico Formation in the canyon. Water sampled at the seep must have traveled at least in part through rocks of the Pico Formation. At some point during the migration of this groundwater it may have even been divided between

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cont.

- 2) The DEIR states: "Toland has not accepted significant quantities of liquids and could not generate significant quantities of leachate (SGD, 1988)."

The presence of PCE and TCE in groundwater samples from the Pico Formation is sufficient evidence to raise suspicion that leachate has reached saturated portions of the bedrock beneath the landfill site.

- 3) The DEIR states: "Toland is situated in the Pico Formation, which is considered a nonwater-bearing formation in the area (Mann, 1959) due to its low permeability, and would be unlikely to act as a flow path from Toland. Based on a conservative ground water velocity through the Pico Formation, for the 1,000-foot distance from Toland to the seeps, a minimum travel time of 50 years would be required. Toland has been receiving waste since 1970, a period of 25 years, which represents half of the conservatively calculated time that it would take ground water to flow from the area of the landfill to the seeps in the drainage canyon located northeast of the landfill."

In the Pico Formation, groundwater movement along groups of fracture, faults, bedding planes, and geologic contacts is likely very much faster than the flow rate which would be calculated for the relatively impermeable material in between these features.


Groundwater could easily migrate along a structural conduit from the landfill to the seep in a short period of time (much less than 25 years). It is for this same geological reason that the existing groundwater monitoring program is insufficient to detect possible contamination of groundwater from the landfill.

RECOMMENDATIONS

The general proposal to expand the groundwater monitoring network in the vicinity of the Toland Road Landfill is strongly endorsed by IWT. However, the specifics of such an expanded program are not provided in the DEIR, and the present monitoring network cannot accurately test for possible existing groundwater contamination. The detection of VOC's in rising groundwater, the uncertain nature of groundwater flow to the United seep, and the paucity of existing groundwater monitoring wells strongly indicate the need for more

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thorough evaluation of potential impacts to groundwater from the landfill, regardless of any expansion activity. Recommendations for immediate action were outlined in the IWT letter of June 2, 1995, and it is suggested that such actions be undertaken prior to landfill expansion, so that the results of a more robust groundwater monitoring program may be applied to the evaluation of the proposed expansion.

Sincerely,

Norman N. Brown, Ph.D.
Vice President

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INTEGRATED WATER TECHNOLOGIES, INC.

ATTACHMENT A -- COPY OF IWT LETTER REPORT TO UNITED WATER CONSERVATION DISTRICT, DATED JUNE 2, 1995

June 2, 1995

Mr. Fred Gientke, General Manger
United Water Conservation District
725 East Main Street, Suite 301
Santa Paula, California 93061

Dear Mr. Gientke:

This letter report summarizes Integrated Water Technologies' ("IWT") conclusions about its recent investigations into the Toland Road Landfill, regarding the landfill's potential impacts on the groundwater supply your District manages. Although small, the landfill is nonetheless of concern to the District for four major reasons:

- 1) The landfill is unlined, and therefore relies on the relatively impermeable underlying strata (the Pico Formation) to control leachate from migrating into the groundwater system. Even though this geologic unit is composed mostly of clay and is relatively non-permeable, it cannot be considered hydraulically equivalent to a properly constructed landfill liner, and there exists a long-term threat of contamination through infiltration of leachate into the main aquifer adjacent to the landfill (the main aquifer is the San Pedro Formation, which extends under the Santa Clara River Valley). In addition, geologic contacts between strata, and the presence of a fault (the Culbertson Fault) on the south side of the landfill may provide conduits for the migration of leachate away from the landfill, and potentially into the regional groundwater regime.
- 2) The Ventura Regional Sanitary District proposes to increase the amount of refuse it deposits in the landfill. With respect to the groundwater resource, this is problematic primarily from the perspective of increasing the volume of potential contaminant source material.
- 3) There exists inadequate monitoring of groundwater conditions in the immediate vicinity of the landfill. Only one monitoring well is completed in the saturated portion of the Pico Formation underlying the

Letter Report for Mr. Fred Gientke, General Manager
Toland Road Landfill - Review of Draft EIR ATTACHMENT A
Integrated Water Technologies, Inc.
October 11, 1995

landfill. This well has not been regularly monitored as part of the quarterly or annual well sampling program. Existing monitoring wells cannot test how the Culbertson Fault may affect groundwater migration in the vicinity of the landfill.

- 4) Sampling of water seeps by United Water Conservation District ("UWCD") staff in the canyon east of the landfill, and detection of PCE and TCE in Pico Formation groundwater samples raise suspicion that leachate from the landfill may have already contaminated the local groundwater. Both TCE and PCE are more dense than water, and will tend to migrate downward through the aquifer.

In consideration of these findings, IWT believes that future use and/or expansion of the Toland Road Landfill should be predicated on the development of a more robust monitoring program, primarily through the installation of additional monitoring wells. In addition, IWT believes that the detection of PCE and TCE in the shallow on-site well ("Replacement Well"), together with the metals sampled in the groundwater seep, raise special concerns about possible groundwater contamination. The circumstances and water constituents of these two possible contamination occurrences should be addressed by:

- Determination of contaminant source -- for both organic and inorganic constituents detected;
- Identification of the regional extent of any groundwater contamination by leachate; and
- If contamination is derived from the leachate, development of an action plan to remediate contaminated groundwater and to prevent future contamination.

INFORMATION SOURCES

Results presented herein are based on information made available from the Ventura Regional Sanitation District ("VRSD"), the California Regional Water Quality Control Board ("RWQCB"), the County of Ventura Department of Environmental Health ("Ventura Environmental Health"), and UWCD. Data reported and cited include reports by UWCD; Stall, Gardner and Dunne ("SGD");

Fugro McClelland/Fugro West ("Fugro"); VRSD; the U.S. Geological Survey ("USGS"); and correspondence files from the RWQCB.

PERMITTING HISTORY AND USE OF THE TOLAND ROAD LANDFILL

Toland Road Landfill was opened in July 1970, under permit from Ventura County (Conditional Use Permit #3141). Waste discharge requirements were issued by the RWQCB under Resolution #70-22, and Ventura Environmental Health is designated as the local enforcement agency by a California Waste Management Board Waste Facility Permit. In 1972, VRSD assumed operations and in 1986 purchased the site; VRSD is the present owner and operator of the landfill. The landfill accepts approximately 610 tons of refuse per week, and had an average refuse depth of 50' in 1988, at the time of the Landfill's only Solid Waste Assessment Test ("SWAT").

VRSD has applied for an expansion of the Toland Road Landfill, to allow greater weekly volumes of refuse disposal. The expansion would result primarily in deepening the refuse pile, with some lateral expansion up the canyon sides. The California RWQCB requires that any expansion be preceded by an environmental impact report ("EIR"), and a Report of Waste Discharge ("RWD"), in which geological and hydrogeological studies are presented together with a revised monitoring plan. Results of fault studies, such as trenching analysis along the Culbertson Fault, would likely be included in the RWD. VRSD estimates that a draft of the EIR will be available for review in September 1995, and the final drafts of the EIR and the RWD will be completed early in 1996.

HYDROGEOLOGIC SETTING OF THE LANDFILL

The Toland Road Landfill is unlined, and has no leachate collection system. Normal operations provide only for daily and interim cover material spread over the refuse. The landfill site is on the northern margin of the Fillmore Basin, and overlies the Pico Formation, which exists at or near surface in the vicinity of the landfill (Plates I and II). The Pico Formation is a poorly consolidated claystone containing sandy lenses, and is Pliocene age. At the Toland Road Landfill, it is overturned and north-dipping.

The south margin of the landfill is bounded by the Culbertson Fault, which separates the Pico Formation from the Las Posas Sand of Dibblee (which may be

the basal San Pedro Fm., or the upper Pico Fm. of other workers' terminology), a younger geologic formation which lies here underneath the Pico. Note that at the detailed scale of Plate II, which uses the USGS GIS coverages, the geologic contact between the Pico Formation and the San Pedro Formation does not align precisely along the Culbertson Fault. South of the Las Posas Sand are the main outcrops of the San Pedro Formation (Saugus Formation of Dibblee), which is a groundwater aquifer supplying a number of wells in the region. The San Pedro Formation, a poorly consolidated conglomerate containing some sandstone units, is the youngest of all three geologic formations in the landfill area, and the most productive aquifer of all three formations.

Southwest of the landfill, the San Pedro Formation dips south, and the primary concern is that leachate from the landfill could enter the San Pedro aquifer across the stratigraphic and fault contacts between the San Pedro and the Pico Formations.

PRESENT GROUNDWATER MONITORING

Monitoring of groundwater quality, done by quarterly and annual reporting of groundwater quality from several wells in the general vicinity of the Toland Road Landfill, is provided in reports prepared by VRSD. However, placement, density and construction of the monitoring wells are insufficient for meaningful determination of possible contamination from the landfill across the geologic contacts between the Pico and the San Pedro formations. Groundwater level measurements are also taken by VRSD and made available in monthly reports.

Shown in blue on Plates I and II are wells from which water quality samples have been analyzed in the context of Toland Road Landfill monitoring. Included are several wells which were sampled before construction of the landfill, and provide historical water quality data. Only 4 of the wells shown in blue are regularly monitored for water quality (the Lang, Temple, Culbertson, and Replacement wells labeled on Plate II). Wells in red are other wells identified in the USGS RASA (Regional Aquifer System Analysis) study.

Pico Formation

Two monitoring wells on the landfill site - at the bottom end of the containment area - are completed in the Pico Formation. One is a shallow well (40' depth), which has been dry since 1986 except for one quarterly measurement in April

1992 (4N/20W-29G1; "Replacement Well"). In 1988, another monitoring well was installed approximately 75' away (well "T-1"). The Pico Formation lies 6' below surface in this borehole, which is screened at an interval 205-240'. During drilling, groundwater was reported to be encountered at 85' depth, with static water levels in the borehole measured at 12' after well development (production during development was -0.1 gpm).

Because of the steep dips of the Pico Formation in the landfill area, it is uncertain both what the groundwater flow directions are within this formation, and what connections exist between the surface and the saturated portion of the Pico Formation. The existing monitoring wells may not provide groundwater sampling representative of the numerous possible flow directions within the Pico Formation, along formation contacts, or along the Culbertson Fault.

Surprisingly, the T-1 well, which is the only well completed in the saturated portion of the Pico Formation, has not been sampled as part of the regular quarterly and annual monitoring program.

When groundwater rose in response to a wet period and was detected in the Replacement well during April 1992, the volatile organic compounds ("VOC's") PCE and TCE were detected, at concentrations of 4.5 µg/l and 1.8 µg/l, respectively.

TDS concentrations in the Replacement well during 1986 sampling were approximately 3,800 mg/l. Brackish groundwater of even higher TDS is known to occur elsewhere in the Pico Formation, but no data exist to determine the general nature of inorganic groundwater chemistry from the Pico Formation in the vicinity of the landfill.

San Pedro Formation

Regional groundwater monitoring is done by sampling from several agricultural wells completed in the San Pedro Formation; all these wells are south of the landfill disposal area (Plate II). Water quality sampling is reported from 12 wells in the San Pedro Formation in various reports obtained for this study, but VRSD regularly monitors only 3; these are named the Culbertson, Lang, and Temple wells (respectively, 4N/20W-32H1; 4N/20W-29Q1; 4N/20W-28M1). The Temple well is a background monitoring well, and the Culbertson and Lang wells are compliance points. VRSD owns the Lang well; the Culbertson and Temple wells are privately owned. In 1988, the RWQCB wrote to VRSD that the Temple well

was properly situated but unsuitable for background monitoring because the well's perforated interval was 285' long. The well remains in use as a monitoring well.

Monitoring in the San Pedro Formation has shown at times the presence of VOC's in the groundwater, and potentially of contamination from the landfill leachate. Detected contaminants include:

Well Name	Date of Sample	Contaminant	Concentration
Lang (29Q1)	Jan 1989	Chloroform	1.0 - 3.0 µg/l
Temple (28M1)	Jan 1989	Chloroform	5.9 µg/l
Temple (28M1)	Mar 1989	Trichlorofluoromethane	0.8 µg/l
Lang (29Q1)	Jan & Apr 1992	Bromodichloromethane	1.8 µg/l
		Bromoform	2.4 - 3.0 µg/l
		Chloroform	0.9 - 1.5 µg/l
		Dibromochloromethane	2.0 - 2.3 µg/l

VRSD attributes VOC's detected in the Lang samples to sampling downstream of a chlorination system at the well (all the detected compounds are trihalomethane (THM) compounds). The sampling procedure was changed after April 1992, but it remains unclear how the contamination occurred. Chloromethane was detected in samples from all three San Pedro Formation wells (Temple, Lang and Culbertson) in July 1992. Because this compound was also detected in the field and method blanks, detection in all samples was attributed to improperly preserved sampling containers.

Other chemical constituents of the groundwater sampled from the San Pedro Formation are within maximum contaminant levels for drinking water (or secondary levels established by the State). TDS is typically 500 - 1,000 mg/l.

SURFACE WATER SAMPLING BY UNITED WATER CONSERVATION DISTRICT

During May 1995, UWCD groundwater staff observed water seepage from a canyon wall east of the landfill during an aerial overflight (see Appendices 1 and 2). Subsequent sampling of this water demonstrated high concentrations of several metal constituents. Shown below are those constituents for which concentrations exceeded the Drinking Water MCL (all measurements in mg/l):

Constituent	Amount Detected	Drinking Water	
		MCL	Amount in excess of MCL
Arsenic	0.17	0.05	3.4x
Beryllium	0.008	0.004	2.0x
Cadmium	0.008	0.005	1.6x
Chromium	0.37	0.05	7.4x
Lead	0.097	0.015 or 0.05	2x
Nickel	0.24	0.10	2.4x
Thallium	0.004	0.002	2.0x

From the same sampling, other constituents with relatively high concentrations include (all measurements in mg/l):

Constituent	Amount Detected	Drinking Water	
		MCL	Percentage of MCL Limit
Barium	0.79	1.0	79%
Cobalt	0.075	no MCL established	
Molybdenum	0.055	no MCL established	
Vanadium	0.63	no MCL established	
Zinc	0.81	5.0	16%

Metals are known to occur in such concentrations in hydrothermal groundwater, which could exist in the area (although no hot springs are documented nearby). However, IWT regards that this broad suite of metals in the observed concentrations makes the landfill highly suspect as a potential source. IWT strongly recommends that sampling of this groundwater seep be continued on a monthly or quarterly basis. In addition, it is important to learn the source of such groundwater if it tests repeatedly for these contaminants, and to test the possibility that it has migrated from the landfill.

POTENTIAL FOR CONTAMINANT MIGRATION WITHIN THE REGIONAL GROUNDWATER SYSTEM

Existing documentation of water chemistry which could be attributed to infiltration of landfill leachate to the groundwater regime provides sufficient cause for concern about potential, ongoing contamination of the groundwater supply from

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Constituent	Amount Detected	Drinking Water	
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Cadmium	0.008	0.005	1.6x
Chromium	0.37	0.05	7.4x
Lead	0.097	0.015 or 0.05	2x
Nickel	0.24	0.10	2.4x
Thallium	0.004	0.002	2.0x

From the same sampling, other constituents with relatively high concentrations include (all measurements in mg/l):

Constituent	Amount Detected	Drinking Water	
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Barium	0.79	1.0	79%
Cobalt	0.075	no MCL established	
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Vanadium	0.63	no MCL established	
Zinc	0.81	5.0	16%

Metals are known to occur in such concentrations in hydrothermal groundwater, which could exist in the area (although no hot springs are documented nearby). However, IWT regards that this broad suite of metals in the observed concentrations makes the landfill highly suspect as a potential source. IWT strongly recommends that sampling of this groundwater seep be continued on a monthly or quarterly basis. In addition, it is important to learn the source of such groundwater if it tests repeatedly for these contaminants, and to test the possibility that it has migrated from the landfill.

POTENTIAL FOR CONTAMINANT MIGRATION WITHIN THE REGIONAL GROUNDWATER SYSTEM

Existing documentation of water chemistry which could be attributed to infiltration of landfill leachate to the groundwater regime provides sufficient cause for concern about potential, ongoing contamination of the groundwater supply from

the landfill. Even though the Pico Formation is not highly transmissive, degradation of groundwater quality could occur over long periods of time from the unlined landfill. Of particular concern is the possibility that local, more highly transmissive pathways for groundwater migration exist within or adjacent to the Pico Formation, such as along the Culbertson Fault. It is noteworthy that the groundwater seeps sampled by UWCD are found at the fault contact.

Because the groundwater seep and the 1992 TCE/PCE detection in the shallow Pico Formation sample are the only instances of serious water quality degradation sampled to date, and because the monitoring program in place is limited, IWT recommends that emphasis be placed on improving monitoring at and around the landfill site. Such monitoring is likely to provide a more reliable database for evaluating the potential threat of contamination to groundwater resources, and is particularly important because many older agricultural wells (note the abundance of wells located south of the landfill, as shown in Plate I) provide for hydraulic connection between various aquifer units.

Recommendations

Detection of contaminants PCE and TCE in rising groundwater, detection of suspect contaminants at the seep sampled by UWCD staff, and the location of existing monitoring wells strongly suggest the need for several actions:

- 1) Monitor water quality at the T-1 well;
- 2) Monitor groundwater seeps in the vicinity of the landfill;
- 3) Assess the nature of existing contamination, if any, of groundwater from Toland Road Landfill leachate;
- 4) Remediate any contamination caused by infiltration of leachate from the landfill into the groundwater regime;
- 5) Install additional monitoring wells in the Pico Formation within or near to the refuse containment area (such as the site previously proposed by VRSD, and in locations appropriate to possible groundwater migration along the Culbertson Fault), to determine any existing impacts of the landfill on the groundwater regime and to provide better future monitoring of potential contamination; and
- 6) Install monitoring wells south of the landfill site in the San Pedro Formation in place of, or in addition to, the agricultural wells now used for monitoring in these strata. These wells would also be used to

determine any existing impacts of the landfill on the groundwater regime and to provide better future monitoring of potential contamination.

Careful attention to geologic factors will be critical to proper site selection for any new monitoring wells in either the Pico or the San Pedro formations.

Sincerely,

Norman N. Brown, Ph.D.
Vice President

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DOCUMENT 19
UNITED WATER CONSERVATION DISTRICT
RESPONSE TO COMMENTS

Response 19-1

1. Table 1.1 of the Draft EIR is provided as a summary of the significant environmental impacts identified in the topical sections of Chapter 3.0. The finding included in Table 1.1 that the proposed project would not result in significant impacts to surface water, or the local and regional ground water is supported by the analysis in Section 3.3 of the Draft EIR.

2. While the Draft EIR determined that specific mitigation measures for ground water quality were not required, Section 3.3.5 of the Draft EIR identified the following operational procedures and regulatory requirements that would be implemented as part of the proposed project to assure the protection of ground water:
 - As required by CCR Titles 14 and 23, and Subtitle D, waste disposal areas would be constructed with composite liners and 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.

Response 19-2

1. As indicated in the comment, PCE and TCE were detected in a ground water sample obtained from the onsite "Replacement" well in April 1992, however, this well has not been subsequently sampled due to insufficient quantity of ground water in the well. Because of the lack of ground water for sampling and additional analytical analyses, it has not been determined if the detection of these constituents is representative of ground water conditions or if they are a result of field or laboratory contamination. Additionally, the detected concentrations are relatively low (4.5 µg/L for PCE and 1.8 µg/L for TCE) and are below their respective state and federal maximum contaminant levels (MCLs).

2. In accordance with CCR Title 23, Chapter 15 and the waste discharge requirements (WDRs) for Toland, the April 1992 ground water data was provided to the RWQCB as part of the

quarterly and annual ground water report for Toland. As discussed in Sections 2.5.4 and 3.3.5 of the Draft EIR, a ground water monitoring system would be developed for the proposed project in accordance with CCR Title 23, Chapter 15, Article 5 in consultation with the RWQCB as part of the issuance of the revised WDRs for the proposed project.

Response 19-3

1. See Response 19-2 above.

Response 19-4

1. As indicated in the Section 3.3.2.2.1 of the Draft EIR, the Pico Formation is considered a nonwater bearing unit (see Response 19-5 below), therefore, data regarding water quality or potentiometric surface gradient is very limited from this formation. As part of the permitting of the proposed project and in consultation with the RWQCB, an expanded ground water monitoring system would be developed and implemented at the site to accommodate site-specific hydrogeologic conditions in accordance with CCR Title 23, Chapter 15, Article 5.

Response 19-5

1. The results for the pump test performed in monitoring well T-1 is included in the referenced report *Solid Waste Assessment Test*, Toland Road Landfill, December 1988. The results of the pump test indicate the recharge rate for monitoring well T-1 to be approximately 0.07 gpm. As indicated in the *Annual Report, Ground Water Quality Monitoring Program, Toland Road Landfill*, Staal, Gardner & Dunne, Inc., June 1987, the Pico Formation has been classified as a nonwater bearing unit in several previous studies which include:
 - California Division of Mines and Geology. *Geology and Mineral Deposits of Southwestern Ventura County, Preliminary Report No. 14*. 1973.
 - Mann, J. F., Jr. *A Plan for Ground Water Management*, unpublished consultant's report prepared for United Water Conservation District, with 1969 supplement.
 - County of Ventura, Public Works Agency, Flood Control and Water Resources Department, *Triennial Report of Hydrogeologic Data, 1977 through 1980*. 1981.

Response 19-6

1. As discussed in Response 19-2 and in Sections 2.5.4 and 3.3.5 of the Draft EIR, a ground water monitoring system would be developed for the proposed project in accordance with CCR Title 23, Chapter 15, Article 5 in consultation with the RWQCB as part of the issuance of the revised WDRs for the project. As the process for revising the WDRs is ongoing concurrent with the EIR, it is not possible to provide the specifics for the ground water monitoring system that would be installed to support the proposed project. That level of detail, however, is not required for the EIR and it is sufficient for the EIR to indicate that a ground water monitoring system would be developed in accordance with the applicable regulation and in consultation with the appropriate agency.

Response 19-7

1. As indicated by the comment "...the transitional Las Posas Sand..." is defined differently in various technical references as being either the upper Pico Formation or the lower San Pedro Formation. Field work conducted by Fugro in 1992 and Environmental Solutions, Inc. in 1995 indicate the transition from Pico Formation to Las Posas Sand is gradual and does not display a distinct contact, which would provide a ground water flow conduit.
2. Regarding the Culbertson Fault, extensive trenching was conducted at Toland (Fugro 1992) to determine if the fault is on the site. As discussed in Section 3.2.2.7 of the Draft EIR, Fugro concluded and Rockwell agreed that the Culbertson Fault is not located on the project site. Additionally, work conducted by Kahl (1985) for the California Department of Mines and Geology (CDMG) concluded that the Culbertson Fault does not extend onto the Toland site.
3. As discussed in Responses 19-2 and 19-6 and in Sections 2.5.4 and 3.3.5 of the Draft EIR, a ground water monitoring system would be developed for the proposed project in accordance with CCR Title 23, Chapter 15, Article 5 in consultation with the RWQCB as part of the issuance of the revised WDRs for the project. The ground water monitoring program developed for the proposed project will take into the account the geologic and hydrogeologic conditions at the site to assure that pathways for constituents that could potentially be released by the landfill are monitored.

Response 19-8

1. The composite liner described in Section 2.5.1 of the Draft EIR, is the liner system required by CCR Title 23 and Subtitle D for new or expanded landfills. The composite liner system

included in the regulations has been determined by state and federal regulatory agencies to provide the necessary level of protection for ground water resources.

2. As noted by this comment, the delineated intersections of cross sections A-A' and B-B' in Figure 3.2.8 of the Draft EIR are incorrect. This figure has been corrected and is included in Section 3.2 of this Final EIR. The correction of this figure does not alter the findings or conclusions of the EIR.

Response 19-9

1. The basis for the commenter's issues with the findings of the *Investigation of Surface Water Seeps in the Vicinity of the Toland Road Landfill Ventura County, California* (Environmental Solutions, Inc., 1995d) reflect a difference of technical interpretation of the geologic data. Based on the results of the geologic field study accomplished as part of the investigation of the surface water seep and body of geologic data for the project area, we stand behind the findings included in the Draft EIR regarding the surface water seeps.

Response 19-10

1. While a ground water sample obtained from one of the site monitoring wells contained minor concentrations of PCE and TCE, this well has not been subsequently sampled due to insufficient quantity of ground water in the well. Because of the lack of ground water for sampling and additional analytical analyses, it has not been determined if the detection of these constituents is representative of ground water conditions or if they are a result of field or laboratory contamination. Additionally, the detected concentrations are relatively low (4.5 µg/L for PCE and 1.8 µg/L for TCE) and are below their respective state and federal MCLs.
2. In accordance with CCR Title 23, Chapter 15 and the WDRs for Toland, the April 1992 ground water data was provided to the RWQCB as part of quarterly and annual ground water report for Toland. As discussed in Sections 2.5.4 and 3.3.5 of the Draft EIR, a ground water monitoring program would be developed for the proposed project in accordance with CCR Title 23, Chapter 15, Article 5 in consultation with the RWQCB as part of the issuance of revised WDRs for the proposed project.

Response 19-11

1. As indicated in the *Investigation of Surface Water Seeps in the Vicinity of the Toland Road Landfill Ventura County, California* (Environmental Solutions, Inc. 1995d), the hydraulic conductivity used to calculate the ground water velocity in the Pico Formation was conservative because it was based upon the bedrock containing fractures. The comment implies that structural conduits (i.e., faults, bedding planes and geologic contacts) are present at Toland and the source of the seep identified by UWCD when the field investigations conducted by UWCD did not identify such a feature as the seep source.
2. As discussed in Sections 2.5.4 and 3.3.5 of the Draft EIR, a ground water monitoring system would be developed for the proposed project in accordance with CCR Title 23, Chapter 15, Article 5 in consultation with the RWQCB as part of the issuance of the revised WDRs for the project. The ground water monitoring program developed for the proposed project will take into the account the geologic and hydrogeologic conditions at the site to assure that pathways for constituents that could potentially be release by the landfill are monitored.

Response 19-12

1. As discussed in Response 19-6 above, a ground water monitoring system would be developed for the proposed project in accordance with CCR Title 23 in consultation with the RWQCB as part of the issuance of the revised WDRs for the project.
2. As required by the WDRs for the existing landfill, VRSD provides annual and semi-annual ground water monitoring results to the RWQCB. As the agency responsible for protecting the ground water resources of the state in accordance with CCR Title 23, the RWQCB is responsible for issuance of WDRs for landfills, for reviewing ground water monitoring results, and for requiring landfill owners/operators to evaluate potential contamination identified by ground water monitoring data. Based on the annual and semi-annual ground water monitoring results, the RWQCB has not been required VRSD to conduct a specific ground water evaluation at Toland pursuant to CCR Title 23.

SECTION 2.4

**ORGANIZATIONS/BUSINESS
COMMENTS AND RESPONSES**

To: Clinton L. Whitroy

From: PAUL A. Ramero



Date: Oct 16 1995 OCT 18 1995

V. R. S. D.

I am Against the proposed Expansion of the Toland Rd Dump. I feel that the Noise, dust, traffic & potential Health Risk will severely hamper and create an uncomfortable life for me & my family.

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I do not feel that these problems can be ever be mitigated satisfactorily

Sincerely
Paul Ramero

Paul Ramero
577 HALL RD.
SANTA BARBARA CA.

93068 900F329 Rev 11/90

M-29

DOCUMENT 20
CALAVO - PAUL ROMERO
RESPONSE TO COMMENTS

Response 20-1

1. The commenter's opposition to the proposed project is noted.

2. The potential impacts from noise, dust, and traffic, and the potential health risks associated with Toland were evaluated in detail in the Draft EIR (see Sections 3.10, 3.12, 3.11 and 3.13, respectively). As summarized in Section 1.3.2 of the Draft EIR and discussed in detail in the topical sections of Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR, with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

3. CEQA provides authority to the lead and responsible agencies to approve a project which may result in significant unavoidable environmental effects. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impacts associated with the proposed project.

COALITION TO STOP WELDON CANYON DUMP

323 E. Matilija #110-260
Ojai, CA 93023

TO: Ventura County Regional Sanitation District
ATTN: Toland Road Landfill Project Manager

VIA FAX: 658.4633

CONTACT:

Chris Westphal: 646.2460
Ellen Sclarz Shapiro: 646.7484

Lastly, expansion of Toland would perpetuate a bloated bureaucracy whose purposes—creating and maintaining landfills—are in opposition to progressive and more environmentally sound trash-handling methods. These include not only recycling, but trash-to-energy, and other high-technology conversion processes, whereby trash can be used as a valuable resource, rather than something to be buried in the ground.

Thank you,

Chris R. Westphal

STATEMENT IN OPPOSITION TO PROPOSED EXPANSION OF TOLAND ROAD LANDFILL

The Coalition to Stop Weldon Canyon Dump believes that expansion of the Toland Road Landfill is unnecessary, and detrimental to the best interests of Ventura County.

As you are undoubtedly aware, the cities of Ojai, Santa Paula, Ventura, and Fillmore have recently established a Joint Powers Authority, which will be responsible for securing disposal sites at favorable rates. Bids from eight companies have already been received, and—while a bidder has not yet been selected—the message is clear. An abundance of landfill space is available, including Chiquito Canyon, Calabasas, Bolo Station, and others. These sites offer competitive rates, and are already permitted and operating.

Expanding the Toland Road Landfill would involve the expenditure of millions of dollars of taxpayers' money, while gaining the county nothing in terms of economic savings. Indeed, it would probably be another money-losing proposition, subjecting rate-payers to higher-than-market rates, and saddling Ventura County taxpayers with massive cleanup costs at the time of closure. This has, and is, occurring already at Bailard Landfill, also run by the VRSD.

Expansion of the Toland Road Landfill would also threaten Ventura County's position as recycling leader. As the expansions of recycling centers in Ventura and Ormond demonstrate, recycling not only creates jobs and new products, but reduces the waste stream. Expanding a landfill only encourages waste.

DOCUMENT 21
COALITION TO STOP WELDON CANYON DUMP
RESPONSE TO COMMENTS

Response 21-1

1. Chapter 4.0 of the Draft EIR included a detailed analysis of alternatives to the proposed project, including diversion to out-of-County landfills by truck, and diversion to an out-of-County landfill via rail-haul. As discussed in Chapter 4.0 of the Draft EIR, none of the alternatives would eliminate or reduce significant impacts associated with the proposed project at Toland. In fact, the alternatives would have similar or greater environmental impacts than the proposed project.

2. Regarding the three landfills offered as examples in this comment, Chapter 4.0 of the Draft EIR provided the following information regarding their availability to accept waste from west Ventura County:
 - **Chiquita Canyon Landfill (Chiquita):** As currently permitted, Chiquita could only accept Ventura County waste until November 1997, when its CUP expires. While a proposed expansion is being considered that would extend the service life of Chiquita until approximately 2006, it is speculative as to whether Chiquita will be an operating landfill. If Chiquita is not expanded, waste from the west County and the Santa Clara Valley would have to be diverted to another landfill(s) beginning in November 1997.
 - **Calabasas Landfill (Calabasas):** Calabasas is operated by the Los Angeles County Sanitation Districts. A watershed ordinance adopted by the County of Los Angeles for this landfill limits its service area. Under the ordinance, Calabasas is allowed to accept waste from Ventura County based on historic importation patterns. Specifically, only waste from Thousand Oaks, Newbury Park, Oak Park, and surrounding areas can be accepted. This landfill, therefore, does not represent a short-term or long-term waste disposal alternative for waste from the west County or the Santa Clara Valley.
 - **Rail•Cycle-Bolo Station Landfill (Bolo Station):** Since the release of the Draft EIR in September 1995, the County of San Bernardino has conditionally approved Bolo Station. The approval is conditioned upon the approval by the voters of San Bernardino County of a business tax associated with importing waste to Bolo Station. The business tax is on the March 1996 ballot. Also on the ballot in March 1996, is a public initiative that would change the San Bernardino County zoning ordinance to prohibit large landfills, such as Bolo Station, from being sited within 10 miles of an aquifer. If the business tax is approved in March 1996, and the ballot initiative is not approved, Rail•Cycle estimates that the Bolo Station may be permitted, constructed and operational by the fall of 1998. Therefore, under no set of circumstances would Bolo Station be able to

meet the short-term waste disposal requirements of the west County or the Santa Clara Valley, and it remains speculative as to whether this landfill will become operational.

Response 21-2

1. The staff of VRSD has provided the VRSD Board of Directors with detailed information regarding the economics of the proposed project. The Board of Directors will consider this economic information along with the EIR as it makes its decision regarding the proposed project.
2. The funds for closure, and postclosure monitoring and maintenance are collected by VRSD on an ongoing basis as required by CCR Titles 14 and 23, and would be included in the tipping fees established for Toland.
3. There are "no cleanup requirements" at Bailard. As part of the closure of Bailard, a final cover is being installed on a phased basis as required by CCR Titles 14 and 23, and Subtitle D. The cost for closure is required for all landfills, and the closure requirements are not unique to Bailard.

Response 21-3

1. As discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion programs implemented by the County and its cities under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County only has nine years of remaining landfill capacity (County, 1995a). Since the County cannot demonstrate 15 years of landfill capacity as required by AB 939, VRSD proposes to expand Toland to meet a portion of the long-term landfill capacity requirements for the County.
2. While certain types of projects are known to create a "demand" for development, there is no evidence that by providing capacity for disposal of solid waste or that the presence of a landfill increases the volume of waste generated. Rather, the proposed project would provide for the environmentally safe disposal of the remaining 50 percent of the waste stream after the County and its cities meet the requirements of AB 939 to reduce the volume of solid waste requiring disposal by 25 and 50 percent by 1995 and 2000, respectively.

Response 21-4

1. Chapter 4.0 of the Draft EIR included a detailed analysis of alternatives to the proposed project, including increased recycling and waste-to-energy. None of these alternatives would eliminate or reduce significant impacts associated with the proposed project at Toland. In fact, as noted in Chapter 4.0 of the Draft EIR, these alternatives would have similar or greater environmental impacts than the proposed project.

2. Also as discussed in Section 1.2.2.2 of the Draft EIR, even with the diversion programs implemented by the County and its cities under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County only has nine years of remaining landfill capacity (County, 1995a). Since the County cannot demonstrate 15 years of landfill capacity as required by AB 939, VRSD proposes to expand Toland to meet a portion of the long-term landfill capacity requirements for the County.

Kimball Ranches - El Hogar

Ranch: Timber Canyon Road Santa Paula California
Office: 89 Pico Court Compton California 93030

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RECEIVED
NOV 06 1995

November 3, 1995

ACCOUNTING

General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003-5562

Ref: Toland Road Landfill Expansion Draft Environmental Impact Report

Dear Sir:

In accordance with your NOTICE OF AVAILABILITY OF AN ENVIRONMENTAL IMPACT REPORT, dated September 21, this letter contains information that should be addressed in the Toland Road Landfill Expansion Environmental Impact Report.

According to the project description, the Ventura Regional Sanitation District is proposing an expansion of the Toland Road Landfill which would result in a:

1. 600% increase in the size of the landfill (2.5 to 15 million tons),
2. 1,100% increase in the daily usage (135 to 1500 tons per day),
3. 210 feet increase in the final height of the landfill (1225 to 1435 ft. elevation),
4. 1,900% increase in the number of people working at the landfill (2 to 40).

Clearly, this is a very large expansion of the Toland Road Landfill.

The following comments should be addressed in your next Draft Environmental Report:

1. Traffic Par. 2.4
 1. Why is the projected traffic count based on 1,300 tons per day if the landfill is to be permitted for 1,500 tons per day?
 2. Why does your "worst case" only require 405 vehicles per day for 1,300 tons of trash (3.2 tons per vehicle average) if it currently take seventy vehicles per day to haul less than 135 tons per day to Toland (1.9 tons per vehicle average)? How do you justify this assumption of a 68% increase in the average payload?
 3. Based on 1,500 tons per day and 1.9 tons per vehicle, the daily traffic count would be 789 vehicles, NOT 405.
 4. What is the current traffic count at the Baillard Landfill? Why is it not referenced in your report?
 5. How do you justify your "projected" "worst case" [sic] traffic count of 405 vehicles?

1

2. Surface Water Par. 3.3.3.1.3

1. Your "preliminary, conceptual level analysis" calculations indicate an increase in the rate of rain water runoff from the landfill surface of 107 cfs or nearly 45,000 gallons per minute. This amounts to one acre-foot of water every seven minutes, or one million gallons of water every twenty-two minutes! This is a very substantial volume of water to detain and clear of sediment.
 2. What size detention basin will be required to collect the runoff water from a 100-year flood on 110 acres of impervious clay?
 3. Will the basin be required to have permits as a reservoir or dam?
 4. What will be the maximum water release rate from this detention basin?
 5. What will be the method of release?
 6. How will the release be controlled?
 7. How will the release be monitored?
 8. Will mosquitos breed in water held in the basin?
 9. How will animals and children be kept out of the basin?
 10. How will you eliminate the sediment before the water is released from the detention basin?

2

3. General Wildlife Par. 3.4.2.2

1. Why is there no mention of the bears which live in the area? What species are they? Are they a sensitive species?

3

4. Site Ca-Ven-(KB-4) Par. 3.6.3.1.1

1. How can you make any estimation whatsoever of the archaeological significance or extent of this site without any assessment?
2. Why was no effort made to evaluate the site beyond noting the presence of poison oak?
3. What efforts will be required to ensure that this site does not have significant features which extend into the area of land altering activities, before these activities begin?

4

5. Safety

1. You conclude that a turning lane on Highway 125 of forty feet is more than adequate. How long is a transfer truck? How many transfer trucks will fit in a forty foot long left turn lane?
2. The Toland road grade is acknowledged to be dangerous. It has already claimed one life. What will be the consequence of a truck or pickup brake failure resulting in that vehicle arriving out of control at Highway 126?
3. Will no danger mitigation occur until there is an accident?

5

6. Fugitive Dust Par 3.8.3.2.2

1. The use of the Piru APCD monitoring station for comparison purposes is invalid.
 1. The monitoring station is on the floor of the valley, not several hundred feet above it, as are the Toland Landfill and the surrounding farms.
 2. Piru is in a narrow portion of the valley where a significant portion of the

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valley floor consists of open dry river bed made up of silt and fine sediment which is easily picked up by winds.

2. The farmlands in the vicinity of the Toland Landfill depend on the cultural advantages of the relatively clean air in the area, compared to the farmland on the valley floor. This advantage is a major factor in offsetting the disadvantages of low water availability, rough terrain and rocky soils.
3. Comparisons to landfills in Pomona and Riverside are irrelevant without a complete evaluation of the conditions of operations of those landfills, the soil types, the ambient air quality, etc.
4. Why is there no mention of the dust conditions and effects on surrounding agriculture at the Bailard Landfill currently operated by the VRSD?
5. Why were the farms around Bailard not surveyed and evaluated?
6. How will the dirt and mud carried onto Toland Road, on the tires, fenders, and mudguards of the vehicles, be eliminated before it dries and turns into dust and is deposited on the surrounding trees by the passing trucks?
7. How will you keep the 110 acres of bare dirt wet enough in a strong East wind condition to prevent a mini-dust-bowl?
8. How will you mitigate the effects of the projected $0.54\mu\text{g}/\text{m}^3$ dust deposited on surrounding orchards?

2.4.8

7. Liner Systems Par. 2.6.1.3

1. Why is nearly half of the landfill area not going to have a liner, only a one foot thick layer of dirt?
2. If this was a new landfill would it be required to have a complete liner system?
3. Why is the complex liner system required on the new landfill area if the one foot thick layer of dirt with a leachate recovery system is sufficient for nearly half of the landfill?
4. Why are "expected" and "calculated" moisture contents used to evaluate the risk of leachate squeezing from the waste currently in the Toland Landfill? Why have no measurements been done to accurately evaluate the moisture content?

8. Water Use

1. What will be the actual water savings due to the measures to be implemented as stated in Par. 3.3.3.1.2.4? I suggest they would be so small as to be "insignificant."
2. How can you withdraw 30 acre feet of water from the Fox Canyon Aquifer (Rio Plaza Water Co.) without increasing the amount of water withdrawn? You are confusing water allotment with water withdrawal. If you are withdrawing 30 acre feet which are not now withdrawn, clearly you are increasing the withdrawal by 30 acre feet. Your logic in Par. 3.3.3.1.2.7 is wrong.
3. Any water withdrawn in the area of the landfill will fall under the jurisdiction of the Fillmore/Piru Basin Groundwater Management Plan now being developed. What will the impacts of this plan be on your proposed water sources?
4. There are water wells in the vicinity of the Toland Landfill which are high up the slope from the river and the main aquifers. Among these wells are the Lang well,

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the Hardison wells and a well owned by Kimball Ranches, to name just a few. These wells are not in a large aquifer. They are relatively shallow and low producing. However, they do serve as the sole source of water for residences and farmland that would otherwise have no economic source of water. Water withdrawal from any new well in the water bearing structures which supply these wells could affect these marginal wells. Any reduction in the quantity of water produced by any of these wells will have serious consequences.

5. How will your sources of water be affected in the event of a drought/overdraft condition when water extractions become subject to restriction? How will you continue to acquire the quantity of water required to maintain the standards of your operations? What priority will you have based on the fact that you are a new user and an expropriator of water?
6. On what basis is water use projected to be reduced by 75% in December through March? Based on our experiences farming in Timber Canyon, this reduction in water requirement is valid only in conditions of weekly rainfall, a very rare occurrence. In fact, rainstorms are frequently followed by a period of dry blustery north winds which immediately dry the surface of the soil. Dust usually becomes a problem within a couple of days of the end of a rainfall.
7. What is your projected water use rate in the winter months in the event of no significant, rainfalls as recently occurred?

9. Frost Effects Par. 3.8.3.2.2

1. Using the combined Timber Canyon and O'Leary Creek airsheds to evaluate the potential frost damage impacts is out of scale with the factors influencing frost damage in the surrounding orchards.
1. The frost damage in the lemon and avocado orchards in the vicinity of Toland Road is very sensitive to the movement of air.
2. On our ranch in Timber Canyon there are areas which almost never suffer damage and there are areas which suffer some damage nearly every year.
3. The difference between damage and no damage can be as little as a twenty-foot elevation change.
4. Any change in ground height which blocks or diverts the down-canyon and down-valley drifts or results in still or pooling air will allow the setting of colder air to the ground causing a decrease in the local air temperature.
5. The difference between frost damage and no damage can be as little as three degrees Fahrenheit.
6. Filling the side canyon will result in changed airflow down O'Leary Canyon. A significant side-flow component will disappear.
7. This altered flow will change the pattern of the airflow out of O'Leary and Timber Canyons.
8. This project will result in the blockage in air movement equivalent to a twenty-two-story building 110 acres in size.
9. Any land feature of this magnitude will inevitably alter the frost damage patterns in the area.

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CONT.6
CONT.

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10. Litter and Dumping

1. How will wind-born trash, such as plastic grocery bags, be controlled?
2. How will six feet high fences prevent lightweight materials such as plastic grocery bags, from being carried off-site in a strong wind?
3. How can you possibly believe that illegal dumping will decrease around the Toland Landfill with a tenfold increase in landfill activity as you state in Par. 3.14.3.1.3.5? This conclusion defies common sense.
4. What is the current rate of illegal dumping around the Ballard Landfill?
5. What is the current rate of vandalism related to illegal dumping around the Ballard Landfill?
6. Who will be responsible for hazardous and toxic waste dumped in the orchards along Toland Road after it is refused at the Landfill?
7. How will a Vehicle Code regulation which is unenforced prevent trash from blowing out of vehicles on Toland Road and Highway 126?
8. Who will be responsible for the cleanup of illegal dumping in the orchards along Toland Road when ownership of the trash cannot be proven?
9. What specifically are the "onsite and offsite efforts by VRSD" to reduce illegal dumping referred to in Par. 3.14.6.3?

11. Interim Drainage Par. 2.5.3.1.3

1. Why does the runoff water from around the operation and maintenance center need to be collected in sumps and hauled to a wastewater treatment facility?
2. What possible industrial operation, which would be allowed a permit to operate today, would result in the degradation of rainwater runoff to such an extent that it would require special processing?
3. What would cause the degradation of the water?
4. What type of treatment would be required?
5. Where will the materials which have been removed from the water be taken?

12. Sewage Sludge

1. What is the projected quantity of sewage sludge to be accepted at Toland?
2. What is the liquid content of sewage sludge?
3. What volume of liquid will the sewage sludge contribute to the landfill mass?

13. Landfill Gas Collection and Removal System Par. 2.5.5.4

1. For how many years will the flare systems continue to operate?
2. Will the flare operate twenty-four hours a day, seven days a week?
3. How will the flare operation be monitored?
4. What will be the impact of the light associated with the flare operating at night on the animals living in the area?
5. How visible will the flares be at night to the nearby residences and on highway 126?
6. How will you eliminate the flare as a potential brush fire starter? High velocity, swirling East winds, especially in the vicinity of side-valley canyons, often pick up and carry dry plant matter such leaves. If ignited by heat or direct contact

with the flame this plant material could easily ignite a brushfire.

14. Brush fires.

1. How will you mitigate the very real potential of starting a brushfire, either by your operations, personnel, or trash haulers, on access roads or on-site?

15. Noise

1. Why is there no consideration given to the additional noise generated by trucks climbing or descending the 7% grade of Toland Road? Obviously they will make substantially more noise than when cruising on a flat road.

16. Vehicle Emissions

1. Are the vehicle emissions rates used in your calculations representative of diesel trucks climbing and descending the Toland Road grade?
2. Do vehicles emit greater quantities of pollutants when climbing and descending steep grades than when driving on flat roads?
3. What will be the realistic average wait time for left turns from Highway 126 onto Toland Road? Based on our experience every day making a left turn off highway 126 onto Timber Canyon Road, I can guarantee it will be more than the zero to one second used in the calculations.
4. Why was vehicle data from El Sobrante Landfill used instead of Ballard Landfill?

I look forward to reading your careful and complete analysis of each of the above impacts of the proposed Toland Road Landfill Expansion in the next Draft Environmental Impact Report.

Please contact me if I can be of any assistance.

Sincerely,

Bobin E. Kimball
 Gordon E. Kimball
 Managing Partner

- Cc. Supervisor Maggie Kildee
 Santa Paula City Council Members
 Fillmore City Council Members
 Mr. Thomas Kaufman, Local Enforcement Agency, Ventura County Environmental Health Division

- Mr. Lowell Preston, Water Resources and Development Department, Ventura County Public Works
 Mr. Robert Ghirelli, Water Quality Control Board - Los Angeles Region
 Mr. Chuck Thomas, Air Pollution Control District
 Mr. Robert M. Sawyer, Muegenberg, Norman & Dowler

**DOCUMENT 22
KIMBALL RANCHES - EL HOGAR
GORDON KIMBALL - MANAGING PARTNER
RESPONSE TO COMMENTS**

Response 22-1

1. The traffic analysis is based on the maximum permitted daily waste capacity of 1,500 tpd for the proposed project. The 1,500 tpd of waste is the maximum that could be disposed at Toland under the permits for the proposed project and is conservatively based on 1,300 tpd from the west County and the continued disposal of 135 tpd from the Santa Clara Valley. The 1,300 tpd included in the paragraph referenced in this comment applies to the portion of waste which would originate in the west County and is currently disposed at Bailard.
2. As discussed in Section 2.4 of the Draft EIR, waste from Santa Clara Valley is transported to Toland by a combination of commercial packer trucks, private haulers using various types of trucks, and landscapers using pickups or stakebed trucks. A review of landfill records indicates that a maximum of 70 vehicles per day travel to the landfill. Although the traffic analysis uses the maximum to assure a conservative analysis, the current average number of vehicles hauling waste to Toland is lower (approximately 40 vehicles per day). The existing average waste load to transport the 135 tpd to Toland, is therefore approximately 3.4 tons.
3. Under the "worse case" traffic scenario for the proposed project, waste from the west County would be transported to the landfill via commercial "packer" trucks. The waste capacity of a packer truck is approximately 8 tons. The average waste load for the proposed project, would therefore, be sufficiently higher than the average load of approximately 3.4 tons under existing conditions.
4. The projected traffic flow for the proposed project by vehicle type is included for both the "proposed case" and "worse case" traffic scenarios in Appendix F of the Draft EIR. The number of vehicles for the "worse case" scenario are based on existing operations at Bailard. The footnotes included in Table F.2 of Appendix F provide the assumptions used in the methodology as well as waste transport data from Bailard's record for 1994.

Response 22-2

1. Based on the volume of stormwater that could flow from the site during the 100-year, 24-hour storm event, the detention basin would be approximately 250 feet by 150 feet and 10 feet

deep. Construction of the detention basin would require a National Pollution Discharge Elimination System Permit (NPDES) from the RWQCB under the Federal Clean Water Act as a point source discharge for stormwater, and would require a building permit from the County Building and Safety Division.

2. The maximum water release rate from the detention basin would be equal to the current stormwater discharge rate from the site for the 100-year, 24-hour storm event. Based on the preliminary hydrology calculations in Appendix C of the Draft EIR, the current stormwater discharge rate from the site is estimated to be 337 cubic feet per second (cfs). The detained stormwater would be released from the basin via a pipe size to limit the outflow to a maximum of 337 cfs. As the release of water from the detention basin would be through a pipe sized to a maximum of 337 cfs, there would be no requirement to monitor the outflow volume. The detention time in the basin provides the mechanism through which the sediment in the water settles to the bottom of the basin. Collected sediments would be removed routinely as part of regular maintenance activities at the landfill.
3. The basin would be for detention not retention, therefore, there would be no standing water in the basin. Detention basins are design for stormwater to be detained for a short period of time to equalize runoff. Typically, water would not remain in the detention basin for longer than 24 hours. Therefore, the detention basin would not create an environment for breeding of mosquitoes. The basin would be fenced to prevent entry by people and animals.

Response 22-3

1. During the biological survey completed for the proposed project, no bears or bear signs (tracks or scat) were observed (Hunt, 1995). In addition, based on information provided by the California Natural Diversity Data Base, there are no species of bear listed as threatened or endangered (CDFG, 1995).

Response 22-4

1. The cultural resource investigation conducted for the proposed project was accomplished in accordance with U.S. Secretary of the Interior's standards and guidelines for the investigation of archaeological resources. As discussed in Section 3.6.2.2 of the Draft EIR, the investigation included an archival records review and pedestrian survey. The purpose of the investigation was to determine if potentially significant cultural resources may be present within the project site.

2. Pedestrian surveys are not intended to answer all questions regarding potential cultural resources on a specific site, rather, they are intended to determine if a cultural resource has the potential to be significant. As discussed in Section 3.6.2.2.1 of the Draft EIR, the rockshelter (CA-Ven-[KB-4]) was determined to be potentially significant as the roof of the feature is fire-blackened and fire-affected rock occurs in the site vicinity. Due to its location near a permanent water source (i.e., O'Leary Creek and the Santa Clara River) and the known use of similar rock features by prehistoric and/or historic peoples as shelter, CA-Ven (KB-4) was determined to represent a potential cultural resource site for purposes of CEQA and the EIR.
3. While the site could not be completely assessed due to a dense cover of poison oak, sufficient information was gathered regarding the physical condition and location of the site to determine that it has the potential to represent a significant cultural resource. As discussed in Section 3.6.2.2.1, it was possible to record the dimensions of the rockshelter, the fire-affected and fire-blackened nature of the site, and its physical location to a permanent source of water (i.e., O'Leary Creek and the Santa Clara River).
4. Since CA-Ven (KB-4) would not be disturbed by the proposed project, CEQA does not require any additional analysis of the site to determine definitively whether it is a significant cultural resource. As discussed in Section 3.6.7 of the Draft EIR, to assure that the site is not impacted by the proposed project, the following mitigation measures are included in the EIR:
 - Monitoring of site CA-Ven (KB-4) shall be conducted by a professional archaeologist when grading, construction, or other project-related activities are conducted in the immediate vicinity of this potentially important archaeological site.
 - Should future operations or construction design changes be planned that have the potential to affect site CA-Ven (KB-4), the following actions are recommended to assure that impacts remain below a level of significance:
 - 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.

Response 22-5

1. As discussed in Section 3.11.3.1.2 of the Draft EIR, the length of the left turn pocket at the Toland Road/Highway 126 intersection is approximately 120 feet. The turn pocket exceeds the minimum length required pursuant to the Caltrans Highway Design Manual (Caltrans, 1995).

The Caltrans design standard for left-turn vehicle storage is based on the number of turning vehicles likely to arrive in an average two minute period during the peak hour (Caltrans, 1995). If the number of trucks during the peak hour represent 10 percent or more of the traffic volume, left-turn vehicle storage space for a minimum of one passenger car and one truck should be provided. As shown in Table 3.11.2, trucks average approximately 11.5 percent of the traffic at the Toland Road/Highway 126 intersection. Based on the peak hour estimate for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The design standard for the left-turn vehicle storage length would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car).

2. Under the "proposed case" and the use of transfer trucks, during the peak hour a waste truck would arrive at the intersection an average of once every 10 minutes. Based on the longer truck length for transfer vehicles, the required left-turn storage length for the "proposed case" would be 85 feet (60 feet per transfer truck and 25 feet for the passenger car). Based on the Caltrans design standard, therefore, depending on whether packer trucks or transfer trucks are used, the required left-turn pocket length at the intersection of Toland Road and Highway 126 would range between 65 feet and 85 feet. The existing 120-foot left-turn pocket and configuration at this intersection and approach lanes, as shown in Figure 3.11.3 of the Draft EIR, provides waste trucks and other vehicles adequate distance to safely approach the intersection.
3. This comment also expressed a concern regarding the steep grade of Toland Road and the accident risk associated with potential vehicle brake failure. This issue was addressed in Section 3.11.3.1.3 of the Draft EIR. As discussed in that section, a primary reason for trucks "losing their brakes" is overheating of the brakes over long, steep grades. Considering the grade of Toland Road, the Draft EIR reviewed the Caltrans guidelines for mitigating this potential hazard. Potential mitigation measures include warning signs for steep grades and for trucks to use low gear, and in some cases, the installation of a truck escape ramp. As concluded in Section 3.11.3.1.3, based on the Caltrans' guidelines, a truck escape ramp is not warranted on Toland Road.

Response 22-6

1. The background PM₁₀ data from the Piru monitoring station was used for purposes of the Draft EIR based on a recommendation from APCD. Subsequent to preparation of the Draft EIR, APCD indicated that PM₁₀ monitoring data was available from the SP Milling

project at Sycamore Ranch, located approximately 1.7 miles southeast of Toland Road Landfill. The PM₁₀ monitoring stations at Sycamore Ranch are located at an elevation of approximately 500 feet, which is approximately 500 feet lower than the southwest corner of the landfill footprint. The lateral and vertical proximity (1.7 miles and 500 feet, respectively) of these monitoring stations to the landfill assure reasonable representativeness for the PM₁₀ monitoring data.

2. An evaluation of the Sycamore Ranch data provided by APCD indicates that the arithmetic mean PM₁₀ concentration during the period of October 1994 through August 1995 was 15.1 µg/m³, which is 52 percent of the 1994 annual arithmetic mean of 29.1 µg/m³ at Piru. The comment's observations regarding the proximity of the Piru monitoring station to the dry bed of the Santa Clara River may partly explain why the PM₁₀ concentration measured at the Piru station in 1994 (29.1 µg/m³) is almost twice that measured at Sycamore Ranch.
3. Combining the Sycamore Ranch PM₁₀ concentration data with the model data, the range of potential PM₁₀ concentrations in nearby orchards (i.e., up to 0.68µg/m³) that could be generated by the proposed project represents only 4.5 percent of the baseline concentration of PM₁₀ in these orchards.
4. Although no two landfills are identical, the observations of no adverse impacts on agriculture at Spadra and Highgrove landfills support the discussion of PM₁₀ concentration at Toland, which concludes that the proposed expansion will not adversely impact the health and productivity of orchard trees and other plants in the vicinity. According to Barnes (1993), vehicular travel on dirt roads within agricultural areas may emit sufficient fugitive dust to adversely impact plants.
5. A special survey of potential impacts of fugitive PM₁₀ on agricultural plants around Bailard was not accomplished because of the following reasons:
 - The potential impact at Bailard was expected to be as small as at Toland.
 - Travel on dirt roads in agricultural areas around Bailard, Toland or other landfills are believed to be far more important contributors of fugitive PM₁₀.
 - It would be difficult to implement a field survey capable of discriminating different source contributions to PM₁₀ depositing (settling) on agricultural plants.

6. In response to this and other comments, a mitigation measure has been included in the EIR to install a wheel washing station that vehicles leaving the landfill active working face on the dirt road would pass through at the "apron," which is the transition section at the end of the paved road where it becomes a dirt road. The inclusion of this mitigation measure in this Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.
7. The wheel washing station would work in conjunction with the mitigation measures included in Section 3.12.7 of the Draft EIR that require the apron to be flushed with water often enough to assure that the tires cannot track out dirt or mud, and that the onsite paved road shall be swept or water flushed. This combination of measures would significantly reduce the amount of dirt vehicle tires would carry onto Toland Road.
8. At any point in time, only a small area of dirt cover borrow material, dirt road, and dirt working area in front of the active face would be exposed and subject to wind erosion. These areas are treated (e.g., watered) to minimize fugitive dust emissions. Dirt areas of the landfill that make up the rest of the cover borrow piles, top deck of the landfill, and elsewhere that are not being actively disturbed by equipment are treated with water or chemical dust suppressants to sufficiently eliminate emissions of fugitive dust.
9. The revised maximum PM_{10} concentration that the proposed project might add to the background PM_{10} concentration in the orchards in the vicinity of Toland is $0.68 \mu\text{g}/\text{m}^3$. Deposition is a process that varies linearly with the airborne concentration, and hence, will not increase more than the 4.5 percent discussed earlier in this response. This potential increase in deposition will not have a measurable impact on the health and productivity of orchard trees and other agricultural plants near the landfill.
10. Based on this and other comments, a mitigation measure has been included in the EIR that shall require VRSD to pave, or pay the cost to pave, unpaved roads in the vicinity of Toland to mitigate PM_{10} generated by the proposed project. The linear feet of unpaved road to be paved shall be developed in consultation with the APCD and shall be sufficient to offset the PM_{10} concentrations from project sources (i.e., offsite mobile emissions and onsite emissions). Based on a preliminary analysis, paving approximately 27,500 linear feet (i.e., approximately 5.2 miles) of unpaved roads in the vicinity of Toland would offset the PM_{10} generated by the "worse case" traffic scenario (i.e., 450 vehicles per day versus the "proposed case" of 210 vehicles per day). The actual linear feet of unpaved road required to be paved to offset

the PM₁₀ generated by the proposed project would be based on the number of vehicles traveling to the site on a daily basis. Therefore, potential impacts from the emission of fugitive dust from these dirt roads before paving will be decreased the same amount that the potential impact of the PM₁₀ emissions from the proposed project. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 22-7

1. The proposed project consists of both a vertical and lateral expansion of Toland. The vertical expansion component of the proposed project includes the placement of additional waste on top of waste already landfilled at the site. Vertical expansions of existing landfills are allowed by state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) without a requirement to excavate previously landfilled waste to allow the installation of a composite liner system. Lateral expansions of existing landfills are required by state and federal regulations to include a composite liner system. Therefore, based on state and federal landfill regulations, the proposed project includes a composite liner for the lateral expansion component of the project.
2. As discussed in Section 2.5.1 of the Draft EIR, for the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot thick low permeability intermediate soil barrier would be installed. The intermediate soil barrier is not required by state or federal landfill regulations for vertical expansions, however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.
3. Regarding the calculated moisture content of waste landfilled at Toland, the use of published data and data from other landfills is reasonable in analyzing this project.

Response 22-8

1. The largest single use for water at Toland under the proposed project would be for dust control. As discussed in Section 3.5.3.1 of the Draft EIR, it is estimated that during the warmer/dry months, approximately 40,000 gallons per day (gpd) of water would be used for dust control. This volume is based on the mitigation measure included in Section 3.3.7 of the Draft EIR that requires the use of all-weather roads (i.e., paved and crushed rock) to reduce

the amount of water required for dust control. Without this mitigation measure and other dust control measures included in Section 3.12.7 of the Draft EIR that do not rely upon water, VRSD estimates that during warmer/drier months that up to 60,000 to 80,000 gpd would be required for dust control. Therefore, the nonwater dust control measures would result in a significant water savings.

2. The projected reduction in water usage for dust control measures during the winter months is based on VRSD's experience at Bailard. During the summer months, watering of unpaved roads would occur several times a day, while during the winter months, even during periods without rain, it is expected that adequate dust control can be achieved by watering only once or twice a week. In addition, after a rain, a "crust" occurs on the ground surface, as vehicles would be limited to designated roads on the project site, the majority of the site would not be disturbed and this "crust" would remain in place. The "crust" significantly reduces dust for several weeks as long as it is not disturbed.
3. As discussed in Section 3.3.3.1.2, paragraph 7 of the Draft EIR, the potential use of 30-acre feet from the Rio Plaza Water Company (Rio Plaza) is within the existing allotment of Rio Plaza. The effects of the withdrawal of Rio Plaza's entire allotment has been taken into account by the United Water Conversation District and the Fox Canyon Ground Water Management Agency. Therefore, for purposes of managing ground water resources, the two water agencies assume that Rio Plaza uses its entire allotment. Therefore, the effects of Rio Plaza providing 30-acre feet of water to the proposed project from its existing allotment has in fact been considered.
4. When the pending Fillmore/Piru Basin Groundwater Management Plan is implemented, VRSD will determine what, if any, effect the plan has on the potential water sources for Toland. As one or a combination of the three sources of ground water identified in the Draft EIR would be able to support the proposed project, the implications of the pending ground water management plan are not issues that must be addressed in the EIR.
5. If detailed hydrogeologic investigations determined that a new well to supply the proposed project could affect adjacent wells, VRSD would evaluate its options. As one or a combination of the three sources of ground water identified in the Draft EIR would be able to support the proposed project, VRSD has sufficient options to provide water to the site without affecting ground water supplies in the area.

Response 22-9

1. As discussed in Section 3.8.3.2.2 of the Draft EIR, the combined Timber Canyon and O'Leary Creek airsheds contain the volume of air that could possibly be impacted by the proposed project. The analysis in the Draft EIR considered the maximum geographical extent for possible frost effects.
2. The discussion of frost in the Draft EIR agrees with the comment about the importance of movement of air to frost formation (see paragraphs 6 and 7 on page 3.8-33 of the Draft EIR). The observation made by this comment that "... there are areas which almost never suffer damage and there are areas which suffer some damage nearly every year" results from micrometeorological differences in complex terrain and the existence of topographical "frost pockets."
3. The comment correctly notes that it does not take much of an elevation change to create a frost pocket, but it omits the related conclusion that incidence of frost in a pocket will not be affected by a change in the topography from the proposed project which is calculated to represent a 0.5 percent reduction in the air volume of the combined Timber Canyon and O'Leary Creek airshed. The proposed project would change "ground height" in the landfill within the side canyon, where no agriculture exists, but would not "block" nor "divert" down canyon/down valley air flow where agriculture does exist. The evolving landfill simply moves the side canyon walls, where the air drainage begins, forward towards the canyon mouth.
4. As discussed in Section 3.8.3.2.2 of the Draft EIR, filling the side canyon would not change the airflow in the main canyon by more than a 0.5 percent ratio in air volumes calculated in the Draft EIR. This 0.5 percent maximum possible effect on airflow is judged to be insignificant compared to the much larger variability in the meteorological and topographical variables that affect frost formation.
5. The analogy to a 20-story building in this comment is not meteorologically equivalent because the proposed project would not block air movement. Rather, the proposed project would move the position of the side canyon wall forward to the face of the waste prism. Air will still cool after sunset and will drain down the face, regardless of its position. Airflow from the new face of the proposed project would not be significantly different than the existing airflow from the side canyon and, therefore, no significant change would occur in the airflow at the location of orchards and other agricultural land in the main canyon.

6. As discussed in Section 3.8.3.2.2 of the Draft EIR and in this response, it has been shown that a land feature the size of the proposed project would not "inevitably" alter frost damage patterns where they matter, which is at the location of the orchards, not in the side canyon. In fact, as can be seen in Figures 3.8.1 and 3.8.4 of the Draft EIR, the orchards in Timber Canyon are a minimum of 2,000 feet west of the entrance to the side canyon containing Toland, a distance sufficient to dampen the small effect of the volume change in the side canyon on micrometeorology in the main canyon orchards.

Response 22-10

1. Section 3.14.5 of the Draft EIR included operational procedures and regulatory requirements that would minimize the potential effects of litter associated with the proposed project, including the effects of wind-borne waste and litter carried offsite. In accordance with CCR Title 14, the following measures shall be implemented at the landfill to control litter:
 - Waste shall be compacted at the working face of the landfill.
 - Periodic application of daily cover or alternative cover during the day and at the end of the working day.
 - During periods of high winds, more frequent application of cover material.
 - Maintain the working face at as small an area as safely practicable given the type of and number of landfill equipment operating at the working face.
 - 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.
2. In response to this and other comments, the following additional mitigation measures have been included in the EIR to better define the litter control program:
 - Litter control crews shall inspect the landfill fences (permanent and portable fences) on a weekly basis and remove litter.
 - During periods of high winds, litter control crews shall be dispatched at least twice a week, or more frequently if required, to inspect the landfill fences (permanent and portable fences) and remove litter.
 - 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.
3. As discussed in Section 3.14 of the Draft EIR, VRSD would take appropriate steps if there is a recurring situation regarding inadequate covering of waste loads by a particular hauler. In response to this and other comments, a mitigation measure has been included in the EIR to clarify these actions, that may include reporting the waste hauler to the LEA (which oversees inspection and tagging procedures for commercial vehicles) and/or the County Sheriff's

Department and California Highway Patrol (which enforce the California Vehicle Code). Violation of the California Vehicle Code is punishable by fines and/or jail. This additional mitigation measure and those stated above, would assure that the potential impacts of litter from the proposed project remain below a level of significance.

4. The inclusion of these additional mitigation measures in this Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project. Also see Table A.1 of Appendix A of this Final EIR for a combined listing of the operational procedures and regulatory requirements, and mitigation measures including those noted above for litter control.
5. The majority of the 1,500 tpd of waste that would be transported to Toland as part of the proposed project would be hauled by commercial waste disposal companies. These companies have not been a source of illegal dumping in the County. When illegal dumping occurs, it can normally be associated with private parties that either do not want to pay the tipping fee or who find a landfill closed when they arrive. As discussed in Section 3.14.3.1.3 of the Draft EIR, it is recognized that illegal dumping would remain a concern, although, it is expected to diminish under the proposed project. This conclusion was based on the additional days the landfill would be open per week and the greater daily capacity. The proposed schedule and daily capacity is expected to provide sufficient opportunity for private parties to utilize the landfill, therefore, reducing the potential for illegal dumping.
6. Based on VRSD records, there are very few incidents (i.e., three to four per year) of illegal dumping in the vicinity of Bailard (Haden, 1995). VRSD currently cleans up incidents of illegal dumping within the area of the landfill as part of a "good neighbor" policy. If the owner of the illegally dumped material can be identified, VRSD reports the person or persons to the County Environmental Health Division. In the event that hazardous waste is illegally dumped, VRSD implements one of the following procedures:
 - If the amount of material is small and mainly consists of household hazardous waste, VRSD picks up the material and sets it aside for collection by a licensed hauler for transport to an appropriately permitted facility.
 - Material other than small amounts of household hazardous waste reported in the vicinity of the site is reported to the County Environmental Health Division.

These procedures would continue under the proposed project. It is unclear as to what is referred to in the comment by "the current rate of vandalism, related to illegal dumping around Bailard Landfill."

7. The "specific onsite and offsite efforts by VRSD" to reduce illegal dumping were included in Section 3.14.5 of the Draft EIR and include the following:
 - 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.
 - At the time of landfill closure, signs would be posted at the landfill entrance and scalehouse indicating the date of closure and alternative permitted landfills available to accept waste. 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.

Response 22-11

1. Based on NPDES permit requirements under the Federal Clean Water Act and administered by the RWQCB, if stormwater has the potential to come in contact with activities such as equipment maintenance areas, measures must be included to assure that it has not become degraded prior to discharge. Since landfill equipment would be serviced, maintained and cleaned at the operations and maintenance center, there is a potential that stormwater runoff from portions of the operations and maintenance center could become degraded with oil and grease. While the final design of the landfill has not been completed, to be conservative, Section 2.5.3.1 of the Draft EIR indicated that if stormwater may potentially be degraded at the operations and maintenance center that it would be collected in a sump. If stormwater from the operations and maintenance center is determined to be degraded, it would be transported on an as-needed basis to offsite wastewater treatment facility.

Response 22-12

1. In accordance with CCR Titles 14 and 23, the proposed project would only be allowed to accept sewage sludge that has been dried to a maximum moisture content of 50 percent. Based on VRSD's records for the period from January through November 1995, an approximate average of 0.1 tons per day of sewage sludge was landfilled at Toland (i.e., an average of approximately 200 pounds per day). During this same period, an approximate average of 6.1 tons per day of sewage sludge was landfilled at Bailard. It is reasonable to assume that, with the closure of Bailard and the approval of the proposed project, a combined

average range of 6 to 7 tons per day of sewage sludge could be landfilled at Toland under the proposed project. There is no reason to expect this tonnage to increase dramatically and, in fact, over the next several years the tonnage of sewage sludge requiring landfilling may decrease based on various composting and direct land application programs for sewage sludge that are being considered by others.

2. Notwithstanding the above, state regulations (i.e., CCR Titles 14 and 23) consider sewage sludge to represent just one component of municipal solid waste that can be disposed at Class III landfills. Therefore, while the permits for the proposed project would limit the moisture content of sewage sludge that can be landfilled (i.e., a maximum moisture content of 50 percent), it is not expected that the permits for the proposed project would limit the tonnage of sewage sludge that can be landfilled on a daily basis, as long as the proposed 1,500 tpd of waste is not exceeded.

Response 22-13

1. Landfill gas flare systems are routinely required and installed at most major landfills. In accordance with APCD Rule 74.17, a landfill gas collection and destruction system must be installed when the cumulative decomposable portion of waste at the landfill reaches 500,000 tons. The flare would be operated 24 hours per day, 7 days a week, however, the flares consist of an internal combustion chamber and there is no visible flame or glow from the flare so it would not be visible at night. As the flame is not exposed, the flare would not represent a potential ignition source for onsite or offsite fires.
2. Flare systems included various monitoring capabilities, incorporating gas flow rate, oxygen content, low temperature indicator, and "flame out" indicator. Monitoring can occur at the site or it can be accomplished from an offsite location if the data is transmitted by modem.

Response 22-14

1. The potential impacts from fires originating on the landfill was discussed in Section 3.15.3.1.1 of the Draft EIR. The potential of fires being caused by landfill operations or personnel is considered remote, as the landfill is barren, uncovered waste during operations is kept small, and there is no exposed waste at the end of the day that could catch fire. In addition, the Draft EIR described the operational procedures and regulatory

requirements that would reduce or eliminate the potential impacts. These were described in Section 3.15.5 of the Draft EIR and include:

- Daily cover and fill operations.
- 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 the 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 to assure "hot loads" are not transported to the working face.
- Maintenance of small working face.

As stated in Section 3.15.7 of the Draft EIR, mitigation measures would not be required, although adherence to procedures, regulations and permit conditions shall be necessary throughout operation and closure/postclosure of Toland to assure potential impacts associated with fires are not significant.

Response 22-15

1. As discussed in Section 3.10.3.3 of the Draft EIR, the noise study conducted for the proposed project did consider the relatively steep grade of Toland Road. Noise measurements of waste trucks were taken along a steep portion of Toland Road (approximately 8 percent grade) to determine the potential impact of truck noise on surrounding sensitive uses (MGA, 1995).

Response 22-16

1. Vehicle emissions estimates in Section 3.12 of the Draft EIR are based on the most recent version (EMFAC7F1.1) of CARB's emission factor computer model, which takes into account standardized test cycles and nonstandard conditions. Inputs used in the model include type of vehicle, fuel, speed, control technology (e.g., catalytic), ambient temperature, and year (up to 2020 is available). These emission factors, the most detailed available, were selected for purposes of the Draft EIR for heavy-duty diesel trucks traveling at 25 mph on Toland Road.
2. CARB confirms that specific emission factors have not been developed to simulate trucks ascending and descending grades (CARB, 1995), therefore, increased emissions associated with trucks ascending Toland Road are considered to be included in the standard emission factors from CARB. The potential significance of these emissions and resulting ambient

concentrations is interpreted by reference to state and federal ambient air quality standards. These standards were developed to protect human health with an adequate margin of safety, and are concentrations averaged over time periods that vary from one hour to one year. These averaging times remove much of the detailed variability that exists in emission sources, especially in mobile sources with engine loading that varies continuously based on factors such as accelerator position and road grade.

3. Further context for the appropriateness of using standard emission factors comes from the observation that vehicular air emissions in the vicinity of Toland are influenced far more by nonproject-related traffic volumes on Highway 126 than from project-related traffic volumes. As noted in Section 3.11.4 of the Draft EIR, 1.2 to 2.3 percent (i.e., the "proposed case" and "worse case," respectively, as defined by the Draft EIR) of the 37,600 vehicles per day that are estimated to use Highway 126 in 2015 (furthest projection available from Caltrans) would be associated with the proposed project. The other 36,735 to 37,150 vehicles will emit 97 to 98 percent of the total mobile source emissions associated with traffic on Highway 126.
4. The traffic study for the proposed project estimated that under existing conditions, the average wait to make a left turn from State Route 126 (eastbound) onto Toland Road is approximately 6 seconds during the peak morning hour. The average existing delay during the peak afternoon hour could not be calculated since no vehicles made this turning movement within that peak period during the traffic survey. A 6-second delay corresponds to a high level of service (LOS B) for the turning movement. Under future conditions in 2015 with the proposed project, the average wait to make this left turn is projected to range between 13 and 19 seconds for peak hour traffic. Delays between 10 and 20 seconds correspond to an acceptable level of service (LOS C).
5. Environmental impact analysis for landfills benefits from comparison with similar landfill projects and their analyses. The traffic and other analyses for the El Sobrante and Bailard landfill EIRs have both been used in the Toland Draft EIR as a means of assuring that impacts are appropriately analyzed based on operations at other landfills currently accepting approximately 1,500 tons of waste per day.

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PERSONALLY DELIVERED, NOVEMBER 6, 1995
RECEIVED
NOV 06 1995

Ventura Regional Sanitation District
Attention: Acting General Manager
1001 Partridge Drive, Suite 110
Ventura, California 93003-5562

Re: Written Comments to Draft Environmental Impact Report
Toland Road Landfill Expansion Project
OUR FILE NO.: 11795

Dear Ladies and Gentlemen:

This letter constitutes written comment to the above-referenced DEIR submitted on behalf of over 60 individual and corporate clients of this firm that own or operate property in the vicinity of the Toland Road Landfill. In addition to submitting this letter, such persons and companies incorporate and adopt by this reference the written comments submitted by the Cities of Santa Paula and Fillmore, including, but not limited to, the comments prepared by Impact Sciences, Inc. Also, in addition to this letter, a number of such persons and companies have submitted individual comments.¹

This firm's clients respectfully submit that the DEIR is inadequate, and that further study and revision are required. Among the deficiencies of the DEIR are these areas:

1. **Lead agency designation:** An overriding CEQA concern is that VRSD is not the proper lead agency for the preparation of the EIR. As the County of Ventura will be the primary permitting agency, the entire environmental review process should be conducted by the County of Ventura's Resource Management Agency, and the EIR should be subject to review by its Environmental Report Review Committee (ERRC), and certification by the Board of Supervisors.

1. These include, but are not limited to, written comments submitted by F. Michael Shore on behalf of Timber Canyon Ranches and Gordon E. Kimball on behalf of Kimball Ranches - El Hogar. In case such written comments are not received by you by 5:00 p.m. on November 5, additional copies are submitted herewith.

Ventura Regional Sanitation District
November 3, 1995
Page 2

2. **Cumulative effects:** CEQA requires that the cumulative environmental effects of the project be analyzed. The DEIR breaks environmental concerns into various areas of discussion (e.g., air quality, traffic, biologic resources, etc.), but fails to sufficiently analyze the overall cumulative environmental impact of the project as a whole.

3. **Traffic and air quality:** The DEIR fails to adequately address the environmental effects of the "stacking" that will inevitably occur in the eastbound left turn lane of Highway 126 at the intersection of Toland Road, and the acceleration and deceleration of trucks ascending Toland Road to the landfill, and returning, including traffic, air quality, and noise. Furthermore, the traffic, air quality and noise analyses are too narrow geographically, focusing primarily on the Highway 126/Toland Road intersection, and ignoring other impacted intersections, including Highway 126/Hallock Drive in Santa Paula, and the controlled intersections on Highway 126 in the City of Fillmore. The DEIR's observations that the project's contributions to traffic volumes on Highway 126 will be incremental may be correct, but the DEIR fails to take into account that the project's incremental contribution will consist of the ONLY growth component consisting exclusively of heavy trucks turning off of, and on to, Highway 126 at Toland Road.

4. **Cultural and aesthetic impact:** CEQA Guidelines now require that the cultural and aesthetic impacts of a project be analyzed. The DEIR fails to consider the cumulative effects of the project on the cultural and aesthetic components that have served to make Highway 126 between Castaic and Santa Paula a travel corridor for tourists. The emerging tourist industry is extremely important to the cities of Santa Paula and Fillmore. At the very least, study of the issue should include individual and focus group interviews by qualified marketing consultants, including psychologists, to determine whether or not the expansion of the landfill will result in damage to the corridor's "image," and the possible loss of tourist interest.

5. **Dust:** The analysis of the effects of dust generated by the project on local agricultural operations is solely dependent upon anecdotal reference to another landfill in another geographic area, the Highgrove Landfill in Riverside County (see Section 3.14.3.1.1), a facility that this firm's clients understand is very different from the project. No attempt is made to specifically analyze the amount of dust that may be generated by this project, and its effect upon the specific agricultural operations in the immediate vicinity.

6. **Need for additional sites in the future:** The landfill is presently the primary site for nonhazardous municipal refuse

disposal by the Cities of Santa Paula and Fillmore. The project will shorten the landfill's effective useable life by at least 20 years and possibly more. In other words, these two cities will be faced with having to find new landfill sites two decades earlier than under present conditions. The DEIR fails to analyze the environmental effect that this "foreshortening" will have on both of these communities.

As you know, this firm's clients remain overwhelmingly opposed to the expansion of the Toland Road Landfill. No matter how such expansion is mitigated, there is no question but that it will result in a decrease in the overall environmental and aesthetic quality of the immediate area. At the same time, they understand that the purpose of CEQA is not to preserve the local environment as though it were "frozen in time," but, rather, to insure adequate disclosure and discussion, so that a final determination may be made with full knowledge of the environmental impact of the project. As presently constituted, the DEIR does not adequately disclose or discuss the serious environmental impacts of the project.

Thank you very much.

Very truly yours,

MUEGENBURG, NORMAN & DOWLER
A Professional Law Corporation



By ROBERT M. SAWYER

RMS:11795-1.cmh
cc: Toland Road Area Property Owners
Ventura County Taxpayers Association,
Attn: Michael L. Saliba
City of Santa Paula, Attn: Arnold Dowdy
City of Fillmore, Attn: Roger Campbell
Katherine E. Stone

19 October 1995
GEK

TOLAND LANDFILL DRAFT EIR PUBLIC COMMENTS

QUESTIONS NOT ANSWERED

1. Why does the rainwater runoff from the area around the operations and maintenance require collection for special treatment?
2. Gas flaring
 1. Will the gas flaring be 24hrs/day, 7 days/week?
 2. How many years after closure will flaring be required?
 3. What will be the fire risks from the flare in a severe east wind?
3. Why will there only be a leachate control and recovery system, not be a full liner, in the area of the existing landfill, as would be required if it was a completely new landfill?
4. How will you eliminate the possibility of starting a brush fire?
5. What is the traffic count at Bailard currently? Why is it not referenced in the vehicle calculations.

ERRORS AND OMISSIONS

1. Storm water retention basin
 1. Required size and design?
 2. What will be the maximum release rate?
 3. What will be the method of release?
 4. How will the release be controlled?
2. Dust
 1. No discussion of how mud and dirt carried onto Toland Road by vehicle tires, fenders and mudguards will be eliminated before it dries and turns into dust deposited on adjoining orchards.
 2. The use of the Piru APCD dust data is invalid as it is in a completely different area - much dustier due to the relatively larger exposed surface are of the river.

3. No mention of Bailard landfill dust situation. Experiences at landfills hundreds of miles away, operated by other agencies are irrelevant. What about the landfill operated by VRSD.
 4. Why is there no mention of the Bailard Landfill when evaluating the effects of landfill generated dust on neighboring agriculture and the additional pest control required?
 5. Why were the Bailard neighbors not surveyed?
3. Litter
1. How will windborn trash such as plastic grocery bags, be controlled?
 2. How can you possibly believe that illegal dumping will decrease with a tenfold increase in activity?
 3. What is the current rate of illegal dumping activity around Bailard?
 4. What is the frequency of vandalism related to illegal dumping around Bailard?
 5. Who will be responsible for hazardous waste illegally dumped on adjoining farmlands as it has been at Bailard?
 6. Why were the neighbors of Bailard not surveyed about the litter problem?

7

4. Water
 1. Water removal from local aquifers will affect water availability in the area. Fillmore basin is not one large pool of water.
 2. There is no discussion of water availability in a drought/water basin overdrift/pumping restriction situation. What priority will you have given you are only recent users and expropriators?
 3. "Since the Rio Plaza Water Company would not exceed its water allotment, the proposed project would not result in additional water withdrawal from the Oxnard Plain." How can you draw 30 ac.ft of water, water, not unused water allocation, from wells located in the Oxnard plain without increasing the water drawn from the Oxnard Plain? Are you proposing to use 30 acft which is currently used for another purpose?
5. Noise
 1. No consideration has been given to the additional noise generated by trucks due to the grade on Toland Road. Trucks going up or down a hill make considerably more noise than on a flat road.
 2. No consideration has been given to the additional noise generated by trucks stopping and turning at the Toland-126 intersection.

AND EMISSIONS

8

- Safety
1. You have concluded that a turning lane of forty feet is more than adequate. How long is a transfer truck? How many transfer trucks will fit in forty feet?
 2. The Toland road grade is acknowledged to be dangerous. It has already claimed one life. What would be the consequences of a truck or pickup brake

- problem resulting in an out of control vehicle crossing 126?
3. Will no danger mitigation take place unless there is an accident?

Frost Effects

1. You will have an effect. Frosts are often marginal and any change in wind or drift patterns will result in stagnant air pockets or skips in ground level air movement. Your analysis is conducted on a gross volume/acre basis. Freezes often occur on one to five acre basis as evidenced by the varied effects of wind machines.

1975

Timber Canyon Ranches
19659 E. Telegraph Rd.
Santa Paula, Ca. 93060

Mr. Robert Sawyer
Luettgen's, Hornum and Douler
140 County Square Drive
Ventura, Ca. 93003

(for your Toland Dump file)

Oct. 30, 1995

Regarding the Expansion of Toland Dump:

Dear Sir,

I live at 19659 E. Telegraph Rd., Santa Paula with my family on our citrus and avocado ranch. This is very near Toland Dump. We have lived and farmed here for thirty years. Our neighborhood between Santa Paula and Fillmore is one of the most beautiful areas for living and one of the best areas for raising citrus and avocados in Ventura County.

When Toland Dump was first developed, I attended all of the public hearings. At that time all of the property owners felt that the dump would not be compatible with this area. We were assured by the county that Toland Dump was to be a regional dump serving only the Santa Clara Valley area. There was no mention of the dump being expanded to serve the entire county. If county government now decides to allow the expansion of Toland Dump, those original assurances will be obliterated, thrown aside. If county government can one day make an important land use decision and then cast it aside the next day, my belief in the local government process will be greatly undermined. What is to prevent the placement of subdivisions, strip malls, golf courses and factory outlets amidst our green belts.

I have read the draft environmental impact statement, and it does not deal with the environment. The environment around Toland Dump is my neighborhood of citrus and avocado groves, range land and vegetable farms. Should the Toland Dump expansion be allowed, there will be a tremendous impact on this area. Traffic, noise and dust will increase. The nuisance factor of having a dump in my neighborhood will be exacerbated. Land values will be degraded.

Toland Dump should not be expanded to serve all of western Ventura County. It should continue to function as a regional dump as it was originally intended. If there is truly a need for a dump to serve western Ventura County, it should be in Western Ventura County at a site such as Weldon Canyon.

Sincerely,
F. Michael Shore

F. Michael Shore

copies to Kamis Hildee, Robert Chirelli, Robert Stone, Donald Koepf

DOCUMENT 23
MUEGENBURG, NORMAN & DOWLER
RESPONSE TO COMMENTS

Response 23-1

1. CEQA Guidelines lists criteria for identifying the lead agency when two or more public agencies will be involved with a project:
 - "If the project will be carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency." (Section 15051 (a))
 - "Where more than one public agency equally meet the criteria in subsection (b), the agency which will act first on the project in question shall be the Lead Agency." (Section 15051 (c))

2. Based on the criteria listed in the CEQA Guidelines, VRSD is the appropriate lead agency for the proposed project. Other agencies (referred to in the CEQA Guidelines as responsible agencies) will use the EIR in the process for issuance of the various permits required for the proposed project. The pertinent requirements of these agencies have been considered in the environmental analyses.

Response 23-2

1. In accordance with CEQA Guidelines Section 15130, the Draft EIR contains "a reasonable analysis of the cumulative impacts of relevant projects" and "reasonable options for mitigating or avoiding any significant cumulative effects" of the proposed project. The concept of the "...overall cumulative environmental impact of the project as a whole..." was discussed in the land use compatibility section of the Draft EIR (see Section 3.8.3.2 of the Draft EIR).

Response 23-3

1. As discussed in the Section 3.11.3.1.2 of the Draft EIR, excessive vehicle stacking for the eastbound left turn movement from Highway 126 to Toland Road is not anticipated since the left-turn pocket provides adequate storage length. Based on peak hour estimates for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The Caltrans design standard, based on the number of turning vehicles likely to arrive in an average two minute period during peak hour, for vehicle storage in the left-turn

pocket would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car). The existing 120-foot, left-turn pocket for eastbound traffic exceeds this requirement.

2. Under the "proposed case" and the use of transfer trucks, during the peak hour a waste truck would arrive at the intersection an average of once every 10 minutes. Based on the longer truck length for transfer vehicles, the required left-turn storage length for the "proposed case" would be 85 feet (60 feet per transfer truck and 25 feet for the passenger car). Based on the Caltrans design standard, therefore, depending on whether packer trucks or transfer trucks are used, the required left-turn pocket length at the intersection of Toland Road and Highway 126 would range between 65 feet and 85 feet. The existing 120-foot left-turn pocket and configuration at this intersection and approach lanes, as shown in Figure 3.11.3 of the Draft EIR, provides waste trucks and other vehicles adequate distance to safely approach the intersection.
3. This comment also expressed a concern regarding the environmental effects of truck acceleration and deceleration on Toland Road. Vehicle emissions estimates in Section 3.12 of the Draft EIR are based on the most recent version (EMFAC7F1.1) of CARB's emission factor computer model, which takes into account standardized test cycles and non-standard conditions. Inputs used in the model include type of vehicle, fuel, speed, control technology (e.g., catalytic), ambient temperature, and year (up to 2020 is available). These emission factors, the most detailed available, were selected for purposes of the Draft EIR for heavy-duty diesel trucks traveling at 25 mph on Toland Road.
4. CARB confirms that specific emission factors have not been developed to simulate trucks ascending grades (CARB, 1995), therefore, increased emissions associated with trucks ascending Toland Road are considered to be included in the standard emission factors from CARB. The potential significance of these emissions and resulting ambient concentrations is interpreted by reference to state and federal ambient air quality standards. These standards were developed to protect human health with an adequate margin of safety, and are concentrations averaged over time periods that vary from one hour to one year. These averaging times remove much of the detailed variability that exists in emission sources, especially in mobile sources with engine loading that varies continuously based on factors such as accelerator position and road grade.
5. The effect of the grade of Toland Road is also considered in the noise analysis for the proposed project. Noise measurements of waste trucks were taken along a steep portion of Toland Road

(approximately 8 percent grade) to determine the potential impact of truck noise on surrounding sensitive uses (MGA, 1995). The noise level data was incorporated into Section 3.10.3.3 of the Draft EIR.

6. With respect to the comment that Draft EIR's analysis of air quality, noise and traffic impacts was too narrow geographically, it should be noted that the project would not generate additional waste truck traffic east of Toland Road. Noise and traffic levels proximate to Fillmore would, therefore, not increase due to the proposed project. The number of vehicles transporting waste from the Santa Clara Valley (Santa Paula, Fillmore, the community of Piru and other unincorporated areas) is expected to continue to be at a maximum of approximately 70 per day.
7. It is recognized that project traffic would affect Highway 126 and intersections with this arterial west of Toland Road. However, even under the "worse-case" (i.e., packer trucks) traffic scenario, project-related traffic would represent approximately 2.3 percent of the future ADTs on Highway 126 (see Section 3.11.4.1 of the Draft EIR). The proposed project's contribution to the traffic-related cumulative noise impact would be a maximum increase of 0.6 dBA under the "worse case" traffic scenario for 2015, and the additional traffic would not substantially affect intersections other than Toland Road and Highway 126. Nonproject-related traffic, air quality and noise conditions along Highway 126 represent a regional issue and are not the responsibility of VRSD. Mitigation measures for the nonproject-related cumulative impacts were, therefore, not proposed as part of the proposed project.
8. The environmental analysis for each topical area of the Draft EIR, including traffic, noise and air quality, incorporated the specific characteristics of the proposed project. Information as available, was used to define and assess the particular impacts associated with the heavy trucks which would transport waste to Toland. Relevant factors for the project site and region, including geographical and topographical characteristics, were also considered and quantified when possible.

Response 23-4

1. Cultural resources, as defined by CEQA and described in Section 3.6 of the Draft EIR, include prehistoric or historic places or objects that are important for scientific, historic, and/or religious reasons to cultures, communities, groups, or individuals. The impacts of the proposed project on cultural resources was analyzed in Section 3.6 of the Draft EIR. No significant impacts to cultural resources are expected from the proposed project.

2. Section 3.9 of the Draft EIR addressed the impacts to the aesthetic character and visual resources within the proposed project site and surrounding area, and discussed the potential aesthetic effects associated with the proposed project. The determination that there would be no significant impacts from the proposed project with regard to visual characteristics was based on the minimal amount of newly disturbed acreage associated with the proposed project, in addition to the project being a continuation of current landfilling activities. The increase in the height of the landfill was also considered. As demonstrated in Figures 3.9.3 through 3.9.5 of the Draft EIR, the proposed project would not extensively alter the natural appearance of the area. Therefore, impacts are not considered significant.
3. The purpose of an EIR is to disclose the environmental impacts of a proposed project. It is not feasible to analyze the potential impacts to a highway's "image" or the psychological "damage" to the potential tourist industry. The elements of the proposed tourist industry are vague, and to properly evaluate the potential cumulative impacts of the tourist industry and the proposed project, it would be necessary to have a project description. Since at this time there is no formal description of the potential tourist industry, it is not possible to assess the potential cumulative impacts.
4. It is recognized that the comment's concerns regarding impacts to the potential tourist industry relates to the quality of life in the Santa Clara Valley. Quality of life is subjective, based on a combination of many separate factors (e.g., visual character, surrounding land use, noise, traffic, etc.). These factors have been addressed individually in Sections 3.2 through 3.15 of the Draft EIR and will be taken into consideration by the lead and responsible agencies when making decisions on the proposed project.

Response 23-5

1. A complete discussion of fugitive dust as it relates to agricultural operation was presented in Section 3.8.3.2.2 (Agricultural Use) as a part of Section 3.8 on Land Use within the Draft EIR. As part of the Draft EIR, the emissions of PM₁₀ by the proposed project were modeled to determine the resulting concentration, which is compared with the background concentration. This comparison shows that the proposed project would not contribute more than a 2 percent increase in PM₁₀ concentration or in the resulting deposition.
2. Based on this and other comments, a mitigation measure has been included in the EIR that shall require VRSD to pave, or pay the cost to pave, unpaved roads in the vicinity of Toland to

mitigate the PM₁₀ generated by the proposed project. The linear feet of unpaved roads to be paved shall be developed in consultation with the APCD and shall be sufficient to offset the PM₁₀ from project sources (i.e., offsite mobile emissions and onsite emissions). Based on a preliminary analysis, paving approximately 27,500 linear feet (i.e., approximately 5.2 miles) of unpaved roads in the vicinity of Toland would offset the PM₁₀ generated by the "worse case" traffic scenario (i.e., 450 vehicles per day versus the "proposed case" of 210 vehicles per day). The actual linear feet of unpaved road to be paved to offset the PM₁₀ generated by the proposed project would be based on the number of vehicles traveling to the site on a daily basis. With the inclusion of this mitigation measure, the proposed project would not result in an increase in the concentration of PM₁₀ in the agricultural areas immediately adjacent to the landfill or along Toland Road. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 23-6

1. As discussed in Section 4.8 of the Draft EIR, tipping fees at Bailard are presently subsidizing Toland operations. Required improvements at Toland to meet state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) that would be required with or without the proposed project could not be amortized based on landfill revenues at the currently permitted 135 tpd disposal rate without the subsidy provided by Bailard. Therefore, for purposes of the EIR it is assumed that Toland would also close in the summer of 1996. Based on the assumption that Toland would close in the summer of 1996, the proposed project does not result in a "...foreshortening..." of waste disposal capacity at Toland. In fact, the proposed project would provide waste disposal capacity for Santa Paula and Fillmore and the unincorporated areas of the Santa Clara Valley at Toland for 30 years.
2. The impacts associated with diversion of waste to a new or existing solid waste facility at the time of closure of Toland under the proposed project (in approximately 30 years) would be addressed at that time as part of the specific project being considered to replace Toland. To attempt to address these impacts at this time would be speculative as the alternatives for management of solid waste 30 years in the future are not known. Section 15145 of the CEQA Guidelines indicates that EIRs are not required to address issues that are speculative, therefore, the potential impacts associated with diversion of waste to a new or existing solid waste facility at the time of closure of Toland are not addressed in this EIR.

The comments in the attachment letter from Kimball Ranches - El Hogar were addressed in the responses to Document 22, except for the following:

Response 23-7

1. A survey of residences in the vicinity of Bailard was not completed, because it was not pertinent to the discussion of potential litter impacts associated with the proposed project. As discussed in Section 3.14 of the Draft EIR, with implementation of operational procedures, regulatory requirements, and mitigation measures no significant litter impacts are expected from the proposed project.

Response 23-8

1. This comment expressed a concern that waste trucks idling at the Toland Road/ Highway 126 intersection could result in high noise levels. As discussed in Section 3.10.2.3 of the Draft EIR, during the noise measurements taken for the project study, trucks making left or right turns on Toland Road were normally not audible over the traffic noise on Highway 126 (MGA, 1995). The highest noise levels were associated with nonproject-related trucks passing by in the nearest lane at high speeds. Under existing conditions, plus the proposed project, an average delay of approximately 7 seconds for left turn movements from Highway 126 onto Toland Road is estimated (WPA, 1995). This does not represent a significant increase over the approximately 6 second delay currently experienced by waste trucks at this intersection.

Response 23-9

1. The commenter's opposition to the proposed project is noted. The potential environmental impacts from noise, dust, and traffic, and the potential land use conflicts associated with Toland were evaluated in detail in the Draft EIR (see Sections 3.10, 3.12, 3.11 and 3.8, respectively). As summarized in Section 1.3.2 of the Draft EIR and as discussed in detail in the topical sections of Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.



Ventura Regional Sanitation District
 1001 Partridge Drive, Suite 150
 Ventura, Ca 93003-5562

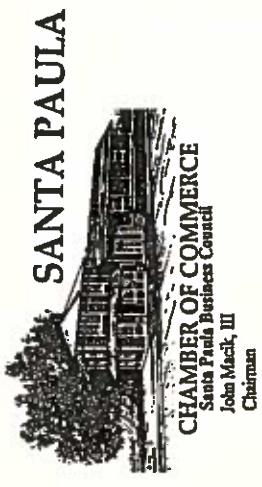
General Manager:

As the Chairman of The Santa Paula Business Council and the Vice President of Santa Paula Chevrolet, I would like to make some comments on the DEIR and also ask some obvious questions. I trust that both will be answered in the final EIR, but hope that they will help you make a decision to stop going forward with the proposed project.

As to the comments on the DEIR, I can only say, that if you are going to spend \$790,000.00 of the taxpayers money it better say exactly what you want it to say! This report exemplifies the fact that "you get what you pay for!"

My questions and the questions of others that are not addressed in the DEIR are:

- 1) What is the potential impact of the migration of birds (specifically seagulls) to this landfill and it's close proximity to the Santa Paula Airport?
- 2) What will happen when the amount of trash going onto the dump is not enough to keep it economically sound because of the projected increase in recycling efforts? Will rates be increased to cover both operating costs and retire the debt incurred by the expansion? Will we then be held prisoner to this dump when a more cost effective or economically viable solution becomes available in the near future?
- 3) How can you estimate or project the impact of traffic on the already strained and dangerous Highway 126? A left turn lane with 200 to 450 additional large trucks per day crossing oncoming traffic and backing up in the east bound lane waiting to turn left is a condition that can not be mitigated. The loss of just one additional life as a result of a trash truck accident on Highway 126 can not be mitigated.
- 4) The air quality as a result of the trucks belching many times the normal exhaust fumes and pollutants while idling at the intersection of Toland and Highway 126 has not been addresses. How will that affect air quality? The increased exhaust fumes and pollutants as a result of the gearing down to climb the Toland road grade. How can that be mitigated?



5) The negative impact on the peoples lives around Toland Road caused by increased noise, traffic, dust, water contamination, birds, air pollution, pest control, farming, visual impact, odor, decrease in property value, health risk and just the mental anguish of having to even think that one of these things or some other that I haven't listed is affecting the quality of life. Isn't that called a "nuisance"? Yet, the potential impact of "nuisance" in the DEIR is, ... "not significant".

Respectfully,

[Handwritten Signature]
 John Macik, III
 Chairman
 Santa Paula Business Council

DOCUMENT 24
SANTA PAULA CHAMBER OF COMMERCE - JOHN MACIK
RESPONSE TO COMMENTS

Response 24-1

1. Toland does not currently attract birds and is not used as a loafing area by gulls. It is speculative as to whether gulls or other bird species would be attracted to Toland due to the proposed project. Similarly, it is speculative as to whether gulls would come in conflict with the Santa Paula Airport. Issues that are speculative cannot be evaluated, therefore, the possibility that Toland may attract gulls or other bird species and the potential that gulls could come in conflict with the Santa Paula Airport is not addressed in the EIR. Toland would be operated in compliance with CCR Title 14, including the following operational procedures (see Section 3.14.5 of the Draft EIR) that are known to be effective in minimizing birds at landfills:
 - Compaction of waste at the active working face.
 - Periodic 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.
 - The working face would be kept as small as safely practicable, given the type of and number of landfill equipment working there.
 - An active litter control program.

2. As discussed in Section 3.14.3.1.1 of the Draft EIR, in the event birds are determined to be a nuisance at Toland, additional measures would be implemented and may include, but not be limited to, the use of an overhead nylon line grid system (bird wires), distress tapes, propane cannons, and/or habitat manipulation/modification. The effectiveness of these measures would be monitored and, if found not to be effective, additional measures would be developed. To formalize this requirement, a mitigation measure has been included in this Final EIR regarding the use of additional measures in the event birds are determined to be a nuisance at Toland. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

3. As part of the permitting process, VRSD will coordinate with the FAA regarding the Santa Paula Airport.

Response 24-2

1. The staff of VRSD has provided the VRSD Board of Directors with detailed information regarding the economics of the proposed project, including the minimum disposal rate necessary to make the proposed project economically viable. The Board of Directors will consider this economic information along with the EIR as it makes its decision regarding the proposed project.

Response 24-3

1. The assessment of highway safety and design for the proposed project was prepared by a licensed traffic engineer (WPA, 1995) in accordance with the County's "Guidelines for Preparation of Environmental Assessment for Public Highway Safety and Design" (County, 1992). The study also employed the methodologies recommended by Caltrans for intersection capacity analysis, signal warrants, and highway design. Caltrans' methodologies have been developed to optimize traffic flow and assure traffic safety, and are considered the appropriate tools to predict project-related traffic impacts.
2. This comment expresses particular concern regarding the additional traffic which would make the eastbound left turn onto Toland Road from Highway 126. This movement, currently operating at LOS "B," would continue to operate at an acceptable service level (LOS "C") under cumulative conditions with 450 waste trucks per day. In addition, as discussed in the Draft EIR, excessive vehicle stacking for this movement is not anticipated since the left-turn pocket at the intersection of Highway 126 and Toland Road provides adequate storage length. Based on peak hour estimates for the "worse case" traffic scenario, on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The Caltrans design standard, based on the number of turning vehicles likely to arrive in an average two minute period during peak hour, for vehicle storage for these vehicles would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car). The existing 120-foot, left-turn pocket for eastbound traffic exceeds this requirement.
3. Section 3.11.3.1.3 of the Draft EIR provides the data to support the conclusion that the accident risk along Highway 126 is not anticipated to appreciably increase due to the proposed project. In addition, the improvements at the intersection of Highway 126 and Toland Road, as recommended by Caltrans, would further reduce the accident potential along Highway 126 (see Comment Letter 02). These improvements, including intersection control flashing beacons and warning signs, are included as mitigation measures in this Final EIR (see Table 1.1 of this Final EIR).

Response 24-4

1. Vehicle emissions estimates in Section 3.12 of the Draft EIR are based on the most recent version (EMFAC7F1.1) of CARB's emission factor computer model, which take into account standardized test cycles and non-standard conditions. Inputs used in the model include type of vehicle, fuel, speed, control technology (e.g., catalytic), ambient temperature, and year (up to 2020 is available). These emission factors, the most detailed available, were selected for purposes of the Draft EIR for heavy-duty diesel trucks traveling at 25 mph up and down Toland Road.
2. CARB confirms that specific emission factors have not been developed to simulate trucks ascending and descending grades (CARB, 1995), therefore, increased emissions associated with trucks ascending Toland Road are considered to be included in the standard emission factors from CARB. The potential significance of these emissions and resulting ambient concentrations is interpreted by reference to state and federal ambient air quality standards. These standards were developed to protect human health with an adequate margin of safety, and are concentrations averaged over time periods that vary from one hour to one year. These averaging times remove much of the detailed variability that exists in emission sources, especially in mobile sources with engine loading that varies continuously based on factors such as accelerator position and road grade.
3. Further context for the appropriateness of using standard emission factors comes from the observation that the vehicular air emissions in the vicinity of Toland are influenced far more by nonproject-related traffic volumes on Highway 126 than from project-related traffic volumes. As noted in Section 3.11.4 of the Draft EIR, 1.2 percent to 2.3 percent (i.e., the "proposed case and "worse case," respectively, as defined by the Draft EIR) of the 37,600 vehicles per day that are estimated to use Highway 126 in 2015 (furthest projection available from Caltrans) would be associated with the proposed project. The other 36,735 to 37,150 vehicles will emit 97 to 98 percent of the total mobile source emissions associated with traffic on Highway 126.
4. The traffic study for the proposed project estimated that the average wait to make a left turn from Highway 126 (eastbound) onto Toland Road is approximately 19 seconds during the peak morning hour and 14 seconds during the peak evening hour. These waiting times have been incorporated into the air quality analysis for the EIR.

5. VRSD will consult with APCD to determine the feasible mitigation measures available to reduce offsite mobile emissions associated with the proposed project to below a level of significance. The following measures were provided in Section 3.12.7 of the Draft EIR as examples of the measures that may be incorporated into the proposed project:
- Providing incentives to landfill employees to encourage ridesharing to reduce employee-related mobile source emissions.
 - Purchase of mobile emissions offsets, such as the continuation of VRSD's old vehicle scrap program.

Response 24-5

1. Quality of life is subjective based on a combination of many separate factors (e.g., noise, traffic, air quality, surrounding land use, visual character, etc.). These factors have been addressed individually in Section 3.2 through 3.15 of the Draft EIR.
2. Specific potential nuisance issues (i.e., vectors, birds, odors, litter, and illegal dumping) were addressed in Section 3.14 of the Draft EIR. The control of nuisances at landfills is set forth in: CCR Title 14, Division 7, Minimum Standards for Solid Waste Handling and Disposal; County APCD rules and regulations; County General Plan; California Vehicle Code, and by the County Environmental Health Division. As discussed in Section 3.14 of the Draft EIR, the conclusion that there would not be significant nuisance impacts from the proposed project was based on: (1) analysis of the potential nuisance impacts of the proposed project; and (2) implementation of the operational procedures and regulatory requirements, and mitigation measures included in the Draft EIR.



Santa Paula Chevrolet

101 W. HARVARD / P.O. BOX 70 / SANTA PAULA, CALIF. 93060 / Phone (805) 525-2127 • 647-2756

RECEIVED

OCT 26 1995

V. R. S. D.

Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, Ca 93003-5562

General Manager:

As the Chairman of The Santa Paula Business Council and the Vice President of Santa Paula Chevrolet, I would like to make some comments on the DEIR and also ask some obvious questions. I trust that both will be answered in the final EIR, but hope that they will help you make a decision to stop going forward with the proposed project.

As to the comments on the DEIR, I can only say, that if you are going to spend \$790,000.00 of the taxpayers money it better say exactly what you want it to say! This report exemplifies the fact that "you get what you pay for"!

My questions and the questions of others that are not addressed in the DEIR are:

- 1) What is the potential impact of the migration of birds (specifically seagulls) to this landfill and it's close proximity to the Santa Paula Airport?
- 2) What will happen when the amount of trash going onto the dump is not enough to keep it economically sound because of the projected increase in recycling efforts? Will rates be increased to cover both operating costs and retire the debt incurred by the expansion? Will we then be held prisoner to this dump when a more cost effective or economically viable solution becomes available in the near future?
- 3) How can you estimate or project the impact of traffic on the already strained and dangerous Highway 126? A left turn lane with 200 to 450 additional large trucks per day crossing oncoming traffic and backing up in the east bound lane waiting to turn left is a condition that can not be mitigated. The loss of just one additional life as a result of a trash truck accident on Highway 126 can not be mitigated.
- 4) The air quality as a result of the trucks belching many times the normal exhaust fumes and pollutants while idling at the intersection of Toland and Highway 126 has not been addressed. How will that affect air quality? The increased exhaust fumes and pollutants as a result of the gearing down to climb the Toland road grade. How can that be mitigated?
- 5) The negative impact on the peoples lives around Toland Road caused by increased noise, traffic, dust, water contamination, birds, air pollution, pest control, farming, visual impact, odor, decrease in property value, health risk and just the mental anguish of having to even think that one of these things or some other that I haven't listed is affecting the quality of life. Isn't that called a "nuisance"? Yet, the potential impact of "nuisance" in the DEIR is, ... "not significant".

Regretfully,


John Macik, III

Chairman

Santa Paula Business Council

DOCUMENT 25
SANTA PAULA CHEVROLET - JOHN MACIK
RESPONSE TO COMMENTS

Response 25-1

1. This letter includes the same comment as Comment Letter 24. Please see the response to Comment Letter 24 for specific response to these comments.

Simi Valley Landfill and Recycling Center
2801 Madera Road
Simi Valley, California 93065
805/522-7023



A Waste Management Company

26

Comments on the Toland Road
Draft Environmental Impact Report (DEIR)

By:

November 6, 1995

V. S. R. D.

5661 9 AON

R E C E I V E D

Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, California 93003

Subject: Comments on the Toland Road Draft Environmental Impact Report
(DEIR)

To Whom It May Concern:

2.4.43

Please find attached comments to the Toland Road Landfill Draft Environmental Impact Report (DEIR). Most of the comments are questions which are technical in nature requesting additional information or more detailed information on several items discussed throughout the DEIR.

Thank you for your opportunity to submit these comments.

Sincerely,

Danilo F. Vidal
Division Vice President and General Manager

:rjv/Toland

26

1. It seems inappropriate for VRSD as the owner and operator of the Toland Road Landfill to also be the lead agency for the EIR preparation. Please explain how this determination was made. ①

2. It also seems inappropriate for Environmental Solutions, Inc. (ESI) as the performer of all the engineering and environmental studies for the project to be the preparer of the EIR documents. Please explain how one group was approved to perform both tasks. ②

3. It should be stipulated in Table 1.1 that all Federal and/or State regulations will be followed including but not limited to 40CFR 258.12, 258.13, 258.14, 258.15 and 258.16. ③

4. Detailed fault, geotechnical, wetland, unstable area, seismic risk analysis and closure studies are not performed as required by Federal and State regulations. ④

5. The very preliminary geological study performed by ESI does not seem sufficient for this proposed major expansion. This work appears to be incomplete even for a geological literature review. ⑤

6. Complete geological, geotechnical and hydrogeological studies are usually required for this type of project during the EIR review. ⑥

7. The landfill slopes that support the proposed liner system are shown to be 1:2, 1:3 and 1.5:1 Horizontal to Vertical. How are these slopes analyzed with the required seismic forces? What are the dynamic properties of soil and rock for these slopes? ⑥

8. Are the excavated materials stockpiled at the site during construction of the landfill cells? ⑦

8a. If yes, show the additional engineering and costs associated with stockpiling and reusing of these soils. Also show the air quality impacts and the impact to the proposed tipping fees. ⑦

8b. If no, show how it is practical to construct the cells without stockpiling.

9. Since practically all the landfill closure activities will be performed during or after Phase IV operation as shown on the phasing plans, where is the final cover material (500,000 + cubic yard of material) coming from? Will it be generated on-site or will it be imported. (8)
10. If the steep 1:2, 1:3 and 1.5:1 slopes are not feasible due to stability problems associated with the extremely high ground motions as reported by ESI, will there be enough daily cover material (4,000,000 + cubic yards) available or would it be imported to the site. Are the impacts of importation on air quality, traffic and tipping fees analyzed. (9)
11. The access road will be constructed on the landfill cover as shown on the two alternatives proposed for the access road. If a failure of the landfill cover occurs due to the effects of seismic forces (peak ground acceleration of 1.g+), is failure of the access road considered? (10)
12. Are potential instabilities (due to the effects of seismic forces) such as landslides and the steep slope and mud flow analyzed for as required by Federal regulations? (11)
13. Are estimated operations personnel vehicle traffic as shown on Table 2.4 included in the Traffic and Air Quality studies? (12)
14. It appears that agricultural and vegetation waste would not be recycled as described in Section 2.3.5.3. If the recycling of these materials is implemented what is the impact to the life of the landfill and the tipping fees? (13)
15. If the landfill has to be closed prematurely, how would the landfill closure be accomplished at each phase of operation? (14)
16. Table 2.6 indicates 1 foot thick side slope protective soil over liner. How is this soil placed on the 1.2, 1.3 and 1.5:1 slopes and how does this soil maintain stability under static and seismic forces? (15)
17. Is the integrity of the side slope liner analyzed for seepage of the 1 foot thick protective cover? (16)
18. If additional soil thickness is required to make the sideslope protective cover stable, where would these materials be obtained from? If the material is to be imported, you would have to show the impacts for the Air Quality, Traffic and tipping fees. (17)
19. The DEIR does not clearly convey how the low permeability clay liner will meet the 1×10^{-7} cm/sec permeability requirements. (18)

20. Is there a specific study of on-site soils that estimates the clay liner (1×10^{-7} cm/sec permeability) quantities for this project. If the on-site clay materials are not available, would it be imported and show the impact. (19)
21. The proposed side slope liner does not meet State or Federal regulations. State and Federal regulations require a low permeability clay liner on the slope subgrade below the geosynthetic liner. The minimum 2 foot thick clay liner on 1:2, 1:3 and 1.5:1 slopes may not be stable and may require a greater thickness. For 2 feet or greater thick clay liner material a source should be identified in the EIR. (20)
22. Although for permitted landfills the new refuse can be placed over the existing refuse in the unlined area to final permitted grades, the vertical expansion will require a composite liner with a lower component of 2 foot thick clay with permeability of 1×10^{-7} cm/sec and an upper component of 40 mil FML. The proposed 1 foot thick low permeability intermediate soil barrier over the existing refuse does not meet Federal or State regulations. (21)
23. The stability of the composite liner and LCR's over the existing refuse is highly questionable even with the proposed design due to excessive refuse settlement and the extremely high design ground methods of 1.0 g. (22)
24. Federal regulations require that the stability and integrity of environmental controls, such as liners, leachate collection and removal systems, gas management system, stormwater management system be demonstrated in detail. Are these demonstrations performed? (23)
25. Detail hydrological and hydrogeological investigation are required for this project to evaluate the environmental impact. (24)
26. The site is located in a very active seismic zone, one of the most active in the country with ground accelerations exceeding 1.0 g. How are the seismic design analyses performed on this landfill when the dynamic properties of refuse are unknown to all the experts in the seismic design. The estimation of dynamic properties of refuse may be appropriate for areas with low ground motions, but for areas such as Toland Road landfill with an active fault near or at the site, it is recommended that a specific study be performed to obtain appropriate dynamic properties at high ground motion. (25)
27. How is the leachate collected and removed from the landfill. Please show detail design of the system specifically in areas over the existing refuse. (26)
28. Although horizontal and vertical gas collection are proposed for this landfill, additional landfill gas will be generated due to the additional refuse at this site. The landfill gas will migrate at the site from the unlined areas. Where are the studies for this landfill gas generation and migration. (27)

- 29. What is the impact of landfill gas migration on water quality? 28
- 30. How are the tipping fees calculated? A detailed cost analyses is required for an EIR since one of the issues is the low tipping fees. 29
- 31. The stability of 300 feet of refuse column and the stability of the final cover for this project is highly questionable. A detailed slope stability study of landfill cover slopes are required at this stage of permitting in accordance with Federal regulations. 30
- 32. A Closure and Postclosure Plan should be prepared in accordance with Federal regulations for this project and the cost of closure should be included in the tipping fee calculations. 31
- 33. Where is the source of low permeability soils for final cover? Are these materials stockpiled? What is the impact of stockpiling? 32
- 34. How is the vegetative cover maintained and what is the estimated water usage? 33
- 35. Historically it is unacceptable to request a major landfill expansion based on review of published and unpublished maps and literature as indicated in Section 3.2.2. 34
- 36. Pages 21 and 22 are missing from the document. 35
- 37. Cross-Section A-A and B-B are missing from the document. 36
- 38. Cross-Section A-A and B-B are missing from the document. 37
- 39. As indicated in Section 3.2.2-6 evidence of mass movement in the form of landslide, mud flows, and debris flows have been identified during mapping at the site. These are unstable areas and Federal regulation 40 CFR 258.15 requires detail analyses and evaluation for these conditions. 38
- 40. The Orcutt and Cubertson faults are considered Holocene faults. 40 CFR 258.13 requires a minimum of a 200 foot setback. Please show where this is addressed in the DEIR. 39
- 41. The statement "proper engineering would be conducted such that designed temporary and permanent slopes would include the correct factor of safety (section 3.2.3.1) is unacceptable under the Federal regulations for a landfill expansion. 40
- 42. Federal regulations does not recognize temporary slopes and temporary slope stabilities. All slopes in the landfill are considered permanent and require seismic stability as well as static stability analyses. 41
- 43. A deformation values reported in Section 3.2.3.1.1., the liner, LCR's and landfill cover integrity will be compromised. A detail integrity analyses will be required. 42

- 44. Section 3.2.3.2. indicates that "the proposed project would not result in significant impacts". What is the basis for this statement. Is the final cover studied for this project. 40
- 45. How are the ground motions for final cover estimated and where can it be found in the DEIR. 41
- 46. Section 3.3.2.2.2 indicates seeps and springs where observed at the site. How is the groundwater separation from the refuse achieved. What is the impact to groundwater. How does the landfill comply with State and Federal regulations regarding this. What is the impact on tipping fees if a subdrain system installation and monitoring is required. 41

DOCUMENT 26
SIMI VALLEY LANDFILL AND RECYCLING CENTER
RESPONSE TO COMMENTS

Response 26-1

1. CEQA Guidelines lists criteria for identifying the lead agency when two or more public agencies will be involved with a project:
 - "If the project will be carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency." (Section 15051 (a))
 - "Where more than one public agency equally meet the criteria in subsection (b), the agency which will act first on the project in question shall be the Lead Agency." (Section 15051 (c))

2. Based on the criteria listed in the CEQA Guidelines, VRSD is the appropriate lead agency for the proposed project. VRSD acting as the lead agency for the proposed project is analogous to a city or county acting as the lead agency for a public works project they are implementing. Other agencies (referred to in the CEQA Guidelines as responsible agencies) will use the EIR in the process for issuance of the various permits required for the proposed project. The pertinent requirements of these agencies have been considered in the environmental analyses.

Response 26-2

1. This comment does not explain why it "...seems inappropriate..." for the same consultant to prepare the EIR and to perform engineering and environmental studies for the project. CEQA does not limit the work that a consultant can perform for a project.

Response 26-3

1. As discussed in Section 3.1.3 of the Draft EIR, the proposed project includes various measures to reduce potential environmental impacts that would be implemented through existing rules and regulations including CCR Titles 14 and 23, and Subtitle D. In addition, the topical areas of Chapter 3.0 of the Draft EIR includes operational procedures and regulatory requirements that would be included in the proposed project. Regulatory requirements are not mitigation measures in terms of CEQA and, therefore, it is not appropriate for regulatory requirements to be included in Table 1.1 of the Draft EIR. This table summarizes the potential impacts associated with the proposed project and lists the mitigation measures that are included in the EIR.

Response 26-4

1. As documented throughout Chapter 3.0 of the Draft EIR, various technical studies and analyses have been completed to support the finding that the proposed project can meet the various landfill siting and operational requirements included in CCR Titles 14 and 23, and Subtitle D. Information from pertinent investigations, analyses and references regarding the conditions at the site were analyzed and used to support the findings included in Chapter 3.0 of the Draft EIR. Chapter 6.0 lists the various references used to prepare the Draft EIR. Table 6.1 of the Draft EIR lists specific technical reports prepared to support the Draft EIR and includes the *Focused Geologic Investigation* report (Environmental Solutions, Inc., 1995a) and *Faulting and Seismicity Technical Report* (Environmental Solutions, Inc. 1995b) prepared for the proposed project.

Response 26-5

1. See Response 26-4 above.

Response 26-6

1. This proposed landfill slopes were evaluated for stability under both static and dynamic loading conditions as described in the *Faulting and Seismicity Technical Report* (Environmental Solutions, Inc., 1995b). This report is available for review at VRSD, as noted in the Draft EIR. The evaluation utilized 2-D stability analyses of the lined cut slopes with waste loading. Earthquake loading conditions were evaluated using pseudo-static stability analyses and a refined Newmark-type deformation analysis method.
2. Section 4.2.3 and Table 4.1, in the *Faulting and Seismicity Technical Report*, provide a detailed description of the dynamic properties of soil and rock used in the analyses.

Response 26-7

1. The landfill would be developed in phases and subphases. The excavation of the next subphase would be accomplished on an ongoing basis as the excavated material would be used for daily and intermediate cover material for landfill operations, and for the low permeability soil component of the liner system and final cover. In this way, double handling

and daily stockpiling of cover material would be minimized. Landfill activities, including excavation and placement of cover material is included in the air quality analysis in Section 3.12 of the Draft EIR.

2. The tipping fee and how landfill operations are reflected in the tipping fee are not CEQA issues and are not addressed in the EIR.

Response 26-8

1. The proposed project includes phased closure of completed slopes of the landfill. Phased closure activities would begin early in Phase III and would continue throughout Phase IV (see Figure 2.6 of the Draft EIR). As discussed in Section 2.3.6 of the Draft EIR, sufficient quantities of daily, intermediate and final cover materials are available onsite and would be excavated as part of landfill operations.

Response 26-9

1. The steep slopes (1.2:1, 1.3:1 and 1.5:1) were included in the Slope Stability and Landfill Deformation Analysis (see Section 4.0 of the *Faulting and Seismicity Technical Report*) performed to support the Draft EIR. Static and pseudo-static analyses performed indicate the proposed landfill slopes to be feasible with a adequate factor of safety (a factor of safety greater than 1.5).
2. If proposed cut slopes were less steep than indicated, there would not be an increase in demand for daily cover material as the landfill footprint is not anticipated to be expanded to accommodate the new slope design. Rather the volume of the waste cell and the corresponding daily cover material requirement would be reduced by moving the toe of the slope away from the top of the slope.
3. As discussed in Section 2.3.6 of the Draft EIR, sufficient quantities of daily, intermediate and final cover materials would be excavated as part of landfill operations. Importing of cover materials would not be required to support the proposed project.

Response 26-10

1. As indicated in Section 4.8 of the *Faulting and Seismicity Technical Report*, the computed displacement of the final cover due to a peak ground acceleration of 1.0g would be in the

range of 6 to 12 inches commonly accepted as the allowable range of permanent deformations for landfill slopes (Seed and Bonapart, 1992). If such deformations of the final cover occurred that affected the access road, both the final cover and access road would be repaired as part of the general operation and maintenance of the landfill.

Response 26-11

1. Based on the geologic trenching conducted at the site, landslides and mud flows at the site are surficial in nature and are not deep seated (Fugro, 1992; Environmental Solutions, Inc., 1995a). These surficial features would be excavated as part of the proposed project. As Toland is a canyon landfill, infilling the canyon area with waste would buttress the slopes against future failure. The geologic investigations at the site have determined that these existing surficial features would not represent a geologic hazard to the proposed project, nor would the proposed project result in geologic hazards. Since the detailed design of the proposed project has not been completed, however, a mitigation measure was included in Section 3.2.7 of the Draft EIR to require a slope or foundation stability report be prepared for the final design.

Response 26-12

1. As shown in Table 3.11.6 of the Draft EIR, landfill employees' vehicles are included in the traffic, noise, air quality, and health risk analyses for the proposed project. Also see Appendix F of the Draft EIR for the projected number of vehicles associated with the proposed project on a hourly basis. Appendix F was used as the basis for the various analyses in the Draft EIR that were based on vehicular trips.

Response 26-13

1. Section 2.3.5.3 of the Draft EIR indicates how agricultural and vegetation waste would be handled at the working face. The Draft EIR did not indicate that these waste categories would not be subject to source reduction and composting. The Source Reduction and Recycling Elements (SRREs) for the County and its cities include source reduction and composting strategies for green waste as part of their compliance with AB 939. Even with the implementation of these strategies, however, it is anticipated that a portion of the green waste generated in the County would be landfilled, and this is accounted for in the 1,500 tons of waste per day that could be disposed at Toland under the proposed project.

2. The Draft EIR evaluated impacts based on the maximum of 1,500 tons of waste per day. Operations at levels below 1,500 tpd due to increased recycling or other system changes would extend the life of the landfill, however, overall impacts based on total tons landfilled would not change.

Response 26-14

1. The procedure for closing the landfill prematurely, in the event an earlier closure would be required, is a requirement of CCR Titles 14 and 23 and would be included in the preliminary closure plan for the proposed project. This is a permitting issue and is not a requirement of the EIR.

Response 26-15

1. The 1-foot thick side slope liner protective soil layer will be placed on an as-needed basis in advance of waste placement to prevent contact between waste and the side slope liner. Slope stability for this 1-foot-thick soil layer is not an issue as soil will be placed in approximately 10 to 20 feet increments and if sloughing occurs may be repaired as part of general landfill operations.

Response 26-16

1. See Response 26-15 above.

Response 26-17

1. See Response 26-15 above. Additional soil thickness would not be necessary to stabilize the sideslope protective cover. Therefore, there is no requirement for additional materials.

Response 26-18

1. Prior to utilization of the excavated Pico Formation material for the low permeability soil component of the composite liner, laboratory analyses would be performed to assure the material meets the 1×10^{-7} cm/sec permeability requirements. Previous permeability analyses of the Pico Formation material from the site has determine that it would meet the 1×10^{-7} cm/sec permeability requirement of CCR Title 23 and Subtitle D (SGD, 1988).

A geotechnical analysis at Toland performed to support the permitting of the proposed project has determined that the onsite Pico Formation would meet the 1×10^{-7} cm/sec permeability requirement of CCR Title 23 and Subtitle D (Environmental Solutions, Inc., 1996).

Response 26-19

1. As discussed in Section 2.3.6 and shown in Table 2.6 of the Draft EIR, approximately 211,000 cubic yards of low permeability (1×10^{-7} cm/sec) soil is required for the composite liner system and final cover system for the proposed project. Based on detailed geologic mapping conducted at the site and calculations conducted utilizing the preliminary excavation plan, approximately 3.2 million cubic yards of Pico Formation material would be excavated and available for landfill liner material (Environmental Solutions, Inc., 1996).
2. Geotechnical testing conducted by Staal, Gardner & Dunne in 1986 and 1988 as part of the Solid Waste Assessment Test (SWAT) for Toland (SGD, 1988) determined that the onsite Pico Formation material exhibits the properties to meet the CCR Title 23 and Subtitle D requirements for low permeability soil (i.e., 1×10^{-7} cm/sec). In addition, a geotechnical analysis at Toland performed to support the permitting of the proposed project has determined that the onsite Pico Formation would meet the 1×10^{-7} cm/sec permeability requirement of CCR Title 23 and Subtitle D (Environmental Solutions, Inc., 1996).

Response 26-20

1. State Water Resources Control Board (SWRCB) Resolution No. 93-62 has been adopted to implement Title 40, Code of Federal Regulations Parts 257 and 258 (i.e., Subtitle D). Subsection III.A.3 of SWRCB Resolution No. 93-62 allows alternative sideslope liners for "sideslopes [that] are too steep to permit construction of a stable composite liner." The alternative sideslope liner shall meet the performance criteria contained in 40 CFR §258.40. The proposed sideslope liner therefore meets state and federal regulations.
2. The potential instability of the 2-foot-thick clay liner on 1.2:1, 1.3:1 and 1.5:1 slopes supports the recommendation that the alternative liner included in SWRCB Resolution No. 93-62 is a more suitable design for the proposed project. Increasing the thickness of the clay liner portion of the sideslope liner does not provide additional stability, therefore, a source for such additional material is not required.

Response 26-21

1. The proposed project consists of both a vertical and lateral expansion of Toland. The vertical expansion component of the proposed project includes the placement of additional waste on top of waste already landfilled at the site. Vertical expansions of existing landfills are allowed by state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) without a requirement to excavate previously landfilled waste to allow the installation of a composite liner system. Lateral expansions of existing landfills are required by state and federal regulations to include a composite liner system. Therefore, based on state and federal landfill regulations, the proposed project includes a composite liner for the lateral expansion component of the project.
2. As discussed in 2.5.1 of the Draft EIR, for the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot thick low permeability intermediate soil barrier would be installed. The intermediate soil barrier is not required by state or federal landfill regulations for vertical expansions, however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.

Response 26-22

1. The proposed intermediate soil barrier and LCRS would be constructed of flexible materials and would be designed to have tolerances required to compensate for the expected waste settlement and ground motions. The detail design would be completed during the landfill design process.

Response 26-23

1. As part of the analyses conducted for the proposed project, a seismic evaluation has been completed to determine the site peak ground acceleration (PGA) from the maximum potential earthquake event (MPE) (Environmental Solutions, Inc., 1995b). The PGA of 1.0g was used in the slope stability analyses performed to support the proposed project and it was determined that an adequate factor of safety (i.e., a factor of safety greater than 1.5) can be achieved for the proposed project. The PGA 1.0g would be used during design of the environmental controls systems (e.g., liner, LCRS, landfill gas collection system, surface water drainage) and structures on the landfill.

Response 26-24

1. See Response 26-4 above.

Response 26-25

1. The dynamic properties of refuse utilized during the seismic analysis, as shown in the *Faulting and Seismicity Technical Report*, are adequate for this stage in the evaluation of the proposed project. The dynamic properties utilized are conservative numbers and the stability analysis employed (2-dimension) is additionally conservative with respect to actual 3-dimension properties of the landfill.

Response 26-26

1. Section 2.5.2 of the Draft EIR includes an overview of the LCRS for the proposed project. The detailed design of the LCRS for the proposed project, including the LCRS over the existing waste prism, would be completed as part of the permitting process for the proposed project. This is a permitting issue and is not a requirement of the EIR.

Response 26-27

1. The design and operation of the landfill gas collection system at Toland would have to comply with APCD Rule 74.17. Therefore, an appropriate gas collection system would be installed to assure that landfill gas migration is controlled. The control of gas migration would be demonstrated and monitored through the use of landfill gas monitoring probes and surface monitoring in accordance with APCD Rule 74.17, and through the monitoring of ground water in accordance with CCR Title 23.

Response 26-28

1. An appropriate landfill gas collection system would be installed to assure that gas migration is controlled. The control of gas migration would be demonstrated and monitored through the use of landfill gas monitoring probes and surface monitoring in accordance with APCD Rule 74.17, and through the monitoring of ground water as required by CCR Title 23.

Response 26-29

1. The tipping fee is not a CEQA issue and is not addressed in the EIR.

Response 26-30

1. A detailed slope stability study has been conducted on critical sections of the landfill and have shown the waste and final cover to be stable. The *Faulting and Seismicity Technical Report* has been prepared (Environmental Solutions, Inc., 1995b) to support the Draft EIR and is available for public review at VRSD.

Response 26-31

1. As discussed in Section 2.6 of the Draft EIR, preliminary closure, and postclosure monitoring and maintenance plans would be prepared for the proposed project as part of the permitting process as required by CCR Titles 14 and 23, and Subtitle D. This is a permitting issue and is not a requirement of the EIR.

Response 26-32

1. Low permeability soils for final cover for the proposed project would be excavated from an onsite source (i.e., Pico Formation). The landfill is proposed to undergo phased closure, therefore, stockpiling of low permeability soils would be conducted only for the final landfill phase. Stockpiling impacts would be limited to the control of surface water runoff from the stockpile to prevent siltation of stormwater. This control would be implemented through the interim drainage plan that would be submitted to the County Environmental Health Division on an annual basis in accordance with CCR Title 14, and through the requirements of the NPDES permit that would be issued by the RWQCB.

Response 26-33

1. As discussed in Section 2.6.2 of the Draft EIR, the proposed project would be revegetated during the phased closure of the landfill. As discussed in this section, the vegetative cover would meet the following criteria in accordance with CCR Title 14:
 - Provide effective wind and water erosion protection.
 - Prosper in shallow subsoil conditions.
 - Withstand gas penetration in root zone.
 - Require minimum irrigation and maintenance.
 - Provide protection to low permeability soil layer.
 - Minimize fire hazards.
 - Enhance appearance of the site.

2. As discussed in Section 3.4.3.2 of the Draft EIR, revegetation would consist of herbaceous annuals, perennials, and woody ground cover. The species selected would be drought resistant and require little to no maintenance. Therefore, water usage for irrigation of the revegetated final cover would be minimal. A detailed revegetation plan would be included with the closure plan for the proposed project.

Response 26-34

1. To prepare a comprehensive study to support the information presented in the Draft EIR it is sometimes necessary to conduct specific site investigations. These investigations were conducted by professionals and met the standards of practice for the industry, and were conducted by or under the supervision of registered individuals. Not all completed investigations, however, are compiled into published reports because once the findings of an investigation are known they may be used for a different application or presented in another report. The unpublished findings used to form an opinion regarding the effects of the geologic and seismic conditions at Toland do not lack technical merit simply because they are unpublished, and are supported with the findings of published investigations.
2. As discussed in Response 26-4 above, throughout Chapter 3.0 of the Draft EIR various technical studies and analyses have been completed to support the finding that the proposed project can meet the various landfill siting and operational requirements included in CCR Titles 14 and 23, and Subtitle D. Information from pertinent investigations, analyses and references regarding the conditions at the site were analyzed and used to support the findings included in Chapter 3.0 of the Draft EIR. Chapter 6.0 lists the various references used to prepare the Draft EIR. Table 6.1 of the Draft EIR lists specific technical reports prepared to support the Draft EIR and includes the *Focused Geologic Investigation Report* (Environmental Solutions, Inc., 1995a) and *Faulting and Seismicity Technical Report* (Environmental Solutions, Inc. 1995b) prepared for the proposed project.

Response 26-35

1. A review of a copy of the Draft EIR shows that pages 21 and 22 were not missing; these pages consist of Figure 3.2.8 that shows geologic cross sections A-A' and B-B'. It is possible that Figure 3.2.8 of the Draft EIR was inadvertently missing from the commenter's copy. A minor revision of Figure 3.2.8 has been made, and the revised figure is included in Section 3.2 of this Final EIR.

Response 26-36

1. Regarding the landslides, mud flows, and debris flows at the site, based on the geologic trenching conducted at the site, these features are surficial in nature and are not deep seated (Fugro, 1992; Environmental Solutions, Inc. 1995a). These surficial features would be excavated as part of the proposed project. As Toland is a canyon landfill, infilling the canyon area with waste would buttress the slopes against future failure. The geologic investigations at the site have determined that these existing surficial features would not represent a geologic hazard to the proposed project, nor would the proposed project result in geologic hazards.

Response 26-37

1. Section 3.2.2.7 and Figure 3.2.9 of the Draft EIR discuss and show the relationship between the Orcutt and Culbertson faults with regard to the proposed project. In addition, the geologic trenching and investigation conducted by Fugro (1992) and the *Focused Geologic Investigation* determined that the Culbertson Fault does not extend onto the project site (Environmental Solutions, Inc., 1995a). The conclusion drawn from the above references indicate that no Holocene faults have been identified within 200 feet of the proposed project.

Response 26-38

1. The temporary slopes referenced in Section 3.2.3.1 of the Draft EIR are not required under state or federal regulations (i.e. CCR Titles 14 and 23, and Subtitle D) to be analyzed for slope stability. As a conservative measure, however, they would be analyzed to assure they are stable.

Response 26-39

1. See Response 26-10 and 26-23.

Response 26-40

1. The basis for the geologic conclusion that "...the proposed project would not result in significant impacts..." as stated in Section 3.2.3.2 of the Draft EIR consists of the interaction presented in Section 3.2 of the Draft EIR, the *Focused Geologic Investigation* and the *Faulting and Seismicity Technical Report* (Environmental Solutions, Inc., 1995a; 1995b).

2. The static and pseudo-static slope stability analyses conducted for the preliminary fill plan included the final cover. The details for the slope stability analyses performed are included in the *Faulting and Seismicity Technical Report*.

Response 26-41

1. As discussed in Section 3.3.3.1.1 of the Draft EIR, ground water separation from waste would be achieved by complying with state and federal regulations (i.e., CCR Title 23 and Subtitle D) through maintaining a minimum 5-foot separation between the highest ground water potentiometric elevation and the waste which would result in no impact to ground water.
2. As discussed in Section 3.3.2.2.2 of the Draft EIR, surface seeps and springs are not representative of ground water at the site, but rather are related to rainfall infiltration. Rainfall percolates through the relatively porous terrace deposits until it arrives at the geologic contact with the nonporous Pico Formation. Upon encountering the Pico Formation, the water travels along the contact and ultimately meets the surface. These seeps and springs would be mitigated where necessary through the use of subdrains.
3. The tipping fee is not a CEQA issue and is not addressed in the EIR.

Turner Properties

14731 West Telegraph Road Santa Paula, CA 93060 805-525-2880

OCTOBER 5, 1995

RECEIVED

OCT 23 1995

V. R. S. D.

Ventura County Board of Supervisors
Ventura County Government Center
600 S. Victoria Avenue
Ventura, California 93004

Re Toland Road Landfill Expansion

I am completly against the landfill expansion. Reasons being

- 1. Loss of lives. At least twice a month there is an accident on 126, with 200 or more large vehicles on the highway, how many more lives will be lost? | (1)
- 2. Traffic , which already impacts 126 with speeding vehicles, farm equipment dosent have a chance, It holds up all that speeding traffic | (2)
- 3. Loss of farming- Santa Clara Valley is for farming, not for trash. | (3)
- 4. Air quality and consider the schools nearby. | (4)
- 5. Cost- More for signs, traffic lights, which you will need for 200 trash trucks a day crossing 126, how will another signal help the traffic problem? | (5)

Why Santa Paula? We conceded to a jail on Todd Rd. off 126 and Telegraph, and Yes there is a lot more traffic on 126 and Telegraph Rd. Already.

Until Highway 126 is completly widend and made safe from Santa Paula to Castic, I urge you to please oppose this project.

Truly yours,

Kathleen Turner
Kathleen Turner

DOCUMENT 27
TURNER PROPERTIES - KATHLEEN TURNER
RESPONSE TO COMMENTS

Response 27-1

1. As discussed in Section 3.11.2.5 and depicted in Figure 3.11.4 of the Draft EIR, based on records from Caltrans, the accident rate along Highway 126 in the vicinity of the proposed project site is substantially lower than the statewide average. The highway is a four-lane divided roadway in the vicinity of Toland. Higher accident rates occur east of the project site, particularly east of Fillmore where the highway is only two lanes (with periodic passing lanes). The proposed project would not contribute to additional traffic east of Toland Road, and is not anticipated to appreciably increase the accident risk along Highway 126.
2. The accident data included in Section 3.11.2.5 of the Draft EIR was provided as baseline traffic information and was not meant to imply that the accident rate would remain constant under future conditions. Historical information, is however, relevant in assessing the potential for future accidents. The first step in highway accident prevention is to have accurate and detailed information of circumstances surrounding past accidents (Oglesby and Hicks, 1982). Section 3.11.3.1.3 of the Draft EIR provides the rationale to support the conclusion that the accident risk along Highway 126 is not anticipated to appreciably increase due to the proposed project.
3. The traffic study prepared for the proposed project employed the methodologies recommended by Caltrans for intersection capacity analysis, signal warrants, and highway design. These methodologies have been developed both to optimize traffic flow and assure traffic safety. In addition, as part of its review of the Draft EIR and the supporting traffic study for the proposed project, Caltrans independently performed the signal warrant analysis and concurred that signal warrants are not met for the Toland Road/Highway 126 intersection (see the Comment Letter 02). Based on its review, Caltrans recommended the installation of an intersection control flashing beacon, intersection lighting, and warning signs. These improvements are included in the EIR as mitigation measures and would mitigate potential traffic-related safety issues at the intersection.
4. CEQA provides authority to the lead and responsible agencies to approve a project which may result in significant unavoidable environmental effects. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only

after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impacts associated with the proposed project.

Response 27-2

1. The potential conflict of farm equipment with higher speed vehicles on Highway 126 represents a cumulative project issue. Notwithstanding the traffic conflict identified in this comment, the Draft EIR acknowledged that nonproject-related cumulative traffic on Highway 126 constitutes a significant impact. As discussed in Section 3.11.4.1 of the Draft EIR, traffic on this highway is projected to increase by approximately 79 percent by 2015. Project-related traffic would represent approximately 2.3 percent of the future ADTs under the "worse case" traffic scenario for the proposed project (i.e., waste transported to Toland via packer trucks), and 1.2 percent of the future ADTs for the "proposed case" traffic scenario (i.e., waste transported to Toland via transfer trucks).

Response 27-3

1. Potential project-related impacts to agricultural uses in the Santa Clara Valley are addressed in Section 3.8.3.2.2 of the Draft EIR. Included in the analysis are potential impacts due to changes in the frequency and severity of frosts, the impacts of increased fugitive dust on orchards, and the potential increase in pests. It is also important to note that the proposed project would not take existing or potential agricultural lands out of production. Based on the analysis in the Draft EIR, the proposed project would not have a significant impact on agricultural operations in the vicinity of Toland.

Response 27-4

1. Air quality impacts associated with the proposed project, including the air quality impacts at the Santa Clara School, were addressed in Section 3.12 of the Draft EIR. As discussed in the Draft EIR, air emissions associated with the proposed project would be accompanied by corresponding emissions reductions at Bailard as landfilling operations shift to Toland. Shifting landfilling operations from Bailard to Toland reflects a realignment of waste disposal within the County, and does not represent an increase over the baseline emissions inventory for the County. Therefore, on a County-wide basis, air emissions associated with the proposed landfill operations and onsite equipment at Toland would not represent a significant emissions impact.

2. Notwithstanding that the proposed project represents a shift of air emissions associated with solid waste disposal activities on a County-wide basis, as discussed in Section 3.12.3.2.1 of the Draft EIR, the proposed landfill operations and onsite equipment at Toland were analyzed to determine if the proposed project would result in the exceedance of state or federal ambient air quality standards at or beyond the project boundary. As documented in the Draft EIR, the proposed project would not result in state or federal ambient air quality standards being exceeded at or beyond the project boundary. Therefore, based on the significance thresholds developed by APCD, the air quality impacts associated with the onsite operations under the proposed project would be below a level of significance both on a County-wide and local basis.

3. Offsite mobile air emissions resulting from the additional vehicle miles traveled to Toland versus Bailard to transport 1,500 tons of waste per day, would result in a significant air quality impact on a County-wide basis, but on a local basis would not be significant at the Santa Clara School. It is important to note that as discussed in the Draft EIR, however, the offsite mobile air emissions associated with the proposed project at Toland would be less than transporting 1,500 tons of waste per day to the Simi Valley or Chiquita Canyon landfills.

Response 27-5

1. VRSD has agreed to implement the following traffic mitigation measures at the intersection of Highway 126 and Toland Road as recommended by Caltrans:
 - Intersection control flashing beacon.
 - Timing of beacon to operate only during landfill operation hours.
 - Basic intersection lighting.
 - Installation of W51, "SLOW TRUCKS" signage on Highway 126 in advance of the intersection to warn motorists of the presence of project-related trucks.
 - Signage on Highway 126 to clearly indicate the existence of the Toland Road intersection.

2. The cost of these improvements would be paid by VRSD from the per-ton tipping fee established for the proposed project at Toland. Based on review of the traffic study, Caltrans did not recommend signalization of the Toland Road/Highway 126 intersection and concurred that signal warrants for this intersection would not be met.

SECTION 2.5
INDIVIDUALS
COMMENTS AND RESPONSES

RECEIVED

NOV 06 1995

November 4, 1995

ACCOUNTING

To: Ventura Regional Sanitation Department
Re: Comments and Concerns Related to the DEIR for the Toland Road Landfill Expansion

close proximity to the Santa Paula Airport. An increase in the bird population proposes a very significant danger to the pilots using this airport.

6) This DEIR underestimates the number of existing residences in the area. This report bases information on anywhere from 3 to 15 occupied residences. This is incorrect. There are currently 51 occupied residences in the immediate area.

7) Finally, my most urgent concern addresses the legitimacy of an EIR study done by and for its own lead agency. An objective, outside agency should address the EIR issues. I would never put a fox in charge of my chicken coop, would you?

Charlene S. Bailey

Charlene S. Bailey
12456 Mountain Trail
Moorpark, CA 93021

Co-owner of the A-S
and Strickland Ranches
735 N. Hall Road
Santa Paula, CA 93060

cc: Hon. Maggie Kildoe
Mr. Robert Stone
Mr. Robert Ghirelli
Mr. Donald Koepf
Ms. Judy Mikels
Mr. Robert Sawyer

Although my concerns with this DEIR are numerous, I will try to limit this letter to the most important.

1. This DEIR does not fully address all mitigating circumstances. It even states, "These impacts are considered to be significant and unavoidable even after implementation of feasible mitigation measures." In other words, they admit that this expansion project will create problems they cannot fix.
Examples: Noise level
Air quality
Traffic

2. This DEIR does not adequately address fuel emissions from additional trucks using the Toland landfill. First, there is no study of increased emissions from trucks idling on Highway 126, waiting to turn left onto Toland Road. The DEIR only addresses emissions from free-flowing truck traffic. Secondly, there is no mention of the impact specifically of emissions from diesel fuel, which does not dissipate into the air, but rather settles onto surrounding vegetation, soil, and roads. These emissions will contaminate soil and build up on surrounding citrus trees, causing a significant negative impact. Citrus is a vital part of Ventura County's economy.

3. This DEIR refers to a study done at Cal Poly, Pomona concerning effects of a local dump site on nearby orchards to corroborate the position taken that dust, etc. is insignificant. However, a copy of this study is not included. Questions not answered include: 1) How big was the dump in the study? 2) What was the proximity, variety, and size of the orchards in the study? 3) Was the topography of the land covered in the study? 4) What number of trucks used the dump in the study? This is not a complete nor adequate comparison example, anecdotal at best.

4. Change in the topography is addressed as being an "irreversible impact", but not significant. Not significant to whom? Farmers depend on the canyon winds that prevail in and around the Toland Road area to prevent severe frost damage. This dump is proposed to be 20 stories high, and will interfere with these very insignificant wind patterns. Also, the vertical height of this proposed expansion will be visible from many sites in the valley, having a negative effect on the tourism, the very source of income Ventura County is presently courting.

5. This DEIR does not adequately address the "bird" problem. A landfill of this size will attract seagulls and other birds, as does Ballard landfill. The Toland Road landfill is located in very

**DOCUMENT 28
CHARLENE S. BAILEY
RESPONSE TO COMMENTS**

Response 28-1

1. The comment is correct in noting that the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

2. CEQA provides authority to the lead and responsible agencies to approve a project which may result in significant unavoidable environmental effects. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impacts associated with the proposed project.

Response 28-2

1. The carbon monoxide (CO) analysis has been revised to include the estimated maximum waiting time for vehicles making the left-turn from Highway 126 onto Toland Road, as well as the estimated maximum waiting times for the other turning movements at this intersection. Under existing conditions, plus the proposed project, a maximum delay of approximately 7 seconds for left turn movements from Highway 126 onto Toland Road is estimated (WPA, 1995). This does not represent a significant increase over the approximately 6-second delay currently experienced by vehicles at this intersection. Under buildout cumulative conditions in 2015, which include all sources of traffic, average delays of 19 seconds are estimated for the left turns from Highway 126 onto Toland Road (WPA, 1995).

2. As shown in Revised Table 3.12.12 (see Section 3.2 of this Final EIR), the maximum CO concentrations associated with the proposed project would be 0.8 and 0.6 parts per million by volume (ppmv) for the 1-hour and 8-hour averaging times, respectively. When added to the background CO concentrations of 5.1 and 2.6 ppmv for the 1-hour and 8-hour average, respectively, the proposed project would not exceed the ambient air quality standard for CO (see Revised Table 3.12.12). Therefore, the revision of the CO analysis does not alter the findings or conclusions of the EIR.
3. Emission factors for vehicle exhaust used in the Draft EIR are based on the most recent version (EMFAC7F1.1) of CARB's computer model. These emission factors are classified by type of vehicle (e.g., heavy duty trucks), type of fuel (e.g., diesel), type of exhaust control system (e.g., catalytic), speed, ambient temperature, and year of operation. Therefore, the analysis in the Draft EIR appropriately includes emissions from diesel trucks transporting waste to Toland as part of the proposed project.

Response 28-3

1. As requested, a copy of the report entitled, *Agricultural Impact Report: The Potential Impact on Local Agriculture from the Proposed Rail-Cycle Bolo Station Landfill* by Edwin Barnes, Ph.D., of Cal Poly Pomona is included in Appendix F of this Final EIR.
2. The Spadra Landfill (Spadra) referenced in the report by Dr. Barnes is operated by the Los Angeles County Sanitation Districts. Spadra has been in operation since 1957. It is currently permitted to receive 3,000 tons of waste per day. The landfill is located in a canyon in the foothills surrounding Cal Poly Pomona. Spadra handles approximately 520 vehicles per day. Cal Poly Pomona farms approximately 700 acres in close proximity to the landfill, including 50 acres of citrus, avocados, and grapes. The closest orchards are located less than one-quarter mile from the landfill, with the furthest orchards located approximately 1 mile from the landfill.
3. Dr. Barnes served for five years as the Cal Poly Pomona farm manager. As stated in his report, he believes that the landfill has had no effect on orchards or other crops at Cal Poly Pomona. As stated in his report, Dr. Barnes has not observed negative effects on crop yield or quality, fruit size, color, shape, or flavor that could be attributed to the landfill. He also noted, that as part of an expansion of Spadra, more than 3 million cubic yards of earth are being excavated and stockpiled and that heavy watering of the site has minimized dust from the landfill. Dr. Barnes

indicated that dust from unpaved internal roads within the campus of Cal Poly Pomona is a much greater problem for agricultural operations than the dust from Spadra.

Response 28-4

1. The analogy to a 20-story building in this comment is not meteorologically equivalent, because the proposed project would not block air movement. Air will still cool after sunset and will drain down the face, regardless of its position. Airflow from the new face of the proposed project would not be significantly different than the existing airflow from the side canyon and, therefore, no significant change would occur in the airflow at the location of orchards and other agricultural land in the main canyon.
2. As discussed in Section 3.8.3.2.2 of the Draft EIR, filling the side canyon would not change the airflow in the main canyon by more than a 0.5 percent ratio in air volumes. This 0.5 percent maximum possible effect on airflow is judged to be insignificant compared to the much larger variability in the meteorological and topographical variables that affect frost formation.
3. As discussed in Section 3.9 of the Draft EIR, views of the landfill from surrounding areas are restricted due to the elevation and topographical characteristics of the project site. Surrounding orchards also act as a visual screen. As discussed in Section 3.9.2.3 of the Draft EIR, Toland is not located within a designated or eligible scenic County or state scenic resource area, scenic corridor, or on a designated or eligible scenic highway. In addition, the proposed project would not be visible from designated or eligible scenic areas or scenic highways.
4. The determination that there would be no significant impacts from the proposed project with regard to visual characteristics was based on the minimal amount of newly disturbed acreage associated with the proposed project, in addition to the project being a continuation of current landfilling activities. As demonstrated in Figures 3.9.3 through 3.9.5 of the Draft EIR, the proposed project would not extensively alter the natural appearance of the area. Therefore, impacts with regard to visual characteristics are not considered significant.

Response 28-5

1. Toland does not currently attract birds and is not used as a loafing area by gulls. It is speculative as to whether gulls or other bird species would be attracted to Toland due to the

- proposed project. Similarly, it is speculative as to whether gulls would come in conflict with the Santa Paula Airport. Issues that are speculative cannot be evaluated, therefore, the possibility that Toland may attract gulls or other bird species and the potential that gulls could come in conflict with the Santa Paula Airport is not specifically addressed in the EIR. As discussed in Section 3.14.3.1.1 of the Draft EIR, however, Toland would be operated in compliance with CCR Title 14, including the following operational procedures (see Section 3.14.5 of the Draft EIR) that are known to be effective in minimizing birds at landfills:
- Compaction of waste at the active working face.
 - Periodic 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.
 - The working face would be kept as small as safely practicable, given the type of and number of landfill equipment working there.
 - An active litter control program.
2. As discussed in Section 3.14.3.1.1 of the Draft EIR, in the event birds are determined to be a nuisance at Toland, additional measures would be implemented and may include, but not be limited to, the use of an overhead nylon line grid system (bird wires), distress tapes, propane cannons, and/or habitat manipulation/modification. The effectiveness of these measures would be monitored and, if found not to be effective, additional measures would be developed. To formalize this requirement, a mitigation measure has been included in this Final EIR regarding the use of additional measures in the event birds are determined to be a nuisance at Toland. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.
3. As part of the permitting process, VRSD will coordinate with the FAA regarding the Santa Paula Airport.

Response 28-6

1. Appropriately, the Draft EIR evaluates different geographical areas for various environmental impacts. For example, the noise analysis considers the residences within a specific noise contour which could be impacted by the proposed project (for both onsite and offsite noise impacts), whereas the land use compatibility section addresses potential impacts to residences within a larger geographical area. As noted in Table 3.8.1, based on a review of a 1994 aerial photograph of the project site and vicinity, there are fewer than 10 residences within one mile

of the landfill. This was based on a conservative interpretation of which structures are residences and which are auxiliary agricultural buildings.

2. This comment does not provide the geographic area (i.e., distance from the landfill) in which the 51 residences are located. Therefore, it is not possible to compare the accuracy of the comment's information with the data provided in the Draft EIR.

Response 28-7

1. CEQA Guidelines lists criteria for identifying the lead agency when two or more public agencies will be involved with a project:
 - "If the project will be carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency." (Section 15051 (a))
 - "Where more than one public agency equally meet the criteria in subsection (b), the agency which will act first on the project in question shall be the Lead Agency." (Section 15051 (c))
2. Based on the criteria listed in the CEQA Guidelines, VRSD is the appropriate lead agency for the proposed project. VRSD acting as the lead agency for the proposed project is analogous to a city or county acting as the lead agency for a public works project they are implementing.
3. Other agencies (referred to in the CEQA Guidelines as responsible agencies) will use the EIR in the process for issuance of the various permits required for the proposed project. The pertinent requirements of these agencies have been considered in the environmental analyses.

RECEIVED

OCT 6 1995

V. R. S. D.

402 San Miguel Way
 Santa Paula, California 93060
 October 15, 1995

VRSD Headquarters
 1001 Partridge Drive, Suite 150
 Ventura, California 93003

To Whom It May Concern:

Attached is my written statement of concern regarding the proposed expansion of the Toland Road Landfill.

Please read and seriously consider it, and include it in the reports and documents being filed on this issue.

Sincerely,

Linda Bartelton
 Linda Bartelton

2.5-7

PUBLIC HEARING

TOLAND ROAD LANDFILL EXPANSION

OCTOBER 19, 1995

I'm here tonight to tell you my story. August 26, 1983, was a very memorable day in my life and in the life of my family. That was the day I was in a head-on collision with a truck on our notorious Hwy 126, between Santa Paula and Fillmore. The driver was suspected of having fallen asleep and had crossed into the lane of on-coming traffic -- my lane. 126, -- whose record of fatalities had even in 1983 placed it in the top ten for the state -- it's probably moved up on that list today. The car was totaled. My daughter in the back was spared, -- and but by the grace of God, I came close to never seeing another sunrise. As it was, I had multiple nose fractures, a cracked rib, a severed facial vein, and cuts and bruises in places I hadn't known were part of my body. I hurt everywhere. -- But the man in the camper in front of me wasn't as lucky. The cab of the truck had rolled over on him and crushed him, --leaving five children instantly fatherless.

Why do I tell you my story? Because I know that by expanding the Toland Road Landfill there will not just be more traffic, but more accidents and fatalities, -- and the people of Santa Paula and Fillmore are the most at risk because we travel 126 more frequently than most other Ventura County residents. These are my friends, my family, my neighbors. We are REAL. We have NAMES. We have FACES. Our survival shouldn't be dependent on a mere convenient corporate decision.

I don't have to tell you that when the Toland Road Landfill was first developed it was never intended to later be expanded. When 200+ trucks per day are added to 126, I don't have to tell you the statistics on the resultant emissions that would not only poison and pollute our environment, but would negatively affect the production of our agriculture, -- yes agriculture, whose marketing success is crucial to the viability of our entire County. I don't have to tell you that the resultant overuse of our local water system and seepage will destroy our water resources and threaten our entire fertile valley. No, you are aware of all of these facts -- disregarding them -- and proceeding headlong into making this a done-deal. Well, slam--dunk! And Public Hearings are just a troublesome requirement that will soon be over.

Public Hearing
Toland Road Landfill Expansion
October 19, 1995
Page 2

I am here to appeal to you not only as a private citizen and survivor of 126, but as a wife and mother. You CANNOT DISREGARD the increased risk of accidents, injuries, and fatalities you will be inviting to Highway 126 and its access roads if this dump site is expanded. Make this personal if you have to hear what I'm saying. Think of your own family's increased risk if they lived in our communities and had to use 126, perhaps daily, to go to work, go to school, get to Interstate 5 to go anywhere in northern or southern California. We're talking about a major artery to anyplace we need to go outside of this county, much of which is a two-lane highway.

1
CONT.

2.5-00

I appeal to your consciences. If you go ahead with this expansion you CANNOT ESCAPE the responsibility for the carnage on 126 which is sure to increase. Think about this seriously, -- lives are not trivial things, -- and once this decision is made it will be irreversible.

Thank you.

Linda Bartelson

Linda Bartelson
Private Citizen/Survivor of Hwy 126
Wife and Mother

**DOCUMENT 29
LINDA BARTELSON
RESPONSE TO COMMENTS**

Response 29-1

1. The commenter's opposition to the proposed project is noted. Potential project-related impacts to agricultural uses in the Santa Clara Valley are addressed in Section 3.8.3.2.2 of the Draft EIR. Included in the analysis are potential impacts due to changes in the frequency and severity of frosts, the impacts of increased fugitive dust on orchards, and the potential increase in pests. It is also important to note that the proposed project would not take existing or potential agricultural lands out of production. Based on the analysis in the Draft EIR, the proposed project would not have a significant impact on agricultural operations in the vicinity of Toland and, therefore, would not affect the marketing success or viability of this industry in the County.

2. The project's potential impacts to ground water quantity within the Santa Paula-Sespe Basin and indirectly to the Oxnard Plain are addressed in Section 3.3.3.1.2 of the Draft EIR. As concluded in Section 3.3.8 of the Draft EIR, the mitigation measures as included in Section 3.3.7 would reduce the proposed project's incremental contribution to the cumulative overdraft condition of the Oxnard Plain to below a level of significance. A revised mitigation measure is included in Table 1.1 of this Final EIR that, if the water for the proposed project cannot be offset by the reduction in water usage by VRSD at other landfills, VRSD shall pay the County Public Works Agency to purchase water from the State Water Project to recharge the ground water basin.

3. The quality of water from offsite seeps is addressed in Section 3.3.2.2.2 of the Draft EIR. As concluded in the Draft EIR, based on an investigation conducted by Environmental Solutions, Inc. (1995d), Toland is not the source of seeps in the canyon area located northeast of the landfill, and hydrogeologic conditions preclude the landfill from being a potential source of surface water seeps located in the sidewalls of the canyon.

4. As discussed in Section 3.11.2.5 and depicted on Figure 3.11.4 of the Draft EIR, based on records from Caltrans, the accident rate along Highway 126 in the vicinity of the proposed project site is substantially lower than the statewide average. The highway is a four-lane divided roadway in the vicinity of Toland. Higher accident rates occur east of the project site, particularly east of Fillmore where the highway is only two lanes (with periodic passing lanes).

Since the proposed project would not contribute to additional traffic east of Toland Road, it is not anticipated to appreciably increase the accident risk along Highway 126 east of Toland Road. In addition, because the proposed project would represent approximately 2.3 percent of the future average daily trips (ADTs) for the "worse case" traffic scenario (i.e., packer trucks to transport waste to Toland) on Highway 126 and 1.2 percent of the ADTs for the "proposed case" traffic scenario (i.e., transfer trucks to transport waste to Toland), the proposed project is not anticipated to appreciably increase the accident risk along Highway 126.

5. The accident data included in Section 3.11.2.5 of the Draft EIR was provided as baseline traffic information and was not meant to imply that the accident rate would remain constant under future conditions. Historical information is, however, relevant in assessing the potential for future accidents. The first step in highway accident prevention is to have accurate and detailed information of circumstances surrounding past accidents (Oglesby and Hicks, 1982). Section 3.11.3.1.3 of the Draft EIR provides the rationale to support the conclusion that the accident risk along Highway 126 is not anticipated to appreciably increase due to the proposed project.
6. The traffic study prepared for the proposed project employed the methodologies recommended by Caltrans for intersection capacity analysis, signal warrants, and highway design. These methodologies have been developed both to optimize traffic flow and assure traffic safety. In addition, as part of its review of the Draft EIR and the supporting traffic study for the proposed project, Caltrans independently performed the signal warrant analysis and concurred that signal warrants are not met for the Toland Road/Highway 126 intersection (see Comment Letter 02). Based on its review, Caltrans recommended the installation of an intersection control flashing beacon, intersection lighting, and warning signs. These improvements are included in the EIR as mitigation measures and would mitigate potential traffic-related safety issues at the intersection.

**PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND
CLOSURE/POSTCLOSURE**

RECEIVED

NOV 30 1995

V. R. S. D.

Submit to VRSD representative at the Public Meeting, or mail or hand deliver to: Ventura Regional Sanitation District, Attention: District Manager, 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or hand delivered comments must be received at the above address by 5:00 p.m. on Monday, November 6, 1995.

THIS DRAFT APPEARS TO SHRUG OFF THE IMPORTANCE OF NEGATIVE ENVIRONMENTAL FACTORS, INCLUDING AIR POLLUTION, WATER CONTAMINATION, THE BAD EFFECT ON AGRICULTURE, REDUCED QUALITY OF LIFE FOR NEAR-BY RESIDENTS, TRAFFIC AND NOISE PROBLEMS FOR SANTA PAULA AND FILLMORE.

1

THE EXPANSION OF TOLAND RD. LANDFILL IS NOT A GOOD IDEA, ENVIRONMENTALLY, AND THIS DRAFT DOES NOT REFLECT THE TRUE LOCAL IMPACT.

Submitted By: DOROTHY BRANDT
Name (please print)
972 LOMA VISTA PLACE
Street Address
SANTA PAULA, CA 93060
City State Zip

**DOCUMENT 30
DOROTHY BRANDT
RESPONSE TO COMMENTS**

Response 30-1

1. The commenter's opposition to the proposed project is noted. The potential impacts of air quality, water quality, agriculture, traffic, and noise associated with Toland were evaluated in detail in the Draft EIR (see Sections 3.12, 3.3, 3.11 and 3.10, respectively). As summarized in Section 1.3.2 of the Draft EIR and as discussed in detail in the topical sections of Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

2. Quality of life is subjective, based on a combination of many separate factors (e.g., visual character, surrounding land use, noise, traffic, etc.). These factors have been addressed individually in Sections 3.2 through 3.15 of the Draft EIR.

3. CEQA provides authority to the lead and responsible agencies to approve a project which may result in significant unavoidable environmental effects. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impacts associated with the proposed project.

November 5, 1995

TO: Ventura Regional Sanitation District
FROM: Steven Brooks, 567 N. Mill St., Santa Paula, CA
RE: Toland Landfill Comments on the DEIR

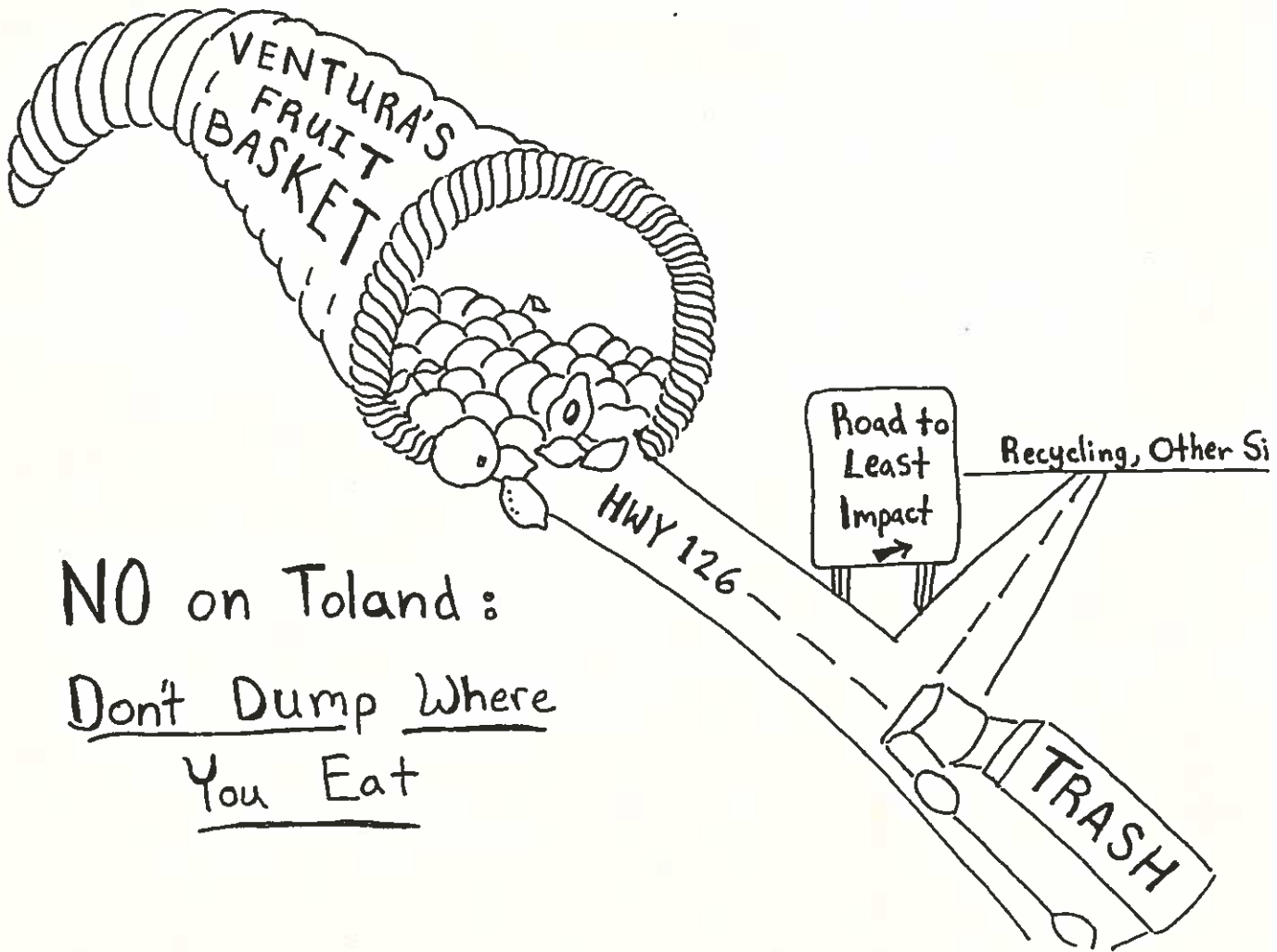
RECEIVED

NOV 6 1995

V. R. S. D.

Please seriously reconsider the environmental impacts of the proposed Toland Landfill expansion. My wife, Heather Davis, and many of our friends have written you regarding the flaws in your draft EIR. Their words have eloquently stated the problem of expanding Toland. Rather than repeat the same objections, I offer my comments in the following drawing:

1



NO on Toland:
Don't Dump Where
You Eat

**DOCUMENT 31
STEVEN BROOKS
RESPONSE TO COMMENTS**

Response 31-1

1. The commenter's opposition to the proposed project is noted. As summarized in Section 1.3.2 of the Draft EIR and as discussed in detail in the topical sections of Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

2. CEQA provides authority to the lead and responsible agencies to approve a project which may result in significant unavoidable environmental effects. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impacts associated with the proposed project.

32

RECEIVED

NOV 6 1995
V. R. S. D.

James F. Brucker
P.O. Box 871
Santa Paula, CA 93061
(805) 525-9550

Ventura Regional Sanitation District
Mr. Clinton L. Whitney
1001 Partridge Drive, Suite 150
Ventura, Ca. 93003-5562

11/6/95

Dear Mr. Whitney:

As owner of property adjacent to the existing Toland Road Landfill Operation, A.P. # 41-140-02, please include the following comments and response to the DEIR circulated September 21, 1995.

Pursuant to my letter dated 3/29/95, in response to the notice of intent, it appears that upon review of the DEIR, that specific issues raised in my letter were not included as part of the DEIR. See enclosed copy.

Ventura Regional Sanitation District did, per the request made in my letter dated 3/29/95, conduct a survey of the boundary of the existing landfill as it abuts my property. I met at the property with Mr. Mark Zible, Council to Ventura Regional Sanitation District, and observed property markers that indicated the property boundary. It appeared from observation of the newly placed property markers, that the landfill operation had caused erosion of the property boundary. Specifically, an existing fence was observed to be suspended in mid-air, and that erosion or landslide, caused by the removal of material at the base of the common slope causing a slope in excess of 1:2:1, as identified as cut slope in the DEIR Figure 2.5 Conceptual Preliminary Excavation Plan Page 2-8, had caused a significant portion of my property along the common property line to either erode or fall away into the Landfill operation. Note, that the proposed contour lines found in Figure 2.5, closely follow the existing contour lines and elevations and show recontouring. I assume, to create a uniform site slope condition.

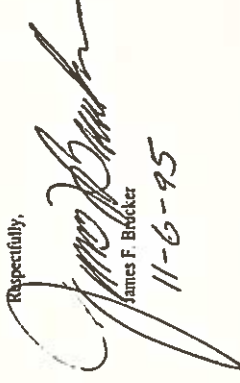
Section 3.4.2.1.A Barren Areas, of the DEIR specifically comments that "barren areas occupy much of the site", and "Most of these onsite disturbed areas are devoid of vegetation. The naturally-disturbed areas appear to be subject to landslides during storm events. These steep, erasive soils have a low probability of supporting vegetation,". In as much as the DEIR acknowledges landslide prone conditions as a result of Landfill Operations, it is logical to assume that the proximity of my property to the steep slope at the northerly boundary of the existing landfill operation has been impacted by landslides. I request that a mitigation measure be provided to stop the erosion and resulting possible landslides that will cause damage to my property.

Furthermore, with respect to erosion as it may impact land stability on "Barren Areas", Appendix C of the DEIR, Hydrology, Page c-13, Hydrology Map for Toland Road Landfill, (Existing Condition), clearly shows flow coming from my property onto the Existing Landfill Operation. The (Proposed Condition), Page C-14 shows the same flow from my property. Again, since no Mitigation Measure has been proposed to mitigate the possibility of erosion or landslide of adjacent properties, I request that one be provided to insure proper protection of my property from damage caused by the extensive earthwork, Cut and Fill Operations, both existing and anticipated.

2.5-15

32

If after review of the existing site conditions and proposed improvements, per my original letter, Ventura Regional Sanitation District must compensate me for damages caused to my property by the ongoing operations of the Toland Road Facility, repair my property to it's pre-existing condition, provide mitigation Measures sufficient to guarantee that no further damage will be caused to my property, or acquire property from me sufficient to guarantee that no property owned by me will be in any way impacted by the activities of Ventura Regional Sanitation District.

Respectfully,

James F. Brucker
11-6-95

1
CONT

James F. Brucker
P.O. Box 871
Santa Paula, CA 93061
(805) 525-9550

RECEIVED

Ventura Regional Sanitation District
Mr. Clinton L. Whitney
1001 Partridge Drive, Suite 150
Ventura, Ca. 93003-5562

MAR 30 1995

V. R. S. D.

3/29/95

Dear Mr. Whitney:

As property owner of land adjacent to the existing Toland Landfill operation, A.P. # 41-140-02, it has come to my attention that the existing landfill operation has caused damage and soil loss to the toe of the slope on my parcel.

It appears that grading operations at the northerly portion of the landfill operation have encroached onto my parcel, causing a significant portion of the slope on my property to be undermined and thereby extended the landfill operation onto my property.

I feel that the Ventura Regional Sanitation District should, at minimum, conduct a field survey by a licensed surveyor to verify the existing property boundaries and make repairs to any damage caused as a result of ongoing activities at the Toland Landfill and cease all activities contributing to the problem. If repair of the damage is not practical or possible as recommended by a licensed soils engineer, the Ventura Regional Sanitation District should compensate me for damage caused to my property and/or present me with a proposal to acquire property necessary to continue it's existing operation and any future operations.

The scoping of the proposed Environmental Impact Report should include mitigation measures to address the existing problem and problems that would occur as the result of the proposed expansion. In consideration of the fact that this problem is ongoing, with or without the certification of the proposed Environmental Impact Report for the landfill expansion, I urge Ventura Regional Sanitation District to take immediate action to insure that this problem is appropriately addressed.

Sincerely,

James F. Brucker
CUB/JFB

James F. Brucker

**DOCUMENT 32
JAMES F. BRUCKER
RESPONSE TO COMMENTS**

Response 32-1

1. While it is agreed that the northeast portion of the canyon in which Toland is located includes a steep (1.2:1) sideslope that is subject to erosion, the geologic investigation of the site conducted to support the Draft EIR does not agree with this comment's assumption that ongoing landfill operations at Toland has caused the sideslope to erode. As part of its ongoing operation of Toland, VRSD has not removed material from the base of the sideslope in the northeast portion of the canyon, nor has VRSD altered the steep sideslope. Therefore, the erosion of the sideslope is naturally occurring and is not caused by the existing operation of Toland nor would it be exacerbated by the proposed project. It is important to note that Figure 2.5 of the Draft EIR is the proposed preliminary excavation plan for the proposed project and the 1.2:1 "cut slope" referenced in this comment does not currently exist, rather, the naturally eroded sideslope has a slope that ranges from 1.3:1 to 1.2:1.

2. Regarding existing landslides, mud flows, and debris flows at the site, based on the geologic trenching conducted at the site, these features are surficial in nature and are not deep seated (Fugro, 1992; Environmental Solutions, Inc. 1995a). These surficial features would be excavated as part of the proposed project. As Toland is a canyon landfill, infilling the canyon area with waste would buttress the slopes against future failure. The geologic investigations at the site have determined that these existing surficial features would not represent a geologic hazard to the proposed project, nor would the proposed project result in geologic hazards offsite.

Response 32-2

1. See Response 32-1 above.

Dora P. Crouch, Ph.D.
Architectural and Urban History
739 Yale St. #6B
Santa Paula, CA 93060, U.S.A.
885-933-1140
October 30, 1995

R E C E I V E D

OCT 31 1995

V. R. S. D.

Ventura Regional Sanitation District
 Attention: District Manager
 1001 Partridge Drive, Suite 150
 Ventura, CA 93003-5562

RE: Toland Road Landfill Expansion

Dear Public Servants:

It was quite distressing to experience the impervious attitudes of the persons who presided at the Oct. 19 meeting in Santa Paula about the Toland Landfill. Let me hearby urge you to consider seriously the destructive effects of such an expansion.

The Santa Clara River valley, in my opinion, one of the two most beautiful places on earth. I speak as one who has traveled widely, and chosen to live in Santa Paula because it is in the middle of such beauty. All public servants, agencies, and corporations working here owe it to the high quality of this beauty to treasure the valley and preserve its clear air, natural changes of light and atmosphere, and serenity. We are not dealing here with downtown Detroit or some other area where the scenery is already so ugly that nothing we do can make it worse. On the contrary, this valley should be preserved and treasured as being among the very greatest beauties of earth.

I urge the responsible decision makers to safeguard this intangible beauty with as much diligence as they safeguard our individual properties.

Most sincerely,

Dora P. Crouch

Dora P. Crouch
 Professor Emeritus of Architectural History, School of Architecture
 Rensselaer Polytechnique Institute, Troy, New York

**DOCUMENT 33
DORA P. CROUCH, PH.D.
RESPONSE TO COMMENTS**

Response 33-1

1. The commenter's opposition to the project is noted; however this comment does not raise an issue regarding the information included in the Draft EIR.

2. The potential impacts of air quality, water quality, agriculture, traffic, and noise associated with Toland were evaluated in detail in the Draft EIR (see Sections 3.12, 3.3, 3.11 and 3.10, respectively). As summarized in Section 1.3.2 of the Draft EIR and as discussed in detail in the topical sections of Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

3. Quality of life is subjective, based on a combination of many separate factors (e.g., visual character, surrounding land use, noise, traffic, etc.). These factors have been addressed individually in Sections 3.2 through 3.15 of the Draft EIR.

4. CEQA provides authority to the lead and responsible agencies to approve a project which may result in significant unavoidable environmental effects. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impacts associated with the proposed project.

SANTA PAULA, CA
NOV 3, 1995

VENTURA REGIONAL SANITATION DISTRICT
1001 PARTRIDGE DR, SUITE 150
VENTURA, CA 93003-5562
ATTN: GENERAL MANAGER
V.R.S.D.

RECEIVED

NOV 6 1995

AS A PROPERTY OWNER AND AVOCADO GROWER ON LAND LOCATED APPROXIMATELY ONE HALF MILE WEST OF THE TOLAND LAND FILL SITE I HAVE REVIEWED THE DRAFT AIR VERY CAREFULLY AND FIND THAT IT DOES NOT ADEQUATELY RECOGNIZE THE IMPACT THAT DUST AND ALTERED AIR CURRENTS WILL HAVE ON MY ABILITY TO CONTINUE GROWING AVOCARDS AT THAT LOCATION.

1
WHILE MUCH IS SAID ABOUT DUST CONTROL IN THE REPORT AND THAT "VEHICLES AND EQUIPMENT SHALL BE PROHIBITED FROM TRAVELING ON AREAS OF THE LANDFILL THAT ARE NOT WATERED FOR DUST CONTROL" I FIND IT HARD TO BELIEVE THAT THESE MITIGATING MEASURES WILL REDUCE DUST EMISSIONS CREATED DURING THE HARVESTING AND HANDLING OF THE COVER MATERIAL. DUST EMISSIONS FROM THIS SOURCE WILL INCREASE TEN FOLD AND BECOME A GREATER PROBLEM AS WORK AT THE SITE REACHES HIGHER ELEVATIONS THAT ARE EXPOSED TO PREVAILING AIR CURRENTS AND RISE ABOVE THE ELEVATION ON NEARBY PROPERTIES. NO EXPLANATION IS GIVEN ON HOW THE COVER MATERIAL WILL BE CHEMICALLY

HEAVY EQUIPMENT FROM THE SURROUNDING HILLSIDES. CURRENTLY MY AVOCADO TREES ARE INFESTED WITH A SERIOUS PEST, PERSEA MITE. THE MOST EFFECTIVE WAY TO FIGHT THIS PEST IS WITH BENEFICIAL INSECTS WHICH I AM DOING WITH THE HELP OF ASSOCIATES INSECTARY IN SANTA PAULA. BENEFICIALS CANNOT DESTROY THE PERSEA MITE EGGS HOWEVER IF THE LEAVES ARE EXPOSED TO DUST IT IS VITAL THEREFORE, THAT THE TREES BE MAINTAINED IN A DUST FREE ENVIRONMENT. I BELIEVE THAT THE INCREASE IN DUST EMISSIONS FROM YOUR PROPOSED LANDFILL EXPANSION WILL PREVENT ME FROM SUCCESSFULLY ERADICATING THE PERSEA MITE.

1
IN THE DRAFT REPORT THERE ARE STATEMENTS ABOUT NORMAL AIRFLOWS FROM HILLSIDES AND CANYONS. THESE ARE THE AIRFLOWS THAT MAKE IT POSSIBLE TO GROW FROST SENSITIVE AVOCARDS WHERE WE DO. HOWEVER, ON APPROXIMATELY ONE NIGHT OUT OF ONE THOUSAND (EVERY 3 OR 4 YEARS) WE GET SUPERCOOL AIR FROM THESE HIGHER ELEVATIONS AND MUST RELY ON FROST PROTECTION OR THE WARMER DRIFT THAT FLOWS FROM EAST TO WEST AFTER MIDNIGHT ON THESE ABNORMAL FREEZE NIGHTS. MY TREES AT THE 1300' ELEVATION LEVEL BENEFIT FROM THIS WARMER EAST TO WEST DRIFT THUS AVOID SERIOUS FROST DAMAGE WHEN YOUR EXPANDED LANDFILL REAPPEARS

AN ELEVATION ABOVE 1500' IT WILL BLOCK
 THIS WINDMILL EAST TO WEST DRIFT BECAUSE
 MY AVOCADO TREES AND ORCHARD TO SUFFER
 SERIOUS FROST DAMAGE.

THE CONCLUSIONS IN THE REPORT THAT
 IMPACTS ON MY AGRICULTURE OPERATION ARE
 "NOT SIGNIFICANT" ARE NOT VALID.

2
 CONT.

Bennett R. Curtis
 BENNETT R. CURTIS

805 GREENT RD
 SANTA PAULA, CA 93060

**DOCUMENT 34
BENNETT CURTIS
RESPONSE TO COMMENTS**

Response 34-1

1. The comment raises a concern over dust from the proposed project and its effect on biological control of the perseia mite, a pest that damages avocado trees. As noted in Section 3.8.3.2 Draft EIR Section 3.8.3.2.2, the proposed project would not increase PM₁₀ concentrations and associated deposition more than a small proportion above its current background level. Experience at the Spadra and Highgrove landfills indicated that fugitive dust emitted by travel on dirt roads in orchards and other agricultural areas was more of a concern in depositing dust on plants and causing adverse effects (Barnes, 1993).
2. In response to this and other comments, a mitigation measure has been included in the EIR to install a wheel washing station that vehicles leaving the landfill active working face on the dirt road would pass through at the "apron," which is the transition section at the end of the paved road where it becomes a dirt road. The inclusion of this mitigation measure in this Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.
3. The wheel washing station would work in conjunction with the mitigation measures included in Section 3.12.7 of the Draft EIR that require the apron to be flushed with water often enough to assure that the tires cannot track out dirt or mud, and that the onsite paved road shall be swept or water flushed. This combination of measures would significantly reduce the amount of dirt vehicle tires would carry onto Toland Road.
4. At any point in time, only a small area of dirt cover borrow material, dirt road, and dirt working area in front of the active face is exposed and subject to wind erosion. These areas are treated (e.g., watered) to minimize fugitive dust emissions. Dirt areas of the landfill that make up the rest of the cover borrow piles, top deck of the landfill, and elsewhere that are not being actively disturbed by equipment are treated with water or chemical dust suppressants to sufficiently eliminate emissions of fugitive dust.
5. Based on this and other comments, a mitigation measure has been included in the EIR that shall require VRSD to pave, or pay the cost to pave, unpaved roads in the vicinity of Toland to mitigate the PM₁₀ generated by the proposed project. The linear feet of unpaved road to be

paved shall be developed in consultation with the APCD and shall be sufficient to offset the PM₁₀ concentrations from project sources (i.e., offsite mobile emissions and onsite emissions). Based on a preliminary analysis, paving approximately 27,500 linear feet (i.e., approximately 5.2 miles) of unpaved roads in the vicinity of Toland would offset the PM₁₀ generated by the "worse case" traffic scenario (i.e., 450 vehicles per day versus the "proposed case" of 210 vehicles per day). The actual linear feet of unpaved road required to be paved to offset the PM₁₀ generated by the proposed project would be based on the number vehicles traveling to the site on a daily basis. Therefore, potential impacts from the emission of fugitive dust from these dirt roads before paving will be decreased the same amount that the potential impact of the PM₁₀ emissions from the proposed project might increase. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 34-2

1. As discussed in Section 3.8.3.2.2 of the Draft EIR, the combined Timber Canyon and O'Leary Creek airsheds contain the volume of air that could possibly be impacted by the proposed project. The analysis in the Draft EIR considered the maximum geographical extent for possible frost effects.
2. The discussion of frost in the Draft EIR agrees with the comment about the importance of movement of air to frost formation (see paragraphs 6 and 7 on page 3.8-33 of the Draft EIR). The analysis in the Draft EIR concludes that the incidence of frost would not be affected by a change in the topography from the proposed project which is calculated to represent a 0.5 percent reduction in the air volume of the combined Timber Canyon and O'Leary Creek airshed. The proposed project would change the ground height in the landfill within the side canyon, where no agriculture exists, but would not block nor divert down canyon/down valley air flow where agriculture does exist. The evolving landfill simply moves the side canyon walls, where the air drainage begins, forward towards the canyon mouth.
3. As discussed in Section 3.8.3.2.2 of the Draft EIR, filling the side canyon would not change the airflow in the main canyon by more than a 0.5 percent ratio in air volumes. This 0.5 percent maximum possible effect on airflow is judged to be insignificant compared to the much larger variability in the meteorological and topographical variables that affect frost formation. Air will still cool after sunset and will drain down the face, regardless of its

position. Airflow from the new face of the proposed project would not be significantly different than the existing airflow from the side canyon and, therefore, no significant change would occur in the airflow at the location of orchards and other agricultural land in the main canyon.

4. As discussed in Section 3.8.3.2.2 of the Draft EIR and in this response, it has been shown that a land feature the size of the proposed project would not alter frost damage patterns where they matter, which is at the location of the orchards, not in the side canyon. In addition, as can be seen in Figures 3.8.1 and 3.8.4 of the Draft EIR, the orchards in Timber Canyon are a minimum of 2,000 feet west of the entrance to the side canyon containing Toland, a distance sufficient to dampen the small effect of the volume change in the side canyon on micrometeorology in the main canyon orchards.

Heather M. Davis
567 N. Mill Street
Santa Paula, CA 93060

RECEIVED

NOV 6 1995

V. R. S. D.

November 3, 1995
Ventura Regional Sanitation District
Attn: General Manager
1001 Partridge Drive, Suite 150
Ventura, CA 93003

RE: TOLAND LANDFILL - Comments on the DEIR

Dear General Manager,

As a resident of Santa Paula, and therefore a directly affected party in the outcome of the Toland Landfill expansion, I was shocked at the lack of impartiality the Draft Environmental Impact Report exhibited. The Toland Landfill expansion is not the best, nor the most viable project for handling Western Ventura County's municipal waste. At least three significant impacts were recognized in the DEIR (traffic, noise & air quality), and several more impacts were not even addressed; and yet alternatives with less significant impacts (or impacts that could be mitigated within the jurisdiction of the VRSD) were not studied and considered seriously. Isn't the consideration of alternatives a requirement of CEQA. A public agency should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen significant environmental effects of the project (PRC Section 21002).

Wouldn't any of the 17 sites identified as more desirable in your January 1991 study be a better alternative? Since these sites were included in the study, I am assuming that most of them are feasible. Wouldn't a new, lined landfill - that is not in a canyon drainage channel - be a better alternative? Perhaps a better location for a regional landfill would be a site that is not across the street (and uphill) of an historic, operating school house; not in a prosperous agricultural valley; not in a valley with limited wind patterns; and not over the groundwater basin that supplies water for the entire West Ventura County. Please address the alternatives more seriously in the actual EIR. With the very obvious significant impacts of this landfill expansion, I (and several thousand residents of the Santa Clara River Valley) am hard-pressed to believe that expanding the Toland Landfill is the most responsible and least destructive option.

I have included a reprint of a letter I sent to your office prior to the preparation of the DEIR. Please address in the EIR the concerns presented in that letter. Please also address the following concerns in the EIR.

- 1) Traffic - East on Hwy. 126
The expansion of the landfill will bring the Toland/126 intersection down to a failing level F. Although this level is unacceptable, how much worse will conditions be when S.P. Milling adds 190 daily truck trips to the same highway? This impact was considered an "unavoidable adverse impact." Would any of the alternative sites engender more acceptable traffic levels?
- 2) The Santa Clara School House
The children at the Santa Clara Schoolhouse would be suffocated daily by diesel fumes, carbon monoxide and lead particulates from 210 to 400 idling industrial trucks waiting to make a left-hand turn onto Toland Road. What parent (or public agency) would submit their children to such poor air quality? The Toland Landfill expansion will signal the end of the historic schoolhouse. Is this an "unavoidable adverse impact?" Please don't say it is impossible to test the "idling scenario." Try it out for a day or so - 400 fully-loaded trucks depending on the intersection in one standard day. Please have an impartial third party analyze the air quality at the schoolhouse.

3) Slope and Elevation

The Toland Landfill is on a hill, which means that trucks use excess fuel to get the trash up the hill, and the trash, when mobilized through events such as earthquakes, 50 and 100 year floods, or just natural erosion over a few hundred years, will end up on the floor of the Santa Clara River Valley. Are long-term natural processes also "unavoidable adverse impacts?" The landfill is currently situated in a drainage channel that funnels water from the canyons above. Plugging that channel with a 16 million ton landfill will have an adverse impact. A more detailed geologic survey on the slope, the creek, and the potential volume of mud and debris flows should be conducted before the excavation.

4) Landfill Liner

A one-foot layer of clay on the existing landfill will not hinder leachate from getting through to groundwater. The sheer weight of the 16 million ton landfill will push sections of the clay out of the way, allowing for drainage outlets within the landfill. Over time, the clay will dry out and crack, making it an insufficient barrier. As I mentioned in my March 1995 letter, since the landfill will have an estimated capacity of greater than 500,000 tons; plastic, high-capacity landfill liners should be utilized prior to the expansion (preferably beneath a new landfill).

5) Economics

How economically viable will the operation of Toland be if and when Weldon is developed? Although the district has communicated that they can prohibit or limit importing trash, will that resolution still be viable when the west county no longer provides enough waste for the economic operation of the landfill? Has the economic viability of surrounding landfills that operate at below capacity been analyzed? Is the Toland Landfill expansion really necessary?

I have reviewed in this letter only a few of the many obvious, potential adverse impacts this landfill expansion would have. As you know from the comments made at the October 19, 1995 public meeting, there are many issues that the citizens of the Santa Clara River Valley are concerned about. Please do not make the final EIR another marketing document; there are too many serious problems with the Toland Landfill expansion to just write them off as "unavoidable adverse impacts" or "NIMBY" concerns. All we need is a fair, impartial document that honestly looks at all the impacts of the project and compares the project seriously to alternatives. The Toland Landfill expansion can't be the only choice - how could it be?

Thank you,


Heather M. Davis

P.S. Please note, the DEIR's implication that a landfill is needed in West Ventura County is faulty. Many options exist for handling municipal waste; including meeting the mandate of 50% recycling by the year 2000; facilitating the existence of community compost drop-off facilities; improving Ventura County consumer education; and (as a last resort) shipping anything left over to out-of-county landfills that need our garbage for them to run economically. Ventura County does not need another landfill, but as pointed out in a recent Ventura Star article, apparently the Sanitation District looks forward to the landfills providing the bulk of its budget. Perhaps the VRSD should consider more seriously the "no action" alternative; get out of the landfill business. There are plenty of jobs out there that don't involve make-work, unnecessary projects.

Heather M. Davis
567 N. Mill Street
Santa Paula, CA 93060

March 25, 1995

Ventura Regional Sanitation District
Attn: Whitney
1001 Partridge Drive, Suite 150
Ventura, CA 93003

RE: TOLAND LANDFILL - Extended Comments

Dear Whitney,

As a resident of Santa Paula, and therefore a directly affected party in the outcome of the Toland Landfill expansion, I would like to request that the following list of issues and concerns be addressed fully in the Environmental Impact Report.

1) Traffic & Cumulative Impact

The S.P. Milling Company has recently been granted a conditional use permit and is completing an EIR for a large gravel mining operation (Sycamore Ranch Project) a few miles west of Fillmore. This industrial project would operate over a long term period of 30 years. In their conditional use permit, S.P. Milling has estimated a traffic volume of over 190 truck trips per day (ref. CUP #4837, 27,000 trips per year/ 140 days per year).

As required under CEQA Guidelines, Section 15126 and under Public Resource Code Section 21100, please include in the EIR an adequate discussion on the cumulative impacts of the Toland Landfill expansion and the S.P. Milling Company Sycamore Ranch Project. Both these industrial projects will have a significant impact on the four-lane 126 Freeway over a similar timeframe.

2) Air Quality

In addition to a study on the cumulative impact of estimated traffic volume to Toland, S.P. Milling, and the communities of Fillmore and Santa Paula, please include an in-depth study on the fluctuating air patterns within the Santa Clara River Valley. At night-time, in the mornings and during the Santa Anas, wind flows off the desert and through the valley westward towards the ocean. During the day (as the desert heats up), air flows eastward up the valley towards Fillmore and Pto. (This information is common knowledge; call anyone at the Santa Paula Airport). Obviously, living directly downwind of a 16 million ton landfill would not be favorable for anyone.

Santa Paula and Fillmore are low income areas that attract many elderly on fixed incomes, and young families with small children. How will increased inhalable particulates (PM10) caused by the landfill and the bio-control agents commonly sprayed on landfills affect these residents? Also, how will the increased level of ozone, carbon monoxide, nitrogen dioxide and sulfur dioxide emitted cumulatively by the County Sanitation Trucks and the S.P. Milling Trucks affect the health of this vulnerable population? Please include in your EIR a Risk Assessment (with \$ figures) for the proportion of the population affected (including medical expense, relocations/loss of property costs, and cost to surrounding communities that must absorb the displaced population into existing affordable housing) compared to the \$ benefit of expanding the Toland Landfill (if any). Although the valley's prosperous agriculture industry is not a primary health concern under National Ambient Air Quality Standards, please include in your analysis on the impact to air quality the cost to all agriculture within the valley that would be affected by a great cumulative increase in traffic (and associated pollutants) and an increase in particulates from the landfill and toxic bio-control chemicals used at the landfill that diminish non-toxic pest control efforts of farmers.

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3) Economics

I would not like to go into numbers you have heard several times before. However, as I understand, this landfill expansion would not be economically viable unless it look in ten times its present tonnage and closed in 17 years (or 1/5 to 1/3 its estimated present life). The county would need to import trash for a relatively short amount of time (compared to 70 years) and then look for a new viable alternative at a time when alternatives won't be as economically available. Notably, the "opportunity cost" of procrastinating now will include more than finding an expensive alternative 17 years from now; the cost will also include the loss of agriculture, which presently is one of the top grossing industries in our county. Agriculture requires more than just a little space to grow produce; it requires favorable growing conditions. A 16.8 million ton landfill will alter the environment in the Santa Clara River Valley. The valley makes up an intricate ecosystem; air flows up and down the valley, and water is constantly recirculated. The expanded landfill will be a void in the greenbelt and could potentially destroy conditions that make successful agriculture in this valley possible. Will we be ready as a county to absorb the economic loss of agriculture in 17 years? This valley incorporates prime agricultural soil and possesses some of the best growing conditions in the nation. Is this land worth gambling to a 17 year quick-fix?

Please also include in your analysis on the economic impacts of the Landfill Expansion the cost to the communities of Fillmore and Santa Paula in lost tourism. Both communities have worked hard in recent years to make these cities a visitor destination. The old time train running between the two communities is projected to attract visitors from all over Southern California to Ventura County. I doubt these visitor would want to take their children on a train ride to see a "quaint" 16.8 million ton landfill. The Landfill expansion will diminish the economic benefit of the time and monetary investments Santa Paula and Fillmore have made in downtown renovations to make our cities a pleasant place to visit.

4) Water

Please incorporate in your study the type of soil that underlies the existing landfill. If no liners are in place until 500,000 tons have been reached (approx. 1 year @ 1,500 tons/day), what will prevent waste leachate and bio-hazardous "bio-control" agents from leaching into the groundwater? Although liners are not required for landfills that hold less than 500,000 tons, the estimate for a much larger capacity has already been communicated. This estimate should be the number used to establish the necessity of liners prior to the expansion, not after the fact when liners can only be added to the sides of the landfill.

Once again, back to a cost consideration - is the Ventura Regional Sanitation District prepared to pay for improvements in municipal water filtration that would be necessary to handle the new load on downstream Santa Paula Municipal Water caused by a partially unfilled multi-million ton landfill?

In closing, I would like to make an emotional argument against the landfill expansion. I love my home in Santa Paula. As an asthmatic, I resent that the Ventura Sanitation District wants to ruin the air quality in my home and in the homes of so many good people who live in Santa Paula and Fillmore. It seems that since my city does not have the large sums of money necessary to communicate the obvious - that expanding Toland Landfill is not the best alternative to developing the Webbon Canyon Landfill - then for some reason we must settle for every unwanted project the county wants to "dump" somewhere. When Webbon was first under scrutiny, a list of alternatives were printed in the Star Free Press. Toland was one of the least likely alternatives...and yet, now it is the only alternative. Please go back and read those alternatives. Similar to the argument against the Webbon Canyon Landfill, valleys and canyons are bad location choices for landfills due to limited air patterns. The Santa Clara Valley also has agriculture at stake. Don't choke us because we're ten miles out of the way. As so eloquently exclaimed in a favorite Dr. Seuss story, "We're here, We're here!"

Thank you,


Heather M. Davis

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**DOCUMENT 35
HEATHER M. DAVIS
RESPONSE TO COMMENTS**

Response 35-1

1. The alternatives analysis in Chapter 4.0 of the Draft EIR is comprehensive, objective, and meaningful. The Draft EIR evaluated the following 32 alternatives:

<u>Alternative</u>	<u>Number Evaluated</u>
In-County landfills (waste transport by truck)	1
Out-of-County (waste transport by truck)	4
Rail-haul alternatives	4
Offsite alternative location (within County)	20 ⁽¹⁾
Resource Recovery	1
Reduced Project	1
No Project	<u>1</u>
TOTAL	32

2. As shown in the above table, the alternatives analysis included the evaluation of 20 offsite alternatives, including the alternatives previously considered in the VRSD Study referenced in this comment. Potential environmental impacts associated with each of the alternative sites is summarized in Table 4.7 of the Draft EIR. As concluded in Section 4.5.4 of the Draft EIR, none of the alternative in-County sites provide the opportunity to eliminate significant impacts or reduce overall environmental impacts compared to the proposed project.
3. Compared to the proposed project, development of a new landfill at a currently undisturbed location would allow the installation of a composite liner to minimize the potential for water quality impacts. Development would, however, introduce the potential for water quality degradation for both surface water and ground water resources to a new site. Since the proposed project would not have a significant impact on ground water quality, development of a landfill at an offsite location is unlikely to reduce potential environmental impacts to this resource compared to the proposed project.

(1) Comparative impact analysis of top 20 sites identified in previous siting studies (VRSD Siting Study, CoSWMP, and Weldon Canyon EIR).

Response 35-2

1. This comment is incorrect in noting that the expansion of Toland would reduce the Toland Road/Highway 126 intersection to a level of service "F" (LOS "F"). As shown in Table 3.11.10 of the Draft EIR, the existing LOS for the southbound left turn movement at this intersection is already "F" without the proposed project, and the remaining turning movements at this intersection are currently at acceptable service levels and would continue to operate at acceptable levels with or without the proposed project. As discussed in Section 3.11.2.4, the LOS for the left turn movement from Toland Road onto Highway 126 is due to cumulative traffic on Highway 126 which does not provide adequate gaps in traffic for left turns. This situation is not limited to Toland Road and is expected to occur at other roads intersecting with Highway 126 between Santa Paul and Fillmore (e.g., Hall Road, Sycamore Road) that are not affected by the proposed project.
2. As discussed in Section 3.11.4.1 of the Draft EIR, based on Caltrans' projections, traffic on Highway 126 is anticipated to increase by approximately 79 percent by 2015. This growth projection is expected to conservatively represent growth in the adjacent areas as well as increases in through traffic. This conservative projection of an increase of approximately 16,600 average daily trips (ADTs) is more than adequate to address the potential impact of the 190 additional trucks from the proposed S.P. Milling Company's Sycamore Quarry project identified as a concern by this comment.
3. Section 3.11.8 of the Draft EIR acknowledged that nonproject-related cumulative traffic on Highway 126 constitutes a significant impact. The proposed project would represent approximately 2.3 percent of the future ADTs for the "worse case" traffic scenario (i.e., packer trucks to transport waste to Toland) on Highway 126 and 1.2 percent of the ADTs for the "proposed case" traffic scenario (i.e., transfer trucks to transport waste to Toland). Traffic conditions along Highway 126 represent a regional issue.
4. Table 4.7 of the Draft EIR summarizes potential environmental impacts, including traffic-related impacts and conditions, for the offsite alternatives evaluated. As shown, most of the sites would either result in substantial traffic impacts, or require major roadway improvements or new construction. Although it is possible that the traffic-related impacts of one or more of these

alternatives would be less than the traffic impacts associated with the proposed project, none of the offsite alternatives were determined to have the potential to reduce overall environmental impacts compared with the proposed project.

Response 35-3

1. Based on this and other comments, the carbon monoxide (CO) analysis has been revised to include the estimated maximum waiting time for vehicles making the left-turn from Highway 126 onto Toland Road, as well as the estimated maximum waiting times for the other turning movements at this intersection. Under existing conditions, plus the proposed project, a maximum delay of approximately 7 seconds for left turn movements from Highway 126 onto Toland Road is estimated (WPA, 1995). This does not represent a significant increase over the approximately 6-second delay currently experienced by vehicles at this intersection. Under buildout cumulative conditions in 2015, which include all sources of traffic, average delays of 19 seconds are estimated for the left turns from Highway 126 onto Toland Road (WPA, 1995).
2. As shown in Revised Table 3.12.12 (see Section 3.2 of this Final EIR), the maximum CO concentrations associated with the proposed project would be 0.8 and 0.6 parts per million by volume (ppmv) for the 1-hour and 8-hour averaging times, respectively. When added to the background CO concentrations of 5.1 and 2.6 ppmv for the 1-hour and 8-hour average, respectively, the proposed project would not exceed the ambient air quality standard for CO (see Revised Table 3.12.12 of this Final EIR). Therefore, the revision of the CO analysis does not alter the findings or conclusions of the EIR.

Response 35-4

1. Based on the volume of stormwater that could flow from the site during the 100-year, 24-hour storm event, the detention basin would be approximately 250 feet by 150 feet and 10 feet deep. Construction of the detention basin would require a National Pollution Discharge Elimination System Permit (NPDES) from the RWQCB under the Federal Clean Water Act as a point source discharge for stormwater, and would require a building permit from the County Building and Safety Division.
2. The maximum water release rate from the detention basin would be equal to the current stormwater discharge rate from the site for the 100-year, 24-hour storm event. Based on the

preliminary hydrology calculations in Appendix C of the Draft EIR, the current stormwater discharge rate from the site is estimated to be 337 cubic feet per second (cfs). The detained stormwater would be released from the basin via a pipe sized to limit the outflow to a maximum of 337 cfs. As the release of water from the detention basin would be through a pipe sized to a maximum of 337 cfs, there would be no requirement to monitor the outflow volume. The detention time in the basin provides the mechanism through which the sediment in the water settles to the bottom of the basin. Collected sediments would be removed routinely as part of regular maintenance activities at the landfill.

3. Based on the geologic trenching conducted at the site, landslides and mud flows at the site are surficial in nature and are not deep seated (Fugro, 1992; Environmental Solutions, Inc., 1995a). These surficial features would be excavated as part of the proposed project. As Toland is a canyon landfill, infilling the canyon area with waste would buttress the slopes against future failure. The geologic investigations at the site have determined that these existing surficial features would not represent a geologic hazard to the proposed project, nor would the proposed project result in geologic hazards. Since the detailed design of the proposed project has not been completed, however, a mitigation measure was included in Section 3.2.7 of the Draft EIR to require a slope or foundation stability report be prepared for the final design.

Response 35-5

1. The proposed project consists of both a vertical and lateral expansion of Toland. The vertical expansion component of the proposed project includes the placement of additional waste on top of waste already landfilled at the site. Vertical expansions of existing landfills are allowed by state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) without a requirement to excavate previously landfilled waste to allow the installation of a composite liner system. Lateral expansions of existing landfills are required by state and federal regulations to include a composite liner system. Therefore, based on state and federal landfill regulations, the proposed project includes a composite liner for the lateral expansion component of the project.
2. As discussed in Section 2.5.1 of the Draft EIR, for the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot thick low permeability intermediate soil barrier would be installed. Incorporated with the intermediate

soil barrier is a landfill gas collection system, and leachate collection and removal system. The design of the intermediate soil barrier system shall take into account the overburden weight of the new waste and shall account for any settlement that may occur.

3. The intermediate soil barrier to isolate the existing waste from the new waste is not required by state or federal landfill regulations for vertical expansions, however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.
4. In addition, as discussed in Section 3.3 of the Draft EIR, based on the geologic and hydrogeologic conditions at Toland, and the landfill regulatory requirements included in CCR Titles 14 and 23, and Subtitle D (e.g., composite liner system, landfill gas collection system, leachate collection and removal system, etc.) the proposed project would not impact ground water quality.

Response 35-6

1. The staff of VRSD has provided the VRSD Board of Directors with detailed information regarding the economics of the proposed project, including the minimum daily tonnage necessary to make the proposed project economically viable. The Board of Directors will consider this economic information along with the EIR as it makes its decision regarding the proposed project.

Response 35-7

1. The 1,500 tpd estimate for waste which will require disposal from the proposed service area over the life of the proposed project is based on projections included in the Source Reduction and Recycling Elements (SRREs) for the County and its cities served by VRSD. These estimates are based on compliance with AB 939 which mandates a 50 percent reduction in the volume of solid waste being landfilled by 2000. The projections also recognize various resource reduction and recycling activities as noted in this comment.
2. The potential for surrounding landfills to accommodate waste proposed to be disposed at Toland under the proposed project is discussed in the respective sections within Chapter 4.0 of the Draft EIR. The need for landfill capacity in both the short-term and long-term is

documented in the EIR. This finding is confirmed by a recent CIWMB report which lists Ventura County as one of twenty-one counties statewide which has less than 15 years remaining disposal capacity (CIWMB, 1995). In addition, as discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion program implemented under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County has only nine years of remaining landfill capacity (County, 1995a).

3. The environmental effects of "...shipping anything left over to out-of-county landfills..." as suggested in this comment, is addressed in Chapter 4.0 of the Draft EIR. The analysis of out-of-County alternatives includes transport to Los Angeles County landfills (see Section 4.3 of the Draft EIR) by truck, as well as potential out-of-County transport of wastes by rail (see Section 4.4 of the Draft EIR). None of the alternatives were determined to have the potential to eliminate or reduce significant impacts as compared to the proposed project at Toland.

Response 35-8

1. As discussed in Section 3.1.4 of the Draft EIR, based on the County General Plan and the designation of the area between Santa Paula and Fillmore as greenbelt, it is reasonable to assume that these areas would remain primarily open space and agricultural. As discussed in Section 3.11.4.1 of the Draft EIR, an identification of specific projects which would generate future traffic would, therefore, not be meaningful in projecting overall, future Highway 126 traffic in the project vicinity. The analysis, was therefore, based on Caltrans' projection of a 79 percent increase by 2015. This conservative projection of an increase of approximately 16,600 ADTs, more than adequately addresses the potential impact of the 190 additional trucks for the S.P. Milling Company's Sycamore Ranch Project identified as a concern in this comment.

Response 35-9

1. The proposed project would not result in new or additional air pollution-related health stress on senior citizens or other sensitive individuals because the majority of the air emissions related to disposing of solid waste are not changing within the County when landfilling moves from Bailard to Toland.

2. Section 3.12.3 of the Draft EIR provides the discussion of air emissions from the proposed project and the modeling of ambient air concentrations caused by these emissions. The analysis takes into account the wind patterns in the Santa Clara Valley. Table 3.12.10 of the Draft EIR shows that the peak concentration caused by the proposed project plus the background concentration would not exceed state or federal national ambient air quality standards. The ambient air quality standards have been established by the state and federal government at concentrations that protect human health from known effects, and include an adequate margin of safety.
3. Section 3.13 of the Draft EIR provides an additional discussion regarding the health risks of the proposed project's air emissions including criteria pollutants and toxic air contaminants. As can be seen in Table 3.13.2 of the Draft EIR, carcinogenic and non-carcinogenic (chronic and acute health hazards) health risks from the proposed project are orders of magnitude lower than significance thresholds. Thus, even the more susceptible individuals, including senior citizens and young children, would not be subjected to significant health effects from the proposed project.

Response 35-10

1. A health risk analysis conducted for the proposed project was summarized in Section 3.13 of the Draft EIR. The assumptions were selected to overestimate the potential risks. The health risk assessment included:
 - Evaluation of 57 known and suspected toxic air constituents developed in consultation with APCD.
 - An air dispersion modeling analysis in which impacts were calculated for a network of receptors extending 5 kilometers beyond the property boundary.
 - Individual cancer risk, and chronic and acute health hazard indices resulting from exposure were calculated at each receptor and cumulative risk values were also calculated.

As discussed in Section 3.13.3 of the Draft EIR, toxic air emissions associated with operations of the proposed project would not exceed the significance threshold and no significant impacts are expected.

2. With regard to agricultural operations in the vicinity of the site and impacts from PM₁₀, Section 3.8.3.2 of the Draft EIR stated that the proposed project would not increase PM₁₀ concentrations and associated deposition more than a small proportion above its current

background level. Experience at the Spadra and Highgrove landfills indicated that fugitive dust emitted by travel on dirt roads in orchards and other agricultural areas was more of a concern in depositing dust on plants and causing adverse effects (Barnes, 1993).

3. In addition, only a small area of dirt cover borrow material, dirt road, and dirt working area in front of the active face is exposed and subject to wind erosion. These areas are treated (e.g., watered) to minimize fugitive dust emissions. Dirt areas of the landfill that make up the rest of the cover borrow piles, top deck of the landfill, and elsewhere that are not being actively disturbed by equipment are treated with water or chemical dust suppressants to sufficiently eliminate emissions of fugitive dust.
4. In response to this and other comments, the following measures have been included in the EIR to further reduce impacts:
 - Installation of a wheel washing station in which vehicles leaving the landfill active working face would pass through at the "apron," which is the transition section at the end of the paved road where it becomes a dirt road. The wheel washing station would work in conjunction with the mitigation measures included in Section 3.12.7 of the Draft EIR that require the apron to be flushed with water to assure that the tires cannot track out dirt or mud, and that the onsite paved road shall be swept or water flushed. This combination of measures would significantly reduce the amount of dirt vehicle tires would carry onto Toland Road.
 - VRSD shall pave, or pay the cost to pave, unpaved roads in the vicinity of Toland. The linear feet of road to be paved shall be developed in consultation with the APCD and shall be sufficient to offset the PM₁₀ concentrations from project sources (i.e., offsite mobile emissions and onsite emissions). Based on a preliminary analysis, paving approximately 27,500 linear feet (i.e., approximately 5.2 miles) of unpaved roads in the vicinity of Toland would offset the PM₁₀ generated by the "worse case" traffic scenario (i.e., 450 vehicles per day versus the "proposed case" of 210 vehicles per day). The actual linear feet of unpaved road required to be paved to offset the PM₁₀ generated by the proposed project would be based on the number of vehicles traveling to the site on a daily basis.

The inclusion of mitigation measures in the Final EIR to implement the above does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the specific text of the mitigation measures for the proposed project.

5. It is unclear in the comment what is meant by the "toxic bio-control chemicals" that would be used at the landfill. As stated in the Draft EIR, dust control measures would include using water or chemical dust suppressants, neither of which would interfere with the agricultural operations in the vicinity of the site.

Response 35-11

1. As discussed in Section 4.8 of the Draft EIR, tipping fees at Bailard are presently subsidizing Toland operations. Required improvements at Toland to meet state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) that would be required with or without the proposed project could not be amortized based on landfill revenues at the currently permitted 135 tpd disposal rate without the subsidy provided by Bailard. Therefore, for purposes of the EIR, the No Project alternative assumed that Toland would also close in the summer of 1996. Based on the assumption that Toland would close in the summer of 1996, the proposed project does not result in a reduction of waste disposal capacity at Toland for the Santa Clara Valley. In fact, the proposed project would provide waste disposal capacity for Santa Paula and Fillmore and the unincorporated areas of the Santa Clara Valley at Toland for 30 years, as compared to less than a year without the proposed project.
2. As discussed in Section 3.8.3.2.2 of the Draft EIR, the potential impacts of the proposed project on agricultural operations would not be significant. Various mitigation measures are included in the Draft EIR topical sections of Chapter 3.0 of the Draft EIR to assure that these impacts remain below a level of significance.
3. Section 3.9 of the Draft EIR addressed the impacts to the aesthetic character and visual resources within the proposed project site and surrounding area, and discussed the potential aesthetic effects associated with the proposed project. The determination that there would be no significant impacts from the proposed project with regard to visual characteristics was based on the minimal amount of newly disturbed acreage associated with the proposed project, in addition to the project being a continuation of current landfilling activities. The increase in the height of the landfill, was also considered. As demonstrated in Figures 3.9.3 through 3.9.5 of the Draft EIR, the proposed project would not extensively alter the natural appearance of the area. Therefore, impacts are not considered significant.

Response 35-12

1. As discussed in Section 3.3.2.2.1 of the Draft EIR, Toland is overlaid by the Pico Formation, which has been classified as a nonwater bearing unit in several previous studies which include:
 - California Division of Mines and Geology. *Geology and Mineral Deposits of Southwestern Ventura County, Preliminary Report No. 14. 1973.*

- Mann, J. F., Jr. *A Plan for Ground Water Management*, unpublished consultant's report prepared for United Water Conservation District, with 1969 supplement.
- County of Ventura, Public Works Agency, Flood Control and Water Resources Department. *Triennial Report of Hydrogeologic Data, 1977 through 1980*. 1981.

2. See Response 35-5 above regarding the liner requirements for the proposed project.

Response 35-13

1. As discussed in Section 3.3 of the Draft EIR, based on the geologic and hydrogeologic conditions at Toland, and the landfill regulatory requirements included in CCR Titles 14 and 23, and Subtitle D (e.g., composite liner system, landfill gas collection system, leachate collection and removal system, etc.) the proposed project would not impact ground water quality.

Response 35-14

1. The commenter's opposition to the proposed project and concerns as an asthmatic are noted. Although the proposed project would not result in site-specific significant air quality impacts, as noted in Section 3.12.8 of the Draft EIR, offsite mobile emissions associated with the proposed project would constitute a significant air quality impact. In the context of alternative sites as referenced in this comment, these emissions would be less than the mobile emissions associated with existing in-County or out-of-County landfills. Fewer vehicle miles would be traveled to transport waste to Toland than to existing alternatives.
2. As discussed in Response 35-1 above, the alternatives analysis in the Draft EIR is comprehensive, objective, and meaningful. The evaluation included the alternatives which were included in the comprehensive siting studies previously conducted by the County and by VRSD. Since 31 alternatives in addition to the No Project alternative were evaluated in Chapter 4.0 of the Draft EIR, it is most likely that the alternatives referenced in this comment letter as listed in the Star Free Press were reviewed in the Draft EIR.
3. In regards to Toland "...being one of the least likely alternatives..." in previous studies, it is probable that this comment is referencing the VRSD Siting Study (EMCON, 1991). As discussed in Section 4.5.3.3.10 of the Draft EIR, the VRSD Siting Study did not specifically

analyze Toland, but included a site designated as the O'Leary site which encompasses the Toland property. The O'Leary Canyon site (approximately 450 acres) encompasses the majority of the proposed 213-acre project site (see Figure 3.8.7 of the Draft EIR). The project site, however, does not encroach into O'Leary Canyon. The rankings for the O'Leary Canyon are not, therefore, directly transferable to the Toland site. Several natural resources and development constraints occur on the O'Leary Canyon site which do not occur on the Toland site.

4. An explanation of VRSD Study site rankings compared to the objectives and site boundaries of the Toland Road Landfill Expansion is included in Section 3.8.3.1.5 of the Draft EIR. Included as Table 3.8.3 is a ranking of the Toland site based on the 1991 VRSD Study criteria. An overview of each of the sites evaluated in the VRSD Study, including the top ranking sites, is included in Section 4.5.3 of the Draft EIR.
5. Meteorological influences on air quality and the potential effects of the proposed project on surrounding agricultural are addressed in Sections 3.12.2.1 and 3.8.3.2.2 of the Draft EIR, respectively. Included in the agricultural analysis are potential impacts due to changes in the frequency and severity of frosts, the impacts of increased fugitive dust on orchards, and the potential increase in pests. Based on the analysis, the proposed project would not have a significant impact on surrounding farming. Air quality modeling and analyses are necessarily site specific incorporating such factors as receptor distance, wind direction and topography, and wind velocity in regards to several different pollutant types. The generalization that valleys and canyons are "...bad location choices for landfills..." is not accurate, nor can Weldon Canyon conditions be compared directly with Toland. Based on the detailed air quality analysis completed for Toland (see Section 3.2 of the Draft EIR), the proposed project would not result in site-specific air quality impacts.

November 5, 1995

RECEIVED

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V. R. S. D.

Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA. 93003-5562
Attn: General Manager

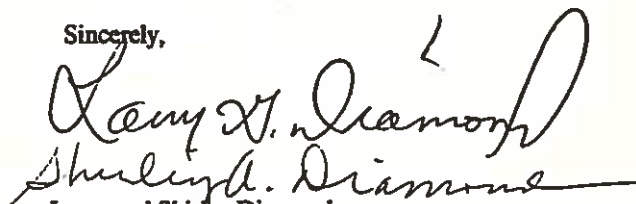
Dear Sir:

My family and I live in Timber Canyon, approximately 2,700 feet due west of the southwest corner of the proposed expansion of the Toland Landfill. I feel our household may be the most affected residence in the area (with the possible exception of the Belden residence). Yet you have not even included our residence on map # 3.8.4 on page 3.8-12 of the DEIR for the landfill. Our home sits at an elevation of 1,300 feet in a saddle that opens up to the landfill due east of our property. When the east wind blows, it comes directly across the canyon where the landfill is located and blows across our home and property. As we drive up the last 400 feet of our driveway we can see the whole operation of the landfill. If the landfill expansion is approved, it will be like looking at an 85 acre construction site with 10 to 14 pieces of heavy equipment working for the next 31 years!

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I strongly believe we will be severely affected by the dust, noise and air pollution from the landfill and ensuing equipment operation. The operation of a landfill of this magnitude will drastically affect the lifestyle that we have worked 25 years to achieve. It is unfair to have a project of this size and type dumped into a prime agricultural area. We are against any expansion of Toland Landfill.

Sincerely,



Larry and Shirley Diamond
4200 Timber Canyon Road
Santa Paula, CA 93060
(805) 525-1219

**DOCUMENT 36
LARRY AND SHIRLEY DIAMOND
RESPONSE TO COMMENTS**

Response 36-1

1. The omission of this commenter's residence is acknowledged. The location of residences on Figure 3.8.4 of the Draft EIR was based on a visual interpretation of a larger scale aerial photograph as to which structures are residences and which are auxiliary agricultural buildings.
2. It is agreed that residences that are most proximate to the landfill would experience the more substantial impacts associated with the proposed project, even though as discussed throughout Chapter 3.0 of the Draft EIR the majority of impacts would be below a level of significance. It is also agreed that the most affected residence would likely be the Belden residence which at its closest point, is located approximately 2,300 feet southwest of the proposed landfill footprint (see Residence 4 on Figure 3.10.1 of the Draft EIR). Based on the environmental impact analyses included in Chapter 3.0 of the Draft EIR, dust, noise, air emission, health risks, and nuisance impacts associated with landfill operations would be below a level of significance at this residence.
3. As shown in Table 3.10.7 of the Draft EIR, the maximum potential noise level due to operations at the Belden residence is projected to be 51.4 dBA, compared to the County General Plan daytime noise standard of 55 dBA.
4. Projected air emissions due to landfill operations, as shown in Table 3.12.2, would not exceed state or federal ambient standards at or beyond the property boundary. The modeling included the primary sources of fugitive dust including waste-hauling trucks on unpaved roads and heavy duty earth moving equipment at the landfill.
5. As the landfill is currently visible from the commenter's residence, it would continue to be visible under the proposed project. As discussed in Section 2.2.2 of the Draft EIR, development of the landfill would be phased, however, and the visual impact would consist only of portions of the site during any one phase. As shown on Figure 2.6 of the Draft EIR, some portions of the phases would occur in areas which would not be visible from the southwesterly location of the commenter's residence, therefore, it would not "...be like

looking at an 85 acre construction site for 31 years." As shown in Table 2.1, disturbance for the expanded portion of the footprint would consist of an additional 33 acres (the existing, approved footprint is 53 acres). The daily working face would be approximately 100-feet wide.

6. The visual impacts of landfill equipment are also overstated in this comment. Although up to 14 pieces of heavy equipment would be associated with the landfill operation, a portion of the vehicles shown on Table 2.5 of the Draft EIR are for backup in case of equipment failure.

**PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND
CLOSURE/POSTCLOSURE**

RECEIVED

NOV 6 1995

Submit to VRSD representative at the Public Meeting, or mail or hand deliver to: Ventura Regional Sanitation District, Attention: District Manager, 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or hand delivered comments must be received at the above address by 5:00 p.m. on Monday, November 6, 1995.

V.R.S.D.

I am a school board member at Santa Clara Elementary School near Toland Road. The expansion of Toland Landfill would add to the noise, traffic, litter and both air and water pollution at the school. The steep downgrade of Toland Road and the additional trucks on the highway would make it extremely dangerous to pull in and out of the school driveway. We have no school bus so the parents of approximately 34 students drive to and from the school on the highway at least twice each day. Our school is a County Historical Landmark. Please don't jeopardize its pristine beauty or the safety of our area children and their parents by expanding Toland Landfill.

①

Submitted By: Shirley A. Diamond
Name (please print)
4200 Timber Canyon Rd.
Street Address
Santa Paula, CA 93060
City State Zip
(805) 525-1219

95-105 (10/16/95/pm)

**DOCUMENT 37
SHIRLEY A. DIAMOND
RESPONSE TO COMMENTS**

Response 37-1

1. The commenter's opposition to the proposed project is noted. The potential impacts with regard to air quality, water quality, noise, traffic and litter associated with Toland were evaluated in detail in the Draft EIR (see Sections 3.12, 3.3, 3.10, 3.11, and 3.14, respectively). The potential impacts to the historical significance of Santa Clara School were discussed in Section 3.6 of the Draft EIR.

2. Neither Caltrans or the County Transportation Department identified hazardous conditions at the Toland Road/Highway 126 intersection. As discussed in Section 3.11.3.1.3 of the Draft EIR, the accident rate along Highway 126 in the vicinity of Toland Road is substantially lower than the statewide average. The flashing beacon and warning signs, as recommended by Caltrans and included in the EIR as mitigation measures, would mitigate potential traffic-related safety issues at the intersection.

38
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Nov 3 1995

**PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND
CLOSURE/POSTCLOSURE**

V. R. S. D.

Submit to VRSD representative at the Public Meeting, or mail or hand deliver to: Ventura Regional Sanitation District, Attention: District Manager, 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or hand delivered comments must be received at the above address by 5:00 p.m.

on Monday, November 6, 1995. I am strongly opposed to expansion of the Toland Road Landfill. Highway 126 east of Santa Paula has a long history of being one of the most dangerous highways in this state. By personal experience, I can testify to this in two different ways.

As the only orthopedic surgeon in this valley for 9 years, one of only 2 for an additional 6 1/2 yrs, I treated an enormous number of people injured on 126. Previous to moving here in 1974, I was an orthopedist for 21 yrs. In Seattle's largest pre-paid medical group, and thus I was handling all injuries for on the average the equivalent of a 35 to 40 thousand population area (larger than Santa Paula & Fillmore combined.) The number of automobiles injured seems severe enough for an orthopedist to be called in to treat them, was consistently much heavier here, and also were often more severe here, than it has been in the Seattle pre-paid group. Many here were injured when a vehicle suddenly crossed over the median line from the direction of traffic to the opposite. I myself almost became a highway 126 statistic when, while driving east on 126, a vehicle suddenly crossed the median, coming right at me. Barely got out of the way. If there had been a car in front of me at the time, it would not have been possible to do that.

The addition of extra lanes in some areas has probably cut down on this major problem, but the addition of 2nd to 4th dump trucks daily will totally change that back to our original problem. In addition it probably will make it much worse than it ever was before. It will essentially change us back to a 2 lane road, and perhaps worse. There undoubtedly will be a long backlog of trucks wanting to get into the toll lane, and prior to that a back log of trucks waiting to change from the slower outer lane to the faster inner lane. Thus, there will be a greater likelihood of an frustrated driver crossing the median line, or of one simply hitting a vehicle in front of them.

Trygve Forland MD

Submitted By: TRYGVE I. FORLAND, M.D.

Name (please print) 1332 WOODLAND DR.

Street Address SANTA PAULA, CA 93060-1259

City State Zip

(over)

38

ADDITIONAL:
THE PROPOSED INCREASE IN BUCKERD'S TRAFFIC ON 126 THRU THE ORCHARD AREAS EAST OF SANTA PAULA WILL CAUSE A TREMENDOUS INCREASE IN DUST. THE LATTER WILL CAUSE PROBLEMS ON THE LEAVES OF THE FRUIT TREES, AND THUS SIGNIFICANTLY CUT DOWN ON FRUIT PRODUCTION (A MAJOR VENTURA COUNTY ECONOMIC RESOURCE), THUS HURTING THE COUNTY ECONOMY.

IT WILL NOT ONLY AFFECT THE RANCH OWNERS, BUT IN TURN WILL AFFECT THE RANCH WORKERS, BUT BACKING HOUSE WORKERS, AND THEN SECONDARILY THE BUSINESSES OF THE ENTIRE COUNTY.

THERE ARE MORE ISOLATED CANYONS THAT WOULD BE BETTER SUITED FOR A DUMP AREA, AND ADDITIONALLY WOULD BE ACCESSIBLE BY FREEWAY AND/OR LIGHTLY TRAVELLED SECONDARY ROADS.

Trygve Forland

TRYGVE I. FORLAND, M.D.
1332 WOODLAND DR.
SANTA PAULA, CA 93060-1259

**DOCUMENT 38
TRYGVE FORLAND, M.D.
RESPONSE TO COMMENTS**

Response 38-1

1. The commenter's opposition to the proposed project is noted. Safety issues associated with Highway 126 are discussed in Section 3.11.2.5 of the Draft EIR. Based on records from Caltrans, the accident rate along Highway 126 in the vicinity of the proposed project site is substantially lower than the statewide average. This information is depicted in Figure 3.11.4 of the Draft EIR. The highway is a four-lane divided roadway in the vicinity of Toland. Higher accident rates occur east of the project site, particularly east of Fillmore where the highway is only two lanes (with periodic passing lanes). It is this two-lane section of the highway that has the highest potential for severe accidents and the increased potential for head-on collisions.

2. The proposed project would not generate additional waste truck traffic east of Toland Road. The number of vehicles transporting waste from the Santa Clara Valley (Santa Paula, Fillmore, the community of Piru and other unincorporated areas) is expected to continue to be at a maximum of approximately 70 per day. Since the proposed project would not contribute to additional traffic east of Toland Road, it is not anticipated to appreciably increase the accident risk along Highway 126 east of Toland Road. In addition, because the proposed project would represent approximately 2.3 percent of the future average daily trips (ADTs) for the "worse case" traffic scenario (i.e., packer trucks to transport waste to Toland) on Highway 126 and 1.2 percent of the ADTs for the "proposed case" traffic scenario (i.e., transfer trucks to transport waste to Toland), the proposed project is not anticipated to appreciably increase the accident risk along Highway 126.

3. This comment also expressed a concern regarding the potential for vehicle stacking at the left turn for Toland Road and the movement of waste trucks into the fast lane of Highway 126 to make this movement. As discussed in Section 3.11.3.1.2 of the Draft EIR, the existing 120-foot, left-turn pocket for eastbound traffic on Highway 126 at Toland Road exceeds the minimum length required pursuant to the Caltrans Highway Design Manual (Caltrans, 1995). The Caltrans design standard for left-turn vehicle storage is based on the number of turning vehicles likely to arrive in an average two minute period during the peak hour (Caltrans, 1995). If the number of trucks during the peak hour represent 10 percent or more of the traffic volume, left-turn vehicle storage space for a minimum of one passenger car and one

truck should be provided. As shown in Table 3.11.2, trucks average approximately 11.5 percent of the traffic at the Toland Road/Highway 126 intersection. Based on the peak hour estimate for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The design standard for the left-turn vehicle storage length would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car).

4. Under the "proposed case" and the use of transfer trucks, during the peak hour a waste truck would arrive at the intersection an average of once every 10 minutes. Based on the longer truck length for transfer vehicles, the required left-turn storage length for the "proposed case" would be 85 feet (60 feet per transfer truck and 25 feet for the passenger car). Based on the Caltrans design standard, therefore, depending on whether packer trucks or transfer trucks are used, the required left-turn pocket length at the intersection of Toland Road and Highway 126 would range between 65 feet and 85 feet. The existing 120-foot left-turn pocket and configuration at this intersection and approach lanes, as shown in Figure 3.11.3 of the Draft EIR, provides waste trucks and other vehicles adequate distance to safely approach the intersection.

Response 38-2

1. Section 3.11.4.1 of the Draft EIR discussed the peak traffic volume on Highway 126 for 2015 in which even the "worse case" 450 vehicles per day traveling to the landfill under the proposed project would account for 2.3 percent of the total 37,600 average daily trips. The County APCD provides an emission factor for fugitive dust emitted by travel on paved roads in terms of pounds (0.0062) per vehicle mile traveled. Based on this emission factor, the contribution of project-related traffic to the dust that is deposited in orchards along Highway 126 would also be 2.3 percent. The project-related contribution decreases to 1.2 percent if the landfill traffic is the "proposed case" of 210 vehicles per day.

Response 38-3

1. Chapter 4.5 of the Draft EIR includes a review of 20 alternative offsite locations within the County for the potential development of a new landfill. The evaluation included sites previously identified in comprehensive landfill siting studies conducted by the County and VRSD. As suggested by this comment, several of the sites are relatively isolated canyons. None of the sites, however, would be easily accessed from a freeway (see Figure 4.4 of the

Draft EIR). Potential environmental impacts associated with each of the alternative sites is summarized in Table 4.7 of the Draft EIR. As concluded in Section 4.5.4, none of the alternative in-county sites provide the opportunity to eliminate significant impacts or reduce overall environmental impacts compared to the proposed project.

**PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND
CLOSURE/POSTCLOSURE**

Submit to VRSD representative at the Public Meeting, or mail or hand deliver to: Ventura Regional Sanitation District, Attention: District Manager, 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or hand delivered comments must be received at the above address by 5:00 p.m. on Monday, November 6, 1995.

(1) Regarding "Significant Impacts" per table provided. NOISE, TRAFFIC + AIR QUALITY ARE, AT minimum, "Significant". This significant impact, impacts who exactly and what type of compensation is incorporated into this plan accordingly?

1

(2) Regarding 'NOISE' WHAT IS "difference" is noted during the early AM hours (obviously, the greater impact)?

2

(3) WHAT IS THE 100 year plan, After 70 years?

3

Submitted By: James Heighton
Name (please print)
1221 Boosey Rd.
Street Address
Santa Paula, CA 93060
City State Zip

**DOCUMENT 39
JAMES HEIGHTON
RESPONSE TO COMMENTS**

Response 39-1

1. The comment is correct in noting that the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

2. CEQA provides authority to approve a project which may result in significant unavoidable environmental effects. In accordance with Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impacts.

Response 39-2

1. The noise standard within the County General Plan that applies to the proposed project is as follows:
 - 1-hour Leq (equivalent noise level) of 55 dBA, or ambient noise level plus 3 dBA (whichever is greater) during any hour between 6:00 a.m. and 7:00 p.m.

2. As detailed in the noise analyses included in Section 3.10 of the Draft EIR, onsite landfill operations would not exceed the County General Plan noise standard at the closest residences to the site. The noise analysis was based on conservative conditions which may occur during early morning hours (i.e., from 6:00 a.m. to 7:00 a.m.). The highest noise levels for operations at the working face of the landfill would be associated with the maximum pieces of equipment operating at any one time. As discussed in Section 3.10.3.2, of the Draft EIR,

future noise levels at the working face of the landfill were based on actual measurements at Bailard which is currently accepting approximately 1,200 tpd of waste, the maximum rate for the proposed project.

3. The increase in noise is dependent on the location of the receptor. The existing, measured Leq noise level at 100 feet from the working face of the landfill was 67 dBA. The projected noise level for the proposed project, 71.4 dBA, was based on measurements at 200 feet. The projected noise levels for different locations and receptors are included in Section 3.10.3.2 of the Draft EIR. As shown in Table 3.10.7 of the Draft EIR, at the closest residences to Toland, the project noise levels from the onsite operations associated with the proposed project would be below the County General Plan noise standard of 55 dBA.
4. Estimates for traffic noise are based in terms of Community Noise Equivalent Level (CNEL) and computed using the Highway Noise Model published by the Federal Highway Administration (FHWA, 1978). As discussed in Section 3.10.1.1 of the Draft EIR, the CNEL scale represents a time-weighted 24-hour average noise level. The noise level increase due to offsite, project-related traffic is quantified in Table 3.10.8 of the Draft EIR. As shown, the noise increase due to the proposed project on Toland Road would be 3.5 dBA under the "proposed case," and 7.1 dBA under the "worse case" traffic scenarios, respectively. The maximum, project-related noise increase on Highway 126 would be 0.6 dBA ("worse case" west of Toland Road). As discussed in Section 3.10.7 of the Draft EIR, a mitigation measure is included in the Draft EIR for the construction of noise barriers for the two residences located on Toland Road to reduce this impact to below a level of significance.

Response 39-3

1. It is unclear what the comment is asking with regard to "the 100-year plan, after 20 years." Therefore, no response is possible.

RECEIVED

John V. Hogan
PO Box 291
Santa Paula, CA 93061

NOV 3 1995

V. R. S. D.

1 Nov 95

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

RE: Page 3.14-4 "Airports"
Toland Road Landfill Expansion
Draft Environmental Impact Report (DEIR)

Ladies and Gentleman:

The DEIR in question does not address several key aspects of the bird vs. aircraft problem.

The standard piston powered aircraft east/west routing in the Santa Clara River Valley is along the River/Highway 126. The published traffic pattern (copy enclosed) for Runway 22 at Santa Paula Airport (SZP) requires the aircraft to be slightly north of Highway 126 at 1500' above sea level (MSL) as the aircraft overfly the City of Santa Paula. To position most present day piston powered aircraft for this traffic pattern entry would require the pilot to be below 2,000' MSL and near the intersection of Highway 126 and Toland Road. The entire traffic pattern will be in direct conflict with birds traveling to/from the landfill.

In addition the Federal Aviation Agency (FAA) has approved an "Aerobic Competition/Practice Box" the north/western portion of which lies directly over the Toland Landfill. This "Aerobic Competition/Practice Box" is utilized daily from sunrise to sunset. A copy of this "FAA Special Provision" and a map of the area is enclosed.

The potential for substantial numbers of birds being attracted to the Toland Road area seems obvious. Of equal concern is the attraction of the area of the airport itself. Quoting from the Weidon Canyon Landfill EIR 7-45

"b. Gulls. Land fills represent a potentially attractive food source for gulls and other species of birds The behavioral habits of gulls include daily visits to fresh water for drinking and bathing, and congregating in large groups after feeding to rest and preen."

2555

Weidon Canyon EIR 9-5

"e. Gulls. The gulls tend to converge in the late afternoon on communal roosting grounds such as sand/mud flats, piers, or rooftops. The preferred habitat for roosting and preening gulls includes areas with large expanses of open space adjacent to fresh water where birds can congregate."

The Santa Clara River defines the southern edge of SZP. The fresh water in that River will attract gulls within yards of the runway. In addition the open areas associated with the runway/taxiway will be natural roosting sites. The potential for bird strikes will increase immeasurably by this proposed expansion and no amount of mitigation measures will offset this danger.

Suggested sources of additional information concerning the bird strike danger should include

Bob Phelps
Safety Committee Chairman
Santa Paula Airport
PO Box 308
Santa Paula, CA 93061-0308

Jim Ford
Van Nuys Flight Standards District Office
Federal Aviation Administration
16501 Sherman Way, Suite #330
Van Nuys, CA 91406

Sincerely,

John V. Hogan

Enclosures

16501 Sherman Way, Suite #230
Van Nuys, CA 91406
(818) 904-4221
FAX: (818) 786-9732

Van Nuys Flight Standards District Office
Western-Pacific Region

U.S. Department
of Transportation
Federal Aviation
Administration

June 1, 1995

C.P. AVIATION, INC
ATTN: CLAY PHELPS
830 EAST SANTA MARIA STREET
SANTA PAULA, CA 93080

Dear Mr. Phelps:

**SUBJECT: FAA SPECIAL PROVISION FOR THE AEROBATIC COMPETITION/PRACTICE
BOX FOR THE SANTA PAULA, CALIFORNIA AREA**

This notice is written notification that it is no longer necessary to notify Hawthorne Flight Service Station as specified in your Special Provisions when commencing aerobatic flight operations. The Airport/Facility Directory has a written Notice to Airman (NOTAM) in the Special Notices Section close to the back of the Guide which is stated as follows:

AEROBATIC OPERATIONS, EAST OF SANTA PAULA, CA

PRACTICE AND COMPETITIVE AEROBATIC MANEUVERS ARE REGULARLY SCHEDULED IN THE VICINITY OF THE FILLMORE VORTAC, SUNRISE TO SUNSET, FROM 1,500' AGL TO 6,500' MSL. AEROBATIC AREA IS DEFINED BY THE FOLLOWING FIXED RADIAL DISTANCES: FIMZ20004 THROUGH FIMZ60008 THROUGH FIMZ65009 THROUGH FIMZ66005 THROUGH FIMZ65014 THROUGH FIMZ65014 THROUGH FIMZ70013 AND ON THE FIMZ47013 WITHIN A 3 NM RADIUS.

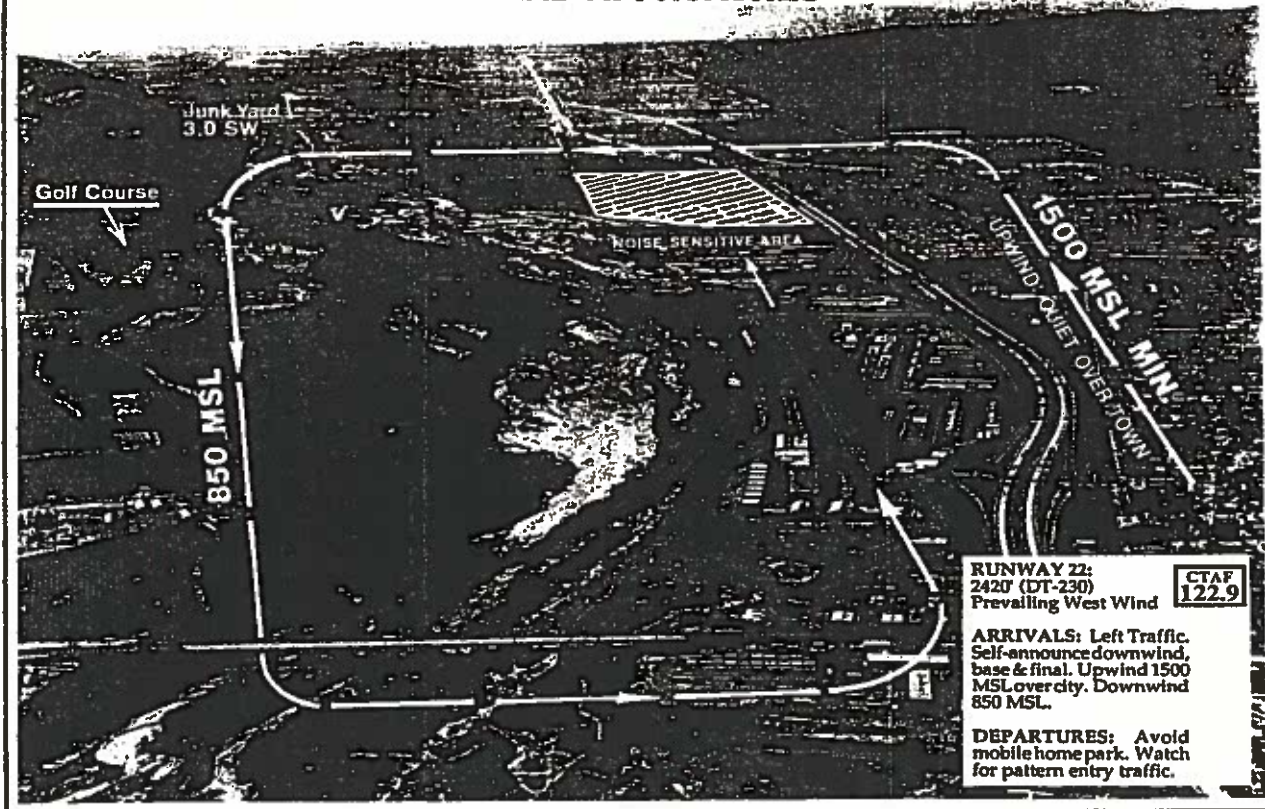
This written notice provides for the FAA required safety notification and information to alert the flying public to the Aerobatic Box. The office is enclosing an amended Special Provisions with the deletion of said provision.

Sincerely,

KARLA J. WATTIER
Aviation Safety Inspector (Operations)

Enclosures
Certificate of Waiver or Authorization
Special Provisions

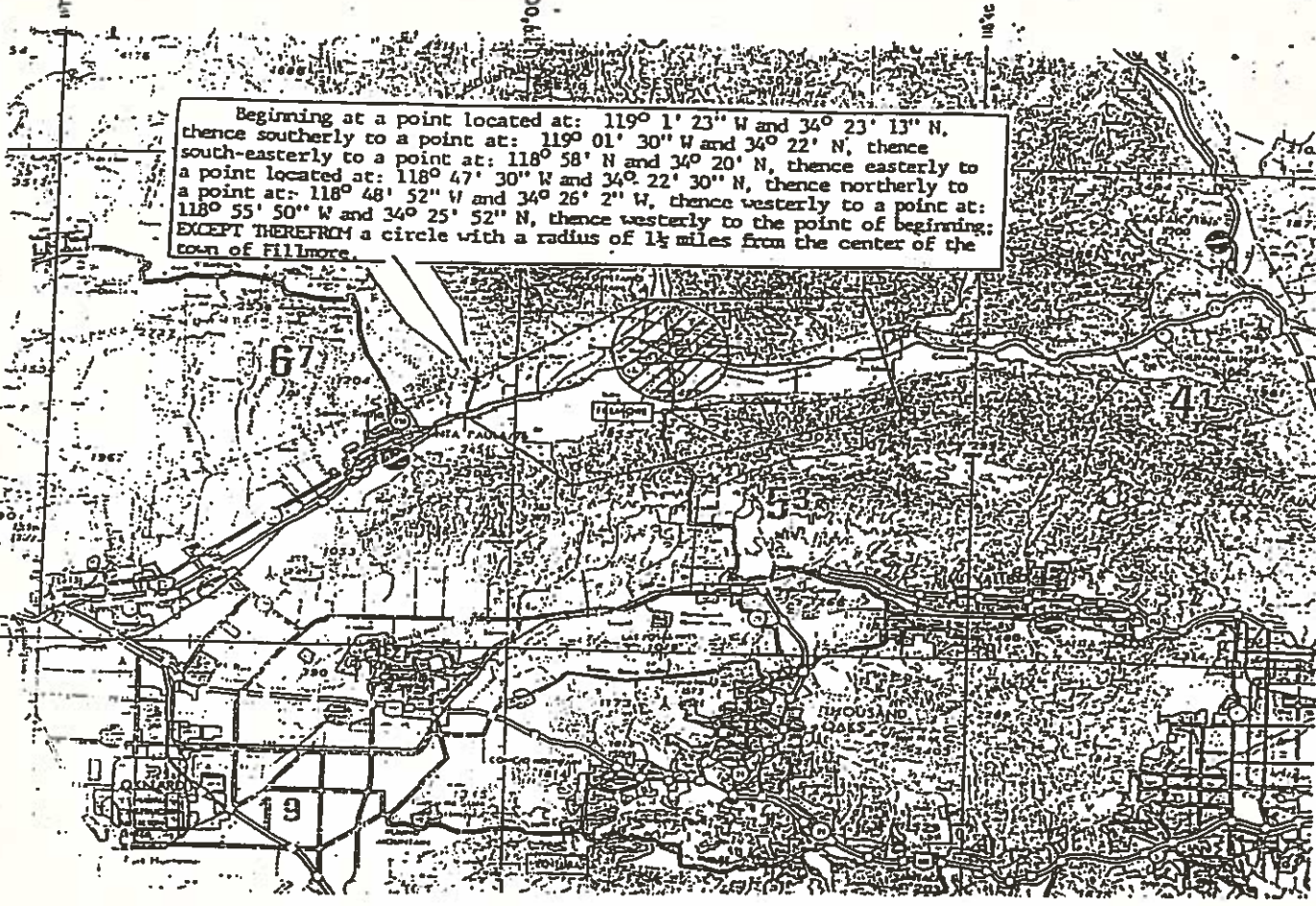
NO OVERHEAD APPROACHES



RUNWAY 22: LEFT-HAND PATTERN PREVAILING WEST WIND

40

Beginning at a point located at: $119^{\circ} 1' 23''$ W and $34^{\circ} 23' 13''$ N, thence southerly to a point at: $119^{\circ} 01' 30''$ W and $34^{\circ} 22' N$, thence south-easterly to a point at: $118^{\circ} 58' N$ and $34^{\circ} 20' N$, thence easterly to a point located at: $118^{\circ} 47' 30''$ W and $34^{\circ} 22' 30''$ N, thence northerly to a point at: $118^{\circ} 48' 52''$ W and $34^{\circ} 26' 2''$ W, thence westerly to a point at: $118^{\circ} 55' 50''$ W and $34^{\circ} 25' 52''$ N, thence westerly to the point of beginning; EXCEPT THEREFROM a circle with a radius of $1\frac{1}{2}$ miles from the center of the town of Fillmore.



40



Beginning at a point located at: $119^{\circ} 1' 23''$ W and $34^{\circ} 23' 13''$ N, thence southerly to a point at: $119^{\circ} 01' 30''$ W and $34^{\circ} 22' N$, thence south-easterly to a point at: $118^{\circ} 58' N$ and $34^{\circ} 20' N$, thence easterly to a point located at: $118^{\circ} 47' 30''$ W and $34^{\circ} 22' 30''$ N, thence northerly to a point at: $118^{\circ} 48' 52''$ W and $34^{\circ} 26' 2''$ W, thence westerly to a point at: $118^{\circ} 55' 50''$ W and $34^{\circ} 25' 52''$ N, thence westerly to the point of beginning; EXCEPT THEREFROM a circle with a radius of $1\frac{1}{2}$ miles from the center of the town of Fillmore.

**DOCUMENT 40
JOHN V. HOGAN
RESPONSE TO COMMENTS**

Response 40-1

1. Toland does not currently attract birds and is not used as a loafing area by gulls. It is speculative as to whether gulls or other bird species would be attracted to Toland due to the proposed project. Similarly, it is speculative as to whether gulls would come in conflict with the Santa Paula Airport. Issues that are speculative cannot be evaluated, therefore, the possibility that Toland may attract gulls or other bird species and the potential that gulls could come in conflict with the Santa Paula Airport is not addressed in the EIR. As discussed in Section 3.14.3.1.1 of the Draft EIR, however, Toland would be operated in compliance with CCR Title 14, including the following operational procedures (see Section 3.14.5 of the Draft EIR) that are known to be effective in minimizing birds at landfills:
 - Compaction of waste at the active working face.
 - Periodic 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.
 - The working face would be kept as small as safely practicable, given the type of and number of landfill equipment working there.
 - An active litter control program.

2. As discussed in Section 3.14.3.1.1 of the Draft EIR, in the event birds are determined to be a nuisance at Toland additional measures would be implemented and may include, but not be limited to, the use of an overhead nylon line grid system (bird wires), distress tapes, propane cannons, and/or habitat manipulation/modification. The effectiveness of these measures would be monitored and, if found not to be effective, additional measures would be developed. To formalize this requirement, a mitigation measure has been included in this Final EIR regarding the use of additional measures in the event birds are determined to be a nuisance at Toland. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

3. As noted in this comment, aircraft landing at the Santa Paula Airport would be at an elevation of approximately 2,000 feet above mean sea level as they cross just north of the intersection of Highway 126 and Toland Road. At this point, aircraft would be approximately 1.5 to 2 miles south of the landfill and approximately 1,400 feet above ground elevation. Gulls normally fly

just several hundred feet (usually less than 500 feet) above the ground surface, therefore, if gulls are flying in this area, there would be approximately 900 feet of vertical separation between aircraft and gulls.

4. Regarding the "Aerobic Competition/Practice Box" established by the FAA, this "box" is on the extreme northwest corner of the landfill, not directly over the landfill as suggested by this comment. As noted in the FAA letter attached to this comment, aerobatics are allowed in this "box" from an elevation of 1,500 feet above ground level (agl) to 5,500 feet above mean sea level. As discussed above, gulls usually fly less than 500 feet above ground elevation, therefore, if gulls are flying in the area of the aerobic "box," there would be approximately a 1,000-foot vertical separation between the lowest allowed aircraft flying elevation in the "box" and gulls. As part of the permitting process, VRSD will coordinate with the FAA regarding the Santa Paula Airport.
5. Regarding this comment's concern that gulls may be attracted to the area of the airport because of the water in the Santa Clara River and the open areas associated with the runway/taxi-way. This situation may occur with or without the proposed project.

RECEIVED
OCT 26 1995
V. R. S. D.

**PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND
CLOSURE/POSTCLOSURE**

Submit to VRSD representative at the Public Meeting, or mail or hand deliver to: Ventura Regional Sanitation District, Attention: District Manager, 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or hand delivered comments must be received at the above address by 5:00 p.m. on Monday, November 6, 1995.

I attended the Oct. 19 meeting at the Community Center in Santa Paula to learn more about the EIR for the proposed Toland project. I went with some questions and some convictions that this project is not a good idea.


From those presenting their objections my convictions were reinforced.

Please listen to the well-founded objections of these local citizens, officials, ranchers, homeowners, and others, young and old, from old families in the Fillmore-Santa Paula area and from newcomers. They speak from knowledge and conviction. I trust their knowledge and concern and their motives. They represent not only their own interests but those of the community and the county.

In addition to the deficiencies of the EIR:

- ...We don't need this landfill. See John Melton's testimony and the letter of Kathy L. Long in The Santa Paula Times Opinion page October 20.
- ...An expanded landfill at Toland would be a disincentive to the growing recycling and waste reduction movement
- ...It would allow the import of trash from out of the county ("trash processed in the county") to "fill the quota."

I trust that the Board of Supervisors will be unanimous in disapproving the Toland Land Fill Project.


Molly S. King
1328 Forest Dr.
Santa Paula, CA 93060

copies to SP Times and to each Supervisor
copy to Arnold Dowdy

**DOCUMENT 41
MOLLY S. KING
RESPONSE TO COMMENTS**

Response 41-1

1. The commenter's opposition to the proposed project is noted. Please refer to the respective responses to Kathy L. Long's comment letter (see Document 46 of this Final EIR), and John Melton's testimony (see Document 61 of this Final EIR) for issues raised by these individuals.

2. The proposed project would not be a disincentive to the growing recycling and waste reduction movement. As discussed in Section 1.2.2 of the Draft EIR, even with full implementation of AB 939's mandated diversion programs and achievement of a 50 percent reduction in waste requiring landfilling by 2000, the California legislature has recognized that additional landfill capacity would be required. The estimated 1,500 tpd of waste to be disposed at Toland under the proposed project is based on waste disposal projections included in the Source Reduction and Recycling Elements (SRREs) for the County and its cities served by VRSD. These SRREs assume full compliance with AB 939 and 50 percent diversion by 2000. Therefore, even with AB 939, 50 percent of the solid waste generated in the County will still require landfilling. As discussed in Section 4.6 of the Draft EIR, achievement of a waste diversion rate that exceeds the 50 percent diversion required by AB 939 is speculative and not reasonably foreseeable. The availability of waste disposal capacity does not relieve local jurisdictions from their responsibility for waste reduction as required by AB 939, and does not create a disincentive for recycling and waste reduction efforts.

3. As discussed in Section 1.2.1 of the Draft EIR, it is proposed that Toland would only accept waste generated in the County or waste from transfer stations/materials recovery facilities located in the County. As discussed above, the projections for landfill capacity needs are based on the SRREs of the local jurisdictions. Contrary to the implication of this comment, the projected daily capacity of 1,500 tpd does not include disposal of "...trash processed in the County..." but originating out-of-County to "...fill a quota."

RECEIVED

2866 Hickory Wood Lane #17
Thousand Oaks, CA 91362
November 6, 1995

NOV 6 1995

V. R. S. D.

General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003-5562

Subject: Draft Environmental Impact Report (EIR) on the Toland Road Landfill Expansion and Landfill Closure/Postclosure.
Ventura Regional Sanitation District Dated September 1995.

Dear General Manager:

I have read the subject EIR in its entirety and the following comments, questions and recommendations represent my own evaluations as a concerned citizen and not those of any collected body of persons residing in Ventura County. The Chapter page, paragraph and sub paragraph numbers are those of the EIR itself.

I consider the Toland Landfill the environmentally superior approach provided the (3) significant conditions are mitigated that are addressed in the following paragraph as they are not in my estimation adequately mitigated in the EIR. I would support the project if these conditions could be alleviated by my recommendations or any other reasonable alternative.

Impacts and Proposed Mitigation Measures. The report admits the stated measures will NOT reduce the impact of the project to below a level of significance in these areas.

- *) Cumulative traffic impacts at the intersection of Toland Road and Highway 126.
- *) Cumulative noise impacts at the Santa Clara School.
- *) Project related and cumulative regional air quality impacts associated with offsite mobile emissions (Chapter 1 - page 10, paragraph 1.3.2.2).

Comments on the first item. "Traffic at the intersection of Toland Road and Highway 126.

"The level of service (LOS) if not mitigated will be decreased from E to F." (Chapter 3.8 - page 26, paragraph 3.8.3.2 Land Use Compatibility, sub paragraph 3.8.3.2.1 General, Residential Uses, item 3.) "This is below the Congestion Management Agency Plan passed in June 1990 as Proposition 111". (Chapter 3.11 - page 3, paragraph 3.11 Transportation and Circulation, sub-paragraph 3.11.1

1

Ventura Regional Sanitation District, November 6, 1995

Applicable Standards, item 3.) "Intersection Analysis for Existing Conditions. Southbound Traffic on Toland Road making a left turn on Highway 126 during the peak afternoon hours degrades the LOS to F". (Chapter 3.11 - page 11, table 3.11.3). This will only be aggravated by the project expansion. Note, the existing conditions are also in violation of Proposition 111. "Under the signalized condition, the intersection would operate at LOS "A" for each of the peak hours evaluated". (Chapter 3.11.4 Cumulative Impacts - page 30, item 6).

1

Recommendation: This intersection warrants a signal during landfill operating hours that can be switched to a steady green light for east/west traffic on Highway 126 for the balance of the 24 hours in a day.

"There is the potential for an increase in accidents and an increased risk of runaway trucks on southbound Toland Road. It was noted that there has been one fatal accident at the intersection due to truck brake failure along the Toland Road downgrade. A concern for student safety at the Santa Clara School was raised". (Chapter 3.11.2.5 Traffic Safety Considerations - page 14, item 1).

"Santa Clara School is located approximately 300 feet west of Toland Road/Highway 126 intersection". (Chapter 3.11 - page 24, paragraph 3.11.3.1.2, item 3).

"The school is located at 20030 East Telegraph Road (Highway 126) and currently serves 34 students and two teachers". (Chapter 3.5 - page 5, paragraph 3.5.2.2.4 Santa Clara Elementary School District item 1).

2

"The school is in session weekdays between the hours of 8:15 am and 2:45 pm" (Chapter 3.8 - page 13, paragraph 3.8.2.2.1 Santa Clara School item 1).

It is possible a runaway truck southbound on Toland road could try to make a right turn onto Highway 126 westbound, not make it totally and crash into oncoming traffic or proceed in the school grounds.

"Intersection traffic operation. The existing left turn pocket length is about 120 feet". (Chapter 3.11 -page 22, Intersection paragraph 3.11.3.12 Traffic Operation, item 1).

This is the approximate length of two large trucks proceeding to the landfill with the school only an additional 180 feet further west on Highway 126. This is a serious highway traffic risk during peak landfill hours and must be mitigated.

Comments on the third item. "Air quality impact associated with offsite mobile emissions". (Chapter 1 - page 10, paragraph 1.3.2.2).

"Offsite vehicle emissions related to the landfill would not significantly impact the school". (Chapter 3.8 - page 28, paragraph 3.8.3.2 Land Use Compatibility, sub paragraph Santa Clara School item 1).

"The County is designated by the Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) as in non attainment status for both ozone (O3) and particulate matter no larger than 10 microns (PM10)". (Chapter 3.12 - page 12, paragraph 3.12.2.2 Air Quality Attainment Status, item 2).

"Because Ventura County is in non attainment status for O3 and PM10, the proposed project will be a significant regional impact". (Chapter 3.12 - page 30, paragraph 3.12.3.2.2 Offsite Mobile Emissions item 4).

"Offsite mobile emissions of the proposed expansion may be potentially reduced by the purchase of mobile emission and remove them from service, thereby reducing overall emissions in the County". (Chapter 3.12 - page 40, paragraph 3.12.7 Mitigation Measures, item 2).

"This mitigation measure may not reduce the emissions below a level of significance". (Chapter 3.12 - page 40, paragraph 3.12.8 Significance After Mitigation, item 2).

There is no mitigation of this air pollution condition for the two residences on Toland Road nor the Santa Clara School on Highway 126.

Recommendation: Move the school to a non project impact environment and consider the same for the two residences on Toland Road.

Sincerely,
Chet M. Koski
Chet M. Koski
cc: J. Conaway
M. Johnson
A. Lorona
N. Palumbo

2
cont. Recommendation: Increase the width of Highway 126 in a westerly direction to provide additional left turn pocket capacity to Toland Road. This is in itself would mitigate highway accident risk to the school yard.

3 The lower portion of Toland Road has graded slope up to 8% and the school house is approximately 300 feet west of the intersection. Recommendation: Move the school house to a safer location more removed from the intersection and its proximity to Highway 126. The relocation should be done in the same general area so the same student boundary area would be served. The Ventura Regional Sanitation District (VRSD) is its own, "cash cow", and could pursue a land exchange or a purchase agreement for this relocation. The historical value of the Santa Clara School I believe is of significant value to the local community, the cities of Fillmore and Santa Paula, the County of Ventura and the State of California and should not be dismissed without due deliberation. You cannot buy historical values but you can preserve them with dollars. A relocation would mitigate the runaway truck risk, the stackup of trucks traveling east to Toland Road with the short left turn pocket and the risk of a serious accident occurring at the school grounds as a result of the stackup. Relocation would totally mitigate the shortcomings of air pollution and acoustic noise in the schools vicinity that will be discussed in the following paragraphs.

4 Comments on the second item. "Noise impact at the Santa Clara School". (Chapter 1 - page 10, paragraph 1.3.2.2).

"Landfill related truck and employee traffic would add to existing and future traffic noise along Highway 126. This would result in an increase in noise level of less than 1dBA at the school as a result of the projects future average daily trips (ATD's) on Highway 126". (Chapter 3.8 - page 28, paragraph 3.8.3.2 Land Use Compatibility, sub-paragraph Santa Clara School Item 2).

"The existing ambient noise ordinance limiting the equivalent noise level (LEQ) of 55dBA from 6 am to 7 pm". (Chapter 3.10 - page 4, paragraph 3.10.2.1 Noise Measurements at Sensitive Receptors Under Existing conditions item 2).

"Based on VRSD lack of sensitivity to the existing and proposed project impact to the noise levels at the school, they do not propose any mitigation measures which I feel are unconscionable. I therefore reiterates my previous recommendation regarding the Santa Clara School.

Recommendation: Move the school to a safe and quieter location.

**DOCUMENT 42
CHET M. KOSKI
RESPONSE TO COMMENTS**

Response 42-1

1. With respect to the Toland Road/Highway 126 intersection, this commenter correctly quotes Section 3.8.3.2 of the Draft EIR that "The level of service (LOS) if not mitigated would decrease from LOS "E" to "F." It should be noted, however, that the following sentence of the Draft EIR specifies that the LOS at the intersection would be a result of existing cumulative traffic and not the result of project-related traffic.

2. Table 3.11.3 should be read in the context of the section of Draft EIR that it supports. As discussed in Section 3.11.2.4, the LOSs of "E" and "F" for the southbound left turn movement from Toland Road to eastbound Highway 126 occurs whenever a single vehicle is waiting to make a left turn onto Highway 126. The LOS for this left turn movement is due to cumulative nonproject-related traffic on Highway 126, which does not provide adequate gaps in traffic for left turns and would occur with or without the proposed project. As discussed in Section 3.11.2.4 of the Draft EIR, this situation is not limited to Toland Road and is expected to occur at other roads intersecting with Highway 126 between Santa Paul and Fillmore (e.g., Hall Road, Sycamore Road) that are not affected by the proposed project. As shown in Table 3.11.10 of the Draft EIR, the existing LOS for the southbound left turn movement at this intersection is "F," and the remaining movements at this intersection are currently at acceptable service levels and would continue to operate at acceptable levels with or without the proposed project.

3. The comment's recommendations for intersection improvements have been considered and analyzed. As discussed in Section 3.11.7 of the Draft EIR, the Toland Road/Highway 126 intersection is within the jurisdiction of Caltrans. Based on Caltrans' review of the traffic study for the proposed project, it recommended traffic safety improvements to mitigate potential project impacts (see Comment Letter 02). The traffic safety improvements recommended by Caltrans include the installation of an intersection control flashing beacon at Toland Road/Highway 126, standard intersection lighting, and appropriate signage along Highway 126. See Table 1.1 of this Final EIR for the complete list of traffic mitigation measures.

4. The intersection improvements as recommended by Caltrans and included in the EIR as mitigation measures would mitigate potential traffic-related safety issues at the intersection. The inclusion of these measures does not, however, alter the findings or conclusions of the Draft EIR regarding the LOS. As discussed in Section 3.11.6 of the Draft EIR, without signalization, the southbound, left-turn movement from Toland Road to eastbound Highway 126 would continue to operate at an unacceptable LOS, with or without the proposed project. Without signalization at the Toland Road/Highway 126 intersection, cumulative impacts would constitute a significant unavoidable adverse impact, and a statement of overriding considerations would be required.
5. Notwithstanding Caltrans' determination that a signal is not required at the intersection of Toland Road and Highway 126, in the event that at some time in the future Caltrans decides a signal is required, VRSD has agreed to pay the cost for the signal. While this is not a mitigation measure in terms of CEQA, VRSD would accept a condition to this effect in the CUP for the proposed project.

Response 42-2

1. As noted in this comment, it is possible that a runaway truck southbound on Toland Road could crash into oncoming traffic or proceed in the direction of the Santa Clara School, however, the probability that such an accident could affect the school is remote. As discussed in Section 3.11.1.3 of the Draft EIR, the school is located approximately 300 feet west of the Toland Road/Highway 126 intersection. A truck that was unable to stop at the intersection is far more likely to travel straight through the intersection and into the orchards on the south side of Highway 126 as it would not be able to successfully make a right-hand turn at a speed exceeding 30 to 35 mph. Neither Caltrans or the County Department of Transportation, the responsible agencies for the operation of this intersection, has identified hazardous conditions at the intersection of Toland Road and Highway 126.
2. As discussed in Section 3.11.3.1.2 of the Draft EIR, the existing 120-foot, left-turn pocket exceeds the minimum length required pursuant to the Caltrans Highway Design Manual (Caltrans, 1995). The Caltrans design standard for left-turn vehicle storage is based on the number of turning vehicles likely to arrive in an average two minute period during the peak hour (Caltrans, 1995). If the number of trucks during the peak hour represent 10 percent or more of the traffic volume, left-turn vehicle storage space for a minimum of one passenger car and one truck should be provided. As shown in Table 3.11.2, trucks average approximately

11.5 percent of the traffic at the Toland Road/Highway 126 intersection. Based on the peak hour estimate for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The design standard for the left-turn vehicle storage length would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car).

3. Under the "proposed case" and the use of transfer trucks, during the peak hour a waste truck would arrive at the intersection an average of once every 10 minutes. Based on the longer truck length for transfer vehicles, the required left-turn storage length for the "proposed case" would be 85 feet (60 feet per transfer truck and 25 feet for the passenger car). Based on the Caltrans design standard, therefore, depending on whether packer trucks or transfer trucks are used, the required left-turn pocket length at the intersection of Toland Road and Highway 126 would range between 65 feet and 85 feet. The existing 120-foot left-turn pocket and configuration at this intersection and approach lanes, as shown in Figure 3.11.3 of the Draft EIR, provides waste trucks and other vehicles adequate distance to safely approach the intersection. Widening of Highway 126 to accommodate a longer left-turn pocket as recommended in this comment, is therefore, not required.

Response 42-3

1. The proposed project would not result in significant impacts to the Santa Clara School. Potential project-related impacts which could affect the school are summarized in Section 3.8.3.2.1 of the Draft EIR. As discussed in Response 42-2 above, the potential for a runaway truck on Toland Road to impact the school or school grounds is remote, and the left-turn pocket at Toland Road/Highway 126 can adequately accommodate project-related vehicles. Hazardous conditions for the school have not been identified.
2. Relocation would risk the condition of the historical school building. Neither the school district administrators nor the teacher at the school have recommended relocation during participation in the EIR scoping and review process.

Response 42-4

1. As discussed in Section 3.10.6 of the Draft EIR, the existing and future nonproject traffic-related cumulative noise conditions along Highway 126 in the project vicinity constitute a significant impact. The Draft EIR also discussed, however, that the project-related traffic

volume would result in only an incremental increase to noise level at the Santa Clara School when compared to the existing and future nonproject traffic-related cumulative noise levels. Based on this finding, Section 3.10.8 of the Draft EIR specifies that a statement of overriding considerations for the cumulative nonproject traffic-related noise impact will be required.

2. As discussed in Section 3.10.4 of the Draft EIR, the proposed project's contribution to the traffic-related cumulative noise impact would be a maximum increase of 0.6 dBA under the "worse case" traffic scenario for 2015. In addition, the noise impact due to nonproject-related cumulative traffic on Highway 126 extends beyond the vicinity of Toland Road. Noise conditions along Highway 126 represent a regional issue and are not the responsibility of VRSD. Mitigation measures for the nonproject-related cumulative noise impacts were, therefore, not proposed as part of the proposed project.
3. The County is responsible for determining appropriate project conditions and to consider surrounding land use compatibility when making required County Zoning Ordinance findings. It is important to note, however, that County Zoning Ordinance findings are based on project specific impacts only and are not based on cumulative impacts.
4. The following County General Plan noise standard applies to the proposed project:
 - 1-hour Leq of 55 dBA, or ambient noise level plus 3 dBA (whichever is greater) during any hour between 6:00 a.m. and 7:00 p.m.

As long as the project specific noise impacts do not result in an increase in excess of 3 dBA, the project is considered to meet the County General Plan standards and a consistency finding, as required by the County Zoning Ordinance, can be made. As discussed above, the proposed project's contribution to the traffic-related cumulative noise level at the Santa Clara School would be a maximum of 0.6 dBA under the "worse case" traffic scenario for the 2015. Therefore, the proposed project does not exceed the applicable County General Plan noise standard and a consistency finding can be made under the County Zoning Ordinance.

5. Mitigation of the cumulative noise impacts from the nonproject-related traffic volumes on Highway 126 could include the construction of a sound wall along portions of the highway, and/or window and/or building retrofitting of Santa Clara School. As with traffic impacts, measures to mitigate conditions within the right-of-way of Highway 126 would require review and approval by Caltrans. Proportionate (i.e., "fair share") funding of these improvements could be considered by the County for individual projects which contribute to traffic on Highway 126.

Response 42-5

1. As discussed in Section 3.12.8 of the Draft EIR, for purposes of the EIR it has been determined that the proposed project would result in a regional air quality impact associated with offsite mobile emissions that may not be able to be mitigated to below a level of significance. VRSD will consult with the APCD regarding the feasibility and practicality of measures available to reduce offsite mobile emissions to below a level of significance.
2. CEQA provides authority to approve a project which may result in significant unavoidable environmental effects. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impact.
3. While the offsite mobile emissions associated with the proposed project are determined to be regionally significant due to the County's nonattainment status for ozone, as discussed in Section 3.12.3.2.3 of the Draft EIR, the offsite mobile emissions would not result in a significant impact on local air quality, and would not impact the Santa Clara School or the residences along Toland Road. Therefore, it is not necessary to relocate the Santa Clara School and the two residences along Toland Road.

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OCT 23 1995

PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND
CLOSURE/POSTCLOSURE

Submit to VRSD representative at the Public Meeting, or mail or hand deliver to: Ventura Regional Sanitation District, Attention: District Manager, 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or hand delivered comments must be received at the above address by 5:00 p.m. on Monday, November 6, 1995.

The EIR has not adequately addressed the Safety and Health issues caused by the project on the school located on Highway 126 near Toland Rd. Specifically, the EIR did not adequately consider the effects of large trucks decelerating and changing lanes (causing a very hazardous situation) right in front of the school. Also, as the left turn eastbound is shown to be impacted, the trucks will have to stop, idling pollutants into the air, again right in front of the school.

Also, the EIR did not consider adequately the impact as they turn onto the highway from Toland Rd. The trucks will be accelerating right in front of the school. There will be expelling excess polluting elements into the air right in front of the school. Has the EIR given priority for a dump over children?

(OVER)

Submitted By: Scott Lee
Name (please print)
1005 Foothill Dr.
Street Address
Fillmore CA 93015
City State Zip

I am also a teacher, and the EIR did not adequately address the noise and air quality effects the accelerating and decelerating the trucks will have on the ability to teach. This is an environmental concern!

**DOCUMENT 43
SCOTT LEE
RESPONSE TO COMMENTS**

Response 43-1

1. The assessment of highway safety and design for the proposed project was prepared by a licensed traffic engineer (WPA, 1995) and in accordance with the County's "Guidelines for Preparation of Environmental Assessment for Public Highway Safety and Design" (County, 1992). The potential impacts associated with operations of the Toland Road/Highway 126 intersection, including highway safety and design issues associated with the eastbound, left-turn movements at this intersection, were evaluated in the traffic study prepared for the proposed project. The findings of the traffic study are incorporated into Section 3.11 of the Draft EIR, and are the basis for the mitigation measures included in Section 3.11.7 of the Draft EIR.
2. As discussed in Section 3.11.7 of the Draft EIR, the Toland Road/Highway 126 intersection is within the jurisdiction of Caltrans. Based on Caltrans' review of the traffic study for the proposed project, it recommended traffic safety improvements to mitigate potential project impacts (see Comment Letter 02). The traffic safety improvements recommended by Caltrans include the installation of an intersection control flashing beacon at Toland Road/Highway 126, standard intersection lighting, and appropriate signage along Highway 126. See Table 1.1 of this Final EIR for the complete list of traffic mitigation measures.
3. Neither Caltrans or the County Transportation Department identified hazardous conditions at the Toland Road/Highway 126 intersection. In addition, these agencies have concurred with the traffic study's conclusion that signal warrants at this intersection would not be met by the proposed project (see Comment Letters 02 and 13). Moreover, as discussed in Section 3.11.3.1.3 of the Draft EIR, the accident rate along Highway 126 in the vicinity of Toland Road is substantially lower than the statewide average. The flashing beacon and warning signs, as recommended by Caltrans and included in the EIR as mitigation measures, would mitigate potential traffic-related safety issues at the intersection.
4. Notwithstanding Caltrans' determination that a signal is not required at the intersection of Toland Road and Highway 126, in the event that at some time in the future Caltrans decides a signal is required, VRSD has agreed to pay the cost for the signal. While this is not a mitigation measure in terms of CEQA, VRSD would accept a condition to this effect in the CUP for the proposed project.

5. This comment expressed particular concerns regarding the eastbound left turn onto Toland Road. As discussed in Section 3.11.3.1.1 of the Draft EIR, this movement, currently operates at LOS "B" and would continue to operate at an acceptable service level (LOS "C") under cumulative conditions with the proposed project. This finding was reviewed and accepted by Caltrans and the County Transportation Department. In addition, as discussed in the Draft EIR, excessive vehicle stacking for this movement is not anticipated since the left-turn pocket provides adequate storage length. Based on peak hour estimates for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The Caltrans design standard, based on the number of turning vehicles likely to arrive in an average two minute period during peak hour, for vehicle storage in the left-turn pocket would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car). The existing 120-foot, left-turn pocket for eastbound traffic exceeds this requirement.
6. As discussed in Section 3.10.4 of the Draft EIR, noise levels from the existing and future nonproject-related traffic volumes on Highway 126 result in a cumulative impact at the Santa Clara School. Noise conditions along Highway 126 represent regional issues. Mitigation measures for the nonproject-related cumulative noise impacts were not proposed as part of the proposed project.
7. Based on this and other comments, the carbon monoxide (CO) analysis has been revised to include the estimated maximum waiting time for vehicles making the left-turn from Highway 126 onto Toland Road, as well as the estimated maximum waiting times for the other turning movements at this intersection. Under existing conditions, plus the proposed project, an average delay of approximately 7 seconds for left turn movements from Highway 126 onto Toland Road is estimated (WPA, 1995). This does not represent a significant increase over the approximately 6-second delay currently experienced by vehicles at this intersection. Under buildout cumulative conditions in 2015, which include all sources of traffic, average delays of 19 seconds are estimated for left turns from Highway 126 onto Toland Road (WPA, 1995).
8. As shown in Revised Table 3.12.12 (see Section 3.2 of this Final EIR), the maximum CO concentrations associated with the proposed project would be 0.8 and 0.6 parts per million by volume (ppmv) for the 1-hour and 8-hour averaging times, respectively. When added to the background CO concentrations of 5.1 and 2.6 ppmv for the 1-hour and 8-hour average, respectively, the proposed project would not exceed the ambient air quality standard for CO (see Revised Table 3.12.12). Therefore, the revision of the CO analysis does not alter the findings or conclusions of the EIR.

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NOV 07 1995

V. R. S. D.

November 6, 1995

Ventura Regional Sanitation District
 1001 Partridge Drive, Ste. 150
 Ventura, CA 93003-5562

Attn: District Manager

Dear Sir:

We are writing to you as property owners, in the process of building a family home on our property (4075 Toland Road), situated almost adjacent to the proposed expanded Toland Road Landfill.

We strongly object to your landfill expansion plan for the following reasons:

1. We now can smell the odor of the dump site at it's present size, when the wind comes from the east. Increased dump size will inevitably increase this odor problem. (1)
2. Trash from the present dump site can be found on our property, having been blown there by east winds. (2)
3. Increased traffic on Highway 126 and Toland Road would adversely effect our health and safety. During wet weather the present highway pavement on the east bound - right lane, from Santa Paula to Toland Road becomes dangerously "pot-holed". This condition would become intolerable with added trash truck traffic. (3)
4. Our drinking water comes from a well on the west side of O'Leary Creek (The Toland Road Water System). The well site is directly below the dump site. Our water comes from a shallow source ("a strata well") and is subject to water shortage during drought conditions. The county dump will inevitably affect our sole water source; either by diminishing our water quality, quantity, or both. Our property would be of no value to ourselves and our heirs without a reliable source of water. (4)
5. Our last object is probably the most important one voiced by ourselves and by many many of our area neighbors. The area that you propose to cover over with rubbish possesses such beauty - for all to see - with some of the last places for wild life to call home. To destroy it forever would be a tragic mistake. (5)

We fervently request that you seek alternate means for dealing with county refuse, either thru more stringent recycling, or transfer to more appropriate - remote sites.

With regards,

Claudia and Robert Leidecker
 Claudia and Robert Leidecker (P.O. Box 749, Sta. Paula, 93060)

Windy and Scott Hatton
 Windy and Scott Hatton (10718 Citrus Dr., Moorpark, 93021)

DOCUMENT 44
CLAUDIA AND ROBERT LEIDECKER
AND WINDY AND SCOTT HATTON
RESPONSE TO COMMENTS

Response 44-1

1. The potential impacts of odorous emissions from the proposed landfill operations were discussed in Section 3.14.3.1.2 of the Draft EIR. Odors generated by exposed waste at the working face would be minimized by the following factors:
 - Application of cover material (a minimum thickness of 6 inches) during each day. On average, an area of waste would be exposed for four to six hours before it is covered.
 - Waste would only be exposed to the atmosphere during hours when the landfill is open and accepting waste (i.e., 6:00 a.m. to 6:00 p.m.).
 - The working face would be kept small to minimize the amount of exposed waste and the potential associated odors.

In addition, the existing operation at Toland has not experienced issues associated with the detection of odors offsite.

2. Because winds that dilute odor are usually most brisk during daylight hours and most calm at night, odors would be most effectively diluted by wind during the daylight hours when waste would be exposed at the working face. Based on the above factors, no significant impacts from odorous emissions are expected.

Response 44-2

1. Section 3.14.5 of the Draft EIR included operational procedures and regulatory requirements that would minimize the potential effects of litter associated with the proposed project, including the effects of wind-borne waste and litter carried offsite. In accordance with CCR Title 14, the following measures shall be implemented at the landfill to control litter:
 - Waste shall be compacted at the working face of the landfill.
 - Periodic application of daily cover or alternative cover during the day and at the end of the working day.
 - During periods of high winds, more frequent application of cover material.
 - Maintain the working face at as small an area as safely practicable given the type of and number of landfill equipment operating at the working face.
 - 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.

2. In response to this and other comments, the following additional mitigation measures have been included in the EIR to better define the litter control program:
 - Litter control crews shall inspect the landfill fences (permanent and portable fences) on a weekly basis and remove litter.
 - During periods of high winds, litter control crews shall be dispatched at least twice a week, or more frequently if required, to inspect the landfill fences (permanent and portable fences) and remove litter.
 - 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.
3. As discussed in Section 3.14 of the Draft EIR, VRSD would take appropriate steps if there is a recurring situation regarding inadequate covering of waste loads by a particular hauler. In response to this and other comments, a mitigation measure has been included in the EIR to clarify these actions, that may include reporting the waste hauler to the LEA (which oversees inspection and tagging procedures for commercial vehicles) and/or the County Sheriff's Department and California Highway Patrol (which enforces the California Vehicle Code). Violation of the California Vehicle Code is punishable by fines and/or jail. This additional mitigation measure and those stated above, would further reduce the potential impacts of litter from the proposed project to below a level of significance.
4. The inclusion of these additional mitigation measures in this Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project. Also see Table A.1 of Appendix A of this Final EIR for a combined listing of the operational procedures and regulatory requirements, and mitigation measures including those noted above for litter control.

Response 44-3

1. Maintenance of Highway 126 is the responsibility of Caltrans and is primarily financed by motor fuel taxes and vehicle registration fees. The taxes and fees are structured so that heavy duty vehicles contribute funds proportionate to their increased road impacts relative to passenger vehicles.
2. As discussed in Section 3.11.3 of the Draft EIR, proposed project traffic, consisting of 450 vehicles based on the conservative "worse case" of waste transfer by packer trucks, would represent only approximately 2.3 percent of the future (i.e., 2015) ADTs on Highway 126 west from Toland Road towards its interchange with Highway 101. The "proposed case" of

210 vehicles would represent 1.2 percent of the future ADTs on Highway 126. It is unlikely, therefore, that the minimal contribution of traffic due to the proposed project would result in an intolerable pot-hole condition on Highway 126.

Response 44-4

- 1 As discussed in Section 3.3.3.1.2 of the Draft EIR, approximately 30-acre feet per year of nonpotable water would be provided to the proposed project from one or a combination of the three following sources:
 - A new offsite well located south of Toland Park.
 - A proposed new onsite well on VRSD's 53-acre parcel.
 - An agreement with the Rio Plaza Water Company for VRSD to purchase water for transport to Toland by truck.
2. VRSD has a signed agreement with the Rio Plaza Water Company to provide water for the proposed project. A copy of this agreement is included in Appendix E of this Final EIR.
3. The offsite well located south of Toland Park has been completed and draws water from the Saugus Formation. As discussed in Section 3.3.2.1.1 of the Draft EIR, the Saugus Formation consists of crudely bedded alluvial conglomerate that is the primary aquifer for ground water of the Santa Paula-Sespe Basin. The well has a capacity of 500 gpm. The proposed project would require 30 acre-feet of water per year to meet its requirements for nonpotable water. The owner has agreed to provide VRSD the water required for the proposed project.
4. The proposed new well on VRSD's 53-acre parcel is also situated in the Saugus Formation. No specific feasibility study has been completed for this well and it is considered speculative.
5. Of the three sources for nonpotable water, the agreement with the Rio Plaza Water Company was the only demonstrated source at the time the Draft EIR was prepared. It is for this reason that the traffic, noise and air quality analysis in the Draft EIR included the impacts associated with delivery of water from El Rio by truck. A revised mitigation measure is included in Table 1.1 of this Final EIR that requires VRSD to offset water withdrawn by these wells by reduction of water usage at the Bailard and Coastal landfills to mitigate the project's contribution to overdraft of the Oxnard Plain.

6. If detailed hydrogeologic investigations determine that a new well to supply the proposed project could affect adjacent wells, VRSD would evaluate its options. As one or a combination of the three sources of ground water identified in Section 3.3 of the Draft EIR would be able to support the proposed project, VRSD has sufficient options to provide water to the site without affecting ground water supplies in the area.
7. In addition, as discussed in Section 3.3 of the Draft EIR, based on the geologic and hydrogeologic conditions at Toland, and the landfill regulatory requirements included in CCR Titles 14 and 23, and Subtitle D (e.g., composite liner system, landfill gas collection system, leachate collection and removal system, etc.) the proposed project would not impact ground water quality.

Response 44-5

1. It is recognized that visual resources are subjective and based on the interpretations of individual viewers. As discussed in Section 3.9.3 of the Draft EIR, however, the impacts to visual resources in the vicinity would not be significant based on the relatively low number of newly disturbed acres and that the proposed project represents a continuation of current landfilling activities. Although implementation of the proposed project would represent some increased visibility in the area, land alterations would not represent a significant impact, due to the mountainous character of the surrounding topography, and the screening of the landfill by vegetation and orchards.

November 6, 1995

Ventura County Regional Sanitation District
1001 Partridge Drive
Ventura, CA

RECEIVED

cc: Ventura County
Board of
Supervisors

NOV 6 1995

V. R. S. D.

Dear Board Members:

I am a concerned homeowner and citizen of Fillmore, California. I am writing this letter in vehement protest of your current plans to expand the Toland waste site to ten times its current capacity. I believe the magnitude of the operation will have serious detrimental consequences to the communities of Fillmore and Santa Paula in three basic areas: the environmental, financial and aesthetic aspects.

Environment:

The first concern is, of course, air pollution, of which there are many components. Primarily among these components are the smell, the release of gases such as methane and others which reduce air quality and finally, dust and exhaust fumes raised from the increased truck traffic. We will experience a significant increase in air pollution should this landfill expansion occur. ①

The second concern involves water pollution. By increasing the height of the dump, I believe that you will accelerate the rate and amount of toxic leaching into the water table. By increasing the area, I believe surface runoff pollution will increase as well. We do not believe that the proposal for placing a "clay liner" in the dump site will adequately prevent toxic infiltration and seepage into the water table. ②

The third concern is the noise pollution that will result from the increased truck traffic either driving by our cities or the noise pollution to the site itself. ③

Financial:

My primary concern of financial impact is the resultant lowering of property values. I have yet to see a property that appreciated in value from the development or expansion of a landfill project.

When I moved here nearly ten years ago, neither the county nor private interests disclosed the intent then or in the future to expand the Toland waste site. ④

Will the homeowners and residents of Fillmore and Santa Paula be compensated monetarily because of loss of property values, poorer rate of resales of homes and the pain and suffering we will endure due to degraded air quality and nuisances of odor and noise?

Another concern is the defacto designation of Santa Paula and Fillmore as the East Counties "dumping ground". Such a label may discourage future desirable industries and upper scale

neighborhoods, resulting in the further deterioration of our communities.

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CONT.

Aesthetic:

The final component of this impact is the degradation of the pastoral and scenic beauty of this area. The vandalization of the beautiful hillsides and landscape with massive grading scars will create an aesthetic assault on all of us who live here. The loss due to this assault may not be measurable or gaugable financially, but the loss will be perceived and be real, creating a substantial negative impact on all of us. ⑤

In closing, I can assure you that should the project be initiated, I will file a class action lawsuit on behalf of the citizens of Fillmore and Santa Paula to ensure that our lands and environment are preserved from harm.

I have also enclosed a list of questions that I wish to have the Sanitation Board and the Board of Supervisors address.

Sincerely,



George Lindgren

Encl. 1

QUESTIONS TO BE ADDRESSED

- 1.) Isn't one of the primary reasons for the closure of the Bailard Landfill because of homeowner's concerns about its safety and negative impact on residents in the area? Do the citizens of Fillmore and Santa Paula have any less reason to be concerned about the safety and negative ramifications of an expansion of Toland Landfill? 6
- 2.) Do you feel that the areas of Fillmore and Santa Paula have less political and economic power than other areas in the County and thus, you can treat our area as a "dumping ground" for the County's trash? 7
- 3.) How do you plan on compensating all the homeowners and residents affected financially and health-wise? Do you plan on providing monetary compensation for loss of property values, poorer rate of resales of homes, as well as the pain and suffering endured by residents due to degraded air quality and odor and noise pollution? 8
- 4.) How do we know that all of the proposed mitigation measures described in the Draft Environmental Report will be put into effect? What guarantees can you give us that such mitigation measures will be enforced or that they will even work? 9
- 5.) How can we be sure that the Draft Environmental Report is truly objective and not biased in favor of the Ventura County Regional Sanitation Board's objectives? Why was the study funded by the Sanitation Board and not by the Ventura County Board of Supervisors? I get the distinct feeling, when reading the Report, that the words "not significant", with regard to possible impacts, were used with flagrant environmental and civil disregard. 10
- 6.) What recourse, in your view, do we have if we do not agree with the Board's approval of the project? 11
- 7.) The Draft Environmental Report's findings do not seem to agree with reports from other landfills around the State and even Ventura County, where serious health problems (nausea from odors, toxic leaching into the water table) have been observed. 12

**DOCUMENT 45
GEORGE LINDEGREN
RESPONSE TO COMMENTS**

Response 45-1

1. Air quality impacts associated with the proposed project were addressed in Section 3.12 of the Draft EIR. As discussed in the Draft EIR, air emissions associated with the proposed project would be accompanied by corresponding emissions reductions at Bailard as landfilling operations shift to Toland. Shifting landfilling operations from Bailard to Toland reflects a realignment of waste disposal within the County, and does not represent an increase over the baseline emissions inventory for the County. Therefore, on a County-wide basis, air emissions associated with the proposed landfill operations and onsite equipment at Toland would not represent a significant emissions impact.
2. Notwithstanding that the proposed project represents a shift of air emissions associated with solid waste disposal activities on a County-wide basis, as discussed in Section 3.12.3.2.1 of the Draft EIR, the proposed landfill operations and onsite equipment at Toland were analyzed to determine if the proposed project would result in the exceedance of state or federal ambient air quality standards at or beyond the project boundary. As documented in the Draft EIR, the proposed project would not result in state or federal ambient air quality standards being exceeded at or beyond the project boundary. Therefore, based on the significance thresholds developed by APCD, the air quality impacts associated with the onsite operations under the proposed project would be below a level of significance both on a County-wide and local basis.
3. Offsite mobile air emissions resulting from the additional vehicle miles traveled to Toland versus Bailard to transport 1,500 tons of waste per day, would result in a significant air quality impact on a County-wide basis, but on a local basis would not be significant. It is important to note that as discussed in the Draft EIR, however, the offsite mobile air emissions associated with the proposed project at Toland would be less than transporting 1,500 tons of waste per day to the Simi Valley or Chiquita Canyon landfills.
4. With regard to the concern expressed in the comment regarding the release of methane and other gases, Section 2.5.5 of the Draft EIR discussed the operational procedures that would be implemented to control landfill gas. Municipal solid waste contains organic and other material

that decompose and produce various gases, primarily methane and carbon dioxide. The proposed project would be constructed with a composite liner system to restrict migration of landfill gas and a landfill gas collection system to reduce the potential for gas to migrate beyond the site. The collected landfill gas would be flared at an onsite landfill gas flare station, as shown in Figure 2.4 of the Draft EIR. In addition, gas monitoring probes would be installed on the landfill perimeter to monitor methane concentrations. No significant impacts are expected with regard to landfill gas from the proposed project.

Responses 45-2

1. The proposed project consists of both a vertical and lateral expansion of Toland. The vertical expansion component of the proposed project includes the placement of additional waste on top of waste already landfilled at the site. Vertical expansions of existing landfills are allowed by state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) without a requirement to excavate previously landfilled waste to allow the installation of a composite liner system. Lateral expansions of existing landfills are required by state and federal regulations to include a composite liner system. Therefore, based on state and federal landfill regulations, the proposed project includes a composite liner for the lateral expansion component of the project.
2. As discussed in Section 2.5.1 of the Draft EIR, for the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot thick low permeability intermediate soil barrier would be installed. Incorporated with the intermediate soil barrier is a landfill gas collection system, and leachate collection and removal system. The design of the intermediate soil barrier system shall take into account the overburden weight of the new waste and shall account for any settlement that may occur.
3. The intermediate soil barrier to isolate the existing waste from the new waste is not required by state or federal landfill regulations for vertical expansions, however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.
4. In addition, as discussed in Section 3.3 of the Draft EIR, based on the geologic and hydrogeologic conditions at Toland, and the landfill regulatory requirements included in

CCR Titles 14 and 23, and Subtitle D (e.g., composite liner system, landfill gas collection system, leachate collection and removal system, etc.) the proposed project would not impact ground water quality.

5. Based on the volume of stormwater that could flow from the site during the 100-year, 24-hour storm event, the detention basin would be approximately 250 feet by 150 feet and 10 feet deep. Construction of the detention basin would require a National Pollution Discharge Elimination System Permit (NPDES) from the RWQCB under the Federal Clean Water Act as a point source discharge for stormwater, and would require a building permit from the County Building and Safety Division.
6. The maximum water release rate from the detention basin would be equal to the current stormwater discharge rate from the site for the 100-year, 24-hour storm event. Based on the preliminary hydrology calculations in Appendix C of the Draft EIR, the current stormwater discharge rate from the site is estimated to be 337 cubic feet per second (cfs). The detained stormwater would be released from the basin via a pipe sized to limit the outflow to a maximum of 337 cfs. As the release of water from the detention basin would be through a pipe sized to a maximum of 337 cfs, there would be no requirement to monitor the outflow volume. The detention time in the basin provides the mechanism through which the sediment in the water settles to the bottom of the basin. Collected sediments would be removed routinely as part of regular maintenance activities at the landfill.

Response 45-3

1. As discussed in Section 3.10.6 of the Draft EIR, the proposed project would not cause a project-related noise impact on Highway 126. The existing and future nonproject traffic-related cumulative noise conditions along Highway 126 in the project vicinity constitute a significant impact. The proposed project's contribution to the traffic-related cumulative noise impact would be a maximum increase of 0.6 dBA under the "worse case" traffic scenario for 2015.
2. The noise impact due to nonproject-related cumulative traffic on Highway 126 extends beyond the vicinity of Toland Road, including the freeway portion of Highway 126 through Santa Paula. Project-related traffic would represent 2.3 percent of the future ADTs on Highway 126 under the "worse case" traffic scenario defined in the Draft EIR and 1.2 percent

under the "proposed case." Noise conditions along Highway 126 represent a regional issue and are not the responsibility of VRSD. Mitigation measures for the nonproject-related cumulative noise impacts were, therefore, not proposed as part of the proposed project.

3. The proposed project would not generate additional waste truck traffic east of Toland Road. Noise levels on Highway 126 east of Toland Road and through Fillmore would, therefore, not increase due to the proposed project.

Response 45-4

1. As discussed in Section 3.8.6 of the Draft EIR, the proposed project would be consistent with existing applicable plans and policies of the County General Plan. As the proposed project is a continuance of a current land use, no loss in property values is expected.

Response 45-5

1. It is recognized that visual resources are subjective and based on the interpretations of individual viewers. Landfilling operations, however, would not be visible from throughout the area. The proposed project is located in a confined canyon and most landfill activities that would occur would be obscured, because of the surrounding topography, distance to the landfill from possible viewing areas, and surrounding orchards.
2. As discussed in Section 3.9.3 of the Draft EIR, the impacts to visual resources in the vicinity would not be significant based on the relatively low number of newly disturbed acres, in addition to the project being a continuation of current landfilling activities. Although implementation of the proposed project would represent some increased visibility in the area, land alterations would not represent a significant impact, due to the mountainous character of the surrounding topography, and the screening of the landfill by vegetation and orchards.

Response 45-6

1. The closure of Bailard is anticipated in the summer of 1996 when it is projected that the landfill would reach its permitted tonnage limits. In accordance with the revised CUP issued by the County, Bailard is allowed to operate until it either reaches its tonnage limit, its

permitted contour elevations, or May 1997, whichever occurs first. In accordance with CCR Titles 14 and 23, Bailard must be operated in a manner to assure that it does not impact surrounding land uses or result in nuisances offsite.

2. In approving the revised CUP for the permit time extension of Bailard in 1994, the County Planning Commission and Board of Supervisors determined that adequate conditions and permit requirements were available to assure that Bailard would operate in a safe manner and that the landfill was compatible with surrounding land uses.
3. The proposed project at Toland would be required to meet the same standards included in CCR Titles 14 and 23 as Bailard, and must be found by the County Planning Commission and Board of Supervisors to be compatible with surrounding land uses before a revised CUP can be approved.

Response 45-7

1. This comment raises a political issue which is not addressed through the EIR process.

Response 45-8

1. As discussed in Response 45-4 above, no loss to property values is expected with implementation of the proposed project. Section 3.13 of the Draft EIR detailed the health risk analysis performed for the proposed project. No significant health risks are expected in relation to the proposed project, due to implementation of operational procedures, regulatory requirements, and permit requirements.

Response 45-9

1. A Mitigation Monitoring and Compliance Program will be prepared for use in implementing the mitigation measures included in the EIR. This program will be prepared in compliance with Section 21081.6 of the Public Resources Code, which requires that public agencies adopt a monitoring program for measures that are included as part of a proposed project to mitigate or avoid significant effects to the environment. The program will be submitted along with the EIR to the VRSD Board of Directors. The Mitigation Monitoring and Compliance Program will be available to agencies, after certification of the EIR.

Response 45-10

1. The Draft EIR was prepared by an independent third party under contract to VRSD. The consultant has no interest in the future outcome of the project. VRSD took the role of lead agency based on criteria listed in the CEQA Guidelines. This criteria for identifying the lead agency when two or more public agencies will be involved with a project:
 - "If the project will be carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency." (Section 15051 (a))
 - "Where more than one public agency equally meet the criteria in subsection (b), the agency which will act first on the project in question shall be the Lead Agency." (Section 15051 (c))
2. Based on the criteria listed in the CEQA Guidelines, VRSD is the appropriate lead agency for the proposed project. VRSD acting as the lead agency for the proposed project is analogous to a city or county acting as the lead agency for a public works project they are implementing. Other agencies (referred to in the CEQA Guidelines as responsible agencies) will use the EIR in the process for issuance of the various permits required for the proposed project. The pertinent requirements of these agencies have been considered in the environmental analyses.
3. As discussed in Section 3.1.2 of the Draft EIR, the significance of potential impacts was assessed based upon criteria established for each environmental topic. Appendix G of the CEQA Guidelines and the County's Initial Study Assessment Guidelines (1992a) provided guidance on effects that would normally be significant. Considerations of significance were based upon change to the existing environment and a determination of what would constitute a substantial detrimental effect.

Response 45-11

1. This Final EIR is distributed for a 10-day notification period before the VRSD Board of Directors can hold a hearing to consider certification of the EIR. Input on the EIR can be submitted during this time and would be part of the public record, and would be considered by the VRSD Board of Directors during its certification hearing for the EIR. In addition, before the proposed project can be implemented, it will require a revised CUP from the County. In the event members of the public do not agree with the VRSD Board's decision regarding the proposed project, they may make their concern known during the County Planning Commission and Board of Supervisors hearings on the CUP.

Response 45-12

1. It is unclear as to what the comment refers to with regard to "...reports from other landfills around the state and Ventura County." Without providing specific references to these "reports" it is not possible to prepare a response to this comment.

Kathy Long FOR SUPERVISOR

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Page 2
Herrera

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October 12, 1995

RECEIVED

OCT 17 1995

V. R. S. D.

Mr. Andres Herrera, Chair
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003-5562

Dear Mr. Herrera:

As a constituent within the Regional Sanitation District, and a candidate for the Third District Supervisor's seat, I wanted to take this opportunity to comment on the proposed expansion of Toland Landfill. I'd like to express my thanks to the District for holding a public hearing in Santa Paula. I believe the public deserves the opportunity to be heard, prior to spending millions of taxpayers' dollars to expand the existing landfill.

As you know, over the last five years, waste policies, markets, and technologies have been going through very dynamic evolutions. By the year 2000 at least 50% of Ventura County's solid waste must be recycled or otherwise diverted from landfills. Ventura County is on the cutting edge of new recycling technologies and market development proposals, that will not only help us to accomplish state-mandated recycling goals, but will stimulate the economy.

Bailard landfill must close by 1997, or earlier. Yet, what I hear coming from the District is the same solution -- "dig a hole and bury" the residuals, despite the feelings of those residents who must bear the burden of the environmental impacts.

Unfortunately, this would be a hole that would probably cost millions of dollars to construct and satisfy local, state and federal conditions. To offset the cost of this new hole, VRSD would need to ensure that a minimum amount of tonnage is received, or charge a high enough tipping fee to ensure that the taxpayers investment will be recouped. That puts ratepayers in a position where the more they recycle the more they'd have to pay to have the residual waste landfilled. I see that as a disincentive to recycling.

Certainly, I understand that despite our best efforts to recycle there will always be residuals that need disposal. I believe those needs can be met with the existing facilities and transport options for disposal.

If one thing has become abundantly clear over the last two years, it is that there is no waste disposal crisis in Ventura County. Within a 30 mile radius of Ventura County there is currently capacity in existing landfills, without using Simi Valley, to dispose of 38 million tons of waste. At our current rate of disposal those landfills could last us until the end of the next decade.


A Joint Powers Authority (JPA) of some west county cities and County government, will soon have a report on options available to the West County for waste management and disposal. That, in all likelihood, will not include a new or expanded landfill in Ventura County. Once the members of the JPA decide to pool their residuals and make use of out-of-county landfill options for disposal, and maximize local marketing of recycled materials, an expansion of Toland becomes unnecessary.

The bottom line must be examined -- would expansion of Toland Road landfill truly provide the taxpayers a cost-effective solution? At what cost can the environmental impacts to the regions' air quality, traffic, water, and agricultural lands be fully mitigated? These questions need to be answered.

The bottom line is that we don't need an expanded Toland Road landfill as a solution. There is not a crisis, the solutions are market-driven, and the public deserves the most cost-effective waste disposal policy possible. Implementing the strategies with a united voice, will send a message to the taxpayers that their dollars are better spent on market solutions, not old solutions.

Please include this letter as part of the public record pertaining to Toland Road expansion proposal. Thank you.

Sincerely,



Kathy I. Long, Candidate
Third District Supervisor

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**DOCUMENT 46
KATHY LONG
RESPONSE TO COMMENTS**

Response 46-1

1. The estimated 1,500 tpd waste to be disposed at Toland under the proposed project is based on waste disposal projections included in the SRREs for the cities served by VRSD which assume full compliance with AB 939 and 50 percent diversion by 2000. Although Ventura County may be on the "cutting edge" of new recycling technologies and market development proposals, the potential to achieve a waste diversion rate higher than 50 percent is speculative and not reasonably foreseeable. As discussed in Section 4.6 of the Draft EIR, a study which documented the operating experiences of communities with the highest materials recovery levels in the country, found the highest net recovery rate of 56 percent for a small community (population less than 6,000) in New Jersey (Platt, 1991). The highest recycling/composting percentage documented in a major metropolitan area was 36 percent, achieved by the City of Seattle.
2. AB 939 not only establishes mandatory reductions in the volume of solid waste being landfilled, but also requires counties to demonstrate 15 years of landfill capacity for residuals. The need for landfill capacity in both the short-term and long-term is well-documented in the EIR. This finding is confirmed by a recent CIWMB report which lists Ventura County as one of twenty-one counties statewide which has less than 15 years remaining disposal capacity (CIWMB, 1995).
3. The potential to make use of out-of-County landfill options for waste disposal is evaluated in Chapter 4.0 of the Draft EIR. Under the No Project alternative, as defined in Section 4.8 of the Draft EIR, several existing landfills would accept a portion of the 1,500 tpd that would be disposed at Toland under the proposed project. Although not specifically referenced in the analysis, this would be the most likely scenario to occur under the Western Ventura County Joint Powers Authority's (JPA's) request for proposal (RFP) for waste disposal. Under this RFP, individual haulers would contract with jurisdictions to dispose municipal waste.
4. As discussed in Section 4.8 of the Draft EIR, because the Simi Valley and Chiquita Canyon landfills are the closest landfills to the service area, the analysis of waste diversion to these landfills represent the No Project alternative which would have the most potential to reduce environmental impacts. If waste was instead hauled to other, more distant landfills,

environmental impacts (particularly traffic and air quality) would be greater than those analyzed in the Draft EIR for the No Project alternative. As concluded in Section 4.8.2.3 of the Draft EIR, the No Project alternative would not be environmentally superior to the proposed project.

5. The staff of VRSD has provided the VRSD Board of Directors with detailed information regarding the economics of the proposed project, including the minimum daily tonnage rate necessary to make the proposed project economically viable. The Board of Directors will consider this economic information along with the EIR as it makes its decision regarding the proposed project.

RECEIVED

November 2, 1995

NOV 6 1995

To: Ventura Regional Sanitation District
Attn. General Manager
1001 Partridge Dr. Suite 150
Ventura CA 93003-5562

V. R. S. D.

I am a Ventura County resident, a U.S. citizen, a traveler on Highway 126, a homeowner in the immediate-influence zone of the proposed Toland Road Landfill Expansion, and a concerned and threatened human being.

I oppose the expansion of the Toland Road Landfill.

If the landfill is expanded as proposed, there will be:

increased danger of personal injury due to greatly increased traffic hazards; it is already very difficult to enter Highway 126 from access roads... more trash trucks exiting and entering 126 and more trucks traveling this already dangerous highway will create even more opportunities for 126 to live up to its infamous "Blood-Alley" nickname.

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increased threat to groundwater quality

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a negative impact on area agriculture upon which my livelihood depends

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decreased property values

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There are innumerable practical reasons for my opposition to this increased "dumping" on the Santa Paula-Fillmore area, but the primary purpose of this letter is to remind you, the representatives of the citizens, that the individual still has a voice in America—the question of whether or not the affected individual still has any effective power and/or influence on governmental decisions is immediately up to you.

The Santa Paula-Fillmore area is one of lower income and lower voter numbers than other areas of the county... does government translate this into lower safety needs and lower regard for quality of life?

I expect to be represented and will vote accordingly. I am a citizen who chooses to conform to traditional social standards that provide a basic quality of life; when I find myself constantly betrayed by the governing structures I have accepted as socially necessary, my respect for and confidence in government is continually eroded.

I request that you decide against the expansion of the Toland Landfill.

Sincerely, *Marjorie A. Miller*

Marjorie A. Miller
312 Willard Rd.
Santa Paula CA 93060

**DOCUMENT 47
MARJORIE A. MILLER
RESPONSE TO COMMENTS**

Response 47-1

1. The commenter's opposition to the proposed project is noted. Safety issues associated with Highway 126 are discussed in Section 3.11.2.5 of the Draft EIR. As depicted on Figure 3.11.4 of the Draft EIR, based on records from Caltrans, the accident rate along Highway 126 in the vicinity of the proposed project site is substantially lower than the statewide average. The highway is a four-lane divided roadway in the vicinity of Toland. Higher accident rates occur east of the project site, particularly east of Fillmore where the highway is only two lanes (with periodic passing lanes).
2. The proposed project would not generate additional waste truck traffic east of Toland Road. The number of vehicles transporting waste from the Santa Clara Valley (Santa Paula, Fillmore, the community of Piru and other unincorporated areas) is expected to continue to be at a maximum of approximately 70 per day. Since the proposed project would not contribute to additional traffic east of Toland Road, it is not anticipated to appreciably increase the accident risk along Highway 126 east of Toland Road. In addition, because the proposed project would represent approximately 2.3 percent of the future ADTs for the "worse case" traffic scenario (i.e., packer trucks to transport waste to Toland) on Highway 126 and 1.2 percent of the ADTs for the "proposed case" traffic scenario (i.e., transfer trucks to transport waste to Toland), the proposed project is not anticipated to appreciably increase the accident risk along Highway 126.
3. As discussed in Section 3.11.7 of the Draft EIR, the Toland Road/Highway 126 intersection is within the jurisdiction of Caltrans. Based upon review of the traffic study for the proposed project, Caltrans has recommended traffic improvements to mitigate potential project impacts (see Comment Letter 02). These improvements, included in the EIR as mitigation measures, would mitigate potential traffic-related safety issues at the intersection, including waste trucks exiting and entering Highway 126 to and from Toland Road.

Responses 47-2

1. The proposed project consists of both a vertical and lateral expansion of Toland. The vertical expansion component of the proposed project includes the placement of additional waste on

top of waste already landfilled at the site. Vertical expansions of existing landfills are allowed by state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) without a requirement to excavate previously landfilled waste to allow the installation of a composite liner system. Lateral expansions of existing landfills are required by state and federal regulations to include a composite liner system. Therefore, based on state and federal landfill regulations, the proposed project includes a composite liner for the lateral expansion component of the project.

2. As discussed in Section 2.5.1 of the Draft EIR, for the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot-thick low permeability intermediate soil barrier would be installed. Incorporated with the intermediate soil barrier is a landfill gas collection system, and leachate collection and removal system. The design of the intermediate soil barrier system shall take into account the overburden weight of the new waste and shall account for any settlement that may occur.
3. The intermediate soil barrier to isolate the existing waste from the new waste is not required by state or federal landfill regulations for vertical expansions, however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.
4. In addition, as discussed in Section 3.3 of the Draft EIR, based on the geologic and hydrogeologic conditions at Toland, and the landfill regulatory requirements included in CCR Titles 14 and 23, and Subtitle D (e.g., composite liner system, landfill gas collection system, leachate collection and removal system, etc.) the proposed project would not impact ground water quality.

Response 47-3

1. Potential project-related impacts to agricultural uses in the Santa Clara Valley are addressed in Section 3.8.3.2.2 of the Draft EIR. Included in the analysis are potential impacts due to changes in the frequency and severity of frosts, the impacts of increased fugitive dust on orchards, and the potential increase in pests. It is also important to note that the proposed project would not result in existing or potential agricultural lands being taken out of production. Based on the analysis, the proposed project would not have a significant impact on surrounding farming, and therefore would not affect the marketing success or viability of this industry in the County.

Response 47-4

1. As discussed in Section 3.8.6 of the Draft EIR, the proposed project would be consistent with existing applicable plans and policies of the County General Plan, and would be compatible with the agricultural land uses in the vicinity of Toland. As the proposed project is a continuance of a current land use, no loss in property values is expected.

RECEIVED

NOV 5 1995

V. R. S. D.

Toland Road Landfill - Review of DEIR
Page 2

November 5, 1995

Mr. Clinton L. Whitney - General Manger
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003-5562

Re: Response to Draft Environmental Impact Report - Toland Road Landfill
Expansion and Landfill Closure/Post Closure

Dear Mr. Whitney:

My family has been farming at the north end of Hall Road since the 1920's. We believe our home to be in the closest proximity to the proposed landfill expansion. Every aspect of this proposal will have a profound affect on our ability to continue living and farming on the property.

In my naiveté I expected a DEIR that was paid for by taxpayers dollars to be an unbiased document. I have spent days in my local library plodding through a DEIR five inches thick that is anything but unbiased. My first question goes to the legality of the VRSD acting as the lead agency producing their own Environmental Impact Report. Is VRSD the valid and appropriate "lead agency" for the EIR process?

Next, I wish to go on record as questioning every single conclusion and mitigation measure churned out by this DEIR. None of the concerns and potential problems expressed by the community have been resolved in any definitive manner. I am very concerned about the impact this landfill is going to have on our immediate Santa Paula/Fillmore communities and the county as a whole. However, I have become particularly concerned about those of us living closest to this landfill who have gone unnoticed in the mapping and "considerations" throughout this DEIR.

I have attached a map of the properties adjacent to the Toland Landfill with check marks identifying homes occupied by human beings. These are not barns or out-buildings. Examine it carefully. There are 53 residences within approximately a two mile radius of the proposed landfill expansion.

Originally my concerns were about yet more traffic and the affects that more dust would have on our already stressed biological pest control, etc. I was again in my naivete less worried about health risks because I honestly believed my government would never do anything to make us all sick. Now I am convinced that VRSD has not done and has no plans to do anything to safeguard our health. For example, on the subject of landfill gas, Section 2.5.5 paragraph 2; "The composite liner system described in Section 2.5.1 and final cover system described in Section 2.6.2 would restrict migration of landfill gas." Note; it does not say allieviate migration of landfill gas. "In addition a landfill collection system

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cont.

would be installed to control migration of landfill gas." Note: it does not say allieviate migration of landfill gas. "The landfill gas collection system would reduce potential for gas to migrate beyond the site perimeter." Note; it does not say allieviate potential for gas to migrate beyond site perimeter. Section 3.15.23 paragraph 4; "if landfill gas is not controlled it can represent a significant health and safety hazard." Section 3.15.22 paragraph 3; "Methane is less dense than natural soil air, therefore, methane in landfill gas tends to migrate upwards through the landfill cover or if the landfill cover is sealed, it tends to migrate laterally to the edges of the landfill where it again migrates upward through more permeable soil." If you seal the existing landfill with the expanded landfill above, the gases will pass out horizontally through the adjacent hillside. Our home and those of our neighbors sit right on the other side of that hillside.

You do not adequately address what is dumped into this landfill. A spot check is inadequate. It is critical that every truck be carefully examined for hazardous waste. This procedure is not carried out now, and we all fear what has already been negligently dumped in our "backyards."

Lastly, I would like to address our backyard and our livelihood that is growing in it. We have been plagued by landslides for years. A landslide in 1980 nearly took our home and orchards with it. We have committed ourselves to learning to live with mother nature. We have been fortunate in that we have been advised that the hill behind us has stabilized to a degree that we actually are confident that we will have no more major slide problems. Now you are going to start moving huge amounts of dirt behind that hill. Its stability is in jeopardy. We ask that you address this critical problem.

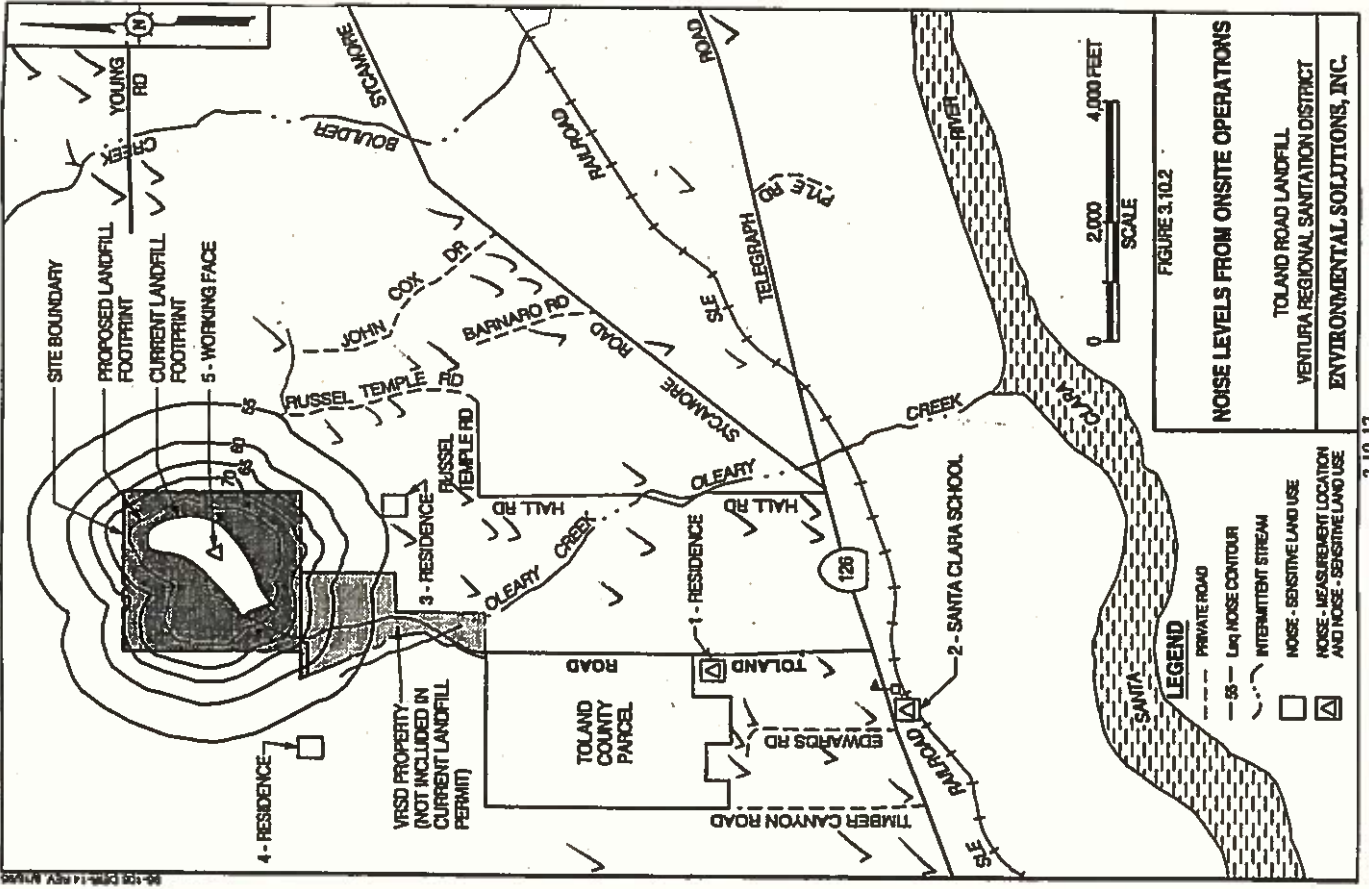
The VRSD is about to destroy a beautiful and vital part of Ventura County. Will you in the process be destroying the health of the people who live around this project? I would ask that each of you involved in this project personally promise all of us that our land, our crops, our water, our children, our elderly, our very lives are safe with your project.

Sincerely yours,

Anita Nelson
735 Hall Road
Santa Paula, California 93060

cc: County Board of Supervisors (individual copies)
Bob Laughlin, County RMA/Planning Division
Ventura County Tax Payers Association

53 Residences within a 2 mile radius



**DOCUMENT 48
ANITA NELSON
RESPONSE TO COMMENTS**

Responses 48-1

1. CEQA Guidelines lists criteria for identifying the lead agency when two or more public agencies will be involved with a project:
 - "If the project will be carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency." (Section 15051 (a))
 - "Where more than one public agency equally meet the criteria in subsection (b), the agency which will act first on the project in question shall be the Lead Agency." (Section 15051 (c))
2. Based on the criteria listed in the CEQA Guidelines, VRSD is the appropriate lead agency for the proposed project. VRSD acting as the lead agency for the proposed project is analogous to a city or county acting as the lead agency for a public works project they are implementing. Other agencies (referred to in the CEQA Guidelines as responsible agencies) will use the EIR in the process for issuance of the various permits required for the proposed project. The pertinent requirements of these agencies have been considered in the environmental analyses.
3. The EIR has been prepared by a third-party consultant with no interest in the outcome of the project.

Response 48-2

1. The location of residences on Figure 3.8.4 was based on a visual interpretation of a larger scale aerial photograph of which structures are residences and which are auxiliary agricultural buildings. Clearly, based on the local knowledge of this commenter, the interpretation was not conservative enough, and several residences were omitted from the mapping. This was due in part to a misinterpretation of buildings, and in part due to structures being masked by vegetation.
2. The omission of some of the residences within a two-mile radius of the landfill, does not however, negate the conclusions and findings of the Draft EIR. Project-related impacts on the two residences closest to the landfill, identified as No. 3 and No. 4 on Figure 3.10.2, were evaluated, and quantified when feasible. In addition, the Draft EIR provided a detailed

analysis of the potential impacts on the two residences which front on Toland Road. Due to their location on the Toland Road, these residences represent the most sensitive locations for project-related traffic impacts.

3. With the exception of project-specific noise impacts due to traffic on Toland Road, impacts to the residences most proximate to the landfill would not be significant. The installation of noise barriers adjacent to the two residences on Toland Road would mitigate noise levels at these houses to acceptable levels. Landfill operation-related impacts, including dust, noise and air emission impacts, would be less than significant at the closest residence to the landfill.
4. In conclusion, although each of the residences within a two-mile residence was not mapped, the potential project impacts to these residences have been evaluated. Project-related environmental impacts would be either equal to, or less than, the project impacts as evaluated for residences more proximate to the landfill or access road. The conclusions and findings of the Draft EIR, therefore, remain valid.

Response 48-3

1. The design and operation of the landfill gas collection system at Toland must comply with APCD Rule 74.17. Therefore, an appropriate gas collection system would be installed to assure that landfill gas migration is controlled. The control of gas migration would be demonstrated and monitored through the use of landfill gas monitoring probes and surface monitoring in accordance with APCD Rule 74.17.
2. The landfill gas collection system would be installed in both the existing waste at Toland and within the additional waste that would be disposed at the site under the proposed project. In combination with the composite flexible membrane liner that is required by state and federal regulations (i.e., CCR Titles 14 and 23, and Subtitle D) for lateral expansions of existing landfills, the landfill gas collection system would capture 85 to 95 percent of the gas generated by the landfill. The remaining 5 to 15 percent of gas not collected would tend to migrate along the contact between the liner and bedrock, it would not "...pass out horizontally through the adjacent hillside..." as suggested by this comment.
3. As discussed above, an important element of APCD Rule 74.17 is the requirement to monitor the migration of landfill gas from landfills. If landfill gas is detected migrating out of the waste prism, additional gas collection wells are required to control the migration. Under state

and federal regulations, landfill gas cannot be allowed to migrate beyond the property boundary. Therefore, the combination of the liner system, landfill gas collection system, and landfill gas monitoring system would assure that landfill gas does not migrate offsite from the proposed project.

Response 48-4

1. There are many operational procedures and regulatory requirements in place to limit the amount of hazardous waste that could inadvertently end up in municipal solid waste landfills. Under AB 939, cities are required to develop Household Hazardous Waste Elements that establishes programs to collect and properly dispose of household hazardous waste. In addition, much of the waste expected at Toland would be first processed at transfer/recycling stations where hazardous waste would be removed.
2. The routine load checking program for the proposed project was discussed in Sections 2.3.5.2 and 3.15.3.1.2 of the Draft EIR. The following routine load checking program would be followed to identify loads of suspected nonpermitted wastes:

- **Scalehouse Inspection:** Prior to entering the landfill, each waste transporting vehicle, would be inspected at the scalehouse, with the exception of transfer trucks that have been processed through a transfer station/recycling center that has a load checking procedure. Such transfer trucks would be directed to the working face.

The inspection at the scalehouse consists of verifying the waste hauler and the contents of the truck. Covered loads would be uncovered and visually inspected at the scalehouse. Personnel at the scalehouse would assess each load to determine waste type, the hauler, and direct the vehicle to the disposal area.

Loads suspected of nonpermitted waste would be directed to the holding/inspection area and a more detailed inspection conducted. If a load is rejected as a result of the inspections, VRSD would record pertinent information regarding the load and instruct the hauler to dispose of the load at an appropriate permitted facility.

- **Working Face Inspection:** For loads found to be acceptable at the scalehouse and directed to the active working face, a more detailed second inspection would occur as waste is deposited. This inspection would be conducted by specially trained staff, equipment operators, or landfill traffic controllers, with the intention of identifying, removing and documenting suspected nonpermitted wastes not discovered during the initial inspection at the scalehouse. If suspected nonpermitted wastes were identified prior to unloading, the driver would be directed to return to the scalehouse. The scalehouse would be notified of a returning load and the vehicle would be directed to the holding/inspection area for a more detailed inspection.

If the generator or hauler of the suspected nonpermitted waste was identified, they would be contacted and directed to make arrangements to have the material transported to an appropriately permitted facility. If the generator or hauler cannot be identified, VRSD staff would document the material, and arrangements would be made with a licensed hauler to identify, package, and transport the material to an appropriately permitted facility.

- **Random Inspection:** Randomly selected loads would be directed to a designated sorting area for nonpermitted waste inspection.

The above procedures are currently in place at the Bailard and Toland landfills under the jurisdiction of VRSD. No significant impacts are expected with implementation of the above operational procedures.

Response 48-5

1. As discussed in Section 3.2 of the Draft EIR, geologic trenching conducted at the site has determined that the landslides and mud flows at the site are surficial in nature and are not deep seated (Fugro, 1992; Environmental Solutions, Inc., 1995a). These surficial features would be excavated as part of the proposed project. As Toland is a canyon landfill, infilling the canyon area with waste would buttress the slopes against future failure. The geologic investigations at the site have determined that these existing surficial features would not represent a geologic hazard to the proposed project, nor would the proposed project result in geologic hazards.
2. As part of the analyses conducted for the proposed project and reported in the Section 3.2 of the Draft EIR, a seismic evaluation has been completed to determine the site peak ground acceleration (PGA) from the maximum potential earthquake event (MPE) (Environmental Solutions, Inc. 1995b). The PGA of 1.0g was used in the slope stability analyses performed to support the proposed project and it was determined that an adequate factor of safety (i.e., a factor of safety greater than 1.5) can be achieved for the proposed project. The PGA 1.0g would be used during design of the environmental controls systems (e.g., liner, LCRS, landfill gas collection system, surface water drainage) and structures on the landfill.

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NOV 5 1995

V. R. S. D.

November 5, 1995

Mr. Clinton L. Whitney - General Manager
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003-5562

Re: Response to Draft Environmental Impact Report - Toland Road Landfill
Expansion and Landfill Closure/Post Closure

Dear Mr. Whitney:

After review of the Draft Environmental Impact Report for the proposed Toland Road Landfill expansion, I have the following comments and concerns regarding Geology and Soils; Water Resources; Land Use; Traffic; and Air Quality:

3.2 Geology and Soils

With regard to the existing geologic and seismic conditions at the Toland site, I am concerned that the DEIR does not adequately address the potential for leachate occurring at the existing Toland Road Landfill and the possible migration of future groundwater and/or leachate from the proposed landfill expansion.

Section 3.2.2.1.3 of the DEIR, outlines the underlying "fold and faults" found in the local geology of the Ventura Basin (Santa Clara Syncline). Figures 3.2.3 and 3.2.4; and Table 3.2.1 clearly show the relationship of various geologic formations and active "major" fault lines adjacent to the Toland Road Landfill site. Although the DEIR makes general reference to the Toland site undergoing regional subsidence, faulting and seismicity, no specific mention is given to Toland's close proximity to the active Culbertson Fault (inference is drawn but not specifically noted on Figure 3.2.4 and is not even shown on Figure 3.2.6 that identifies Active and Potentially Active Faults within 100 KM of the Toland Road Landfill). In the previously mapped Rockwell (1982) and Dibbles (1990) studies, the location of the Culbertson Fault was identified immediately adjacent to the existing landfill.

Because the DEIR has excluded the potential impact of the Culbertson Fault, I have serious concern over the potential of this fault being a potential "conduit" for leachate migrating through the underlying fractures as well as the on-going subsidence of the structural geology around this fault. The possible contamination of underlying groundwater resources adjacent to the Culbertson Fault is of obvious concern and needs to be adequately addressed in the EIR process.

The Culbertson Fault is also significant to the Toland Road Landfill because of the Porter-Cologne Water Quality Act. The EIR process should address that this particular Act prohibits landfill expansions within 200 ft. of active or potentially active faults. As noted above, the Rockwell and Dibbles maps clearly show the close proximity of the Culbertson Fault to the Toland Road Landfill.

Toland Road Landfill- Review of DEIR
Page 2

For the above reasons, I feel that the existing geologic and seismic conditions pose a significant adverse impact on the proposed project, and that the level of their significance is very high.

3.3 Water Resources

I am concerned that the DEIR does not find any potential impacts on water quality. Under the subsection "Potential Impacts" for Water Resources in the Summary of Impact and Mitigation Measures, Table 1.1 DEIR 1.3.2(2), the possible contamination of local or regional aquifers is not even mentioned. I feel that the DEIR process has inadequately addressed the following issues related to possible groundwater contamination:

- The water quality data obtained from two on-site monitoring wells and three off-site ground water wells is inadequate for detection of potential groundwater contamination in the vicinity of the landfill. In Section 3.3.2.2.1(2), it is noted that "organic analyses indicates that the ground water in the Pico Formation under the site has not been affected by the landfill." According to recent findings that have been documented by Unified Water Conservation District (UWCD), volatile organic compounds (VOCs) have in fact been detected in underlying Pico Formation well samplings. This contradiction of findings raises the issue of whether leachate from the existing landfill has already contaminated the local groundwater. I feel it is irresponsible of the DEIR process to reach conclusions on hydrogeology with inadequate well analysis. I concur with UWCD's endorsement for additional monitoring wells that would help verify the extent of existing groundwater and gas contamination prior to any further evaluation of the landfill's expansion.
- In Section 3.3.2.2.2 reference is made to various surface water seeps. As documented by UWCD, these seeps are of concern because of the potential intrusion of water into the sidewalls of the landfill and because of the high levels of detected metals sampled by UWCD; ref. 3.3.2.2(5). According to documentation by UWCD, inadequate supporting evidence has been provided by VRSD on the potential source of these surface water seeps. Because of the concern voiced by UWCD over the seep issue, I feel further VRSD analysis is required to assure that leachate has not already seeped to portions of the bedrock formation below the existing landfill site.
- In Section 3.3.3.1.1 reference to the potential for leachate "squeezing" is considered to be limited due to the "expected" moisture content of the existing and proposed waste/cover prism. In addition to the existing field capacity of the waste/cover prism, the DEIR proposes a liner system and LCFS that would be used to collect "small amounts of leachate."

The weight of the new landfill over the existing waste currently in place at Toland will exert tremendous downward pressure. The DEIR does not adequately address the increase in the potential for a leachate problem due to "squeezing" in addition to potential impacts such as subsidence. If the proposed liner system ruptures over the existing waste/cover prism due to subsidence how would VRSD propose to mitigate the potential impact on water quality?

Because of the above reasons, I feel that the proposed project would result in significant and adverse impacts on future ground water quality, and the level of their significance on the project should be considered very high.

3.8 Land Use

With regard to the Cumulative impacts from adjacent land uses briefly noted in Section 3.8.4, I am concerned that the DEIR does not adequately identify or quantify the actual impacts on cumulative traffic and air quality issues from the following projects.

- Sycamore Ranch Quarry**

This project is only briefly mentioned in Section 3.8.4(1), and the context in which it is noted is somehow blended into a discussion on the "minimal land development" demonstrated by a nearby "ranchette" subdivision that would not "have the potential to result in cumulative land use impacts in conjunction with the proposed project." I am very concerned that the DEIR has completely glossed over a potential cumulative impact of the Toland and Sycamore Ranch projects; a potential impact that would affect future air quality, traffic, noise, visual, and biological pest and flood control. The S.P. Milling project seeks approval to mine sand and gravel from 128 acres south of Sycamore Road and north of Hwy. 126 for up to 30 years. As publicly noted in recent environmental report review meetings held at the County of Ventura Government Center, the Sycamore Ranch strip mining proposal has significant airborne dust impacts that cannot be adequately mitigated. The potential cumulative impact on Pest Management within the surrounding agricultural environment is significant along with the potential cumulative impact of toxic air emissions from both projects. This concern over air emissions is significant because of the cumulative truck traffic on Highway 126. It has been documented that during operational hours the proposed Sycamore Ranch project will have aggregate hauling tandem trucks running on Highway 126 at intervals of 1 minute - 15 seconds. The impact of these aggregate trucks with the inclusion of commercial waste hauling vehicles would generate potential traffic volumes on Highway 126 that should be considered highly significant. With or without signalization at the Toland Road/Highway 126 intersection, with or without a "statement of overriding consideration," the methodology used in the DEIR's traffic study should take into account the cumulative impact of potential truck traffic from the S.P. Milling site.

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- Santa Clara River Valley "Heritage Trail"**

As the consulting architect and planner hired by the City of Santa Paula for the redevelopment of their historic Downtown, I am concerned that the DEIR does not address the on-going efforts of other public agencies in the redevelopment of the Santa Clara Valley into a regional tourist destination. With the recent joint agency acquisition of the 32-mile Southern Pacific rail line that extends from Ventura through to Piru, a major recreational and tourist attraction is currently being developed that has direct impact on the Toland Landfill site. Having a major landfill on the same route that will be traveled by tourist and recreational vehicles will potentially set up a worst case scenario where tourist trains will be regularly crossing Highway 126 during periods when trucks are regularly crossing tracks in route to the landfill, and the potential will also be set up for additional major accidents along Highway 126 due to the increased recreational tourist traffic. Because of the significant and adverse impacts that this project will have on traffic volumes on Highway 126, I feel that the EIR process should address the master plan for the 32-mile rail line in addition to the generated traffic and peak hour traffic volumes outlined in Section 3.11.3.1 - Proposed Operations. Because this joint agency venture is currently in the design phase, I suggest that an overview of the "Heritage Trail" project be obtained from Ms. Marty Robinson with the Chief Administrative Office at the County of Ventura, and that specific project information can be obtained from the City Managers of both Santa Paula and Fillmore. To obtain data on the current number of tourist trains now running between Fillmore and Santa Paula as well as the projected number of tourist trains being planned in the coming months; call Jim Clark, Vice President and Operations Manager for Short Line Enterprises, Inc. (805) 524-0330.

3.12 Air Quality

With regard to the above mentioned concerns over the potential volume of truck traffic to and from the Toland Landfill, I am particularly concerned about the DEIR's inadequate analysis of off-site mobile emissions from diesel trucks. Tables 3.12.9 and 3.12.11 do not provide emission data specific to diesel fuel versus gas fuel. Diesel emission solids are a known toxic by-product of truck exhaust and should be adequately evaluated in the EIR process. Specifically an evaluation should be made on the impact diesel emission solids will have on adjacent agricultural land. Because of the heavy airborne particulate matter in diesel emissions, there is a serious concern over the cumulative affect these emission solids have on citrus and avocado growing areas in close proximity to diesel truck traffic. The EIR should also address the potential impact that diesel and rubber solids will have on the surface of Toland Road; mixed with water and/or black ice, safe truck braking could be difficult at the steeply inclined stop at the bottom of Toland Road and Highway 126.

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CONT.

The Onsite Source Emissions addressed in Section 3.12.3.2.1 should specifically address the impact of diesel truck emissions modeled to the topography of Toland Road. Because of the steep grade of this access road, diesel emissions should take into account climbing and braking diesel engine data. I suggest that VRSD and the company which prepared the DEIR (Environmental Solutions, Inc.), make a site visit to Toland Road to see first hand the amount of visible emissions belching out of trash trucks currently "pulling" up the Toland Road grade. Because of the operational reality of trucks waiting in-line to enter the landfill site, an onsite source of truck emission should also take into account idling diesel engine data adjacent to the landfill entrance. I feel that the quantity of all these diesel emission solids will have a significant and adverse impact on air quality and adjacent agricultural land. The level of their significance on the project should be considered very high.

Finally, I believe that we all must work together in finding solutions for our waste disposal dilemma in Ventura County. Working together means taking his/her obligation to recycle cans and bottles, plastic, cardboard, yard prunings, and such toxic wastes as motor oil, paints, chemicals, etc.. We have a duty to keep our County as livable and as beautiful as when we first moved here. I know my wife and I are committed to doing our part, and it is becoming obvious that our fellow citizens are likewise committed because we are reducing the overall amount of trash in this County and thus reducing the very need for more landfills.

The Santa Clara River Valley is the last historically intact agricultural valley of its kind in Southern California. It is still one of the most favored and livable spots in all of Ventura County. It is about to become a valuable "clean" resource for attracting tourist dollars with the development of the "Heritage Trail" along the newly acquired historic rail line between Piru and Ventura. We can not afford to screw this up for either ourselves or our children. We have to truly appreciate the "vision" of what this valley wants to look like in ten, twenty or a hundred years.

Sincerely yours,



Doug Nelson
735 Hall Road
Santa Paula, California 93060

cc: County Board of Supervisors (individual copies)
Bob Laughlin, County RMA/Planning Division
Ventura County Tax Payers Association

**DOCUMENT 49
DOUG NELSON
RESPONSE TO COMMENTS**

Responses 49-1

1. Regarding the Culbertson Fault, extensive trenching was conducted at Toland to determine if the fault is on the site (Fugro, 1992). As discussed in Section 3.2.2.7 of the Draft EIR, Fugro concluded and Rockwell agreed that the Culbertson Fault is not located on the project site. Additionally, work conducted by Kahl (1985) for the California Department of Mines and Geology (CDMG) concluded that the Culbertson Fault does not extend onto the Toland site.
2. Section 3.2.2.7 and Figure 3.2.9 of the Draft EIR discuss and show the relationship between the Orcutt and Culbertson faults with regard to the proposed project. In addition, the geologic trenching and investigation conducted by Fugro (1992) and the *Focused Geologic Investigation* conducted by Environmental Solutions, Inc. discussed the finding that the Culbertson Fault does not extend onto the project site (Environmental Solutions, Inc., 1995a). The conclusion drawn from the above references indicate that no Holocene faults have been identified within 200 feet of the proposed project. Therefore, the proposed project meets the landfill site criteria regarding Holocene age faults included in CCR Title 23 and Subtitle D.
3. The *Faulting and Seismicity Technical Report* (Environmental Solutions, Inc. 1995b) prepared for the proposed project and summarized in Section 3.2 of the Draft EIR includes a detailed discussion of the following:
 - Project area and project site specific tectonic setting.
 - Project area and project site specific faulting and seismicity, including identification of the near-field and far-field controlling faults for the site.
 - Project area and project site seismic hazards.
 - Slope stability and landfill deformation analyses for the proposed project, including static stability analyses, pseudo-static stability analyses, one-dimensional dynamic site response analyses, and seismically-induced deformation analyses.
4. As detailed in the *Faulting and Seismicity Technical Report*, and as summarized in Section 3.2 of the Draft EIR, the seismic analyses conducted for the proposed project were based on data for faults within a 100 kilometer radius of the site. This radius was selected to include the potential effects of major near-field faults (e.g., San Cayetano and Oak Ridge) and regional far-field faults (e.g., San Andreas, White Wolf, Sierra Madre-San Fernando, and Newport-

Inglewood). The data for the analyses include recent publications on faulting and seismic activity in the Ventura and Los Angeles basins, including published data regarding the January 1994 Northridge earthquake. The seismic analyses conducted for the proposed project were based on a probabilistic analysis to determine the site-specific peak ground acceleration (PGA) for the 100-year and 2,400-year return period ground motion as required by CCR Title 23 and Subtitle D, respectively, and were based on the maximum potential earthquake (MPE) for the faults within the 100-kilometer radius.

5. As discussed in Section 3.2 of the Draft EIR, the analyses conducted for the proposed project determined that a PGA of 1.0g from the MPE could affect the site. The analyses also determined that the proposed design for the expansion of Toland (i.e., excavation and fill plans, and base liner system) would result in stable landfill slopes under static and seismic conditions (Environmental Solutions, Inc., 1995b).

Response 49-2

1. As indicated in the comment, volatile organic compounds (i.e., PCE and TCE) were detected in a ground water sample obtained from the onsite "Replacement" well in April 1992, however, this well has not been subsequently sampled due to insufficient quantity of ground water in the well. Because of the lack of ground water for sampling and additional analytical analyses, it has not been determined if the detection of these constituents is representative of ground water conditions or if they are a result of field or laboratory contamination. Additionally, the detected concentrations are relatively low (4.5 µg/L for PCE and 1.8 µg/L for TCE) and below the respective state and federal maximum contaminant levels (MCLs).
2. In accordance with CCR Title 23, Chapter 15 and the waste discharge requirements (WDRs) for Toland, the April 1992 ground water data was provided to the RWQCB as part of the quarterly and annual ground water report for Toland. As discussed in Sections 2.5.4 and 3.3.5 of the Draft EIR, a ground water monitoring system would be developed for the proposed project in accordance with CCR Title 23, Chapter 15, Article 5 in consultation with the RWQCB as part of the revised WDRs for the project.

Response 49-3

1. The basis for the United Water Conservation District's (UWCD's) issues with the findings of the *Investigation of Surface Water Seeps in the Vicinity of the Toland Road Landfill Ventura*

County, California (Environmental Solutions, Inc., 1995d) reflect a difference of technical interpretation of the geologic data. Based on the results of the geologic field study accomplished as part of the investigation of the surface water seep and body of geologic data for the project area, we stand behind the findings included in the Draft EIR regarding the surface water seeps.

Response 49-4

1. The proposed project consists of both a vertical and lateral expansion of Toland. The vertical expansion component of the proposed project includes the placement of additional waste on top of waste already landfilled at the site. Vertical expansions of existing landfills are allowed by state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) without a requirement to excavate previously landfilled waste to allow the installation of a composite liner system. Lateral expansions of existing landfills are required by state and federal regulations to include a composite liner system. Therefore, based on state and federal landfill regulations, the proposed project includes a composite liner for the lateral expansion component of the project.
2. As discussed in Section 2.5.1 of the Draft EIR, for the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot-thick low permeability intermediate soil barrier would be installed. Incorporated with the intermediate soil barrier is a landfill gas collection system, and leachate collection and removal system. The design of the intermediate soil barrier system shall take into account the overburden weight of the new waste and shall account for any settlement that may occur.
3. The intermediate soil barrier to isolate the existing waste from the new waste is not required by state or federal landfill regulations for vertical expansions, however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.
4. In addition, as discussed in Section 3.3 of the Draft EIR, based on the geologic and hydrogeologic conditions at Toland, and the landfill regulatory requirements included in CCR Titles 14 and 23, and Subtitle D (e.g., composite liner system, landfill gas collection system, leachate collection and removal system, etc.) the proposed project would not impact ground water quality.

Response 49-5

1. The Draft EIR for the S.P. Milling Company's Sycamore Ranch Mining and Reclamation Plan (Sycamore Ranch) was being developed concurrently with the preparation of the Draft EIR for Toland. Detailed information on this project, was therefore, not available to include in the Draft EIR for Toland. The following information and review of potential cumulative project impacts by topical area is provided to respond to this comment. Data on the Sycamore Ranch project is based on the Draft EIR for Sycamore Ranch dated August 1995:

- Air Quality

NO_x emissions associated with onsite operations (58 lbs/day, worse case) and offsite delivery (202 lbs/day, worse case) for Sycamore Ranch would exceed the APCD significance threshold of 25 lbs/day and would, therefore constitute a significant project impact. In comparison, as discussed in Section 3.12.3 of the Draft EIR, onsite emissions for landfill operations at Toland would not represent a net emission increase to the County's baseline emissions inventory included in the AQMP as the emissions are shifted from Bailard to Toland. In addition, the air quality analysis for Toland determined that the onsite emissions would not exceed state or federal ambient air quality standards at or beyond the project boundary, therefore, onsite emissions at Toland do not represent a significant impact.

As discussed in Section 3.12.3 of the Draft EIR, offsite mobile emissions associated with waste transport to Toland under the "worse case" traffic scenario would exceed the NO_x and ROG thresholds. Since the County is nonattainment for ozone, both projects would individually and cumulatively have a significant impact on regional air quality.

Sycamore Ranch is anticipated to emit more than 2,200 pounds of PM₁₀ per day from the excavation of aggregate and materials, and haul truck trip exhausts. PM₁₀ emissions for Toland include the generation of 35 lbs/day from mobile emissions (under the "worse case" traffic scenario) and 79 lbs/day from onsite landfill operations. Since the County is currently in nonattainment of the state PM₁₀ standard, both projects contribute to a significant regional impact for this pollutant.

To offset the PM₁₀ generated by the proposed project at Toland, the following two additional mitigation measures have been included in the EIR:

- A wheel washing station shall be installed onsite.
- VRSD shall pave, or pay the cost to pave, unpaved roads (e.g., approximately 27,500 linear feet based on the "worse case" traffic scenario) in the vicinity of Toland.

In combination with the other PM₁₀ mitigation measures included in the EIR (see Table 1.1 of this Final EIR) the potential impacts of the PM₁₀ emissions from Toland would be offset and Toland would not represent a cumulative significant impact in conjunction with Sycamore Ranch.

Neither Sycamore Ranch or Toland exceed the ambient air quality standard threshold for SO_x. In addition, since the County is an attainment area for this pollutant, the cumulative project impact for this constituent would not be significant.

- Traffic

Both the Sycamore Ranch and Toland projects would contribute additional traffic to Highway 126 west of Fillmore. For this stretch of the highway, the roadway is four lanes (two lanes in each direction). Neither project would add traffic east of Fillmore where portions of the Highway 126 are only two lanes. It is estimated that the Sycamore Ranch project would generate an average of approximately 144 trips per day which would be transported via Highway 126 westerly to a El Rio processing plant (west of Highway 118). Under the "worst case" traffic scenario for Toland (as described in the Draft EIR), the proposed project would generate 450 trips per day on Highway 126 between Toland Road and Highway 101. Combined, the two projects would add approximately 600 ADTs to Highway 126, equivalent to 2.8 percent of this roadways existing traffic. Under existing conditions with the addition of these two projects, the highway would continue to operate at an acceptable LOS of "B."

Assuming the "worse case" traffic scenario for Toland, the combined projects would constitute approximately 1.6 percent of the projected traffic Highway 126 traffic in 2015 (based on Caltrans projection of 37,600 ADTs). As discussed in the Toland Draft EIR, the Caltrans projection conservatively represents growth in the adjacent areas as well as increases in through traffic. This projection sufficiently encompasses the incremental addition of the Sycamore Ranch project-related trips. Since the trips generated from this project would represent "through" traffic at the Toland Road/Highway 126 intersection, the affect of the additional traffic at this intersection is included in the cumulative assessment in the Draft EIR. Since Toland would not generate additional traffic east of Toland Road, the proposed project would not affect turning movements associated with access to the Sycamore Ranch project site. As concluded in the Draft EIR, cumulative non-Toland related traffic impacts on Highway 126 represent a significant, unavoidable impact.

- Noise

Based on the County's noise ordinance, outdoor noise levels should not exceed a 1-hour Leq of greater than 55 dBA (between 6:00 a.m. and 7:00 p.m.) The Sycamore Ranch and Toland projects are located approximately 1.7 miles apart (i.e., 9,000 feet). Noise levels due to Sycamore Ranch would be approximately 58 dBA at 2,000 feet from the mining operation. As shown on Table 3.10.6 of the Toland Draft EIR, noise level from landfill operations would be approximately 55 dBA at approximately 1,320 feet from the working face. Noise from onsite operations for the two projects, therefore, would not combine to result in cumulatively significant impacts to surrounding receptors.

The potential cumulative noise impact associated with the projects would, therefore, be the noise affect of the combined truck traffic on Highway 126, west of Toland Road. The cumulative noise analysis is based on the future ADTs of 37,600 trips for Highway 126, including 8 percent truck traffic. The noise increases for this portion of the highway as modeled in the Toland Draft EIR conservatively account for the Sycamore Ranch truck traffic. As discussed in Section 3.10.8 of the Draft EIR, impacts of existing and future cumulative traffic noise levels on Highway 126 would be significant with or without the proposed Toland project.

- Visual

Based on the Draft EIRs for the respective projects, as mitigated, visual impacts, for neither Toland or Sycamore Ranch would be significant. In addition, due to the distance between the project sites, and the intervening topography, visual impacts of the two projects do not have the potential to combine to result in a more substantial impact.

- Biological Pest/Agricultural

Both the Toland and Sycamore Ranch projects include mitigation measures to offset potential adverse impacts on surrounding agriculture. Of primary concern is the potential affect of fugitive dust (PM₁₀). Mitigation for Sycamore Ranch includes washing onsite and adjacent fruit trees to remove dust, implementation of a dust control program, and before-and-after mining monitoring program for both dust and its potential biological effects.

Section 3.8.3.2.2 of the Toland Draft EIR provides an analysis of the potential project-related PM₁₀ impacts on orchards in the vicinity of the landfill. Based on the analysis, fugitive dust from the proposed project would not have a significant impact on surrounding agriculture. As discussed above (i.e., air quality), two additional mitigation measures have been included in this Final EIR to assure that PM₁₀ from onsite operations and offsite mobile are offset. The proposed projects, would therefore, not combine to result in cumulative, air-quality related, significant impacts to agriculture.

- Flood Control

Although both Toland and Sycamore Ranch could have the potential of increasing surface water run-off, stormwater control improvements for each project would retain the runoff onsite, and no impact on offsite peak runoff would result. Sycamore Ranch includes the construction of a water storage basins (an interim basin in Phase 1, and a permanent basin in Phase 2) to hold runoff from incident rainfall and water from mining operations. For Toland, a detention basin, approximately 250 feet by 150 feet and 10 feet deep, would be constructed to accommodate stormwater. The capacity is based on the volume of stormwater that could flow from the Toland site during the 100-year, 24-hour storm event. The two projects, therefore, would not result in cumulatively, significant flood control impacts.

Response 49-6

1. This comment states that Santa Clara River Valley "Heritage Trail" constitutes a "...major recreational and tourist attraction [which] is currently being developed that has direct impact on the Toland Landfill site." With the exception of potential traffic-related impacts, the comment does not specify the direct impacts of this project on Toland (or of Toland on the tourist attraction). In addition, the elements of the proposed attraction are vague. To properly evaluate the potential cumulative impacts of this "project," it would be necessary to have a

project description. This is generally provided in the CEQA documentation required for such a project. Since at this time, there is neither a formal description of the project, or available environmental documentation, it would be difficult to assess potential cumulative impacts related to the "Heritage Trail."

2. Notwithstanding the difficulty in assessing the "Heritage Trail" project, this response will address the issues raised by this comment. The landfill is located approximately two miles from Highway 126. Opportunities along the train route to view the landfill would be rare. Photographic simulations as shown for Viewpoints Nos. 1 and 2 in Figures 3.9.3 and 3.9.4 of the Draft EIR, respectively, would be representative of potential views from the railroad. As shown, particularly from this distance, the landfill would not distract from the surrounding agricultural character of the area.
3. The proposed Toland project would not affect future tourist trains crossing Highway 126. While there are two train crossings east of the terminus of the freeway portion of Highway 126 east of Santa Paula, one of these crossings is east of Toland Road. Since Toland would not generate additional traffic east of Toland Road, it could not increase the potential for accidents at the crossing east of Toland Road. Under the "worse case" traffic scenario for the proposed project (waste transport by packer trucks), landfill-related traffic would represent approximately 2.3 percent of the future ADTs on Highway 126, west of Toland Road. This contribution to future traffic would not significantly impact the train crossing near Santa Paula, or tourists who may travel on Highway 126. For both existing and future conditions, a high percentage of the traffic on this arterial is truck traffic (i.e., 11.5 and 8.5 percent, respectively). The proposed project, therefore, would not alter the character of traffic along this roadway.

Response 49-7

1. Emission factors for vehicle exhaust used in the Draft EIR are based on the most recent version (EMFAC7F1.1) of CARB's computer model. Inputs used in the model include type of vehicle, fuel, speed, control technology (e.g., catalytic), ambient temperature, and year (up to 2020 is available). These emission factors, the most detailed available, were selected for purposes of the Draft EIR for heavy-duty diesel trucks traveling at 25 mph on Toland Road.
2. CARB confirms that specific emission factors have not been developed to simulate trucks ascending and descending grades (CARB, 1995), therefore, increased emissions associated

with trucks ascending Toland Road are considered to be included in the standard emission factors from CARB. The potential significance of these emissions and resulting ambient concentrations is interpreted by reference to state and federal ambient air quality standards. These standards were developed to protect human health with an adequate margin of safety, and are concentrations averaged over time periods that vary from one hour to one year. These averaging times remove much of the detailed variability that exists in emission sources, especially in mobile sources with engine loading that varies continuously based on factors such as accelerator position and road grade.

3. The comment requested that the Draft EIR address the potential combined effect of rubber solids/diesel emission by-products on Toland Road from waste haul trucks and the potential safety hazards if mixed with water or black ice. The combination of rubber solids/diesel emission by-products would reduce the potential for black ice to form as the freezing point is lower than for water alone. In addition, there are only limited occasions in which freezing temperatures would occur in the vicinity of the site (average of six times a year per Table 3.8.4 of the Draft EIR). There are no recorded incidents regarding trucks losing control while traveling down Toland Road due to water and/or ice on the roadway. An increase in truck traffic would not increase the potential for this to occur, therefore, no significant safety impacts would be expected under the proposed project.
4. The carbon monoxide (CO) analysis has been revised to include the estimated maximum waiting time for vehicles making the left-turn from Highway 126 onto Toland Road, as well as the estimated maximum waiting times for the other turning movements at this intersection. Under existing conditions, plus the proposed project, an average delay of approximately 7 seconds for left turn movements from Highway 126 onto Toland Road is estimated (WPA, 1995). This does not represent a significant increase over the approximately 6-second delay currently experienced by vehicles at this intersection. Under buildout cumulative conditions in 2015, which include all sources of traffic, average delays of 19 seconds are estimated for the left turns from Highway 126 onto Toland Road (WPA, 1995).
5. As shown in Revised Table 3.12.12 (see Section 3.2 of this Final EIR), the maximum CO concentrations associated with the proposed project would be 0.8 and 0.6 parts per million by volume (ppmv) for the 1-hour and 8-hour averaging times, respectively. When added to the background CO concentrations of 5.1 and 2.6 ppmv for the 1-hour and 8-hour average,

respectively, the proposed project would not exceed the ambient air quality standard for CO (see Revised Table 3.12.12). Therefore, the revision of the CO analysis does not alter the findings or conclusions of the EIR.

MaryAliceOrcuttHenderson

1158 Woodland Drive
Santa Paula, California 93060
(805) 525-1297

November 6, 1995

RECEIVED

NOV 07 1995

V. R. S. D.

Clinton L. Whitney, General Manager
Ventura County Regional Sanitation District
1001 Partridge Drive, Suite #150
Ventura, California 93003-5562

Re: Toland Landfill Expansion

I am totally opposed to the proposed expansion for these obvious and oft-repeated reasons:

impacts on:
the area's air quality;
the subsurface water quality
detrimental effects to:
the school's standard of safety;
the highway's traffic flow;
the ambient level of quiet associated with a classroom
clamorous and unanimous opposition from:
neighbors;
neighborhood;
neighboring cities

1

MaryAliceOrcuttHenderson

P.S.

Family owned lemon and avocado ranch is within a two-mile radius of Toland.

**DOCUMENT 50
MARY ALICE ORCUTT HENDERSON
RESPONSE TO COMMENTS**

Response 50-1

1. The commenter's opposition to the proposed project is noted. The potential impacts to water quality, air quality, health and safety, traffic, and noise associated with Toland were evaluated in detail in the Draft EIR (see Sections 3.3, 3.12, 3.15, 3.11, and 3.10, respectively). As summarized in Section 1.3.2 of the Draft EIR and as discussed in detail in the topical sections of Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

2. CEQA provides authority to approve a project which may result in significant unavoidable environmental effects. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impacts.

RECEIVED

OCT 10 1995

V. R. S. D.

Oct. 29, 1995
14230 Pinkerton Rd
Santa Paula, Ca.

Dear Sirs:

I strongly oppose the expansion of Island Road landfill.

No doubt you have a problem concerning disposal, however it is poor judgement to try to solve one problem by creating even greater problems.

I trust you can make some wise decisions to solve the original problem.

Sincerely,
Betty Pinkerton

**DOCUMENT 51
BETTY PINKERTON
RESPONSE TO COMMENTS**

Response 51-1

1. The commenter's opposition to the proposed project is noted. The potential impacts to water quality, air quality, health and safety, traffic, and noise associated with Toland were evaluated in detail in the Draft EIR (see Sections 3.3, 3.12, 3.15, 3.11, and 3.10, respectively). As summarized in Section 1.3.2 of the Draft EIR and as discussed in detail in the topical sections of Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

2. CEQA provides authority to approve a project which may result in significant unavoidable environmental effects. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impacts.

701 E. SANTA PAULA ST.
SANTA PAULA, CA 93060-2063
(805) 525-1470

RECEIVED

NOV 1 1995

V. R. S. D.

October 30, 1995

Ventura Regional Sanitation District
1001 Partridge Dr. Suite 150
Ventura, CA 93003-5562

Attention: District Manager:

Subject: DEIR Toland Landfill, No. 95031009

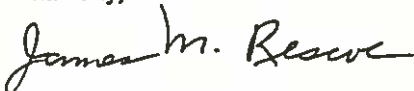
Good Morning::

You're being robbed and so are we, the people of Ventura County. There have been two meetings in Santa Paula purporting to solicit input for the DEIR. So far as I can tell no effort has been made to address, let alone mitigate, prior to the October meeting, many of the adverse impacts delineated in the September meeting.

This so called "Draft Environmental Impact Report" might be better described as a "Dastardly Example of Improper Research". The document is quite obviously an attempt to justify a political decision with some pseudo-technical gobbledegook. We in Santa Paula are, unfortunately, becoming inured to being Second Class citizens of Ventura County; we recognize that we have neither the votes nor wealth required for political clout, but this charade has gone too far.

If there is an actual need for additional waste disposal facilities for Ventura County, there appear to be much better alternatives than the proposed expansion of the Toland Landfill. A re-assessment of the current and probable future requirements is needed before you proceed with this plan. A much more thorough assessment of Environmental Impacts and their Mitigation will be required if you single-mindedly proceed on your present course.

Sincerely,



James M. Rescoe

cc: County Board of Supervisors
Maggie Kildee, Chair
John Flynn
Susan Lacey
Judy Mikels
Frank Schillo

Santa Paula Times
Ventura County Star

**DOCUMENT 52
JAMES M. RESCOE
RESPONSE TO COMMENTS**

Response 52-1

1. This commenter's opposition to the proposed project and Draft EIR are noted. The commenter does not specify the impacts identified during the Santa Paula meetings which he believes have not been addressed in the Draft EIR. It is, therefore, not possible to provide a response.
2. The need for the proposed project is documented in Section 1.2.2 of the Draft EIR. The estimated 1,500 tpd waste to be disposed at Toland under the proposed project is based on waste disposal projections included in the SRREs for the County and its cities served by VRSD. The projections assume compliance with the state-mandated requirement of 50 percent waste diversion by 2000 (AB 939). AB 939 not only establishes mandatory reductions in the volume of solid waste being landfilled, but also requires counties to demonstrate 15 years of landfill capacity for residuals.
3. The County-documented shortfall in landfill capacity is confirmed by a recent CIWMB report which lists Ventura County as one of twenty-one counties statewide which has less than 15 years remaining disposal capacity (CIWMB, 1995). As further discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion program implemented under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County only has nine years of remaining landfill capacity (County, 1995a). The County is required to demonstrate disposal capacity, and a reassessment of landfill capacity is not needed before proceeding with the proposed project.
4. The alternatives analysis in Chapter 4.0 of the Draft EIR is comprehensive, objective, and meaningful. Thirty-two project alternatives were evaluated including the alternatives identified in comprehensive siting studies previously conducted by the County and by VRSD. The analysis included the following:

Alternative	Number Evaluated
In-county landfills (waste transport by truck)	1
Out-of-county (waste transport by truck)	4
Rail-haul alternatives	4

Alternative	Number Evaluated
Offsite alternative location (within County)	20 ⁽¹⁾
Resource Recovery	1
Reduced Project	1
No Project	<u>1</u>
	32

- (1) Comparative impact analysis of top 20 sites identified in previous siting studies (VRSD Siting Study, CoSWMP, and Weldon EIR).

577 Hall Rd.
Santa Paula, CA
Nov, 5 1995

Ventura Regional Sanitation District
1001 Partridge Dr. Suite 150
Ventura, CA 93003

I would like to let you know as a home owner, registered nurse and mother of four children, I'm opposed to the extension of Toland landfill. After considerable thought my main objection is the increase of potential accidents it would cause with slow trucks turning right on to 126 from Toland road. I have seen far too many accidents on 126. As my children ages 7,9,12 and 13 reach that driving age. I would not like to see them as statistics because of their inexperience. We go westbound often from Hall road so they would have to be cautious to accelerate when turning right from Hall road to 126 because of oncoming traffic, then slow down .5 mile later for slow moving dump trucks. Inexperienced teenage boys on highways are one of our nations nightmares lets not add another reason why accidents happen on 126 .

c.c. Maggie Kildee

Sincerely,

Alice B. Romero RN

Alice B. Romero RN

Also every April the cliff swallows nest on our property. It is a joy to watch them make their nest with mud. They leave in August. It would be a shame to have them not come anymore.
AR

**DOCUMENT 53
ALICE B. ROMERO
RESPONSE TO COMMENTS**

Response 53-1

1. This commenter's opposition to the proposed project is noted.
2. The safety concerns expressed by this comment are not limited to Highway 126, or to the stretch of this highway between Hall Road and Toland Road. Traffic entering and exiting a highway at any intersection, and the necessary vehicle acceleration/deceleration associated with these movements, inherently pose potential accident hazards. Also, as noted by this comment, the situation can be aggravated by slower moving truck traffic.
3. The existing acceleration and deceleration lanes at the Toland Road/Highway 126 intersection meet Caltrans highway design standards. The design standards, and methodologies to evaluate intersection operation, have been developed both to optimize traffic flow and safety. In addition, based on their review of the traffic study for the proposed project, Caltrans and the County Department of Transportation have not identified hazardous conditions at the intersection.
4. Intersection improvements as recommended by Caltrans would further mitigate potential traffic-related safety issues at the Toland Road/Highway 126 intersection. These improvements include the installation of an intersection control flashing beacon, intersection lighting, and warning signs (see Comment Letter 02). These improvements are included in the EIR as mitigation measures.

Response 53-2

1. As stated in Section 3.4, the impact to wildlife habitat from the proposed project would be limited. Moreover, the limited potential impacts to wildlife habitat would only occur within the proposed project site. No impacts are expected to wildlife habitat, such as that utilized by the cliff swallows, located outside the site boundaries.

801 Encino Place
 Santa Paula, CA
 November 3, 1995

RECEIVED

Ventura Regional Sanitation District
 1001 Partridge Drive
 Ventura, CA 93003

NOV 07 1995

V. R. S. D.

Dear Sirs:

I object to expansion of the Toland Dump for several reasons ie. air pollution from increased traffic as well as from the increased amount of materials added to the dump, ground water pollution from those materials and the threat to agriculture from these sources. Your plan for the site would change the air flow patterns and have a deleterious effect on this agricultural valley.

①

Instead of spending money on ER's ("figures don't lie but liars figure") the District should be exploring increased recycling efforts as well as educating the public as to recyclables.

②

Finally, I find it very strange that when a survey was made to locate possible dump sites to take over after the Bailard landfill reached capacity the Toland site was at the bottom of the list as to preferability. What accounts for this giant leap to first place?

③

Yours truly,

Janette H. Romney
 Janette H. Romney

CC Maggie Kildoe .
 Susan Lacey
 John Flynn
 Judy Mikels
 Frank Schillo

2.5-127

**DOCUMENT 54
JANETTE H. ROMNEY
RESPONSE TO COMMENTS**

Response 54-1

1. The commenter's opposition to the proposed project is noted. Potential project-related impacts to agricultural uses in the Santa Clara Valley are addressed in Section 3.8.3.2.2 of the Draft EIR. Included in the analysis are potential impacts due to changes in the frequency and severity of frosts, the impacts of increased fugitive dust on orchards, and the potential increase in pests. Based on the analysis in the Draft EIR, the proposed project would not have a significant impact on agricultural operations in the vicinity of Toland and, therefore, would not affect the marketing success or viability of this industry in the County.
2. As discussed in Section 3.3 of the Draft EIR, the proposed project would not result in significant impacts to ground water quality in the area.
3. Air quality impacts associated with the proposed project were addressed in Section 3.12 of the Draft EIR. As discussed in the Draft EIR, air emissions associated with the proposed project would be accompanied by corresponding emissions reductions at Bailard as landfilling operations shift to Toland. Therefore, on a County-wide basis, air emissions associated with the proposed landfill operations and onsite equipment at Toland would not represent a significant emissions impact.
4. Notwithstanding that the proposed project represents a shift of air emissions associated with solid waste disposal activities on a County-wide basis, as discussed in Section 3.12.3.2.1 of the Draft EIR, the proposed landfill operations and onsite equipment at Toland were analyzed to determine if the proposed project would result in the exceedance of state or federal ambient air quality standards at or beyond the project boundary. As documented in the Draft EIR, the proposed project would not result in state or federal ambient air quality standards being exceeded at or beyond the project boundary. Therefore, based on the significance thresholds developed by APCD, the air quality impacts associated with the onsite operations under the proposed project would be below a level of significance both on a County-wide and local basis.

5. Offsite mobile air emissions resulting from the additional vehicle miles traveled to Toland versus Bailard to transport 1,500 tons of waste per day, would result in a significant air quality impact on a County-wide basis, but on a local basis would not be significant. It is important to note that as discussed in the Draft EIR, however, the offsite mobile air emissions associated with the proposed project at Toland would be less than transporting 1,500 tons of waste per day to the Simi Valley or Chiquita Canyon landfills.

Response 54-2

1. As discussed in Section 1.2.2 of the Draft EIR, in recognition of the importance of long-term management of landfill capacity and to reduce the volume of solid waste requiring disposal, the state legislature passed the California Integrated Solid Waste Management Act of 1989 (also known as Assembly Bill 939 [AB] 939). Among other requirements, AB 939 requires local jurisdictions to prepare SRREs to detail how they will meet mandated reductions in solid waste. AB 939 also requires counties to demonstrate 15 years of landfill capacity for residuals.
2. Compliance with AB 939 requirements is the responsibility of local jurisdictions. VRSD actively supports and participates in various recycling and public education programs regarding solid waste issues. VRSD provides direct support to the County and cities; however, the County and cities are in the best position to develop recycling programs that "make sense" for their communities. By means of the proposed project, VRSD is assisting in the compliance of AB 939 and the mandate to demonstrate 15 years of disposal capacity.
3. The estimated 1,500 tpd of waste to be disposed at Toland under the proposed project is based on waste disposal projections included in the SRREs for the County and its cities served by VRSD. These SRREs assume compliance with AB 939 and 50 percent diversion by 2000. The potential to achieve a waste diversion rate higher than 50 percent is speculative and not reasonably foreseeable. As discussed in Section 4.6 of the Draft EIR, a study which documented the operating experiences of communities with the highest materials recovery levels in the country, found the highest net recovery rate of 56 percent for a small community (population less than 6,000) in New Jersey (Platt, 1991). The highest recycling/composting percentage documented in a major metropolitan area was 36 percent, achieved by the City of Seattle.

Response 54-3

1. The most recent applicable survey to locate possible landfill locations in the County, is the VRSD Siting Study (EMCON, 1991). This study did not specifically analyze Toland, but included a site designated as the O'Leary site which encompasses the Toland property. As discussed in Section 4.5.3.3.10 of the Draft EIR, the O'Leary Canyon site (approximately 450 acres) encompasses the majority of the proposed 213-acre project site (see Figure 3.8.7 of the Draft EIR). The project site, however, does not encroach into O'Leary Canyon. The rankings for the O'Leary Canyon are not, therefore, directly transferable to the Toland site. Several natural resources and development constraints occur on the O'Leary Canyon site which do not occur on the Toland site.
2. An explanation of VRSD Study site rankings compared to the objectives and site boundaries of the Toland Road Landfill Expansion is included in Section 3.8.3.1.5 of the Draft EIR. Included as Table 3.8.3 is a ranking of the Toland site based on the 1991 VRSD Study criteria. An overview of each of the VRSD Study sites, including the top ranking sites, is included in Section 4.5.3 of the Draft EIR.

RECEIVED

NOV 2 1995

V.R.S.D.

10-31-95

55

TO WHOM IT MAY CONCERN:

I WAS INFORMED ABOUT THE
TOLAND LANDFILL PROPOSAL. I WOULD
LIKE TO MAKE MY COMMENTS KNOWN
ABOUT THIS SUBJECT.

I BELIEVE THAT THIS WOULD HAVE
AN DRAMATIC EFFECT ON OUR AIR QUALITY
IN THE VALLEY. THE HEALTH RISK WOULD BE
DRAMATICALLY RAISED. THE INCREASE IN
TRAFFIC ALONE WOULD BE DEVASTATING
TO OUR VALLEY. THE AIR QUALITY
WOULD CHANGE IN A DRAMATIC WAY.
1 THE TRAFFIC ALONG 126 HIGHWAY
IS GETTING MORE AND MORE CONGESTED,
THIS WOULD ONLY ADD TO THIS PROBLEM.

ALSO WE WOULD HAVE TO THINK
OF THE FUTURE EFFECTS THIS MIGHT
HAVE ON OUR WATER USAGE. THERE
IS ALSO THE PEST CONTROL THAT
WE WOULD BE DEALING WITH.

ALL IN ALL, AS FOR MY WIFE SHIRLEY
SEIGLER, AND MY-SELF, RICHARD SEIGLER, I
AM AGAINST THIS PROJECT.

25-131

55

I THINK IT NEEDS MORE DETAILED
STUDY AND CONSIDERATION, ON THE
POSSIBLE CHANGE ON OUR VALLEY.

THANK YOU FOR YOUR TIME

Richard E. Seigler

115 HALL ROAD

SANTA PAULA, CA,

93060

①
CONT.

**DOCUMENT 55
RICHARD SEIGLER
RESPONSE TO COMMENTS**

Response 55-1

1. The commenter's opposition to the proposed project is noted. The potential impacts to water quality, air quality, health and safety, traffic, and noise associated with Toland were evaluated in detail in the Draft EIR (see Sections 3.3, 3.12, 3.15, 3.11, and 3.10, respectively). As summarized in Section 1.3.2 of the Draft EIR and as discussed in detail in the topical sections of Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

2. CEQA provides authority to approve a project which may result in significant unavoidable environmental effects. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impacts.

RECEIVED

NOV 20 1995

Dear Ventura Regional Sanitation District,

I am writing as a Santa Paula citizen opposed to locating the main Western Ventura County Refuse Disposal Station at Toland Road in 1996. I think it is unfair to Santa Paula, a relatively poor community. Sales tax dollars flow to the larger cities of San Buenaventura and Oxnard which have chosen to sacrifice their former agricultural lands to residential and commercial development. We have disdained such development and tried to preserve our smaller agricultural community with less traffic. The county has rewarded us with a jail breaking into the western greenbelt, and now is considering breaking into the eastern greenbelt with a tenfold increase in truck traffic.

Santa Paula has remained self-sufficient with its own water supply and its own small landfill shared with Fillmore. We have used some of our precious tax dollars to fight locating the jail and now the Toland landfill expansion. I think the fair thing to do is to ask the overdeveloped western cities to find someplace else for their unrecyclable trash.

Sincerely,

Douglas Smith

Douglas Smith
424 9th Street

Santa Paula

1

**DOCUMENT 56
DOUGLAS SMITH
RESPONSE TO COMMENTS**

Response 56-1

1. The commenter's opposition to the proposed project is noted. The potential impacts to water quality, air quality, health and safety, traffic, and noise associated with Toland were evaluated in detail in the Draft EIR (see Sections 3.3, 3.12, 3.15, 3.11, and 3.10, respectively). As summarized in Section 1.3.2 of the Draft EIR and as discussed in detail in the topical sections of Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

2. CEQA provides authority to approve a project which may result in significant unavoidable environmental effects. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impacts.

Ventura Regional Sanitation District
District Manager
1001 Partridge Drive, Suite 150
Ventura, CA 93003-5562
Nov. 2, 1995

Susan Stephenson
969 Loma Vista Place
RECEIVED Santa Paula, CA 93060-1329

NOV 5 1995

Dear District Manager:

V. R. S. D.

After reviewing the Introduction Draft Environmental Impact Report Toland Road Landfill Expansion and Landfill Closure/Post Closure prepared for V.R.S.D. by Environmental Solutions, Inc., I am convinced that the proposed expansion is not a sound idea. In fact, in light of the California state mandate to reduce solid waste (by 25% this year and bt 50% by 2000), the idea of expanding a landfill (any landfill in the county) seem quite counter-productive.

The Draft E.I.R. states "the amount of municipal solid waste disposed of in California has been increasing" (at least from 1985-1990). This fact seems to have been included in the Draft E.I.R. to show a need for an expanded landfill. I wonder how this statewide fact applies here to our county. Is our solid waste disposal increasing? Are we simply ignoring the State mandate? Surely we have been making some progress on reducing our disposable waste. This should be our main focus, not a quick-fix, short-term solution of simply allowing more waste to be dumped.

1

I was disappointed that the Draft E.I.R. did not address the impacts of an expansion on adjacent agricultural businesses. This is one of few areas in the world that have the necessary factors to produce food. It is increasing a challenge to produce healthy crops, in an ever-increasingly polluted environment. Our local agricultural managers have worked very hard to create and implement delicate management systems of pest control that are interrelated to the climate, moisture level, dust level and a host of other factors. I am not an expert in this area, but I cannot believe that the report did not even study this issue.

2

In closing, I am simply not willing to accept the inherent problems as outlined in section 1.3.2.2. Specifically, the three impacts that cannot be mitigated, especially the increase in cumulative regional air quality. Therefore, I encourage the two Diversion Alternatives be more seriously considered and much more emphasis on Resource Recovery Alternatives as a real and long-term solution for the county.

3

Sincerely,

Susan Stephenson
Susan Stephenson

**DOCUMENT 57
SUSAN STEPHENSON
RESPONSE TO COMMENTS**

Response 57-1

1. The statewide information on waste generation trends in Section 1.2.2.1 of the Draft EIR was provided as background data to assist the reader. As described in Section 1.2.2.2 of the Draft EIR, comprehensive County-wide assessment of waste generation, recycling and resource reduction trends, and disposal capacity projections will be included in the County Integrated Waste Management Plan (CIWMP). Final approval of the CIWMP is anticipated in 1996.

2. As discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion program implemented under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County only has nine years of remaining landfill capacity (County, 1995a). The County-documented shortfall in landfill capacity is confirmed by a recent CIWMB report which lists Ventura County as one of twenty-one counties statewide which has less than 15 years remaining disposal capacity (CIWMB, 1995).

3. The estimated 1,500 tpd waste to be disposed at Toland under the proposed project is based on waste disposal projections included in the SRREs for the County and its cities served by VRSD. These SRREs assume compliance with AB 939 and 50 percent diversion by 2000. The potential to achieve a waste diversion rate higher than 50 percent is speculative and not reasonably foreseeable. As discussed in Section 4.6 of the Draft EIR, a study which documented the operating experiences of communities with the highest materials recovery levels in the country, found the highest net recovery rate of 56 percent for a small community (population less than 6,000) in New Jersey (Platt, 1991). The highest recycling/composting percentage documented in a major metropolitan area was 36 percent, achieved by the City of Seattle.

Response 57-2

1. Potential project-related impacts to agricultural uses in the Santa Clara Valley are addressed in Section 3.8.3.2.2 of the Draft EIR. Included in the analysis are potential impacts due to changes in the frequency and severity of frosts, the impacts of increased fugitive dust on

orchards, and the potential increase in pests. It is also important to note that the proposed project would not result in existing or potential agricultural lands being taken out of production. Based on the analysis, the proposed project would not have a significant impact on surrounding farming, and therefore would not affect the marketing success or viability of this industry in the County.

Response 57-3

1. Thirty-two project alternatives were evaluated in Chapter 4.0 of the Draft EIR. None of these alternatives were found to have the potential to eliminate either the project-related or cumulatively significant air quality impacts associated with the proposed project. Since the County is a nonattainment area for state ambient air quality standards for ozone and PM₁₀, a contribution to these pollutants would result in a significant impact. Due to the unavoidable emissions within the County associated with waste transport, either by truck or rail, out-of-County landfill alternatives would also result in significant air quality impacts.
2. Chapter 4.0 of the Draft EIR thoroughly reviewed the relative environmental impacts associated with diversion to in-County and out-of-County landfills both by truck and by rail. The alternatives analysis is comprehensive, objective, and meaningful.
3. As discussed in Section 4.6 of the Draft EIR, AB 939 mandates local jurisdictions to implement strategies to divert 25 percent of solid waste from landfills by 1995 and 50 percent by 2000. The estimated 1,500 tpd waste to be disposed at Toland under the proposed project is based on waste disposal projections included in the SRREs for the County and its cities served by VRSD which assume compliance with AB 939 and 50 percent diversion by 2000. Although the County may be on the "cutting edge" of new recycling technologies and market development proposals, the potential to achieve a waste diversion rate higher than 50 percent is speculative and not reasonably foreseeable. As discussed in Section 4.6 of the Draft EIR, a study which documented the operating experiences of communities with the highest materials recovery levels in the country, found the highest net recovery rate of 56 percent for a small community (population less than 6,000) in New Jersey (Platt, 1991). The highest recycling/composting percentage documented in a major metropolitan area was 36 percent, achieved by the City of Seattle.

**PUBLIC MEETING
WRITTEN COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
TOLAND ROAD LANDFILL EXPANSION AND
CLOSURE/POSTCLOSURE**

Submit to VRSD representative at the Public Meeting, or mail or hand deliver to: Ventura Regional Sanitation District, Attention: District Manager, 1001 Partridge Drive, Suite 150, Ventura, California 93003-5562. Mailed or hand delivered comments must be received at the above address by 5:00 p.m. on Monday, November 6, 1995.

SEE ATTACHED

RECEIVED

NOV 9 1995

V. R. S. D.

Submitted By: FRED STRICKLAND
Name (please print)
519 N. 10TH ST.
Street Address
SANTA PAULA, CA 93060
City State Zip

Fred Strickland
519 N. 10th St.
Santa Paula, CA 93060

October 28, 1995

Dear Members of The Ventura Co. Regional Sanitation District:

The following are my reasons why the data in the Environmental Impact Report for the Toland Road Landfill Expansion is in error, insufficient and wholly unacceptable.

My qualifications for these statements are as follows: **• B.S. in FAVOR SCIENCE AND RURAL RESTORATION, MASTER**

- I am a third generation citrus and avocado grower. **DAIRY AND C&C.**
- I taught Integrated Pest Management and other related agricultural subjects at Cal Poly, San Luis Obispo for three years.
- I was a licensed Pest Control Advisor (#7007) for over a decade specializing in IPM.
- I now work for Paramount Citrus Association farming over 2600 acres of citrus and avocados.
- Our family farm is immediately adjacent to the proposed expansion site. I am a potential resident of the house on the property, thus a "Maximally Exposed Individual" (M.E.I.) along with my wife and nine month old son.

1. Dust has a zero tolerance in effective Integrated Pest Management of citrus and avocados. Obviously, all dust is never controlled in an agricultural environment, but any effort to control additional deposits of dust and other solids must be made. Local growers spend thousands of dollars a year on water trucks to control dust on a daily basis and often hourly during harvest operations. Does the proposed plan include application of water to all of Toland Road during operating hours? Ben Faber of the U.C. Cooperative Extension Service has recently recommended biological control only for the control of the *Persea* mite of avocados. This new and incredibly destructive pest currently threatens to defoliate, and even kill, our avocado trees. The largest infestations of this mite in the county are in close proximity to the dump. This pest spins a heavy web under which it hides and lays its eggs. When dust lands on this web, it makes the mite virtually impossible to kill using pyrethroids mites and other beneficial insects. Any additional activity that creates dust in citrus and avocado growing areas is unacceptable.
2. Your group has regularly referred to a report from Cal Poly Pomona that supposedly states that the dump close to their campus has had no impact on agriculture. I personally know many of the staff of the Agriculture Department and the Dean's Office. I have also observed their IPM program at their Pine Tree Ranch (located on Highway 126 just west of Toland Road) well within the "impact zone" of the dump. An actual copy of this report is not included in the draft E.I.R. It should be. I would appreciate a copy sent to me at your earliest convenience.
3. A.P.C. data used in the draft report for Piru is inapplicable. Weather patterns and geographical differences between Piru and the Toland site are substantial.
4. Sub-freezing temperatures of short durations are common during the winter on Toland Road. Water of any kind on the surface of the road, combined with rubber and diesel emission solids, would form "black ice" making braking for the stop at Hwy. 126 difficult, if not impossible. The E.I.R. must address this scenario.
5. The data for truck emissions is, I believe, in error. Please review diesel versus gas emissions. Also the data in the report must include climbing and braking diesel engine data that match the topography of Toland Road.
6. Is the proposed expansion of the dump economically feasible? State mandated recycling, ever-increasing public awareness of "the trash crisis" and other efforts to curb production of solid waste may leave the V.R.S.D. with an unprofitable "white elephant" in the future. A detailed analysis of the long-range profitability of the expansion must be included in the E.I.R.

7. Is the V.R.S.D. the valid and appropriate "lead agency" for the Environmental Impact Report? It is 7
not a branch of the County government.

Sincerely,



Fred Strickland

cc: Ventura County Supervisors (individually)
Ventura County Tax Payers Association

**DOCUMENT 58
FRED STRICKLAND
RESPONSE TO COMMENTS**

Response 58-1

1. This comment is concerned about dust on the leaves of orchard trees, especially with respect to the destructive Persea mite on avocado trees. Zero tolerance for dust as a concept is not applicable because its realization would require no travel on dirt roads within and around orchards nor on Highway 126. As noted in Section 3.8.3.2.2 of the Draft EIR, the proposed project would contribute only a few percent of the total PM₁₀ concentration and related deposition. Therefore, the use of watering to control dust from orchard roads is the most effective control that could be implemented by the growers.
2. As discussed in Section 3.12.7 of the Draft EIR, mitigation measures for the control of fugitive dust included, but are not limited to, watering of onsite unpaved roads, and flushing or sweeping of onsite paved roads. The plan is to water unpaved roads, work areas, and storage piles to the extent that it can control fugitive dust without causing unpaved roads to become muddy or slippery (i.e., unsafe). An apron would be constructed at the juncture of the unpaved and paved roads to minimize trackout of dirt onto the paved road.
3. In response to this and other comments, a mitigation measure has been included in the EIR to install a wheel washing station that vehicles leaving the landfill active working face on the dirt road would pass through at the apron, which is the transition section at the end of the paved road where it becomes an unpaved road. The inclusion of this mitigation measure in this Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.
4. The wheel washing station would work in conjunction with the mitigation measures included in Section 3.12.7 of the Draft EIR that require the apron to be flushed with water often enough to assure that the tires cannot track out dirt or mud, and that the onsite paved road shall be swept or water flushed. This combination of measures would significantly reduce the amount of dirt vehicle tires would carry onto Toland Road.
5. At any point in time, only a small area of dirt cover borrow material, unpaved road, and dirt working area in front of the active face is exposed and subject to wind erosion. These areas are treated (e.g., watered) to minimize fugitive dust emissions. Dirt areas of the landfill that

make up the rest of the cover borrow piles, top deck of the landfill, and elsewhere that are not being actively disturbed by equipment are treated with water or chemical dust suppressants to sufficiently eliminate emissions of fugitive dust.

6. Also based on this and other comments, a mitigation measure has been included in the EIR that shall require VRSD to pave, or pay the cost to pave, roads in the vicinity of Toland to mitigate the PM_{10} generated by the proposed project. The linear feet of unpaved road to be paved shall be developed in consultation with the APCD and shall be sufficient to offset the PM_{10} concentrations from project sources (i.e., offsite mobile emissions and onsite emissions). Based on a preliminary analysis, paving approximately 27,500 linear feet (i.e., approximately 5.2 miles) of unpaved roads in the vicinity of Toland would offset the PM_{10} generated by the "worse case" traffic scenario (i.e., 450 vehicles per day versus the "proposed case" of 210 vehicles per day). The actual linear feet of unpaved road to be paved to offset the PM_{10} generated by the proposed project would be based on the number of vehicles traveling to the site on a daily basis. Therefore, potential impacts from the emission of fugitive dust from these dirt roads before paving will be decreased the same amount as the potential impact of the PM_{10} emissions from the proposed project. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 58-2

1. As requested, a copy of the report entitled, *Agricultural Impact Report: The Potential Impact on Local Agriculture from the Proposed Rail•Cycle Bolo Station Landfill* by Edwin Barnes, Ph.D. of Cal Poly Pomona is included in Appendix F of this Final EIR.

Response 58-3

1. The background PM_{10} data from the Piru monitoring station was used for purposes of the Draft EIR based on a recommendation from APCD. Subsequent to preparation of the Draft EIR, APCD indicated that PM_{10} monitoring data was available from the SP Milling project at Sycamore Ranch, located approximately 1.7 miles southeast of Toland Road Landfill. The PM_{10} monitoring stations at Sycamore Ranch are located at an elevation of approximately 500 feet, which is approximately 500 feet lower than the southwest corner of

the landfill footprint. The lateral and vertical proximity (1.7 miles and 500 feet, respectively) of these monitoring stations to the landfill assure reasonable representativeness for the PM₁₀ monitoring data.

2. An evaluation of the Sycamore Ranch data provided by APCD indicates that the arithmetic mean PM₁₀ concentration during the period of October 1994 through August 1995 was 15.1 µg/m³, which is 52 percent of the 1994 annual arithmetic mean of 29.1 µg/m³ at Piru. The comment's observations regarding the proximity of the Piru monitoring station to the dry bed of the Santa Clara River may partly explain why the PM₁₀ concentration measured at the Piru station in 1994 (29.1 µg/m³) is almost twice that measured at Sycamore Ranch.
3. Combining the Sycamore Ranch PM₁₀ concentration data with the model data, the range of potential PM₁₀ concentrations in nearby orchards (i.e., up to 0.68µg/m³) that could be generated by the proposed project represents only 4.5 percent of the baseline concentration of PM₁₀ in these orchards.

Response 58-4

1. The comment requested that the Draft EIR address the potential combined effect of rubber solids/diesel emission by-products on Toland Road from waste haul trucks and the potential safety hazards if mixed with water or black ice. The combination of rubber solids/diesel emission by-products would reduce the potential for black ice to form as the freezing point is lower than for water alone. In addition, there are only limited occasions in which freezing temperatures would occur in the vicinity of the site (average of six times a year per Table 3.8.4 of the Draft EIR). There are no recorded incidents regarding trucks losing control while traveling down Toland Road due to water and/or ice on the roadway. An increase in truck traffic would not increase the potential for this to occur, therefore, no significant safety impacts would be expected under the proposed project.

Response 58-5

1. Vehicle emissions estimates in Section 3.12 of the Draft EIR are based on the most recent version (EMFAC7F1.1) of CARB's emission factor computer model, which takes into account standardized test cycles and nonstandard conditions. Inputs used in the model include

type of vehicle, fuel, speed, control technology (e.g., catalytic), ambient temperature, and year (up to 2020 is available). These emission factors, the most detailed available, were selected for purposes of the Draft EIR for heavy-duty diesel trucks traveling at 25 mph on Toland Road.

2. CARB confirms that specific emission factors have not been developed to simulate trucks ascending grades (CARB, 1995), therefore, increased emissions associated with trucks ascending Toland Road are considered to be included in the standard emission factors from CARB. The potential significance of these emissions and resulting ambient concentrations is interpreted by reference to state and federal ambient air quality standards. These standards were developed to protect human health with an adequate margin of safety, and are concentrations averaged over time periods that vary from one hour to one year. These averaging times remove much of the detailed variability that exists in emission sources, especially in mobile sources with engine loading that varies continuously based on factors such as accelerator position and road grade.
3. Further context for the appropriateness of using standard emission factors comes from the observation that vehicular air emissions in the vicinity of Toland are influenced far more by nonproject-related traffic volumes on Highway 126 than from project-related traffic volumes. As noted in Section 3.11.4 of the Draft EIR, 1.2 to 2.3 percent (i.e., "proposed case" and "worse case," respectively, as defined by the Draft EIR) of the 37,600 vehicles per day that are estimated to use Highway 126 in 2015 (furthest projection available from Caltrans) would be associated with the proposed project. The other 36,735 to 37,150 vehicles will emit 97 to 98 percent of the total mobile source emissions associated with traffic on Highway 126.

Response 58-6

1. The staff of VRSD has provided the VRSD Board of Directors with detailed information regarding the economics of the proposed project, including the minimum disposal rate necessary to make the proposed project economically viable. The Board of Directors will consider this economic information along with the EIR as it makes its decision regarding the proposed project.

Response 58-7

1. CEQA Guidelines lists criteria for identifying the lead agency when two or more public agencies will be involved with a project:
 - "If the project will be carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency." (Section 15051 (a))
 - "Where more than one public agency equally meet the criteria in subsection (b), the agency which will act first on the project in question shall be the Lead Agency." (Section 15051 (c))

2. Based on the criteria listed in the CEQA Guidelines, VRSD is the appropriate lead agency for the proposed project. VRSD acting as the lead agency for the proposed project is analogous to a city or county acting as the lead agency for a public works project that they are implementing. Other agencies (referred to in the CEQA Guidelines as responsible agencies) will use the EIR in the process for issuance of the various permits required for the proposed project. The pertinent requirements of these agencies have been considered in the environmental analyses.

November 3rd, 1995

59

RECEIVED

NOV 6 1995

Ventura Regional Sanitation District
1001 Partridge Drive Suite 150
Ventura, California 93003-5562 Attention General Manager

V. R. S. D.

We are Ashby and Carolyn Vickers. We live at 621 Hall Road, Santa Paula. We bought, cleared the land, planted our lemon orchard, and built our house some 27 years ago. We wish to go on record as opposing the extension of Toland Landfill.

There are 18 homes on Hall Road, all within hearing and smelling distance of the landfill.

Traffic on Highway 126 is horrendous at present. Adding many more trash trucks will certainly add to the danger of this busy highway. The students at the Santa Clara School (Little Red School House) should not be subjected to the additional noise and danger of more trash trucks.

1

The use of San Cayetano water on the site is questionable because of Agnes Toland's bequest to the County of Ventura of her water stock for agricultural and domestic use only and because of San Cayetano Water Company by-laws.

2

Because of these and many other environmental and property value issues, we feel that the extension of the present landfill is completely unacceptable.

Yours Truly,

Ashby Vickers
Ashby Vickers

Carolyn Vickers
Carolyn Vickers

cc
Maggie Kildee. Supervisor

Robert Sawyer, Lawyer

**DOCUMENT 59
ASHBY AND CAROLYN VICKERS
RESPONSE TO COMMENTS**

Response 59-1

1. As discussed in Section 3.11.2.5 and depicted on Figure 3.11.4 of the Draft EIR, based on records from Caltrans, the accident rate along Highway 126 in the vicinity of the proposed project site is substantially lower than the statewide average. The highway is a four-lane divided roadway in the vicinity of Toland. Higher accident rates occur east of the project site, particularly east of Fillmore where the highway is only two lanes (with periodic passing lanes). Since the proposed project would not contribute to additional traffic east of Toland Road, it is not anticipated to appreciably increase the accident risk along Highway 126 east of Toland Road. In addition, because the proposed project would represent approximately 2.3 percent of the future average daily trips (ADTs) for the "worse case" traffic scenario (i.e., packer trucks to transport waste to Toland) on Highway 126 and 1.2 percent of the ADTs for the "proposed case" traffic scenario (i.e., transfer trucks to transport waste to Toland), the proposed project is not anticipated to appreciably increase the accident risk along Highway 126.
2. The accident data included in Section 3.11.2.5 of the Draft EIR was provided as baseline traffic information and was not meant to imply that the accident rate would remain constant under future conditions. Historical information is, however, relevant in assessing the potential for future accidents. The first step in highway accident prevention is to have accurate and detailed information of circumstances surrounding past accidents (Oglesby and Hicks, 1982). Section 3.11.3.1.3 of the Draft EIR provides the rationale to support the conclusion that the accident risk along Highway 126 is not anticipated to appreciably increase due to the proposed project.
3. Project-related traffic operation and safety issues related to Santa Clara School were also addressed in the Draft EIR (Sections 3.11.3.1.2 and 3.11.3.1.3, respectively). Based on the review of the project's traffic study, neither Caltrans or the County Department of Transportation identified student hazards related to the proposed project.
4. Intersection improvements as recommended by Caltrans, however, would further mitigate potential traffic-related safety issues. Recommended improvements at the Toland Road/Highway 126 intersection include the installation of an intersection control flashing beacon, intersection lighting, and warning signs (see Comment Letter 02). These improvements are included in the EIR as mitigation measures.

5. The increase in noise at Santa Clara School due to waste trucks would be minimal. As shown in Table 3.10.8 of the Draft EIR, the maximum noise increase along Highway 126 west of Toland Road due to the proposed project would be 0.6 dBA. This increase would occur under the "worse case" traffic scenario and waste transport by packer trucks. Under the "proposed case" of transfer trucks, the increase due to the proposed project would only be 0.3 dBA. Both existing and future noise levels at the school are primarily due to the nonproject-related, cumulative traffic on Highway 126.

Responses 59-2

1. As discussed in Section 3.3.3.1.2 of the Draft EIR, approximately 30-acre feet per year of nonpotable water would be provided to the proposed project from one or a combination of the three following sources:
 - A new offsite well located south of Toland Park.
 - A proposed new onsite well on VRSD's 53-acre parcel.
 - An agreement with the Rio Plaza Water Company for VRSD to purchase water for transport to Toland by truck.

These three sources for nonpotable water are not within or controlled by the San Cayetano Water Company.

2. Of the three sources for nonpotable water, the agreement with the Rio Plaza Water Company is the only demonstrated source. It is for this reason that the traffic, noise and air quality analysis in the Draft EIR included the impacts associated with delivery of water from El Rio by truck. In the event, however, that either or both of the new wells become a reality, a revised mitigation measure is included in Table 1.1 of the Final EIR that requires VRSD to offset the water withdrawn by these wells by reducing water usage at the Bailard and Coastal landfills to mitigate the project's contribution to overdraft of the Oxnard Plain.

1205 Say Rd
 Santa Paula, Ca. 93060
 Oct. 26, 1995

RECEIVED

OCT 30 1995

V.R.S.D.

General Manager
 Ventura Regional
 Sanitation District
 1001 Partridge Drive, Suite 150
 Ventura, Ca. 93003-5562

Dear Sir:

I am writing to comment upon the DEIR regarding the Toland Road Landfill expansion project. I would like to register strong opposition to the plan because of its potential impact on air quality. Those of us with sensitivity to air pollution will be adversely affected, particularly in a valley as narrow as the Santa Clara. Thank you. Sincerely, Mrs. Ellen Hoffmann

**DOCUMENT 60
ELLEN WOLFF WIMMER
RESPONSE TO COMMENTS**

Response 60-1

1. The commenter's opposition to the proposed project is noted. Air quality impacts associated with the proposed project were addressed in Section 3.12 of the Draft EIR. As discussed in the Draft EIR, air emissions associated with the proposed project would be accompanied by corresponding emissions reductions at Bailard as landfilling operations shift to Toland. Therefore, on a County-wide basis, air emissions associated with the proposed landfill operations and onsite equipment at Toland would not represent a significant emissions impact.

2. Notwithstanding that the proposed project represents a shift of air emissions associated with solid waste disposal activities on a County-wide basis, as discussed in Section 3.12.3.2.1 of the Draft EIR, the proposed landfill operations and onsite equipment at Toland were analyzed to determine if the proposed project would result in the exceedance of state or federal ambient air quality standards at or beyond the project boundary. As documented in the Draft EIR, the proposed project would not result in state or federal ambient air quality standards being exceeded at or beyond the project boundary. Therefore, based on the significance thresholds developed by APCD, the air quality impacts associated with the onsite operations under the proposed project would be below a level of significance both on a County-wide and local basis.

3. Offsite mobile air emissions resulting from the additional vehicle miles traveled to Toland versus Bailard to transport 1,500 tons of waste per day, would result in a significant air quality impact on a County-wide basis, but on a local basis would not be significant. It is important to note that as discussed in the Draft EIR, however, the offsite mobile air emissions associated with the proposed project at Toland would be less than transporting 1,500 tons of waste per day to the Simi Valley or Chiquita Canyon landfills.

SECTION 2.6

**PUBLIC MEETING TRANSCRIPT
(SANTA PAULA - OCTOBER 19, 1995)
COMMENTS AND RESPONSES**

1 Santa Paula, California
2 Thursday, October 19, 1995; 7:00 p.m.
3

VENTURA REGIONAL SANITATION DISTRICT

4 MR. CONWAY: I'm John Conway. I am the solid waste
5 director for the Ventura Regional Sanitation District. I'd
6 like to acknowledge that we have Mr. Ed Bischoff, who is the
7 acting general manager right now, in the audience. I can't
8 see him right now. Ed, are you out there? There he is.
9 He's sitting back in the back there.

TOLAND ROAD LANDFILL

PUBLIC MEETING

Draft - Environmental Impact Report
Toland Road Landfill Expansion
and Landfill Closure/Postclosure

THURSDAY, OCTOBER 19, 1995

10 Tonight's agenda and program will be conducted by
11 Mr. Bob Mason, Environmental Solutions. His is a company
12 that wrote the Draft EIR that we're here to talk about
13 tonight and he will be discussing the procedure that we're
14 going to follow, and will outline how we will proceed for
15 this two-hour session that we have tonight. Mr. Bob Mason.

16 MR. MASON: Good evening and welcome tonight. To begin,
17 I'd like to take a few minutes to put this meeting into
18 perspective and also to familiarize those who are
19 not -- who have not gone through the EIR process before with
20 something about the environmental impact analysis process.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

530 West Main Street
Santa Paula, California

21 I'll also take a few minutes, as John said, to provide an
22 overview of the Toland Road Landfill and the findings of the
23 Draft EIR.

24 We've put together an information packet this
25 evening that has selected tables and figures out of the

REPORTED BY
ANN L. WRIGHT
CSR NO. 5725

1 Draft EIR that I'll be discussing over the next 10 to 15
2 minutes. If you didn't pick up a copy of that, I believe
3 there are probably still some available in the back.

4 As John indicated, this is a meeting to solicit
5 oral comments on the Draft EIR. For those of you who wish
6 to make comments tonight, we have provided speaker sign-up
7 cards. If you don't have one, those are also at the back.
8 I think most of you probably got one on your way in. If you
9 wish to speak, please fill out the card, including your
10 mailing address, give it to one of the district
11 representatives and they will bring it up to me. We have a
12 court reporter with us tonight so that we are sure we have
13 an accurate record of your comments.

14 As John indicated, we only have this room until
15 nine o'clock, and so we can make sure everyone who wishes to
16 speak has an opportunity, I'm going to ask that you limit
17 your comments to five minutes. Also in the interest of
18 time, if you are represented by or a part of a group that is
19 making an oral comment, we'd ask that you select one
20 spokesperson to make those comments.

21 Regarding the EIR process itself, agencies such as
22 the Ventura Regional Sanitation District are required to
23 analyze and identify the environmental impacts of their
24 actions and to evaluate the feasible means to reduce or
25 eliminate those impacts that otherwise might occur.

1 It is important to note that the EIR is not a
2 decision-making document. It does not recommend approval or
3 denial of the project. Rather, it is a disclosure document
4 intended to inform the public agencies, the public and the
5 decision-making bodies as to the environmental consequences
6 of the project, alternatives to the project, mitigation
7 measures that could reduce or eliminate significant impacts,
8 and whether there are unavoidable adverse impacts that will
9 require statements of overriding considerations.

10 The draft of the Final EIR will be reviewed by the
11 district's board of directors as the decision-making body
12 for this project, along with other technical, social and
13 economic data. Only after the board has completed its
14 review will it make a decision regarding the project.

15 The EIR process includes the solicitation of public
16 input at each step. Tonight's meeting is a continuation of
17 the public input process for Toland that began in March with
18 the distribution of a Notice of Preparation. Two meetings
19 were also held in March, one here in Santa Paula and the
20 other in Fillmore, to solicit issues that should be
21 addressed in the EIR.

22 The process also requires that the Draft EIR be
23 distributed for public comment. The Draft EIR for Toland
24 was distributed for a 45-day public comment period that
25 began on September the 21st and ends on November the 6th.

1 Copies of the Draft EIR were provided to local, regional,
 2 state and federal agencies. Copies of the introduction to
 3 the Draft EIR that summarizes the project and its impacts
 4 and mitigations and major findings of the EIR were
 5 distributed to interested members of the public and public
 6 interest groups. I expect that many of you here tonight
 7 have already received copies of the introduction by mail.
 8 However, if you have not, as you leave this evening, there
 9 are copies available at the back.

10 Copies of the Draft EIR are also available for
 11 public review at the district offices in Ventura and at the
 12 county public law library in the Government Center in
 13 Ventura, also in the Santa Paula and Fillmore public
 14 libraries, as well as the public library in Camarillo,
 15 Port Hueneme, Oxnard, Ojai, Thousand Oaks and Ventura, and
 16 also at the Santa Paula and Fillmore City Halls.

17 Also back at the back there is a copy of a legal
 18 notice that VRSD purchased and had running in papers that
 19 gives the locations where the Draft EIRs are available for
 20 review. In addition, the Draft EIR is also available for
 21 copying for approximately \$45 at the Kinko's at 4360 Main
 22 Street in Ventura.

23 While the meeting tonight is not required as part
 24 of the EIR process, the District decided it was important to
 25 hold this meeting tonight to provide you with an opportunity

1 to provide oral comments on the draft.
 2 As part of the continuing process and evaluation of
 3 the project, of which the EIR is only a portion, there will
 4 be meetings for you to voice your position on the project
 5 with the District Board of Directors. Therefore, we request
 6 that you focus your statements this evening on your specific
 7 comments on the Draft EIR.

8 In addition to providing this opportunity for oral
 9 comment on the draft, written comments may be submitted to
 10 the District. To be included in the next phase of the EIR,
 11 written comments must be received by five p.m. on November
 12 the 6th. For your convenience, at the back of the
 13 information packet there is a blank written statement form
 14 that you may use to provide these comments, if you wish.

15 You can obviously also go longer than that, if that is also
 16 your desire. If you wish, you can fill those out tonight if
 17 you know what your comments are and give them to one of the
 18 District representatives, or, again, they may be mailed to
 19 the District to arrive by the 6th of November, and the
 20 District's address is on that form.

21 After the close of the public comment period on the
 22 6th of November, the Final EIR will be prepared that
 23 addresses each of the comments on the Draft EIR. As
 24 currently scheduled, the Final EIR is expected to be
 25 completed in late January 1996. After the Final EIR is

1 on an approximately 161-acre site. This is showing the
 2 landfill footprint as proposed. Also, the District owns a
 3 53-acre parcel immediately south of the landfill where it
 4 will have its operation maintenance center, scale house and
 5 a stormwater detention basin.

6 Under the proposed project, operations at Toland
 7 would be expanded to six days per week, Monday through
 8 Saturday, and the landfill would be open to commercial and
 9 private waste haulers from six a.m. to six p.m., and from
 10 eight a.m. to four p.m. to the general public.

1 complete, the District Board of Directors will hold a public
 2 hearing on the project.

3 I'll take a few minutes to summarize the project
 4 and I'll refer to some of the tables and the figures that
 5 are in your packet. The project is being considered the
 6 means to continue to provide long-term, low cost in-county
 7 waste disposal capacity beginning in the summer of 1996 when
 8 the Bailard Landfill near Oxnard is projected to close.

9 The daily waste tonnage would increase from the
 10 currently-permitted 135 tons of waste per day to 1500 tons
 11 per day. The landfill would also be expanded vertically and
 12 laterally to provide a capacity of approximately 30 million
 13 cubic yards, or about 15 million tons of waste. At 1500
 14 tons per day, the landfill would have a capacity of
 15 approximately 31 years.

11 EIRs must include an analysis of a range of
 12 alternatives to determine if significant impacts associated
 13 with the project could be reduced or eliminated by an
 14 alternative. The alternatives evaluated for waste generated
 15 in the west county of the Santa Clara Valley include
 16 diversion to an in-county landfill. This alternative
 17 considers the diversion of waste to the Simi Valley
 18 Landfill. Diversion to an out-of-county landfill, under
 19 this alternative, waste would be transported by a truck to a
 20 landfill located in an adjacent county such as the Chiquita
 21 Canyon Landfill or the Sunshine Canyon Landfill in Los
 22 Angeles counties.

23 It also considered diversion to a rail-haul
 24 landfill. Under this alternative, waste would be
 25 transported by rail to one of the remote landfills proposed

16 Toland would continue to serve the cities and
 17 communities of the Santa Clara Valley and would also provide
 18 service to those areas currently served by Bailard,
 19 including the city of Oxnard, Port Hueneme, Ventura,
 20 Camarillo and Ojai and the surrounding unincorporated areas.

21 Toland would only accept waste generated in the county or
 22 waste from a transfer station or material from a coverage
 23 facility located in the county.

24 Toland -- this is where I'm going to be referring
 25 to some of those that are in your packet. Toland is located

1 in the desert of California or to an existing landfill in
 2 Utah.
 3 Offsite alternative locations were also considered.
 4 Under this alternative, a new landfill would be sited in
 5 Ventura County at some other location.
 6 Resource recovery alternative: This alternative
 7 evaluates the potential for solid waste management
 8 technologies to reduce the volume of waste requiring
 9 landfilling, including source reduction, recycling,
 10 composting and waste transformation.
 11 Reduced project alternative: Under this
 12 alternative, Toland would accept a maximum of 1000 tons per
 13 day rather than 1500 tons per day, and the landfill would
 14 have a capacity for 20 years; and it also considered, as
 15 required through the process, the no-project alternative.
 16 Under this alternative, the proposed project would not
 17 occur.
 18 For the purposes of the Draft EIR, it is assumed
 19 that upon the closure of Bailard in 1996, Toland would also
 20 close.
 21 Based on the analysis in the draft EIR, it has been
 22 determined that none of alternatives would reduce or
 23 eliminate significant impacts as inherent in the project.
 24 While site-specific impacts could be avoided at Toland,
 25 these impacts would be transferred to another site that

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1 would not result in reduced environmental impacts.
 2 There are several issues I would like to discuss
 3 regarding specific alternatives. This placard -- again, the
 4 reason that these are in your handouts is I know you'll have
 5 trouble seeing those from the back.
 6 This placard -- here is Highway 126, Fillmore,
 7 Santa Paula, Toland located in between the two, Bailard
 8 Landfill down in Oxnard -- I'll come back to the mike.
 9 Chiquita Canyon Landfill, just on the other side of Los
 10 Angeles County; Sunshine Canyon Landfill, Elsmere Landfill,
 11 a proposed landfill; Simi Valley; Calabasas.
 12 Chiquita is currently permitted to receive waste
 13 until 1997. It is going through its own EIR process to get
 14 an extension of its permits. Elsmere, again, is a proposed,
 15 and there's a draft Environmental Impact Report out for it.
 16 There are several points I want to make about the
 17 alternatives. This chart here -- again, this is in your
 18 packet -- shows the miles that would be required on a
 19 one-way basis to travel for one truck -- excuse me, for all
 20 the trucks to travel to Toland Road, as well as to Simi
 21 Valley, Chiquita Canyon and Sunshine Canyon, to transport
 22 1500 tons per day.
 23 As you can see, these are the totals running across
 24 here. They are for an assumption of 210 trucks, and, as you
 25 can see, Toland is about 6200 miles that would be traveled;

1 to get to Simi Valley, it would be about 6900 miles to get
 2 to Chiquita; it would be over 12,000 miles per day; and to
 3 get to Sunshine it would be close to 16,000 miles a day.
 4 Those again are for all the trucks that would be travelling
 5 on a daily basis.

6 This chart also shows an item that we discussed
 7 throughout the project as appropriate. It's the difference
 8 between hauling waste to Toland or any other landfill by
 9 what are called transfer trucks, which hold 20 tons of
 10 waste, versus a packer truck, which holds about eight tons
 11 of waste per day.

12 The VRSD proposes that the waste that will come
 13 from the west county to Toland will be by transfer truck.
 14 It will come from one of the transfer stations, either the
 15 city of Oxnard transfer station or the existing Gold Coast
 16 transfer station. Under that concept, there would be
 17 approximately 210 vehicles a day that would travel to
 18 Toland, and it would end up with these types of mileages
 19 here, and, again, to get across to the other landfills.

20 However, although unlikely, if the two transfer
 21 stations in the west county are not operational or if the
 22 cities or commercial haulers make a decision not to haul
 23 waste or take waste to those transfer stations, but rather
 24 to haul that waste directly to Toland, that's what we've
 25 called the worst case, and we've addressed that also in the

1 Environmental Impact Report, and, again, you can see the
 2 mileages here on a daily basis of about 17,000 to get to
 3 Toland. This is based upon 450 vehicles, 18,000 get to
 4 Simi, 32,000 to get to Chiquita Canyon, and 42,000 miles to
 5 get to Sunshine Canyon.

6 The District does not control the transfer
 7 stations. They are being operated or proposed by others,
 8 and it's for that reason that we have also addressed the
 9 worst case in the Environmental Impact Report.

10 What this table does is goes ahead and then
 11 addresses one of the important issues, and that has to do
 12 with offsite mobile emissions from the trucks that are
 13 required to haul the waste back and forth. Again, based
 14 upon the number of miles, that generates how much air
 15 emissions are going to be produced in a day.

16 Again, as you can see, NOX stands for nitrogen
 17 oxide, ROG is reactive organic gas, SOX is sulphur dioxide,
 18 CO is carbon monoxide, PM-10 is particulate matter. As you
 19 can see, the differences between Toland and Simi aren't that
 20 large, and that's because the mileages are about the same,
 21 but the emissions to get to Simi are larger.

22 But as you can see, as we come to taking the same
 23 amount of waste to Chiquita or Sunshine, that the emissions
 24 start to increase. This is, again, for the proposed case,
 25 and then below is for the worst case, this being the 210

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1 the County of Ventura has determined that it will need to
 2 rely on more capital-intensive approaches to waste reduction
 3 and recycling. Based on the findings of the state of
 4 California and the county, achievement of a diversion rate
 5 in excess of 50 percent is speculative and not foreseeable.
 6 Therefore, the resource recovery alternative does not
 7 represent a reasonable alternative to the proposed project.

8 This table is also in your handout. It summarizes
 9 the impacts identified in the Draft EIR. The table
 10 indicates the impact before mitigation, if mitigations are
 11 included in the EIR, and the level of significance after
 12 mitigation.

13 As shown, the potential environmental impacts of
 14 the proposed projects would be reduced below a level of
 15 significance, with the exception of cumulative noise impacts
 16 at the Santa Clara School caused by non-Toland related
 17 traffic noise on Highway 126, cumulative traffic impacts at
 18 the intersection of Toland Road and Highway 126 caused by
 19 non-Toland related traffic volumes on Highway 126, and
 20 project-related and cumulative regional air quality impacts
 21 associated with accumulated offsite emissions, that I talked
 22 about earlier. However, again, the mobile emissions are
 23 less for the proposed project at Toland as compared to
 24 diverting waste to other in-county or out-of-county
 25 landfills such as Simi Valley or Chiquita Canyon.

1 vehicles per day, this being 450 vehicles per day.
 2 That's important, particularly for Chiquita and
 3 Sunshine, because those emissions, in addition to those
 4 going to Toland, would be within the Santa Clara Valley.
 5 Based upon that, both Simi Valley, Chiquita and Sunshine
 6 would have greater mobile emissions than the proposed
 7 project at Toland.

8 Regarding the resource recovery alternative -- and
 9 then I'll move off the alternatives -- the 1500 tons of
 10 waste a day to be disposed at Toland is based on the waste
 11 disposal projections developed by the cities and the
 12 unincorporated areas of the county served by the District.
 13 These projections assume compliance with state law, a
 14 required diversion of 25 to 50 percent of waste from
 15 landfills by 1995 and 2000, respectively.

16 Therefore, under the resource recovery alternative,
 17 diversion of waste in excess of 50 percent would be required
 18 to reduce the disposal capacity provided by the proposed
 19 project. The state of California has concluded that it may
 20 be difficult for any jurisdictions to meet the 50 percent
 21 waste diversion requirements. It concluded that dramatic
 22 increases in source reduction, recycling and composting, as
 23 well as an increase in market demand, will be required to
 24 meet the 50 percent diversion rate.

25 In addition, to meet the 50 percent diversion goal,

1 The other impacts for the proposed project are
 2 either not significant or can be reduced below a level of
 3 significance through the implementation of mitigation
 4 measures included in the Draft EIR. Rather than going
 5 through each of the findings of the EIR, we'll focus on some
 6 of the more important issues.

7 Land use: You have a different figure in your
 8 packet, but I'm going to use this one because it's larger.
 9 This is an aerial photo. This is Toland Road. As you can
 10 see, the landfill is surrounded by agricultural uses, and
 11 there are scattered residential areas or residences in the
 12 area. You can probably see those perhaps better on the
 13 figure that's in your information packet.

14 The Santa Clara School, that's right here. This is
 15 Toland Road, this is 126.

16 Toland is located in an area that is designated as
 17 open space in the county's General Plan and as a solid waste
 18 disposal site on the public facility map of the General
 19 Plan. Under the county's zoning ordinance, landfills are a
 20 permitted conditional use in open space zones.

21 The Draft EIR included analysis of issues raised
 22 regarding the project's potential impact to agricultural
 23 operations due to increased levels of dust, whether the
 24 project has the potential to increase the severity of frost
 25 incidences in the area. The EIR finds that the proposed

1 project would not result in either of these occurrences.

2 The project would not affect agricultural
 3 operations in the vicinity of Toland. This finding is
 4 supported by studies conducted by Cal Poly Pomona at various
 5 landfills in Southern California that are in close proximity
 6 to agricultural land uses, including citrus and avocados.
 7 These studies indicate the landfill activities do not impact
 8 either immediate production or the long-term viability of
 9 orchards or other agricultural operations.

10 Noise: There are two potential sources of noise
 11 from the proposed project. The first source is from the
 12 heavy equipment itself on the landfill. The noise levels
 13 from the proposed project at the residence in closest
 14 proximity to the landfill would not exceed county standards.

15 The second source of noise from the proposed
 16 project is the increase in waste-hauling vehicles traveling
 17 to the site. Regarding the Santa Clara School, current
 18 noise levels measured at the school exceed county standards
 19 due to the high volume of existing non-Toland related
 20 traffic on Highway 126. Noise levels at the school will
 21 increase over time with or without the project -- and that's
 22 an important point -- as the non-Toland related traffic
 23 volume on 126 continues to increase as a result of continued
 24 growth in the Santa Clara Valley.

25 While the proposed project's contribution to the

1 increase of traffic-related noise at the school is
 2 insignificant, the overall cumulative noise increase due to
 3 non-Toland related traffic volumes on 126 represents a
 4 cumulative significant impact. There are various mitigation
 5 measures that could be employed at the school to reduce
 6 noise levels, but these are beyond the authority of the VRSD
 7 to implement. Therefore, the cumulative non-Toland related
 8 noise levels at the school are considered to represent an
 9 unavoidable impact, and a statement of overriding
 10 considerations will be required.

11 Traffic counts were taken on Highway 126 at Toland
 12 Road, and data from Caltrans was also considered regarding
 13 existing and future traffic volumes on Highway 126. This
 14 table shows existing and future levels of service at the
 15 intersection of Toland Road and Highway 126.

16 As shown, with the exception of making a left turn
 17 from Toland onto 126 and back towards Fillmore, the
 18 intersection remains at a level of service at C or better.
 19 The county considers a level of service of D acceptable.
 20 The level of services of E and F, which are here and here --
 21 again, those are the left turn off of Toland Road going back
 22 towards Fillmore. They are not due to landfill-related
 23 trucks; rather, it is a function of the traffic volume on
 24 126, as vehicles must wait to make a left turn onto 126.
 25 It's important to note the post project will not

1 result in additional trucks making that left turn. There
 2 will be no additional waste coming from Fillmore. It will
 3 be coming from the west county, and it will not result in
 4 that waste, or other areas east of the landfill.

5 The situation of the left turn from Toland onto 126
 6 also is not unique to Toland Road and is not due to the
 7 proposed project. A similar situation occurs at any other
 8 road that intersects into 126 at a tee intersection where
 9 you make a left, such as Sycamore and Hall Road.

10 A signal at Toland Road would result in a level of
 11 service that would meet county standards. However, the
 12 traffic study determined, and Caltrans has agreed, that the
 13 proposed project would not result in traffic volumes that
 14 warrant traffic increase. Highway 126 is within the
 15 jurisdiction of Caltrans, and it will be their ultimate
 16 decision as to whether a signal will be installed at Toland
 17 Road.

18 However, as this is beyond the control of VRSD, and
 19 because the level of service for the left turn from Toland
 20 Road onto 126 is below county standards, this is considered
 21 to represent an unavoidable impact, and a statement of
 22 overriding considerations will be required.

23 During the public speaking process, a number of
 24 people raised an issue regarding the high rate of accidents
 25 on 126. This placard shows the accident rates that are

1 based upon Caltrans' data over the last three years for
 2 various segments of 126 between Santa Paula and its
 3 intersection with Interstate 5.
 4 A number of 1.0 or 1 is an accident rate similar to
 5 the statewide average for similar four-lane roads and
 6 similar conditions. The segment of Highway 126 that
 7 includes the intersection of Toland Road has a rate of 0.3,
 8 which indicates that the accident rate is 30 percent of the
 9 statewide average.

10 Other segments of Highway 126 east of Toland Road
 11 have an accident rate that are similar to the statewide
 12 average as indicated by a number closer to 1. It is
 13 important to note that the proposed project will not result
 14 in increased traffic volumes east of Toland. However, if
 15 waste were diverted to Chiquita or Sunshine, additional
 16 trucks would travel on those portions of 126 east of Toland
 17 through Fillmore over towards the Interstate 5.

18 Another issue raised is whether a truck escape ramp
 19 should be installed on Toland Road. We contacted Caltrans
 20 regarding its criteria for escape ramps. According to
 21 Caltrans, there are various measures that would be more
 22 appropriate prior to installing an escape ramp. These
 23 include signs warning drivers of steep downgrades and
 24 reduced speeds to prevent overheating of brakes.
 25 This table puts the issue of escape ramps into

2.6-10

1 perspective on Toland Road. According to Caltrans, there
 2 are only 14 escape ramps in the entire state of California.
 3 These are on major highways and interstates that have
 4 significant traffic volumes. There are no truck escape
 5 ramps in the county of Ventura, including 101 and the Conejo
 6 Grade.

7 Air quality: Modeling had been accomplished for
 8 the project. The proposed project would not result in the
 9 exceedance of air quality standards at the project boundary;
 10 therefore, onsite emissions would be below a level of
 11 significance.

12 Offsite mobile emissions I mentioned earlier, from
 13 the additional miles traveled to haul waste from the west
 14 county from Ballard or from the area of Ballard to Toland
 15 would result in an increase in air emissions in the region.
 16 These mobile emissions would exceed county standards for
 17 NOX, which is nitrogen oxide. The other criteria included
 18 on that table would be below the level of significance.

19 While the proposed project would result in
 20 significant offsite mobile emissions, these emissions would
 21 be lower than those compared to diverting waste to Simi
 22 Valley, Chiquita or Sunshine. The VRSD will consult with
 23 the Air Pollution Control District and determine if there
 24 are feasible mitigation measures available to reduce offsite
 25 mobile emissions below a level of significance.

1 One option may to continue the successful cash for
 2 compliance program the VRSD implemented as part of the
 3 mitigation for Bailard. However, it is not known at this
 4 time if the emissions can be reduced below the level of
 5 significance, so for the purposes of the Draft EIR, the
 6 offsite mobile emissions are considered to represent an
 7 adverse unavoidable impact.

8 At this time, I'm going to open the floor to those
 9 wishing to make oral comments on the draft, and a reminder:
 10 If you wish to speak, please provide us with your complete
 11 sign-in card, if you haven't already. Your name will be
 12 called, and we ask you to come forward to the microphone,
 13 state your name and address for the record.

14 Again, we ask for your cooperation in limiting your
 15 statements to no more than five minutes, select a
 16 spokesperson, and that you not assign your time to others.
 17 If you have written statements from which you are speaking
 18 tonight, we'd request that you provide us a copy with your
 19 written statement, either tonight or you can mail it to the
 20 District.

21 If you prefer not to speak but have written
 22 comments, again, these may be submitted this evening, or
 23 they may be mailed to the District to arrive no later than
 24 November the 6th. We encourage those of you who may think
 25 of additional comments on the draft after tonight to just

1 submit the comments in writing.
 2 Your input tonight is important to us. We
 3 encourage you to continue to participate and we appreciate
 4 your attendance tonight. Let me turn this podium around and
 5 we'll start.

6 Marjorie Hudson?

7 PUBLIC COMMENTARY

8
 9
 10 MS. HUDSON: I am Marjorie Hudson, 222 North 7th Street,
 11 Santa Paula, California. I have lived in this county for 80
 12 years, and am the daughter of a Briggs district rancher who
 13 came here in the early 1890s, so I have the deepest sympathy
 14 for these ranchers and what they are going through on Toland
 15 Road.

16 I've been out of town for one month and I've only
 17 been back a week, and these are our opinions about the
 18 Toland Landfill.

19 The best description concerning the Toland Landfill
 20 was written by Mary Sue Eastland on October 11th in the
 21 Santa Paula Times. Quote: If the Toland Landfill expansion
 22 becomes a reality, dump-related traffic would thunder
 23 through Santa Paula every minute-and-a-half, as the
 24 best-case scenario offered by the public agency proposing
 25 the change. Worst case, one truck every 50 seconds. Can

1 you imagine one truck rolling through Santa Paula every 50
 2 seconds? That's 210 to 450 vehicles every day travelling
 3 down a country highway that has no dividers beyond Hall and
 4 Toland Road.

5 Traffic and assorted noises and pollution are the
 6 only effects of the proposed expansion that cannot be
 7 mitigated below acceptable standards, according to the draft
 8 Environmental Impact, but leave it to the dream team of the
 9 Ventura Regional Sanitation District. They will mitigate it
 10 if they even have to use untruths.

11 As a former teacher, my heart bleeds for the Santa
 12 Clara Valley School and its students to have to put up with
 13 all this traffic noise and pollution.

14 Most citizens of Santa Paula disagree with the
 15 Environmental Impact Report on the expansion of the Toland
 16 Landfill, and I am also concerned about the effects of
 17 another project in that same area, the Sycamore Ranch quarry
 18 just east of Sycamore Road. This is another project that
 19 should be turned down as it will add more dust and vehicles
 20 on Highway 126.

21 If the dump for Weldon Canyon was bad for Ojai, how
 22 in the world can it be good for Santa Paula? It seems as
 23 though every unwanted project the county wants to dump
 24 somewhere finds its way to Santa Paula. Why is it okay to
 25 dump on Santa Paula?

1 CONT.

2

3

1 When Weldon Canyon was first under scrutiny, Toland
 2 was one of the last likely alternatives, and now, according
 3 to the Ventura Regional Sanitation District, it's the only
 4 alternative now. This, again, sounds just like the dream
 5 team from the O.J. murder trial. They will try anything to
 6 win.

7 The Ventura Regional Sanitation District back on
 8 February 16th approved a budget of a million dollars for a
 9 study to expand Toland Landfill. I read where they paid the
 10 Catholic nuns next to the Bailard Landfill over a half
 11 million dollars so they would quit complaining about the
 12 stench the birds and so forth.

13 I also read where the Ventura Regional Sanitation
 14 District proposes to continue its old vehicle scrap program,
 15 a program that purchases older high-emitting vehicles and
 16 removes them from service to mitigate the air problem. Now,
 17 the trash companies make millions of dollars on the people.
 18 Why are not they paying this tax? Why must we taxpayers
 19 pick it up? Whose money is this? You spend it like it's
 20 going out of style.

21 They will stoop to anything just to win. This is
 22 the taxpayers' money and we are being taken to the cleaners
 23 by these politicians. We taxpayers are getting fed up.

24 Just remember, we had one death on this steep road,
 25 a prominent citizen, when his brakes failed, and he only had

3 CONT.

4

1 a small truck. What in the world is going to happen when
 2 one of these big trash truck's brakes go out, and they are
 3 certainly not immune to failing brakes, and look how these
 4 trucks would endanger lives and vehicles on Highway 126. If
 5 these companies can't keep the emissions down in their
 6 trucks, they're not going to do any better on their brakes.

7 Please think twice before you approve such a
 8 project in this small canyon, and there's one question I
 9 would like answered: When we were here the last time, you
 10 said you had no water for this project, and now I read you
 11 have plenty of water for this project, and I would like to
 12 know where are you getting this water and who is responsible
 13 for this project? May I have answer?

14 MR. MASON: We're not answering questions this evening.
 15 That information is included in the Draft EIR, though.

16 Arnold Dowdy?
 17 MR. DOWDY: Arnold Dowdy, a resident of Santa Paula,
 18 1133 Cliff Drive, also a city administrator for the City of
 19 Santa Paula. Our oral comments are being presented tonight.
 20 We'd also advise you that we will be following up with
 21 written comments before the November 6th deadline.

22 A few comments on the creative logic of your
 23 Environmental Impact Report. The city responded to your
 24 Notice of Preparation and pointed out in that Notice of
 25 Preparation that the expansion of Toland Landfill had a

6

1 major problem if no liner could be added to seal the
 2 existing landfill that is already there. It is our opinion
 3 that no response to that problem that we've pointed out in
 4 the original Notice of Preparation was addressed.

5 Also, there's another issue in the Environmental
 6 Impact Report, and that is the issue of alternative sites.
 7 Six alternative sites were rejected partly due to their
 8 proximity to the famed Weldon Canyon. The creative logic is
 9 that sites close to Weldon should not be evaluated because
 10 the same problem would apply as applied to Weldon itself.

11 The problem, it is our position, is not one of a
 12 technical statute of the Environmental Impact Report, but
 13 the problem is that those sites have been rejected out of
 14 political consideration, not environmental
 15 consideration. It is our position that political
 16 consideration in site selection has no place in your EIR.

17 Also, sites close to Weldon Canyon were rejected in
 18 part because they are privately owned and not publicly
 19 owned. Ventura Regional Sanitation District is an agency of
 20 the state. It has the powers of eminent domain and could
 21 acquire whatever site is best suited for its needs and the
 22 needs of the people that it serves. The fact that property
 23 is in private hands should not be a reason for exclusion
 24 from site selection.

25 Traffic: You've indicated in your reports here,

6
CONT.

7

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1 and you are absolutely correct, that southbound left-turn
 2 lanes on 126 is a level service E -- that's in the a.m. peak
 3 level; and level service F in the evening peaks. The
 4 creative logic here is that the traffic is already bad, so
 5 what does it hurt to make it worse?
 6 Also, because 126 is a state highway and Caltrans
 7 owns and operates the road, VRSD does not have the authority
 8 without Caltrans approval to signalize the location, thus
 9 continuing an already bad problem.

8 CONT.

10 Air quality is another one of the issues.
 11 Emissions -- and this I think perhaps is the secondmost
 12 creative logic applied in the Environmental Impact Report,
 13 in that the report dismisses the idea of air quality
 14 constraints because it is simply a shift from one location
 15 in the county to another.

16 The problem is not quite as simple as that. If the
 17 Ballard Landfill is causing an air quality problem, shifting
 18 it to Santa Paula will not make Santa Paula's air better.
 19 The air quality problems in the Santa Clara Valley
 20 will be significant for many, many reasons, topography and
 21 geography among them. The Ballard Landfill, which has been
 22 identified as creating air quality pollution, is located
 23 very near the ocean with a constant -- almost constant
 24 onshore breeze which disperses the air quality issues over a
 25 plain, the Oxnard plain.

1 The Santa Paula Toland site that you are discussing
 2 is miles from the onshore breezes located in a valley
 3 surrounded by mountains with high peaks, which will serve to
 4 create a punchbowl effect and concentrate the air quality
 5 problems in one location. It will also make the air quality
 6 problems to the east of us increasingly worse.
 7 Mrs. Hudson talked about your program to buy old
 8 vehicles. It's our position in Santa Paula you could buy a
 9 very old vehicle in Thousand Oaks and still not improve the
 10 air quality in the Santa Clara Valley.

9

11 Health risks: Health risk assessment considered
 12 only anaerobic composition and air quality concentrations of
 13 gases. There are other potential health risks not
 14 considered, such as the increased potential of Valley Fever
 15 created from the constant grading necessary in maintenance
 16 of the landfill. East winds created by Santa Anas would
 17 disperse whatever pollutants that are in the dust directly
 18 into the populated areas of Santa Paula.

10

19 Noise: No regulatory requirements are defined for
 20 controlling general noise levels along roadways and
 21 highways. It's difficult to see how even a six-foot wall
 22 could mitigate the noises created on Toland Road from trash
 23 trucks. Is the Board of Supervisors going to be able to
 24 make an overriding consideration that excessive noise at
 25 Santa Clara School does not have to be mitigated?

11

1 You indicated in your report that the noise level
2 at Santa Clara School is already bad, so the mitigation is
3 to make it worse.

4 Now this might seem to be a real small issue, but
5 it's an issue that's near and dear to a good friend of mine,
6 Jack Hogan, who happens to be a professional pilot and
7 somebody associated with the airport, and he brings up the
8 issue of birds. I don't know that anybody has ever been to
9 a landfill -- I don't know that anyone that's ever been to a
10 landfill that you didn't see that it was a constant problem
11 with seagulls.

12 I would point out that the Santa Paula Airport is
13 one of the most significant attractions to the city of Santa
14 Paula. I would also point out that out there in that same
15 general location is an internationally-known aerobatic air
16 school. Airplanes and birds should not flock together.

17 And the last issue, and probably the most
18 significant one, and the one that concerns us probably the
19 most, and should concern us the most for a number of
20 reasons, is the issue of water quality. Santa Paula's
21 number one industry is, has been and always will be
22 agriculture. We're proud of that. We're the citrus capital
23 of the world and we want to stay that way.

24 One of the issues we pointed out is that the
25 existing landfill is not lined. What you have proposed to

2.6-15

(11)
CONT.

1 do is to place a landfill on top of a landfill. You propose
2 to separate those two landfills by a one-foot layer of clay.
3 The liners which separate the existing trash from the new
4 trash should be equally as good or better than the -- as the
5 four-foot thick, six-layer liners that are used under new
6 landfills that are created elsewhere.

7 You take an existing landfill with a history of
8 millions of tons of trash, put a one-foot layer of clay over
9 the top of that, and then take and place millions and
10 millions upon top of millions of tons of trash upon that.

11 Any logical person, not using creative logic, can see that
12 that one-foot layer of clay will shift, will subside, will
13 break apart, will be created into different levels, and
14 ultimately this tremendous downward pressure will cause a
15 leach aid to be squeezed out.

16 That leach aid will then enter the groundwater
17 system at some point of time in the future, creating
18 potential impacts to the city of Santa Paula, its
19 agricultural base and its economy.

20 Our written comments will follow. Thank you.

21 MR. MASON: Thank you. J. Roger Myers.

22 MR. MYERS: I'm J. Roger Myers. I'm the city attorney
23 for Fillmore. My address is 5425 Everglades in Ventura,
24 Suite 100. Our written comments will follow, also.

25 First of all, I'd like to say, and sort of

(13)
CONT.

1 reiterate, one comment that Mr. Dowdy made, although I would
 2 expand that, the fact that VRSD should have paid more
 3 attention to the comments in the initial study. Those
 4 comments are set forth in your EIR Appendix A.

5 The comments of Fillmore and others, which included
 6 Cal EPA, Caltrans, County Public Works and other local
 7 agencies and affected landowners on the initial study we
 8 would submit were not seriously considered. There was no
 9 response to these comments in the EIR and the initial study
 10 was not modified. The City of Fillmore would incorporate
 11 its prior comments on the initial study and those of EPA,
 12 Caltrans, County Public Works, County Flood Control and the
 13 City of Santa Paula.

14 Secondly, as we heard in the initial study
 15 comments, we don't believe VRSD is the appropriate lead
 16 agency. VRSD is the landowner and the developer. The
 17 county is the permitting agency. It is not appropriate for
 18 the developer to certify an EIR of its own project. The
 19 permitting agency, the county, must independently determine
 20 whether the EIR complies with the California Environmental
 21 Quality Act. I'd refer you to see CEQA Guidelines 15051.

22 Expanding, or maybe just supplementing, what
 23 Mr. Dowdy said a minute ago, we believe the project
 24 description is misleading. This should be treated as a new
 25 project. A new landfill on top of an old unlined landfill

1 is not an expansion of an existing use. A 12-fold increase,
 2 from 135 tons per day to 1500 tons per day, to a height of
 3 210 feet, which is over 22 stories, cannot be characterized
 4 as a modification of an existing use. To do so is like
 5 calling a skyscraper a remodel of a bungalow. The impact of
 6 two landfills are not comparable.

7 This improper project description distorts the EIR
 8 in many ways. For example, the EIR's conclusions regarding
 9 potential nuisances at 3.14 does not analyze the nuisance
 10 potential of insects, rodents, birds, odors and so forth of
 11 this project. The EIR relies almost exclusively on the
 12 existing operation at Toland for its conclusion that there
 13 will be no significant nuisance impacts. No meaningful
 14 analysis of the nuisance potential of the operation
 15 magnified 12 times is made. That's what you have here.

16 The project description is also fatally flawed
 17 because it purports to limit the flow of in-county waste.
 18 The Supreme Court has invalidated flow controls on foreign
 19 waste. The most recent in the US Supreme Court is the
 20 Carboni versus Clarksdown case, which was decided last year.
 21 That's at 114 Supreme Court, 1677.

22 The EIR should assume that flow controls are
 23 illegal or impractical. This misleading project description
 24 causes the traffic energy and air quality impacts to be
 25 underestimated.

1 The environmental review is curtailed by the stated
 2 objectives of the proposed project. I'm referring now to
 3 1.2.1 to 2.2. The EIR stated objectives of the proposed
 4 project effectively exclude any meaningful analysis of
 5 alternatives. After Ballard closes, Toland will be the only
 6 existing in-county landfill with any additional in-county
 7 waste disposal capacity. I'm quoting now. No other
 8 alternative could ever meet the objectives of the proposed
 9 project.

10 Low cost disposal is not an environmental
 11 objective. The more expensive the disposal, the more likely
 12 conservation will actually occur. We would recommend that a
 13 broader statement of project objectives would allow for a
 14 meaningful comparison of alternatives.

15 We would next suggest that the statement of need
 16 for the proposed project, 1.2.2, is misleading. As with the
 17 statements of objectives of the proposed project, the
 18 statement of need for the project effectively eliminates
 19 alternatives. The need statements ignore the fact that
 20 surrounding landfills are all operating at less than
 21 capacity and assumes that none of these landfills will
 22 continue to accept waste.

23 That's in spite of the fact that the EIR discloses
 24 that Simi Valley, for example, is operating at one-third of
 25 its tons per day. And Chiquita Canyon is accepting less

2.6-17

1 than one-half of its tons per day and plans to double its
 2 tons per day and expand its capacity by 30 million tons.

3 I know that you don't answer questions, per
 4 Mrs. Hudson's, but I have a question, at page I-7, number 3,
 5 as to who determined -- who estimated that Ventura County
 6 has only nine years of landfill capacity.

7 I think that the alternative analysis is
 8 self-serving. Because the VRSD has limited the project
 9 objectives so as to only include Toland, falsely assumed the
 10 need for additional landfill capacity in the short and long
 11 term, and incorrectly described the project, its alternative
 12 analysis is meaningless.

13 If the project objective is a yellow house at the
 14 corner of First and Main with ten bathrooms and five
 15 bedrooms, no other alternatives will be given consideration,
 16 at least serious consideration.

17 We would also submit that the project is
 18 inconsistent with the policies of the General Plan. The
 19 Ventura County General Plan has strong policies protecting
 20 agricultural uses. The project is incompatible with
 21 adjacent farmland and will encourage further destruction of
 22 farmlands in the Santa Clara Valley. I think you're going
 23 to hear more on that from some of the landowners.

24 Many of the potential impacts on the project are
 25 not adequately disclosed. The real potential impacts of the

20 CONT.

21

22

23

1 project are not disclosed. The VRSD relies almost
 2 exclusively on existing operating procedures at Toland for
 3 its assumption that significant impacts will not occur, or
 4 future operating procedures in compliance with local, state
 5 and federal laws and remedial measures if impacts do in fact
 6 occur. This type of analysis does not comply with CEQA.

(24)

7 An EIR is first required to disclose the
 8 significant impacts, then describe measures to avoid or
 9 reduce the significance of each impact. If an impact cannot
 10 be reduced to insignificance, the agency must disclose this
 11 and make findings that justify approving a project with
 12 significant impacts. This required disclosure is admitted
 13 in the EIR by improperly deferring analysis of potential
 14 impact to future studies.

(25)

15 Some of the potential impacts would include,
 16 although they are not limited to, impacts from special
 17 permitted potentially hazardous waste, we discussed that at
 18 2-22; the use of an alternative experimental cover, we
 19 discuss that at 2-24; the impact of placing over 20 stories
 20 of trash on the unlined old landfill.

21 Many of your mitigation measures are vague. Many
 22 of the mitigation measures are too vague for meaningful
 23 analysis. Some of these have already been covered by
 24 Mr. Dowdy.

(26)

25 Also, with respect to your bird issue, what about

1 the condor sanctuary in our Santa Clara Valley?
 2 We would also submit that a more detailed geologic
 3 and soils investigation should be conducted. There is
 4 evidence of active faults in the area, slope creep,
 5 landslides, soft underlying bedrock, mass movement, mudflows
 6 and debris flows. In your EIR, the detailed geological
 7 investigation is deferred until excavation, and the landfill
 8 would be used as a buttress.

(26)

(27)

9 We'll submit the rest of our comments in more
 10 detail and our citations in our written response. Thank you
 11 very much.

12 MR. MASON: Thank you.

13 I know that everybody has a lot of comments, but
 14 this is going to take a while. We have the room for another
 15 hour. I'd again ask if we could try to limit our statements
 16 to five minutes.

17 Joanne King?

18 MS. KING: I represent Valley Advisory Committee, which
 19 is a representative committee of landowners in Fillmore, and
 20 from about Hall Road east to the Ventura County line.

21 We've been looking for a long time at the evolution
 22 of this project. We have a real concern that, because of
 23 other projects, the S.P. Milling project, that have some of
 24 the same impacts, that there needs to be an extension of
 25 time to evaluate cumulative issues. Each project in itself

(28)

1 requires a certain time, but together, I think we need to
 2 look at the cumulative issues of some of the traffic, some
 3 of the water degradation problems, the geology. There's a
 4 bunch of things that need to be looked at, so we as a
 5 committee are requesting an additional time to study and
 6 address these issues.

7 However, in the meantime, we have looked at some of
 8 them, and I would like to say some of the things that we are
 9 concerned about.

10 On the location and the project setting
 11 description, it should include the Toland Road elevations
 12 with the steepness of the grade, which will very markedly
 13 impact the truck traffic, climbing that grade full, idling
 14 while waiting, entrance, and then braking on their return
 15 and decelerating.

16 If anyone has gone up that road, the degree of
 17 climb is marked, it's exceptional, and if you looked at the
 18 lines of trucks waiting to get into Bailard, we'll have a
 19 similar situation on that. In heavy peak times, this could
 20 go on for several hours, and certainly your projections
 21 based on a plot plan looking at it from an aerial view does
 22 not show this aspect at all and this should be taken into
 23 both your traffic and pollution studies.

24 The site history should include mention that the
 25 former waste shed plan for this county designated Toland as

26-10

1 fulfilling the Santa Paula and Fillmore taxpayers' landfill
 2 requirements for about 50 years or more, and that Fillmore
 3 and Santa Paula, Fillmore particularly, had been meeting
 4 their source reduction and recycling requirements of AB939.
 5 We feel as if this kind of a move is penalizing our
 6 efforts and that we are having to pull the line both with
 7 our tax dollars and our air quality because other people
 8 haven't done their jobs.

9 We feel, in addition, that the need for this
 10 proposed project is generated many miles away by inadequate
 11 plan implementation in the cities of Oxnard and Ventura, not
 12 by Santa Paula and Fillmore. And we also are cogent of the
 13 fact that we've had several very expensive studies and at
 14 least 33 sites have been looked at in depth for lots of
 15 bucks, taxpayer dollars, and they have not said that Toland
 16 was one of the best places. Again, why should the Santa
 17 Clara Valley be penalized?

18 Recycling and sorting facilities are nowhere near
 19 Toland and should be viewed as an added transportation cost
 20 that would be much less with closer landfill sites. This is
 21 a real concern, to add extra dollars, extra expense, extra
 22 road damage, extra pollution from the traffic, because of
 23 that kind of shuttling back and forth of the trash. We
 24 don't feel that's been adequately addressed.

25 Discussion of composite liner in this geologically

28 cont.

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32

1 faulted site, again, to reiterate what the last speaker
 2 said, does not adequately address failure and contamination
 3 of the aquifer downstream. Most mention of any potential
 4 failure this composite liner by earthquake faulting and
 5 water seepage -- okay, this talks again about the
 6 contamination plume of our aquifer, and it is definitely
 7 significant. I don't see how that could be called
 8 insignificant.

9 One of our final things is that the disturbance of
 10 the natural seep there, again, having to do with hydrology,
 11 has a very minimal setback of 50 feet. Certainly if the
 12 project goes forward, that would be a very clear danger to
 13 the integrity of whatever structure is there.

14 I will make one commendation. I thought that there
 15 was at least a detailed scenario of what will occur if any
 16 cultural resources are discovered. It's too bad the rest of
 17 the study did not have that kind of thoroughness.

18 Again, our advisory group would request additional
 19 time before the EIR hearing. Thank you.
 20 MR. MASON: Thank you. Linda Bartelsen.
 21 MS. BARTELTSEN: My name is Linda Bartelsen. I live at
 22 402 San Miguel in Santa Paula.

23 I'm here tonight to tell you my story. August 26,
 24 1983, was a very memorable day in my life and in the life of
 25 my family. That was the day I was in a head-on collision

1 with a truck on our notorious Highway 126 between Santa
 2 Paula and Fillmore. The driver was suspected of having
 3 fallen asleep and had crossed into the lane of oncoming
 4 traffic, my lane; 126, whose record of fatalities had even
 5 in 1983 placed it in the top ten for this state. It's
 6 probably moved up on that list today.

7 The car was totaled. My daughter in the back was
 8 spared and, but by the grace of God, I came so close to
 9 never seeing another sunrise. As it was, I had multiple
 10 nose fractures, a cracked rib, a severed facial vein and
 11 cuts and bruises in places I didn't know were part of my
 12 body. I hurt everywhere.

13 But the man in the camper in front of me wasn't as
 14 lucky. The cab of the truck had rolled over on him and
 15 crushed him, leaving five children instantly fatherless.

16 Why do I tell you my story? Because I know that by
 17 expanding the Toland Road Landfill, there will not just be
 18 more traffic, but more accidents and more fatalities, and
 19 the people of Santa Paula and Fillmore are the most at risk
 20 because we travel 126 more frequently than most other
 21 Ventura County residents.

22 These are my friends. These are my neighbors.
 23 These are my family members. We are real, we have names and
 24 we have faces. Our survival shouldn't be dependent on a
 25 mere convenient corporate decision.

1 I don't have to tell you that when the Toland Road
 2 Landfill was first developed, it was never intended to later
 3 be expanded. That's also been gone into tonight by others.
 4 When 200-plus trucks per day are added to 126, I don't have
 5 to tell you the statistics on the resultant emissions that
 6 would not only poison and pollute our environment, but would
 7 negatively affect the production of our agriculture. Yes,
 8 agriculture, whose marketing success is crucial to the
 9 viability of our entire county. I don't have to tell you
 10 that the resultant overuse of our local water system and
 11 seepage will destroy our water resources and threaten our
 12 entire valley, fertile valley.

13 No, you are aware of all of these facts,
 14 disregarding them and proceeding head-long into making this
 15 a done deal. Well, slam dunk. And public hearings are just
 16 a troublesome requirement that will soon be over.

17 I am here to appeal to you not only as a private
 18 citizen and a survivor of 126, but as a wife and a mother.
 19 You cannot disregard the increased risk of accidents,
 20 injuries and fatalities that you will be inviting to Highway
 21 126 and its access roads if this dump site is expanded.

22 Make this personal if you have to in order to hear
 23 what I'm saying. Think of your own family's increased risk,
 24 if they lived in our communities and had to use 126,
 25 perhaps daily to go to work, to go to school, to get to

1 Interstate 5, to go any place in northern or southern
 2 California. We're talking about a major artery to any place
 3 that we need to go outside of this county, much of which is
 4 a two-lane highway.

5 I appeal to your consciences. If you go ahead with
 6 this expansion, you cannot escape the responsibility for the
 7 carnage on 126, which is sure to increase. Think about this
 8 seriously. Lives are not trivial things, and once this
 9 decision is made, it will be irreversible. Thank you.

10 MR. MASON: Ofelia De La Torre.

11 MS. DE LA TORRE: Okay. My name is Ofelia De La Torre.

12 I live at 1225 Fremontia Street, and I'm here representing
 13 myself and many people, I suppose. I was born and raised in
 14 Santa Paula. I won't say my age like Marjorie did, but many
 15 years ago. In fact, I lived next door to the burning dump
 16 on South Palm, which was many, many years ago. And to this
 17 day, when I pass through there, I still see our house next
 18 to the dump, the burning flames and the smell. It was
 19 horrendous, and I thought that when it moved over to Toland
 20 it would be a lot better, but I guess now I see a danger in
 21 the expansion of Toland Park.

22 As a citizen of Santa Paula, I happen to like the
 23 clean air that we now enjoy. My uncle, who lives in Los
 24 Angeles, visits us occasionally and he would always say, oh,
 25 boy, this is God's country. Well, if we have that

1 I feel that -- well, anyway, I hope that the Board
 2 of Supervisors votes you down. I hope that you select
 3 another site. I hope that you find another way. I would
 4 hope that each city can be responsible. I hope you would
 5 find that each city would be responsible for their own
 6 trash, for their own pollution, for their own smell and
 7 hopefully for their own trash.

8 I really oppose this and I hope that the District
 9 will see to it to go somewhere else, because I don't want to
 10 die on this highway and I'm sure that Santa Paulans and
 11 Fillmore people don't want to die there either. Thank you.

12 MR. MASON: Thank you. Mike Shore.

13 MR. SHORE: I'm Mike Shore. I reside at 19659 East
 14 Telegraph Road. I operate a citrus and avocado ranch there,
 15 which I own. I've lived there for 30 years, and I want you
 16 to know that this area around Toland Dump is one of the
 17 finest areas in the county, perhaps if not the state, for
 18 growing the things that we do grow, particularly lemons and
 19 avocados.

20 We do have a neighborhood. There are people that
 21 live out there in that area and they raise things and they
 22 do it very well. Somehow the Environmental Impact Report
 23 doesn't seem to realize that it's like it was just a vacuum
 24 out there, that there are people living there and farming.
 25 I went to the original appearances for Toland Dump

1 expansion, it will no longer be God's country. I know that
 2 your EIR says that, you know, everything will be really
 3 good, you know, it won't affect the air, it won't affect the
 4 traffic, but I don't believe that that's the case.
 5 I served on the Grand Jury last year and at that
 6 time I was not allowed to talk because I too close to
 7 someone here in Santa Paula, so if you think I'm venting,
 8 this is my chance, so I'm going to say what I feel.

9 Just because Bailard Landfill will close, why does
 10 it have to be Santa Paula who has to pay? We are always
 11 chosen because we are a small town. People thought maybe --
 12 maybe the District thought we wouldn't mind, but we do mind.
 13 We mind very much. We do not like the increased traffic.
 14 I've heard the other ladies talk about the increased
 15 traffic. I have a daughter, son-in-law, my two
 16 grandchildren that live in Fillmore. We travel this road
 17 many, many times. Already it is trafficky. If you stop at
 18 Yamaguchi's and want to cross back down, it is next to
 19 impossible sometimes.

36

20 So the trucks will be increased, there will be much
 21 more traffic. There will be more fatalities. I know you
 22 say maybe just 30 percent of the state. Even if there are a
 23 few more lives lost, that's a lot. That's a lot, because
 24 it's one of us, people in Santa Paula or people in Fillmore,
 25 more likely.

2.6-22

1 many years ago, and we had the same feelings at that time,
 2 the same opposition; and at that time, the county government
 3 assured us that this would be a regional dump, and that was
 4 it. There were no time limits. It was indefinite. It was
 5 to be a regional dump.

6 So if this -- I feel that if this is allowed, if
 7 this expansion, this vast expansion is allowed, why, then --
 8 then why do we have county planning? Why do we have green
 9 belts, if these things can just be shunted aside at the whim
 10 of an agency. I just don't think it's proper, and so my
 11 question is what's next? Will we have strip malls, factory
 12 outlets, perhaps a McDonald's at Sycamore Road and
 13 Telegraph? Another thing I'm curious about, I
 14 really don't know who is for this thing. I mean, there are
 15 a lot of us that are opposed. I've been to all the public
 16 hearings and not at one have I heard anyone that's for this
 17 except the people, of course, from the Regional Sanitation
 18 District.

19 I know somehow -- this week in Time Magazine there
 20 is a guy by the name of Carver and he's from Nye County,
 21 Nevada, and he was kind of fed up with government, and I
 22 think somehow I sympathize with Mr. Carver.

23 The Environmental Impact Report, I feel it's

24 just -- it's just lacking. It doesn't really deal with the
 25 environment. The environment around Toland Dump consists of

37

1 a lot of agricultural land and it's not just -- there's also
 2 range land. Nobody has really mentioned that, but a lot of
 3 good friends of mine raise cattle in and around Toland Dump,
 4 above it -- Morey Caldwell, Bob Culbertson. I know there
 5 are others that make a living raising cattle above it, and
 6 then we all raise our citrus and avocados around it.
 7 It's an expanding agricultural area. It's not just
 8 static. New groves -- the general area is actually
 9 expanding. New avocado plantings are being -- land is being
 10 cleared, avocados are being planted. There's also a lot of
 11 vegetables that are being grown in newly-planted groves
 12 along the river bottom.

13 Let me see. Well, anyway, the whole thing is -- it
 14 sort of yields to things like Indian remains and other --
 15 you know, this Environmental Impact Report, but I don't
 16 think Indian remains really are of much importance, somehow,
 17 when you consider the traffic, the noise, the dust and the
 18 general nuisance; and then also, if this thing were to go
 19 through, somehow I don't think it's going to do anything to
 20 enhance the value of my land. It will just certainly
 21 degrade it. So that's really about all I have to say.
 22 Thank you.

23 MR. MASON: Thank you. Rachel Kimball.

24 UNIDENTIFIED SPEAKER: She's not speaking.

25 MR. MASON: Bruce Ansalmo? I'm sorry if I mispronounced

37
CONT.

1 that. Jack Beebe? Oh, sorry.
 2 MR. ANSELMO: My name is Bruce Anselmo. I live in
 3 Ventura at 5108 Cypress lane. I have been a resident of
 4 Ventura County for 38 years, growing up here, hiked in many
 5 of its canyons. It's a beautiful area and I hope -- at
 6 least it's my hope that we can keep some of these pristine
 7 canyons and areas the way that I remember them, because so
 8 much has changed, unfortunately.

9 Because of that belief and many other reasons, I am
 10 also a member of the board of the coalition to stop the
 11 Weldon Canyon Dump, and in that effort, which has been over
 12 six years now, I have attended many meetings like this,
 13 heard many people's concerns about a new landfill going in
 14 their neighborhood and how it's going to change their lives.

15 It is the coalition's position that Ventura County
 16 does not need a new landfill. Number one, why we don't need
 17 a new landfill is that recycling has been so successful.
 18 We're now reaching the point in the year 2000 where we've
 19 been able to cut our trash to landfills by half. As a
 20 result of this, there is landfill capacity throughout
 21 Southern California and other states. There are trash
 22 companies asking for trash.

23 Another reason is that Ventura County now -- the
 24 cities of Ventura County have become organized enough to be
 25 able to negotiate with trash companies who operate existing

2.6-24

1 landfills so that they would take our trash at the lowest
 2 cost, and, believe me, this has been an effort that has
 3 required many years of hard work so that we would have the
 4 mechanism in order to do this.

5 What happens when you don't build a new landfill?
 6 One thing you do is you encourage more recycling. You don't
 7 discourage it. Another thing you do is that you encourage
 8 new industries that use recycled materials. The people can
 9 start seeing the benefit of cutting down their trash because
 10 they know they are preventing new landfills from coming into
 11 their neighborhoods.

12 We believe that now is the time to explore further
 13 alternatives rather than building a new landfill in Ventura
 14 County. I want to thank you.

15 MR. MASON: Thank you. Jack Beebe?

16 MR. BEEBE: Good evening. My name is Jack Beebe. I'm
 17 an attorney from Ventura with the firm of Muegenburg, Norman
 18 and Dowler. I appear tonight in somewhat of a double
 19 representative capacity, in that our firm represents 60 or
 20 so people of the people here in the community and --

21 UNIDENTIFIED SPEAKER: Can you put the microphone up so
 22 we can hear you?

23 MR. BEEBE: Is that better?

24 I'm also here tonight in the stead of Robert
 25 Sawyer, who is the firm's lead attorney representing these

1 folks. Many of our clients are also here tonight to make
2 their own individual presentations, and others will be
3 submitting individual written comments.

4 As our firm will also be submitting detailed
5 written comments, my purpose here tonight is not to address
6 every issue of the Draft EIR, but simply to voice our
7 clients' concern for the record, in four major areas in
8 particular.

9 It's no secret that our clients are steadfastly
10 opposed to the expansion of the dump. The reasons for their
11 opposition are many and transcend the narrow range of issues
12 raised by the environmental impact decision process. But
13 suffice it to say, for now, that the proposed expansion is
14 not consistent with the highest and best use of this land,
15 which is long-term agriculture, particularly citrus and
16 avocados.

17 The nature of the proposed expansion is such that
18 most, if not all, of our clients will continue to oppose it
19 even in the event that all the environmental issues are
20 addressed.

21 Let me address four items very quickly, if I can.
22 First, CEQA now requires that projects be analyzed with
23 respect to and consideration of both aesthetics and cultural
24 resources. As confirmed by and in numerous articles that
25 have appeared in a number of travel magazines, newspaper

2.6-25

1 travel sections and lifestyle magazines such as Sunset, the
2 rural corridor between Castaic and Santa Paula is a tourist
3 attraction in its own right, and is in fact an attraction
4 which draws visitors to both Santa Paula and Fillmore. The
5 corridor's appeal is further enhanced by Short-Line
6 Enterprises train rides on the Fillmore and Western.

7 The projected increase in dump-related traffic and
8 the very existence of the expanded dump itself, whether or
9 not it's visible from the highway, would most certainly
10 change the way potential visitors regard travel on Highway
11 126.

12 I listened with interest at the outset of this
13 meeting as we heard from, at least in a representative
14 capacity, Caltrans, and their suggestion that a truck
15 runaway ramp or safety ramp is not necessary there, but
16 rather signs would solve the problem.

17 I can't confirm this yet, but I will as soon as I
18 leave this meeting. I don't believe the brakes on my car
19 can read. And I have to wonder, too, if Caltrans has
20 experienced such major success with signs along the freeway,
21 then we've got a lot of Highway Patrolmen with a lot of time
22 on their hands.

23 The Draft EIR fails to analyze the effect which the
24 shortening of the life of the dump would have on Santa Paula
25 and Fillmore. These communities would be forced to find new

1 landfill sites decades earlier than if the dump remains
2 within its present permit specifications.

3 Third, the analysis of potential dust pollution and
4 its effects upon local crops is woefully short. It relies
5 primarily upon anecdotal descriptions of another unrelated
6 site that may or may not be a proper model for the Santa
7 Clara Valley, rather than upon a careful analysis of what
8 will actually happen at Toland.

9 Finally, the analysis of the increase in pollution
10 from automotive exhaust, particularly at Santa Clara School,
11 is incomplete. The Draft EIR does not sufficiently take
12 into account the fact that not only will the expansion
13 increase the level of use of Highway 126 at Toland Road, but
14 it will inevitably create significant back-up of trucks
15 right in front of the school, trucks which, when opposing
16 traffic permits them to finally make the left turn up the
17 road, will have to gear down to start climbing up that
18 grade.

19 The Draft EIR considers the increase solely in
20 terms of numbers, ignoring the fact that a truck waiting in
21 line to make a turn, going nowhere, but with its engine
22 running, will generate far more noise and pollution at that
23 specific site than will a truck that's just traveling by at
24 55 miles an hour on its way to Castaic.

25 Fortunately, at this point, there is a "D" that

2.6-26

1 precedes the E-I-R, and that is Draft of the Environmental
2 Impact Report. I might suggest that, after my perusal of
3 this item -- and for those of you who haven't had a chance
4 to yet, pour yourselves a cup of coffee and sit down and
5 with a red pen go through and look for the items which it
6 doesn't address, because I submit that that "D" could very
7 easily be transferred to stand for deficient.

8 This publication does not begin to address the
9 number of issues which exist there. Behind me is a
10 representative section of the Santa Paula community. They
11 are, in essence, a force to be reckoned with, not that that
12 should pose a threat to the officials in their capacity as
13 they try to move this project forward, but consider this, if
14 you will: That these people, in particular Mrs. Hudson, who
15 opened the meeting for us, have 80 years of experience
16 living in this community.

17 If anybody knows this area, knows it like the back
18 of their hand and knows what's good for it, they do. Listen
19 to them, take their wisdom, take their advice to heart, so
20 that the deficiencies that appear in this publication at
21 this point don't come back to haunt you in ways that will be
22 far more implicating and reaching than they are at this
23 point. Thank you.

24 MR. MASON: Peggy Kelly.

25 MS. KELLY: I also wanted to remind everybody first,

1 though, when you submit your written comments, don't forget
 2 to cover copy all the newspapers, letters to the editors,
 3 each member of the Board of Supervisors, and I certainly
 4 hope that the transcript of this taken by the court reporter
 5 will also be completed and given to them in that state to
 6 reflect the full hearing.

7 Anyway, I think everybody has pretty well gone
 8 through a lot of the environmental concerns. I don't want
 9 to repeat things that have been eloquently and truthfully
 10 addressed. I know that the traffic that occurs at the Hall
 11 Road turnoff, considering the traffic that goes up there,
 12 there's no comparison there. We've got the dust, the smog,
 13 the noise, the road hazards, the school, our pest control,
 14 agricultural issues.

15 There was a new study just released in the last two
 16 weeks, I believe, that shows that there is a 40 percent
 17 higher rate of congestive heart failure for senior citizens
 18 on peak smog days. I would certainly hope that would be
 19 included in any future studies. The Santa Clara River
 20 Valley is a mecca for seniors, and a goodly portion of our
 21 residents are senior citizens.

22 Traffic could trigger more landslide activity on
 23 South Mountain Road, which I suspect at times is maybe due
 24 to minor earthquake activity, because Toland Road Landfill
 25 does sit, as the rest of the Santa Clara River Valley does,

45

46

1 between two mountain ranges that have been proven that are
 2 moving closer together and are expected to really let rip
 3 one of these days. That would be a double disaster with a
 4 landfill here in our valley.

5 On the Santa Paula Airport, the birds was brought
 6 up. That hasn't been addressed at all. It was questioned
 7 before. There's a lot of things -- I've been to all the
 8 meetings -- that aren't in the Draft Environmental Impact
 9 Report. It's very disappointing at this point.

10 Oh, I noticed, too, that you said it would be used
 11 for county waste or county-processed waste only. I wonder
 12 if that means that trash could be imported into the county,
 13 processed into the county, and then taken to the Toland Road
 14 Landfill. I didn't quite understand that.

15 Another thing I have great concern with is the
 16 temporary -- I saw a classified ad for a temporary PIO,
 17 public information officer. Now, that's paid by taxpayer
 18 money, too, and I'm quoting from the ad: Develop and
 19 implement community information strategies aimed at
 20 increasing public awareness and support for potentially
 21 controversial projects by addressing community and political
 22 concerns.

23 Now, using Arnie's creative logic, I've considered
 24 the PIO issue an environmental concern; to me personally it
 25 pollutes my sensibilities, that we would be paying for

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46
CONT

1 someone to shmooze us for something that we know is wrong.
 2 I think that's a misuse of public monies.
 3 I think when people get up here and talk about
 4 their concerns and they are not addressed and they are
 5 legitimate concerns, I also think that's a misuse of public
 6 monies. We have real problems here. It's very discouraging
 7 to look at the EIR and see that the real problems are
 8 completely muddled over or whatever, when -- and this is
 9 supposed to be public, public input. So I really want to
 10 encourage everybody to make sure that you get all your
 11 written comments in, and get them in everywhere, just not
 12 right here tonight. Thank you.

2628

MR. MASON: Gordon Kimball.

14 MR. KIMBALL: My name is Gordon Kimball. My address is
 15 89 Pino Court, Camarillo, California. I'm here tonight
 16 representing my family.

17 We farm approximately 100 acres of avocados, on
 18 that photo immediately adjacent, I consider, to the dump.
 19 We currently look over the dump. When you get through with
 20 this project, the dump will tower over us.

21 I've read your draft report and I have a number of
 22 questions.

23 Why does the rainwater runoff from the area around
 24 the operations and maintenance area require collection for
 25 special treatment? I don't understand why water falling not

1 on the dump, but just around buildings, requires that you
 2 collect it in a separate tank and haul it away for
 3 treatment. What are you doing to it?

4 You mentioned gas flaring. Will the gas flare
 5 operate 24 hours a day, seven days a week? How many years
 6 after the closure will flaring be required? What will be
 7 the fire risks in a very high fire risk area with a flare
 8 existing in severe east wind?

9 Why will there only be a leach aid control and
 10 recovery system, not a full liner in the area of the
 11 existing dump, when a full liner would be required if you
 12 were building a new dump of the size you are building now?

13 How will you eliminate the possibility of brush
 14 fires in a high brush fire area?

15 What is the traffic count daily now currently at
 16 Ballard and why is it not referenced in your calculations?
 17 This is a true traffic count, not a predicted one. You know
 18 how much traffic there is. Why don't you tell us?

19 You vaguely discuss a stormwater retention basin.
 20 Gentlemen, that's a huge area to collect water from, and yet
 21 there is no description other than a little black dot. How
 22 big will that detention basin be required to be? What will
 23 be the maximum water release rate from that detention basin?

24 What will be the method of release of water? How will the
 25 release be controlled? How can we be sure that we won't

1 have 50 acres worth of stormwater coming down that canyon?

2 Dust. No discussion has been made in your draft

3 EIR of how mud and dirt carried out onto Toland Road by

4 vehicle tires, fenders and mud guards will be eliminated

5 before it dries and turns into dust deposited on adjoining

6 orchards. You only need to drive down Victoria Avenue by

7 the current Ballard to get a sense of the amount of dust

8 carried out on public roads by an operation. And there's

9 absolutely no reference at all made to that.

10 The use of the Piru ABC dust data to evaluate and

11 use your dust model is completely invalid. The Piru area is

12 entirely different. There's a narrow area in the valley

13 there. There's a tremendous exposed amount of river area

14 and it's far dustier out there than it is in our area.

15 No mention is made of the Ballard Landfill dust

16 situation. Your only reference of the effect of landfills

17 on agriculture are hundreds of miles away. I don't care

18 about the operations of landfills in San Bernardino County.

19 I want to know how the operation of landfills in Ventura

20 County will affect my agriculture.

21 Why were the agricultural neighbors of the current

22 landfill not surveyed? I can tell you from my brief survey

23 why. You sure wouldn't want that information in this

24 report.

25 Litter. How will windborne trash such a plastic

2.6-29

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1 grocery bags be controlled? A four- or six-foot plastic

2 fence will not catch that material. In your report, you

3 actually conclude that, with the opening of this dump,

4 increasing in size and increasing hours, that the amount of

5 illegal dumping along Toland Road will go down. I don't

6 understand how you can go from 70 vehicles a day to over 400

7 and include all the trash from the west county and believe

8 that illegal dumping will go down. What is the current rate

9 of illegal dumping activity around Ballard? That should be

10 a clear clue.

11 Who will be responsible for hazardous waste

12 illegally dumped on adjoining farmlands, as it has been at

13 Ballard. Why were the neighbors of Ballard not surveyed

14 about litter problems?

15 Water. You state that you have several potential

16 sources for water and you describe the water in the Santa

17 Paula/Fillmore basin as being oversupplied and not in an

18 overdraft. First I submit, as one who has paid to drill a

19 well in that area, there is not just a giant bowl of water

20 down there. The ability to get water out is very limited in

21 that area and any water withdrawals from that area will have

22 an effect.

23 There's been no discussion of water availability in

24 the event of a drought. Gentlemen, in the event of a

25 drought, which is inevitable, there will inevitably come a

55

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12 illegally dumped on adjoining farmlands, as it has been at

13 Ballard. Why were the neighbors of Ballard not surveyed

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16 sources for water and you describe the water in the Santa

17 Paula/Fillmore basin as being oversupplied and not in an

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24 the event of a drought. Gentlemen, in the event of a

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24 the event of a drought. Gentlemen, in the event of a

25 drought, which is inevitable, there will inevitably come a

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CONT.

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1 time where Fillmore basin becomes an overdraft. At that
 2 point, even today, there are well-recognized overdraft
 3 mitigation makers, and there's no discussion of what
 4 priority you will have for water, as a recent user and as an
 5 expropriator of water. Those need to be included in your
 6 report. If you don't have water, you can't collect trash.

58

CONT.

7 Relative to noise, no consideration has been given
 8 to the additional noise, and, for that matter, emissions
 9 generated by trucks due to the grade on Toland Road.
 10 Everybody knows that a truck going up and down a steep hill
 11 makes far more noise and for more emissions than a truck
 12 cruising on level road.

59

13 Safety. You have concluded that a turning lane of
 14 40 feet length off 126 is more than adequate. Gentlemen, I
 15 ask, how long is a transfer truck and how many transfer
 16 trucks will fit in a 40-foot long left-turn lane?

60

17 The Toland Road grade is acknowledged to be
 18 dangerous. It has already claimed one life. There is no
 19 mention at all of the consequences of a vehicle failing to
 20 stop at Toland Road and coming uncontrolled across 126.
 21 That clearly is a potential and clearly needs to be
 22 addressed. Will no danger mitigation take place until there
 23 is an accident?

61

24 And my last comment is regarding frost effects.
 25 Gentlemen, you will have an effect on the frost in the

1 agriculture in the area. Frosts are often marginal, and any
 2 change in wind draft patterns will result in stagnant air
 3 pockets and/or skips in ground level air movement.
 4 Your analysis is conducted on a gross volume of
 5 area basis. Freezes often occur on a one- to five-acre
 6 basis. I will submit my written reports. Thank you,
 7 gentlemen.

61

CONT.

8 MR. MASON: Thank you. George Lindegren.
 9 MR. LINDEGREN: My name is George Lindegren. I live at
 10 245 D Street in Fillmore and I'm a homeowner. I've just got
 11 a few questions here that I want through. I know you are
 12 not answering questions, but I'll give you a report later.

62

13 How will the air quality of these emissions affect
 14 our health? It doesn't seem to be addressed.

15 What will you have -- excuse me. What about the
 16 groundwater seepage? Over and over again I read in the
 17 newspaper and other reports and journals that there's a
 18 significant amount of toxicity in these landfills and it
 19 then seeps in the groundwater, and from the persons we've
 20 talked to, you continue to state that this is going to be
 21 taken care of by this clay barrier.

63

22 I don't see how that's going to happen. The clay
 23 barrier is going to just fill up and that water and toxins
 24 are eventually going to spill out into the water table. I
 25 don't see how it's going to be treated unless there is some

1 kind of filter or filtration system that's designed to take
2 care of those toxins. Eventually I think we'll see those in
3 our water table.

63
CONT.

4 What about closing the Ballard Landfill? Didn't it
5 close because of homeowners' concerns, as well as just
6 running out of space?

64

7 Number four: Why don't you look at alternative
8 dump sites more seriously? Seems like you're bound and
9 determined to put this one in the Toland Landfill.

65

10 Number five: Do you feel that the -- do you feel
11 this area has less political and economic strength and
12 that's why you can push it over and down our throats? We
13 don't want to become the dumping ground for everybody
14 around, and you have also other land that I noticed, other
15 sections. There's no mention of it, but do you have other
16 plans for the future to expand this and accept land for a
17 dump, garbage from other counties as well.

66

18 Number six. How do you plan to compensate us for
19 the monetary effects we're going to have, loss of property
20 values and poor resale of homes and the pain and suffering
21 we're going to go through due to poor air quality and other
22 issues. You don't address that.

67

23 And as far as your mitigation procedures are
24 concerned, they don't seem to be very significant. Just in
25 globally looking at your report, you always say there's no

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1 problem with it, it's not significant, and it seems to
2 undervalue a lot of those issues that people bring up and
3 just kind of tell them -- just poo-poo them. It's really
4 not a very good report.

68
CONT.

5 We also find that your report doesn't seem to be
6 very objective, and it seems to be in favor of the
7 sanitation board and getting their point across so that they
8 can push this site on through.

69

9 What recourses do we have if we don't agree with
10 this board's approval of this project? There were a couple
11 items that basically I wanted to cover. Water runoff,
12 nuisance and odor and health risks. Again, you said in your
13 report, after your mitigation procedures, you seem to say
14 well, it's not significant, not significant, not
15 significant.

70

16 You know, when I read these reports throughout of
17 other people, other landfills, other issues in the paper,
18 that's not the comments that they keep coming up with. They
19 keep coming up with comments that they are getting nausea,
20 they are getting ill, there's toxic waste in the water. You
21 know, when I hear these things and compare your report to
22 those reports, it doesn't jibe, and I want to know, you
23 know, how you come across with this item.

71

24 Another thing, I'd rather do a trash segregating
25 once a week and reduce the amount of trash going into

72

1 landfills than have to deal with expanded landfills. If we
 2 all take a part and put in the time to do our recycling and
 3 to increase the efforts and maybe push that boundary, we
 4 eventually will reduce the need for landfills; if not now,
 5 we're going to have to do that anyway in the future. Thank
 6 you.

7 MR. MASON: Thank you. Linda Brewster.

8 MS. BREWSTER: Linda Brewster, mayor of the city of
 9 Fillmore. I live at 648 Mountain View, in what I hope will
 10 continue to be the beautiful Santa Clara Valley. I thank
 11 you for listening to us tonight and hope that you do take us
 12 very serious.

13 Page 1-12: Water use could -- I'm quoting here --
 14 incrementally contribute to cumulative reduction of the
 15 overflow from the Santa Paula Sespe basin to the Oxnard
 16 plain, which is in overdraft.

17 In order to mitigate this, you propose low-flow
 18 plumbing fixtures. Wash water will be collected and
 19 recycled. You will use all-weather roads, asphalt or some
 20 kind of rock. 30 acre feet of water is required per year.
 21 Another mitigation could be that VRSD, which is us, will pay
 22 the County Public Works Agency to purchase state water for
 23 release to Oxnard. This is our money and you are adding
 24 another level of bureaucracy. This is significant.

25 Page 116: The topographic alterations would result

74

1 in some increased visibility of the landfill from some
 2 locations in the immediate project area. I assume this
 3 means residents. To you it may not be significant, but to
 4 them I'm sure it is.

5 Further, noise impacts from traffic would exceed
 6 county standards. To mitigate this, the noise from the
 7 construction would only be from seven a.m. to seven p.m.,
 8 Monday through Friday, only 12 hours a day, five days a
 9 week. Noise barriers would be installed at a height of six
 10 feet. This brings back up the visual impact.

11 Page 117: Noise from the traffic on Highway 126 at
 12 Santa Clara School exceeds county standards at present. The
 13 project's increased traffic noise does contribute to the
 14 cumulative impact making it significant; therefore, no
 15 statement of overriding consideration should be given.

16 Page 117: Traffic movement, southbound turn lane
 17 operates at an LOS -- that's level of service -- E and F.
 18 Those are falling marks. County standards for state
 19 highways is D. Since the intersection does not meet signal
 20 warrants for Caltrans, the options are slow truck signs and
 21 a flashing yellow beacon. Since, without signalization,
 22 this impact would constitute a significant cumulative
 23 impact, no statement of overriding consideration should be
 24 given.

25 Page 118 and 19: Air quality. The air emissions

78

72 CONT.

74 CONT.

1 are only shifting from Bailard to Toland, so no increase
 2 over the baseline in the county. Terrific. Thus, it's not
 3 significant, but it certainly is not fair. Air quality,
 4 because of increased vehicle miles traveled, exceed the
 5 APCD's significance threshold of 25 pounds per day of
 6 nitrogen oxide. Therefore, this is a significant impact and
 7 no statement of overriding consideration should be given.

8 Hours of operation, page 215, state it will be
 9 Monday through Saturday, six a.m. to six p.m., yet the noise
 10 impacts stated on the previous page talk about the
 11 construction period of Monday through Friday, seven to
 12 seven. That's a difference of two hours in one day.

13 Increased vehicle traffic as per safety and
 14 accident possibilities are not adequately addressed.
 15 There's a nearby elementary school, a steep hill that lets
 16 out onto 126. These need to be addressed. 70 vehicles now
 17 travel to Toland. The increase would be 210, or, worse yet,
 18 450. This is significant.

19 Chapter three, page five -- three. Fire
 20 protection. It should be noted in your document that the
 21 Fillmore Fire Department is a volunteer fire department.
 22 That is not stated.

23 Chapter three, pages eight through 24. VRSD's
 24 landfill siting study of 1991, and I'll quote here: Some
 25 variation in ranking comparisons is unavoidable due to

78 CONT.

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1 individual judgments of the individuals ranking the sites.
 2 There should be some scientific evidence, hard
 3 facts, not judgments. The Toland site ranked fifth out of
 4 35 sites. The top three are in close proximity to Weidon.
 5 Makes you wonder. Thank you.

6 MR. MASON: John Wison, and I apologize if I
 7 mispronounced it.

8 MR. WISON: Name is John Wison. I live in Santa Paula
 9 and I'm just an average citizen. Santa Paula is not strong
 10 politically. We didn't print up T-shirts, no bumper
 11 stickers, no actors speaking out to the media. We are not
 12 activists, we are not organized, and for the average
 13 citizen, we're pretty much not informed.

14 For these reasons, people like me, we have to trust
 15 in your decision. You represent our government. You
 16 represent the federal government, you represent the state
 17 government, the county government and all the laws that
 18 govern landfills. I don't believe there is any law that
 19 regulates landfills concerning the political strengths or
 20 weaknesses of the surrounding communities.

21 The regulations over landfills concerns the
 22 preservation of the environment. There are many reasons,
 23 many in agriculture, that we should not put this in Toland
 24 Canyon. I chose three. The first one is water. I've been
 25 up to the Toland site. I know that there's wells right at

82 CONT.

83

1 the base of the canyon where it meets the creek there. I
 2 know that the total site of the acreage is probably around
 3 40 acres, and if we hit 15 inches a year and collect it over
 4 40 acres and it drains into the creek, that creek is only a
 5 mile and a half from the Santa Clara River, so that water
 6 will collect over 40 acres, 15 inches a year for every year,
 7 a hundred years from now, 150 years, and what are you going
 8 to do with that water when it goes down the river?

83

9 There are canyons above that collect water and
 10 drain down into Toland Canyon. They collect water. It's
 11 upstream from the Santa Paula aquifer. We're upstream from
 12 the Freeman Diversion Project. We're upstream from most of
 13 the county. Can you guarantee in a hundred years or 500
 14 years or one thousand years from now that the water will be
 15 clean? And what price will we pay if you're wrong?

16 The Weldon Canyon sites are not near a river. The
 17 Weldon sites are not near an aquifer. You cannot mitigate
 18 that. You cannot mitigate this site against the Weldon
 19 sites against water. You can't write a million dollar
 20 report and mitigate that.

21 The next point is trucks. The air quality will be
 22 worsened by 130 trucks a day. How much further do they have
 23 to go to Toland Road than to Weldon Canyon? Maybe 1,300
 24 truck miles a day? 130 trucks at 10 more miles a day, 1,300
 25 more truck miles per day than if you chose the Weldon Canyon

84

1 sites. You can't mitigate that. You can't mitigate that
 2 when you compare the two, the two areas.

84 CONT.

3 The third is the birds. You will be setting up a
 4 new bird migration pattern and that will be from the coast
 5 all the way inland to Toland Road, and probably even further
 6 into the Castaic landfill. You'll be setting that up, and
 7 right through -- right in the middle of that is the Santa

85

8 Paula Airport. What if a plane hits a bird over the city of
 9 Santa Paula and goes down, or even over east Ventura? The
 10 property damage, lives lost -- Weldon Canyon is not near an
 11 airport. Weldon Canyon won't significantly divert seagulls
 12 inland. You can't mitigate that. You can't have a million
 13 dollar report and mitigate any of that.

14 These are three points that you cannot mitigate in
 15 any way in any report, and you have to take that into
 16 account.

17 There are many reasons, common sense reasons,
 18 reasons that a million dollar report can't mitigate. You
 19 still have a choice, though. You still have a choice not to
 20 do this. You still have a choice to do the right thing, and
 21 it boils down to trust. It boils down to that trust. Trust
 22 in our government to make the common sense, correct
 23 decisions based on the environment, trust that our
 24 government officials -- you -- will make the right choice
 25 irregardless of political strengths or weaknesses.

1 Weldon Canyon was your first choice for many
 2 reasons. We trust that you won't settle for less now. For
 3 this 50-year landfill, you must think 500 years into the
 4 future. Forget the lawyers. Use your common sense. For
 5 your children, your children's children and their children
 6 and their children. Do the right thing because we trust you
 7 will.

8 MR. MASON: Anita Nelson.

9 MS. NELSON: My name is Anita Nelson. My maiden name is
 10 Strickland. I live and help farm the Strickland Ranch at
 11 735 North Hall Road. My family has grown avocados, lemons
 12 and grapefruits on this land since 1920.

13 I have sat through these meetings reserving comment
 14 because I honestly believed that reason would prevail, and I
 15 also knew that many of my family, neighbors and community
 16 members were far more qualified and articulate to speak
 17 than I.

18 Since spending the last few days in the library
 19 with your EIR and realizing that I am the most maximally
 20 exposed individual, an MIE, as described in section three,
 21 page three of the EIR, living in the area of this landfill,
 22 I thought it was time for you to hear from me.

23 I was hoping within this EIR would have the answers
 24 to many questions we all have about this project. I'm a
 25 taxpayer in this county. I have a right to a non-biased

1 appraisal of this project. I have a right to a county staff
 2 that pursues that end.

3 My first request is that the downside of this
 4 project be addressed. Every issue in this EIR as addressed
 5 now is side-stepped. None of the problems the community has
 6 expressed concerns about have been resolved in an absolute
 7 manner.

8 I am very concerned about the impact this landfill
 9 is going to have on our immediate communities and the county
 10 as a whole. However, I have become particularly concerned
 11 about those of us closest to this landfill who have gone
 12 unnoticed by map and otherwise throughout this EIR. At this
 13 time, I've been looking at this map through lots of
 14 meetings -- can you hear me if I go over there?

15 MR. CONWAY: We'll be able to hear you.

16 MS. NELSON: Actually, I'll just stand right here. Over
 17 on this map, there are residences noted, and there are four
 18 or five noted in and around the landfill. Ours is on there,
 19 several others to the east, or to the west, two or three to
 20 the other side. Most of my neighbors have been totally
 21 disregarded on any of these maps. We -- it is as if they
 22 are not there, and I am here to tell you that they are.

23 My neighbors, the Garcias, are more than -- less
 24 than 200 yards from me. They have children. Russell ---
 25 Russ Temple is perhaps closer to this landfill than we are.

1 He is retired. His neighbors to the south of him are in
 2 their 70s and 80s, the Vickers, the Arnolds. The
 3 Gabrielsons to the west of them are in their 70s and 80s
 4 also. On down the road by 20 feet are the Paul Romeros, his
 5 family, lots of children. There's a new residence behind
 6 him between Toland and Hall. The Onstots, his children.
 7 For the sake of my neighbors that are sitting here
 8 this evening, I'm not going to go through everybody. I just
 9 wanted to put some names to those of us who live out in this
 10 area. There are 28 residences east of Hall Road that you
 11 have not indicated in your maps. I counted -- I'm not --
 12 east of Toland, I'm sorry. I'm not completely knowledgeable
 13 of all the residents west of Toland, but I counted 17.

14 We are here. I ask that you guarantee our health,
 15 the health of our particularly vulnerable children and our
 16 elderly. I want all of you who have anything to do with
 17 this project to promise me that you believe in the safety of
 18 this project and would not hesitate to live where we all
 19 live with your families.

20 I know there are many, many alternatives being
 21 explored. Please put time and support toward these
 22 alternatives. Mr. Whitney, you are resigning to start a
 23 consulting firm related to recycling. Please apply your
 24 expertise to help us find a healthy alternative. Leave
 25 behind you a positive legacy. The VRSD and its board is

2.6-36

87

cont.

88

1 about to destroy a beautiful and vital part of Ventura
 2 County. Look at the counties and walk the hills and then
 3 please, please ask yourself if there isn't another answer.
 4 Thank you.

5 MR. MASON: Dora Crouch.

6 MS. CROUCH: I'm Dora Crouch. I live at 739 Yale
 7 Street, Apartment 6B, in Santa Paula. I'm a retired college
 8 professor, and when I had the world to choose from, I came
 9 and lived in Santa Paula, because it's one of the two most
 10 beautiful places on earth, and I don't see this project
 11 contributing to that beauty. I see it as an attack on that
 12 beauty, which unfortunately verifies a law that I noticed
 13 earlier, which says the more something is worth saving, the
 14 more likely it is to be destroyed.

15 MR. MASON: Jeff Koski.

16 MR. KOSKI: I'm a resident of Thousand Oaks. I'm also a
 17 member of the presiding Grand Jury of Ventura County, and
 18 there are other members of the Grand Jury that are here in
 19 attendance tonight.

20 My comments represent my own personal view, but the
 21 Grand Jury is vitally interested in solid waste management
 22 in this county and what's going to take place after Ballard
 23 is closed, and Toland is one issue. We're looking at the
 24 overall picture, but we consider it one of the most vital
 25 issues for the Grand Jury to address.

1 I'd like to refer to your EIR document, Section
 2 110, where you identify three elements that will not be
 3 mitigated to any level of significance, and I won't dwell on
 4 them too long because they've been covered by other speakers
 5 already.

6 One is the total impact of traffic at the
 7 intersection of Toland and 126. If this project is adopted,
 8 I think it would be unconscionable not to put a traffic
 9 light with extensive turn lanes both on Toland and on 126 to
 10 accommodate this increased truck traffic.

11 Noise impact to the Santa Clara School. The
 12 Ventura Regional Sanitation District is a self-sustaining
 13 pay-as-you-go organization, and I know that you people have
 14 the wherewithal to spend money for other than just
 15 sanitation reasons. And my question -- I think the Santa
 16 Clara School is a landmark that should not be jeopardized,
 17 and I wondered if you have considered in the mitigation
 18 picking it up and moving it to a more appropriate site,
 19 still within the range of the students that attend that
 20 school. If not, I think you should consider it.

21 Air quality impact from the emissions in that area.
 22 A number of speakers have addressed the impact to citrus and
 23 avocados, and I question whether the report has sufficiently
 24 analyzed, along 126, coming from the Santa Paula direction,
 25 the impact of these emissions, as well as the impact of

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1 going up Toland Road where the orchards are so adjacent to
 2 the highway, and, as you know, trucks going up and down
 3 steep grades, they don't just let out a little emission.
 4 They really belch it out. So I'd like you to reconsider the
 5 impacts of those, especially when they are not going to be
 6 mitigated.

7 On page 318 -- 3.8-18, there is a map of the site
 8 that depicts land suitable for landfill and land not
 9 suitable. However, it's a black and white map and the
 10 Toland site is not identified on there, so it's quite
 11 meaningless, the way it is now. By the way, I'm personally
 12 reviewing this document, so these are my observations.

13 On page 3.8-25, there are two residences less than
 14 one-half mile from the site. However, myself and five other
 15 members of the Grand Jury have visited Toland, and those
 16 residents are much closer to Toland Road than they are to
 17 the site, and my question is have those people been
 18 contacted personally? How deep are their roots? Do they
 19 want to move? Can they stand it?

20 55 db's of noise. If you like classical music and
 21 somebody is playing rock and roll at the 55 db's, you can't
 22 stand it more than a couple of minutes, or vice-versa, so I
 23 would suggest that all those people, especially the lady
 24 that preceded me, all of the residents that are in proximity
 25 be addressed personally by your committee.

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1 Were there noise tests conducted from Toland Road
 2 or were they just measured at the site itself with existing
 3 equipment? And at the rate of 450 vehicle trips per day,
 4 what are the expected noise levels up Toland Road and down
 5 Toland Road and the impact especially to those two
 6 residences? Is it even feasible that they would want to
 7 stay there other than their desire to continue their life as
 8 is?
 9 I think that concludes my discussion for now.
 10 Thank you.

11 MR. MASON: Thank you. Fred Strickland.

12 MR. STRICKLAND: Good evening. Thank you for your time.
 13 My name is Fred Strickland. I reside at 519 North 10th
 14 Street here in Santa Paula. I farm and am a potential
 15 resident of 735 North Hall Road, and a potentially maximally
 16 exposed individual also. I'm a third generation farmer of
 17 the property, with a nine-month-old son.

18 I have been a licensed pest control advisor for ten
 19 years. I taught integrated pest management at Cal Poly in
 20 San Luis Obispo for three years, and I have served as a
 21 consultant in integrated pest management for over 15 years.
 22 I now work for a large farming company in the county,
 23 farming over 2,600 acres.

24 What I'd like to specifically address is the
 25 unilateral dismissal of an impact on agriculture, and, in

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1 particular, pest management. Ventura County has the oldest
 2 and most effective P.M. program in the world. It is used as
 3 a model and an example in agricultural education worldwide.
 4 With regard specifically to integrated pest
 5 management, dust has a zero tolerance level. Any additional
 6 dust is unacceptable. Local growers spend thousands of
 7 dollars on water trucks and continuous application of water
 8 to dirt roads during harvest on their ranches alone, much
 9 less on an operation the size of the Toland Dump, and
 10 specifically Toland Road itself as an entrance and exit from
 11 the dump.

12 You did mention briefly the Cal Poly Pomona report.
 13 I personally know most of the staff of the ag and entymology
 14 department at Cal Poly, and I would be eager to see the
 15 names of those that prepared the report and the specific
 16 issues that it addressed.

17 The principal pest as of late affecting avocados in
 18 the county is a new pest called parsea mite, and for the
 19 court report, that's p-e-r-s-e-a. Ben Faver of the --
 20 Dr. Ben Faver of the University of California cooperative
 21 extension has recommended biological control implementation
 22 only for control of this pest. The pest is airborne, and
 23 it's also passed along on vehicles. The pest spins a very
 24 heavy web, which, once covered by dust, prevents the
 25 introduction of beneficial insects. Any additional dust is

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1 unacceptable for control of this insect, which is possibly
 2 the single most devastating insect pest of avocados in the
 3 state of California.

4 I would like to reinforce and completely agree with
 5 Gordon Kimball's comment that the Piru ABC dust level
 6 figures are totally unacceptable in this application here.

7 In closing, on a personal sort of note, not very
 8 official, Ojai does have very wealthy and famous people
 9 speaking out directly against Weldon Canyon, but I think, as
 10 you will see, you'll find the residents and farmers of Santa
 11 Paula and the Santa Clara Valley a very tenacious bunch.
 12 Thank you very much.

13 MR. MASON: I'm not even going to try this last name.
 14 First name is Texas?

15 MR. KICENIUK: Thank you. My name is Taras Kiceniuk,
 16 and I've lived in Santa Paula for about 15 years or so. I
 17 apologize for not being better prepared because, in fact, I
 18 had come here to be educated, and I was so sorely
 19 disappointed. Instead of being educated, I feel I was
 20 subjected to an attempt at brainwashing, because even though
 21 I was not familiar with the substance of this summary
 22 report, it's so clearly a whitewash and advocacy document
 23 for this decision that it boggles the mind that people could
 24 purport to have put it forth in good faith, and I rather
 25 feel like someone who went to hear about the bad effects of

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1 smoking, and then listened to a presentation by the tobacco
 2 lobby.

3 MR. MASON: Trygve Forland.

4 MR. FORLAND: I'm Trygve Forland, 1332 Woodland. I'd
 5 like to speak to you briefly from the point of view of a
 6 retired orthopedic surgeon who practiced here for almost 16
 7 years, and the numerous auto accident patients I
 8 treated that came from this highway, and there were a very
 9 large number of accidents, much more than any other part of
 10 the county, and with the increase to four lanes, it
 11 undoubtedly has cut it down, but with the huge number of
 12 trucks that you're going to have, 200 to 450 trucks, you
 13 will basically be eliminating one lane there, and you're
 14 going to get back to exactly what you had before; and then
 15 with the difficulty of making a left turn off that road into
 16 this area, that too will create additional problems for you.

17 And there are many drivers on this road who
 18 inexplicably will go into the other side, and I treated many
 19 where they would be hit by an opposing car, and I myself
 20 once almost got hit driving on that road, but I gunned the
 21 car and just barely got out of the way of the one coming
 22 toward me. And I think you have to keep those
 23 considerations in mind.

24 I have some other thoughts here, but -- and then --
 25 well, I think I can end it at that. That's essentially what

1 I wanted to say. Thank you.

2 MR. MASON: Thank you. John Melton.

3 MR. MELTON: Good evening. I know it's been a long
4 evening for you here, and I'll try and take a little
5 different perspective here, but I just want to make some
6 comments that I find this EIR similar to the Regional
7 Sanitation District's report called the Toland Road Landfill
8 Expansion Code and Policy II Discussion, and in that, I
9 think I find the document well written.

10 It's a well written and cleverly presented
11 marketing document for the Toland Expansion project. It
12 combines a number of generalizations and selective data to
13 support two basic conclusions: One, there is a disposal
14 crisis in Ventura County, in Southern California, and the
15 state. Two: Toland is the best solution to this crisis.

16 Well, not to go into it fully, but to kind of stay
17 in there, one of the items in there says that the
18 surrounding counties cannot take our waste. The Los Angeles
19 basin needs more landfill capacity to accommodate its future
20 disposal needs, and that's precisely why so many landfill
21 developers are spending millions to develop mega landfills
22 in the areas of Southern California remote from the urban
23 centers.
24 These are huge volume, one-hundred-year sites, and
25 they are getting permitted, and contrary to the statements

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1 in the report, Los Angeles County itself has no import
2 restrictions. Orange County has just lifted its
3 restrictions. Both Riverside and San Bernardino are
4 anticipating major revenues from imports to the Eagle
5 Mountain and Bogel Station landfills.
6 In addition, other permitted capacity for
7 California exists in Utah, Nevada, Arizona and in
8 Washington. I was talking about other sites. Southern
9 California Association of Governments has had in a recent
10 report stated that -- had an update on some of the
11 landfills. The Mesquite Landfill, it said the project was
12 just approved by the Board of Supervisors and could be ready
13 to begin construction within six months. The Bogel Station,
14 this project is going to the Board of Supervisors on October
15 the 5th.

16 Eagle Mountain, the revised EIR is scheduled to be
17 out by the end of the year. Eismere, BFI is trying to
18 strike a deal with BKK to take over the project. The city
19 of Los Angeles, they'll have an RFP, or request for
20 proposal, that's out that's very similar in content.
21 Chiquita Canyon. Now, Chiquita Canyon is right
22 down the road here on Highway 126. It has been used by a
23 number of cities in Ventura County already, and is being
24 used. The standing committee on implementation in the
25 Southern California Association of Governments, the

1 responsibility is to look at all projects in the region, in
 2 Southern California, to make sure that they'll conform to
 3 the regional comprehensive plan. This standing committee on
 4 implementation for the last four months has been studying
 5 Chiquita Landfill.

6 Chiquita Landfill is a Class 3 municipal solid
 7 waste facility. It consists of five canyons totaling 154
 8 acres. Right now there's probably another three years' life
 9 in that particular existing conditional use permit. They
 10 are in the process right now of trying to get an expansion
 11 there, and the proposed project would probably extend that
 12 capacity of the existing landfill by a minimum of eight
 13 years.

14 The standing committee on implementation, after
 15 reviewing this for four months, have made the following
 16 recommendations to the regional counsel of the Southern
 17 California Association of Governments: The first
 18 recommendation was that the proposed Chiquita Canyon
 19 landfill expansion would be generally consistent with the
 20 policies in the regional comprehensive plan and guide. Two,
 21 this project would provide cities and counties in the region
 22 with much-needed long-term landfill disposal options.

23 I think, in looking at this, we just have to come
 24 to one conclusion: That, in short, there is no basis for
 25 the conclusion that a disposal crisis is at hand, and Toland

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1 is really not needed. Thank you.

2 MR. MASON: Thank you. That's all the speaker cards we
 3 have. Is there anybody else who is wishing to speak who
 4 either would like to turn in a card at this point, or if you
 5 haven't turned in a card, you can come forward, state your
 6 name and then fill out a card?

7 I see no one. Again, if you did not speak tonight
 8 but would like to be notified of future meetings and
 9 documents' availability, there is a mailing list at the back
 10 that you can sign. If you already are on the mailing list,
 11 if you've been receiving information about the project, you
 12 don't need to re-sign on that, because you are already
 13 there. Yes?

14 UNIDENTIFIED SPEAKER: Who do we send our comments to?
 15 What's the address?

16 MR. MASON: Ventura Regional Sanitation District. At
 17 the back of your packet, there is an address on that form.
 18 Thank you very much.
 19 (The proceedings concluded at 9:23 p.m.)

1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

2 --000000--

3 I, ANN L. WRIGHT, CSR NO. 5725, a Certified Shorthand

4 Reporter in and for the State of California, certify that

5 the foregoing proceedings were taken at the time and place

6 as herein set forth; that said proceedings were taken down

7 in shorthand by me and thereafter transcribed into

8 typewriting, and I hereby certify the foregoing 82 pages

9 contain a full, true, and correct computer-assisted

10 transcription of my shorthand notes so taken.

11 I further certify that I am not interested in the event

12 of the action.

13 IN WITNESS WHEREOF, I have hereunto subscribed my name

14 this 8th day of November, 1995.

20 
ANN L. WRIGHT
21 Certified Shorthand Reporter No. 5725

**DOCUMENT 61
PUBLIC MEETING TRANSCRIPT
SANTA PAULA COMMUNITY CENTER
OCTOBER 19, 1995
RESPONSE TO COMMENTS**

Response 61-1

1. The comment is correct in noting that the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

2. CEQA provides authority to approve a project which may result in significant unavoidable environmental effects. As stated in Section 15043 of the CEQA Guidelines, a public agency may approve a project even though the project may cause a significant effect on the environment. The agency may make such a decision, however, only after going through the full CEQA process and making explicit findings to support its actions. A statement of overriding considerations would be required with regard to the above impacts.

Response 61-2

1. As discussed in Section 3.1.4 of the Draft EIR, based on the County General Plan and the designation of the area between Santa Paula and Fillmore as greenbelt, it is reasonable to assume that these areas would remain primarily open space and agricultural. The analysis was based on Caltrans' projection of a 79 percent increase by 2015. This conservative projection of an increase of approximately 16,600 ADTs, more than adequately addresses the potential impact of the 190 additional trucks for the S.P. Milling Company's Sycamore Ranch Project identified as a concern in this comment.

Response 61-3

1. The alternatives analysis in Chapter 4.0 of the Draft EIR is comprehensive, objective, and meaningful. In addition to the No Project alternative, the Draft EIR evaluated the following 32 alternatives:

<u>Alternative</u>	<u>Number Evaluated</u>
In-County landfills (waste transport by truck)	1
Out-of-County (waste transport by truck)	4
Rail-haul alternatives	4
Offsite alternative location (within County)	20 ⁽¹⁾
Resource Recovery	1
Reduced Project	1
No Project	1
TOTAL	32

(1) Comparative impact analysis of top 20 sites identified in previous siting studies (VRSD Siting Study, CoSWMP, and Weldon Canyon EIR).

2. As shown in the above table, the alternatives analysis included the evaluation of 20 offsite alternatives, including the alternatives previously considered in the VRSD Study referenced in this comment. Potential environmental impacts associated with each of the alternative sites is summarized in Table 4.7 of the Draft EIR. As concluded in Section 4.5.4 of the Draft EIR, none of the alternative in-County sites provide the opportunity to eliminate significant impacts or reduce overall environmental impacts compared to the proposed project.
3. Compared to the proposed project, development of a new landfill at a currently undisturbed location would allow the installation of a composite liner to minimize the potential for water quality impacts. Development would, however, introduce the potential for water quality degradation for both surface water and ground water resources to a new site. Since the proposed project would not have a significant impact on ground water quality, development of a landfill at an offsite location is unlikely to reduce potential environmental impacts to this resource compared to the proposed project.
4. The potential for surrounding landfills to accommodate waste proposed to be disposed at Toland under the proposed project is discussed in the respective sections within Chapter 4.0 of the Draft EIR. The need for landfill capacity in both the short-term and long-term is documented in the EIR. This finding is confirmed by a recent CIWMB report which lists Ventura County as one of twenty-one counties statewide which has less than 15 years remaining disposal capacity (CIWMB, 1995). In addition, as discussed in Section 1.2.2.2, of

the Draft EIR, even with the diversion program implemented under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County has only nine years of remaining landfill capacity (County, 1995a).

Response 61-4

1. As discussed in Section 3.11.3.3 of the Draft EIR, Caltrans' guidelines for designing truck escape ramps were used to evaluate the potential impact for "runaway trucks" on Toland Road. According to Caltrans' guidelines, the accident rate attributed to runaway trucks is the key factor in determining the need for a truck escape ramp for a specific section of road. A primary reason trucks "lose their brakes" is overheating of the brakes over long, steep grades.
2. Prior to considering an escape ramp, Caltrans recommends warning signs regarding a steep grade and for trucks to use a low gear. Warning signs provide the driver information so that they may use engine braking and proper gear selection to minimize the potential for brake overheating.
3. Section 3.11.3.3 of the Draft EIR also put the downgrade on Toland Road into perspective with existing truck escape ramps in California. As shown on Table 3.11.9 of the Draft EIR, there are currently only 14 escape ramps in California. These ramps are located on major state or interstate highways, with high traffic volumes and a large percentage of trucks. As shown in the table, none of the existing escape ramps are located in Ventura County. Based on the above, and as concluded in the Draft EIR, it is clear that a truck escape ramp is not warranted on Toland Road.

Response 61-5

1. As discussed in Section 3.3.3.1.2 of the Draft EIR, approximately 30-acre feet per year of nonpotable water would be provided to the proposed project from one or a combination of the three following sources:
 - A new offsite well located south of Toland Park.
 - A proposed new onsite well on VRSD's 53-acre parcel.
 - An agreement with the Rio Plaza Water Company for VRSD to purchase water for transport to Toland by truck.
2. VRSD has a signed agreement with the Rio Plaza Water Company. A copy of this agreement is included in Appendix E of this Final EIR.

3. The offsite well located south of Toland Park has been completed and it draws water from the Saugus Formation. As discussed in Section 3.3.2.1.1 of the Draft EIR, the Saugus Formation consists of crudely bedded alluvial conglomerate that is the primary aquifer for ground water of the Santa Paula-Sespe Basin. The well has a capacity of 500 gpm. The proposed project would require 30-acre feet of water per year to meet its requirements for nonpotable water. The owner has agreed to provide VRSD the water required for the proposed project.
4. The proposed new well on VRSD's 53-acre parcel is also situated in the Saugus Formation. No specific feasibility study has been completed for this well and it is considered speculative.
5. Of the three sources for nonpotable water, the agreement with the Rio Plaza Water Company was the only demonstrated source at the time the Draft EIR was prepared. It is for this reason that the traffic, noise and air quality analysis in the Draft EIR included the impacts associated with delivery of water from El Rio by truck. A revised mitigation measure is included in Table 1.1 of this Final EIR that requires VRSD to offset the water withdrawn by these wells by reducing the water usage at its Bailard and Coastal landfills to mitigate the project's contribution to overdraft of the Oxnard Plain.

Response 61-6

1. The Draft EIR considered the comments on the Initial Study. As stated in Section 15063 of the CEQA Guidelines, the purposes of an Initial Study include assisting in the preparation of an EIR by: (1) focusing the EIR on the effects determined to be significant; (2) identifying effects considered not to be significant; and (3) providing an explanation for determining that potentially significant effects would not be significant. In addition, if as in the case of the proposed project, the lead agency determines an EIR will clearly be required, CEQA states that an Initial Study is not required, but may still be desirable (Section 15063 of the CEQA Guidelines).
2. Comments received on the Notice of Preparation as a result of the scoping process were considered during preparation of the Draft EIR. Regarding this comment's concern regarding the liner system for the proposed project, the project consists of both a vertical and lateral expansion of Toland. The vertical expansion component of the proposed project includes the placement of additional waste on top of waste already landfilled at the site. Vertical expansions of existing landfills are allowed by state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) without a requirement to excavate previously landfilled waste to allow the

installation of a composite liner system. Lateral expansions of existing landfills are required by state and federal regulations to include a composite liner system. Therefore, based on state and federal landfill regulations, the proposed project includes a composite liner for the lateral expansion component of the project.

3. As discussed in Section 2.5.1 of the Draft EIR, for the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot thick low permeability intermediate soil barrier would be installed. Incorporated with the intermediate soil barrier is a landfill gas collection system, and a leachate collection and removal system. The design of the intermediate soil barrier system shall take into account the overburden weight of the new waste and shall account for any settlement that may occur.
4. The intermediate soil barrier to isolate the existing waste from the new waste is not required by state or federal landfill regulations for vertical expansions, however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.
5. In addition, as discussed in Section 3.3 of the Draft EIR, based on the geologic and hydrogeologic conditions at Toland, and the landfill regulatory requirements included in CCR Titles 14 and 23, and Subtitle D (e.g., composite liner system, landfill gas collection system, leachate collection and removal system, etc.) the proposed project would not impact ground water quality.

Response 61-7

1. The alternatives analysis in Chapter 4.0 of the Draft EIR is comprehensive, objective, and meaningful. The Draft EIR evaluated the following 32 alternatives:

<u>Alternative</u>	<u>Number Evaluated</u>
In-County landfills (waste transport by truck)	1
Out-of-County (waste transport by truck)	4
Rail-haul alternatives	4
Offsite alternative location (within County)	20 ⁽¹⁾
Resource Recovery	1
Reduced Recovery	1
No Project	<u>1</u>
TOTAL	32

(1) Comparative impact analysis of top 20 sites identified in previous siting studies (VRSD Siting Study, CoSWMP, and Weldon Canyon EIR).

2. As shown in the above table, the alternatives analysis included the evaluation of 20 offsite alternatives. Potential environmental impacts associated with each of the alternative sites is summarized in Table 4.7 of the Draft EIR. As concluded in Section 4.5.4 of the Draft EIR, none of the alternative in-County sites provide the opportunity to eliminate significant impacts or reduce overall environmental impacts compared to the proposed project.
3. Compared to the proposed project, development of a new landfill at a currently undisturbed location would allow the installation of a composite liner to minimize the potential for water quality impacts. Development would, however, introduce the potential for water quality degradation for both surface water and ground water resources to a new site. Since the proposed project would not have a significant impact on ground water quality, development of a landfill at an offsite location is unlikely to reduce potential environmental impacts to this resource compared to the proposed project.
4. The potential for surrounding landfills to accommodate waste proposed to be disposed at Toland under the proposed project is discussed in the respective sections within Chapter 4.0 of the Draft EIR. The need for landfill capacity in both the short-term and long-term is documented in the EIR. This finding is confirmed by a recent CIWMB report which lists Ventura County as one of twenty-one counties statewide which has less than 15 years remaining disposal capacity (CIWMB, 1995). In addition, as discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion program implemented under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County has only nine years of remaining landfill capacity (County, 1995a).

Response 61-8

1. As discussed in Section 3.11.2.4, the LOS of "E" and "F" for the southbound left-turn movement from Toland Road to Highway 126 occurs whenever a single vehicle is waiting to make a left-turn onto Highway 126. This LOS for the left-turn movement is due to nonproject-related traffic on Highway 126 which does not provide adequate gaps in traffic for left-turns and would occur with or without the propose project. This situation is not limited to Toland Road and is not a result of the proposed project. A similar situation is expected to occur at other roads intersection with Highway 126 between Santa Paul and Fillmore (e.g., Hall Road, Sycamore

Road) that are not affected by the proposed project. As shown in Table 3.11.10 of the Draft EIR, while the existing LOS for the southbound left turn movement (i.e., from Toland Road onto Highway 126) at this intersection is "F", the remaining movements at this intersection are currently at acceptable service levels and would continue to operate at acceptable levels with or without the proposed project.

2. As part of its review of the Draft EIR and the supporting traffic study for the proposed project, Caltrans independently performed the signal warrant analysis and concurred that signal warrants are not met for the Toland Road/Highway 126 intersection (see Comment Letter 02). Based on its review, Caltrans recommended the installation of an intersection control flashing beacon, intersection lighting, and warning signs. These improvements are included in the EIR as mitigation measures and would mitigate potential traffic-related safety issues at the intersection. The inclusion of these measures does not, however, alter the findings or conclusions of the Draft EIR regarding the LOS. As discussed in Section 3.11.6 of the Draft EIR, without signalization, the southbound, left-turn movement from Toland Road to Highway 126 would continue to operate at an unacceptable LOS. Without signalization at the Toland Road/Highway 126 intersection, cumulative impacts would constitute a significant unavoidable adverse impact, and a statement of overriding considerations would be required.
3. Notwithstanding Caltrans' determination that a signal is not required at the intersection of Toland Road and Highway 126, in the event at some time in the future Caltrans decides a signal is required, VRSD has agreed to pay the cost for the signal. While this is not a mitigation measure in terms of CEQA, VRSD would accept a condition to this effect in the CUP for the proposed project.

Response 61-9

1. As discussed in Section 3.12.3.2 of the Draft EIR, the County's 1994 Air Quality Management Plan (AQMP) includes a baseline air emissions inventory categories for "Solid Waste Landfill" and "Landfill Gas Combustion." The AQMP also includes baseline air emissions inventory categories for various mobile sources including the transport of materials, which would include the transport of solid waste to landfills. Therefore, air emissions associated with landfill operations in the County are not classified as surplus or optional, but rather are considered to be part of the County's baseline emissions inventory and are taken into account in the AQMP in terms of the strategy for meeting state and federal clean air standards.

2. As discussed in the Draft EIR, air emissions associated with the proposed project would be accompanied by corresponding emissions reductions at Bailard as landfilling operations shift to Toland. Shifting landfilling operations from Bailard to Toland reflects a realignment of waste disposal within the County, and does not represent an increase over the baseline emissions inventory for the County. Therefore, on a County-wide basis, air emissions associated with the proposed landfill operations and onsite equipment at Toland would not represent a significant emissions impact.
3. Notwithstanding that the proposed project represents a shift of air emissions associated with solid waste disposal activities on a County-wide basis, as discussed in Section 3.12.3.2.1 of the Draft EIR, the proposed landfill operations and onsite equipment at Toland were analyzed to determine if the proposed project would result in the exceedance of state or federal ambient air quality standards at or beyond the project boundary. This analysis is based on the wind patterns and other meteorological conditions at the proposed site and within the Santa Clara Valley. As documented in the Draft EIR, the proposed project would not result in state or federal ambient air quality standards being exceeded at or beyond the project boundary. Therefore, based on the significance thresholds developed by APCD, the air quality impacts associated with the onsite operations under the proposed project would be below a level of significance both on a County-wide and local basis.
4. This comment is correct in noting that offsite mobile air emissions resulting from the additional vehicle miles traveled to Toland versus Bailard to transport 1,500 tons of waste per day, would result in a significant air quality impact on a County-wide basis. As discussed in the Draft EIR, however, the offsite mobile air emissions associated with the proposed project at Toland would be less than transporting 1,500 tons of waste per day to the Simi Valley or Chiquita Canyon landfills.

Response 61-10

1. Section 3.15.3.1.4 of the Draft EIR addressed the potential impacts of Valley Fever as it relates to the proposed project. As discussed in this section of the Draft EIR, no significant impacts are expected from the proposed project with regard to Valley Fever based on the following:
 - Numerous ground disturbing activities occur continually throughout the County as part of a variety of activities including, but not limited to, major and minor construction projects, surface mining and quarrying operations, and as part of agricultural operations. Such ground disturbing activities are considered baseline, and represent a continual source of spores that

contribute to the low number of Valley Fever cases reported each year. The proposed project would fall within these operations that occur continually in the County.

- An analysis of a Valley Fever outbreak associated with the January 1994 Northridge earthquake by the U.S. Department of Health Services, Center for Disease Control (World News Digest, June 1994), reinforces that it requires a major event (i.e., such as another major earthquake) to release a large number of spores over a wide area for a significant outbreak of Valley Fever to occur.

Since ground disturbing activities, such as the proposed project, are continuous throughout the County and the number of cases of Valley Fever reported in the County each year are low, the proposed project would not represent a risk to public health from an outbreak of Valley Fever.

Response 61-11

1. As discussed in Section 3.10.3 of the Draft EIR, the County General Plan includes specific noise standards that are applicable to the proposed project. As discussed in the Draft EIR, impacts to noise sensitive receptors due to the proposed project would be considered significant if noise levels exceed the following County General Plan standard:
 - 1-hour Leq of 55 dBA, or ambient noise level plus 3 dBA (whichever is greater) during any hour between 6:00 a.m. and 7:00 p.m.
2. The use of noise barriers (i.e., noise walls) is a common and acceptable method of mitigating noise from traffic. Caltrans uses noise barriers to effectively mitigate noise levels along busy freeways throughout the state.
3. As discussed in Section 3.10.6 of the Draft EIR, the existing and future nonproject traffic-related cumulative noise conditions along Highway 126 in the project vicinity constitute a significant impact. The Draft EIR also discussed, however, that the project-related traffic volume would result in only an incremental increase to noise level at the Santa Clara School when compared to the existing and future nonproject traffic-related cumulative noise levels. Based on this finding, Section 3.10.8 of the Draft EIR specifies that a statement of overriding considerations for the cumulative nonproject traffic-related noise impact will be required.
4. As discussed in Section 3.10.4 of the Draft EIR, the proposed project's contribution to the traffic-related cumulative noise impact would be a maximum increase of 0.6 dBA under the "worse case" traffic scenario for 2015. In addition, the noise impact due to nonproject-related cumulative traffic on Highway 126 extends beyond the vicinity of Toland Road. Noise

conditions along Highway 126 represent a regional issue and are not the responsibility of VRSD. Mitigation measures for the nonproject-related cumulative noise impacts were, therefore, not proposed as part of the proposed project.

5. The County is responsible for determining appropriate project conditions and to consider surrounding land use compatibility when making required County Zoning Ordinance findings. It is important to note, however, that County Zoning Ordinance findings are based on project specific impacts only and are not based on cumulative impacts.
6. As long as the project specific noise impacts do not result in an increase in excess of 3 dBA, the project is considered to meet the County General Plan standards and a consistency finding, as required by the County Zoning Ordinance, can be made. As discussed above, the proposed project's contribution to the traffic-related cumulative noise level at the Santa Clara School would be a maximum of 0.6 dBA under the "worse case" traffic scenario for 2015. Therefore, the proposed project would not exceed the applicable County General Plan noise standard and a consistency finding can be made under the County Zoning Ordinance.
7. It is beyond the scope of this EIR to speculate what decision the County Board of Supervisors would make regarding the proposed project, including the cumulative noise impact at Santa Clara School. In accordance with Section 15093 of the CEQA Guidelines, "If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable'."
8. Mitigation of the cumulative noise impacts from the nonproject-related traffic volumes on Highway 126 could include the construction of a sound wall along portions of the highway, and/or window and/or building retrofitting of Santa Clara School. As with traffic impacts, measures to mitigate conditions within the right-of-way of Highway 126 would require review and approval by Caltrans. Proportionate (i.e., "fair share") funding of these improvements could be considered by the County for individual projects which contribute to traffic on Highway 126.

Response 61-12

1. Toland does not currently attract birds and is not used as a loafing area by gulls. It is speculative as to whether gulls or other bird species would be attracted to Toland due to the proposed project. Similarly, it is speculative as to whether gulls would come in conflict with

the Santa Paula Airport. Issues that are speculative cannot be evaluated, therefore, the possibility that Toland may attract gulls or other bird species and the potential that gulls could come in conflict with the Santa Paula Airport is not addressed in the EIR. Toland would be operated in compliance with CCR Title 14, including the following operational procedures (see Section 3.14.5 of the Draft EIR) that are known to be effective in minimizing birds at landfills:

- Compaction of waste at the active working face.
 - Periodic 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.
 - The working face would be kept as small as safely practicable, given the type of and number of landfill equipment working there.
 - An active litter control program.
2. As discussed in Section 3.14.3.1.1 of the Draft EIR, in the event birds are determined to be a nuisance at Toland additional measures would be implemented and may include, but not be limited to, the use of an overhead nylon line grid system (bird wires), distress tapes, propane cannons, and/or habitat manipulation/modification. The effectiveness of these measures would be monitored and, if found not to be effective, additional measures would be developed. To formalize this requirement, a mitigation measure has been included in this Final EIR regarding the use of additional measures in the event birds are determined to be a nuisance at Toland. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.
3. As part of the permitting process, VRSD will coordinate with the FAA regarding the Santa Paula Airport.

Response 61-13

1. The proposed project consists of both a vertical and lateral expansion of Toland. The vertical expansion component of the proposed project includes the placement of additional waste on top of waste already landfilled at the site. Vertical expansions of existing landfills are allowed by state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) without a requirement to excavate previously landfilled waste to allow the installation of a composite liner system. Lateral expansions of existing landfills are required by state and federal

regulations to include a composite liner system. Therefore, based on state and federal landfill regulations, the proposed project includes a composite liner for the lateral expansion component of the project.

2. As discussed in Section 2.5.1 of the Draft EIR, for the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot thick low permeability intermediate soil barrier would be installed. Incorporated with the intermediate soil barrier is a landfill gas collection system, and leachate collection and removal system. The design of the intermediate soil barrier system shall take into account the overburden weight of the new waste and shall account for any settlement that may occur.
3. The intermediate soil barrier to isolate the existing waste from the new waste is not required by state or federal landfill regulations for vertical expansions, however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.
4. In addition, as discussed in Section 3.3 of the Draft EIR, based on the geologic and hydrogeologic conditions at Toland, and the landfill regulatory requirements included in CCR Titles 14 and 23, and Subtitle D (e.g., composite liner system, landfill gas collection system, leachate collection and removal system, etc.) the proposed project would not impact ground water quality.

Response 61-14

1. Comments received on the Initial Study were addressed in the Draft EIR. As stated in Section 15063 of the CEQA Guidelines, the purposes of an Initial Study include assisting in the preparation of an EIR by: (1) focusing the EIR on the effects determined to be significant; (2) identifying effects considered not to be significant; and (3) providing an explanation for determining that potentially significant effects would not be significant. In addition, if as in the case of the proposed project, the lead agency determines an EIR will clearly be required, CEQA states that an Initial Study is not required, but may still be desirable (Section 15063 of the CEQA Guidelines).

2. Comments received on the Notice of Preparation as a result of the scoping process were considered during preparation of the Draft EIR. Issues raised by the City of Fillmore during the scoping process (letter dated March 30, 1995) and where they are addressed in the Draft EIR are as follows:

- *Expansion of Toland is unnecessary* - The purpose and need for the proposed project was included in Section 1.2.2 of the Draft EIR.
- *VRSD is not the appropriate lead agency* - This was not specifically discussed in the Draft EIR. CEQA Guidelines lists criteria for identifying the lead agency when two or more public agencies will be involved with a project:
 - "If the project will be carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency." (Section 15051 (a))
 - "Where more than one public agency equally meet the criteria in subsection (b), the agency which will act first on the project in question shall be the Lead Agency." (Section 15051 (c))

Based on the criteria listed in the CEQA Guidelines, VRSD is the appropriate lead agency for the proposed project. VRSD acting as the lead agency for the proposed project is analogous to a city or county acting as the lead agency for a public works project they are implementing. Other agencies (referred to in the CEQA Guidelines as responsible agencies) will use the EIR in the process for issuance of the various permits required for the proposed project. The pertinent requirements of these agencies have been considered in the environmental analyses.

- *The project description is inadequate* - CEQA Guidelines state that an Initial Study is used to assist in the preparation of an EIR. The Initial Study/NOP for the proposed project included in brief form a description of the project including the location of the project as per Section 15063 (d)(1) of the CEQA Guidelines. A detailed project description was included as Chapter 2.0 of the Draft EIR.
- *The surrounding land uses and setting information required by CEQA is insufficient to assess potential impacts on the environment* - As stated above, an Initial Study is a brief document used to assist in the preparation on an EIR. Detailed baseline information was included for each resource topic in Chapter 3.0 of the Draft EIR. Regarding land use, Section 3.8 of the Draft EIR provided a detailed discussion of the surrounding land uses.
- *The NOP places too much reliance on current operations at Toland to justify curtailed environmental review* - A full discussion of impacts was included for each resource section in Chapter 3.0 of the Draft EIR.
- *Expansion of Toland is inconsistent with VRSD's current siting criteria and policy* - Sections 3.8.3.1.5 and 4.5.3 of the Draft EIR included a detailed discussion of the siting criteria.
- *VRSD must consider all feasible alternatives including the No Project alternative* - Alternatives were discussed in detail in Chapter 4.0 of the Draft EIR, including the No Project alternative that was discussed in Section 4.8 of the Draft EIR.

- *Closure of the existing landfill should be discussed* - Section 4.8 of the Draft EIR discusses the No Project alternative, which would involve the closure of Toland.
- *The initial study checklist does not comply with the CEQA Guidelines* - There is no specific format that is required for an Initial Study. The CEQA Guidelines provide an example, but do not require a specific format. The following is included in the CEQA Guidelines regarding the format of an Initial Study:

"Sample forms for an applicant's project description and a review form for use by the Lead Agency are contained in Appendices H and I. When used together these forms would meet the requirements for an Initial Study, provided that the entries on the checklist are briefly explained pursuant to subsection (d)(3). These forms are only suggested, and public agencies are free to devise their own format for an Initial Study." (Section 15063 (f))

Detailed analyses for the resource sections listed in the comment were included in Chapter 3.0 of the Draft EIR.
- *The discussion of Initial Study responses is inadequate* - As stated above, the Initial Study is a brief document used to assist in the preparation of an EIR. Issues discussed in the Initial Study were addressed in more detail in the Draft EIR.

Response 61-15

1. As discussed in Response 61-14 above, VRSD is the appropriate lead agency for the proposed project, pursuant to Section 15051(a) of the CEQA Guidelines that identify the criteria for determining the lead agency.
2. The EIR will be used by various local and state agencies in their consideration of the various permits required for the project (Section 1.6 of the Draft EIR). The County, as a responsible agency, is required by the CEQA Guidelines "...to assist the Lead Agency in preparing adequate environmental documents for the project. By this means, the Responsible Agency will ensure that the documents it will use will comply with CEQA" (Section 15096(b)). If the County believes the EIR is not adequate, CEQA outlines subsequent measures to be followed to assure that concerns of a responsible agency are addressed. In addition, responsible agencies can add measures to mitigate concerns through the permitting process.

Response 61-16

1. It is unclear as to what this comment is referring to regarding the proposed project being a "modification." As stated in Section 1.4.1 of the Draft EIR, the proposed project is a vertical and lateral expansion of the existing landfill, and an increase in the daily tonnage to 1,500 tpd.
2. CEQA requires state and local government agencies to consider the environmental consequences of projects over which they have discretionary authority, prior to taking action on those projects. Whether this is considered a new project or an expansion of an existing land use, the environmental process is the same. Under either scenario, an EIR is required to evaluate and disclose the potential environmental impacts of the proposed project.

Response 61-17

1. Nuisance issues were evaluated based on the potential impacts of the proposed project, not the current operations at Toland. The existing nuisance conditions at Toland are minimized by procedures and requirements implemented by VRSD, not by the amount of waste that is accepted. As discussed in Section 3.14 of the Draft EIR, the conclusion that there would be no significant nuisance impacts was based on: (1) analysis of the potential nuisance impacts of the proposed project; and (2) implementation of operational procedures and regulatory requirements, and mitigation measures included in the Draft EIR.
2. Standards for the control of nuisances at solid waste disposal sites, and for the control of litter along roads and highways is set forth in: CCR Title 14, Division 7, Minimum Standards for Solid Waste Handling and Disposal; County APCD rules and regulations; County General Plan; California Vehicle Code; and by the County Environmental Health Division. These standards apply to all solid waste disposal sites and do not change according to the amount of waste accepted.

Response 61-18

1. While this comment is correct that the U.S. Supreme Court has ruled that public/political jurisdictions (e.g., county, city, state) may not pass laws, regulations, or ordinances that prohibit the importation of waste for disposal at a landfill within their jurisdiction, the owner/operator of a landfill is not prohibited from making or agreeing to a condition not to accept waste from outside a public/political jurisdiction. Therefore, VRSD's decision that, as part of the proposed project (see Section 2.1 of the Draft EIR), Toland would only accept waste

generated in the County or waste from transfer stations/materials recovery facilities located in the County is not prohibited by the ruling of the U.S. Supreme Court. Therefore, the EIR has not underestimated the traffic, energy and air quality impacts of the proposed project.

2. VRSD will work directly with the County to develop a mutually agreeable mechanism as part of the CUP to enforce the provision that Toland would only accept waste generated in the County or waste from transfer stations/materials recovery facilities located in the County.

Response 61-19

1. In accordance with Section 15126 (d) of CEQA, the selection of alternatives shall be based both on the feasibility of attaining basic project objectives and on the potential to reduce or eliminate or reduce significant environmental impacts. The guidelines specify that the discussion must focus on alternatives capable of reducing environmental impacts, "even if such alternatives would be more costly or to some degree would impede the project's objectives." The project objectives are defined by the project proponent, but CEQA does not limit these to environmental objectives. As noted by this commenter, it is acknowledged that "low cost" is not an environmental objective, however, that it can be included in the EIR as an objective of the project.
2. The scope of alternatives evaluated in Chapter 4.0 of the Draft EIR was not limited by the project objectives. Numerous out-of-County alternatives are evaluated including the Chiquita, Sunshine, and Elsmere (proposed) landfills in Los Angeles County, and existing and proposed rail-haul facilities in southern California as well as Carbon Canyon Landfill in Utah. In addition, the definition of project objectives did not limit the analysis of in-County landfills to existing facilities. In accordance with CEQA, a comparative analysis is provided for each alternative in Chapter 4.0 of the Draft EIR, including its ability to meet project objectives and its ability to eliminate or reduce environmental impacts relative to the proposed project.

Response 61-20

1. No potential project alternatives were eliminated by the statement of need for the proposed project. Section 1.2.2 of the Draft EIR described the regulatory requirement for long-term solid waste disposal capacity for the County and reviewed current waste generation trends. A specific review of surrounding landfills is not included in this section, nor does this section "...assume that none of [the surrounding] landfills will continue to accept waste."

2. Existing landfills in the County and surrounding counties as alternatives to the proposed project were evaluated in Chapter 4.0 of the Draft EIR. Simi Valley and Chiquita Canyon landfills, the examples provided in this comment, were evaluated in Sections 4.2.1 and 4.3.1.1, respectively, of the Draft EIR.

Response 61-21

1. As discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion program implemented under AB 939, it is estimated by the County in its Draft Countywide Landfill Siting Element that the County only has nine years of remaining landfill capacity (County, 1995a).

Response 61-22

1. The alternatives analysis in Chapter 4.0 of the Draft EIR is comprehensive, objective, and meaningful. As discussed in Response 61-19 above, the definition of project objectives did not limit the consideration of alternatives. In addition to the No Project alternative, the Draft EIR evaluated the following 32 alternatives:

<u>Alternative</u>	<u>Number Evaluated</u>
In-County landfills (waste transport by truck)	1
Out-of-County (waste transport by truck)	4
Rail-haul alternatives	4
Offsite alternative location (within County)	20 ⁽¹⁾
Resource Recovery	1
Reduced Recovery	1
No Project	<u>1</u>
TOTAL	32

(1) Comparative impact analysis of top 20 sites identified in previous siting studies (VRSD Siting Study, CoSWMP, and Weldon Canyon EIR).

2. The potential for surrounding landfills to accommodate waste proposed to be disposed at Toland under the proposed project is discussed in the respective sections within Chapter 4.0 of the Draft EIR. The need for landfill capacity in both the short-term and long-term is documented in the EIR. This finding is confirmed by a recent CIWMB report which lists Ventura County as one of twenty-one counties statewide which has less than 15 years remaining disposal capacity (CIWMB, 1995). In addition, as discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion program implemented under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County has only nine years of remaining landfill capacity (County, 1995a).

Response 61-23

1. Sections 3.8.1.1.1 and 3.8.3.1.1 of the Draft EIR discussed the relationship of the County General Plan's Goals, Policies and Programs to the proposed project and reviewed policies specifically related to solid waste facilities. Typically, a review of the proposed project for consistency with the General Plan is conducted by the County in conjunction with processing the CUP. Within the EIR, policies related to resources, hazards, land use, and public facilities are analyzed within the respective impact and mitigation sections for each topical area.

Response 61-24

1. The Draft EIR described the potential impacts and measures (operational, regulatory, and mitigation) to avoid or reduce impacts below a level of significance. Table 1.1 of the Draft EIR, summarized potential impacts and mitigation measures for the proposed project. It is unclear from the comment as to what specific impacts the commenter believes were not completely analyzed.

Response 61-25

1. The Draft EIR identified significant impacts associated with the proposed project and mitigation measures that would avoid or reduce these impacts. As summarized in Section 1.3.2 of the Draft EIR and as discussed in detail in the topical sections of Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.
2. As discussed in Section 1.3.2 of the Draft EIR, specific statements of overriding considerations would be required for the three significant unavoidable impacts noted above. These statements of overriding considerations would be considered by the VRSD Board of Directors during its hearing to consider certification of the EIR.

Response 61-26

1. The California condor (*Gymnogyps californianus*) was not observed nor is it expected to occur within the project site (Hunt, 1995; CDFG, 1995). The California Condor is unlikely to occur in the area since the U.S. Fish and Wildlife Service has stopped: (1) releasing condors in Ventura County; (2) recaptured previously released birds; and (3) is now pursuing a release program only in northern Santa Barbara County.

Response 61-27

1. Sufficient geologic and geotechnical investigations and analyses have been performed to characterize the site and to determine if geologic conditions at the site could represent a significant impact to the proposed project. Information from pertinent investigations, analyses and references regarding the geologic conditions at the site were analyzed and used to support the findings included in Section 3.2 of the Draft EIR. Chapter 6.0 lists the various regional and site specific geologic reports and investigations referenced in Section 3.2 of the Draft EIR. Table 6.1 of the Draft EIR lists specific technical reports prepared to support the Draft EIR and includes the *Focused Geologic Investigation* report (Environmental Solutions, Inc., 1995a) and *Faulting and Seismicity Technical Report* (Environmental Solutions, Inc., 1995b) prepared for the proposed project. These technical reports were prepared for the proposed project, are incorporated by reference into the EIR, and are part of the administrative record for the project
2. The *Focused Geologic Investigation* report includes the results of detailed geologic trenching to investigate and define a bedrock feature identified by Fugro West, Inc. (Fugro, 1992). In conjunction with the extensive geologic trenching accomplished by Fugro (Fugro, 1992), the *Focused Geologic Investigation* of Toland found that Holocene age faults are not present within 200 feet of the footprint of the proposed project and, therefore, the proposed project would meet the landfill site criteria regarding Holocene age faults included in CCR Title 23, Chapter 15 (Environmental Solutions, Inc., 1995a).
3. Regarding the landslides, mud flows, and debris flows at the site, based on the geologic trenching conducted at the site, these features are surficial in nature and are not deep seated (Fugro, 1992; Environmental Solutions, Inc. 1995a). These surficial features would be excavated as part of the proposed project. As Toland is a canyon landfill, infilling the canyon area with waste would buttress the slopes against future failure. The geologic investigations at the site have determined that these existing surficial features would not represent a geologic

hazard to the proposed project, nor would the proposed project result in geologic hazards. Since the detailed design of the proposed project has not been completed however, a mitigation measure was included in Section 3.2.7 of the Draft EIR to require a slope or foundation stability report be prepared for the final design. The inclusion of this mitigation measure does not defer detailed geologic investigations until excavation as suggested by this comment. As discussed above, detailed geologic investigations have been accomplished to support the preparation of the Draft EIR.

4. The *Faulting and Seismicity Technical Report* prepared for the proposed project includes a detailed discussion of the following:
 - Project area and project site specific tectonic setting.
 - Project area and project site specific faulting and seismicity, including identification of the near-field and far-field controlling faults for the site.
 - Project area and project site seismic hazards.
 - Slope stability and landfill deformation analyses for the proposed project, including static stability analyses, pseudo-static stability analyses, one-dimensional dynamic site response analyses, and seismically-induced deformation analyses.

5. As detailed in the *Faulting and Seismicity Technical Report*, and as summarized in Section 3.2 of the Draft EIR, the seismic analyses conducted for the proposed project were based on data for faults within a 100 kilometer radius of the site. This radius was selected to include the potential effects of major near-field faults (e.g., San Cayetano and Oak Ridge) and regional far-field faults (e.g., San Andreas, White Wolf, Sierra Madre-San Fernando, and Newport-Inglewood). The data for the analyses include recent publications on faulting and seismic activity in the Ventura and Los Angeles basins, including published data regarding the January 1994 Northridge earthquake. The seismic analyses conducted for the proposed project were based on a probabilistic analysis to determine the site-specific peak ground acceleration (PGA) for the 100-year and 2,400-year return period ground motion as required by CCR Title 23 and Subtitle D, respectively, and were based on the maximum potential earthquake (MPE) for the faults within the 100-kilometer radius.

6. As discussed in Section 3.2 of the Draft EIR, the analyses conducted for the proposed project determined that a PGA of 1.0g from the MPE could affect the site. The analyses also determined that the proposed design for the expansion of Toland (i.e., excavation and fill plans, and base liner system) would result in stable landfill slopes under static and seismic conditions (Environmental Solutions, Inc., 1995b).

7. The *Faulting and Seismicity Technical Report* concluded that the preliminary design for the proposed project would be stable for the 100-year and 2,400-year return period ground motion from the MPE. It also indicated that further evaluation of the landfill slope and base liner system could be accomplished during the detailed design phase of the project to allow for refinement and optimization of the project design. Depending on the requirements of VRSD, the additional evaluations could include three-dimensional static and pseudo-static slope stability analyses, and two-dimensional dynamic response analyses. While the additional studies could refine the design of the propose project, they would not result in a change in the findings of the analyses conducted to date that the preliminary design of the proposed project would be stable for a PGA of 1.0g based on the MPE that could affect the site.
8. Since the detailed design of the proposed project has not been completed, a mitigation measure was included in Section 3.2.7 of the Draft EIR to require a slope or foundation stability report be prepared for the final design. The inclusion of this mitigation measure does not defer detailed geologic investigations until excavation as suggested by this comment. As discussed above, detailed geologic investigations, including detailed seismic analyses have been accomplished to support the preparation of the Draft EIR.

Response 61-28

1. As discussed in Section 3.1.4 of the Draft EIR, based on the County General Plan and the designation of the area between Santa Paula and Fillmore as greenbelt, it is reasonable to assume that these areas would remain primarily open space and agricultural. As discussed in Section 3.11.4.1 of the Draft EIR, an identification of specific projects which would generate future traffic would, therefore, not be meaningful in projecting overall, future Highway 126 traffic in the project vicinity. The analysis, was therefore, based on Caltrans' projection of a 79 percent increase by 2015. This conservative projection of an increase of approximately 16,600 ADTs, more than adequately addresses the potential impact of the 190 additional trucks for the S.P. Milling Company's Sycamore Ranch Project identified as a concern in this comment.
2. Regarding the request for an extension of the public review and comment period for the Draft EIR, VRSD sent a letter to the commenter indicating the reason that an extension would not be granted.

Response 61-29

1. Vehicle emissions estimates in Section 3.12 of the Draft EIR are based on the most recent version (EMFAC7F1.1) of CARB's emission factor computer model, which takes into account standardized test cycles and nonstandard conditions. Inputs used in the model include type of vehicle, fuel, speed, control technology (e.g., catalytic), ambient temperature, and year (up to 2020 is available). These emission factors, the most detailed available, were selected for purposes of the Draft EIR for heavy-duty diesel trucks traveling at 25 mph on Toland Road.
2. CARB confirms that specific emission factors have not been developed to simulate trucks ascending grades (CARB, 1995), therefore, increased emissions associated with trucks ascending Toland Road are considered to be included in the standard emission factors from CARB. The potential significance of these emissions and resulting ambient concentrations is interpreted by reference to state and federal ambient air quality standards. These standards were developed to protect human health with an adequate margin of safety and are concentrations averaged over time periods that vary from one hour to one year. These averaging times remove much of the detailed variability that exists in emission sources, especially in mobile sources with engine loading that varies continuously based on factors such as accelerator position and road grade.
3. Further context for the appropriateness of using standard emission factors comes from the observation that vehicular air emissions in the vicinity of Toland are influenced far more by nonproject-related traffic volumes on Highway 126 than from project-related traffic volumes. As noted in Section 3.11.4 of the Draft EIR, 1.2 to 2.3 percent (i.e., the "proposed case" and "worse case," respectively, as defined by the Draft EIR) of the 36,735 vehicles per day that are estimated to use Highway 126 in 2015 (furthest projection available from Caltrans) would be associated with the proposed project. The other 36,735 to 37,150 vehicles will emit 97 to 98 percent of the total mobile source emissions associated with traffic on Highway 126.
4. The traffic study for the proposed project estimated that the average wait to make a left turn from State Route 126 (eastbound) onto Toland Road is approximately 19 seconds during the peak morning hour and 14 seconds during the peak evening hour.

Response 61-30

1. The meaning of "...inadequate plan implementation..." by the cities of Oxnard and Ventura in this comment is unclear. Solid waste management is a regional issue that typically involves the County and its cities.
2. This commenter is correct in noting that comprehensive landfill siting studies have previously been conducted to locate sites within Ventura County. These studies, conducted by the County and by VRSD are summarized in Section 4.5.2.1 of the Draft EIR. The Draft EIR also discusses findings in these studies which relate to the Toland site.
3. In regards to Toland not being "one of the best places", it is probable that this commenter is referencing the VRSD Siting Study (EMCON, 1991). This study did not specifically analyze Toland, but included a site designated as the O'Leary site which encompasses the Toland property. As discussed in Section 4.5.3.3.10 of the Draft EIR, the O'Leary Canyon site (approximately 450 acres) encompasses the majority of the proposed 213-acre project site (see Figure 3.8.7 of the Draft EIR). The project site, however, does not encroach into O'Leary Canyon. The rankings for the O'Leary Canyon site are not, therefore, directly transferable to the Toland site. Several natural resources and development constraints occur on the O'Leary Canyon site which do not occur on the Toland site.
4. An explanation of VRSD Study site rankings compared to the objectives and site boundaries of the proposed project is included in Section 3.8.3.1.5 of the Draft EIR. Included as Table 3.8.3 is a ranking of the Toland site based on the 1991 VRSD Study criteria. An overview of each of the VRSD Study sites, including the top ranking sites, is included in Section 4.5.3 of the Draft EIR.

Response 61-31

1. The alternatives analysis in Chapter 4.5 of the Draft EIR included the evaluation of 20 offsite alternatives. As shown in Figure 4.4 of the Draft EIR, several of these sites are located closer to the Gold Coast Recycling and Oxnard Transfer Stations. None of these sites, however, were determined to provide the opportunity to eliminate significant impacts or reduce overall environmental impacts compared to the proposed project. Potential environmental impacts associated with each of the alternative sites is summarized in Table 4.7 of the Draft EIR.

Response 61-32

1. The proposed project consists of both a vertical and lateral expansion of Toland. The vertical expansion component of the proposed project includes the placement of additional waste on top of waste already landfilled at the site. Vertical expansions of existing landfills are allowed by state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) without a requirement to excavate previously landfilled waste to allow the installation of a composite liner system. Lateral expansions of existing landfills are required by state and federal regulations to include a composite liner system. Therefore, based on state and federal landfill regulations, the proposed project includes a composite liner for the lateral expansion component of the project.
2. As discussed in Section 2.5.1 of the Draft EIR, for the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot thick low permeability intermediate soil barrier would be installed. Incorporated with the intermediate soil barrier is a landfill gas collection system, and leachate collection and removal system. The design of the intermediate soil barrier system shall take into account the overburden weight of the new waste and shall account for any settlement that may occur.
3. The intermediate soil barrier to isolate the existing waste from the new waste is not required by state or federal landfill regulations for vertical expansions, however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.
4. In addition, as discussed in Section 3.3 of the Draft EIR, based on the geologic and hydrogeologic conditions at Toland, and the landfill regulatory requirements included in CCR Titles 14 and 23, and Subtitle D (e.g., composite liner system, landfill gas collection system, leachate collection and removal system, etc.) the proposed project would not impact ground water quality.

Response 61-33

1. No alteration in drainage patterns or dewatering would occur under the proposed project to impact the seeps. Therefore, there will be no direct or indirect impacts to the seeps.

Response 61-34

1. As discussed in Section 3.11.2.5 and depicted on Figure 3.11.4 of the Draft EIR, based on records from Caltrans, the accident rate along Highway 126 in the vicinity of the proposed project site is substantially lower than the statewide average. The highway is a four-lane divided roadway in the vicinity of Toland. Higher accident rates occur east of the project site, particularly east of Fillmore where the highway is only two lanes (with periodic passing lanes). Since the proposed project would not contribute to additional traffic east of Toland Road, it is not anticipated to appreciably increase the accident risk along Highway 126 east of Toland Road. In addition, because the proposed project would represent approximately 2.3 percent of the future average daily trips (ADTs) for the "worse case" traffic scenario (i.e., packer trucks to transport waste to Toland) on Highway 126 and 1.2 percent of the ADTs for the "proposed case" traffic scenario (i.e., transfer trucks to transport waste to Toland), the proposed project is not anticipated to appreciably increase the accident risk along Highway 126.

2. The accident data included in Section 3.11.2.5 of the Draft EIR was provided as baseline traffic information and was not meant to imply that the accident rate would remain constant under future conditions. Historical information is, however, relevant in assessing the potential for future accidents. The first step in highway accident prevention is to have accurate and detailed information of circumstances surrounding past accidents (Oglesby and Hicks, 1982). Section 3.11.3.1.3 of the Draft EIR provides the rationale to support the conclusion that the accident risk along Highway 126 is not anticipated to appreciably increase due to the proposed project.

3. The traffic study prepared for the proposed project employed the methodologies recommended by Caltrans for intersection capacity analysis, signal warrants, and highway design. These methodologies have been developed both to optimize traffic flow and assure traffic safety. In addition, as part of its review of the Draft EIR and the supporting traffic study for the proposed project, Caltrans independently performed the signal warrant analysis and concurred that signal warrants are not met for the Toland Road/Highway 126 intersection (see Comment Letter 02). Based on its review, Caltrans recommended the installation of an intersection control flashing beacon, intersection lighting, and warning signs (see Comment Letter 02). These improvements are included in the EIR as mitigation measures and would mitigate potential traffic-related safety issues at the intersection.

4. Notwithstanding Caltrans' determination that a signal is not required at the intersection of Toland Road and Highway 126, in the event at some time in the future Caltrans decides a signal is required, VRSD has agreed to pay the cost for the signal. While this is not a mitigation measure in terms of CEQA, VRSD would accept a condition to this effect in the CUP for the proposed project.

Response 61-35

1. As discussed in the Section 3.12.3 of the Draft EIR, air emissions associated with the proposed project would be accompanied by corresponding emissions reductions at Bailard as landfilling operations shift to Toland. Shifting landfilling operations from Bailard to Toland reflects a realignment of waste disposal within the County, and does not represent an increase over the baseline emissions inventory for the County. Therefore, on a County-wide basis, air emissions associated with the proposed landfill operations and onsite equipment at Toland would not represent a significant emissions impact.
2. Notwithstanding that the proposed project represents a shift of air emissions associated with solid waste disposal activities on a County-wide basis, as discussed in Section 3.12.3.2.1 of the Draft EIR, the proposed landfill operations and onsite equipment at Toland were analyzed to determine if the proposed project would result in the exceedance of state or federal ambient air quality standards at or beyond the project boundary. As documented in the Draft EIR, the proposed project would not result in state or federal ambient air quality standards being exceeded at or beyond the project boundary. Therefore, based on the significance thresholds developed by APCD, the air quality impacts associated with the onsite operations under the proposed project would be below a level of significance both on a County-wide and local basis.
3. As discussed in Section 3.12.3 of the Draft EIR, offsite mobile air emissions resulting from the additional vehicle miles traveled to Toland versus Bailard to transport 1,500 tons of waste per day, would result in a significant air quality impact on a County-wide basis. As discussed in the Draft EIR, however, the offsite mobile air emissions associated with the proposed project at Toland would be less than transporting 1,500 tons of waste per day to the Simi Valley or Chiquita Canyon landfills.

4. The project's potential impacts to ground water quantity within the Santa Paula-Sespe Basin and indirectly to the Oxnard Plain are addressed in Section 3.3.3.1.2 of the Draft EIR. As concluded in Section 3.3.8 of the Draft EIR, the mitigation measures as included in Section 3.3.7 would reduce the proposed project's incremental contribution to the cumulative overdraft condition of the Oxnard Plain to below a level of significance. A revised mitigation measure is included in Table 1.1 of this Final EIR that if the water for the proposed project is withdrawn from wells in the vicinity of Toland, VRSD shall reduce its water usage at the Bailard and Coastal landfills, or pay the County Public Works Agency to purchase water from the State Water Project to recharge the ground water basin.
5. The quality of water from offsite seeps is addressed in Section 3.3.2.2.2 of the Draft EIR. As concluded in the Draft EIR, based on an investigation conducted by Environmental Solutions, Inc. (1995d), Toland is not the source of seeps in the canyon area located northeast of the landfill, and hydrogeologic conditions preclude the landfill from being a potential source of surface water seeps located in the sidewalls of the canyon.

Response 61-36

1. The commenter's opposition to the proposed project is noted. See Response 61-34 above.

Response 61-37

1. The commenter's opposition to the proposed project is noted. The potential environmental impacts from noise, dust, and traffic, and the potential land use conflicts associated with Toland were evaluated in detail in the Draft EIR (see Sections 3.10, 3.12, 3.11 and 3.8, respectively). As summarized in Section 1.3.2 of the Draft EIR and as discussed in detail in the topical sections of Chapter 3.0 of the Draft EIR, the potential impacts of the proposed project would be reduced to below a level of significance with the implementation of the mitigation measures in the Draft EIR with the exception of the following:
 - Cumulative traffic impacts at the intersection of Toland Road and Highway 126 caused by nonproject-related traffic volumes on Highway 126.
 - Cumulative noise impacts at the Santa Clara School caused by nonproject-related traffic volumes on Highway 126.
 - Project-related and cumulative regional air quality impacts associated with offsite mobile emissions.

Response 61-38

1. As discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion programs implemented by the County and its cities under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County only has nine years of remaining landfill capacity (County, 1995a). Since the County cannot demonstrate 15 years of landfill capacity as required by AB 939, VRSD proposes to expand Toland to meet a portion of the long-term landfill capacity requirements for the County.

2. Chapter 4.0 of the Draft EIR included a detailed analysis of alternatives to the proposed project, including diversion to out-of-County landfills by truck and via rail-haul, increased recycling, and waste-to-energy. As discussed in Chapter 4.0 of the Draft EIR, none of these alternatives would eliminate or reduce significant impacts associated with the proposed project at Toland. In fact, as noted in Chapter 4.0, these alternatives would have similar or greater environmental impacts than the proposed project.

3. Chapter 4.0 of the Draft EIR provided the following discussion regarding the availability of existing landfills to accept waste from west Ventura County:
 - Chiquita Canyon Landfill (Chiquita): As currently permitted, Chiquita could only accept Ventura County waste until November 1997, when its CUP expires. While a proposed expansion is being considered that would extend the service life of Chiquita until approximately 2006, it is speculative as to whether Chiquita will be an operating landfill. If Chiquita is not expanded, waste from the west County and the Santa Clara Valley would have to be diverted to another landfill(s) beginning in November 1997.
 - Calabasas Landfill (Calabasas): Calabasas is operated by the Los Angeles County Sanitation Districts. A watershed ordinance adopted by the County of Los Angeles for this landfill limits its service area. Under the ordinance, Calabasas is allowed to accept waste from Ventura County based on historic importation patterns. Specifically, only waste from Thousand Oaks, Newbury Park, Oak Park, and surrounding areas can be accepted. This landfill, therefore, does not represent a short-term or long-term waste disposal alternative for waste from the west County or the Santa Clara Valley.
 - Rail•Cycle-Bolo Station Landfill (Bolo Station): Since the release of the Draft EIR in September 1995, the County of San Bernardino has conditionally approved Bolo Station. The approval is conditioned upon the approval by the voters of San Bernardino County of a business tax associated with importing waste to Bolo Station. The business tax is on the March 1996 ballot. Also on the ballot in March 1996, is a public initiative that would change the San Bernardino County zoning ordinance to prohibit large landfills, such as Bolo Station, from being sited within 10 miles of an aquifer. If the business tax is approved in March 1996, and the ballot initiative is not approved, Rail•Cycle estimates that the Bolo

Station may be permitted, constructed and operational by the fall of 1998. Therefore, under no set of circumstances would Bolo Station be able to meet the short-term waste disposal requirements of the west County or the Santa Clara Valley, and it remains speculative as to whether this landfill will become operational.

4. While certain types of projects are known to create a "demand" for development, there is no evidence that by providing capacity for disposal of solid waste that a landfill results in an increase in the volume of waste generated. Rather, the proposed project would provide for the environmentally safe disposal of the remaining 50 percent of the waste stream after the County and its cities meet the requirements of AB 939 to reduce the volume of solid waste requiring disposal by 25 and 50 percent by 1995 and 2000, respectively.

Response 61-39

1. The commenter's opposition to the proposed project is noted. The potential impacts from the proposed project to agricultural operations in the vicinity of Toland are addressed in Section 3.8.3.2.2 of the Draft EIR. Based on the analysis, it has been determined that the proposed project would not result in significant impacts to these agricultural operations and that the project would be consistent with the surrounding land uses.

Response 61-40

1. Cultural resources, as defined by CEQA and described in Section 3.6 of the Draft EIR, include prehistoric or historic places or objects that are important for scientific, historic, and/or religious reasons to cultures, communities, groups, or individuals. The impacts of the proposed project to cultural resources were analyzed in Section 3.6 of the Draft EIR, and no significant impacts to cultural resources are expected from the proposed project.
2. The purpose of an EIR is to disclose the environmental impacts of a proposed project. It is not feasible, to analyze the potential impacts to a highway's "image" or the psychological "damage" to the potential tourist industry. The elements of the proposed tourist industry are vague and to properly evaluate the potential cumulative impacts of the tourist industry and the proposed project, it would be necessary to have a project description.
3. It is recognized that the commenter's concerns regarding impacts to the potential tourist industry relates to the quality of life in the Santa Clara Valley. Quality of life is subjective, based on a

combination of many separate factors (e.g., visual character, surrounding land use, noise, traffic, etc.). These factors have been addressed individually in Sections 3.2 through 3.15 of the Draft EIR and will be taken into consideration by the lead and responsible agencies when making decisions on the proposed project.

4. Section 3.9 of the Draft EIR addressed the impacts to the aesthetic character and visual resources within the proposed project site and surrounding area, and discussed the potential aesthetic effects associated with the proposed project. The determination that there would be no significant impacts from the proposed project with regard to visual characteristics was based on the minimal amount of newly disturbed acreage associated with the proposed project, in addition to the project being a continuation of current landfilling activities. The increase in the height of the landfill, was also considered. As demonstrated in Figures 3.9.3 through 3.9.5 of the Draft EIR, the proposed project would not extensively alter the natural appearance of the area. Therefore, impacts are not considered significant.

Response 61-41

1. As discussed in Section 3.11.3.3 of the Draft EIR, Caltrans' guidelines for designing truck escape ramps were used to evaluate the potential impact for "runaway trucks" on Toland Road. According to Caltrans' guidelines, the accident rate attributed to runaway trucks is the key factor in determining the need for a truck escape ramp for a specific section of road. A primary reason trucks "lose their brakes" is overheating of the brakes over long, steep grades.
2. Prior to considering an escape ramp, Caltrans recommends warning signs regarding a steep grade and for trucks to use a low gear. Warning signs provide the driver information so that they may use engine braking and proper gear selection to minimize the potential for brake overheating.
3. Section 3.11.3.3 of the Draft EIR also put the downgrade on Toland Road into perspective with existing truck escape ramps in California. As shown on Table 3.11.9 of the Draft EIR, there are currently only 14 escape ramps in California. These ramps are located on major state or interstate highways, with high traffic volumes and a large percentage of trucks. As shown in the table, none of the existing escape ramps are located in Ventura County. Based on the above, and as concluded in the Draft EIR, it is clear that a truck escape ramp is not warranted on Toland Road.

Response 61-42

1. As discussed in Section 4.8 of the Draft EIR, tipping fees at Bailard are presently subsidizing Toland operations. Required improvements at Toland to meet state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) that would be required with or without the proposed project could not be amortized based on landfill revenues at the currently permitted 135 tpd disposal rate without the subsidy provided by Bailard. Therefore, for purposes of the EIR it is assumed that Toland would also close in the summer of 1996. Based on the assumption that Toland would close in the summer of 1996, the proposed project does not result in a reduction of waste disposal capacity for Santa Paula and Fillmore. In fact, the proposed project would provide waste disposal capacity for Santa Paula and Fillmore and the unincorporated areas of the Santa Clara Valley at Toland for 30 years.
2. The impacts associated with diversion of waste to a new or existing solid waste facility at the time of closure of Toland under the proposed project (in approximately 30 years) would be addressed at that time as part of the specific project being considered to replace Toland. To attempt to address these impacts at this time would be speculative as the alternatives for management of solid waste 30 years in the future are not known. Section 15145 of the CEQA Guidelines indicates that EIRs are not required to address issues that are speculative, therefore, the potential impacts associated with diversion of waste to a new or existing solid waste facility at the time of closure of Toland are not addressed in this EIR.

Response 61-43

1. The discussion of potential dust effects on agricultural crops in the Draft EIR used the lessons learned at Spadra and Highgrove landfills (Barnes, 1993) to note that no explicit impact of the landfills was found, and that dust emitted by agricultural activities on dirt roads within the orchards appeared to be far more important. The discussion in the Draft EIR did not include the details of dust effects on pest mites and their predators because the important issue is the contribution of the proposed project to the current dust load that already exists. The conclusions of the analysis are based on the model predictions of PM₁₀ concentration, which are not significant in comparison to the existing background concentration. If dust or leaves causes difficulties in integrated pest management, then the majority (i.e., 98 percent) cause of those difficulties would not be related to the proposed project.
2. As discussed in Section 3.12.7 of the Draft EIR, mitigation measures for the control of fugitive dust included, but were not limited to, watering of onsite unpaved roads, and flushing

or sweeping of onsite paved roads. The plan is to water unpaved roads, work areas, and storage piles to the extent that it can control fugitive dust without causing unpaved roads to become muddy or slippery (i.e., unsafe). An apron would be constructed at the juncture of the unpaved and paved roads to minimize trackout of dirt onto the paved road.

3. In response to this and other comments, a mitigation measure has been included in the EIR to install a wheel washing station that vehicles leaving the landfill active working face on the dirt road would pass through at the apron, which is the transition section at the end of the paved road where it becomes an unpaved road. The inclusion of this mitigation measure in this Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.
4. The wheel washing station would work in conjunction with the mitigation measures included in Section 3.12.7 of the Draft EIR that require the apron to be flushed with water often enough to assure that the tires cannot track out dirt or mud, and that the onsite paved road shall be swept or water flushed. This combination of measures would significantly reduce the amount of dirt vehicle tires would carry onto Toland Road.
5. Also based on this and other comments, a mitigation measure has been included in the EIR that shall require VRSD to pave, or pay the cost to pave, unpaved roads in the vicinity of Toland to mitigate the PM₁₀ generated by the proposed project. The linear feet of unpaved road to be paved shall be developed in consultation with the APCD and shall be sufficient to offset the PM₁₀ concentrations from project sources (i.e., offsite mobile emissions and onsite emissions). Based on a preliminary analysis, paving approximately 27,500 linear feet (i.e., approximately 5.2 miles) of unpaved roads in the vicinity of Toland would offset the PM₁₀ emissions generated by the "worse case" traffic scenario (i.e., 450 vehicles per day versus the "proposed case" of 210 vehicles per day). The actual linear feet of unpaved road to be paved to offset the PM₁₀ generated by the proposed project would be based on the number of vehicles traveling to the site on a daily basis. Therefore, potential impacts from the emission of fugitive dust from these dirt roads before paving will be decreased the same amount that the potential impact of the PM₁₀ emissions from the proposed project. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 61-44

1. As discussed in the Section 3.11.3.1.2 of the Draft EIR, excessive vehicle stacking for the eastbound left turn movement from Highway 126 to Toland Road is not anticipated since the left-turn pocket provides adequate storage length. Based on peak hour estimates for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The Caltrans design standard, based on the number of turning vehicles likely to arrive in an average two minute period during peak hour, for vehicle storage in the left-turn pocket would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car). The existing 120-foot, left-turn pocket for eastbound traffic exceeds this requirement.
2. Under the "proposed case" and the use of transfer trucks, during the peak hour a waste truck would arrive at the intersection an average of once every 10 minutes. Based on the longer truck length for transfer vehicles, the required left-turn storage length for the "proposed case" would be 85 feet (60 feet per transfer truck and 25 feet for the passenger car). Based on the Caltrans design standard, therefore, depending on whether packer trucks or transfer trucks are used, the required left-turn pocket length at the intersection of Toland Road and Highway 126 would range between 65 feet and 85 feet. The existing 120-foot left-turn pocket and configuration at this intersection and approach lanes, as shown in Figure 3.11.3 of the Draft EIR, provides waste trucks and other vehicles adequate distance to safely approach the intersection.
3. This comment also expressed a concern regarding the environmental effects of truck acceleration and deceleration on Toland Road. Vehicle emissions estimates in Section 3.12 of the Draft EIR are based on the most recent version (EMFAC7F1.1) of CARB's emission factor computer model, which takes into account standardized test cycles and non-standard conditions. Inputs used in the model include type of vehicle, fuel, speed, control technology (e.g., catalytic), ambient temperature, and year (up to 2020 is available). These emission factors, the most detailed available, were selected for purposes of the Draft EIR for heavy-duty diesel trucks traveling at 25 mph on Toland Road.
4. The effect of the grade of Toland Road is also considered in the noise analysis for the proposed project. Noise measurements of waste trucks were taken along a steep portion of Toland Road (approximately 8 percent grade) to determine the potential impact of truck noise on surrounding sensitive uses (MGA, 1995). The noise level data was incorporated into Section 3.10.3.3 of the Draft EIR.

5. With respect to the comment that the Draft EIR's analysis of air quality, noise and traffic impacts was too narrow geographically, it should be noted that the project would not generate additional waste truck traffic east of Toland Road. Noise and traffic levels proximate to Fillmore would, therefore, not increase due to the proposed project. The number of vehicles transporting waste from the Santa Clara Valley (Santa Paula, Fillmore, the community of Piru and other unincorporated areas) is expected to continue to be at a maximum of approximately 70 per day.

6. It is recognized that project traffic would affect Highway 126 and intersections with this arterial west of Toland Road. However, even under the "worse-case" (i.e., packer trucks) traffic scenario, project-related traffic would represent approximately 2.3 percent of the future ADTs on Highway 126 (see Section 3.11.4.1 of the Draft EIR). The proposed project's contribution to the traffic-related cumulative noise impact would be a maximum increase of 0.6 dBA under the "worse case" traffic scenario for 2015, and the additional traffic would not substantially affect intersections other than Toland Road and Highway 126. Nonproject-related traffic, air quality and noise conditions along Highway 126 represent a regional issue and are not the responsibility of VRSD. Mitigation measures for the nonproject-related cumulative impacts were, therefore, not proposed as part of the proposed project.

Response 61-45

1. The proposed project would not result in new or additional air pollution-related health stress on senior citizens or other sensitive individuals because the majority of the air emissions related to disposing of solid waste are not changing within the County when landfilling moves from Bailard to Toland.

2. Section 3.12.3 of the Draft EIR provides the discussion of air emissions from the proposed project and the modeling of ambient air concentrations caused by these emissions. Table 3.12.10 of the Draft EIR shows that the peak concentration caused by the proposed project plus the background concentration would not exceed state or federal national ambient air quality standards. The ambient air quality standards have been established by the state and federal government at concentrations that protect human health from known effects, and include an adequate margin of safety.

3. Section 3.13 of the Draft EIR provides an additional discussion regarding the health risks of the proposed project's air emissions including criteria pollutants and toxic air contaminants.

As can be seen in Table 3.13.2 of the Draft EIR, carcinogenic and non-carcinogenic (chronic and acute health hazards) health risks from the proposed project are orders of magnitude lower than significance thresholds. Thus, even the more susceptible individuals, including senior citizens and young children, would not be subjected to significant health effects from the proposed project.

Response 61-46

1. Sufficient geologic and geotechnical investigations and analyses have been performed to characterize the site and to determine if geologic conditions at the site could represent a significant impact to the proposed project. Information from pertinent investigations, analyses and references regarding the geologic conditions at the site were analyzed and used to support the findings included in Section 3.2 of the Draft EIR. Chapter 6.0 lists the various regional and site specific geologic reports and investigations referenced in Section 3.2 of the Draft EIR. Table 6.1 of the Draft EIR lists specific technical reports prepared to support the Draft EIR and includes the *Focused Geologic Investigation* report (Environmental Solutions, Inc., 1995a) and *Faulting and Seismicity Technical Report* (Environmental Solutions, Inc. 1995b) prepared for the proposed project. These technical reports were prepared for the proposed project, are incorporated by reference into the EIR, and are part of the administrative record for the project
2. The *Focused Geologic Investigation* report includes the results of detailed geologic trenching to investigate and define a bedrock feature identified by Fugro West, Inc. (Fugro, 1992). In conjunction with the extensive geologic trenching accomplished by Fugro (Fugro, 1992), the *Focused Geologic Investigation* of Toland found that Holocene age faults are not present within 200 feet of the footprint of the proposed project and, therefore, the proposed project would meet the landfill site criteria regarding Holocene age faults included in CCR Title 23, Chapter 15 (Environmental Solutions, Inc., 1995a).
3. Regarding the landslides, mud flows, and debris flows at the site, based on the geologic trenching conducted at the site, these features are surficial in nature and are not deep seated (Fugro, 1992; Environmental Solutions, Inc. 1995a). These surficial features would be excavated as part of the proposed project. As Toland is a canyon landfill, infilling the canyon area with waste would buttress the slopes against future failure. The geologic investigations at the site have determined that these existing surficial features would not represent a geologic hazard to the proposed project, nor would the proposed project result in geologic hazards.

Response 61-47

1. Toland does not currently attract birds and is not used as a loafing area by gulls. It is speculative as to whether gulls or other bird species would be attracted to Toland due to the proposed project. Similarly, it is speculative as to whether gulls would come in conflict with the Santa Paula Airport. Issues that are speculative cannot be evaluated, therefore, the possibility that Toland may attract gulls or other bird species and the potential that gulls could come in conflict with the Santa Paula Airport is not addressed in the EIR. Toland would be operated in compliance with CCR Title 14, including the following operational procedures (see Section 3.14.5 of the Draft EIR) that are known to be effective in minimizing birds at landfills:
 - Compaction of waste at the active working face.
 - Periodic 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.
 - The working face would be kept as small as safely practicable, given the type of and number of landfill equipment working there.
 - An active litter control program.

2. As discussed in Section 3.14.3.1.1 of the Draft EIR, in the event birds are determined to be a nuisance at Toland additional measures would be implemented and may include, but not be limited to, the use of an overhead nylon line grid system (bird wires), distress tapes, propane cannons, and/or habitat manipulation/modification. The effectiveness of these measures would be monitored and, if found not to be effective, additional measures would be developed. To formalize this requirement, a mitigation measure has been included in this Final EIR regarding the use of additional measures in the event birds are determined to be a nuisance at Toland. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 61-48

1. As discussed in Section 2.1 of the Draft EIR, VRSD has indicated that Toland would only accept waste generated in the County or waste from transfer stations/materials recovery facilities located in the County. VRSD will work directly with the County to develop a mutually agreeable mechanism as part of the CUP to enforce this provision of the proposed project.

2. VRSD does not control the transfer stations/materials recovery facilities in the County (i.e., City of Oxnard recycling center and Gold Coast recycling in the City of Ventura), therefore, it cannot prohibit these facilities from accepting out-of-County waste.

Response 61-49

1. Based on NPDES permit requirements under the Federal Clean Water Act and administered by the RWQCB, if stormwater has the potential to come in contact with activities such as equipment maintenance areas, measures must be included to assure that it has not become degraded prior to discharge. Since landfill equipment would be serviced, maintained and cleaned at the operations and maintenance center, there is a potential that stormwater runoff from portions of the operations and maintenance center could become degraded with oil and grease. While the final design of the landfill has not been completed, to be conservative, Section 2.5.3.1 of the Draft EIR indicated that if stormwater may potentially be degraded at the operations and maintenance center that it would be collected in a sump. If stormwater from the operations and maintenance center is determined to be degraded, it would be transported on an as-needed basis to an offsite wastewater treatment facility.

Response 61-50

1. Landfill gas flare systems are routinely required and installed at most major landfills. In accordance with APCD Rule 74.17, a landfill gas collection and destruction system must be installed when the cumulative decomposable portion of waste at the landfill reaches 500,000 tons. The flare would be operated 24 hours per day, 7 days a week, however, the flares consist of an internal combustion chamber and there is no visible flame or glow from the flare so it would not be visible at night. As the flame is not exposed, the flare would not represent a potential ignition source for onsite or offsite fires.
2. Flare systems include various monitoring capabilities that incorporate gas flow rate, oxygen content, low temperature indicator, and "flame out" indicator. Monitoring can occur at the site or it can be accomplished from an offsite location if the data is transmitted by modem.

Response 61-51

1. The proposed project consists of both a vertical and lateral expansion of Toland. The vertical expansion component of the proposed project includes the placement of additional waste on top

of waste already landfilled at the site. Vertical expansions of existing landfills are allowed by state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) without a requirement to excavate previously landfilled waste to allow the installation of a composite liner system. Lateral expansions of existing landfills are required by state and federal regulations to include a composite liner system. Therefore, based on state and federal landfill regulations, the proposed project includes a composite liner for the lateral expansion component of the project.

2. As discussed in Section 2.5.1 of the Draft EIR, for the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot thick low permeability intermediate soil barrier would be installed. The intermediate soil barrier is not required by state or federal landfill regulations for vertical expansions, however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.

Response 61-52

1. The potential impacts from fires originating at the landfill was discussed in Section 3.15.3.1.1 of the Draft EIR. The potential of fires being caused by landfill operations or personnel is considered remote, as the landfill is barren, uncovered waste during operations is kept small, and there is no exposed waste at the end of the day that could catch fire. In addition, the Draft EIR described the operational procedures and regulatory requirements that would reduce or eliminate the potential impacts. These were described in Section 3.15.5 of the Draft EIR and include:

- Daily cover and fill operations.
- 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 the 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 at the landfill.
- Monitoring of materials admitted to the site to assure "hot loads" are not buried to the working face.
- Maintenance of small working face.

As stated in Section 3.15.7 of the Draft EIR, mitigation measures would not be required, although adherence to procedures, regulations and permit conditions shall be necessary

throughout operation and closure/postclosure of Toland to assure potential impacts associated with fires are not significant.

Response 61-53

1. The projected traffic flow for the proposed project by vehicle type is included for both the "proposed case" and "worse case" traffic scenarios in Appendix F of the Draft EIR. The number of vehicles for the "worse case" scenario are based on existing operations at Bailard. The footnotes included in Table F.2 of Appendix F provide the assumptions used in the methodology as well as waste transport data from Bailard's record for 1994.

Response 61-54

1. Based on the volume of stormwater that could flow from the site during the 100-year, 24-hour storm event, the detention basin would be approximately 250 feet by 150 feet and 10 feet deep. Construction of the detention basin would require a NPDES from the RWQCB under the Federal Clean Water Act as a point source discharge for stormwater, and would require a building permit from the County Building and Safety Division.
2. The maximum water release rate from the detention basin would be equal to the current stormwater discharge rate from the site for the 100-year, 24-hour storm event. Based on the preliminary hydrology calculations in Appendix C of the Draft EIR, the current stormwater discharge rate from the site is estimated to be 337 cubic feet per second (cfs). The detained stormwater would be released from the basin via a pipe sized to limit the outflow to a maximum of 337 cfs. As the release of water from the detention basin would be through a pipe sized to a maximum of 337 cfs, there would be no requirement to monitor the outflow volume. The detention time in the basin provides the mechanism through which the sediment in the water settles to the bottom of the basin. Collected sediments would be removed routinely as part of regular maintenance activities at the landfill.

Response 61-55

1. In response to this and other comments, a mitigation measure has been included in the EIR to install a wheel washing station that vehicles leaving the landfill active working face on the dirt road would pass through at the "apron," which is the transition section at the end of the paved

road where it becomes a dirt road. The inclusion of this mitigation measure in this Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

2. The wheel washing station would work in conjunction with the mitigation measures included in Section 3.12.7 of the Draft EIR that require the apron to be flushed with water often enough to assure that the tires cannot track out dirt or mud, and that the onsite paved road shall be swept or water flushed. This combination of measures would significantly reduce the amount of dirt vehicle tires would carry onto Toland Road.
3. The background PM₁₀ concentration data from the Piru monitoring station was used for purposes of the Draft EIR based on a recommendation from APCD. Subsequent to preparation of the Draft EIR, APCD indicated that PM₁₀ monitoring data was available from the SP Milling project at Sycamore Ranch, located approximately 1.7 miles southeast of Toland Road Landfill. The PM₁₀ monitoring stations at Sycamore Ranch are located at an elevation of approximately 500 feet, which is approximately 500 feet lower than the southwest corner of the landfill footprint. The lateral and vertical proximity (1.7 miles and 500 feet, respectively) of these monitoring stations to the landfill assure reasonable representativeness for the PM₁₀ monitoring data.
4. An evaluation of the Sycamore Ranch data provided by APCD indicates that the arithmetic mean PM₁₀ concentration during the period of October 1994 through August 1995 was 15.1 µg/m³, which is 52 percent of the 1994 annual arithmetic mean of 29.1 µg/m³ at Piru. The comment's observations regarding the proximity of the Piru monitoring station to the dry bed of the Santa Clara River may partly explain why the PM₁₀ concentration measured at the Piru station in 1994 (29.1 µg/m³) is almost twice that measured at Sycamore Ranch.
5. Combining the Sycamore Ranch PM₁₀ concentration data with the model data, the range of potential PM₁₀ concentrations in nearby orchards (i.e., up to 0.68µg/m³) that could be generated by the proposed project represents only 4.5 percent of the baseline concentration of PM₁₀ in these orchards.
6. Although no two landfills are identical, the observations of no adverse impacts on agriculture at Spadra and Highgrove landfills support the discussion of PM₁₀ concentration at Toland, which concludes that the proposed expansion will not adversely impact the health and

productivity of orchard trees and other plants in the vicinity. According to Barnes (1993), vehicular travel on dirt roads within agricultural areas may emit sufficient fugitive dust to adversely impact plants.

7. A special survey of potential impacts of fugitive PM₁₀ on agricultural plants around Bailard was not accomplished because of the following reasons:
 - The potential impact at Bailard was expected to be as small as at Toland.
 - Travel on dirt roads in agricultural areas around Bailard, Toland or other landfills are believed to be far more important contributors of fugitive PM₁₀.
 - It would be difficult to implement a field survey capable of discriminating different source contributions to PM₁₀ depositing (settling) on agricultural plants.

Response 61-56

1. Section 3.14.5 of the Draft EIR included operational procedures and regulatory requirements that would minimize the potential effects of litter associated with the proposed project, including the effects of wind-born waste and litter carried offsite. In accordance with CCR Title 14, the following measures shall be implemented at the landfill to control litter:
 - Waste shall be compacted at the working face of the landfill.
 - Periodic application of daily cover or alternative cover during the day and at the end of the working day.
 - During periods of high winds, more frequent application of cover material.
 - Maintain the working face at as small an area as safely practicable given the type of and number of landfill equipment operating at the working face.
 - 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.
2. In response to this and other comments, the following additional mitigation measures have been included in the EIR to better define the litter control program:
 - Litter control crews shall inspect the landfill fences (permanent and portable fences) on a weekly basis and remove litter.
 - During periods of high winds, litter control crews shall be dispatched at least twice a week, or more frequently if required, to inspect the landfill fences (permanent and portable fences) and remove litter.
 - 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.

3. As discussed in Section 3.14 of the Draft EIR, VRSD would take appropriate steps if there is a recurring situation regarding inadequate covering of waste loads by a particular hauler. In response to this and other comments, a mitigation measure has been included in the EIR to clarify these actions, that may include reporting the waste hauler to the LEA (which oversees inspection and tagging procedures for commercial vehicles) and/or the County Sheriff's Department and California Highway Patrol (which enforce the California Vehicle Code). Violation of the California Vehicle Code is punishable by fines and/or jail. This additional mitigation measure and those stated above, would assure that the potential impacts of litter from the proposed project remain below a level of significance.
4. The inclusion of these additional mitigation measures in this Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project. Also see Table A.1 of Appendix A of this Final EIR for a combined listing of the operational procedures and regulatory requirements, and mitigation measures including those noted above for litter control.
5. The majority of the 1,500 tpd of waste that would be transported to Toland as part of the proposed project would be hauled by commercial waste disposal companies. These companies have not been a source of illegal dumping in the County. When illegal dumping occurs, it can normally be associated with private parties that either do not want to pay the tipping fee or who find a landfill closed when they arrive. As discussed in Section 3.14.3.1.3 of the Draft EIR, it is recognized that illegal dumping would remain a concern, although, it is expected to diminish under the proposed project. This conclusion was based on the additional days the landfill would be open per week and the greater daily capacity. The proposed schedule and daily capacity is expected to provide sufficient opportunity for private parties to utilize the landfill, therefore, reducing the potential for illegal dumping.
6. Based on VRSD records, there are very few incidents of illegal dumping in the vicinity of Bailard (Haden, 1995). VRSD currently cleans up incidents of illegal dumping within the area of the landfill as part of a "good neighbor" policy. If the owner of the illegally dumped material can be identified, VRSD reports the person or persons to the County Environmental Health Division. In the event that hazardous waste is illegally dumped, VRSD implements one of the following procedures:
 - If the amount of material is small and mainly consists of household hazardous waste, VRSD picks up the material and sets it aside for collection by a licensed hauler for transport to an appropriately permitted facility.

- Material other than small amounts of household hazardous waste reported in the vicinity of the site is reported to the County Environmental Health Division.

These procedures would continue under the proposed project. It is unclear as to what is referred to in the comment by "the current rate of vandalism, related to illegal dumping around Bailard Landfill."

7. The "specific onsite and offsite efforts by VRSD" to reduce illegal dumping were included in Section 3.14.5 of the Draft EIR and include the following:
 - 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.
 - At the time of landfill closure, signs would be posted at the landfill entrance and scalehouse indicating the date of closure and alternative permitted landfills available to accept waste. 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.

Response 61-57

1. See Response 61-56 above.

Response 61-58

1. If detailed hydrogeologic investigations determined that a new well to supply the proposed project could affect adjacent wells, VRSD would evaluate its options. As one or a combination of the three sources of ground water identified in Section 3.3 of the Draft EIR would be able to support the proposed project, VRSD has sufficient options to provide water to the site without affecting ground water supplies in the area.

Response 61-59

1. As discussed in Section 3.10.3.3 of the Draft EIR, the noise study conducted for the proposed project did consider the grade of Toland Road. Noise measurements of waste trucks were taken along a steep portion of Toland Road (approximately 8 percent grade) to determine the potential impact of truck noise on surrounding sensitive uses (MGA, 1995).

2. Vehicle emissions estimates in Section 3.12 of the Draft EIR are based on the most recent version (EMFAC7F1.1) of CARB's emission factor computer model, which takes into account standardized test cycles and nonstandard conditions. Inputs used in the model include type of vehicle, fuel, speed, control technology (e.g., catalytic), ambient temperature, and year (up to 2020 is available). These emission factors, the most detailed available, were selected for purposes of the Draft EIR for heavy-duty diesel trucks traveling at 25 mph on Toland Road.
3. CARB confirms that specific emission factors have not been developed to simulate trucks ascending grades (CARB, 1995), therefore, increased emissions associated with trucks ascending Toland Road are considered to be included in the standard emission factors from CARB. The potential significance of these emissions and resulting ambient concentrations is interpreted by reference to state and federal ambient air quality standard. These standards were developed to protect human health with an adequate margin of safety, and are concentrations averaged over time periods that vary from one hour to one year. These averaging times remove much of the detailed variability that exists in emission sources, especially in mobile sources with engine loading that varies continuously based on factors such as accelerator position and road grade.
4. Further context for the appropriateness of using standard emission factors comes from the observation that vehicular air emissions in the vicinity of Toland are influenced far more by nonproject-related traffic volumes on Highway 126 than from project-related traffic volumes. As noted in Section 3.11.4 of the Draft EIR, 1.2 to 2.3 percent (i.e., the "proposed case" and "worse case," respectively, as defined by the Draft EIR) of the 37,600 vehicles per day that are estimated to use Highway 126 in 2015 (furthest projection available from Caltrans) would be associated with the proposed project. The other 36,735 to 37,150 vehicles will emit 97 to 98 percent of the total mobile source emissions associated with traffic on Highway 126.
5. The traffic study for the proposed project estimated that the average wait to make a left turn from State Route 126 (eastbound) onto Toland Road is approximately 19 seconds during the peak morning hour and 14 seconds during the peak evening hour.

Response 61-60

1. As discussed in Section 3.11.3.1.2 of the Draft EIR, the length of the left turn pocket at the Toland Road/Highway 126 intersection is approximately 120 feet. The turn pocket exceeds

the minimum length required pursuant to the Caltrans Highway Design Manual (Caltrans, 1995). The Caltrans design standard for left-turn vehicle storage is based on the number of turning vehicles likely to arrive in an average two minute period during the peak hour (Caltrans, 1995). If the number of trucks during the peak hour represent 10 percent or more of the traffic volume, left-turn vehicle storage space for a minimum of one passenger car and one truck should be provided. As shown in Table 3.11.2, trucks average approximately 11.5 percent of the traffic at the Toland Road/Highway 126 intersection. Based on the peak hour estimate for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The design standard for the left-turn vehicle storage length would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car).

2. Under the "proposed case" and the use of transfer trucks, during the peak hour a waste truck would arrive at the intersection an average of once every 10 minutes. Based on the longer truck length for transfer vehicles, the required left-turn storage length for the "proposed case" would be 85 feet (60 feet per transfer truck and 25 feet for the passenger car). Based on the Caltrans design standard, therefore, depending on whether packer trucks or transfer trucks are used, the required left-turn pocket length at the intersection of Toland Road and Highway 126 would range between 65 feet and 85 feet. The existing 120-foot left-turn pocket and configuration at this intersection and approach lanes, as shown in Figure 3.11.3 of the Draft EIR, provides waste trucks and other vehicles adequate distance to safely approach the intersection.
3. This comment's concern regarding the grade of Toland Road and the risks of vehicle brake failure are addressed in Section 3.11.3.1.3 of the Draft EIR. As concluded in this section of the Draft EIR, from the data provided by Caltrans, it is clear that a truck escape ramp is not warranted on Toland Road.
4. As discussed in Section 3.11.7 of the Draft EIR, the Toland Road/Highway 126 intersection is within the jurisdiction of Caltrans. Based on Caltrans' review of the traffic study for the proposed project, it recommended traffic safety improvements to mitigate potential project impacts (see Comment Letter 02). The traffic safety improvements recommended by Caltrans include the installation of an intersection control flashing beacon at Toland Road/Highway 126, standard intersection lighting, and appropriate signage along Highway 126. See Table 1.1 of this Final EIR for the complete list of traffic mitigation measures.

5. Neither Caltrans or the County Transportation Department identify hazardous conditions at the Toland Road/Highway 126 intersection. In addition, these agencies have concurred with the traffic study's conclusion that signal warrants at this intersection would not be met by the proposed project (see Comment Letters 02 and 13). Moreover, as discussed in Section 3.11.3.1.3 of the Draft EIR, the accident rate along Highway 126 in the vicinity of Toland Road is substantially lower than the statewide average. The flashing beacon and warning signs, as recommended by Caltrans and included in the EIR as mitigation measures, would mitigate potential traffic-related safety issues at the intersection.

Reference 61-61

1. As discussed in Section 3.8.3.2.2 of the Draft EIR, the combined Timber Canyon and O'Leary Creek airsheds contain the volume of air that could possibly be impacted by the proposed project. The analysis in the Draft EIR considered the maximum geographical extent for possible frost effects.
2. The discussion of frost in the Draft EIR agrees with the comment about the importance of movement of air to frost formation (see paragraphs 6 and 7 on page 3.8-33 of the Draft EIR) that results from micrometeorological differences in complex terrain and the existence of topographical "frost pockets." As discussed in the Draft EIR, the incidence of frost in a pocket will not be affected by a change in the topography from the proposed project which is calculated to represent a 0.5 percent reduction in the air volume of the combined Timber Canyon and O'Leary Creek airshed. The proposed project would change the ground height in the landfill within the side canyon, where no agriculture exists, but would not block nor divert down canyon/down valley air flow where agriculture does exist. The evolving landfill simply moves the side canyon walls, where the air drainage begins, forward towards the canyon mouth.
3. As discussed in Section 3.8.3.2.2 of the Draft EIR, filling the side canyon would not change the airflow in the main canyon by more than a 0.5 percent ratio in air volumes. This 0.5 percent maximum possible effect on airflow is judged to be insignificant compared to the much larger variability in the meteorological and topographical variables that affect frost formation. While the proposed project would move the position of the side canyon wall forward to the face of the waste prism, air will still cool after sunset and will drain down the face, regardless of its position. Airflow from the new face of the proposed project would not be significantly different than the existing airflow from the side canyon and, therefore, no significant change would occur in the airflow at the location of orchards and other agricultural land in the main canyon.

4. As discussed in Section 3.8.3.2.2 of the Draft EIR and in this response, it has been shown that a land feature the size of the proposed project would not alter frost damage patterns where they matter, which is at the location of the orchards, not in the side canyon. In addition, as can be seen in Figures 3.8.1 and 3.8.4 of the Draft EIR, the orchards in Timber Canyon are a minimum of 2,000 feet west of the entrance to the side canyon containing Toland, a distance sufficient to dampen the small effect of the volume change in the side canyon on micrometeorology in the main canyon orchards.

Response 61-62

1. Section 3.12.3 of the Draft EIR provides the discussion of air emissions from the proposed project and the modeling of ambient air concentrations caused by these emissions. Table 3.12.10 of the Draft EIR shows that the peak concentration caused by the proposed project plus the background concentration would not exceed state or federal national ambient air quality standards. The ambient air quality standards have been established by the state and federal government at concentrations that protect human health from known effects, and include an adequate margin of safety.
2. Section 3.13 of the Draft EIR provides an additional discussion regarding the health risks of the proposed project's air emissions including criteria pollutants and toxic air contaminants. As can be seen in Table 3.13.2 of the Draft EIR, carcinogenic and non-carcinogenic (chronic and acute health hazards) health risks from the proposed project are orders of magnitude lower than significance thresholds. Thus, even the more susceptible individuals, including senior citizens and young children, would not be subjected to significant health effects from the proposed project.

Response 61-63

1. The proposed project consists of both a vertical and lateral expansion of Toland. The vertical expansion component of the proposed project includes the placement of additional waste on top of waste already landfilled at the site. Vertical expansions of existing landfills are allowed by state and federal landfill regulations (i.e., CCR Titles 14 and 23, and Subtitle D) without a requirement to excavate previously landfilled waste to allow the installation of a composite liner system. Lateral expansions of existing landfills are required by state and federal

regulations to include a composite liner system. Therefore, based on state and federal landfill regulations, the proposed project includes a composite liner for the lateral expansion component of the project.

2. As discussed in Section 2.5.1 of the Draft EIR, for the phases of the proposed project that involve a vertical expansion on top of waste already landfilled at Toland, a 1-foot thick low permeability intermediate soil barrier would be installed. Incorporated with the intermediate soil barrier is a landfill gas collection system, and leachate collection and removal system. The design of the intermediate soil barrier system shall take into account the overburden weight of the new waste and shall account for any settlement that may occur.
3. The intermediate soil barrier to isolate the existing waste from the new waste is not required by state or federal landfill regulations for vertical expansions, however, it has been included in the proposed project as a component of the landfill liner system. Similar system components have previously been approved by regulatory agencies and are currently being used effectively at other landfills, including Bailard.
4. In addition, as discussed in Section 3.3 of the Draft EIR, based on the geologic and hydrogeologic conditions at Toland, and the landfill regulatory requirements included in CCR Titles 14 and 23, and Subtitle D (e.g., composite liner system, landfill gas collection system, leachate collection and removal system, etc.) the proposed project would not impact ground water quality.

Response 61-64

1. The closure of Bailard is due to the landfill reaching its permitted tonnage limits in the summer of 1996. In accordance with the revised CUP issued by the County, Bailard is allowed to operate until it either reaches its tonnage limit, its permitted contour elevations, or May 1997, whichever occurs first. In accordance with CCR Titles 14 and 23, Bailard must be operated in manner to assure that it does not impact surrounding land uses or result in nuisance offsite.
2. In approving the revised CUP for the permit time extension of Bailard in 1994, the County Planning Commission and Board of Supervisors determined that adequate conditions and permit requirements were available to assure that Bailard would operate in a safe manner and that the landfill was compatible with surrounding land uses. If the County could not make this finding, the permit time extension for Bailard could not have been approved.

3. The proposed project at Toland would be required to meet the same standards included in CCR Titles 14 and 23 as Bailard, and must be found by the County Planning Commission and Board of Supervisors to be compatible with surrounding land uses before a revised CUP can be approved.

Response 61-65

1. The alternatives analysis in Chapter 4.0 of the Draft EIR is comprehensive, objective, and meaningful. The Draft EIR evaluated the following 32 alternatives:

<u>Alternative</u>	<u>Number Evaluated</u>
In-County landfills (waste transport by truck)	1
Out-of-County (waste transport by truck)	4
Rail-haul alternatives	4
Offsite alternative location (within County)	20 ⁽¹⁾
Resource Recovery	1
Reduced Recovery	1
No Project	1
TOTAL	32

(1) Comparative impact analysis of top 20 sites identified in previous siting studies (VRSD Siting Study, CoSWMP, and Weldon Canyon EIR).

2. The potential for surrounding landfills to accommodate waste proposed to be disposed at Toland under the proposed project is discussed in the respective sections within Chapter 4.0 of the Draft EIR. The need for landfill capacity in both the short-term and long-term is documented in the EIR. This finding is confirmed by a recent CIWMB report which lists Ventura County as one of twenty-one counties statewide which has less than 15 years remaining disposal capacity (CIWMB, 1995). In addition, as discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion program implemented under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County has only nine years of remaining landfill capacity (County, 1995a).

Response 61-66

1. As discussed in Section 1.1.1 of the Draft EIR, in addition to the 161 acres owned by VRSD on which Toland is located, VRSD also owns 53 acres that adjoins the landfill to the south. This 53 acres is included in the proposed project and would be the location of the operations

and maintenance center, scalehouse and detention basin. VRSD does not own any other land in the vicinity of Toland, and has no plans to expand Toland beyond what is included in the proposed project.

Response 61-67

1. As discussed in Section 3.8.6 of the Draft EIR, the proposed project would be consistent with existing applicable plans and policies of the County General Plans. As the proposed project is a continuance of a current land use, no loss in property values is expected.

Response 61-68

1. As discussed in Section 3.1.2 of the Draft EIR, the evaluation of impacts in the Draft EIR were based on foreseeable effects from the proposed project on the existing environment. The analysis was formulated on the basis of available information, using reasonable projections of the potential impacts associated with the proposed project. For purposes of CEQA, an environmental impact is defined as a change in the status of physical conditions that would be affected by the proposed project.
2. The significance of potential impacts was assessed in the topical sections of Chapter 3.0 of the Draft EIR based on criteria established for each environmental topic. Appendix G of the CEQA Guidelines and the County's Initial Study Assessment Guidelines provide guidance on impacts that would normally be significant. Considerations of significance were based on the nature of the change to the existing environment and a determination of what would constitute a substantial detrimental effect, and included:
 - Resource sensitivity or the probable response of a particular resource to project-related activities.
 - Resource quality or the present condition of the resource potentially affected.
 - Resource quantity or the amount of the resource potentially affected.
 - Duration of the impact, or the period of time over which the resource would be affected, stated as short-term (up to a few years) or long-term (beyond the operational life of the project).

3. Mitigation measures are identified in Chapter 3.0 of the Draft EIR for each significant environmental impact. Methods available to mitigate potential environmental impacts generally include:

- Avoiding the impact altogether by not taking a certain action or part of an action.
- Minimizing impacts by limiting the degree or magnitude of an action.
- Rectifying the impact by repairing, rehabilitating, or reclaiming the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance.
- Compensating for the impact by replacing or providing substitute resources or environments.

Response 61-69

1. The Draft EIR was prepared by an independent third party under contract to VRSD, that has no interest in the future outcome of the project.
2. As discussed in Section 3.1.2 of the Draft EIR, the significance of potential impacts was assessed based upon criteria established for each environmental topic. Appendix G of the CEQA Guidelines and the County's Initial Study Assessment Guidelines (1992a) provided guidance on effects that would normally be significant. Considerations of significance were based upon changes to the existing environment and a determination of what would constitute a substantial detrimental effect.

Response 61-70

1. This Final EIR is distributed for a 10-day notification period before the VRSD Board of Directors can hold a hearing to consider certification of the EIR. Input on the EIR can be submitted during this time and would be part of the public record, and would be considered by the VRSD Board of Directors during its certification hearing for the EIR. In addition, before the proposed project can be implemented, it will require a revised CUP from the County. In the event that members of the public do not agree with the VRSD Board's decision regarding the proposed project, they may make their concerns known during the County Planning Commission and Board of Supervisors hearings on the CUP.

Response 61-71

1. It is unclear as to what the comment refers to with regard to "...reports from other landfills around the state and Ventura County." Without providing specific references to these "reports" it is not possible to prepare a response to this comment.

Response 61-72

1. As discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion programs implemented by the County and its cities under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County only has nine years of remaining landfill capacity (County, 1995a). Since the County cannot demonstrate 15 years of landfill capacity as required by AB 939, VRSD proposes to expand Toland to meet a portion of the long-term landfill capacity requirements for the County. The proposed project would provide for the environmentally safe disposal of the remaining 50 percent of the waste stream after the County and its cities meet the requirements of AB 939 to reduce the volume of solid waste requiring disposal by 25 and 50 percent by 1995 and 2000, respectively.
2. Chapter 4.0 of the Draft EIR included a detailed analysis of alternatives to the proposed project, including increased recycling and waste-to-energy. As discussed in Chapter 4.0 of the Draft EIR, none of these alternatives would eliminate or reduce significant impacts associated with the proposed project at Toland. In fact, as noted in Chapter 4.0, these alternatives would have similar or greater environmental impacts than the proposed project.

Response 61-73

1. As discussed in Section 3.3.8 of the Draft EIR, the mitigation measures included in the EIR regarding the quantity of water that would be used by the proposed project (see the revised mitigation measure in Table 1.1 of this Final EIR) would offset the project's incremental contribution to the cumulative overdraft of the Oxnard Plain. By offsetting the impact, the proposed project's use of water would be below a level of significance. Therefore, as stated in Section 3.3.8 of the Draft EIR, the proposed project would not result in significant unavoidable adverse impacts related to water quantity.

Response 61-74

1. The determination that there would be no significant impacts from the proposed project with regard to visual characteristics was based on the minimal amount of newly disturbed acreage associated with the proposed project, in addition to the project being a continuation of current landfilling activities. The increase in the height of the landfill, was also considered. As demonstrated in Figures 3.9.3 through 3.9.5 of the Draft EIR, the proposed project would not extensively alter the natural appearance of the area. Therefore, impacts with regard to visual characteristics are not considered significant.

Response 61-75

1. The visual impacts of a noise barrier for the two residences was not considered significant based on the significance thresholds as defined in the visual resource section of the Draft EIR (see Section 3.9.3). As noted in the Draft EIR, the noise barriers would be constructed to blend with the rural character of the area, such as a country style wood barrier, and could be screened with landscaping. Based on the defined visual impact thresholds, the barriers would not result in "a substantial, demonstrable negative aesthetic effect," or "significantly alter or obscure public views."
3. See Response 61-79 below for a discussion of noise mitigation measures for construction activities between the hours of 7:00 a.m. and 7:00 p.m.

Response 61-76

1. As discussed in Section 3.10.6 of the Draft EIR, the existing and future nonproject traffic-related cumulative noise conditions along Highway 126 in the project vicinity constitute a significant impact. The Draft EIR also discussed, however, that the project-related traffic volume would result in only an incremental increase to noise levels at the Santa Clara School when compared to the existing and future nonproject traffic-related cumulative noise levels. Based on this finding, Section 3.10.8 of the Draft EIR specifies that a statement of overriding considerations for the cumulative nonproject traffic-related noise impact will be required.
2. As discussed in Section 3.10.4 of the Draft EIR, the proposed project's contribution to the traffic-related cumulative noise impacts would be a maximum increase of 0.6 dBA under the "worse case" traffic scenario for 2015. Moreover, the noise impact due to nonproject-related cumulative traffic on Highway 126 extends beyond the vicinity of Toland Road. Noise

conditions along Highway 126 represent a regional issue and are not the responsibility of VRSD. Mitigation measures for the nonproject-related cumulative noise impacts were, therefore, not proposed as part of the proposed project.

Response 61-77

1. As discussed in Section 3.11.7 of the Draft EIR, the Toland Road/Highway 126 intersection is within the jurisdiction of Caltrans. Based on Caltrans' review of the traffic study for the proposed project, it recommended traffic safety improvements to mitigate potential project impacts (see Comment Letter 02). The traffic safety improvements recommended by Caltrans include the installation of an intersection control flashing beacon at Toland Road/Highway 126, standard intersection lighting, and appropriate signage along Highway 126. See Table 1.1 of this Final EIR for the complete list of traffic mitigation measures.
2. Neither Caltrans or the County Transportation Department identify hazardous conditions at the Toland Road/Highway 126 intersection. In addition, these agencies have concurred with the traffic study's conclusion that signal warrants at this intersection would not be met by the proposed project (see Comment Letters 02 and 13). Moreover, as discussed in Section 3.11.3.1.3 of the Draft EIR, the accident rate along Highway 126 in the vicinity of Toland Road is substantially lower than the statewide average. The flashing beacon and warning signs, as recommended by Caltrans and included in the EIR as mitigation measures, would mitigate potential traffic-related safety issues at the intersection.
3. Notwithstanding Caltrans' determination that a signal is not required at the intersection of Toland Road and Highway 126, in the event at some time in the future Caltrans decides a signal is required, VRSD has agreed to pay the cost for the signal. While this is not a mitigation measure in terms of CEQA, VRSD would accept a condition to this effect in the CUP for the proposed project.
4. As discussed in Section 3.11.3.1.2 of the Draft EIR, the existing 120-foot, left-turn pocket for eastbound traffic on Highway 126 at Toland Road exceeds the minimum length required pursuant to the Caltrans Highway Design Manual (Caltrans, 1995). The Caltrans design standard for left-turn vehicle storage is based on the number of turning vehicles likely to arrive in an average two minute period during the peak hour (Caltrans, 1995). If the number of trucks during the peak hour represent 10 percent or more of the traffic volume, left-turn vehicle storage space for a minimum of one passenger car and one truck should be provided.

As shown in Table 3.11.2, trucks average approximately 11.5 percent of the traffic at the Toland Road/Highway 126 intersection. Based on the peak hour estimate for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The design standard for the left-turn vehicle storage length would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car).

5. Under the "proposed case" and the use of transfer trucks, during the peak hour a waste truck would arrive at the intersection an average of once every 10 minutes. Based on the longer truck length for transfer vehicles, the required left-turn storage length for the "proposed case" would be 85 feet (60 feet per transfer truck and 25 feet for the passenger car). Based on the Caltrans design standard, therefore, depending on whether packer trucks or transfer trucks are used, the required left-turn pocket length at the intersection of Toland Road and Highway 126 would range between 65 feet and 85 feet. The existing 120-foot left-turn pocket and configuration at this intersection and approach lanes, as shown in Figure 3.11.3 of the Draft EIR, provides waste trucks and other vehicles adequate distance to safely approach the intersection.

Response 61-78

1. As discussed in Section 3.12.3.2 of the Draft EIR, the County's 1994 AQMP includes a baseline air emissions inventory categories for "Solid Waste Landfill" and "Landfill Gas Combustion." The AQMP also includes baseline air emissions inventory categories for various mobile sources including the transport of materials, which would include the transport of solid waste to landfills. Therefore, air emissions associated with landfill operations in the County are not classified as surplus or optional, but rather are considered to be part of the County's baseline emissions inventory and are taken into account in the AQMP in terms of the strategy for meeting state and federal clean air standards.
2. As discussed in the Draft EIR, air emissions associated with the proposed project would be accompanied by corresponding emissions reductions at Bailard as landfilling operations shift to Toland. Shifting landfilling operations from Bailard to Toland reflects a realignment of waste disposal within the County, and does not represent an increase over the baseline emissions inventory for the County. Therefore, on a County-wide basis, air emissions associated with the proposed landfill operations and onsite equipment at Toland would not represent a significant emissions impact.

3. Notwithstanding that the proposed project represents a shift of air emissions associated with solid waste disposal activities on a County-wide basis, as discussed in Section 3.12.3.2.1 of the Draft EIR, the proposed landfill operations and onsite equipment at Toland were analyzed to determine if the proposed project would result in the exceedance of state or federal ambient air quality standards at or beyond the project boundary. As documented in the Draft EIR, the proposed project would not result in state or federal ambient air quality standards being exceeded at or beyond the project boundary. Therefore, based on the significance thresholds developed by APCD, the air quality impacts associated with the onsite operations under the proposed project would be below a level of significance both on a County-wide and local basis.
4. This comment is correct in noting that offsite mobile air emissions resulting from the additional vehicle miles traveled to Toland versus Bailard to transport 1,500 tons of waste per day, would result in a significant air quality impact on a County-wide basis. As discussed in the Draft EIR, however, the offsite mobile air emissions associated with the proposed project at Toland would be less than transporting 1,500 tons of waste per day to the Simi Valley or Chiquita Canyon landfills.

Response 61-79

1. Section 3.10 of the Draft EIR includes an analysis of the noise impacts associated with construction (Section 3.10.3.1 of the Draft EIR) and landfill operations (Section 3.10.3.2 of the Draft EIR). As discussed in the Draft EIR, noise levels from onsite landfill operations would not exceed the County's General Plan standards of 55 dBA at the residences in the vicinity of the landfill, therefore, no mitigation measures are required for the onsite operations that would occur between 6:00 a.m. and 6:00 p.m.
2. The mitigation measure included in Section 3.10.7 and Table 1.1 of the Draft EIR to limit construction activities to between 7:00 a.m. and 7:00 p.m. relates to temporary construction activities associated with the operations and maintenance center, scalehouse and detention basin during the initial phase of the proposed project. This mitigation measure was deemed appropriate based on the location of these facilities in relationship to the residences in the vicinity of the landfill.

Response 61-80

1. See Response 61-77 above. The specific issues regarding the grade of Toland Road and the potential traffic safety concerns related to Santa Clara School are addressed in Section 3.11.3.1.3 of the Draft EIR.

Response 61-81

1. It is noted that the Fillmore Fire Department is a Volunteer Fire Department. The status of the Fillmore Fire Department does not alter the findings or conclusions of the EIR.

Response 61-82

1. As noted in this comment, Section 3.8.3.1.5 of the Draft EIR acknowledges that some variation in the Toland ranking in comparison to the original site rankings is unavoidable due to individual judgments of the individuals ranking the sites. This section of the Draft EIR also notes that "...accurate rankings were facilitated by the fact that the majority of the VRSD study criteria are specific and quantifiable, and by the level of study conducted for this EIR." As recommended by this comment, therefore, the analysis is primarily based on "scientific evidence or hard facts." Since the majority of the ranking criteria is objective in nature, the overall ranking was determined to be useful and meaningful. The ranking system, in its entirety from the VRSD Study, is included as Appendix E of the Draft EIR.
2. An overview of each of the VRSD Study sites, including the top ranking sites specified in this comment, is included in Section 4.5.3 and Table 4.4 of the Draft EIR. Although it is correct that Toland ranked lower (5th out of 35 sites) than three sites in close proximity to the Weldon Canyon site, two of these sites were determined to have "fatal flaws" for development of a landfill (County, 1992). As discussed in Section 4.5.3 of the Draft EIR, the three sites in close proximity to Weldon Canyon were determined not to reduce or eliminate significant impacts relative to the proposed project.

Response 61-83

1. Based on the volume of stormwater that could flow from the site during the 100-year, 24-hour storm event, the detention basin would be approximately 250 feet by 150 feet and 10 feet deep. The maximum water release rate from the detention basin would be equal to the current stormwater discharge rate from the site for the 100-year, 24-hour storm event. Based on the

preliminary hydrology calculations in Appendix C of the Draft EIR, the current stormwater discharge rate from the site is estimated to be 337 cubic feet per second (cfs). The detained stormwater would be released from the basin via a pipe sized to limit the outflow to a maximum of 337 cfs. As the release of water from the detention basin would be through a pipe sized to a maximum of 337 cfs, there would be no requirement to monitor the outflow volume. The detention time in the basin provides the mechanism through which the sediment in the water settles to the bottom of the basin. Collected sediments would be removed routinely as part of regular maintenance activities at the landfill.

Response 61-84

1. As discussed in Section 4.5.3.3.1 of the Draft EIR, landfill development at Weldon Canyon would result in additional significant impacts as compared to the proposed project at Toland. Unlike Toland, for which only waste transport related emissions would be significant, the air quality impacts associated with both waste transport emissions and landfill operation-related emissions were determined to be significant for Weldon. Air quality modeling and analyses are necessarily site specific incorporating such factors as receptor distance, wind direction and topography, and wind velocity in regards to several different pollutant types. It is beyond the scope of this EIR to provide a detailed analysis of air quality impacts associated with each of the 20 offsite alternative locations considered.

Response 61-85

1. Toland does not currently attract birds and is not used as a loafing area by gulls. It is speculative as to whether gulls or other bird species would be attracted to Toland due to the proposed project. Similarly, it is speculative as to whether gulls would come in conflict with the Santa Paula Airport. Issues that are speculative cannot be evaluated, therefore, the possibility that Toland may attract gulls or other bird species and the potential that gulls could come in conflict with the Santa Paula Airport is not addressed in the EIR. Toland would be operated in compliance with CCR Title 14, including the following operational procedures (see Section 3.14.5 of the Draft EIR) that are known to be effective in minimizing birds at landfills:
 - Compaction of waste at the active working face.
 - Periodic 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.

- The working face would be kept as small as safely practicable, given the type of and number of landfill equipment working there.
 - An active litter control program.
2. As discussed in Section 3.14.3.1.1 of the Draft EIR, in the event birds are determined to be a nuisance at Toland additional measures would be implemented and may include, but not be limited to, the use of an overhead nylon line grid system (bird wires), distress tapes, propane cannons, and/or habitat manipulation/modification. The effectiveness of these measures would be monitored and, if found not to be effective, additional measures would be developed. To formalize this requirement, a mitigation measure has been included in this Final EIR regarding the use of additional measures in the event birds are determined to be a nuisance at Toland. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

Response 61-86

1. As discussed in Section 3.13.2.2 of the Draft EIR, the concept of the maximum exposed individual (MEI) in health risk analyses is to quantify the health risk to a hypothetical person who is considered to be simultaneously exposed to the potentially emitted toxic constituents at their maximum concentrations for 24 hours per day, 365 days per year, over an entire 70-year lifetime. Modeling the MEI's exposure allows a conservative assessment of maximum risk to which the public could be theoretically exposed. The MEI significantly overestimates the risk to a specific individual and is therefore protective of public health.
2. As shown on Figure 3.13.1 of the Draft EIR, the theoretical MEI for the proposed project would be located immediately on the property boundary. As indicated on Revised Table 3.13.2 (see Section 3.2 of this Final EIR), at the MEI, the carcinogenic health risk is 6.6 in a million, as compared to the significance threshold of 10 in a million. Revised Table 3.13.2 also shows the health risk for residences, sensitive land uses and offsite working populations in the vicinity of Toland, and the Santa Clara School and Toland Park. As shown in the table, the carcinogenic health risks at these locations are significantly less than the significance threshold of 10 in a million (e.g., 1 in a million for residences). The health risks at these offsite locations, while still conservative, are more representative of the health risks from the proposed project than is the MEI.

Response 61-87

1. Appropriately, the Draft EIR evaluates different geographical areas for various environmental impacts. For example, the noise analysis considers the residences within a specific noise contour which could be impacted by the proposed project (for both onsite and offsite noise impacts), whereas the land use compatibility section addresses potential impacts to residences within a larger geographical area. As noted in Table 3.8.1, based on a review of a 1994 aerial photograph of the project site and vicinity, there are fewer than 10 residences within one mile of the landfill. This was based on a conservative interpretation of which structures are residences and which are auxiliary agricultural buildings.
2. This commenter does not provide the geographic area (i.e., distance from the landfill) in which the additional residences are located. Therefore, it is not possible to compare the accuracy of the comment's information with the data provided in the Draft EIR.

Response 61-88

1. Section 3.12.3 of the Draft EIR provides the discussion of air emissions from the proposed project and the modeling of ambient air concentrations caused by these emissions. Table 3.12.10 of the Draft EIR shows that the peak concentration caused by the proposed project plus the background concentration would not exceed state or federal national ambient air quality standards. The ambient air quality standards have been established by the state and federal government at concentrations that protect human health from known effects, and include an adequate margin of safety.
2. Section 3.13 of the Draft EIR provides an additional discussion regarding the health risks of the proposed project's air emissions including criteria pollutants and toxic air contaminants. As can be seen in Table 3.13.2 of the Draft EIR, carcinogenic and non-carcinogenic (chronic and acute health hazards) health risks from the proposed project are orders of magnitude lower than significance thresholds. Thus, even the more susceptible individuals, including senior citizens and young children, would not be subjected to significant health effects from the proposed project.

Response 61-89

1. As discussed in Section 3.11.3.1.2 of the Draft EIR, the length of the left turn pocket at the Toland Road/Highway 126 intersection is approximately 120 feet. The turn pocket exceeds

the minimum length required pursuant to the Caltrans Highway Design Manual (Caltrans, 1995). The Caltrans design standard for left-turn vehicle storage is based on the number of turning vehicles likely to arrive in an average two minute period during the peak hour (Caltrans, 1995). If the number of trucks during the peak hour represent 10 percent or more of the traffic volume, left-turn vehicle storage space for a minimum of one passenger car and one truck should be provided. As shown in Table 3.11.2, trucks average approximately 11.5 percent of the traffic at the Toland Road/Highway 126 intersection. Based on the peak hour estimate for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The design standard for the left-turn vehicle storage length would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car).

2. Under the "proposed case" and the use of transfer trucks, during the peak hour a waste truck would arrive at the intersection an average of once every 10 minutes. Based on the longer truck length for transfer vehicles, the required left-turn storage length for the "proposed case" would be 85 feet (60 feet per transfer truck and 25 feet for the passenger car). Based on the Caltrans design standard, therefore, depending on whether packer trucks or transfer trucks are used, the required left-turn pocket length at the intersection of Toland Road and Highway 126 would range between 65 feet and 85 feet. The existing 120-foot left-turn pocket and configuration at this intersection and approach lanes, as shown in Figure 3.11.3 of the Draft EIR, provides waste trucks and other vehicles adequate distance to safely approach the intersection.
3. As discussed in Section 3.11.7 of the Draft EIR, the Toland Road/Highway 126 intersection is within the jurisdiction of Caltrans. Based on Caltrans' review of the traffic study for the proposed project, it recommended traffic safety improvements to mitigate potential project impacts (see Comment Letter 02). The traffic safety improvements recommended by Caltrans include the installation of an intersection control flashing beacon at Toland Road/Highway 126, standard intersection lighting, and appropriate signage along Highway 126. See Table 1.1 of this Final EIR for the complete list of traffic mitigation measures.
4. Neither Caltrans or the County Transportation Department identify hazardous conditions at the Toland Road/Highway 126 intersection. In addition, these agencies have concurred with the traffic study's conclusion that signal warrants at this intersection would not be met by the proposed project (see Comment Letters 02 and 13). Moreover, as discussed in Section 3.11.3.1.3 of the Draft EIR, the accident rate along Highway 126 in the vicinity of

Toland Road is substantially lower than the statewide average. The flashing beacon and warning signs, as recommended by Caltrans and included in the EIR as mitigation measures, would mitigate potential traffic-related safety issues at the intersection.

5. Notwithstanding Caltrans' determination that a signal is not required at the intersection of Toland Road and Highway 126, in the event at some time in the future Caltrans decides a signal is required, VRSD has agreed to pay the cost for the signal. While this is not a mitigation measure in terms of CEQA, VRSD would accept a condition to this effect in the CUP for the proposed project.

Response 61-90

1. As discussed in Section 3.10.6 of the Draft EIR, the existing and future nonproject traffic-related cumulative noise conditions along Highway 126 in the project vicinity constitute a significant impact. The Draft EIR also discussed, however, that the project-related traffic volume would result in only an incremental increase to noise level at the Santa Clara School when compared to the existing and future nonproject traffic-related cumulative noise levels. Based on this finding, Section 3.10.8 of the Draft EIR specifies that a statement of overriding considerations for the cumulative nonproject traffic-related noise impact will be required.
2. As discussed in Section 3.10.4 of the Draft EIR, the proposed project's contribution to the traffic-related cumulative noise impact would be a maximum increase of 0.6 dBA under the "worse case" traffic scenario for 2015. In addition, the noise impact due to nonproject-related cumulative traffic on Highway 126 extends beyond the vicinity of Toland Road. Noise conditions along Highway 126 represent a regional issue and are not the responsibility of VRSD. Mitigation measures for the nonproject-related cumulative noise impacts were, therefore, not proposed as part of the proposed project.
3. The County is responsible to determine appropriate project conditions and to consider surrounding land use compatibility when making required County Zoning Ordinance findings. It is important to note, however, that County Zoning Ordinance findings are based on project specific impacts only and are not based on cumulative impacts.
4. The following County General Plan noise standard applies to the proposed project:
 - 1-hour Leq of 55 dBA, or ambient noise level plus 3 dBA (whichever is greater) during any hour between 6:00 a.m. and 7:00 p.m.

As long as the project specific noise impacts do not result in an increase in excess of 3 dBA, the project is considered to meet the County General Plan standards and a consistency finding, as required by the County Zoning Ordinance, can be made. As discussed above, the proposed project's contribution to the traffic-related cumulative noise level at the Santa Clara School would be a maximum of 0.6 dBA under the "worse case" traffic scenario for 2015. Therefore, the proposed project does not exceed the applicable County General Plan noise standard and a consistency finding can be made under the County Zoning Ordinance.

5. Mitigation of the cumulative noise impacts from the nonproject-related traffic volumes on Highway 126 could include the construction of a sound wall along portions of the highway, and/or window and/or building retrofitting of Santa Clara School. As with traffic impacts, measures to mitigate conditions within the right-of-way of Highway 126 would require review and approval by Caltrans. Proportionate (i.e., "fair share") funding of these improvements could be considered by the County for individual projects which contribute to traffic on Highway 126.
6. Relocation would risk the condition of the historical school building. Neither the school district administrators nor the teacher at the school have recommended relocation during participation in the EIR scoping and review process.

Response 61-91

1. The first part of this comment is a concern about the effect on the orchards from the traffic emissions along Highway 126. Vehicular air emissions in the vicinity of Toland are influenced far more by nonproject-related traffic volumes on Highway 126 than from project-related traffic volumes. As noted in Section 3.11.4 of the Draft EIR, 1.2 to 2.3 percent (i.e., the "proposed case" and "worse case," respectively, as defined by the Draft EIR) of the 37,600 vehicles per day that are estimated to use Highway 126 in 2015 (furthest projection available from Caltrans) would be associated with the proposed project. The other 36,735 to 37,150 vehicles will emit 97 to 98 percent of the total mobile source emissions associated with traffic on Highway 126.
2. The second part of this comment concerns truck emissions on Toland Road. Vehicle emissions estimates in Section 3.12 of the Draft EIR are based on the most recent version (EMFAC7F1.1) of CARB's emission factor computer model, which takes into account standardized test cycles and nonstandard conditions. Inputs used in the model include type of

vehicle, fuel, speed, control technology (e.g., catalytic), ambient temperature, and year (up to 2020 is available). These emission factors, the most detailed available, were selected for purposes of the Draft EIR for heavy-duty diesel trucks traveling at 25 mph on Toland Road.

3. CARB confirms that specific emission factors have not been developed to simulate trucks ascending grades (CARB, 1995), therefore, increased emissions associated with trucks ascending Toland Road are considered to be included in the standard emission factors from CARB. The potential significance of these emissions and resulting ambient concentrations is interpreted by reference to state and federal ambient air quality standard. These standards were developed to protect human health with an adequate margin of safety, and are concentrations averaged over time periods that vary from one hour to one year. These averaging times remove much of the detailed variability that exists in emission sources, especially in mobile sources with engine loading that varies continuously based on factors such as accelerator position and road grade.

Response 61-92

1. Figure 3.8.6 of the Draft EIR was reproduced directly from the February 1995 Draft Countywide Siting Element. The figure was prepared by the County to show the application of the pass/fail landfill siting criteria. It was included in the Draft EIR to generally depict the vast areas of the County that would "fail" the basic landfill site criteria included in the Draft Countywide Landfill Siting Element. At the scale the County prepared this figure it is not possible to accurately indicate the location of Toland. As noted in Section 3.8.3.1.3 of the Draft EIR, the EIR did not rely upon the figure to determine that Toland was located in the "white" area of the County, rather it was determined by the County, as documented in the Draft Countywide Landfill Siting Element, that Toland was in an area that "passed" the County's basic landfill siting criteria.
2. Based on the scale of Figure 3.8.6 of the Draft EIR, the purpose for including the figure in the Draft EIR, and the fact that the text of the Draft Countywide Landfill Siting Element indicated that Toland "passed" the basic landfill siting criteria, it is not appropriate to attempt to locate Toland on this figure. Therefore, this figure has not been revised as part of the Final EIR.

Response 61-93

1. The owners and residents of properties proximate to Toland Road were not directly consulted during preparation of the Draft EIR. The potential impacts along Toland Road, however, were comprehensively addressed in the Draft EIR. With the exception of a significant noise impact to the two residences which front Toland Road if not mitigated, the proposed project would not significantly impact the residences of concern in this comment.

Response 61-94

1. As discussed in Section 3.10.3 of the Draft EIR, the County General Plan includes specific noise standards that are applicable to the proposed project. As discussed in the Draft EIR, impacts to noise sensitive receptors due to the proposed project would be considered significant if noise levels exceed the following County General Plan standard:
 - 1-hour Leq of 55 dBA, or ambient noise level plus 3 dBA (whichever is greater) during any hour between 6:00 a.m. and 7:00 p.m.
2. As discussed in Section 3.10.6 of the Draft EIR, the existing and future nonproject traffic-related cumulative noise conditions along Highway 126 in the project vicinity constitute a significant impact. The Draft EIR also discussed, however, that the project-related traffic volume would result in only an incremental increase to noise level at the Santa Clara School when compared to the existing and future nonproject traffic-related cumulative noise levels. Based on this finding, Section 3.10.8 of the Draft EIR specifies that a statement of overriding considerations for the cumulative nonproject traffic-related noise impact will be required.
3. As discussed in Section 3.10.4 of the Draft EIR, the proposed project's contribution to the traffic-related cumulative noise impact would be a maximum increase of 0.6 dBA under the "worse case" traffic scenario for 2015. In addition, the noise impact due to nonproject-related cumulative traffic on Highway 126 extends beyond the vicinity of Toland Road. Noise conditions along Highway 126 represent a regional issue and are not the responsibility of VRSD. Mitigation measures for the nonproject-related cumulative noise impacts were, therefore, not proposed as part of the proposed project.
4. The County is responsible for determining appropriate project conditions and to consider surrounding land use compatibility when making required County Zoning Ordinance findings. It is important to note, however, that County Zoning Ordinance findings are based on project specific impacts only and are not based on cumulative impacts.

5. As long as the project specific noise impacts do not result in an increase in excess of 3 dBA, the project is considered to meet the County General Plan standards and a consistency finding, as required by the County Zoning Ordinance, can be made. As discussed above, the proposed project's contribution to the traffic-related cumulative noise level at the Santa Clara School would be a maximum of 0.6 dBA under the "worse case" traffic scenario for 2015. Therefore, the proposed project does not exceed the applicable County General Plan noise standard and a consistency finding can be made under the County Zoning Ordinance.
6. Mitigation of the cumulative noise impacts from the nonproject-related traffic volumes on Highway 126 could include the construction of a sound wall along portions of the highway, and/or window and/or building retrofitting of Santa Clara School. As with traffic impacts, measures to mitigate conditions within the right-of-way of Highway 126 would require review and approval by Caltrans. Proportionate (i.e., "fair share") funding of these improvements could be considered by the County for individual projects which contribute to traffic on Highway 126.

Response 61-95

1. This comment raised a concern about dust on the leaves of orchard trees, especially with respect to the destructive Persea mite on avocado trees. Zero tolerance for dust as a concept is inapplicable because its realization would require no travel on dirt roads within and around orchards, nor on Highway 126, nor at the landfill. As noted in Section 3.8.3.2.2 of the Draft EIR, the proposed project would contribute only a few percent of the total PM₁₀ concentration and related deposition. Therefore, the use of watering to control dust from orchard roads is the most effective control that could be implemented by the growers.
2. As discussed in Section 3.12.7 of the Draft EIR, mitigation measures for the control of fugitive dust included, but were not limited to, watering of onsite unpaved roads, and flushing or sweeping of onsite paved roads. The plan is to water unpaved roads, work areas, and storage piles to the extent that fugitive dust can be controlled without causing unpaved roads to become muddy or slippery (i.e., unsafe). An apron would be constructed at the juncture of the unpaved and paved roads to minimize trackout of dirt onto the paved road.
3. In response to this and other comments, a mitigation measure has been included in the EIR to install a wheel washing station that vehicles leaving the landfill active working face on the dirt road would pass through at the apron, which is the transition section at the end of the paved

road where it becomes an unpaved road. The inclusion of this mitigation measure in this Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.

4. The wheel washing station would work in conjunction with the mitigation measures included in Section 3.12.7 of the Draft EIR that require the apron to be flushed with water often enough to assure that the tires cannot track out dirt or mud, and that the onsite paved road shall be swept or water flushed. This combination of measures would significantly reduce the amount of dirt vehicle tires would carry onto Toland Road.
5. At any point in time, only a small area of dirt cover borrow material, unpaved road, and dirt working area in front of the active face is exposed and subject to wind erosion. These areas are treated (e.g., watered) to minimize fugitive dust emissions. Dirt areas of the landfill that make up the rest of the cover borrow piles, top deck of the landfill, and elsewhere that are not being actively disturbed by equipment are treated with water or chemical dust suppressants to sufficiently eliminate emissions of fugitive dust.
6. Also based on this and other comments, a mitigation measure has been included in the EIR that shall require VRSD to pave, or pay the cost to pave, unpaved roads in the vicinity of Toland to mitigate PM₁₀ generated by the proposed project. The linear feet of unpaved road to be paved shall be developed in consultation with the APCD and shall be sufficient to offset the PM₁₀ concentrations from project sources (i.e., offsite mobile emissions and onsite emissions). Based on a preliminary analysis, paving approximately 27,500 linear feet (approximately 5.2 miles) of unpaved roads in the vicinity of Toland would offset the PM₁₀ emissions generated by the "worse case" traffic scenario (i.e., 450 vehicles per day versus the "proposed case" of 210 vehicles per day). The actual linear feet of unpaved road required to be paved to offset the PM₁₀ generated by the proposed project would be based on the number of vehicles traveling to the site on a daily basis. Therefore, potential impacts from the emission of fugitive dust from these dirt roads before paving will be decreased the same amount that the potential impact of the PM₁₀ emissions from the proposed project. The inclusion of this mitigation measure in the Final EIR does not alter the findings or conclusions of the EIR. See Table 1.1 of this Final EIR for the mitigation measures for the proposed project.
7. As requested, a copy of the report entitled, *Agricultural Impact Report: The Potential Impact on Local Agriculture from the Proposed Rail•Cycle Bolo Station Landfill* by Edwin Barnes, Ph.D. of Cal Poly Pomona is included in Appendix F of this Final EIR.

8. The background PM₁₀ data from the Piru monitoring station was used for purposes of the Draft EIR based on a recommendation from APCD. Subsequent to preparation of the Draft EIR, APCD indicated that PM₁₀ monitoring data was available from the SP Milling project at Sycamore Ranch, located approximately 1.7 miles southeast of Toland Road Landfill. The PM₁₀ monitoring stations at Sycamore Ranch are located at an elevation of approximately 500 feet, which is approximately 500 feet lower than the southwest corner of the landfill footprint. The lateral and vertical proximity (1.7 miles and 500 feet, respectively) of these monitoring stations to the landfill assure reasonable representativeness for the PM₁₀ monitoring data.
9. An evaluation of the Sycamore Ranch data provided by APCD indicates that the arithmetic mean PM₁₀ concentration during the period of October 1994 through August 1995 was 15.1 µg/m³, which is 52 percent of the 1994 annual arithmetic mean of 29.1 µg/m³ at Piru. The comment's observations regarding the proximity of the Piru monitoring station to the dry bed of the Santa Clara River may partly explain why the PM₁₀ concentration measured at the Piru station in 1994 (29.1 µg/m³) is almost twice that measured at Sycamore Ranch.
10. Combining the Sycamore Ranch PM₁₀ concentration data with the model data, the range of potential PM₁₀ concentrations in nearby orchards (i.e., up to 0.68µg/m³) that could be generated by the proposed project represents only 4.5 percent of the baseline concentration of PM₁₀ in these orchards.

Response 6-96

1. The commenter's opposition to the proposed project is noted. Safety issues associated with Highway 126 are discussed in Section 3.11.2.5 of the Draft EIR. As depicted on Figure 3.11.4 of the Draft EIR, based on records from Caltrans, the accident rate along Highway 126 in the vicinity of the proposed project site is substantially lower than the statewide average. The highway is a four-lane divided roadway in the vicinity of Toland. Higher accident rates occur east of the project site, particularly east of Fillmore where the highway is only two lanes (with periodic passing lanes).
2. The proposed project would not generate additional waste truck traffic east of Toland Road. The number of vehicles transporting waste from the Santa Clara Valley (Santa Paula, Fillmore, the community of Piru and other unincorporated areas) is expected to continue to be at a maximum of approximately 70 per day. Since the proposed project would not contribute to additional traffic east of Toland Road, it is not anticipated to appreciably increase the

accident risk along Highway 126 east of Toland Road. In addition, because the proposed project would only represent approximately 2.3 percent of the future ADTs for the "worse case" traffic scenario (i.e., packer trucks to transport waste to Toland) on Highway 126 and 1.2 percent of the ADTs for the "proposed case" traffic scenario (i.e., transfer trucks to transport waste to Toland), the proposed project is not anticipated to appreciably increase the accident risk along Highway 126.

3. This comment also expressed a concern regarding the potential for vehicle stacking at the left-turn for Toland Road and the movement of waste trucks into the fast lane of Highway 126 to make this movement. As discussed in Section 3.11.3.1.2 of the Draft EIR, the existing 120-foot, left-turn pocket for eastbound traffic on Highway 126 at Toland Road exceeds the minimum length required pursuant to the Caltrans Highway Design Manual (Caltrans, 1995). The Caltrans design standard for left-turn vehicle storage is based on the number of turning vehicles likely to arrive in an average two minute period during the peak hour (Caltrans, 1995). If the number of trucks during the peak hour represent 10 percent or more of the traffic volume, left-turn vehicle storage space for a minimum of one passenger car and one truck should be provided. As shown in Table 3.11.2, trucks average approximately 11.5 percent of the traffic at the Toland Road/Highway 126 intersection. Based on the peak hour estimate for the "worse case" traffic scenario (as defined in the Draft EIR), on average one packer truck and one passenger car would arrive at the intersection every 2.2 minutes and 2.4 minutes, respectively. The design standard for the left-turn vehicle storage length would be approximately 65 feet (40 feet per packer truck and 25 feet for the passenger car).
4. Under the "proposed case" and the use of transfer trucks, during the peak hour a waste truck would arrive at the intersection an average of once every 10 minutes. Based on the longer truck length for transfer vehicles, the required left-turn storage length for the "proposed case" would be 85 feet (60 feet per transfer truck and 25 feet for the passenger car). Based on the Caltrans design standard, therefore, depending on whether packer trucks or transfer trucks are used, the required left-turn pocket length at the intersection of Toland Road and Highway 126 would range between 65 feet and 85 feet. The existing 120-foot left-turn pocket and configuration at this intersection and approach lanes, as shown in Figure 3.11.3 of the Draft EIR, provides waste trucks and other vehicles adequate distance to safely approach the intersection.

Response 61-97

1. The need for the proposed project is documented in Section 1.2.2 of the Draft EIR. The estimated 1,500 tpd waste to be disposed at Toland under the proposed project is based on waste disposal projections included in the SRREs for the County and its cities served by VRSD. The projections assume compliance with the state-mandated requirement of 50 percent waste diversion by 2000 (AB 939). AB 939 not only establishes mandatory reductions in the volume of solid waste being landfilled, but also requires counties to demonstrate 15 years of landfill capacity for residuals.
2. The County-documented shortfall in landfill capacity is confirmed by a recent CIWMB report which lists Ventura County as one of twenty-one counties statewide which has less than 15 years remaining disposal capacity (CIWMB, 1995). As further discussed in Section 1.2.2.2, of the Draft EIR, even with the diversion program implemented under AB 939, it is estimated in the Draft Ventura Countywide Landfill Siting Element that the County only has nine years of remaining landfill capacity (County, 1995a). The County is required to demonstrate disposal capacity, and a reassessment of landfill capacity is not needed before proceeding with the proposed project.
3. It is probable that this commenter is referencing the VRSD Siting Study (EMCON, 1991). This study did not specifically analyze Toland, but included a site designated as the O'Leary site which encompasses the Toland property. As discussed in Section 4.5.3.3.10 of the Draft EIR, the O'Leary Canyon site (approximately 450 acres) encompasses the majority of the proposed 213-acre project site (see Figure 3.8.7 of the Draft EIR). The project site, however, does not encroach into O'Leary Canyon. The rankings for the O'Leary Canyon site are not, therefore, directly transferable to the Toland site. Several natural resources and development constraints occur on the O'Leary Canyon site which do not occur on the Toland site.
4. An explanation of VRSD Study site rankings compared to the objectives and site boundaries of the Toland Road Landfill Expansion is included in Section 3.8.3.1.5 of the Draft EIR. Included as Table 3.8.3 is a ranking of the Toland site based on the 1991 VRSD Study criteria. An overview of each of the VRSD Study sites, including the top ranking sites, is included in Section 4.5.3 of the Draft EIR.

Response 61-98

1. The alternatives analysis in Chapter 4.0 of the Draft EIR is comprehensive, objective, and meaningful. Thirty-two project alternatives were evaluated including the alternatives identified in comprehensive siting studies previously conducted by the County and by VRSD.

The analysis included the following:

<u>Alternative</u>	<u>Number Evaluated</u>
In-county landfills (waste transport by truck)	1
Out-of-county (waste transport by truck)	4
Rail-haul alternatives	4
Offsite alternative location (within County)	20 ⁽¹⁾
Resource Recovery	1
Reduced Recovery	1
No Project	<u>1</u>
TOTAL	32

(1) Comparative impact analysis of top 20 sites identified in previous siting studies (VRSD Siting Study, CoSWMP, and Weldon EIR).

2. As shown in the above table, the alternatives analysis included the evaluation of 20 offsite alternatives, including the alternatives previously considered in the VRSD Study. Potential environmental impacts associated with each of the alternative sites is summarized in Table 4.7 of the Draft EIR. As concluded in Section 4.5.4 of the Draft EIR, none of the alternative in-County sites provide the opportunity to eliminate significant impacts or reduce overall environmental impacts compared to the proposed project.
3. Compared to the proposed project, development of a new landfill at a currently undisturbed location would allow the installation of a composite liner to minimize the potential for water quality impacts. Development would, however, introduce the potential for water quality degradation for both surface water and ground water resources to a new site. Since the proposed project would not have a significant impact on ground water quality, development of a landfill at an offsite location is unlikely to reduce potential environmental impacts to this resource compared to the proposed project.
4. The potential for out-of-County landfills to accommodate waste proposed to be disposed at Toland under the proposed project is discussed in the respective sections within Chapter 4.0 of the Draft EIR. The need for landfill capacity in both the short-term and long-term is documented in the EIR.

CHAPTER 3.0
CHANGES TO THE DRAFT EIR

3.0 CHANGES TO THE DRAFT EIR

1. This chapter includes minor changes to the Draft EIR that have been made in response to public and agency comments. Copies of the comments, and specific responses to those comments, are included in Chapter 2.0 of this Final EIR. The changes in this chapter provide amplification and clarification of prior information. They do not alter the findings or conclusions of the Draft EIR, but have been included in this Final EIR for completeness.

3.1 CHANGES TO THE DRAFT EIR

1. This section provides changes to the Draft EIR to respond to public and agency comments. The changes are noted by underlining the revised and/or additional text. In the case of revised tables and figures, "Revised" has been included in the title. These changes do not alter the findings or conclusions of the Draft EIR.
 - Section 2.5.2, Paragraph 2. This paragraph is revised as follows based on a comment from the County Environmental Health Division (see Comment and Response 08-4):
 - "2. Figure 2.11 shows the typical LCRS components for a generalized landfill cell. The granular drainage layer (see Figure 2.11) is a blanket-type LCRS that would cover the generally flat portions of the landfill. A synthetic drainage LCRS (see Figure 2.9) would be used as part of the sideslope liner system. The LCRS for the sideslope liners (i.e., synthetic layer, trench an perforated pipe) would be designed to divert any leachate that may be collected around the existing fill areas and around the intermediate soil barrier layer placed over previously received waste. The collected liquids would drain to the LCRS sump, where a submersible pump would be used to extract the collected liquid. The collected liquids would be taken to VRSD's Liquid Waste Treatment Facility or other wastewater treatment facility."
 - Section 2.5.5, Paragraphs 3 and 4. These paragraphs are revised as follows based on a comment from the County Environmental Health Division (see Comment and Response 08-5):
 - "3. Toland is not currently required to have a landfill gas collection system. In accordance with VCAPCD Rule 74.17, a landfill gas collection system is required at the time the cumulative decomposable portion of waste landfilled reaches 500,000 tons. Based on current disposal rates, this is projected to occur in approximately 1998. Under the proposed project, landfill gas wells would be installed into the current waste landfilled at Toland as part of the initial phase of the proposed project (see Figure 2.13). A landfill gas collection system would also be installed for each phase of the proposed operations.
 - 4. The collected landfill gas would be flared at an onsite landfill gas flare station to be installed during the initial phase of the proposed project, pending the necessary design and permitting time period required for such a system. The proposed location of the flare station is shown on

Figure 2.4. Gas monitoring probes would be installed on the landfill perimeter to monitor methane concentrations. Monitoring would be continued during the closure and postclosure monitoring maintenance period, as required by CCR Title 14, Section 17783."

- Section 2.6.1, Paragraph 2. This paragraph is revised as follows based on a comment from the County Environmental Health Division (see Comment and Response 08-7):
 - "2. For landfills existing prior to 1988, preliminary closure and postclosure plans are required to be submitted with the application for a periodic review of the SWFP. VRSD has submitted such plans for Toland as currently permitted. Preliminary closure and postclosure plans for new or expanded landfills must be submitted to and approved by the LEA, RWQCB, and CIWMB as part of the application for a new or revised SWFP. Final closure and postclosure plans must be submitted to the CIWMB, RWQCB, and LEA for approval."
- Section 3.2.3.1.1, Paragraph 7. This paragraph is revised as follows based on a comment from the County Environmental Health Division (see Comment and Response 08-8):
 - "7. The peak horizontal ground acceleration of 1.0g would result in little or no damage to structures specially designed to withstand seismic activity according to the Uniform Building Code (UBC). Based on the seismic analysis accomplished for the proposed project, a design factor of a peak horizontal ground acceleration of 1.0g shall be used for the for the landfill, its associated control systems (e.g., liners, LCRS, landfill gas collection system and flare system, surface drainage and erosion control systems), and building and structures at the site."
- Section 3.3.3.1.2, Paragraph 3. A sentence is added to the end of this paragraph based on a comment from the RWQCB (see Comment and Response 04-3):
 - "3. Nonpotable water would be used for dust control, landscaping, and soil moisture conditioning (i.e., clay for the landfill liner). As part of the proposed project Toland would use approximately 30 acre-feet of nonpotable water per year (based on an average of approximately 40,000 gpd during the warmer/dryer months [i.e., April through November] and 10,000 gpd during the cooler/wetter months). Nonpotable water would be provided from one of the three or a combination of the following sources:
 - A proposed new offsite water well located south of Toland Park (see Figure 1.2). Under an agreement with the owner of this proposed well, water from the well would be delivered to the site via a pipeline proposed to be constructed along Toland Road of by truck (see Figures 1.2 and 2.4).
 - A proposed new well on VRSD's 53-acre parcel (see Figure 2.4). Water from this well would be delivered to the site by pipeline, as shown on Figure 2.4.
 - An agreement with the Rio Water Company of El Rio for VRSD to purchase water at the company's site and transport the water to Toland by truck.

Nonpotable water applied to the landfill for dust control or irrigation would be subject to the WDRs for the proposed project issued by the RWOCB."

- Section 3.3.5, Paragraph 1. The following bullet is added to this paragraph based on a comment from the County Environmental Health Division (see Comment and Response 08-13):
 - "• Prior to the placement of "new" waste on top of previously landfilled waste, an intermediate soil barrier would be installed, which includes a landfill gas collection system beneath the intermediate soil barrier to remove gas from the waste already in place."
- Table 3.4.3 - Potential Sensitive Wildlife Species. This table is revised based on comments from the City of Fillmore (see Comments and Responses 17-35, 17-37, and 17-38).
- Table 3.12.5 - Summary of Annual Air Quality Data. This table is revised based on a comment from the APCD (see Comment and Response 07-9). The revised table is included in Section 3.2 of this Final EIR.
- Table 3.12.10 - Onsite Emission Sources Peak Modeled Concentration Proposed Project and Table 3.13.2 - Health Risk Proposed Project. These tables are revised based on comments from the APCD (see Comments and Responses 07-4, 07-6 and 07-9). The revised tables are included in Section 3.2 of this Final EIR.
- Table 3.12.11 - Offsite and Onsite Emissions Proposed Project. This table is revised based on a comment from the APCD (see Comment and Response 07-10). The revised table is included in Section 3.2 of this Final EIR.
- Table 3.12.12 - Offsite Vehicle Emission Carbon Monoxide Proposed Project. This table is revised based on a comment from the APCD (see Comment and Response 07-1). The revised table is included in Section 3.2 of this Final EIR.
- Table B.3.4 - Toxic Air Contaminant Speciation and Dose-Response Values (Appendix B of this Final EIR). This table is revised based on comments from the APCD (see Comments and Responses 07-3, 07-7 and 07-8). The revised table is included in Appendix B of this Final EIR.
- Figure 3.2.8 - Geologic Cross Sections A-A' and B-B'. This figure is revised based on a comment from the United Water Conservation District (see Comment and Response 19-8). The revised figure is included in Section 3.2 of this Final EIR.

3.2 REVISED TABLES AND FIGURES

1. This section provides revised tables and figures from the Draft EIR. These revisions do not alter the findings or conclusions of the Draft EIR.
 - Revised Table 3.4.3 - Potential Sensitive Wildlife Species. Revised per Comment 17-35, 17-37, and 17-38.

- Revised Table 3.12.5 - Summary of Annual Air Quality Data. Revised per Comment 07-9.
- Revised Table 3.12.10 - Onsite Emission Sources Peak Modeled Concentration Proposed Project. Revised per Comments 07-4, 07-6 and 07-9.
- Revised Table 3.12.11 - Offsite and Onsite Emissions Proposed Project. Revised per Comment 07-10.
- Revised Table 3.12.12 - Offsite Vehicle Emission Carbon Monoxide Proposed Project. Revised per Comment 07-1.
- Revised Table 3.13.2 - Health Risk Proposed Project. Revised per Comments 07-4 and 07-6.
- Table B.3.4 - Toxic Air Contaminant Speciation and Dose-Response Values (Appendix B of this Final EIR). Revised per Comments 07-3, 07-7 and 07-8.
- Revised Figure 3.2.8 - Geologic Cross Sections A-A' and B-B'. Revised per Comment 19-8.

**REVISED
TABLE 3.4.3**

POTENTIAL SENSITIVE WILDLIFE SPECIES⁽¹⁾

SPECIES	STATUS ⁽²⁾	
	State	Federal
REPTILES		
San Diego Horned Lizard (<i>Phrynosoma coronatum blainvillei</i>) ⁽³⁾	CSC	C1
California Horned Lizard (<i>Phrynosoma coronatum frontale</i>) ⁽³⁾	CSC	--
Coastal Western Whiptail (<i>Cnemidophorus tigris multiscutatus</i>) ⁽³⁾	CSC	C2
Silvery Legless Lizard (<i>Anniella pulchra pulchra</i>) ⁽³⁾	CSC	C2
Coast Patch-nosed Snake (<i>Salvadora hexalepis virgulata</i>) ⁽³⁾	CSC	C2
BIRDS		
Cooper's Hawk (<i>Accipiter cooperii</i>)	CSC	--
Yellow Warbler (<i>Dendroica petechia brewsteri</i>) ⁽⁴⁾	CSC	--
Loggerhead Shrike (<i>Lanius ludovicianus</i>) ⁽³⁾	CSC	C2
Tricolored Blackbird (<i>Agelaius tricolor</i>) ⁽³⁾	CSC	C2
Sharp-shinned Hawk (<i>Accipiter striatus</i>) ⁽³⁾	CSC	--
Vaux's Swift (<i>Chaetura vauxi</i>) ⁽³⁾	CSC	--
MAMMALS		
Greater Western Mastiff Bat (<i>Eumops perotis californicus</i>) ⁽⁴⁾	CSC	C2
Pacific Western Big-eared Bat (<i>Plecotus townsendii townsendii</i>) ⁽⁴⁾	CSC	C2
Pallid Bat (<i>Antrozous pallidus</i>) ⁽⁴⁾	CSC	--
Spotted Bat (<i>Euderma maculata</i>) ⁽⁴⁾	CSC	C2
Townsend's Big-eared Bat (<i>Plecotus townsendii</i>) ⁽³⁾	CSC	C2
Yuma Myotis (<i>Myotis yumanensis</i>) ⁽³⁾	--	C2
Long-eared Myotis (<i>Myotis evotis</i>) ⁽³⁾	--	C2
Long-legged Myotis (<i>Myotis volans</i>) ⁽³⁾	--	C2
Fringed Myotis (<i>Myotis thysanodes</i>) ⁽³⁾	--	C2
Los Angeles Pocket Mouse (<i>Perognathus longimembrus brevinasus</i>) ⁽³⁾	CSC	C2
Desert Woodrat (<i>Neotoma lepida</i>)	CSC	C2
San Diego Black-tailed Hare (<i>Lepus californicus bennetti</i>) ⁽⁴⁾	CSC	C2

95-105 (1/6/96/pm)

- (1) Hunt, 1995.
- (2) CSC = California species of special concern.
 C1 = Category 1 candidate for federal listing.
 C2 = Category 2 candidate for federal listing.
- (3) Suitable habitat occurs onsite, however, species was not observed during May 1995 biological survey.
- (4) Habitat and species unlikely to occur within the project site, however, foraging may occur on or near the project area.

REVISED
TABLE 3.12.5

SUMMARY OF ANNUAL AIR QUALITY DATA ($\mu\text{g}/\text{m}^3$)⁽¹⁾

POLLUTANT	LOCATION	PARAMETER ⁽²⁾	AVERAGING TIME	CAAQS	1992	1993	1994
SO ₂	Simi Valley	Maximum Concentration	1 hour	655	52	26 ⁽³⁾	26 ⁽⁴⁾
NO ₂	El Rio	Maximum Concentration	1 hour	470	110 ⁽³⁾	150	190
		Number of Days State Standard Exceeded	-- ⁽⁷⁾	--	0	0	0
		Number of Days Federal Standard Exceeded	--	--	0	0	0
CO	El Rio	Maximum Concentration (mg/m^3)	1 hour	23	2.3 ⁽³⁾	5.8 ⁽³⁾	3.3
		Maximum Concentration (mg/m^3)	8 hours	10	1.4 ⁽³⁾	3.0 ⁽³⁾	2.4
		Number of Days State Standard Exceeded	--	--	0	0	0
		Number of Days Federal Standard Exceeded	--	--	0	0	0
O ₃	Piru	Maximum Concentration	1 hour	180	240	220	280
		Number of Days State Standard Exceeded	--	--	15	4	19
		Number of Days Federal Standard Exceeded	--	--	0	0	2
PM ₁₀	Piru	Annual Arithmetic Mean	1 year	50 ⁽⁵⁾	30.7	28.8	29.1
		Annual Geometric Mean	1 year	30	25.5	23.5	24.1
		Maximum Concentration	24 hours	50	67	118	58
		Percent of Samples Exceeding State 24-hour Standard	--	--	8	12	3
		Percent of Samples Exceeding Federal 24-hour Standard	--	--	0	0	0
PM ₁₀	Sycamore Ranch ⁽⁷⁾	Annual Arithmetic Mean	1 year	50 ⁽⁵⁾	--	--	15.1
		Annual Geometric Mean	1 year	30	--	--	12.0
		Maximum Concentration	24 hours	50	--	--	34.1
		Percent of Samples Exceeding State 24-hour Standard	--	--	--	--	0
		Percent of Samples Exceeding Federal 24-hour Standard	--	--	--	--	0

95-105 Final EIR (1/5/96/cm)

(1) The closest monitoring station to the Toland site is Piru, which only monitors for O₃ and PM₁₀. Data for CO and NO₂ is from the El Rio Monitoring Station located southwest of the site (see Figure 3.12.3 of the Draft EIR). SO₂ is only monitored at the Simi Valley Monitoring Station. Since Simi Valley is located about 25 to 30 miles downwind of the major SO₂ sources, ADCD considers it adequately located to obtain representative concentrations in the County (County, 1994).

(2) Parameters are measured in $\mu\text{g}/\text{m}^3$ unless otherwise noted.

(3) Statistics do not meet criteria for representativeness.

(4) Measured at El Rio (No Simi data).

(5) NAAQS.

(6) -- = Not Applicable.

(7) The PM₁₀ data for Sycamore Ranch was provided by APCD and included data for the 10 month period from October 30, 1994 through August 31, 1995.

REVISED
TABLE 3.12.10
ONSITE EMISSION SOURCES PEAK MODELED CONCENTRATIONS ($\mu\text{g}/\text{m}^3$)
PROPOSED PROJECT

POLLUTANT	AVERAGING TIME	PEAK MODELED CONCENTRATION	BACKGROUND CONCENTRATION	CAAQS	NAAQS	TOTAL CONCENTRATION
SO ₂	1-Hour	12	52(1)	655	-	64
	3-Hour	11	NC	-	1,300	(2)
	24-Hour	0.71	NC	105	365	(2)
	Annual	0.025	NC	-	80	(2)
NO ₂	1-Hour	192	190(3)	470	-	382
	Annual	0.40	NC	-	100	(2)
CO	1-Hour	47	5,800(3)	23,000	40,000	5,847
	8-Hour	33	3,000(3)	10,000	10,000	3,033
PM ₁₀ (Flare and Vehicles)	24-Hour	3.3	34.1(4)	50	150	37.4
	Annual Arithmetic Mean	0.036	15.1(5)	30(6)	50(6)	15.1
Fugitive PM ₁₀	24-Hour	9	34.1(4)	50	150	43.1
	Annual Arithmetic Mean	1.6	15.1(5)	30(6)	50(6)	16.7

95-105 (1/6/96/pm)

- (1) Background concentration is maximum measured at the Simi Valley monitoring station during the period 1992 through 1994.
- (2) Total concentration not calculated because the background concentrations were not calculated by APCD for these averaging times.
- (3) Background concentration is maximum measured at El Rio monitoring station during the period 1992 through 1994 (see Revised Table 3.12.5 of this Final EIR).
- (4) Background concentration is maximum measured at Sycamore Ranch during the period of October 1994 through August 1995 (see Revised Table 3.12.5 of this Final EIR).
- (5) Annual arithmetic mean value measured at Sycamore Ranch.
- (6) Annual geometric mean value.

-- Not applicable standard exists for this pollutant.
 NC = Not calculated. Background concentrations were not calculated by APCD for these averaging times.

**REVISED
TABLE 3.12.11**

OFFSITE MOBILE EMISSIONS PROPOSED PROJECT⁽¹⁾

SOURCE	EMISSIONS (lbs/day) ⁽²⁾				
	NO _x	ROG	SO _x	CO	PM ₁₀
"PROPOSED CASE"⁽³⁾					
• Automobiles (employee vehicles; VRSD staff and visitors)	1.27	0.13	0.22	5.40	0.92
• Light-duty Trucks (self-haul; landscape)	0.59	0.04	0.05	1.83	0.22
• Packer Trucks	83.03	8.55	1.75	40.73	10.07
• Transfer Trucks	89.95	9.26	1.89	44.13	10.91
• Water Truck	3.68	0.38	0.08	1.80	0.45
"Proposed Case" Total	178.51	18.36	3.99	93.89	22.57

"WORSE CASE"⁽³⁾					
• Automobiles	1.27	0.13	0.22	5.40	0.92
• Light-duty Trucks	6.53	0.47	0.59	20.13	2.48
• Packer Trucks	342.32	35.24	7.20	167.95	41.52
• Water Truck	3.68	0.38	0.08	1.80	0.45
"Worse Case" Total	353.80	36.21	8.08	195.28	35.36

ONSITE EMISSIONS PROPOSED PROJECT⁽¹⁾⁽⁴⁾

SOURCE	EMISSIONS (lbs/day) ⁽⁵⁾				
	NO _x	ROG	SO _x	CO	PM ₁₀
PROPOSED EXPANSION					
• Onsite Vehicles	156	11	12	44	67
• Fugitive Landfill Gas	0	107	0	0	0
• Flare	96	2	1	23	12
Total	252	120	13	67	79

95-105 Final EIR (1/8/96/dk)

- (1) Emissions are calculated based on 1,500 tpd of waste (approximately 1,300 tpd from the west county and 135 tpd from the Santa Clara Valley).
- (2) Based on criteria pollutant emissions factors for mobile sources included in CARB's EMFAC7F and EMFAC emission factors developed by the South Coast Air Quality Management District (SCAQMD, 1993).
- (3) See Section 3.11 and Appendix F of the Draft EIR for a discussion of the "Proposed Case" and "Worse Case" traffic scenarios.
- (4) Onsite emissions represent a shift of emissions from Bailard to Toland and do not represent a net emission increase to the County AQMP baseline inventory.
- (5) Emissions documented in Appendix B, Tables B.1.1 and B.1.6 of this Final EIR.

**REVISED
TABLE 3.12.12**

**OFFSITE VEHICLE EMISSION
CARBON MONOXIDE (CO)
PROPOSED PROJECT**

LOCATION	MAXIMUM CONCENTRATION (ppmv)	
	1-Hour Average	8-Hour Average
Background Concentration ⁽¹⁾	5.1	2.6
Highway 126/Toland Road Intersection ⁽²⁾	0.8	0.6 ⁽³⁾
TOTAL	5.9	3.2
CAAQS	20	9

95-105 Final EIR (1/8/96/dk)

- (1) These concentrations in ppmv are calculated from the concentrations in mg/m³ found in Revised Table 3.12.5 of this Final EIR.
- (2) Based on the "Worse Case" traffic volume and flow for the proposed project (see Appendix F of the Draft EIR for a definition of "worse case" traffic volumes).
- (3) Maximum eight-hour concentration of CO was estimated by taking 70 percent of the maximum one-hour concentration of CO, as recommended by CARB.

ppmv = parts per million by volume

REVISED
TABLE 3.13.2

HEALTH RISKS⁽¹⁾
PROPOSED PROJECT

HEALTH RISK ANALYSIS	SIGNIFICANCE THRESHOLD	LOCATION ⁽²⁾					
		Residences and Sensitive Land Uses ⁽³⁾	Offsite Working Population ⁽³⁾	Santa Clara School		Toland Park ⁽⁶⁾	Theoretical MEI ⁽⁷⁾ (Property Boundary)
				Teachers ⁽⁴⁾	Students ⁽⁵⁾		
Carcinogenic Health Risk (Excess Cancer Case Per One Million People):							
• Inhalation	-	0.96	0.06	0.009	0.002	0.00004	6.2
• Dermal Absorption	-	0.004	0.0003	0.00005	0.000007	0.0000002	0.03
• Soil Ingestion	-	0.02	0.001	0.0002	0.00003	0.0000007	0.1
• Water Ingestion	-	0	0	0	0	0	0
• Food Ingestion	-	0.05	0.003	0.0004	0.00008	0.000002	0.3
TOTAL	10 in a million	1.0 in a million	0.06 in a million	0.01 in a million	0.002 in a million	0.00004 in a million	6.6 in a million
Noncarcinogenic Health Risk:							
• Chronic Hazard Index	0.5	0.001	0.0006	0.0001		0.0005	0.009
• Acute Hazard Index	0.5	0.004	0.004	0.002		0.003	0.01

91-105 (1/6/96/pm)

(1) Detailed health risk assessment computer output files are provided in Appendix B of this Final EIR.

(2) See Figure 3.13.1 of the Draft EIR for the location of these receptors.

(3) Within 5 kilometers of the site.

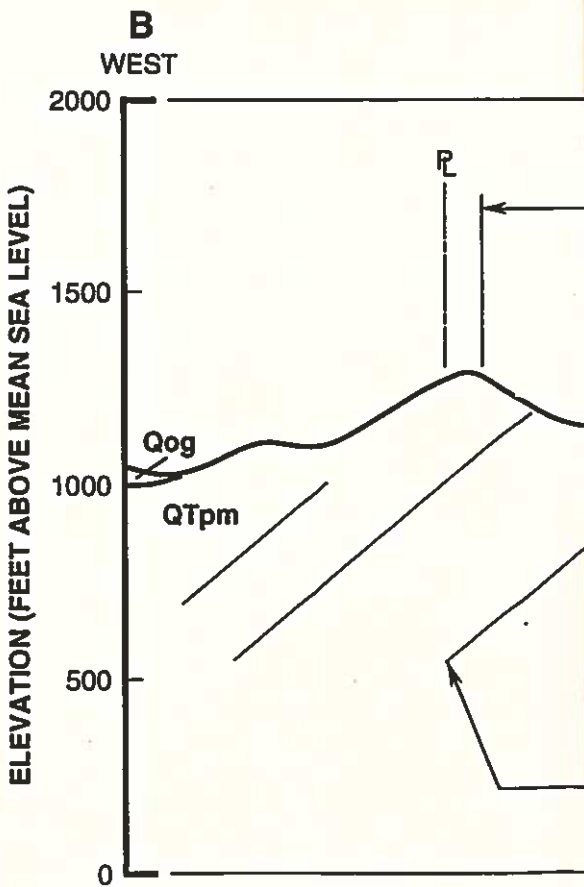
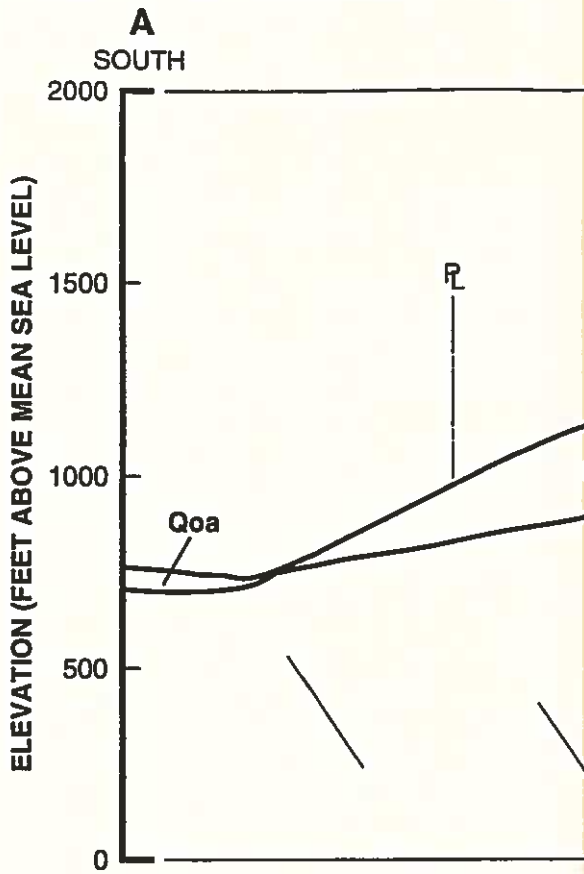
(4) The health risk probability for teachers at the school is based on a 40-year, 8-hour per day exposure.

(5) The health risk probability for students at the school is based on a 7-year, 8-hour per day exposure.

(6) The health risk probability for persons camping at Toland Park is based on a 4-day, 24-hour per day exposure.

(7) Theoretical maximum exposed individual (MEI), assumed to reside at the highest point of offsite exposure, 24 hours per day, 365 days per year, for a period of 70 years.

-- = No data.



AL SEDIMENTS (YOUNG)
 AL SEDIMENTS (INTERMEDIATE)
 AL SEDIMENTS (OLDEST)
 TION
 D FORMATION
 N
 CONTACT INTERPRETED



REVISED FIGURE 3.2.8
**REVISED GEOLOGIC CROSS SECTIONS
 A-A' AND B-B'**
 TOLAND ROAD LANDFILL
 VENTURA REGIONAL SANITATION DISTRICT
 ENVIRONMENTAL SOLUTIONS, INC.

CHAPTER 4.0
PERSONS AND ORGANIZATIONS CONSULTED

4.0 PERSONS AND ORGANIZATIONS CONSULTED

4.1 REPORT PREPARATION

1. The following organizations and individuals were involved in the preparation of, or contributed information to, the Draft EIR and this Final EIR:

- **Lead Agency**
 - Ventura Regional Sanitation District:
 - Doug Anders
 - John Conaway
 - Imelda Cragin
 - Joe Deakin
 - Greg Grant
 - Gary Haden
 - Ed McCombs
 - Lori Norton
 - Kelly White
 - Clinton Whitney
 - Mark Zirbel
- **EIR Consultant**
 - Environmental Solutions, Inc.:
 - Kathleen Bergin
 - Ron Brugger
 - Bruce Evans
 - Larry Gates, P.E.
 - JoAnn Hadfield
 - Ben Hushmand, Ph.D., P.E.
 - Deanna Kress
 - Michael Leonard, P.E.
 - Robert Mason, AICP
 - Marshall Payne, CEG
 - Richard Scott
 - Carolyn Trindle-Smith
 - Craig Vrabel, R.G.
 - Eric Walther, Ph.D.
 - Sharon Williams
- **Other Consultants**
 - Traffic
 - WPA Traffic Engineering, Inc.
 - Steve Sasaki, P.E.
 - Noise Analysis
 - Mestre Greve Associates
 - Fred Greve, P.E.
 - Biology
 - Lawrence Hunt, Ph.D.
 - Paleontology
 - Erathem-Vanir Geological Consultants
 - Gustav Winterfeld, Ph.D.

4.2 ORGANIZATION AND PERSONS CONSULTED

1. The following organizations and persons were consulted with or provided substantial information regarding the proposed project during preparation of the Draft EIR and this Final EIR:

- **Federal Agencies**
 - U.S. Fish and Wildlife Service
- **State Agencies**
 - California Department of Education
 - R. Oliphant
 - California Division of Oil, Gas, and Geothermal Resources
 - Steven Fields
 - California Highway Patrol
 - M.J. Porrazzo, Captain
 - California Integrated Waste Management Board
 - Marcia Keesey
 - California Regional Water Quality Control Board
 - Rod Nelson
 - Caltrans, District 7
 - Wilford Melton
- **Local Agencies**
 - Ventura County
 - Air Pollution Control District
 - Chris Frank
 - Terri Thomas
 - Chuck Thomas
 - County Fire Department
 - Craig Morgan
 - County Sheriff's Department
 - R.A. Diaz, Lieutenant
 - Environmental Health Division
 - Terry Gilday
 - Tom Kaufman
 - General Services Agency, Recreation Services
 - Theresa Lubin
 - Planning Division
 - Scott Ellison
 - Bob Laughlin
 - Kim Hocking
 - Judith Ward
 - Lynne Kada

- Public Works Agency
 - Steve Manz
 - John Turner
 - Lowell Preston
 - Laverne Hoffman
- Resource Management Agency
 - Tom Berg
- Solid Waste Management Department
 - Kay Martin
- City of Fillmore
 - Fillmore Fire Department
 - Patrick Askren, Chief
- City of Santa Paula
 - Santa Paula Fire Department
 - Paul Skeels, Chief
 - Santa Paula Police Department
 - Walter Adair, Chief
- School Districts
 - Briggs School District
 - Carol Vines, Superintendent
 - Fillmore Unified School District
 - Mario Contini, Superintendent
 - Santa Clara Elementary School District
 - T.M. McCracken, Superintendent
 - Santa Paula Elementary
 - B. Bruengton, Asst. Superintendent
 - School District
 - R.C. Chase, Asst. Superintendent
 - Santa Paula Union High School District
 - Robert Fisher, Superintendent
- Los Angeles Department of Public Works
 - Waste Management Division
 - Dave Smith
- Los Angeles County
 - Department of Regional Planning
 - Richard Frazier
- **Organizations**
 - California Native Plant Society
 - Tom Keeny
 - National Audubon Society
 - Glenn Olson

- **Southern California Edison**
 - **Jim Nichols**
 - **Robert Reid**
- **Southern California Gas Company**
 - **R. Shirley**
- **Ventura Audubon Society**
 - **Art Marshall**

CHAPTER 5.0
LIST OF ABBREVIATIONS

5.0 LIST OF ABBREVIATIONS

1. The definitions below are provided as clarification for abbreviations used in the Draft EIR and in this Final EIR:

AB	Assembly Bill
ADA	Average Daily Attendance
ADTs	Average Daily Trips
A-E	Agricultural Exclusive Zone
APCD	Ventura County Air Pollution Control District
AQMP	Air Quality Management Plan
Bailard	Bailard Landfill
°C	Degrees in Celsius
Cal-EPA	California Environmental Protection Agency
CAAQS	California Ambient Air Quality Standards
CALINE4	California Line Source Dispersion Model - Fourth Generation
Cal-OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDC	U.S. Department of Health Services, Center for Disease Control
CDFA	California Department of Food and Agriculture
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CDWR	California Department of Water Resources
CNDDB	California Natural Diversity Data Base
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CHP	California Highway Patrol
CIWMB	California Integrated Waste Management Board
CMP	Congestion Management Plan
cm/sec	centimeter per second
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society

5.0 LIST OF ABBREVIATIONS (Continued)

CO	carbon monoxide
CO ₂	carbon dioxide
CIWMP	County Integrated Waste Management Plan
CoSWMP	County Solid Waste Management Plan
County	County of Ventura
CPR	cardiopulmonary resuscitation
cfs	cubic feet per second
CUP	Conditional Use Permit
CWMB	California Waste Management Board
dB	decibels
dBA	A-weighted decibel
DRE	destruction and reduction efficiency
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
°F	Degrees in Fahrenheit
FAA	Federal Aviation Administration
FHWA	Federal Highway Administration
FML	Flexible Membrane Liner
ft/day	feet per day
g	gravitational acceleration
gpd	gallons per day
gpd/ft	gallons per day per foot
gpm	gallons per minute
H ₂ S	hydrogen sulfide
HCM	Highway Capacity Manual
HHWE	Household Hazardous Waste Element
HDPE	high density polyethylene
HI	Hazard Index
HQ	Hazard Quotients
ICU	Intersection Capacity Utilization
ISC2	Industrial Source Complex Model - Version 2
km	kilometer
kW	kilowatt
LAFCO	Local Agency Formation Commission

5.0 LIST OF ABBREVIATIONS (Continued)

LCA	Land Conservation Act
LCRS	Leachate Collection and Removal System
LEA	local enforcement agency
Leq	equivalent noise level
Lmax	maximum noise level
LOS	level of service
M	Magnitude
MCL	Maximum Concentration Level
MEI	maximally exposed individual
mg/L	milligrams per liter
mm	milliliter
MPE	maximum probable event
mph	miles per hour
msl	mean sea level
mybd	million years before present
NAAQS	National Ambient Air Quality Standards
NMOCs	non-methane organic compounds
NO ₂	nitrogen dioxide
NO _x	oxides of nitrogen
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NPDES	National Pollution Discharge Elimination System
O ₃	ozone
OCS	Outer Continental Shelf
OSHA	Occupational Safety and Health Administration
O-S	Open Space Zone
Pb	lead
PGA	peak ground acceleration
PM ₁₀	Suspended particulate matter less than 10 micrometers in aerodynamic diameter
ppb	parts per billion
ppm	parts per million
ppmv	parts per million by volume
PTO	Permit to Operate
PVC	polyvinyl chloride
RCRA	Resource Conservation and Recovery Act

5.0 LIST OF ABBREVIATIONS (Continued)

RDSI	Report of Disposal Site Information
ROG	reactive organic gas
RWQCB	California Regional Water Quality Control Board - Los Angeles Region
SCCAB	South Central Coast Air Basin
SCE	Southern California Edison Company
SGD	Staal, Gardner & Dunne, Inc.
SO ₂	sulfur dioxide
SO _x	oxides of sulfur
SO ₄	sulfates
SPFD	Santa Paula Fire Department
SPPD	Santa Paula Police Department
SRRE	Source Reduction and Recycling Element
SWAT	Solid Waste Assessment Test
SWFP	Solid Waste Facilities Permit
SWPPP	Stormwater Pollution Prevention Plan
Toland	Toland Road Landfill
tpd	tons per day
UBC	Uniform Building Code
UCLA	University of California, Los Angeles
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geologic Surveys
UWCD	United Water Conservation District
VCEHD	Ventura County Environmental Health Division
VCFD	Ventura County Fire Department
VMT	vehicle miles traveled
VOC	volatile organic compound
VRSD	Ventura Regional Sanitation District
WDRs	Waste Discharge Requirements
ybd	years before date

CHAPTER 6.0
REFERENCES AND RESOURCES

6.0 REFERENCES AND RESOURCES

6.1 TECHNICAL REPORTS

1. Various technical reports were prepared for the proposed project and were used in the preparation of the Draft EIR and this Final EIR (see Table 6.1). These technical reports have been provided, as appropriate, to responsible agencies along with the EIR. Copies of these technical reports are available for public review at the following location:

- Ventura Regional Sanitation District
1001 Partridge Drive, Suite 110
Ventura, California

TABLE 6.1
TECHNICAL REPORTS

REPORT	AUTHOR	DATE
Focused Geologic Investigation Toland Road Landfill	Environmental Solutions, Inc.	July 1995
Faulting and Seismicity Technical Report Toland Road Landfill	Environmental Solutions, Inc.	September 1995
Noise Assessment for the Toland Road Landfill Expansion	Mestre Greve Associates	July 1995
Traffic Study Toland Road Landfill Expansion	WPA Traffic Engineering, Inc.	July 1995
Paleontologic Resource Evaluation Toland Road Landfill	Erathem-Vanir Geological Consultants	May 1995
Biological Resources Toland Road Landfill Expansion	Lawrence E. Hunt, Ph.D. Consulting Biologist	May 1995
Inventory and Evaluation of Cultural Resources Within the Toland Road Landfill Project Area	Kathleen Bergin, Environmental Solutions, Inc.	June 1995
Investigation of Surface Water Seeps in the Vicinity of the Toland Road Landfill	Environmental Solutions, Inc.	August 1995
Geologic and Geotechnical Investigation Toland Road Landfill	Environmental Solutions, Inc.	January 1996

95-105 Final EIR (12/19/95/cm)

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CHAPTER 7.0
FINAL EIR MAILING LIST

7.0 FINAL EIR MAILING LIST

1. The following public officials, agencies and individuals received copies of the Final EIR:

FEDERAL

U. S. Fish and Wildlife Service
Southern California Field Station
Carlsbad, CA 92008

L.A. County - Dept. of Regional Planning
Attn: Frank Meneses
Los Angeles, CA 90012

Mr. James Acosta
VRSD Board of Directors
Ventura, CA 93004

STATE

California Air Resources Board
Sacramento, CA 95812

Mr. Tom Berg
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State Water Resources Control Board
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City of Moorpark
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City of Ojai
Planning and Building Department
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City of Port Hueneme
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City of San Buenaventura
Planning Department
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Coalition to Stop
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Attn: Steve McClany
Fillmore, CA 93015

Fillmore Herald
Fillmore, CA 93015

Los Angeles Times
Attn: Julie Wilson, Editor
Ventura, CA 93003

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Attn: Tamara McCracken
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Business Council
John Macik - Chairman
Santa Paula, CA 93061

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Santa Paula, CA 93060

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Simi Valley, CA 93065

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Ashby and Carolyn Vickers
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2. The following individuals, agencies and organizations received copies of the Notice of Availability and Chapter 1.0 of the Final EIR:

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Downey, CA 90240

Ball Family Trust
Downey, CA 90241

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Ojai, CA 93024

Mr. Grant Brimhall
City Manager
City of Thousand Oaks
Thousand Oaks, CA 91362

City of Agoura Hills
Planning & Community Department
Agoura Hills, CA 91301

City of Westlake Village
Planning Department/Planning Director
Westlake Village, CA 91361

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Valley Advisory Committee
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Camarillo, CA 93011

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City Manager
City of Fillmore
Fillmore, CA 93016

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City Manager
City of Simi Valley
Simi Valley, CA 93063

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Port Hueneme, CA 93041

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Ventura, CA 93004

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Santa Paula, CA 93060

Sam Braslaw
Santa Paula, CA 93060

Mr. Chris Byk
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Santa Paula, CA 93060

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Santa Paula, CA 93060

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CK Consultants
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Simi Valley, CA 93063-2199

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Robert Lunch
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John Macik III
Santa Paula Business Council
Santa Paula, CA 93061

Mr. Les Maland
Santa Paula, CA 93060

Mr. & Mrs. Mawley
Acton, CA 93510

Mr. & Mrs. Robert D Mazzeo
Woodland Hills, CA 91367

Edwin T. McFadden, III
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Kinsie McMahan
Fillmore, CA 93015

Ms. Laya Murphy
Ventura, CA 93004

Mr. & Mrs. Steve Onstot
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Mr. William Orcutt
Santa Paula, CA 93060

Leonard Ortiz
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Robert Power
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R.A. Procter
Landowner - Limoneira Co.
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Tim Reed
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Paul Romero
Santa Paula, CA 93060

Ralph Salis
Santa Paula, CA 93060

Sawyer Family Rev Trust
Santa Barbara, CA 93108

Mr. James Sharp
Santa Paula Airport Association
Santa Paula, CA 93060

Mr. Dick Shubert
Ventura, CA 93002

Mr. Steve T. Smead
State Farm Insurance Companies
Santa Paula, CA 93061

Mr. Douglas Smith
Santa Paula, CA 93060

Greg and Maxine Spracklen
Santa Paula, CA 93060

Joan & Russell Temple Jr.
Santa Paula, CA 93060

Doug Tubbs
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Dr. Jeffrey V. Tubbs
Santa Paula, CA 93060

Usha Viswanathan
Fillmore, CA 93015

Ross Wileman
Santa Paula, CA 93060

Tres Frutos LTD
Pacific Palisades, CA 90272

Mr. & Mrs. Mich Yamamoto
Santa Paula, CA 93060

Flo Zakrajshek
Santa Paula, CA 93060

MEDIA

Print - General and Business

Susan Vinson, Editor
Business Digest
Ojai, CA

Business Journal (Camarillo Chamber of
Commerce)
Camarillo, CA 93010

Business Report (Simi Valley Chamber of
Commerce)
Simi Valley, CA 93065

Chamber News and Local Views
(Port Hueneme Chamber of Commerce)
Port Hueneme, CA 93041

Conejo Business Times (Conejo Valley
Chamber of Commerce)
Thousand Oaks, CA 91360

Hispanic Chamber of Commerce Newsletter
Oxnard, CA 93030

La Opinion
Los Angeles, CA 90013

Ojai Valley Chamber of Commerce Newsletter
Ojai, CA 93023

Ojai Valley News
Ojai, CA 93023

Oxnard Today (Oxnard Chamber of Commerce)
Oxnard, CA 93030

The Venturan (Greater Ventura Chamber of
Commerce)
Ventura, CA 93003

Vida
Oxnard, CA 93032

Television

KEYT-TV
Santa Barbara, CA

VCNN/KADY
Oxnard, CA

Radio

KBBY - Thunder Radio
Ventura, CA 93003

KCAQ-FM (Q-105)
Oxnard, CA

KTRO-AM 1520
Oxnard, CA 93003

KVEN/KHAY
Ventura, CA 93002

KXBS-FM
Ventura, CA 93003

KXLM-FM 102.9
Oxnard, CA 93030

3. Copies of the Final EIR are available for review at the following locations:

- Ventura Regional Sanitation District
1001 Partridge Drive, Suite 110
Ventura, California
- Fillmore City Hall
524 Sespe Avenue
Fillmore, California
- Santa Paula City Hall
970 Ventura Street
Santa Paula, California
- Libraries
 - County of Ventura
Public Law Library
800 South Victoria Avenue
 - Fillmore Public Library
502 2nd Street
Fillmore, California
 - Santa Paula Public Library
119 North 8th Street
Santa Paula, California
 - E.P. Foster Library
651 East Main Street
Ventura, California
 - Camarillo Library
3100 Ponderosa Drive
Camarillo, California
 - Ray Prueter Library
510 Park Avenue
Port Hueneme, California
 - Oxnard Library
251 South A Street
Oxnard, California
 - Ojai Library
111 East Ojai Avenue
Ojai, California
 - Thousand Oaks Library
1401 East James Road
Thousand Oaks, California

4. A copy of the Final EIR is available for reproduction at the following location:

- Kinko's Copies
4360 East Main Street
Ventura, California

Please note, persons requesting a copy of the Final EIR at the above location are responsible for the cost of reproduction.

**APPENDIX A
OPERATIONAL PROCEDURES AND REGULATORY
REQUIREMENTS, AND MITIGATION MEASURES**

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

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS(1)	MITIGATION MEASURES(2)(3)
Geology and Soils	<p>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 III landfills:</p> <ul style="list-style-type: none"> • 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. 	<p>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:</p> <ul style="list-style-type: none"> • 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 of 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)

(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.

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

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Geology and Soils (Continued)		<ul style="list-style-type: none"> • 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. • 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) • 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. • 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. • A maximum setback for clean fill slopes shall be a minimum of 20 feet from the property line. (Final EIR)
Water Resources	<p>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:</p> <ul style="list-style-type: none"> • As required by CCR Titles 14 and 23, and Subtitle D, waste disposal areas would be constructed with composite liners and an LCRRS. • A landfill gas collection system would be installed at the landfill. 	<p>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:</p> <ul style="list-style-type: none"> • 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 a detention basin.

(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.

**TABLE A.1
OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES
(Continued)**

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Water Resources (Continued)	<ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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. • Placement of soil berms around the landfill working face during storm events. • Construction of detention basin at south end of landfill footprint. 	<ul style="list-style-type: none"> • 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 the 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 and design of the sideslope liner shall include, as appropriate, methods to collect water from surface water seeps. (Final EIR) <p>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 Ornard 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:</p> <ul style="list-style-type: none"> • 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.

(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.

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

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
<p>Water Resources (Continued)</p>		<ul style="list-style-type: none"> • To offset the increase in water usage at Toland from wells under the proposed expansion (a maximum of 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: <ul style="list-style-type: none"> - Reduce water usage at the Ballard 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)
<p>Biological Resources</p>	<p>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:</p> <ul style="list-style-type: none"> • Lighting would be shielded and internally directed so as to minimize effects to neighboring wildlife habitat. • 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 a.m. 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. 	<p>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:</p> <ul style="list-style-type: none"> • The limits of 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 habitat shall be avoided and left in its natural condition. The landfill slope gradient south of the seep shall be designed to preclude the possibility for landslides due to gravity or storm events. • The bank of 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.

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**TABLE A.1
OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES
(Continued)**

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Utilities, Services and Housing	<p>The following design features shall be included in the project to assure that demands on utilities would be minimized:</p> <ul style="list-style-type: none"> • 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. 	<p>The proposed project would not result in significant impacts to utilities and services infrastructure or housing; therefore, no mitigation measures are required.</p>
Cultural Resources	<p>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.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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 of 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, evaluation, and recovery activities are completed. Construction and landfill personnel should be informed of these requirements.

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

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Cultural Resources (Continued)		<p>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)</p> <ul style="list-style-type: none"> • 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 cataloging 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	<p>No standard operating procedures regarding paleontological resources are in place at the landfill. No regulatory requirements are defined for paleontological resources.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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.

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OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES
 (Continued)

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TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Paleontological Resources (Continued)		<ul style="list-style-type: none"> • 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. • 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 to the lowest taxon possible. A report containing monitoring results, including an itemized list of fossils, shall be submitted to YRSD. 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.

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AND MITIGATION MEASURES
(Continued)

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Visual Resources	<p>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:</p> <ul style="list-style-type: none"> • Shielding and directing lights downward to prevent glare or direct illumination of offsite areas. • Revegetation of disturbed areas during phased closure of the landfill. 	<p>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:</p> <ul style="list-style-type: none"> • To the extent practicable, disturbed areas and final slopes of the landfill shall be regraded to blend with the surrounding terrain. (Final EIR)
Noise	<p>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 provisions to assure that landfill operations do not result in noise being a nuisance.</p> <p>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:</p> <ul style="list-style-type: none"> • 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. 	<p>The following mitigation measures shall be implemented as part of the proposed project:</p> <ul style="list-style-type: none"> • 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 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. <p>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.</p>

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**TABLE A.1
OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES
(Continued)**

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Traffic	<p>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).</p>	<ul style="list-style-type: none"> • 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. <p>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:</p> <p><u>With Signalization</u></p> <ul style="list-style-type: none"> - In conjunction with the traffic signal, appropriate signing, striping, and traffic control devices would be implemented to make people aware of the presence of the signal.

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

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Traffic (Continued)		<p><u>Without Signalization</u></p> <ul style="list-style-type: none"> - 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	<p>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:</p> <ul style="list-style-type: none"> • 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 postclosure activities as required by CCR Title 14, Section 17783. 	<p>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:</p> <ul style="list-style-type: none"> • 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 life span 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.

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OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES
(Continued)**

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Air Quality (Continued)		<ul style="list-style-type: none"> • Fugitive dust emissions shall be controlled through some combination of the following: <ul style="list-style-type: none"> - 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. - 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) <p>The following are examples of mitigation measures that could reduce the regional impact associated with offsite mobile emissions:</p> <ul style="list-style-type: none"> • 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.

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OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES
(Continued)

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS(1)	MITIGATION MEASURES(2)(3)
Air Quality (Continued)		<ul style="list-style-type: none"> 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	<p>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:</p> <ul style="list-style-type: none"> 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 (BACT), 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. 	<p>The proposed project would not result in a significant health risk impact; therefore, no mitigation measures are required.</p>
Nuisance	<p>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:</p> <ul style="list-style-type: none"> Good housekeeping practices at the landfill to reduce the potential of vector habitat or harborage. Compaction of waste at the active working face. 	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> Posting signs at the landfill entrance and scalehouse noting antilittering laws and the requirement for loads to be properly covered.

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TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Nuisance (Continued)	<ul style="list-style-type: none"> • 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 both English and Spanish and would indicate the date of closure and alternative permitted landfills available to accept waste. 	<ul style="list-style-type: none"> • 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)

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(Continued)

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Nuisance (Continued)	<p>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.</p>	<ul style="list-style-type: none"> • 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) • 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	<p>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:</p> <ul style="list-style-type: none"> • Daily fill and cover operations to minimize 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. 	<p>The proposed project would not result in a significant health and safety impact; therefore, no mitigation measures are required.</p>

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 (Continued)

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Health and Safety (Continued)	<ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> - 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 face. - 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 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: <ul style="list-style-type: none"> - 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. <ul style="list-style-type: none"> • 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. 	

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**TABLE A.1
OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES
(Continued)**

TOPICAL AREA	OPERATIONAL PROCEDURES AND REGULATORY REQUIREMENTS ⁽¹⁾	MITIGATION MEASURES ⁽²⁾⁽³⁾
Health and Safety (Continued)	<ul style="list-style-type: none"> • 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. • Use of dust control measures to keep dust at a minimum and lessen incident of Valley Fever (see Section 3.12). 	

(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.

APPENDIX B
AIR QUALITY EMISSIONS DATA

APPENDIX B

AIR QUALITY TECHNICAL APPENDIX

- B.1 Emissions Inventory Tables**
- B.2 Air Quality Modeling**
 - B.2.1 Offsite Emissions**
 - B.2.2 Onsite Emissions**
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B.1 EMISSIONS INVENTORY TABLES

- B.1.1 Site Related Emissions - Proposed Project**
- B.1.2 Toland Equipment Emission Factors**
- B.1.3 MSW Landfill Methane and LFG Generation Rate - Proposed Project**
- B.1.4 MSW Landfill CH₄ Generation Rate**
- B.1.5 LFG Destruction Device Parameters**
- B.1.6 Site Related Fugitive PM₁₀ Emissions - Proposed Project**
- B.1.7 Fugitive PM₁₀ Emission Factor Development**

TABLE B.1.1
SITE-RELATED EMISSIONS
PROPOSED PROJECT

Source	Parameter	Parameter	Annual	Utilization Factor	No. units	Distance (miles)	NOx		PM10		SOx		CO		Notes	
							Emission Factor	Emis (lb/day)	Emission Factor	Emis (lb/day)	Emission Factor	Emis (lb/day)	Emission Factor	Emis (lb/day)		
SOLID WASTE HAUL, AND EMPLOYEE VEHICLES:	Solid Waste Packer	0	1,480 tons per day	-	175	5.74	10.22	22.6	2.48	5.5	0.97	2.1	10.31	22.8	3,38E-06 (1)	
	Truck Engines (Diesel)	0	80 tons per day	-	80	5.74	0.30	0.3	0.07	0.1	0.0	0.0	1.97	2.0	1.48E-06 (1)	
	Light-Duty Truck Engines (Gasoline)	1	20 tons per day	-	40	5.74	0.17	0.1	0.045	0.0	0.0	0.0	1.39	0.7	8.19E-07 (1)	
	Private Vehicle Engines (Gasoline)	0.5	20 tons per day	-	40	5.74	0.17	0.1	0.045	0.0	0.0	0.0	1.39	0.7	8.19E-07 (1)	
RIBTOTAL			1,500				23.0	23.0	2.2	5.6	2.2	2.2	23.3	23.3	6.04E-06	
LANDFILL GAS:																
LFG Generated	-	-	-	-	2.26	-	-	-	-	-	-	-	-	-	(2)	
LFG, Fugitive (15%)	-	-	-	-	0.34	-	-	-	314	107	-	-	-	-	(4)	
LFG, Flare (85%)	0.15	-	-	-	1.57	-	-	-	0.0023	2.2	0.0005	11.5	0.0239	22.9	(5)	
RIBTOTAL							96.0	96.0	109.3	109.3	11.5	11.5	22.9	22.9		
NORMAL LANDFILL OPERATIONS:																
Spread & Compact Incoming Solid Waste:																
637B Scrapper Engine	700 hp	0.66 load factor	1	65%	1	NA	5450	5.3	216	0.2	117	0.1	528	0.5	515	1.83E-07 (6)
D9N Dozer Engine	335 hp	0.59 load factor	12	65%	1	NA	2386	24.2	70	0.7	60	0.6	226	2.3	370	9.41E-07 (6)
826C Compactor Engine	341 hp	0.59 load factor	12	65%	1	NA	2920	29.6	70	0.7	90	0.9	250	2.3	300	9.58E-07 (6)
Water Wagon (613C Scrapper)	175 hp	0.66 load factor	4	65%	1	NA	1310	5.0	40	0.2	50	0.2	125	0.5	170	1.83E-07 (6)
Subtotal (Spread & Compact Incoming Solid Waste) Daily Cover:							64.1	64.1	1.8	1.8	1.8	1.8	9.9	9.9	2.27E-06	
637B Scrapper Engine	700 hp	0.66 load factor	8	50%	1	NA	5450	32.9	216	1.5	117	0.7	528	3.1	515	1.47E-06 (6)
Water Wagon (613C Scrapper)	175 hp	0.66 load factor	4	65%	1	NA	1310	5.0	40	0.2	50	0.2	125	0.5	170	1.83E-07 (6)
140 Grader Engine	200 hp	0.575 load factor	4	65%	1	NA	2370	7.8	160	0.6	15	0.0	135	0.4	205	1.83E-07 (6)
Subtotal (Daily Cover)							45.6	45.6	2.0	2.0	0.9	0.9	4.0	4.0	1.83E-06	
Unpaved Road Dust Control:																
Water Wagon (613C Scrapper)	175 hp	0.66 load factor	4	65%	1	NA	1310	5.0	40	0.2	50	0.2	125	0.5	170	1.83E-07 (6)
Subtotal (Unpaved Road Dust Control)							5.0	5.0	0.2	0.2	0.2	0.2	0.6	0.6	1.83E-07	
Equipment/Site Maintenance:																
958E Loader Engine	150 hp	0.465 load factor	8	65%	1	NA	1650	8.8	105	0.6	10	0.1	102	0.5	220	2.21E-07 (6)
IT28B Tractor Engine	117 hp	0.465 load factor	8	65%	1	NA	780	4.2	72	0.4	44	0.2	85	0.5	105	1.73E-07 (6)
Backhoe Engine (Assumed similar to IT28B)	117 hp	0.465 load factor	8	65%	1	NA	780	4.2	72	0.4	44	0.2	85	0.5	105	1.73E-07 (6)
Light Truck (Gasoline) Engine	NA	NA	10	100%	6	1.87	0.30	0.1	0.07	0.0	0.0	0.0	0.05	0.0	1.97	4.00E-07 (1)
Medium/Heavy-Duty Truck (Diesel) Engine	NA	NA	12	100%	2	1.87	10.22	1.0	2.48	0.2	0.97	0.1	0.28	0.0	10.31	1.60E-07 (1)
Subtotal (Equipment/Site Maintenance)							18.2	18.2	120.4	120.4	17.2	17.2	12.8	12.8	1.15E-05	
TOTAL							251.8	251.8	120.4	120.4	17.2	17.2	12.8	12.8	67.1	1.15E-05

Notes:
 1) SOx emission factors are from SCAQMD, 1993, CEQA Air Quality Handbook, Table A9-5.1, for Year 2009, vehicles travelling at 25 mph.
 2) Other emission factors are from EPA/CAATP (CARB) for Year 2020, vehicles travelling at 25 mph.
 3) Landfill gas generation rate is based on an EPA model, as described in AP-42, Section 2.4.4.
 4) RLOC conc. = 4,700 BOD ppm in Billed Landfill vent and RLOC molecular wt. = 25.5 g/g mole.
 5) Emission factors for Toluene from VCAQMP, Appendix L-94, Activity 6, CSB Company #1167, and LFG assumed to contain 500 MMBTU/mt.
 6) Emission factors are from Chaperelle Corp. Load factors are from SCAQMD CEQA Air Qual. Table (1993), Table A9-8-D.

ISCC Modeling Groups	NOx		PM10		SOx		CO	
	Emission Factor (g/g)	Emis (lb/day)	Emission Factor (g/g)	Emis (lb/day)	Emission Factor (g/g)	Emis (lb/day)	Emission Factor (g/g)	Emis (lb/day)
Flare Group 1	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01	0.00E-01
Vehicle Group 2	1.39E-00	6.97E-01	4.54E-02	2.27E-02	3.94E-02	1.79E-02	4.37E-01	1.21E-01
Vehicle Group 3	4.02E-01	2.01E-01	7.22E-03	3.61E-03	2.89E-02	1.44E-02	4.19E-02	1.19E-02
Vehicle Group 4	3.18E-01	1.59E-01	1.98E-02	9.9E-03	1.07E-02	5.36E-03	4.72E-02	1.27E-02

Table B.1.2

Toland Equipment Emission Factors

VCAQMP, Appendix L-94, Activity 49

Equipment	NOx	ROC	PM10	SOx	CO
	(g/hp/hr)	(g/hp/hr)	(g/hp/hr)	(g/hp/hr)	(g/hp/hr)
Light-Duty Industrial Equip. - Diesel					
41-100 HP	11	1.2	0.79	1.36	4
101-175 HP	11	1	0.69	1.36	3.4
Light-Duty Industrial Equip. - Gasoline					
41-100 HP	3	8.25	0.06		235
101-175 HP	4.5	7.5	0.06		215
Heavy-Duty Non-Farm Equip. - Diesel					
176-300 HP	12	1	0.58	1.36	2.8
301-500 HP	13	0.9	0.58	1.36	2.2
Heavy-Duty Non-Farm Equip. - Gasoline					
176-300 HP	4	6.75	0.06		185
301-500 HP	4	6	0.06		175

EMFAC7F Emission Factors

Equipment	NOx	ROC	PM10	SOx	CO
	(g/mi)	(g/mi)	(g/mi)	(g/mi)	(g/mi)
Light-Duty Autos, Catalytic Converter	0.165	0.045	0.01	0.05	1.39
Heavy-Duty Trucks, Diesel	10.22	2.48	0.97	0.28	10.31
Light-Duty Trucks, Catalytic Converter	0.30	0.07	0.01	0.05	1.97

1) SOx emission factors from SCAQMD CEQA Air Qual. Hdbk, Table A9-5-L, Year 2009.

2) Speed = 25 mph.

Caterpillar Published Emission Factors

Machine Model	Engine #	Gross hp	NOx	ROC	PM10	SOx	CO
			g/hr	g/hr	g/hr	g/hr	g/hr
14G Grader	3306	200	2370	180	15	135	205
225 Excavator			1560	60	20	110	175
325 Excavator	3116	183	1437	10	10	118	85
3406C Truck (18 W)			150	6.5	10	25	45
613C Water Wagon	3208	175	1310	40	50	125	170
623E Scraper	3406B	382	2291	44	77	230	317
627E-S Scraper	3306	225	2760	260	10	170	220
627E-T Scraper	3406	330	2300	45	80	230	320
637E-S Scraper	3306	250	2390	144	28	223	200
637E-T Scraper	3408	450	3261	73	89	305	315
657E Scraper	D343	400	2019	27	45	276	180
657E Tractor	3412	550	4221	100	98	379	310
824C Compactor	3406	315	2798	60	46	216	500
826C Compactor	3406	341	2920	70	90	230	500
936E Wheeled Loader	3304	145	1399	80	9	97	100
936F Wheeled Loader	3304	150	1650	105	10	102	220
950F Wheeled Loader	3116	180	1594	15	19	119	100
CS443B Compactor			940	25	15	80	50
D3B Dozer	3204	65	590	60	15	45	80
D5H Dozer	3304	132	1240	75	10	90	75
D6D-LGP Dozer	3306	153	1660	110	15	105	110
D6H-LGP Dozer	3306	179	2020	50	15	120	145
D8L Dozer	3408	335	2386	70	60	226	370
D9N Dozer	3408	401	2520	250	55	270	305
IT18 Integrated Tool	3204	101	635	65	20	75	85
IT28B Integrated Tool	3204	117	780	72	44	85	105

**Table B.1.3
MSW LANDFILL CH4 & LFG GENERATION RATE**

I) GENERAL INFORMATION:

PARAMETER	VALUE
Analysis Title	Last day of Waste Processing CH4 & LFG Generation Toland Landfill
Analysis Preparation Date	1/3/96

II) CONSTANTS:

PARAMETER	VALUE	UNITS	NOTES
LFG Generation Date	7/27/27	date	(1)
Condensate Generation Rate	380	gal/MMCF LFG	(2)

III) CALCULATIONS:

PARAMETER	UNITS	EXISTING PERMIT	CURRENT (Prior to Imp. of AB 939)	CURRENT (25% Waste of AB 939)	PHASE I (25% Waste) Red: AB 939	PHASE I (50% Waste) Red: AB 939	PHASE II	PHASE III	PHASE IV	NOTES
Start of Landfilling	Date	6/1/70	6/1/94	12/31/94	8/1/96	12/31/99	4/12/01	2/15/03	4/1/14	
End of Landfilling	Date	6/1/94	12/31/94	8/1/96	12/31/99	4/12/01	2/15/03	4/1/14	7/27/27	
Landfilling Interval	years	24.02	0.58	1.59	3.42	1.28	1.85	11.13	13.33	
Time After Closure	years	33.18	32.59	31.01	27.59	26.31	24.46	13.33	0.00	
Landfilling Days/year	days	256	256	256	308	308	308	308	308	(3)
Waste Flowrate	tons per day	98	135	135	1,500	1,500	1,500	1,500	1,500	(4)
Waste in Place	million tons	0.6	0.02	0.1	1.6	0.6	0.9	5.1	6.2	(4)
Cumulative Waste In Place	million tons	0.6	0.6	0.7	2.3	2.8	3.7	8.8	15.0	(4)
CH4 Per Unit MSW [G]	cu ft per lb	0.66	0.66	0.63	0.63	0.67	0.67	0.67	0.67	(5)
CH4 & LFG Half-life	years	20	20	20	20	20	20	20	20	(7)
LFG Generation Rate	scfm	22	1	3	95	41	62	474	869	
CH4 Generation Rate	scfm	11	1	2	47	21	31	237	435	(6)
Cumulative LFG Gen. Rate	scfm	22	24	27	121	162	225	699	1568	
Cumulative CH4 Gen. Rate	scfm	11	12	13	61	81	112	349	784	
LFG Condensate	gallons/day	12	1	2	52	22	34	259	476	
Cumulative Condensate	gallons/day	12	13	15	66	89	123	382	858	

Notes:

- 1) LFG = Landfill Gas.
- 2) Gallons condensate per million cubic feet (MMCF) of LFG reported for Puente Hills Landfill.
- 3) Based on 5 or 6 days per week operation and 4 holidays per year.
- 4) Calculation varies based on whether a total landfill volume or waste flowrate is known. Calculation based on number of days of landfill operation per year.
- 5) CH4 per unit MSW [G] is a "linked field" with the CH4 Generation Rate spreadsheet.
- 6) Calculation of LFG Generation Rate is based on AP-42, Sec. 2.4.4, eqn. #1
- 7) Estimated for relatively dry waste exposed to fairly low precipitation.

Table B.1.4 MSW LANDFILL METHANE GENERATION RATE

ENVIRONMENTAL SOLUTIONS, INC.
VERSION 93228

I) SITE INFORMATION:

Parameter	Value	Units	Notes
Site Name	Toimad Landfill		
Site Location	Fillmore, California		
Landfill Phase	1.5K Ton Disposal Rate		
Date	12/14/95		

II) CONSTANTS:

Parameter	Value	Units	Notes
MSW Composition	1.300	kilobubic yard	(1)
Exposure Time of MSW Layer in Topmost Position	0.25	years	(1)
Height (thickness) of MSW Cell/LIR	15	feet	(1)
Infiltration Fraction	30%	percent	(9)
Precipitation	20	inches/year	(8)

III) CALCULATIONS:

Component Index	Waste Component	Molecular Formula	Molecular Weight (lb/mole)	Carbon Atoms Per Molecule	Composition of Waste Stream (%)	Mass of Waste Component Per Unit Wet MSW (lb)	Wet Basis Moisture Content (%)	Dry Mass Per Unit MSW (lb)	Water Mass Per Unit MSW (lb)	Precipitation Mass Deposited on Unit Area (lb)	Wet Basis Moisture Content After Infiltration (%)	Total LFG Generated Per Unit MSW (cu ft/lb)	CH ₄ Generated Per Unit MSW (cu ft/lb)	Notes
			[M]	[e]	[C]	[m = C/100]	[Ww]	[md = m * ((1-Ww)/100)]	[m' = m * md]	[mp]	[Ww' = (m' + mp) / (md + m' + mp)]	[e = a * md * Ww' / 100 / M]	[G]	[2]
A) Pre-1995 (Prior to Implementation of AB 939):														
1	Food	C6H12O6	180	6	10	0.10	70	0.03	0.07	6.73E-04	70.20	7.02E-04	0.14	(3)
2	Paper	C6H10O5	162	6	40	0.38	6	0.38	0.02	8.44E-03	7.94	1.11E-03	0.21	
3	Vegetation	C6H10O5	162	6	18	0.18	60	0.07	0.11	1.62E-03	60.36	1.61E-03	0.31	
4	Remainder	Inorganic	NA	0	32	0.32	6	0.30	0.02	0.00E+00	6.00	0	0.00	
SUM	MSW Residue	NA	NA	NA	100	1.00	NA	0.78	0.22	1.07E-02	NA	3.42E-03	0.66	
B) 1995 - 1999 (25 Percent Waste Reduction - AB 939):														
1	Food	C6H12O6	180	6	13	0.13	70	0.04	0.09	1.06E-03	70.24	9.13E-04	0.18	(3)
2	Paper	C6H10O5	162	6	31	0.31	6	0.29	0.02	7.91E-03	8.34	9.01E-04	0.17	
3	Vegetation	C6H10O5	162	6	16	0.16	60	0.06	0.10	1.74E-03	60.43	1.43E-03	0.28	
4	Remainder	Inorganic	NA	0	40	0.40	6	0.38	0.02	0.00E+00	6.00	0	0.00	
SUM	MSW Residue	NA	NA	NA	100	1.00	NA	0.77	0.23	1.07E-02	NA	3.25E-03	0.63	
C) 2000, and Beyond (50 Percent Waste Reduction - AB 939):														
1	Food	C6H12O6	180	6	20	0.20	70	0.06	0.14	2.06E-03	70.31	1.41E-03	0.27	(4)
2	Paper	C6H10O5	162	6	20	0.20	6	0.19	0.01	6.47E-03	8.94	6.23E-04	0.12	
3	Vegetation	C6H10O5	162	6	16	0.16	60	0.06	0.10	2.20E-03	60.54	1.44E-03	0.28	
4	Remainder	Inorganic	NA	0	44	0.44	6	0.41	0.03	0.00E+00	6.00	0	0.00	
SUM	MSW Residue	NA	NA	NA	100	1.00	NA	0.73	0.27	1.07E-02	NA	3.46E-03	0.67	
Notes														

Notes:

- MSW = Municipal Solid Waste.
- Variables and equations shown in brackets are described in "Theory and Methodology of Landfill Gas Generation" (Environmental Solutions, Inc., 1993).
- AB 939 = California Assembly Bill 939, Integrated Solid Waste Management Act of 1989.
- Mixture content (Ww) and pre-1995 MSW composition are based on Solid Waste Association of North America's (SWANA's) course for Managers of Landfill Operations (1991). 1995-1999 and post-1999 MSW compositions are based on estimated recycling opportunity for different components of MSW.
- Estimation of precipitation deposited on unit area [mp] based on the constants listed in Section II.
- LFG = Landfill Gas.
- CH₄ generation rate in volume at reference temperature = 20 °C and atmospheric pressure = 1 atmosphere.
- Gas Research Company. Climates of the States, Volume 1, Detroit, Michigan, 1978, and estimated from the 18.6 in. measured between 1957 and 1993 at the Fillmore Fish Hatchery Station, which is 6.8 mi. southeast of site.
- Estimated by landfill operations personnel.

**Table B.1.5
LFG DESTRUCTION DEVICE
PARAMETERS
TOLAND LANDFILL**

PARAMETER	UNITS ⁽¹⁾	Proposed Project Flare	Unit Rating
Total LFG Generated	10 ⁶ acf/day	2.26	
Total LFG Collected ⁽²⁾			
• Actual flow rate (daily)	10 ⁶ acf/day	1.92	2.2
• Actual Flow rate	acfm	1,333	1534
• Standard flow rate	scfm	1,303	1500
Stack Height	feet	20	20
	meters	6.1	6.1
Stack Diameter	feet	9.5	9.5
	meters	2.9	2.9
Stack Temperature	degrees F	1,400	1,400
	degrees K	1,033	1,033
Stack Velocity	feet/second	12	13
	meters/second	3.5	4.1
Stack Flowrate	acfm	49,500	57,000
Number of Flares		1	
Number of Flares Stations		1	

Notes:

- (1) 10⁶ acf = million actual cubic feet
acfm = actual cubic feet per minute
scfm = standard cubic feet per minute
10⁶ BTU = million British thermal units
(2) LFG collection efficiency: 85%

**TABLE B.1.6
SITE-RELATED FUGITIVE PM₁₀ EMISSIONS
PROPOSED PROJECT**

Source Category	Source Description	Annual Amount (tons/year)	Duration (days/year)	UMM Station	No. vehicles	Emissions (lb/day)	Emissions (lb/year)	Emissions (lb/day)	Emissions (lb/year)	Emissions (lb/day)	Emissions (lb/year)	Emissions (lb/day)	Emissions (lb/year)	Emissions (lb/day)	Emissions (lb/year)	Notes	
																	Controlled PM ₁₀ Emissions (lb/day)
Paved Road	Heavy 184 to Unimproved Road Near Working Face	12	12	8 tons per load	175 vehicles/day	5.74	6.2	0.0082	3.4	0.0015	1.5	4.9	5,138.02	1,000	5,138.02	1.2	
	Commercial Waste Load And Back-Haul	8	8	1 tons per load	49 vehicles/day	5.74	2.1	0.0082	1.56	0.0004	0.3	1.3	2,798.02	1,000	2,798.02	1.2	
	Lights Duty Truck	8	8	1 tons per load	49 vehicles/day	5.74	1.4	0.0082	0.78	0.0004	0.1	0.9	1,398.02	1,000	1,398.02	1.2	
	Private Vehicle	8	8	0.5 tons per load	245 vehicles/day	5.74	0.02	0.0082	0.01	0.0004	0.002	0.01	1,348.04	1,000	1,348.04	1.2	
	Employee Vehicle	13	13	0.5 tons per load	1 vehicle/day	5.43	0.7	0.0082	0.38	0.0004	0.05	0.4	5,458.03	1,000	5,458.03	1.2	
	Operations Center to Unimproved Road Near Working Face	10	10	1 tons per load	6 vehicles/day	1.97	0.3	0.0082	0.15	0.0004	0.02	0.3	1,338.03	1,000	1,338.03	1.2	
	Light-Duty Truck	13	13	1 tons per load	3 vehicles/day	1.97	11.5	0.0082	6.3	0.0004	1.1	1.3	1,008.01	1,000	1,008.01	1.2	
	Medium-Duty Truck	12	12	0 tons per load	175 vehicles/day	0.04	3.2	0.0082	11	0.0015	0.014	0.014	1,102.01	1,000	1,102.01	2.3	
	Subtotal Paved Road Emissions																
	Unimproved Road	Commercial Waste Load And Back-Haul	8	8	1 tons per load	49 vehicles/day	0.04	14	3.20	3	0.0004	0.0000	3.1	7,778.02	1,000	7,778.02	2.3
		Lights Duty Truck	8	8	1 tons per load	49 vehicles/day	0.04	7.3	3.20	3	0.0004	0.0010	2.5	3,948.02	1,000	3,948.02	2.3
		Private Vehicle	8	8	0.5 tons per load	245 vehicles/day	0.04	11	3.20	4	0.0004	0.0015	3.9	4,788.02	1,000	4,788.02	2.3
Employee Vehicle		10	10	1 tons per load	6 vehicles/day	0.04	4.3	3.20	2	0.0004	0.0008	1.5	1,398.02	1,000	1,398.02	2.3	
Light-Duty Truck		12	12	1 tons per load	3 vehicles/day	0.04	4.7	3.20	24	0.019	0.019	21.0	3,088.01	1,000	3,088.01	2.3	
Medium-Duty Truck		12	12	0 tons per load	175 vehicles/day	0.04	27.5	3.20	9.6	0.0015	0.01	9.6	1,018.01	1,000	1,018.01	2.3	
Subtotal Unimproved Road Emissions																	
SUBTOTAL - UNPAVED ROAD EMISSIONS																	
<p>Notes:</p> <p>1) Pavement control efficiency set at 45%, which is lower than the value listed in SCAG/MD CDEQA Air Quality Handbook, Table A11-9-A on p. A11-77 for areas swept once a day with water.</p> <p>2) Emissions during a drive day are only included during hours specified in the notes (column 4).</p> <p>3) Unimproved road control efficiency set at 45%, which is the middle of the range listed in SCAG/MD CDEQA Air Quality Handbook, Table A11-9-A on p. A11-78 for roads watered infrequently.</p> <p>4) Calculated from 1,500 tons of ASWP per day, 1500 trucks x 4 (ASWP), 1:4.5 cover to match in water ratio, and 21 on 30 scraper capacity.</p>																	

**TABLE B.1.6
SITE-RELATED FUGITIVE PM₁₀ EMISSIONS
PROPOSED PROJECT**

Source Category	Source Description	Amount (lb/day)	Duration (hours/day)	Unit emission factor	No. units	Stack height (ft)	Emission rate (lb/day)	(Continued)		Controlled PM ₁₀ Emissions (lb/day)	Controlled PM ₁₀ Emissions (lb/day) (lb/day) × 365	Uncontrolled PM ₁₀ Emissions (lb/day)	Emission Control Efficiency (%)	Technology	PM ₁₀ Reduction Rate (lb/day)	PM ₁₀ Emissions Factor	Notes
								PM ₁₀ Emissions (lb/day)	PM ₁₀ Emissions (lb/day)								
Disturbed Area: Working Area - Truck Traffic	Working Area - Truck Traffic	171 tons per day	12	0.04 tons per load	171	0.04	7.32E+00	7.32E+00	7.32E+00	1,908.00	1,908.00	1,908.00	Thru-daily watering	1,908.00	1,908.00	2.3	
	Solid Waste Pile	10 tons per day	6	1.67E-01 tons per load	10	0.04	3.34E+00	3.34E+00	3.34E+00	1,308.00	1,308.00	1,308.00	Thru-daily watering	1,308.00	1,308.00	2.3	
	Light Duty Truck	80 tons per day	8	0.5 tons per load	80	0.04	1.67E+00	1.67E+00	1.67E+00	618.00	618.00	618.00	Thru-daily watering	618.00	618.00	2.3	
	Heavy Vehicle	20 tons per day	10	1 tons per load	20	0.04	2.51E+00	2.51E+00	2.51E+00	7,818.00	7,818.00	7,818.00	Thru-daily watering	7,818.00	7,818.00	2.3	
NORMAL LANDFILL OPERATIONS - Spread & Compact Incoming Solid Waste:																	
Disturbed Area: Daily Cover Stockpile	DNV Dumper	11 tons per day	11	5% load factor	11	0.04	1.08E+00	1.08E+00	1.08E+00	3,948.00	3,948.00	3,948.00	Thru-daily watering	3,948.00	3,948.00	2.3	
	WAC Compactor	11 tons per day	11	5% load factor	11	0.04	1.08E+00	1.08E+00	1.08E+00	3,948.00	3,948.00	3,948.00	Thru-daily watering	3,948.00	3,948.00	2.3	
	Wagon (13C Series)	11 tons per day	11	5% load factor	11	0.04	1.08E+00	1.08E+00	1.08E+00	3,948.00	3,948.00	3,948.00	Thru-daily watering	3,948.00	3,948.00	2.3	
	Solid Waste Dumping at Daily Cover	11 tons per day	11	5% load factor	11	0.04	1.08E+00	1.08E+00	1.08E+00	3,948.00	3,948.00	3,948.00	Thru-daily watering	3,948.00	3,948.00	2.3	
	Solid Waste Dumping at Daily Cover	11 tons per day	11	5% load factor	11	0.04	1.08E+00	1.08E+00	1.08E+00	3,948.00	3,948.00	3,948.00	Thru-daily watering	3,948.00	3,948.00	2.3	
	Excavator (Cover & Compact Incoming Solid Waste)	11 tons per day	11	5% load factor	11	0.04	1.08E+00	1.08E+00	1.08E+00	3,948.00	3,948.00	3,948.00	Thru-daily watering	3,948.00	3,948.00	2.3	
	67B Scraper	11 tons per day	11	5% load factor	11	0.04	1.08E+00	1.08E+00	1.08E+00	3,948.00	3,948.00	3,948.00	Thru-daily watering	3,948.00	3,948.00	2.3	
	DNV Dumper	11 tons per day	11	5% load factor	11	0.04	1.08E+00	1.08E+00	1.08E+00	3,948.00	3,948.00	3,948.00	Thru-daily watering	3,948.00	3,948.00	2.3	
	Wagon (13C Series)	11 tons per day	11	5% load factor	11	0.04	1.08E+00	1.08E+00	1.08E+00	3,948.00	3,948.00	3,948.00	Thru-daily watering	3,948.00	3,948.00	2.3	
	140 Grader	11 tons per day	11	5% load factor	11	0.04	1.08E+00	1.08E+00	1.08E+00	3,948.00	3,948.00	3,948.00	Thru-daily watering	3,948.00	3,948.00	2.3	
UNCONTROLLED-DISTURBED AREA EMISSIONS																	
Wind Emissions: Active Working Area	90 acres (length of side)	24	24	0.16 lb/acre-day	24	0.04	1.08E+00	1.08E+00	1.08E+00	3,948.00	3,948.00	3,948.00	Thru-daily watering	3,948.00	3,948.00	2.3	
Wind Emissions: Daily Cover Stockpile	45 acres (length of side)	24	24	0.16 lb/acre-day	24	0.04	1.08E+00	1.08E+00	1.08E+00	3,948.00	3,948.00	3,948.00	Thru-daily watering	3,948.00	3,948.00	2.3	
TOTAL FUGITIVE PM₁₀ EMISSIONS																	
															61		

1) Dusts assumed to operate during the 12 hours when trucks unload events, plus an extra hour for completion. The engine load factor is based on SCAQMD recommendations for diesel (CRQA, 11/93, Table A3-4-D).
 2) Compactor assumed to operate when dumper operations, and with same load factor.
 3) Wagon assumed to operate when dumper operations, and with same load factor.
 4) Wagon assumed to operate when dumper operations, and with same load factor.
 5) Wagon assumed to operate when dumper operations, and with same load factor.
 6) Compactor assumed to operate when dumper operations, and with same load factor.
 7) Wagon assumed to operate when dumper operations, and with same load factor.

**TABLE B.1.7
FUGITIVE PM10 EMISSION FACTOR
DEVELOPMENT WORKSHEET**

D) Vehicle Travel on Paved Roadways

- A) Emission Factor (VCAQMP, Appendix L-94, Activity 32, assuming roadways equivalent to major streets/highways), because intensity of traffic and cleaning greater than local/collector streets).
- B) $EF(I) = 0.0062 \text{ lb/vmt}$

II) Vehicle Travel on Unpaved Roadways:

- A) Emission Factor (VCAQMP, Appendix L-94, Activity 33, Travel on City and County Roads):
- B) $EF(II) = 3.2 \text{ lb/vmt}$

III) Wind Erosion - Disturbed Areas & Vegetated LF Cover

- A) Agricultural Fields Emission Factor (VCAQMP, Appendix L-94, Activity 36, PM10 fraction = 0.5):
 $EF(III) = 115.07 \text{ lb per acre per year} / 365 \text{ days per year} / 0.5$
- B) $EF(III) = 0.16 \text{ lb/acre-day}$
- C) Undisturbed, naturally vegetated area
- D) $EF(III) = 0.0001 \text{ lb/acre-day}$

IV) Dirt/Debris Pushing Operations

- A) Emission Factor (SCAQMD Table A9-9-F):
 $EF(IV) = [(0.45)(G^{1.5})(H^{1.4})](I) \text{ lb/dozer-hour}$
- where:
- G = Silt Loading (percent): 6 (sand and gravel plant road)
- H = Moisture content of surface material (percent): 27 (solid waste)
14 (cover material)
- I = Conversion factor kg/hr to lb/hr: 2.2046
- B) $EF(IV) = 0.14 \text{ lb/dozer-hour (solid waste)}$
 $0.36 \text{ lb/dozer-hour (cover material)}$

**TABLE B.1.7
FUGITIVE PM10 EMISSION FACTOR
DEVELOPMENT WORKSHEET
(Continued)**

V) Storage Pile Filling/Truck Dumping

A) Emission Factor (SCAQMD Table A9-9-G):

$$EF(V) = (0.00112) \{ [(G/5)^{1.3}] / [(H/2)^{1.4}] \} \text{ lb/ton-day}$$

where:

G = Mean wind speed (mph):

H = Moisture content of surface material (percent):

12 (SCAQMD Table A9-9-G)
27 (solid waste)
14 (cover material)

B) EF(V) = 9.14E-05 lb/ton-day (solid waste)
 2.29E-04 lb/ton-day (cover material)

B.2 AIR QUALITY MODELING

B.2.1 OFFSITE EMISSIONS

- B.2.1.1 - Carbon Monoxide Hotspots Analysis**
- B.2.1.2 - Offsite Emissions Calculation (Proposed Expansion)**
- B.2.1.3 - Offsite Emissions Calculation (Alternatives Analysis)**
- B.2.1.4 - Train Emissions Analysis**

B.2.1.1 - Carbon Monoxide Hotspots Analysis

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 12/5/95 Subject _____ Sheet No. 1 of 14
Chkd. By _____ Date _____ Proj. No. 95-105

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CARBON MONOXIDE HOT SPOTS
ANALYSIS

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B.2.1.1-1

BY: S.W. DATE: 12/5/95
CKD BY: RB DATE: 12/15/95

SHEET 2 OF 14

Carbon Monoxide Hot Spots Analysis

1.0 PURPOSE

1. The purpose of this calculation is to compute carbon Monoxide (CO) emissions from vehicular traffic at the intersection of Toland Road and State Route 126 (SR 126), also referred to as Telegraph Road .
2. Additionally, this calculation will determine the impact of the CO emissions on the Santa Clara School located approximately 300 feet southwest of the intersection.

2.0 METHODOLOGY

1. CALINE 4 computer model (*Air Quality Analysis Tools (AQAT-3)*, by Patrick C. Randall and Arthur Diamond, State of California Air Resources Board, Stationary Source Division, issued 1989) was used to predict CO concentrations, at Receptor 1 (the Santa Clara School), of traffic volumes based upon a traffic study developed by WPA Traffic Engineering, Inc, Figure 6, "Year 2015 Traffic Volumes" (Attachment A).
2. The following two cases were analyzed due to their high traffic volume:
 - Peak morning hour (reference files "TOLANDAM.CAL" and "TOLAM126.CAL").
 - Peak evening hour (reference files "TOLANDPM.CAL" and "TOLPM126.CAL").
3. Two separate emission factors (calculated as described below) were required for each case described above, due to the different mixes of traffic traveling onto and off of Toland Road versus the traffic cruising straight through the intersection on SR126. Since CALINE 4 accepts only one overall emission factor for each link in one run, each case was split into two runs as follows:
 - An intersection with traffic entering and leaving the intersection modeled as 5 links, and no straight through traffic on SR126.
 - A road 'at grade', consisting only of the straight through westbound (WB) and eastbound (EB) traffic modeled as 2 links.

Total CO concentrations for each case were obtained by summing the results of two CALINE 4 runs . Results of the computer runs are presented in Table 1 .

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 12/5/95 Subject CO HOT SPOTS Analysis Sheet No. 3 of 14

Chkd. By PS Date 12/15/95 TABLE 1 Model Results Proj. No. 95-105

TABLE 1A MORNING PEAK HOUR RESULTS

RUN 1 MODEL RESULTS FOR FILE C:TOLANDAM

RECEPTOR	* PRED	* WIND *	COCN/LINK				
	* CONC	* BRG *	(PPM)				
	* (PPM)	* (DEG) *	A	B	C	D	E
RECPT 1	* 0.6	* 66 *	0.5	0.1	0.0	0.0	0.0

RUN 2 MODEL RESULTS FOR FILE C:TOLAM126

RECEPTOR	* PRED	* WIND *	COCN/LINK	
	* CONC	* BRG *	(PPM)	
	* (PPM)	* (DEG) *	A	B
RECPT 1	* 0.2	* 81 *	0.1	0.1

TOTAL CO Concentration = $0.6 + 0.2 = 0.8$ ppm

TABLE 1B EVENING PEAK HOUR RESULTS

RUN 1 MODEL RESULTS FOR FILE C:TOLANDPM

RECEPTOR	* PRED	* WIND *	COCN/LINK				
	* CONC	* BRG *	(PPM)				
	* (PPM)	* (DEG) *	A	B	C	D	E
RECPT 1	* 0.6	* 63 *	0.2	0.4	0.0	0.0	0.0

RUN 2 MODEL RESULTS FOR FILE C:TOLPM126

RECEPTOR	* PRED	* WIND *	COCN/LINK	
	* CONC	* BRG *	(PPM)	
	* (PPM)	* (DEG) *	A	B
RECPT 1	* 0.2	* 81 *	0.1	0.1

TOTAL CO concentration = $0.6 + 0.2 = 0.8$ ppm



ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 12/5/95 subject Link Layout for Sheet No. 4 of 14
 Chkd. By RB Date 8/15/95 CO Hot Spots Analysis Proj. No. 95-105

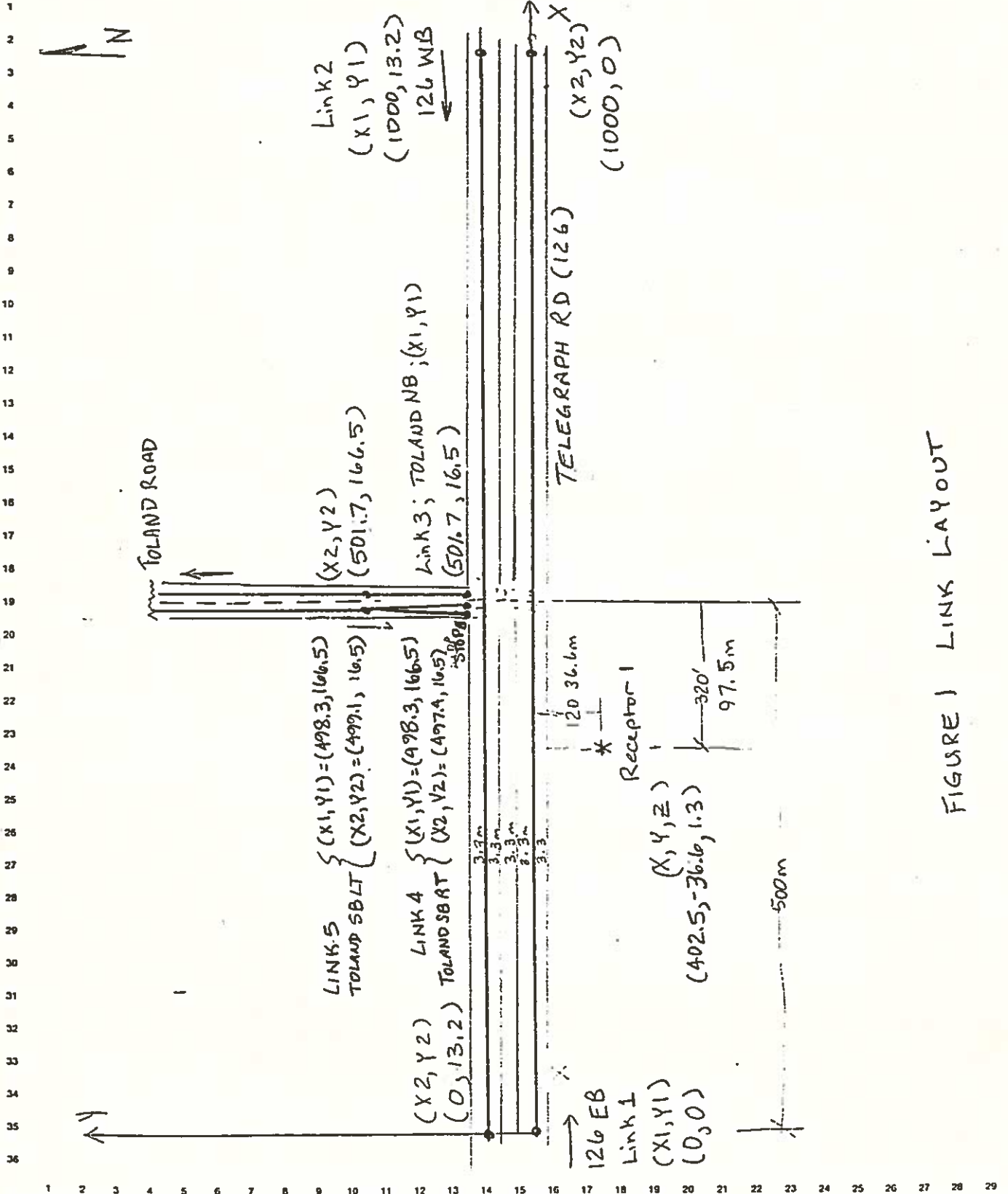


FIGURE 1 LINK LAYOUT

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By SW Date 12/5/95 Subject CO HOT SPOTS Sheet No. 5 of 14
 Chkd. By RZ Date 12/19/95 Analysis Proj. No. 95105

Table 2 LINK COORDINATES

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LINK Descriptions	X1	Y1	X2	Y2	Z
LINK 1: SR 126 EB	0	0	1000	0	0
LINK 2: SR 126 WB	1000	13.2	0	13.2	0
LINK 3: TOLAND RD NB	501.7	16.5	501.7	166.5	0
LINK 4: TOLAND RD SB - RT	498.3	166.5	497.4	16.5	0
LINK 5: TOLAND RD SB LT	498.3	166.5	499.1	16.5	0
Receptor 1: Santa Clara school	402.5	-36.6	-	-	1.3

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 12/5/95 Subject CO HOT SPOTS ANALYSIS Sheet No. 6 of 14

Chkd. By AB Date 12/15/95 ^{TABLE 3} INPUT PARAMETERS FOR CALINE 4 Proj. No. 95-105

LINK Descr.	Vehicles/Hour (VPH)		EMISSION FACTOR (EF) (groms/mile)		RUN 2	Hourly Departure Volume (VPHD)		FIRST Vehicle Idle TIME (IDTS) (sec)	
	AM	PM	RUN 1			AM	PM	AM	PM
<u>RUN 1:</u>									
<u>LINK 1:</u> <u>126 EB</u>	(50+28) 78	(60+6) 66	4.46	N/A		(5+0) 5	(1+2) 3	19.0	13.9
<u>LINK 2:</u> <u>126 WB</u>	(0+3) 3	(1+0) 1	4.46	N/A		(50+0) 50	(18+49) 67	1	1
<u>LINK 3:</u> <u>TOLAND NB</u>	Program Run 1	Program Run 1	4.88	N/A		(50+0+28+3) 81	(60+1+6+0) 67	0	0
<u>LINK 4:</u> <u>TOLAND SB RT</u>	(50+0) 50	(18+49) 67	4.88	N/A		Program Run 1	Program Run 1	6.9	6.4
<u>LINK 5:</u> <u>TOLAND SB LT</u>	(5+0) 5	(1+2) 3	4.88	N/A		Program Run 1	Program Run 1	297.7	297.7
<u>RUN 2:</u>									
<u>LINK 1:</u> <u>126 EB</u>	1010	1665	N/A	1.64		1010	1665	0	0
<u>LINK 2:</u> <u>126 WB</u>	1465	1425	N/A	1.64		1465	1425	0	0

BY: S.W. DATE: 12/5/95
CKD BY: RB DATE: 12/15/95

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Carbon Monoxide Hot Spots Analysis

4. Emission factors for each vehicle type at 55 miles per hour (mph) and 35 mph were obtained from CARB's emission factor computer model, EMFAC7F1.1. The following is the methodology for obtaining the overall emission factor:

-Individual vehicle type emission factors for summertime (at 75 degrees F) and wintertime (corrected to 75 degrees F from 50 degrees F) for year 2020 were averaged.

-The average vehicle type emission factors were corrected to 60 degrees F (15.5 degrees C as used in CALINE 4).

-Percentages of traffic types were obtained as describe in Attachment B, Table B.1 notes 1 and 2.

-Traffic type percentages were converted to fractions and multiplied by their respective emission factors (referred to as the apportioned emission factor(s) in Table B.1)

-The emission factors used in each run of CALINE 4 were obtained by adding the apportioned emission factors for the respective run.

5. CALINE 4 was run for worst case meteorological conditions in which the wind direction (wind bearing) was directly at the receptor. Wind bearings are given in the results Table 1.

3.0 ASSUMPTIONS / GIVENS

3.1 CALINE 4 INPUTS - SITE VARIABLES

1. Link Descriptions are shown in Figure 1.
2. Link Coordinates are listed in Table 2.

3.1.1 Run 1: Intersection of Toland and SR 126

The following input parameters apply to the peak morning hour and peak evening cases. Where different input parameters vary for peak hours, see Table 3 as referenced below.

1. Link 1: 126 EB

a. Vehicles per Hour (VPH) (See Table 3) is defined as the traffic volume for the hour being modeled, including the vehicles approaching the intersection and turning onto this link.

b. Emission Factor (EF) (See Table 3) is the overall emission factor for the traffic mix used for this run.

c. Roadway Width (W) = 12.6 meters (assumed from the model literature to be 3.3 meters per lane, times 2, plus a mixing zone of 3 meters on each side of the road.

d. Left Mixing Width (MXWL) = 0, due to no canyon or bluff effects.

Mixing width (left or right) is defined, according to the model literature, as the distance from obstructions on the side of the roadway to the centerline of the roadway. Mixing width thus gives a simulation of canyon (or bluff effects), acting as a barrier of which no emission can occur beyond.

BY: S.W. DATE: 12/5/95
CKD BY: RB DATE: 12/14/95

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Carbon Monoxide Hot Spots Analysis

- e. Right Mixing Width (MXWR) = 0, due to no canyon or bluff effects.
- f. Source Height (H) = 0, since roadway is at grade and the height of exhaust has negligible effects on CO emissions.
- g. Link Endpoints (X1, Y1) and (X2, Y2) are listed in Table 2.
- h. Average Vehicle Speed (SPD) = 55 mph.
- i. Idle Emission Factor (EFI) = 1.7 grams /vehicle-minute was generated by EMFAC7PC from original calculations dated 7/12/95, (see Attachment B) and assumed relatively constant.
- j. Hourly Departure Volumes (VPHO) (See Table 3) does not include SR126 straight through traffic. VPHO is defined as the vehicles per hour which pass straight through the intersection on this link, plus the vehicles which turn onto this link.
- k. Distance to Stop line from XL1 (STPL) = 498.4 meters, defined as the distance from (X1, Y1) to the intersection, assume no stopping occurs on this link, vehicles yield/stop and make left hand turn onto Toland. [500 - 3.3/2 = 498.4 meters]
- l. First Vehicle Idle Time (IDT1) listed in Table 3, based on revised traffic data (see Attachment A).
- m. Last Vehicle Idle Time (IDT2) = 0, assume no buildup of traffic queue.
- n. Vehicles / Lane / Cycle (NCYC) = 0, since there is no stop light. NCYC is defined as the average number of vehicles handled per signal cycle per lane. = 1 for program run to avoid a program error.
- o. Vehicles Delayed / Lane / Cycle (NDLA) = 0, since there is no stop light cycle. NDLA is defined as average number of vehicles delayed per light cycle per lane.
- p. Deceleration Time (DCLT) = 17 seconds, defined as the time required for a vehicle traveling SPD, mph, to come to a stop, such that,

$$DCLT = SPD \text{ (mph)} / \text{Deceleration Rate} \text{ ** (mph per second)}$$

****Deceleration Rates :**

(from CALINE 4 literature, Attachment C):

15 - 0 mph = 5.3 mphps

30 - 0 mph = 4.6 mphps

(extrapolated, assume linear):

45 - 0 mph = 3.9 mphps

60 - 0 mph = 3.2 mphps

$$\text{Thus, } DCLT = 55 / 3.2 = \underline{17 \text{ seconds}}$$

- q. Acceleration Time (ACCT) = 18 seconds, defined as the time required for a vehicle to accelerate to SPD, mph from a stop, such that,

$$ACCT = SPD \text{ (mph)} / \text{Acceleration Rate} \text{ *** (mph per second)}$$

BY: S.W. DATE: 12/5/95
CKD BY: [Signature] DATE: 12/15/95

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Carbon Monoxide Hot Spots Analysis

*****Acceleration Rates:**

(from CALINE 4 literature, Attachment C):

0 - 15 mph = 3.3 mphps

0 - 30 mph = 3.3 mphps

(extrapolated, assume linear): 0 - 45 mph = 3.0 mphps

0 - 60 mph = 3.0 mphps

Thus, DCLT = $55 / 3.0 = 18$ seconds

2. Link 2: 126 WB

- a. Vehicles per Hour (VPH) (See Table 3)
- b. Emission Factor (EF) (See Table 3)
- c. Roadway Width (W) = 12.6 meters
- d. Left Mixing Width (MXWL) = 0, due to no canyon or bluff effects.
- e. Right Mixing Width (MXWR) = 0, due to no canyon or bluff effects.
- f. Source Height (H) = 0, since roadway is at grade and the height of exhaust has negligible effects on CO emissions.
- g. Link Endpoints (X1, Y1) and (X2, Y2) are listed in Table 2.
- h. Average Vehicle Speed (SPD) = 55 mph.
- i. Idle Emission Factor (EFI) = 1.7 grams /vehicle-minute
- j. Hourly Departure Volumes (VPHO) (See Table 3) does not include SR126 straight through traffic.
- k. Distance to Stop line from XL1 (STPL) = $500 - 3.3/2 = 498.4$ meters., assume no stopping occurs on this link, vehicles yield/stop and make left hand turn onto Toland .
- l. First Vehicle Idle Time (IDT1) listed in Table 3, based on revised traffic data (see Attachment A).
- m. Last Vehicle Idle Time (IDT2) = 0 , assume no buildup of traffic queue.
- n. Vehicles / Lane / Cycle (NCYC) = 0 = 1 for program run
- o. Vehicles Delayed / Lane / Cycle (NDLA) = 0 = 1 for program run
- p. Deceleration Time (DCLT) = 17 seconds
- q. Acceleration Time (ACCT) = 18 seconds

3. Link 3: TOLAND NE

- a. Vehicles per Hour (VPH) = 0 = 1 for program run (See Table 3).
- b. Emission Factor (EF) (See Table 3) .
- c. Roadway Width (W) = 6.6 meters, one side of on-coming traffic.
- d. Left Mixing Width (MXWL) = 0 , due to no canyon or bluff effects.

BY: S.W. DATE: 12/5/95
CKD BY: RB DATE: 12/15/95

SHEET 10 OF 14

Carbon Monoxide Hot Spots Analysis

- e. Right Mixing Width (MXWR) = 0, due to no canyon or bluff effects.
 - f. Source Height (H) = 0, since roadway is at grade and the height of exhaust has negligible effects on CO emissions.
 - g. Link Endpoints (X1, Y1) and (X2, Y2) are listed in Table 2.
 - h. Average Vehicle Speed (SPD) = 35 mph.
 - i. Idle Emission Factor (EFI) = 1.7 grams /vehicle-minute.
 - j. Hourly Departure Volumes (VPHO) (See Table 3)
 - k. Distance to Stop line from XL1 (STPL) = 175 meters = [8.3 (ave distance between lanes on SR 126) + 166.5] = 174.8 meters.
 - l. First Vehicle Idle Time (IDT1) = 0, listed in Table 3.
 - m. Last Vehicle Idle Time (IDT2) = 0, assume no buildup of traffic queue.
 - n. Vehicles / Lane / Cycle (NCYC) = 0 = 1 for program run.
 - o. Vehicles Delayed / Lane / Cycle (NDLA) = 0 = 1 for program run
 - p. Deceleration Time (DCLT) = 0 = 8 seconds for program run.
 - q. Acceleration Time (ACCT) = 11 seconds = 35 mph / 3.3 mphs
- 4. Link 4: TOLAND SB Right Turn (RT)**
- a. Vehicles per Hour (VPH) (See Table 3)
 - b. Emission Factor (EF) (See Table 3)
 - c. Roadway Width (W) = 6.6 meters, one side is opposite traffic.
 - d. Left Mixing Width (MXWL) = 0, due to no canyon or bluff effects.
 - e. Right Mixing Width (MXWR) = 0, due to no canyon or bluff effects.
 - f. Source Height (H) = 0, since roadway is at grade and the height of exhaust has negligible effects on CO emissions.
 - g. Link Endpoints (X1, Y1) and (X2, Y2) are listed in Table 2.
 - h. Average Vehicle Speed (SPD) = 35 mph.
 - i. Idle Emission Factor (EFI) = 1.7 grams /vehicle-minute
 - j. Hourly Departure Volumes (VPHO) = 0 = 1 for program run.
 - k. Distance to Stop line from XL1 (STPL) = 163.2 meters = 166.5 - 3.3.

BY: S.W. DATE: 12/5/95
CKD BY: RB DATE: 12/16/95

SHEET 11 OF 14

Carbon Monoxide Hot Spots Analysis

l. First Vehicle Idle Time (IDT1) there is a stop sign for right turns onto SR126 WB. IDT1s are listed in Table 3, based on revised traffic data (see Attachment A).

m. Last Vehicle Idle Time (IDT2) = 0, assume no buildup of traffic queue.

n. Vehicles / Lane / Cycle (NCYC) = 0 = 1 for program run

o. Vehicles Delayed / Lane / Cycle (NDLA) = 0 = 1 for program run

p. Deceleration Time (DCLT) = 8 seconds = 35 mph / 4.6 mphps

q. Acceleration Time (ACCT) = 0 seconds, acceleration only into Link 1 = 11 seconds for program run.

5. Link 5: TOLAND SB Left Turn (LT)

a. Vehicles per Hour (VPH) (See Table 3)

b. Emission Factor (EF) (See Table 3)

c. Roadway Width (W) = 6.6 meters, one side is opposite traffic.

d. Left Mixing Width (MXWL) = 0, due to no canyon or bluff effects.

e. Right Mixing Width (MXWR) = 0, due to no canyon or bluff effects.

f. Source Height (H) = 0, since roadway is at grade and the height of exhaust has negligible effects on CO emissions.

g. Link Endpoints (X1, Y1) and (X2, Y2) are listed in Table 2.

h. Average Vehicle Speed (SPD) = 35 mph.

i. Idle Emission Factor (EFI) = 1.7 grams /vehicle-minute

j. Hourly Departure Volumes (VPHO) = 0 = 1 for program run.

k. Distance to Stop line from XL1 (STPL) = 163.2 meters = 166.5 - 3.3

l. First Vehicle Idle Time (IDT1) there is a stop sign for left turns onto SR126 EB. IDT1s are listed in Table 3, based on revised traffic data, see Attachment A.

m. Last Vehicle Idle Time (IDT2) = 0, assume no buildup of traffic queue.

n. Vehicles / Lane / Cycle (NCYC) = 0 = 1 for program run

o. Vehicles Delayed / Lane / Cycle (NDLA) = 0 = 1 for program run

p. Deceleration Time (DCLT) = 8 seconds = 35 mph / 4.6 mphps

q. Acceleration Time (ACCT) = 0 seconds, acceleration only into Link 1 = 11 seconds for program run.

BY: S.W. DATE: 12/5/95
CKD BY: RB DATE: 12/15/95

SHEET 12 OF 14

Carbon Monoxide Hot Spots Analysis

3.1.2 Run 2: At Grade Road with Straight Through Traffic, SR 126

The following input parameters apply to the peak morning hour and peak evening cases. Where different input parameters vary for peak hours, see Table 3, as referenced below.

1. Link 1: 126 EB

- a. Vehicles per Hour (VPH) (See Table 3)
- b. Emission Factor (EF) (See Table 3)
- c. Roadway Width (W) = 12.6 meters
- d. Left Mixing Width (MXWL) = 0, due to no canyon or bluff effects.
- e. Right Mixing Width (MXWR) = 0, due to no canyon or bluff effects.
- f. Source Height (H) = 0, since roadway is at grade and the height of exhaust has negligible effects on CO emissions.
- g. Link Endpoints (X1, Y1) and (X2, Y2) are listed in Table 2.
- h. Average Vehicle Speed (SPD) = 55 mph.
- i. Idle Emission Factor (EFI) = 0, no idling occurs, vehicles only cruise at SPD.
- j. Hourly Departure Volumes (VPHO) = 0, no intersection exists for this link.
- k. Distance to Stop line from XL1 (STPL) = 0, no stopping occurs on this link.
- l. First Vehicle Idle Time (IDT1) = 0 no idling occurs, vehicles only cruise at SPD.
- m. Last Vehicle Idle Time (IDT2) = 0, no traffic queue
- n. Vehicles / Lane / Cycle (NCYC) = 0, since there is no stop light.
- o. Vehicles Delayed / Lane / Cycle (NDLA) = 0, since there is no stop light cycle.
- p. Deceleration Time (DCLT) = 0 seconds.
- q. Acceleration Time (ACCT) = 0 seconds.

2. Link 2: 126 WB

- a. Vehicles per Hour (VPH) (See Table 3)
- b. Emission Factor (EF) (See Table 3)
- c. Roadway Width (W) = 12.6 meters
- d. Left Mixing Width (MXWL) = 0, due to no canyon or bluff effects.
- e. Right Mixing Width (MXWR) = 0, due to no canyon or bluff effects.
- f. Source Height (H) = 0, since roadway is at grade and the height of exhaust has negligible effects on CO emissions.
- g. Link Endpoints (X1, Y1) and (X2, Y2) are listed in Table 2.
- h. Average Vehicle Speed (SPD) = 55 mph.
- i. Idle Emission Factor (EFI) = 0, no idling occurs, vehicles only cruise at SPD.

Carbon Monoxide Hot Spots Analysis

- j. Hourly Departure Volumes (VPHO) = 0, no intersection exists for this link.
- k. Distance to Stop line from XL1 (STPL) = 0, no stopping occurs on this link.
- l. First Vehicle Idle Time (IDT1) = 0 no idling occurs, vehicles only cruise at SPD.
- m. Last Vehicle Idle Time (IDT2) = 0, no traffic queue
- n. Vehicles / Lane / Cycle (NCYC) = 0, since there is no stop light.
- o. Vehicles Delayed / Lane / Cycle (NDLA) = 0, since there is no stop light cycle.
- p. Deceleration Time (DCLT) = 0 seconds.
- q. Acceleration Time (ACCT) = 0 seconds.
- 3. Link 3: TOLAND NB - Not Applicable
- 4. Link 4: TOLAND SB - Not Applicable
- 5. Link 5: TOLAND SB - Not Applicable

4.0 CALCULATIONS

4.1 Emission Factor Calculation Example

1. The following is a sample calculation of the emission factor for traffic traveling on SR126 at 55 mph. See Attachment B, Table B.1 for detailed calculations.

LIGHT DUTY AUTOS:

- Summertime Emission factor @ 75°F (EMFAC7F1.1) = 1.24 g/mi
- Wintertime Emission factor @ 50°F (EMFAC7F1.1) = 1.23 g/mi
 - Correct winter EF to 75°F = $\left[\frac{75°F + 459.67}{50°F + 459.67} \right] \times 1.23 = 1.29 \text{ g/mi}$
- Average Summertime and Wintertime EFS and correct to 60°F (15.5°C as used in CALINE4):

$$\frac{(1.24 + 1.29)}{2} \times \left[\frac{60°F + 459.67}{75°F + 459.67} \right] = \underline{1.23 \text{ g/mi}}$$

0.972
- Multiply average EF by the fraction of light duty autos in the mix of traffic under consideration:

$$(61.0\%) / 100 \times 1.23 \text{ g/mi} = \underline{\underline{0.75 \text{ g/mi}}}$$
- Light duty, Medium duty, and heavy duty truck EFS were calculated the same as shown above to obtain the following:
 - Light Duty Trucks = 0.52 g/mi
 - Med. Duty Trucks = 0.09 g/mi
 - HVY. Duty Trucks = 0.28 g/mi
- The total (weighted) average emission factor was obtained as follows:

$$\Sigma = 0.75 + 0.52 + 0.09 + 0.28 = \underline{\underline{1.64 \text{ g/mi}}}$$

BY: S.W. DATE: 12/5/95
CKD BY: RB DATE: 12/15/95

SHEET 14 OF 14

Carbon Monoxide Hot Spots Analysis

4.2 CALINE 4 CO Emissions Calculation.

1. Table 1 shows the results of the computer modeling. Runs 1 and 2 were summed together to obtain total CO emissions for the morning and evening peak hour cases.
2. Attachment B contains the file reports which show input parameters.

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/12/95 Subject Attachment A Sheet No. A1 of 2
Chkd. By _____ Date _____ CO Hot Spots Analysis Proj. No. 95-105

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Attachment A
YEAR 2015 TRAFFIC VOLUMES



ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/12/95 Subject Attachment B Sheet No. B-1 of 11

Chkd. By _____ Date _____ CO Hot Spots Analysis Proj. No. 95-105

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Attachment B

(1.) Emission Factor Calculation

Results (EMFAC7 PC)

(2) CALINE4 Data inputs

File TolandAM = Morning Peak hour Run

File TolandEPM = Early Evening Peak
hour Run

File TolandPM = Evening Peak Hour
Run



B4: SWL DATE: 12/5/95
 CKD BY: _____ DATE: _____

SHEET B-2 OF 11

Table B.1
 EMFAC EMISSION FACTORS (Grams/Mile)
 YEAR: 2020-SUMMERTIME & WINTERTIME

Velocity (mph)	Pollutant Name	SUMMERTIME RUNNING IM EXHAUST EMISSION FACTORS AT 75 DEG F						WINTERTIME RUNNING IM EXHAUST EMISSION FACTORS AT 50 DEG F					
		LIGHT DUTY AUTOS Catalytic	LIGHT DUTY TRUCKS Catalytic	MEDIUM DUTY TRUCKS Catalytic	HEAVY DUTY TRUCKS DIESEL	LIGHT DUTY AUTOS Catalytic	Corrected to 75 deg. Catalytic	LIGHT DUTY TRUCKS Catalytic	Corrected to 75 deg. Catalytic	MEDIUM DUTY TRUCKS Catalytic	Corrected to 75 deg. Catalytic	HEAVY DUTY TRUCKS DIESEL	Corrected to 75 deg. Catalytic
55 (Straight through traffic on SR 126)	CO	1.24	1.72	2.24	6.53	1.23	1.29	1.71	1.79	2.23	2.34	6.53	6.85
55 (Turning onto and off of Toland Road)	CO	1.24	1.72	2.24	6.53	1.23	1.29	1.71	1.79	2.23	2.34	6.53	6.85
35 (All traffic on Toland)	CO	1.07	1.53	1.99	7.38	1.07	1.12	1.52	1.59	1.98	2.08	7.38	7.74

NOTES:

- (1) By the year 2015, straight through truck traffic on SR 126 is estimated to decrease to 8.5% from the existing 11.5% observed truck traffic volume (Draft Environmental Impact Report Toland Road Expansion and Landfill Closure/Postclosure, Section 3.11.2, Table 3.11.2, and Figure 3.11.6, prepared by Environmental Solutions, Inc., September 1995). The existing truck traffic is comprised of approximately 50% medium duty and 50% heavy duty types.
- (2) Percentages of traffic types for Toland Road were obtained from the revised traffic study shown in Attachment A. The breakdown of traffic types to the various shown duties were estimated using Table F.1, Projected "Proposed-Case" vehicle flow Transfer and Packer Trucks, Toland Road Expansion, from the Draft Environmental Impact Report, referenced in note 1.

Table B.1 (continued)
 EMFAC EMISSION FACTORS (grams/mile)
 YEAR: 2020-SUMMERTIME & WINTERTIME

Velocity (mph)	Pollutant Name	AVERAGE EMISSION FACTOR, CORRECTED TO 60 DEG						Weighted Average Emission Factors
		LIGHT DUTY AUTOS Catalytic	LIGHT DUTY TRUCKS Catalytic	MEDIUM DUTY TRUCKS DIESEL	HEAVY DUTY TRUCKS DIESEL			
55 (Straight through traffic on SR 126)	CO	% of Total Traffic	61.0	30.5	4.3 (1)	4.3 (1)		
		Apportioned Emission Factor	1.23	1.71	2.23	6.50		1.64
55 (Straight through traffic on SR 126)	CO	% of Total Traffic	23 (2)	12 (2)	6 (2)	59 (2)		
		Apportioned Emission Factor	1.23	1.71	2.23	6.50		4.46
35 (All traffic on Toland)	CO	% of Total Traffic	23 (2)	12 (2)	6 (2)	59 (2)		
		Apportioned Emission Factor	1.07	1.52	1.98	7.35		4.88

NOTES:

- (1) By the year 2015, straight through truck traffic on SR 126 is estimated to decrease to 8.5% from the existing 11.5% observed truck traffic volume (Draft Environmental Impact Report Toland Road Expansion and Landfill Closure/Postclosure, Section 3.11.2, Table 3.11.2, and Figure 3.11.6, prepared by Environmental Solutions, Inc., September 1995). The existing truck traffic is comprised of approximately 50% medium duty and 50% heavy duty types.
- (2) Percentages of traffic types for Toland Road were obtained from the revised traffic study shown in Attachment A. The breakdown of traffic types to the various shown duties were estimated using Table F.1, Projected "Proposed-Case" vehicle flow Transfer and Packer Trucks, Toland Road Expansion, from the Draft Environmental Impact Report, referenced in note 1.

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 12/5/95 Subject Calculation of Sheet No. B-A of 11

Chkd. By RB Date 12/15/95 Straight Through Traffic (126) Proj. No. 95-05
Type Percentages

Data From Fig 6 (Revised per Verbal Convers. w/ WPA Traffic Eng.)

		AM	EPM	PM
126 EB LT onto TOLAND	A	50 ✓	21 ✓	60 ✓
	B	28 X	18 X	6
126 WB RT onto TOLAND	A	0 ✓	1 ✓	1 ✓
	B	3 X	0 X	0
SBTOL RT OFF South TOLAND (TO 126 EB)	A	50 ✓	22 ✓	18 ✓
	B	0 X	20 X	49 ✓
LT OFF TOLAND (TO 126 WB)	A	50 ✓	1 ✓	1 ✓
	B	0 X	0 X	2 ✓

1. Obtain Subtotals of Peak hr traffic for each individual CASE A & B.

	AM	CASE A EPM	PM	Totals Traffic
TRAFFIC ON TOL.	50	21	60	133 on
• Sub totals	<u>0</u> 50	<u>-1</u> 22	<u>1</u> 61	
TRAFFIC OFF TOL.	50	22	18	97 off
• Subtot	<u>5</u> 55	<u>21</u> 23	<u>1</u> 19	
<u>CASE B</u>				
ON TOL	28	18	6	55 on
• Sub totals	<u>3</u> 31	<u>0</u> 18	<u>0</u> 6	
OFF TOL.	0	28	49	71 off
• Subtot	<u>0</u> 0	<u>28</u> 20	<u>49</u> 51	

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 12/5/95 Subject Calculation of Sheet No. B-6 of 11

Chkd. By RB Date 12/15/95 Straight Through Traffic Proj. No. 95-105

2. TOTAL During 3 peak hours

CASE A 230 65% → 65%

CASE B 126 35% → 35%

TOT 356

On Toland use following % of traffic types

- 65% Commercial Packer & Delivery

• Assume 90% Heavy duty diesel (Table F.1)

• Assume 10% Med. duty delivery trucks (Table F.1)

→ Heavy duty diesel = $.9(65) = 59\%$

→ Med. duty = $.1(65) = 6\%$

- 35% Employees, self haul & VRSD

• Assume 65% Light Auto (or equivalent)

for employees & VRSD traffic (Table F.1)

• Assume 35% as Light duty truck

for self haul trucks (Table F.1)

→ Light auto $(.65)(35\%) = 23\%$

→ Light duty truck $(.35)(35\%) = 12\%$

35% Tol

EMFAC Emission Factors

YEAR 2020

Table B.2

EMFAC7PC EMISSION FACTORS
 VERSION : EMFAC7D ...11/88

YEAR : 2015 TEMPERATURE : 60
 PERCENT VMT COLD : 10.0 PERCENT VMT HOT : 30.0

PM10 Percent Exhaust : 99.1 Tire Wear : 40.0
 Sulfur Content Leaded : 450.0 ppm Unleaded : 200.0 ppm
 Sulfur Content Diesel : 0.280 %

Speed	GRAMS PER MILE		
	TOG	CO	NOX
35 MPH	1.64	6.27	7.44
55 MPH	1.18	4.25	10.14

Idle Emission Factors — Use

TOG	0.40	Gr/Min	Fuel Use	15.9	MPG
→ CO	1.70	Gr/Min	PM10	0.779	GR/MILE
NOx	1.10	Gr/Min	Sox	1.610	Gr/Mile

B4 SW DATE: 12/15/95
 CKD BY RD DATE: 12/15/95 RUN 1 PEAK MORNING HOUR

SHEET B-8 OF 11

REPORT FOR FILE : TOLANDAM

1. Site Variables

U= 0.5 M/S ZO= 198.0 CM
 BRG= 0.0 DEGREES VD= 0.0 CM/S
 CLASS= G STABILITY VS= 0.0 CM/S
 MIXH= 1000.0 M AMB= 0.0 PPM
 SIGTH= 5.0 DEGREES TEMP= 15.5 DEGREE (C)

2. Link Description

LINK DESCRIPTION	* X1	* Y1	LINK COORDINATES (M) X2	* Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. 126 EB	0	0	1000	0	IN	78	4.5	0.3	12.6
B. 126 WB	1000	13	0	13	IN	3	4.5	0.3	12.6
C. TOLAND NB	502	17	502	167	IN	1	4.9	3.0	6.6
D. TOLAND SB RT	498	167	497	17	IN	50	4.9	3.0	6.6
E. TOLAND SB LT	498	167	499	17	IN	5	4.9	3.0	6.6

LINK	* L (M)	* R (M)	MIXW	STPL (M)	DCLT (SEC)	ACCT (SEC)	SPD (MPH)	NCYC	NDLA	VPHO	EFI (G/MIN)	IDT1 (SEC)	IDT2 (SEC)
A.	0	0		498	17.0	18.0	55	1	1	5	1.7	19.0	0.0
B.	0	0		498	17.0	18.0	55	1	1	50	1.7	1.0	0.0
C.	0	0		175	8.0	11.0	35	1	1	81	1.7	0.0	0.0
D.	0	0		163	8.0	11.0	35	1	1	1	1.7	6.9	0.0
E.	0	0		163	8.0	11.0	35	1	1	1	1.7	298.0	0.0

3. Receptor Coordinates

RECEPTOR	1	X	Y	Z
		403	-37	1.3

BY SW DATE 12/5/95
 CKD BY RB DATE 12/15/95

RUN 2 PEAK MORNING HOUR

SHEET B-9 OF 11

REPORT FOR FILE : TOLAM126
 1. Site Variables

U= 0.5 M/S ZO= 198.0 CM
 BRG= 0.0 DEGREES VD= 0.0 CM/S
 CLASS= G STABILITY VS= 0.0 CM/S
 MIXH= 1000.0 M AMB= 0.0 PPM
 SIGTH= 5.0 DEGREES TEMP= 15.5 DEGREE (C)

2. Link Description

LINK DESCRIPTION	*	LINK COORDINATES (M)				*	TYPE	VPH	EF (G/MI)	H (M)	W (M)
		X1	Y1	X2	Y2						
A. 126 EB	*	0	0	1000	0	AG	1010	1.6	0.0	12.6	
B. 126 WB	*	1000	13	0	13	AG	1465	1.6	0.0	12.6	

LINK	*	MIXW		STPL (M)	DCLT (SEC)	ACCT (SEC)	SPD (MPH)	NCYC	NDLA	VPHO	EFI (G/MIN)	IDT1 (SEC)	IDT2 (SEC)
		L (M)	R (M)										
A.	*	0	0	0	0.0	0.0	0	0	0	0	0.0	0.0	0.0
B.	*	0	0	0	0.0	0.0	0	0	0	0	0.0	0.0	0.0

3. Receptor Coordinates

RECEPTOR	1	X	Y	Z
		403	-37	1.3

BY SLW DATE 12/15/95
 CKD BY RB DATE 12/15/95 RUN 1

PINK Evening Hours

REPORT FOR FILE : TOLANDPM
 1. Site Variables

U= 0.5 M/S ZO= 198.0 CM
 BRG= 0.0 DEGREES VD= 0.0 CM/S
 CLASS= G STABILITY VS= 0.0 CM/S
 MIXH= 1000.0 M AMB= 0.0 PPM
 SIGTH= 5.0 DEGREES TEMP= 15.5 DEGREE (C)

2. Link Description

LINK DESCRIPTION	* X1	* Y1	* X2	* Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. 126 EB	0	0	1000	0	IN	66	4.5	0.3	12.6
B. 126 WB	1000	13	0	13	IN	1	4.5	0.3	12.6
C. TOLAND NB	502	17	502	167	IN	1	4.9	3.0	6.6
D. TOLAND SB RT	498	167	498	17	IN	67	4.9	3.0	6.6
E. TOLAND SB LT	498	167	499	17	IN	3	4.9	3.0	6.6

LINK	* L (M)	* R (M)	STPL (M)	DCLT (SEC)	ACCT (SEC)	SPD (MPH)	NCYC	NDLA	VPHO	EFI (G/MIN)	IDT1 (SEC)	IDT2 (SEC)
A.	0	0	498	17.0	18.0	55	1	1	3	1.7	13.9	0.0
B.	0	0	498	17.0	18.0	55	1	1	67	1.7	1.0	0.0
C.	0	0	175	8.0	11.0	35	1	1	67	1.7	0.0	0.0
D.	0	0	163	8.0	11.0	35	1	1	1	1.7	6.4	0.0
E.	0	0	163	8.0	11.0	35	1	1	1	1.7	%298.0	0.0

3. Receptor Coordinates

RECEPTOR	X	Y	Z
1	403	-37	1.3

BY: S.W DATE: 12/5/95

CKD BY: RB DATE 12/15/95

RUN 2

PEAK EVENING HOUR

SHEET 6-11 OF 11

REPORT FOR FILE : TOLPM126

1. Site Variables

U=	0.5 M/S	ZO=	198.0 CM
BRG=	0.0 DEGREES	VD=	0.0 CM/S
CLASS=	G STABILITY	VS=	0.0 CM/S
MIXH=	1000.0 M	AMB=	0.0 PPM
SIGTH=	5.0 DEGREES	TEMP=	15.5 DEGREE (C)

2. Link Description

LINK DESCRIPTION	LINK COORDINATES (M)				* TYPE	VPH	EF (G/MI)	H (M)	W (M)
	X1	Y1	X2	Y2					
A. 126 EB	0	0	1000	0	AG	1665	1.6	0.0	12.6
B. 126 WB	1000	13	0	13	AG	1425	1.6	0.0	12.6

LINK	MIXW		STPL (M)	DCLT (SEC)	ACCT (SEC)	SPD (MPH)	NCYC	NDLA	VPHO	EFI (G/MIN)	IDT1 (SEC)	IDT2 (SEC)
	L (M)	R (M)										
A.	0	0	0	0.0	0.0	0	0	0	0	0.0	0.0	0.0
B.	0	0	0	0.0	0.0	0	0	0	0	0.0	0.0	0.0

3. Receptor Coordinates

RECEPTOR	1	X	Y	Z
		403	-37	1.3

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 12/15/95 Subject CO Hot Spots Analysis Sheet No. C-1 of 2

Chkd. By _____ Date _____ Proj. No. 95-105

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Attachment C

CALINE 4 Literature
Excerpts from Air Quality Analysis
AQAT-3, by Patrick C. Randall &
Arthur Diamond, State of
California Air Resource Board,
Stationary Source Division,
Issued 1989

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29



Vehicles Delayed/Lane/Cycle: 8 - This is the vehicle per lane per cycle multiplied by the red cycle time and divided by the total cycle time. (22)(24.5) sec / 70 sec. The ratio 24.5 / 70 represents the likelihood that a vehicle would have to stop assuming a uniform flow. For other flow configurations such as plug flow, a transportation model would be required.

Deceleration Time: 6.5 sec. - The time required for a vehicle traveling V miles per hour to come to a stop, may be calculated as follows:

$$T = V \text{ mph} / \text{Deceleration rate mphps}$$

→ *Values for Deceleration:

15 - 0 mph 5.3 mphps

30 - 0 mph 4.6 mphps

$$(30 \text{ mph} / 4.6 \text{ mphps} = 6.5 \text{ sec})$$

Acceleration Time: 9.1 sec. - To find the time required to accelerate a vehicle to a speed of V mph from a stop, use the following:

$$T = V \text{ mph} / \text{Acceleration rate mphps}$$

→ *Values for Acceleration:

0 - 15 mph 3.3 mphps

0 - 30 mph 3.3 mphps

$$(30 \text{ mph} / 3.3 \text{ mphps} = 9.1 \text{ sec})$$

Link Name: Almaden EB (Link 2)

Vehicles per Hour: 1286 vehicles

Emission Factor: 23.6 g/mile

Roadway Width: (two lanes) 12.3 m : 3.3 + 6 m

(Note: The mixing zones for EB and WB traffic will overlap.)

Left Mixing Width: 0

Right Mixing Width: 0

Source Height: 0

Link Endpoints: 0,100 400,100

Average Vehicle Speed: 30 mph

Idle Emission Factor: 36 g/min

*Transportation and Traffic Engineering Handbook. Institute of Traffic Engineers, Fourth Edition, 1976.

**B.2.1.2 - Offsite Emissions Calculation
(Proposed Expansion)**

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/28/95 Subject Off-site Emissions Sheet No. 1 of 6

Chkd. By RB Date 8/22/95 Calculation (PROPOSED) Proj. No. 95-105
EXPANSION

1.0 Purpose

1. The purpose of this calculation is to obtain the off-site vehicle traffic emissions (in pounds per day) of the criteria air pollutants listed below for air quality analysis:

- Nitrogen oxides (NO_x)
- Reactive organic compounds (ROCs)
[or reactive organic gases (ROGs)]
- Particulate matter with aerodynamic diameter less than or equal to 10 microns (PM_{10}), including tire wear,
- Sulfur oxides (SO_x)
- Carbon Monoxide (CO)

2.0 Methodology

1. Emissions were calculated in accordance with formulas listed in Table A.9.5 (Attachment A) and reduced as follows:

- NO_x & CO

$$EM = \left(\left[EF_{NO_x \text{ or } CO} \right] + \left[\cancel{CS_{NO_x \text{ or } CO}} \right] \times C + \left[\cancel{HS_{NO_x \text{ or } CO}} \right] \times H \right) VRT / 454$$

EM = EMISSIONS [lb/day]

$EF_{NO_x \text{ or } CO}$ = Running exhaust emission factor for NO_x or CO [g/mile]

$CS_{NO_x \text{ or } CO}$ = Cold start emission factors

C = % Cold start trips = assume 0

$HS_{NO_x \text{ or } CO}$ = Hot Start

H = % Hot start trips = assume 0

VRT = Total vehicle round trip distance (miles per day)

Conversion factor = 1 lb = 1/454 g
g \rightarrow lb

$$EM = EF_{NO_x \text{ or } CO} \times VRT / 454 \quad (EQ 1)$$

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/28/95 Subject Off-Site Emission Sheet No. 2 of 6
 Chkd. By RB Date 8/22/95 Calculator (AIR Proj. No. 95-105
Quality Analysis)

For ROG

$$EM = [EF_{ROG} + (CS_{ROG} \times C) + (HS_{ROG} \times H) + (S_{ROG}) + (D_{ROG})] \times VRT / 454$$

EF_{ROG} = Running exhaust emission factor for ROG (g/mile)

CS_{ROG}, C, HS_{ROG} = Same definition as above = assume 0

S_{ROG} = Hot Soak evaporative emission factor = assume 0

D_{ROG} = Diurnal evaporative emission factor = assume 0

$$EM = EF_{ROG} \times VRT / 454 \quad [\equiv EQ 2]$$

For PM10 (include tire wear)

$$EM = [EF_{PM10} + TW] \times VRT / 454 \quad (EQ 3)$$

EF_{PM10} = Running exhaust emission factor PM10 (g/mile)

TW = Running tire wear factor (g/mile)

For SO_x

$$EM = [EF_{SO_x}] \times VRT / 454 \quad (\equiv EQ 1)$$

EF_{SO_x} = Running exhaust emission factor SO_x [g/mile]

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/28/95 Subject Off-site Emission Sheet No. 3 of 6
Chkd. By RB Date 8/22/95 Calculation (Air Quality Analysis) Proj. No. 95-105

3.0. Given's / Assumptions

1. EMFAC emission factors for ROCs, CO.

NOx and PM10 were provided for summer and winter times, at ^(year 2020, latest year for EMFAC) temperatures of 75 °F and 50 °F, respectively. Temperature Correction factors T1 & T2 were obtained as followed:

$$^{\circ}K = 5/9 (^{\circ}F + 459.67)$$

$$^{\circ}K(75^{\circ}F) = 5/9(75 + 459.67) = 297^{\circ}K$$

$$^{\circ}K(60^{\circ}F) = 5/9(60 + 459.67) = 289^{\circ}K$$

$$^{\circ}K(50^{\circ}F) = 5/9(50 + 459.67) = 283^{\circ}K$$

$$T1 (50^{\circ}F \rightarrow 75^{\circ}F) = (297/283) = \underline{1.05}$$

$$T2 = (75^{\circ}F \rightarrow 60^{\circ}F) = (289/297) = \underline{0.97}$$

- Wintertime emission rates were multiplied by T1, then averaged with the summertime emission factors @ 75 °F
 - The average emission factors were corrected from 75 °F to 60 °F by multiplying it by T2.
 - Attachment B contains EMFAC7F emission factors.
2. Since SOx emission factors for year 2020 were not available, EMFAC emission factors for 2009 were obtained from the CEQA Air Quality Handbook (Attachment A)
 3. Analysis was conducted for moving vehicles only, therefore assumed zero emissions for stop/starts.
 4. Assume average velocity of traffic is 55 mph.
 5. Traffic volume and distribution is constant through landfill life.
 6. Conducted analysis for two scenarios
 - a) Scenario A: Proposed project with transfer and packer trucks
 - b. Scenario B: Worst Case with packer trucks only
 7. Vehicle types and vehicle miles per day were obtained from data in Attachment C.

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/28/95 Subject Off-site Emission Sheet No. 4 of 6
Chkd. By RB Date 8/22/95 Calculation (Air Proj. No. 95-105
Quality Analysis)

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4.0 Calculations

1. Table 1 lists summertime and wintertime EMFACTF running I/M exhaust emission factors at 75°F and 50°F, respectively. Table also shows the emission factors corrected for temperature (75°F) and averaged and corrected to 60°F. These average emission factors were used in Table 2 to calculate emissions.
2. Table 2 shows the results of the emission rate calculation described above.

Table 1
EMFAC7F EMISSION FACTORS
YEAR: 2020-SUMMERTIME & WINTERTIME AT 55 MPH

Pollutant Name	SUMMERTIME RUNNING IM EXHAUST EMISSION FACTORS AT 75 DEG F				WINTERTIME RUNNING IM EXHAUST EMISSION FACTORS AT 50 DEG F				AVERAGE EMISSION FACTOR CORRECTED TO 60 DEG				
	LIGHT DUTY AUTOS	LIGHT DUTY TRUCKS	HEAVY DUTY TRUCKS	HEAVY DUTY TRUCKS	LIGHT DUTY AUTOS	Corrected to 75 deg.	LIGHT DUTY TRUCKS	Corrected to 75 deg.	HEAVY DUTY TRUCKS	Corrected to 75 deg.	LIGHT DUTY AUTOS	LIGHT DUTY TRUCKS	HEAVY DUTY TRUCKS
	Catalytic	Catalytic	DESEL	DESEL	Catalytic	Corrected to 75 deg.	Catalytic	Corrected to 75 deg.	DESEL	Corrected to 75 deg.	Catalytic	Catalytic	DESEL
	0.26	0.50	13.31	13.31	0.32	0.34	0.61	0.64	13.31	13.96	0.29	0.55	13.25
FOG	0.03	0.04	1.37	1.37	0.03	0.03	0.04	0.04	1.37	1.44	0.03	0.04	1.36
PM10	0.01	0.01	0.97	0.97	0.01	0.01	0.01	0.01	0.97	1.02	0.01	0.01	0.97
PM10(Tire wear)(1)	0.20	0.20	0.66	0.66	0.20	0.20	0.20	0.20	0.66	0.66	0.20	0.20	0.64
CO	1.24	1.72	6.53	6.53	1.23	1.29	1.71	1.79	6.53	6.85	1.23	1.71	6.50
SOx(2)	0.05	0.05	0.28	0.28	0.05	0.05	0.05	0.05	0.28	0.29	0.05	0.05	0.28

NOTES:

- (1) Tire wear emission factors are assumed to be uncorrected by temperature.
- (2) Emission factor for SOx are not included in EMFAC7F. EMFAC emission factors for South Coast Air Quality Management District for the year 2009 were used. Emission factors for Light Duty Autos and Trucks were assumed to be 100% unleaded fueled (catalytic) and the emission factor for Heavy Duty Trucks is assumed coincide with AFB's heavy-heavy-duty vehicles, assumed to be 100% diesel fueled. (See attachment A)

TABLE 2
OFF-SITE EMISSIONS CALCULATIONS FOR AIR QUALITY ANALYSIS (PROPOSED EXPANSION)
TO TOLAND LANDFILL

VEHICLE TYPE	EMFAC VEHICLE DUTY CLASSIFICATION	TOTAL ROUND TRIP DISTANCE, VRT (MILES/DAY)	EMFAC EMISSION FACTORS, EF, AT 60 DEG F AND 50 MPH (GRAMS/MILE)						EMISSION RATES, EM (POUNDS PER DAY)					
			NOx	FOG	PM10	SOx	CO	NOx	FOG	PM10	SOx	CO		
SCENERIO A: TRANSFER AND PACKER TRUCKS														
Automobile	LDA	1,994	0.29	0.03	0.21	0.05	1.23	1.27	0.13	0.92	0.22	5.40		
Light Duty Truck	LDT	486	0.55	0.04	0.21	0.05	1.71	0.59	0.04	0.22	0.05	1.83		
Packer Trucks	HDT	2,844	13.25	1.36	1.61	0.28	6.50	83.03	8.55	10.07	1.75	40.73		
Transfer Truck	HDT	3,081	13.25	1.36	1.61	0.28	6.50	89.95	9.26	10.91	1.89	44.13		
Water Truck	HDT	126	13.25	1.36	1.61	0.28	6.50	3.68	0.38	0.45	0.08	1.80		
TOTAL EMISSIONS								178.51	18.36	22.57	3.99	93.89		
SCENERIO B: PACKER TRUCKS ONLY														
Automobile	LDA	1,994	0.29	0.03	0.21	0.05	1.23	1.27	0.13	0.92	0.22	5.40		
Light Duty Truck	LDT	5,352	0.55	0.04	0.21	0.05	1.71	6.53	0.47	2.48	0.59	20.13		
Packer Trucks	HDT	11,726	13.25	1.36	1.61	0.28	6.50	342.32	35.24	41.52	7.20	167.95		
Water Truck	HDT	126	13.25	1.36	1.61	0.28	6.50	3.68	0.38	0.45	0.08	1.80		
TOTAL EMISSIONS								353.80	36.21	45.36	8.08	195.28		

LDA= Light Duty Auto
LDT= Light Duty Truck
-HDT=Heavy Duty Truck

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/28/95 Subject Off-Site Emissions Sheet No. A1 of 8
Chkd. By _____ Date _____ Calc. Attachment A Proj. No. 95-105

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A Attachment A

CEQA Air Quality Handbook
Excerpts, South Coast
Air Quality Management
District

- Table A9-5; Estimating Emissions
from On-Road Vehicle Travel
(Pounds per Day)

- Table A9-5-L: EMFAC Emission
Factors for SCAQMD, Oxides
of Sulfur and Lead, Year 2009.



CEQA

air quality handbook



Prepared by:

South
Coast
Air
Quality
Management
District

April, 1993

INFORMATION
FOR
VEHICULAR EMISSIONS
IMPACT ON BACKGROUND LEVELS

**TABLE A9 - 5
ESTIMATING EMISSIONS FROM ON-ROAD VEHICLE TRAVEL
(Pounds Per Day)******

(The highest of the Daily VMT, ADT, NOV and Speed Values have to be selected between Weekdays and Weekends. Emission Factors have to be selected from Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for Passenger Vehicles and from A9 - 5 - K - 1 through A9 - 5 - K - 10 for Trucks Depending Upon which County the Project is Located in, and Year (Build-out or Construction))

$$E^* = \{(D \times F \times Y \times G) \times (H, \text{ or } I)\} / \{454\} \quad \text{for SOx \& Pb; AND,}$$

$$E^{**} = \{[(D \times F \times Y \times G) \times (N)] + [(D \times F \times Y \times G) \times (O)]\} / \{454\}$$

for PM10; and, for CO and NOx see next page.

Where,

- D = The project size in square feet, number of units, number of flights, etc.
- F = The highest of the weekday and weekend trips (Use two-way or round trips to estimate daily emissions) rate in same unit as the value for "D".
(Use Institute of Transportation Engineers (ITE) manual (latest edition), or traffic impact analysis (TLA) data, or defaults in Table A9 - 5 - A - 1, or defaults in Table A9 - 5 - A - 2.)
- Y = For daily impacts use 1.0. Otherwise, use number of work-days (65 to 91) in a quarter.
- G = The highest trip-length of the weekday or weekend in miles.
(Use ITE Manual (latest edition), TLA data or defaults in Table A9 - 5 - D and Table A9 - 5 - E.)

Do not subtract 3.59 miles from estimated trip-length when calculating CO or NOx emissions from running exhaust emissions.

- E* = Emissions of SOx and Pb (lead) in pounds per day from on-road vehicle travel
- H***** = SOx: Adjusted using "Burden" output to obtain vehicle miles traveled based emission factors. There are no evaporative running losses associated with SOx.
(See Table A9 - 5 - L for passenger vehicles and trucks.)
- I***** = Pb (Lead): Adjusted using "Burden" output to obtain vehicle miles traveled based emission factors. There are no evaporative running losses associated with Pb.
(See Tables A9 - 5 - L for passenger vehicles and trucks.)
- E** = Emissions of PM10 in pounds per day from on-road vehicle travel
- N***** = PM10: EMFAC7 running exhaust factor. There are no evaporative running losses associated with PM10.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)
- O***** = PM10: EMFAC7 running tire-wear factor. There are no evaporative running losses associated with PM10.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

***** Use *AM Peak Speeds* to select emission factors for CO and NOx; use *Off Peak Speeds* to select emission factors for ROCs; use *PM Peak Speeds* for SOx, PM10 and Pb (Lead).

Table A9 - 5 (Cont.)

(The highest of the Daily VMT, ADT, NOV and Speed Values have to be selected between Weekdays and Weekends. Emission Factors have to be selected from Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for Passenger Vehicles and from A9 - 5 - K - 1 through A9 - 5 - K - 10 for Trucks Depending Upon which County the Project is Located in, and Year (Build-out or Construction))

$$E^{***} = \frac{[(D \times F \times Y \times G) \times (J \text{ or } K)] + [(D \times F \times Y \times W) \times (L1, \text{ or } M1)] + [(D \times F \times Y \times Z) \times (L2, \text{ or } M2)]}{454}$$

for CO, and NOx;
and, See next page for ROCs.

Where,

- D = The project size in square feet, number of units, number of flights, etc.
- F = The highest of the weekday and weekend trips (Use 2 way or round trips to estimate daily emissions) rate in same unit as the value for "D"
(Use ITE manual (latest edition), TLA data or defaults in Table A9 - 5 - A - 1 or Table A9 - 5 - A - 2.)
- Y = For daily impacts use 1.0. Otherwise, use number of work-days (65 to 91) in a quarter.
- G = The highest of the weekday or weekend trip-length in miles.
(Use ITE Manual (latest edition), TLA data or defaults in Table A9 - 5 - D and Table A9 - 5 - E.)

Do not subtract 3.59 miles from estimated trip-length when calculating carbon monoxide or oxides of nitrogen emissions from running exhaust emissions. Because cold and hot starts were determined using 3.59 miles traveling distance, in the past, many persons were subtracting 3.59 miles from the estimated trip-length. The District recommends not to do that for running exhaust emissions using emission factors included in this handbook.

- E*** = Emissions of carbon monoxide and oxides of nitrogen in pounds per day from on-road vehicle travel
- J = Carbon Monoxide or CO: EMFAC7 Running exhaust emission factors. There are no evaporative running losses associated with CO.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)
- K = Oxides of Nitrogen or NOx: EMFAC7 Running exhaust emission factors. There are no evaporative running losses associated with NOx.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

EMFAC start-ups do not include evaporative running losses.
Estimate the cold start emissions only for those daily trips which are associated with start or re-start of the vehicles one or more hours after the engine was previously turned off. Use 0.0, if not applicable.

- W = Percent cold start trips. *(If unknown, use Table A9 - 5 - M to determine percent cold start trips.)*
- L1 = Carbon Monoxide: EMFAC7 Cold start emission factors.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)
- M1 = Oxides of Nitrogen : EMFAC7 Cold start emission factors
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

Estimate the hot start emissions only for those daily trips which are associated with re-start of the vehicles within less than one hour. Use 0.0, if not applicable.

- Z = Percent hot start trips. *(Use ITE Manual or TLA. If unknown, use Table A9 - 5 - M to determine percent hot start trips.)*
- L2 = Carbon Monoxide: EMFAC7 Hot start emission factors
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)
- M2 = Oxides of Nitrogen : EMFAC7 Hot start emission factors
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

TABLE A9 - 5 (Cont. from Previous Page)

(The highest of the Daily VMT, ADT, NOV and Speed Values have to be selected between Weekdays and Weekends. Emission Factors have to be selected from Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for Passenger Vehicles and from A9 - 5 - K - 1 through A9 - 5 - K - 10 for Trucks Depending Upon which County the Project is Located in, and Year (Build-out or Construction))

$$E^{****} = \frac{[D \times F \times Y \times G \times R] + [D \times F \times Y \times W \times S1] + [D \times F \times Y \times Z \times S2] + [D \times F \times Y \times T]}{+ \frac{[(D \times F \times Y)/(U) \times V]}{454}} \quad \text{for ROC.}$$

Where,

- D** = The project size in square feet, number of units, number of flights, etc.
F = The highest of the weekday or weekend trip (Use 2 way or round trips to estimate daily emissions) rate in same unit as the value for "D".
(Use ITE manual (latest edition), TLA data or defaults in Table A9 - 5 - A - 1 or Table A9 - 5 - A - 2.)
Y = For daily impacts use 1.0. Otherwise, use number of work-days (65 to 91) in a quarter.
G = The highest of the weekday or weekend trip-length in miles.
(Use ITE Manual (latest edition), TLA data or defaults in Table A9 - 5 - D and Table A9 - 5 - E.)

Do not subtract 3.59 miles from estimated trip-length when calculating carbon monoxide or oxides of nitrogen emissions from running exhaust and evaporative (R) emissions. Cold and hot starts are determined using 3.59 miles traveling distance. Therefore, in the past, 3.59 miles were removed from the estimated trip-length. The District recommends not to do such subtraction for running exhaust emissions using emission factors included in this handbook.

- E****** = Emissions of reactive organic compounds in pounds per day from on-road vehicle travel
R = Reactive organic gases or ROCs: EMFAC7 Running exhaust emission factors. There are evaporative running losses associated with ROCs.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

Estimate cold start emissions only for those daily trips which are associated with start or re-start of the vehicles one or more hours after the engine was previously turned off. EMFAC starts do not include evaporative losses.

- W** = Percent cold start trips. *(If unknown, use Table A9 - 5 - M to determine percent cold start trips.)*
S1 = Reactive organic gases: EMFAC7 Cold start emission factors.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

Estimate hot start emissions only for those daily trips which are associated with re-start of the vehicles within less than one hour. Use 0.0, if not applicable.

- Z** = Percent hot start trips. *(Use ITE Manual or TLA. If unknown, use Table A9 - 5 - M to determine percent hot start trips.)*
S2 = Reactive organic gases: EMFAC7 Hot start emission factors
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

Estimate hot soak emissions for all daily trips including all cold and hot start trips. Hot soak emissions do not include any exhaust emissions. Hot soak emissions are evaporative emissions after turning off the vehicle.

- T** = Reactive Organic Compounds: EMFAC7 Hot-Soak evaporative emission factors
 Estimate diurnal emissions for total number of vehicles addressed in this analysis including those vehicles with cold and hot start trips. Diurnal emissions are evaporative emissions caused by vehicle being parked in the areas where there is a potential for an increase in the ambient temperature. Temperature changes could result from parking the car in direct sunlight, or in shaded areas.
U = Number of trips that will occur per car per day or per car per quarter (65 to 91 days). If unknown, use 2.0 for two one-way trip, and use 1.0 for one one-way trip.
V = Reactive Organic Compounds: EMFAC7 Diurnal evaporative emission factor
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

The default tables are included on the following pages. The default tables provide information for 1987 and 2010. A straight line interpolation should be used to determine appropriate default between these two years. Each table provides a number of options based on the information known about the project. These tables are meant to provide guidance. Project proponent or local governments may have project specific information that could be used instead. For truck related default values please use EPA Report for the Contract Number A2-155-32 on Assessment of Heavy-Duty Gasoline and Diesel Vehicles in California: Population and Use Patterns, Prepared in July 1985 by Yuji Horie, Richard Rapoport of Pacific Environmental Services, Inc. Available at SCAQMD Library.

EMFAC EMISSION FACTORS FOR SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Oxides of Sulfur and Lead Emissions

Year	Vehicles with Gross Vehicle Weight up to 6,000 Pounds*** (grams per mile)						Vehicles with Gross Vehicle Weight 6,000 Pounds and Greater*** (grams per mile)					
	OXIDES of SULFUR			LEAD			OXIDES of SULFUR			LEAD		
	AREA1	AREA2	AREA3	AREA1	AREA2	AREA3	AREA1	AREA2	AREA3	AREA1	AREA2	AREA3
1991	0.07	0.07	0.07	0.00016	0.00016	0.00017	0.44	0.44	0.44	0.0017	0.0017	0.0017
1993	0.06	0.06	0.06	0.00011	0.00012	0.00012	0.33	0.33	0.33	0.0011	0.0011	0.0011
1995	0.06	0.06	0.06	N/A	N/A	N/A	0.32	0.32	0.32	0.0010	0.0010	0.0010
1997	0.06	0.06	0.06	N/A	N/A	N/A	0.31	0.31	0.31	0.0007	0.0007	0.0007
1999	0.05	0.05	0.05	N/A	N/A	N/A	0.30	0.30	0.30	0.0007	0.0007	0.0007
2001	0.05	0.05	0.05	N/A	N/A	N/A	0.30	0.30	0.30	0.0007	0.0007	0.0007
2003	0.05	0.05	0.05	N/A	N/A	N/A	0.30	0.30	0.30	0.0004	0.0004	0.0004
2005	0.05	0.05	0.05	N/A	N/A	N/A	0.29	0.29	0.29	0.0004	0.0004	0.0004
2007	0.05	0.05	0.05	N/A	N/A	N/A	0.28	0.28	0.28	0.0004	0.0004	0.0004
2009	0.05	0.05	0.05	N/A	N/A	N/A	0.28	0.28	0.28	0.0004	0.0004	0.0004

Emissions (pounds per day) = (*VMT x EMISSION FACTOR)/454

*VMT = Vehicle Miles Traveled per Day

- Vehicle Miles Traveled (VMT) or Average Daily Trips (ADT)-weighted emission factors:
Includes VMT or ADT from diesel-fueled vehicles (33.33%), gasoline-fueled vehicles equipped with catalyst (46.02%), and gasoline-fueled vehicles not equipped with catalyst (20.65%).
- Number of Vehicles (NOV)-weighted emission factors:
Includes NOV from diesel-fueled vehicles (33.33%), gasoline-fueled vehicles equipped with catalyst (37.74%), and gasoline-fueled vehicles not equipped with catalyst (28.93%).
- Vehicles with gross vehicle weight 6,001 pounds and up:
Includes ARB's medium-duty and light/heavy-duty, medium/heavy-duty and heavy/heavy-duty vehicles, e.g.: construction and demolition materials hauling trucks. (SG10HD29.WK1)

Attachment A
Sheet A8 of 8
Source:
CEQA AIR
QUALITY HANDBOOK
South Coast
Air Quality
Management
District,
April 1993.

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/28/95 Subject Off-Site Emissions Sheet No. 81 of 5
Chkd. By _____ Date _____ Calc. Attachment B Proj. No. 95-105

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Attachment B

- EMFACTF Emission Factors at 75°F
- (1) Year 2020 - Summer time
 - (2) Year 2020 - Wintertime

Run dates 7/20/95



TABLE 1: SUMMERTIME RUNNING I/M EXHAUST EMISSION FACTORS AT 75 DEG F

POLLUTANT NAME: TOTAL ORGANIC GASES SPEED MPH	LIGHT DUTY AUTOS			LIGHT DUTY TRUCKS			UNITS: GRAMS PER MILE MD. DUTY TRUCKS			HEAVY DUTY TRUCKS			URBAN BUS		MCY	
	NCAT	CAT	DIESEL	NCAT	CAT	DIESEL	NCAT	CAT	DIESEL	NCAT	CAT	DIESEL	CAT	DIESEL	DIESEL	ALL
5	0.00	0.17	0.99	0.00	0.27	0.00	0.00	0.96	5.29	2.17	5.73	10.98	9.47			
10	0.00	0.08	0.78	0.00	0.13	0.00	0.00	0.48	3.47	1.42	4.50	8.62	4.99			
15	0.00	0.06	0.62	0.00	0.09	0.00	0.00	0.33	2.37	0.97	3.61	6.92	3.52			
20	0.00	0.05	0.51	0.00	0.08	0.00	0.00	0.28	1.69	0.69	2.96	5.68	2.85			
25	0.00	0.04	0.43	0.00	0.07	0.00	0.00	0.25	1.25	0.40	2.48	4.76	2.44			
30	0.00	0.04	0.37	0.00	0.07	0.00	0.00	0.24	0.97	0.40	2.13	4.08	2.13			
35	0.00	0.04	0.32	0.00	0.06	0.00	0.00	0.22	0.78	0.32	1.86	3.58	1.88			
40	0.00	0.03	0.29	0.00	0.05	0.00	0.00	0.19	0.66	0.27	1.67	3.20	1.70			
45	0.00	0.03	0.26	0.00	0.05	0.00	0.00	0.17	0.57	0.24	1.53	2.93	1.60			
50	0.00	0.03	0.25	0.00	0.04	0.00	0.00	0.15	0.52	0.22	1.42	2.75	1.56			
55	0.00	0.03	0.24	0.00	0.04	0.00	0.00	0.16	0.50	0.21	1.37	2.63	1.50			
60	0.00	0.04	0.23	0.00	0.06	0.00	0.00	0.21	0.50	0.20	1.34	2.57	1.32			
65	0.00	0.07	0.23	0.00	0.12	0.00	0.00	0.42	0.51	0.21	1.34	2.57	0.90			
POLLUTANT NAME: CARBON MONOXIDE SPEED MPH	LIGHT DUTY AUTOS			LIGHT DUTY TRUCKS			UNITS: GRAMS PER MILE MD. DUTY TRUCKS			HEAVY DUTY TRUCKS			URBAN BUS		MCY	
MPH	NCAT	CAT	DIESEL	NCAT	CAT	DIESEL	NCAT	CAT	DIESEL	NCAT	CAT	DIESEL	CAT	DIESEL	DIESEL	ALL
5	0.00	5.48	6.01	0.00	7.60	0.00	0.00	9.89	44.74	26.68	34.70	68.05	52.42			
10	0.00	3.31	4.15	0.00	4.40	0.00	0.00	5.73	29.77	17.75	23.93	46.92	25.20			
15	0.00	2.27	2.99	0.00	3.05	0.00	0.00	3.97	20.92	12.48	17.27	33.86	16.55			
20	0.00	1.72	2.26	0.00	2.37	0.00	0.00	3.08	15.54	9.27	13.04	25.57	12.69			
25	0.00	1.39	1.79	0.00	1.97	0.00	0.00	2.57	12.19	7.27	10.31	20.21	10.39			
30	0.00	1.19	1.48	0.00	1.71	0.00	0.00	2.23	10.11	6.03	8.53	16.72	8.72			
35	0.00	1.07	1.28	0.00	1.53	0.00	0.00	1.99	8.85	5.28	7.38	14.47	7.47			
40	0.00	1.00	1.16	0.00	1.40	0.00	0.00	1.83	8.01	4.89	6.69	13.11	6.59			
45	0.00	1.05	1.10	0.00	1.35	0.00	0.00	1.76	8.19	4.78	6.34	12.43	6.08			
50	0.00	1.09	1.09	0.00	1.42	0.00	0.00	1.85	8.28	4.94	6.29	12.34	5.84			
55	0.00	1.24	1.13	0.00	1.72	0.00	0.00	2.24	9.03	5.39	6.53	12.81	5.65			
60	0.00	1.66	1.23	0.00	2.55	0.00	0.00	3.31	10.42	6.21	7.10	13.92	5.07			
65	0.00	2.68	1.40	0.00	5.04	0.00	0.00	6.56	12.69	7.57	8.07	15.83	3.65			
POLLUTANT NAME: OXIDES OF NITROGEN SPEED MPH	LIGHT DUTY AUTOS			LIGHT DUTY TRUCKS			UNITS: GRAMS PER MILE MD. DUTY TRUCKS			HEAVY DUTY TRUCKS			URBAN BUS		MCY	
MPH	NCAT	CAT	DIESEL	NCAT	CAT	DIESEL	NCAT	CAT	DIESEL	NCAT	CAT	DIESEL	CAT	DIESEL	DIESEL	ALL
5	0.00	0.34	2.28	0.00	0.63	0.00	0.00	2.16	4.24	2.22	17.43	31.14	0.71			
10	0.00	0.25	1.89	0.00	0.47	0.00	0.00	1.61	4.45	2.34	14.46	25.83	0.64			
15	0.00	0.20	1.63	0.00	0.38	0.00	0.00	1.28	4.66	2.45	12.43	22.21	0.66			
20	0.00	0.17	1.45	0.00	0.31	0.00	0.00	1.07	4.88	2.56	11.07	19.78	0.71			
25	0.00	0.15	1.34	0.00	0.27	0.00	0.00	0.93	5.09	2.67	10.22	18.26	0.79			
30	0.00	0.14	1.28	0.00	0.26	0.00	0.00	0.88	5.31	2.79	9.77	17.46	0.87			
35	0.00	0.14	1.27	0.00	0.26	0.00	0.00	0.90	5.52	2.90	9.68	17.30	0.94			
40	0.00	0.15	1.30	0.00	0.29	0.00	0.00	0.99	5.74	3.01	9.94	17.76	0.99			
45	0.00	0.18	1.38	0.00	0.34	0.00	0.00	1.15	5.95	3.13	10.57	18.89	1.02			
50	0.00	0.21	1.53	0.00	0.41	0.00	0.00	1.39	6.17	3.24	11.55	20.82	1.08			
55	0.00	0.26	1.74	0.00	0.50	0.00	0.00	1.70	6.38	3.35	13.31	23.73	1.20			
60	0.00	0.32	2.06	0.00	0.61	0.00	0.00	2.08	6.60	3.46	15.75	28.13	1.48			
65	0.00	0.39	2.53	0.00	0.74	0.00	0.00	2.53	6.81	3.58	19.31	34.48	2.17			

TABLE 1 (CONTINUED): SUMMERTIME RUNNING I/M EXHAUST EMISSION FACTORS AT 75 DEC F

POLLUTANT NAME: EXHAUST PARTICULATES	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		MD. DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY ALL
	NCAT	DIESEL	NCAT	DIESEL	NCAT	CAT	NCAT	CAT	DIESEL	DIESEL	
SPEED MPH											
5	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
10	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
15	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
20	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
25	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
30	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
35	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
40	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
45	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
50	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
55	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
60	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
65	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01

POLLUTANT NAME: TIRE WEAR	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		MD. DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY ALL
	NCAT	DIESEL	NCAT	DIESEL	NCAT	CAT	NCAT	CAT	DIESEL	DIESEL	
SPEED MPH											
5	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
10	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
15	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
20	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
25	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
30	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
35	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
40	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
45	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
50	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
55	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
60	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
65	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10

TABLE 1: WINTERTIME RUNNING I/M EXHAUST EMISSION FACTORS AT 50 DEG F

POLLUTANT NAME: TOTAL ORGANIC GASES SPEED MPH	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS DIESEL	MCY ALL
	NCAT	CAT	NCAT	DIESEL	NCAT	DIESEL		
5	0.00	0.16	0.00	0.26	0.00	0.91	10.98	9.56
10	0.00	0.08	0.00	0.13	0.00	0.45	8.62	5.04
15	0.00	0.06	0.00	0.09	0.00	0.31	6.92	3.55
20	0.00	0.05	0.00	0.07	0.00	0.26	5.68	2.47
25	0.00	0.04	0.00	0.07	0.00	0.24	4.76	2.15
30	0.00	0.04	0.00	0.06	0.00	0.22	4.08	1.90
35	0.00	0.04	0.00	0.06	0.00	0.20	3.58	1.72
40	0.00	0.03	0.00	0.05	0.00	0.18	3.20	1.62
45	0.00	0.03	0.00	0.04	0.00	0.16	2.93	1.57
50	0.00	0.03	0.00	0.04	0.00	0.14	2.75	1.51
55	0.00	0.03	0.00	0.04	0.00	0.15	2.63	1.51
60	0.00	0.04	0.00	0.06	0.00	0.20	2.57	1.33
65	0.00	0.06	0.00	0.11	0.00	0.40	2.57	0.91
UNITS: GRAMS PER MILE								
MD. DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY		ALL
NCAT	CAT	NCAT	DIESEL	NCAT	DIESEL	NCAT	DIESEL	ALL
0.00	0.91	6.37	5.73	2.62	5.73	10.98	9.56	
0.00	0.45	4.17	4.50	1.71	4.50	8.62	5.04	
0.00	0.31	2.85	3.61	1.17	3.61	6.92	3.55	
0.00	0.26	2.03	2.96	0.62	2.96	5.68	2.47	
0.00	0.24	1.51	2.48	0.48	2.48	4.76	2.15	
0.00	0.22	1.16	2.13	0.39	2.13	4.08	1.90	
0.00	0.20	0.94	1.86	0.32	1.86	3.58	1.72	
0.00	0.18	0.79	1.67	0.28	1.67	3.20	1.62	
0.00	0.16	0.69	1.53	0.26	1.53	2.93	1.57	
0.00	0.14	0.63	1.43	0.25	1.43	2.75	1.51	
0.00	0.15	0.60	1.37	0.25	1.37	2.63	1.51	
0.00	0.20	0.60	1.34	0.25	1.34	2.57	1.33	
0.00	0.40	0.62	1.34	0.25	1.34	2.57	0.91	
UNITS: GRAMS PER MILE								
MD. DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY		ALL
NCAT	CAT	NCAT	DIESEL	NCAT	DIESEL	NCAT	DIESEL	ALL
0.00	9.87	54.25	34.70	32.36	34.70	68.05	52.97	
0.00	5.72	36.09	23.93	21.53	23.93	46.92	25.47	
0.00	3.96	25.37	17.27	15.13	17.27	33.86	16.72	
0.00	3.08	18.84	13.04	11.24	13.04	25.57	12.83	
0.00	2.56	14.79	10.31	8.82	10.31	20.21	10.50	
0.00	2.22	12.26	8.53	7.31	8.53	16.72	8.82	
0.00	1.98	10.74	7.38	6.40	7.38	14.47	7.55	
0.00	1.82	9.94	6.69	5.93	6.69	13.11	6.66	
0.00	1.76	9.71	6.34	5.79	6.34	12.43	6.14	
0.00	1.85	10.04	6.29	5.99	6.29	12.34	5.90	
0.00	2.23	10.95	6.53	6.53	6.53	12.81	5.71	
0.00	3.31	12.63	7.10	7.53	7.10	13.92	5.13	
0.00	6.54	15.39	8.07	9.18	8.07	15.83	3.68	
UNITS: GRAMS PER MILE								
MD. DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY		ALL
NCAT	CAT	NCAT	DIESEL	NCAT	DIESEL	NCAT	DIESEL	ALL
0.00	2.63	4.89	17.43	2.57	17.43	31.14	0.82	
0.00	1.96	5.14	14.46	2.70	14.46	25.83	0.74	
0.00	1.57	5.39	12.43	2.83	12.43	22.21	0.76	
0.00	1.30	5.63	11.07	2.96	11.07	19.78	0.83	
0.00	1.14	5.88	10.22	3.09	10.22	18.26	0.92	
0.00	1.07	6.13	9.77	3.22	9.77	17.46	1.01	
0.00	1.09	6.38	9.68	3.35	9.68	17.30	1.09	
0.00	1.21	6.63	9.94	3.48	9.94	17.76	1.14	
0.00	1.41	6.87	10.57	3.61	10.57	18.89	1.19	
0.00	1.70	7.12	11.65	3.74	11.65	20.82	1.25	
0.00	2.07	7.37	13.31	3.87	13.31	23.77	1.39	
0.00	2.53	7.62	15.75	4.00	15.75	28.13	1.72	
0.00	3.08	7.87	19.31	4.13	19.31	34.48	2.52	

EMFAC7F EMISSION FACTORS
 YEAR: 2020-WINTERTIME

RUN DATES: REPORT 07/20/95

TABLE 1 (CONTINUED): WINTERTIME RUNNING I/M EXHAUST EMISSION FACTORS AT 50 DEG F

POLLUTANT NAME: SPEED MPH	EXHAUST PARTICULATES		LIGHT DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY ALL
	NCAT	DIESEL	NCAT	DIESEL	NCAT	DIESEL	NCAT	DIESEL	
5	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01
10	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01
15	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01
20	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01
25	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01
30	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01
35	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01
40	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01
45	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01
50	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01
55	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01
60	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01
65	0.00	0.42	0.00	0.01	0.00	0.01	0.08	0.97	0.01

POLLUTANT NAME: SPEED MPH	TIRE WEAR		LIGHT DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY ALL
	NCAT	DIESEL	NCAT	DIESEL	NCAT	DIESEL	NCAT	DIESEL	
5	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10
10	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10
15	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10
20	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10
25	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10
30	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10
35	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10
40	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10
45	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10
50	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10
55	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10
60	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10
65	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.66	0.10

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/28/95 Subject Off-site Emissions Sheet No. 01 of 2
Chkd. By _____ Date _____ Calcs. - Mileage Info for Proj. No. 95-105
Alternatives

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Attachment C
Mileage Information for
Alternatives

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MILEAGE INFORMATION FOR ALTERNATIVES

FROM:	TO:	TOLAND	SIMI	CHIQUITA	SUNSHINE
OXNARD		23.7	23.7	44.1	56.7
FILLMORE		6.3	15.0	17.4	30.0
SANTA PAULA		4.3	23.7	26.0	38.6

Scenario A: PROPOSED PROJECT SCENARIO (TRANSFER AND PACKER TRUCKS)
Vehicles Miles Per Day

VEHICLE TYPE	LANDFILL			
	TOLAND	SIMI	CHIQUITA	SUNSHINE
Auto/self haul*	2,480	968	1,085	1,715
Packer trucks	2,844	2,844	5,292	6,804
Transfer trucks	3,081	3,081	5,733	7,371
Water trucks	126	n/a	n/a	n/a

→ Auto Light Duty Truck: 1994
486

Scenario B:

WORSE CASE SCENARIO (PACKER TRUCKS)
Vehicles Miles Per Day

VEHICLE TYPE	LANDFILL			
	TOLAND	SIMI	CHIQUITA	SUNSHINE
Auto/self haul*	7,346	5,918	10,212	13,488
Packer trucks	11,726	12,185	22,215	28,767
Transfer trucks	0	0	0	0
Water trucks	126	n/a	n/a	n/a

Auto Light Duty Truck: 1994
5352

* Only includes waste haul for Simi, Chiquita and Sunshine (i.e., does not include employees, VRSD staff or visitors. For comparison, Toland self haul only: Proposed Project= 250 mi, Worse Case=5,115 mi.

** Simi, Chiquita, Sunshine
"Auto/self haul" as shown is 100% light duty trucks.

yes - Packer & Transfer trucks
are both heavy duty
(you were right)

**B.2.1.3 - Offsite Emissions Calculation
(Alternatives Analysis)**

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/28/95 Subject Off-site Emissions Sheet No. 1 of 9
 Chkd. By RB Date 8/24/95 Calculation (Alternatives Analysis) Proj. No. 95-105

1.0 Purpose

1. The purpose of this calculation is to obtain the offsite vehicle traffic emissions (in pounds per day) of the criteria air pollutants listed below for analysis of alternatives to Toland Road landfill:

- a. Nitrogen oxides (NO_x)
- b. Reactive organic compounds (ROCs)
[or reactive organic gases (ROGs)]
- c. Particulate matter with aerodynamic diameter less than or equal to 10 microns (PM_{10}), including tire wear,
- d. Sulfur oxides (SO_x)
- e. Carbon Monoxide (CO)

2.0 Methodology

1. Emissions were calculated in accordance with formulas listed in Table A.9.5 (Attachment A) and reduced as follows:

$$EM = \left(\left[EF_{NO_x \text{ or } CO} \right] + \left[\cancel{CS_{NO_x \text{ or } CO}} \right] \times C + \left[\cancel{HS_{NO_x \text{ or } CO}} \right] \times H \right) VRT / 454$$

EM = EMISSIONS [lb/day]

$EF_{NO_x \text{ or } CO}$ = Running exhaust emission factor for NO_x or CO [g/mile]

$CS_{NO_x \text{ or } CO}$ = Cold start emission factors

C = % cold start trips = assume 0

$HS_{NO_x \text{ or } CO}$ = Hot Start

H = % Hot start trips = assume 0

VRT = Total vehicle round trip distance (miles per day)

Conversion Factor: 1 lb = 454 g
g → lb

$$EM = EF_{NO_x \text{ or } CO} \times VRT / 454 \quad (EQ 1)$$

ENVIRONMENTAL SOLUTIONS, INC.

By SLW Date 7/28/95 Subject Off-Site Emission Sheet No. 2 of 9

Chkd. By RB Date 8/25/95 Calculator Proj. No. 95-105

For ROG

$$EM = [EF_{ROG} + (CS_{ROG} \times C) + (HS_{ROG} \times H) + (S_{ROG}) + (D_{ROG})] \times VRT / 454$$

EF_{ROG} = Running exhaust emission factor for ROG (g/mile)

CS_{ROG}, C, HS_{ROG}, H \equiv Same definition as above - assume 0

S_{ROG} = Hot Soak evaporative emission factor = assume 0

D_{ROG} = Diurnal evaporative emission factor = assume 0

$$EM = EF_{ROG} \times VRT / 454 \quad [\equiv EQ 2]$$

FOR PM10 (include tire wear)

$$EM = [EF_{PM10} + TW] \times VRT / 454 \quad (EQ 3)$$

EF_{PM10} = Running exhaust emission factor PM10 (g/mile)

TW = Running tire wear factor (g/mile)

FOR SO_x

$$EM = [EF_{SO_x}] \times VRT / 454 \quad (\equiv EQ 1)$$

EF_{SO_x} = Running exhaust emission factor SO_x (g/mile)

ENVIRONMENTAL SOLUTIONS, INC.

By SLW Date 7/28/05 Subject Off-site Emission Sheet No. 3 of 9

Chkd. By RB Date 8/25/05 Calculation Proj. No. 95-105

3.0. Given's / Assumptions

1. EMFAC emission factors for ROC. CO. NOX, and PM10 were provided, for summer and winter times, at ^(year 2020, latest year for EMFAC) temperatures of 75 °F and 50 °F, respectively. Temperature Correction Factors T1 & T2 were obtained as followed:

$$^{\circ}K = 5/9 (^{\circ}F + 459.67)$$

$$^{\circ}K(75^{\circ}F) = 5/9(75 + 459.67) = 297^{\circ}K$$

$$^{\circ}K(60^{\circ}F) = 5/9(60 + 459.67) = 289^{\circ}K$$

$$^{\circ}K(50^{\circ}F) = 5/9(50 + 459.67) = 283^{\circ}K$$

$$T1 (50^{\circ}F \rightarrow 75^{\circ}F) = (297/283) = \underline{1.05}$$

$$T2 = (75^{\circ}F \rightarrow 60^{\circ}F) = (289/297) = \underline{0.97}$$

- Wintertime emission rates were multiplied by T1, then averaged with the summertime emission factors @ 75 °F
 - The average emission factors were corrected from 75 °F to 60 °F by multiplying it by T2.
 - Attachment B contains EMFACTF emission factors.
2. Since SOx emission factors for year 2020 were not available, EMFAC emission factors for 2009 were obtained from the CEQA Air Quality Handbook (Attachment A)
 3. Analysis was conducted for moving vehicles only, therefore assumed zero emissions for stop/starts.
 4. Assume average velocity of traffic is 55 mph.
 5. Traffic volume and distribution is constant through landfill life.
 6. Conducted analysis for two scenarios
 - a) Scenario A: Proposed project with transfer and packer trucks
 - b) Scenario B: Worst Case with packer trucks only
 7. Vehicle types and vehicle miles per day were obtained from data in Attachment C for vehicles for waste haul.

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/28/95 Subject Off-site Emission Sheet No. 4 of 9
Chkd. By RB Date 8/25/95 Calculations Proj. No. 95-105

3.0 Givens / Assumptions, (Continued)

8. Analysis was performed for vehicles travelling to the following landfills for Scenarios A + B:
- Toland Road Landfill (Table 2)
 - Simi Landfill* (Table 3)
 - Chiquita Landfill* (Table 4)
 - Sunshine Landfill* (Table 5)

4.0 Calculations

1. Table 1 lists summertime and wintertime EMFACTF running I/M exhaust emission factors at 75°F and 50°F, respectively. Table also shows the emission factors corrected for temperature (75°F) and averaged and corrected to 60°F. These average emission factors were used in Tables 2 through 5 to calculate emissions.
2. Tables 2 through 5 show the results of emission rate calculation described above.

Table 1
EMFAC7F EMISSION FACTORS
YEAR: 2020-SUMMERTIME & WINTERTIME AT 55 MPH

Pollutant Name	SUMMERTIME RUNNING IM EXHAUST EMISSION FACTORS AT 75 DEG F				WINTERTIME RUNNING IM EXHAUST EMISSION FACTORS AT 50 DEG F				AVERAGE EMISSION FACTOR, CORRECTED TO 60 DEG				
	LIGHT DUTY AUTOS	LIGHT DUTY TRUCKS	HEAVY DUTY TRUCKS	HEAVY DUTY TRUCKS	LIGHT DUTY AUTOS	Corrected to 75 deg.	LIGHT DUTY TRUCKS	Corrected to 75 deg.	HEAVY DUTY TRUCKS	Corrected to 75 deg.	LIGHT DUTY AUTOS	LIGHT DUTY TRUCKS	HEAVY DUTY TRUCKS
NOx	Catalytic 0.26	Catalytic 0.50	DIESEL 13.31	DIESEL 13.31	Catalytic 0.32	0.34	Catalytic 0.61	0.64	DIESEL 13.31	13.96	Catalytic 0.29	Catalytic 0.55	DIESEL 13.25
PM10	0.03	0.04	1.37	1.37	0.03	0.03	0.04	0.04	1.37	1.44	0.03	0.04	1.36
PM10(Tire wear)(1)	0.01	0.01	0.97	0.97	0.01	0.01	0.01	0.01	0.97	1.02	0.01	0.01	0.97
CO	0.20	0.20	0.66	0.66	0.20	0.20	0.20	0.20	0.66	0.66	0.20	0.20	0.64
SOx(2)	1.24	1.72	6.53	6.53	1.23	1.29	1.71	1.79	6.53	6.85	1.23	1.71	6.50
	0.05	0.05	0.28	0.28	0.05	0.05	0.05	0.05	0.28	0.29	0.05	0.05	0.28

NOTES:

- (1) Tire wear emission factors are assumed to be uncorrected by temperature.
- (2) Emission factors for SOx are not included in EMFAC7F. EMFAC emission factors for South Coast Air Quality Management District for the year 2009 were used. Emission factors for Light Duty Autos and Trucks were assumed to be 100% unleaded fueled (catalytic) and the emission factor for Heavy Duty Trucks is assumed coincide with ARB's heavy/heavy-duty vehicles, assumed to be 100% diesel fueled. (See attachment A)

BY: SW Date: 7/28/05 CHKD BY: RB Date: 8/25/95

Sheet 6 of 9 Project No. 95-105

TABLE 2
OFF-SITE EMISSIONS CALCULATIONS FOR ALTERNATIVES ANALYSIS (PROPOSED EXPANSION)
TO TOLAND LANDFILL

VEHICLE TYPE	EMFAC VEHICLE DUTY CLASSIFICATION	TOTAL ROUND TRIP DISTANCE, VRT (MILES/DAY)	EMFAC EMISSION FACTORS, EF, AT 60 DEG F AND 50 MPH (GRAMS/MILE)						EMISSION RATES, EM (POUNDS PER DAY)					
			NOx	FOG	PM10	SOx	CO	NOx	FOG	PM10	SOx	CO		
SCENARIO A: TRANSFER AND PACKER TRUCKS														
Light Duty Truck	LDT	250	0.55	0.04	0.21	0.05	1.71	0.31	0.02	0.12	0.03	0.94		
Packer Trucks	HDT	2,844	13.25	1.36	1.61	0.28	6.50	83.03	8.55	10.07	1.75	40.73		
Transfer Truck	HDT	3,081	13.25	1.36	1.61	0.28	6.50	89.95	9.26	10.91	1.89	44.13		
Water Truck	HDT	N/A	13.25	1.36	1.61	0.28	6.50	N/A	N/A	N/A	N/A	N/A		
TOTAL EMISSIONS								173.28	17.83	21.09	3.67	85.80		
SCENARIO B: PACKER TRUCKS ONLY														
Light Duty Truck	LDT	5,115	0.55	0.04	0.21	0.05	1.71	6.24	0.45	2.37	0.56	19.24		
Packer Trucks	HDT	11,726	13.25	1.36	1.61	0.28	6.50	342.32	35.24	41.52	7.20	167.95		
Water Truck	HDT	N/A	0.00	0.00	0.00	0.00	0.00	N/A	N/A	N/A	N/A	N/A		
TOTAL EMISSIONS								348.56	35.68	43.88	7.76	187.19		

LDA= Light Duty Auto
LDT= Light Duty Truck
-HDT=Heavy Duty Truck

TABLE 3
OFF-SITE EMISSIONS CALCULATIONS FOR ALTERNATIVES ANALYSIS (PROPOSED EXPANSION)
TO SIMI LANDFILL

VEHICLE TYPE	EMFAC VEHICLE DUTY CLASSIFICATION	TOTAL ROUND TRIP DISTANCE, VRT (MILES/DAY)	EMFAC EMISSION FACTORS, EF, AT 60 DEG F AND 50 MPH (GRAMS/MILE)						EMISSION RATES, EM (POUNDS PER DAY)							
			NOx	PM10	SOx	CO	FOG	NOx	PM10	SOx	CO	FOG	NOx	PM10	SOx	CO
SCENARIO A: TRANSFER AND PACKER TRUCKS																
Light Duty Truck	LDT	968	0.55	0.04	0.21	0.05	1.71	0.08	0.45	0.11	1.18	0.08	0.45	0.11	3.64	
Packer Trucks	HDT	2,844	13.25	1.36	1.61	0.28	6.50	8.55	10.07	1.75	83.03	8.55	10.07	1.75	40.73	
Transfer Truck	HDT	3,081	13.25	1.36	1.61	0.28	6.50	9.26	10.91	1.89	89.95	9.26	10.91	1.89	44.13	
Water Truck	HDT	N/A	13.25	1.36	1.61	0.28	6.50	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
TOTAL EMISSIONS									174.15	17.89	21.43	3.74	88.50			
SCENARIO B: PACKER TRUCKS ONLY																
Light Duty Truck	LDT	5,918	0.55	0.04	0.21	0.05	1.71	0.52	2.74	0.65	7.22	0.52	2.74	0.65	22.26	
Packer Trucks	HDT	12,185	13.25	1.36	1.61	0.28	6.50	36.61	43.14	7.48	355.72	36.61	43.14	7.48	174.52	
Water Truck	HDT	N/A	13.25	1.36	1.61	0.28	6.50	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
TOTAL EMISSIONS									362.94	37.13	45.88	8.13	196.78			

LDA= Light Duty Auto
LDT= Light Duty Truck
HDT=Heavy Duty Truck

BY: SW Date: 7/28/95

CHKD BY: RB Date: 8/25/95

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TABLE 4
OFF-SITE EMISSIONS CALCULATIONS FOR ALTERNATIVES ANALYSIS (PROPOSED EXPANSION)
TO CHIQUITA LANDFILL

VEHICLE TYPE	EMFAC VEHICLE DUTY CLASSIFICATION	TOTAL ROUND TRIP DISTANCE, VRT (MILES/DAY)	EMFAC EMISSION FACTORS, EF, AT 60 DEG F AND 50 MPH (GRAMS/MILE)						EMISSION RATES, EM (POUNDS PER DAY)												
			NOx	FOG	PM10	SOx	CO	NOx	FOG	PM10	SOx	CO									
SCENARIO A: TRANSFER AND PACKER TRUCKS																					
Light Duty Truck	LDT	1,085	0.55	0.04	0.21	0.05	1.71	1.32	0.10	0.50	0.12	4.08									
Packer Trucks	HDT	5,292	13.25	1.36	1.61	0.28	6.50	154.49	15.90	18.74	3.25	75.80									
Transfer Truck	HDT	5,733	13.25	1.36	1.61	0.28	6.50	167.37	17.23	20.30	3.52	82.11									
Water Truck	HDT	N/A	13.25	1.36	1.61	0.28	6.50	N/A	N/A	N/A	N/A	N/A									
TOTAL EMISSIONS													323.18	33.22	39.54	6.89	161.99				
SCENARIO B: PACKER TRUCKS ONLY																					
Light Duty Truck	LDT	10,212	0.55	0.04	0.21	0.05	1.71	12.46	0.90	4.72	1.12	38.41									
Packer Trucks	HDT	22,215	13.25	1.36	1.61	0.28	6.50	648.53	66.75	78.65	13.64	318.18									
Water Truck	HDT	N/A	13.25	1.36	1.61	0.28	6.50	N/A	N/A	N/A	N/A	N/A									
TOTAL EMISSIONS													661.00	67.65	83.38	14.76	356.59				

LDA= Light Duty Auto
LDT= Light Duty Truck
-HDT=Heavy Duty Truck

TABLE 5
OFF-SITE EMISSIONS CALCULATIONS FOR ALTERNATIVE ANALYSIS (PROPOSED EXPANSION)
TO SUNSHINE LANDFILL

VEHICLE TYPE	EMFAC VEHICLE DUTY CLASSIFICATION	TOTAL ROUND TRIP DISTANCE, VRT (MILES/DAY)	EMFAC EMISSION FACTORS, EF, AT 60 DEG F AND 50 MPH (GRAMS/MILE)						EMISSION RATES, EM (POUNDS PER DAY)								
			NOx	FG	PM10	SOx	CO	NOx	FG	PM10	SOx	CO					
SCENARIO A: TRANSFER AND PACKER TRUCKS																	
Light Duty Truck	LDT	1,715	0.55	0.04	0.21	0.05	1.71	2.09	0.15	0.79	0.19	6.45					
Packer Trucks	HDT	6,804	13.25	1.36	1.61	0.28	6.50	198.63	20.45	24.09	4.18	97.45					
Transfer Truck	HDT	7,371	13.25	1.36	1.61	0.28	6.50	215.19	22.15	26.10	4.53	105.57					
Water Truck	HDT	N/A	13.25	1.36	1.61	0.28	6.50	N/A	N/A	N/A	N/A	N/A					
TOTAL EMISSIONS													415.91	42.74	50.98	8.89	209.47
SCENARIO B: PACKER TRUCKS ONLY																	
Light Duty Truck	LDT	13,488	0.55	0.04	0.21	0.05	1.71	16.46	1.18	6.24	1.48	50.73					
Packer Trucks	HDT	28,767	13.25	1.36	1.61	0.28	6.50	839.81	86.44	101.85	17.67	412.02					
Water Truck	HDT	N/A	13.25	1.36	1.61	0.28	6.50	N/A	N/A	N/A	N/A	N/A					
TOTAL EMISSIONS													856.27	87.63	108.09	19.15	462.75

LDA= Light Duty Auto
LDT= Light Duty Truck
HDT= Heavy Duty Truck

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/28/95 Subject OFF-Site Emissions Sheet No. A1 of 8
Chkd. By RB Date 8/25/95 Calc. Attachment A Proj. No. 95-105

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9
10 Attachment A

11
12 CEQA Air Quality Handbook
13 Excerpts, South Coast
14 Air Quality Management
15 District
16

17 - Table A9-5; Estimating Emissions
18 from On-Road Vehicle Travel
19 (Pounds per Day)
20

21 - Table A9-5-L: EMFAC Emission
22 Factors for SCAQMD, Oxides
23 of Sulfur and Lead, Year 2009.
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CEQA

air quality handbook



Prepared by:

South
Coast
Air
Quality
Management
District

April, 1993

Sheet A3 of 8

**INFORMATION
FOR
VEHICULAR EMISSIONS
IMPACT ON BACKGROUND LEVELS**

**A9-11
B.2.1.3-12**

**TABLE A9 - 5
ESTIMATING EMISSIONS FROM ON-ROAD VEHICLE TRAVEL
(Pounds Per Day)******

(The highest of the Daily VMT, ADT, NOV and Speed Values have to be selected between Weekdays and Weekends. Emission Factors have to be selected from Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for Passenger Vehicles and from A9 - 5 - K - 1 through A9 - 5 - K - 10 for Trucks Depending Upon which County the Project is Located in, and Year (Build-out or Construction))

$$E^* = [(D \times F \times Y \times G) \times (H, \text{ or } I)] / \{454\} \quad \text{for SOx \& Pb; \underline{AND},}$$

$$E^{**} = \{[(D \times F \times Y \times G) \times (N)] + [(D \times F \times Y \times G) \times (O)]\} / \{454\}$$

for PM10; and, for CO and NOx see next page.

Where,

- D** = The project size in square feet, number of units, number of flights, etc.
- F** = The highest of the weekday and weekend trips (Use two-way or round trips to estimate daily emissions) rate in same unit as the value for "D".
(Use Institute of Transportation Engineers (ITE) manual (latest edition), or traffic impact analysis (TIA) data, or defaults in Table A9 - 5 - A - 1, or defaults in Table A9 - 5 - A - 2.)
- Y** = For daily impacts use 1.0. Otherwise, use number of work-days (65 to 91) in a quarter.
- G** = The highest trip-length of the weekday or weekend in miles.
(Use ITE Manual (latest edition), TIA data or defaults in Table A9 - 5 - D and Table A9 - 5 - E.)

Do not subtract 3.59 miles from estimated trip-length when calculating CO or NOx emissions from running exhaust emissions.

- E*** = Emissions of SOx and Pb (lead) in pounds per day from on-road vehicle travel
- H******* = SOx: Adjusted using "Burden" output to obtain vehicle miles traveled based emission factors. There are no evaporative running losses associated with SOx.
(See Table A9 - 5 - L for passenger vehicles and trucks.)
- I******* = Pb (Lead): Adjusted using "Burden" output to obtain vehicle miles traveled based emission factors. There are no evaporative running losses associated with Pb.
(See Tables A9 - 5 - L for passenger vehicles and trucks.)
- E**** = Emissions of PM10 in pounds per day from on-road vehicle travel
- N******* = PM10: EMFAC7 running exhaust factor. There are no evaporative running losses associated with PM10.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)
- O******* = PM10: EMFAC7 running tire-wear factor. There are no evaporative running losses associated with PM10.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

**** Use *AM Peak Speeds* to select emission factors for CO and NOx; use *Off Peak Speeds* to select emission factors for ROCs; use *PM Peak Speeds* for SOx, PM10 and Pb (Lead).

Table A9 - 5 (Cont.)

(The highest of the Daily VMT, ADT, NOV and Speed Values have to be selected between Weekdays and Weekends. Emission Factors have to be selected from Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for Passenger Vehicles and from A9 - 5 - K - 1 through A9 - 5 - K - 10 for Trucks Depending Upon which County the Project is Located in, and Year (Build-out or Construction))

$$E^{***} = \frac{\{[(D \times F \times Y \times G) \times (J \text{ or } K)] + [(D \times F \times Y \times W) \times (L1, \text{ or } M1)] + [(D \times F \times Y \times Z) \times (L2, \text{ or } M2)]\}}{454}$$

for CO, and NOx;
and, See next page for ROCs.

Where,

- D** = The project size in square feet, number of units, number of flights, etc.
- F** = The highest of the weekday and weekend trips (Use 2 way or round trips to estimate daily emissions) rate in same unit as the value for "D"
(Use ITE manual (latest edition), TLA data or defaults in Table A9 - 5 - A - 1 or Table A9 - 5 - A - 2.)
- Y** = For daily impacts use 1.0. Otherwise, use number of work-days (65 to 91) in a quarter.
- G** = The highest of the weekday or weekend trip-length in miles.
(Use ITE Manual (latest edition), TLA data or defaults in Table A9 - 5 - D and Table A9 - 5 - E.)

Do not subtract 3.59 miles from estimated trip-length when calculating carbon monoxide or oxides of nitrogen emissions from running exhaust emissions. Because cold and hot starts were determined using 3.59 miles traveling distance, in the past, many persons were subtracting 3.59 miles from the estimated trip-length. The District recommends not to do that for running exhaust emissions using emission factors included in this handbook.

- E***** = Emissions of carbon monoxide and oxides of nitrogen in pounds per day from on-road vehicle travel
- J** = Carbon Monoxide or CO: EMFAC7 Running exhaust emission factors. There are no evaporative running losses associated with CO.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)
- K** = Oxides of Nitrogen or NOx: EMFAC7 Running exhaust emission factors. There are no evaporative running losses associated with NOx.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

EMFAC start-ups do not include evaporative running losses. Estimate the cold start emissions only for those daily trips which are associated with start or re-start of the vehicles one or more hours after the engine was previously turned off. Use 0.0, if not applicable.

- W** = Percent cold start trips. (If unknown, use Table A9 - 5 - M to determine percent cold start trips.)
 - L1** = Carbon Monoxide: EMFAC7 Cold start emission factors.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)
 - M1** = Oxides of Nitrogen : EMFAC7 Cold start emission factors
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)
- Estimate the hot start emissions only for those daily trips which are associated with re-start of the vehicles within less than one hour. Use 0.0, if not applicable.
- Z** = Percent hot start trips. (Use ITE Manual or TLA. If unknown, use Table A9 - 5 - M to determine percent hot start trips.)
 - L2** = Carbon Monoxide: EMFAC7 Hot start emission factors
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)
 - M2** = Oxides of Nitrogen : EMFAC7 Hot start emission factors
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

TABLE A9 - 5 (Cont. from Previous Page)

(The highest of the Daily VMT, ADT, NOV and Speed Values have to be selected between Weekdays and Weekends. Emission Factors have to be selected from Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for Passenger Vehicles and from A9 - 5 - K - 1 through A9 - 5 - K - 10 for Trucks Depending Upon which County the Project is Located in, and Year (Build-out or Construction))

$$E^{****} = \frac{\{[D \times F \times Y \times G \times R] + [D \times F \times Y \times W \times S1] + [D \times F \times Y \times Z \times S2] + [D \times F \times Y \times T]\}}{+ \{[(D \times F \times Y)/(U)] \times V\}} / \{454\} \quad \text{for ROC.}$$

Where,

- D** = The project size in square feet, number of units, number of flights, etc.
F = The highest of the weekday or weekend trip (Use 2 way or round trips to estimate daily emissions) rate in same unit as the value for "D".
(Use ITE manual (latest edition), TLA data or defaults in Table A9 - 5 - A - 1 or Table A9 - 5 - A - 2.)
Y = For daily impacts use 1.0. Otherwise, use number of work-days (65 to 91) in a quarter.
G = The highest of the weekday or weekend trip-length in miles.
(Use ITE Manual (latest edition), TLA data or defaults in Table A9 - 5 - D and Table A9 - 5 - E.)

Do not subtract 3.59 miles from estimated trip-length when calculating carbon monoxide or oxides of nitrogen emissions from running exhaust and evaporative (R) emissions. Cold and hot starts are determined using 3.59 miles traveling distance. Therefore, in the past, 3.59 miles were removed from the estimated trip-length. The District recommends not to do such subtraction for running exhaust emissions using emission factors included in this handbook.

- E****** = Emissions of reactive organic compounds in pounds per day from on-road vehicle travel
R = Reactive organic gases or ROCs: EMFAC7 Running exhaust emission factors. There are evaporative running losses associated with ROCs.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

Estimate cold start emissions only for those daily trips which are associated with start or re-start of the vehicles one or more hours after the engine was previously turned off. EMFAC starts do not include evaporative losses.

- W** = Percent cold start trips. *(If unknown, use Table A9 - 5 - M to determine percent cold start trips.)*
S1 = Reactive organic gases: EMFAC7 Cold start emission factors.
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

Estimate hot start emissions only for those daily trips which are associated with re-start of the vehicles within less than one hour. Use 0.0, if not applicable.

- Z** = Percent hot start trips. *(Use ITE Manual or TLA. If unknown, use Table A9 - 5 - M to determine percent hot start trips.)*
S2 = Reactive organic gases: EMFAC7 Hot start emission factors
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

Estimate hot soak emissions for all daily trips including all cold and hot start trips. Hot soak emissions do not include any exhaust emissions. Hot soak emissions are evaporative emissions after turning off the vehicle.

- T** = Reactive Organic Compounds: EMFAC7 Hot-Soak evaporative emission factors
 Estimate diurnal emissions for total number of vehicles addressed in this analysis including those vehicles with cold and hot start trips. Diurnal emissions are evaporative emissions caused by vehicle being parked in the areas where there is a potential for an increase in the ambient temperature. Temperature changes could result from parking the car in direct sunlight, or in shaded areas.
U = Number of trips that will occur per car per day or per car per quarter (65 to 91 days). If unknown, use 2.0 for two one-way trip, and use 1.0 for one one-way trip.
V = Reactive Organic Compounds: EMFAC7 Diurnal evaporative emission factor
(See Tables A9 - 5 - J - 1 through A9 - 5 - J - 10 for passenger vehicles, from A9 - 5 - K - 1 through A9 - 5 - K - 10 for trucks, from A11 - 5 - H - 1 through A11 - 5 - H - 10 for buses, and Table A9 - 5 - N for motorcycles.)

The default tables are included on the following pages. The default tables provide information for 1987 and 2010. A straight line interpolation should be used to determine appropriate default between these two years. Each table provides a number of options based on the information known about the project. These tables are meant to provide guidance. Project proponent or local governments may have project specific information that could be used instead. For truck related default values please use EPA Report for the Contract Number A2-155-32 on Assessment of Heavy-Duty Gasoline and Diesel Vehicles in California: Population and Use Patterns, Prepared in July 1985 by Yuji Horie, Richard Rapoport of Pacific Environmental Services, Inc. Available at SCAQMD Library.

TABLE A9 - 5 - L
EMFAC EMISSION FACTORS FOR SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Oxides of Sulfur and Lead Emissions

Year	Vehicles with Gross Vehicle Weight up to 6,000 Pounds*** (grams per mile)						Vehicles with Gross Vehicle Weight 6,000 Pounds and Greater*** (grams per mile)					
	OXIDES of SULFUR			LEAD			OXIDES of SULFUR			LEAD		
	AREA1	AREA2	AREA3	AREA1	AREA2	AREA3	AREA1	AREA2	AREA3	AREA1	AREA2	AREA3
1991	0.07	0.07	0.07	0.00016	0.00016	0.00017	0.44	0.44	0.44	0.0017	0.0017	0.0017
1993	0.06	0.06	0.06	0.00011	0.00012	0.00012	0.33	0.33	0.33	0.0011	0.0011	0.0011
1995	0.06	0.06	0.06	N/A	N/A	N/A	0.32	0.32	0.32	0.0010	0.0010	0.0010
1997	0.06	0.06	0.06	N/A	N/A	N/A	0.31	0.31	0.31	0.0007	0.0007	0.0007
1999	0.05	0.05	0.05	N/A	N/A	N/A	0.30	0.30	0.30	0.0007	0.0007	0.0007
2001	0.05	0.05	0.05	N/A	N/A	N/A	0.30	0.30	0.30	0.0007	0.0007	0.0007
2003	0.05	0.05	0.05	N/A	N/A	N/A	0.30	0.30	0.30	0.0004	0.0004	0.0004
2005	0.05	0.05	0.05	N/A	N/A	N/A	0.29	0.29	0.29	0.0004	0.0004	0.0004
2007	0.05	0.05	0.05	N/A	N/A	N/A	0.28	0.28	0.28	0.0004	0.0004	0.0004
2009	0.05	0.05	0.05	N/A	N/A	N/A	0.28	0.28	0.28	0.0004	0.0004	0.0004

Emissions (pounds per day) = (*VMT x EMISSION FACTOR)/454

*VMT = Vehicle Miles Traveled per Day

- Vehicle Miles Traveled (VMT) or Average Daily Trips (ADT)-weighted emission factors:
Includes VMT or ADT from diesel-fueled vehicles (33.33%), gasoline-fueled vehicles equipped with catalyst (46.02%), and gasoline-fueled vehicles not equipped with catalyst (20.65%).
- Number of Vehicles (NOV)-weighted emission factors:
Includes NOV from diesel-fueled vehicles (33.33%), gasoline-fueled vehicles equipped with catalyst (37.74%), and gasoline-fueled vehicles not equipped with catalyst (28.93%).
- Vehicles with gross vehicle weight 6,001 pounds and up:
Includes ARB's medium-duty and light/heavy-duty, medium/heavy-duty and heavy/heavy-duty vehicles, e.g.: construction and demolition materials hauling trucks. (SG10HD29.WK1)

Attachment A
 Sheet A8 of 8
 Source:
CEQA AIR
QUALITY HANDBOOK
 South Coast
 Air Quality
 Management
 District,
 April 1993.

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/28/95 Subject Off-Site Emissions Sheet No. B1 of 5
Chkd. By _____ Date _____ Calc. Attachment B Proj. No. 25-105

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Attachment B

- EMFACTF Emission Factors at 75°F
- (1) Year 2020 - Summer time
 - (2) Year 2020 - Wintertime

Run dates 7/20/95

EMFAC7F EMISSION FACTORS
YEAR: 2020-SUMMERTIME

RUN DATES: REPORT 07/20/95

TABLE 1: SUMMERTIME RUNNING I/M EXHAUST EMISSION FACTORS AT 75 DEG F

POLLUTANT NAME: TOTAL ORGANIC GASES SPEED MPH	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY		
	DIESEL		DIESEL		DIESEL		DIESEL		ALL		
	NCAT	CAT	NCAT	CAT	NCAT	CAT	NCAT	DIESEL	NCAT	ALL	
5	0.00	0.17	0.00	0.27	0.00	0.96	5.29	2.17	5.73	10.98	9.47
10	0.00	0.08	0.00	0.13	0.00	0.48	3.47	1.42	4.50	8.62	4.99
15	0.00	0.06	0.00	0.09	0.00	0.33	2.37	0.97	3.61	6.92	3.52
20	0.00	0.05	0.00	0.08	0.00	0.28	1.69	0.69	2.48	4.76	2.85
25	0.00	0.05	0.00	0.07	0.00	0.25	1.25	0.51	2.48	4.76	2.44
30	0.00	0.04	0.00	0.07	0.00	0.24	0.97	0.40	2.13	4.08	2.13
35	0.00	0.04	0.00	0.06	0.00	0.22	0.78	0.32	1.86	3.58	1.88
40	0.00	0.04	0.00	0.05	0.00	0.19	0.66	0.27	1.67	3.20	1.70
45	0.00	0.03	0.00	0.05	0.00	0.17	0.57	0.24	1.53	2.93	1.60
50	0.00	0.03	0.00	0.04	0.00	0.15	0.52	0.22	1.44	2.75	1.56
55	0.00	0.03	0.00	0.04	0.00	0.16	0.50	0.21	1.37	2.63	1.50
60	0.00	0.04	0.00	0.06	0.00	0.21	0.50	0.20	1.34	2.57	1.32
65	0.00	0.07	0.00	0.12	0.00	0.42	0.51	0.21	1.34	2.57	0.90

POLLUTANT NAME: CARBON MONOXIDE SPEED MPH	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY		
	DIESEL		DIESEL		DIESEL		DIESEL		ALL		
	NCAT	CAT	NCAT	CAT	NCAT	CAT	NCAT	DIESEL	NCAT	ALL	
5	0.00	5.48	0.00	7.60	0.00	9.89	44.74	25.68	34.70	68.05	52.42
10	0.00	3.31	0.00	4.40	0.00	5.73	29.77	17.75	23.93	46.92	25.20
15	0.00	2.27	0.00	3.05	0.00	3.97	20.92	12.48	17.27	33.86	16.55
20	0.00	1.72	0.00	2.37	0.00	3.08	15.54	9.27	13.04	25.57	12.69
25	0.00	1.39	0.00	1.97	0.00	2.57	12.19	7.27	10.31	20.21	10.39
30	0.00	1.07	0.00	1.71	0.00	2.23	10.11	6.03	8.53	16.72	8.72
35	0.00	1.00	0.00	1.53	0.00	1.99	8.85	5.28	7.38	14.47	7.47
40	0.00	0.99	0.00	1.40	0.00	1.83	8.19	4.89	6.69	13.11	6.59
45	0.00	1.05	0.00	1.35	0.00	1.76	8.01	4.78	6.34	12.43	6.08
50	0.00	1.24	0.00	1.42	0.00	1.85	8.28	4.94	6.29	12.34	5.84
55	0.00	1.66	0.00	1.72	0.00	2.24	9.03	5.39	6.53	12.81	5.65
60	0.00	1.66	0.00	2.55	0.00	3.31	10.42	6.21	7.10	13.92	5.07
65	0.00	2.68	0.00	5.04	0.00	6.56	12.69	7.57	8.07	15.83	3.65

POLLUTANT NAME: OXIDES OF NITROGEN SPEED MPH	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY		
	DIESEL		DIESEL		DIESEL		DIESEL		ALL		
	NCAT	CAT	NCAT	CAT	NCAT	CAT	NCAT	DIESEL	NCAT	ALL	
5	0.00	0.34	0.00	0.63	0.00	2.16	4.24	2.22	17.43	31.14	0.71
10	0.00	0.25	0.00	0.47	0.00	1.61	4.45	2.34	14.46	25.83	0.64
15	0.00	0.20	0.00	0.38	0.00	1.28	4.66	2.45	12.43	22.21	0.66
20	0.00	0.17	0.00	0.31	0.00	1.07	4.88	2.56	11.07	19.78	0.71
25	0.00	0.15	0.00	0.27	0.00	0.93	5.09	2.67	10.22	18.26	0.79
30	0.00	0.14	0.00	0.26	0.00	0.88	5.31	2.79	9.77	17.46	0.87
35	0.00	0.14	0.00	0.26	0.00	0.90	5.52	2.90	9.68	17.30	0.94
40	0.00	0.15	0.00	0.29	0.00	0.99	5.74	3.01	9.94	17.76	0.99
45	0.00	0.18	0.00	0.34	0.00	1.15	5.95	3.13	10.57	18.89	1.02
50	0.00	0.21	0.00	0.41	0.00	1.39	6.17	3.24	11.55	20.82	1.08
55	0.00	0.26	0.00	0.50	0.00	1.70	6.38	3.35	13.31	23.77	1.20
60	0.00	0.32	0.00	0.61	0.00	2.08	6.60	3.46	15.75	28.13	1.48
65	0.00	0.39	0.00	0.74	0.00	2.53	6.81	3.58	19.31	34.48	2.17

TABLE 1 (CONTINUED): SUMMERTIME RUNNING I/M EXHAUST EMISSION FACTORS AT 75 DEG F

POLLUTANT NAME: EXHAUST PARTICULATES	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		MD. DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY ALL
	NCAT	DIESEL	NCAT	DIESEL	NCAT	DIESEL	NCAT	DIESEL	DIESEL	DIESEL	
SPEED MPH											
5	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01
10	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01
15	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01
20	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01
25	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01
30	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01
35	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01
40	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01
45	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01
50	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01
55	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01
60	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01
65	0.00	0.01	0.00	0.01	0.00	0.01	0.08	0.08	0.08	2.00	0.01

POLLUTANT NAME: TIRE WEAR	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		MD. DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY ALL
	NCAT	DIESEL	NCAT	DIESEL	NCAT	DIESEL	NCAT	DIESEL	DIESEL	DIESEL	
SPEED MPH											
5	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10
10	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10
15	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10
20	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10
25	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10
30	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10
35	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10
40	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10
45	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10
50	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10
55	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10
60	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10
65	0.00	0.20	0.00	0.20	0.00	0.20	0.33	0.33	0.33	0.66	0.10

EMFAC7F EMISSION FACTORS
 YEAR: 2020-WINTER
 RUN DATES: REPORT 07/20/95

TABLE 1: WINTERTIME RUNNING I/M EXHAUST EMISSION FACTORS AT 50 DEG F

POLLUTANT NAME: TOTAL ORGANIC GASES SPEED MPH	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY		
	DIESEL		DIESEL		CAT		DIESEL		ALL		
	NCAT	CAT	NCAT	CAT	NCAT	CAT	NCAT	DIESEL	NCAT	ALL	
5	0.00	0.16	0.00	0.26	0.00	0.91	6.37	2.62	5.73	10.98	9.56
10	0.00	0.08	0.00	0.13	0.00	0.45	4.17	1.71	4.50	8.62	5.04
15	0.00	0.06	0.00	0.09	0.00	0.31	2.85	1.17	3.61	6.92	3.55
20	0.00	0.05	0.00	0.07	0.00	0.26	2.03	0.83	2.96	5.68	2.88
25	0.00	0.04	0.00	0.07	0.00	0.24	1.51	0.62	2.48	4.76	2.47
30	0.00	0.04	0.00	0.06	0.00	0.22	1.16	0.48	2.13	4.08	2.15
35	0.00	0.04	0.00	0.06	0.00	0.20	0.94	0.39	1.86	3.58	1.90
40	0.00	0.03	0.00	0.05	0.00	0.18	0.79	0.32	1.67	3.20	1.72
45	0.00	0.03	0.00	0.04	0.00	0.16	0.69	0.28	1.53	2.93	1.57
50	0.00	0.03	0.00	0.04	0.00	0.14	0.63	0.26	1.43	2.75	1.57
55	0.00	0.03	0.00	0.04	0.00	0.15	0.60	0.25	1.37	2.63	1.51
60	0.00	0.04	0.00	0.06	0.00	0.20	0.60	0.25	1.34	2.57	1.33
65	0.00	0.06	0.00	0.11	0.00	0.40	0.62	0.25	1.34	2.57	0.91
POLLUTANT NAME: CARBON MONOXIDE											
SPEED MPH	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY		
	DIESEL		DIESEL		CAT		DIESEL		ALL		
	NCAT	CAT	NCAT	CAT	NCAT	CAT	NCAT	DIESEL	NCAT	ALL	
5	0.00	5.47	0.00	7.58	0.00	9.87	54.25	32.36	34.70	68.05	52.97
10	0.00	3.30	0.00	4.15	0.00	5.72	36.09	21.53	23.93	46.92	25.47
15	0.00	2.27	0.00	3.04	0.00	3.96	25.37	15.13	17.27	33.86	16.72
20	0.00	1.72	0.00	2.36	0.00	3.08	18.84	11.24	13.04	25.57	12.83
25	0.00	1.39	0.00	1.79	0.00	2.56	14.79	8.82	10.31	20.21	10.50
30	0.00	1.19	0.00	1.71	0.00	2.22	12.26	7.31	8.53	16.72	8.82
35	0.00	1.07	0.00	1.52	0.00	1.98	10.74	6.40	7.38	14.47	7.55
40	0.00	1.00	0.00	1.40	0.00	1.82	9.94	5.93	6.69	13.11	6.66
45	0.00	0.99	0.00	1.35	0.00	1.76	9.71	5.79	6.34	12.43	6.14
50	0.00	1.05	0.00	1.42	0.00	1.85	10.04	5.99	6.29	12.34	5.90
55	0.00	1.23	0.00	1.71	0.00	2.23	10.95	6.53	6.53	12.81	5.71
60	0.00	1.66	0.00	2.54	0.00	3.31	12.63	7.53	7.10	13.92	5.13
65	0.00	2.67	0.00	5.03	0.00	6.54	15.39	9.18	8.07	15.83	3.68
POLLUTANT NAME: OXIDES OF NITROGEN											
SPEED MPH	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY		
	DIESEL		DIESEL		CAT		DIESEL		ALL		
	NCAT	CAT	NCAT	CAT	NCAT	CAT	NCAT	DIESEL	NCAT	ALL	
5	0.00	0.42	0.00	0.77	0.00	2.63	4.89	2.57	17.43	31.14	0.82
10	0.00	0.31	0.00	0.57	0.00	1.96	5.14	2.70	14.46	25.83	0.74
15	0.00	0.25	0.00	0.46	0.00	1.57	5.39	2.83	12.43	22.21	0.76
20	0.00	0.21	0.00	0.38	0.00	1.30	5.63	2.96	11.07	19.78	0.83
25	0.00	0.18	0.00	0.33	0.00	1.14	5.88	3.09	10.22	18.26	0.92
30	0.00	0.17	0.00	0.31	0.00	1.07	6.13	3.22	9.77	17.46	1.01
35	0.00	0.17	0.00	0.32	0.00	1.09	6.38	3.35	9.68	17.30	1.09
40	0.00	0.19	0.00	0.35	0.00	1.21	6.67	3.48	9.94	17.76	1.14
45	0.00	0.22	0.00	0.41	0.00	1.41	6.83	3.61	10.57	18.89	1.19
50	0.00	0.26	0.00	0.50	0.00	1.70	7.12	3.74	11.65	20.82	1.25
55	0.00	0.32	0.00	0.61	0.00	2.07	7.37	3.87	13.31	23.77	1.39
60	0.00	0.39	0.00	0.74	0.00	2.53	7.62	4.00	15.75	28.13	1.72
65	0.00	0.47	0.00	0.90	0.00	3.08	7.87	4.13	19.31	34.48	2.52

TABLE 1 (CONTINUED): WINTERTIME RUNNING I/M EXHAUST EMISSION FACTORS AT 50 DEG F

POLLUTANT NAME: EXHAUST PARTICULATES SPEED MPH	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		MD. DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY ALL
	NCAT	CAT	DIESEL	DIESEL	NCAT	CAT	NCAT	CAT	DIESEL	DIESEL	
5	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
10	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
15	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
20	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
25	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
30	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
35	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
40	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
45	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
50	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
55	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
60	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01
65	0.00	0.01	0.42	0.01	0.00	0.01	0.08	0.08	0.97	2.00	0.01

POLLUTANT NAME: TIRE WEAR SPEED MPH	LIGHT DUTY AUTOS		LIGHT DUTY TRUCKS		MD. DUTY TRUCKS		HEAVY DUTY TRUCKS		URBAN BUS		MCY ALL
	NCAT	CAT	DIESEL	DIESEL	NCAT	CAT	NCAT	CAT	DIESEL	DIESEL	
5	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
10	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
15	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
20	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
25	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
30	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
35	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
40	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
45	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
50	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
55	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
60	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10
65	0.00	0.20	0.20	0.20	0.00	0.20	0.33	0.33	0.66	0.66	0.10

ENVIRONMENTAL SOLUTIONS, INC.

By SW Date 7/28/95 Subject Off-site Emissions Sheet No. 01 of 2
Chkd. By _____ Date _____ Calcs. - Mileage Info for Proj. No. 95-105
Alternatives

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Attachment C
Mileage Information for
Alternatives



MILEAGE INFORMATION FOR ALTERNATIVES

FROM:	TO:	TOLAND	SIMI	CHIQUITA	SUNSHINE
OXNARD		23.7	23.7	44.1	56.7
FILLMORE		6.3	15.0	17.4	30.0
SANTA PAULA		4.3	23.7	26.0	38.6

Scenario A: **PROPOSED PROJECT SCENARIO (TRANSFER AND PACKER TRUCKS)**
Vehicles Miles Per Day

VEHICLE TYPE	LANDFILL			
	TOLAND	SIMI	CHIQUITA	SUNSHINE
Auto/self haul*	2,480	968	1,085	1,715
Packer trucks	2,844	2,844	5,292	6,804
Transfer trucks	3,081	3,081	5,733	7,371
Water trucks	126	n/a	n/a	n/a

Auto Light Duty Truck: 1994 486

Scenario B: **WORSE CASE SCENARIO (PACKER TRUCKS)**
Vehicles Miles Per Day

VEHICLE TYPE	LANDFILL			
	TOLAND	SIMI	CHIQUITA	SUNSHINE
Auto/self haul*	7,346	5,918	10,212	13,488
Packer trucks	11,726	12,185	22,215	28,767
Transfer trucks	0	0	0	0
Water trucks	126	n/a	n/a	n/a

Auto Light Duty Truck: 1994 5352

* Only includes waste haul for Simi, Chiquita and Sunshine (i.e., does not include employees, VRSD staff or visitors. For comparison, Toland self haul only: Proposed Project= 250 mi, Worse Case=5,115 mi.

** Simi, Chiquita, Sunshine
"Auto/self haul" as shown is 100% light duty trucks.

75- Packer & Transfer trucks
are both heavy duty
(you were right)

B.2.1.4 - Train Emissions Analysis

**TABLE B.2.1.4
TRAIN EMISSIONS FROM HAULING 1,500 TONS PER DAY
SOLID WASTE FROM VENTURA COUNTY**

LANDFILL	ROUND TRIP DISTANCE(1) (miles)	FUEL(2) PER ROUND TRIP (gallons)	NO _x		ROG		PM ₁₀		SO _x		CO	
			Emission Factor(3) (lbs/gal)	Emission (lbs/day)	Emission Factor(3) (lbs/gal)	Emission (lbs/day)	Emission Factor(3) (lbs/gal)	Emission (lbs/day)	Emission Factor(3) (lbs/gal)	Emission (lbs/day)	Emission Factor(3) (lbs/gal)	Emission (lbs/day)
Carbon Canyon	2,300	8,288	0.512	4,243	0.022	182	0.011	92	0.037	307	0.068	567
Bolo Station	460	1,658	0.512	849	0.022	36	0.011	18	0.037	61	0.068	113
Mesquite Regional	590	2,126	0.512	1,089	0.022	47	0.011	24	0.037	79	0.068	145
Eagle Mountain	490	1,766	0.512	904	0.022	39	0.011	20	0.037	66	0.068	121

95-105 Final EIR (1/4/96/mm)

- (1) Distances are based from Oxnard transfer station (Sturgis Road/Rice Avenue).
- (2) The following assumptions and factors were used to calculate gallons of diesel fuel:
 - Weight of train required to haul 1,500 tons = 1,131 tons.
 - Total weight based on weight of train plus waste (2,631 tons) for one-way trip to landfill, and train weight only (1,131 tons) for one-way trip return to Oxnard transfer station.
 - Fuel consumption rate = 522 ton-miles/gallon (source: Southern Pacific Transportation Company).
- (3) Booz-Allen & Hamilton, 1991, Locomotive Emission Study, Report to California Air Resources Board, Exhibits 4-5 and 4-11, mixed freight data.

B.2.2 ONSITE EMISSIONS

Both ISC2 and CTDMPlus air dispersion models were used in this criteria pollutant impact analysis. The results were compared and the ISC2 modeling produced the more conservative results, therefore, it was used for the analysis.

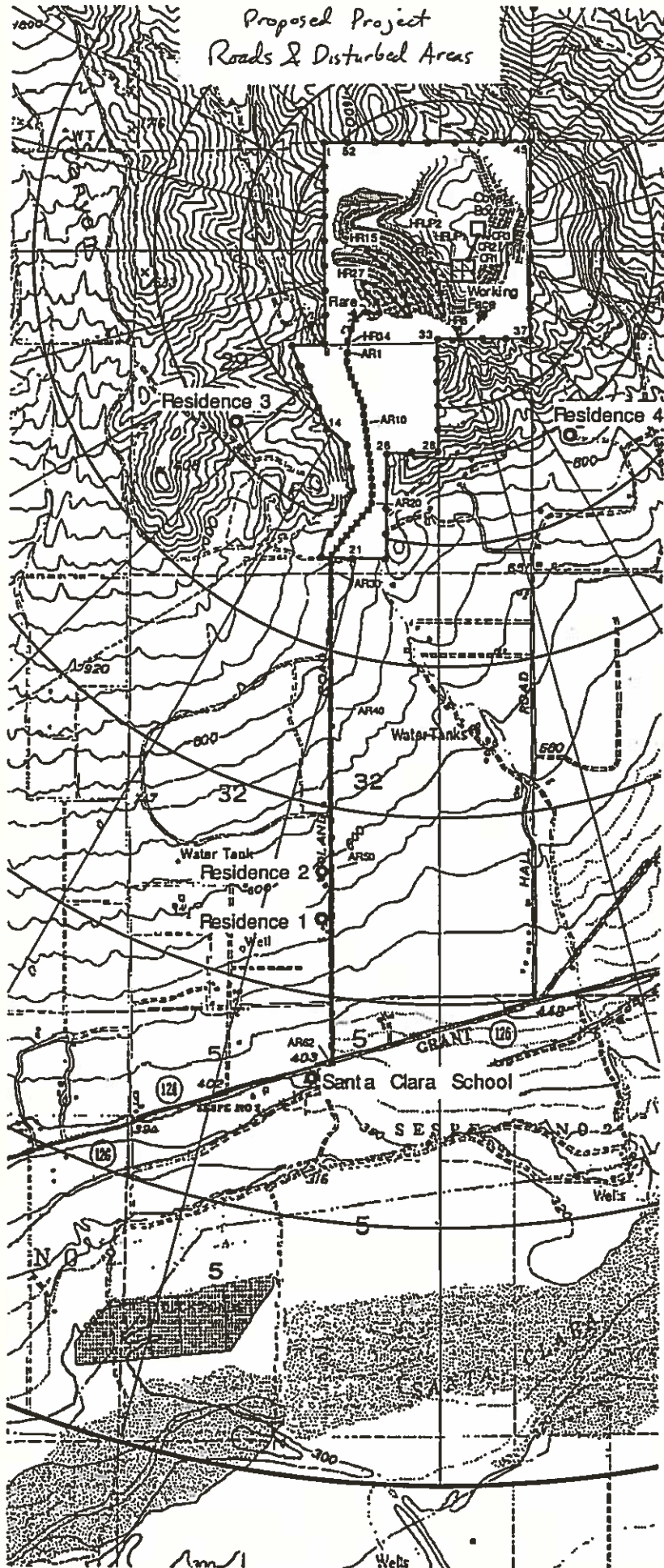
A diskette that contains the meteorological data file (in ASCII format), and the input and output files from the modeling performed in this analysis has been provided to the County APCD. The diskette includes the ISC2 run and CTDMPlus run for the flare in the Proposed Project scenario for comparison. There are also ISC2 input files for the fugitive LFG, vehicle exhaust and fugitive dust emission sources. Since the Closure and Postclosure scenarios have emission sources that are subsets of those in the Proposed Project scenario, these ISC2 runs are sufficient to document the three scenarios.

Also on the diskette provided to the APCD are the output files from the ESI ISC2 Postprocessor. This program merely scales and sums modeled concentrations from ISC2 binary output files allowing flexibility in analyzing various scenarios. The methodology is to model all sources with ISC2 in as modular a manner as possible, using unit emission rates. The resulting binary output files are then combined and scaled as desired for a scenario. The ESI ISC2 Postprocessor output lists the ISC2 output files and emission scaling factors used to produce the published results. These results can be reproduced without the ESI ISC2 Postprocessor by running ISC2 with the actual emission rates.

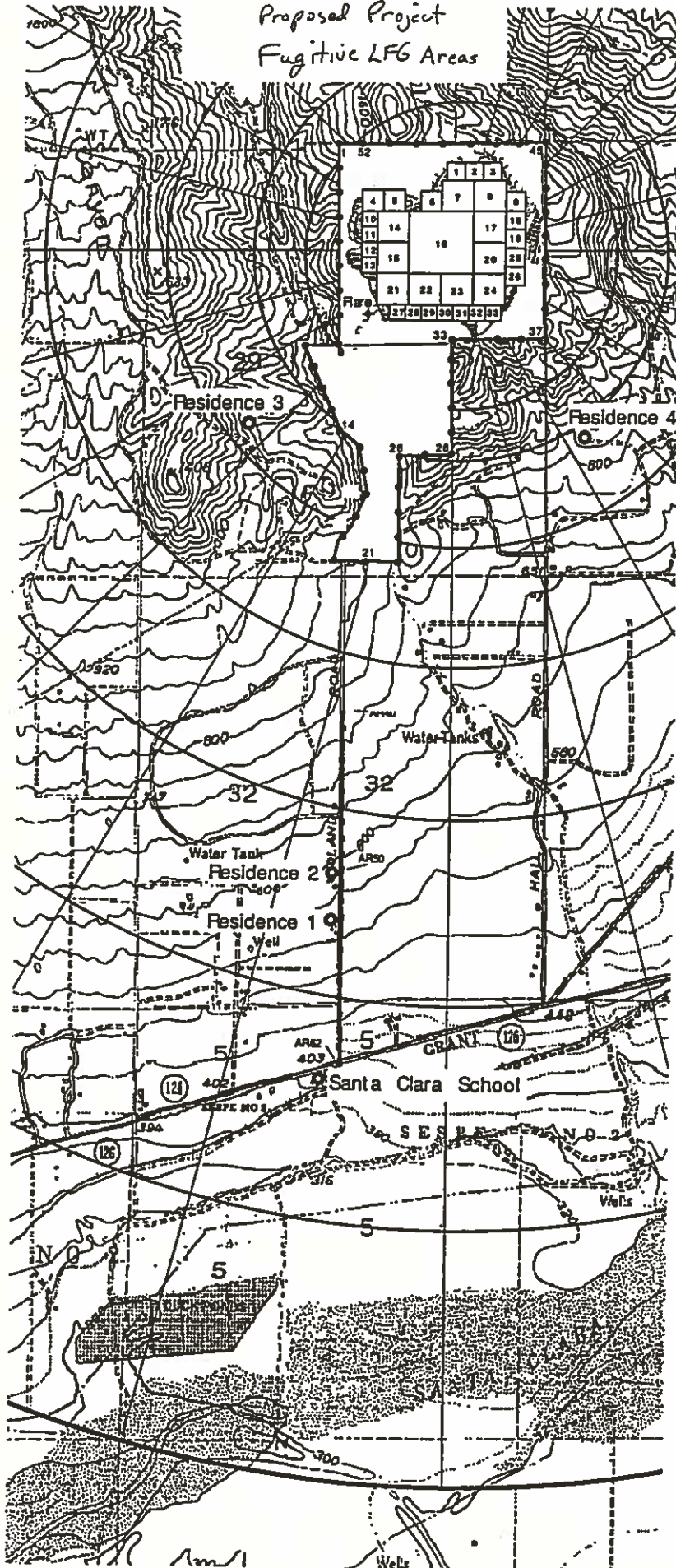
B.2.2.1 Source and Receptor Maps

The following maps show the placement of the sources and receptors used for the air dispersion modeling. The first shows the road sources, disturbed areas, property line receptors, sensitive receptors and a portion of the gridded receptors. The second shows the fugitive LFG sources. The third shows the entire gridded receptor set.

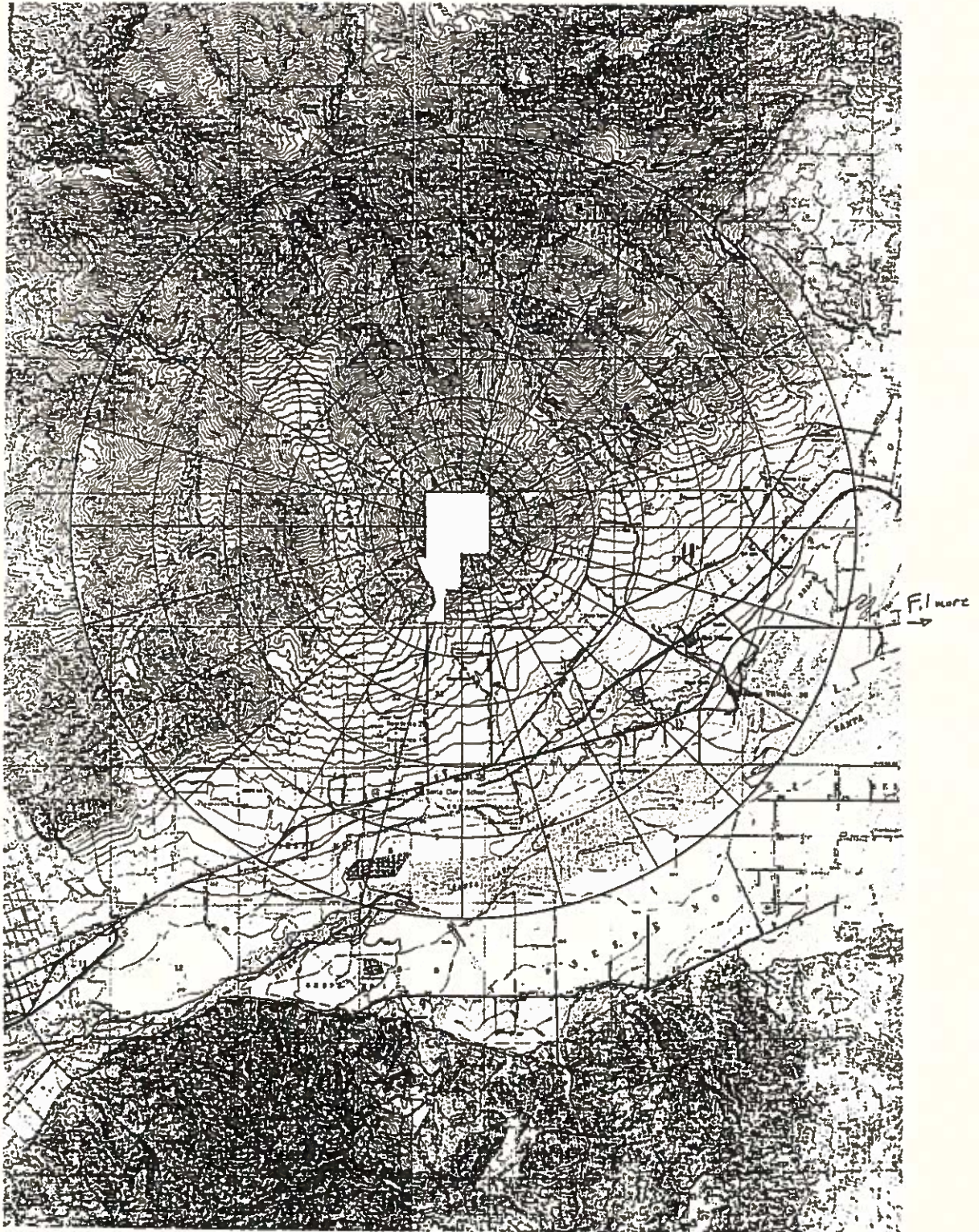
Proposed Project
Roads & Disturbed Areas



Proposed Project
Fugitive LFG Areas



5 Km Receptor Grid
(spaced every 15 degrees w/ 8 circles)
for 192 total receptors



B.3 HEALTH RISK ASSESSMENT

Both ISC2 and Complex I air dispersion models were used in this health risk assessment (HRA). The results were compared and they both produced the same MEI risk probability and location.

A diskette that contains the ISC2 run for the flare in the Proposed Project scenario, and the ISC2 run for the fugitive LFG and vehicle exhaust emission sources has been provided to the County APCD. Since the Closure and Postclosure scenarios have emission sources that are subsets of those in the Proposed Project scenario, this one set of runs is sufficient to document the three scenarios. The diskette provided to the APCD contains the corresponding ACE2588 input and output files. There is also a table that was used to combine the flare and other sources outputs when comparing the ISC2 and Complex I modeling results.

The following tables show the constituents included in this HRA, the concentrations calculated based on the emission inventories above and key inputs and outputs of the HRA.

HEALTH RISK ASSESSMENT TABLES

- B.3.1** Estimated PAH Emission Rates for Uncontrolled Diesel Engines
- B.3.2** Estimated Cr(VI), PAH, PM₁₀ and ROG Emissions - Onsite and Offsite Heavy Duty Vehicles - Proposed Expansion
- B.3.3** Toxic Air Contaminant Speciation and Dose-Response Values
- B.3.4** Toxic Air Contaminant Emission Rates - Proposed Project
- B.3.5** Proposed Project - Health Risk Summary
- B.3.6** Exposure Time Conversion Chart

TABLE B.3.1
Estimated PAH Emission Rates
For Uncontrolled Diesel Engines

Compound	Toxicity Group ⁽¹⁾	Carcinogenic Compound ⁽²⁾	Compound Sampled Above Detection Limit ⁽³⁾	AP-42 Emission Factor ⁽⁴⁾ (lb/MMBTU) [fuel input]	OEHHA Potency Equivalency Factor ⁽⁵⁾	Scaled Emission Rate (lb/MMBTU) ⁽⁶⁾ [fuel input]	Scaled Emission Rate (lb/Mgal) ⁽⁶⁾ [fuel input]
Naphthalene	EPA-D	NO	YES	8.48E-05	--	--	--
Acenaphthylene	EPA-D	NO	NO	5.06E-06	--	--	--
Acenaphthene	EPA-D	NO	NO	1.42E-06	--	--	--
Fluorene	EPA-D	NO	YES	2.92E-05	--	--	--
Phenanthrene	EPA-D	NO	YES	2.94E-05	--	--	--
Anthracene	EPA-D	NO	YES	1.87E-06	--	--	--
Fluoranthene	EPA-D	YES ⁽⁷⁾	YES	7.61E-06	0.01	7.61E-08	--
Pyrene	IARC-3	YES ⁽⁷⁾	YES	4.78E-06	0.10	4.78E-07	--
Benzo(a)anthracene	EPA-B2	YES	YES	1.68E-06	0.10	1.68E-07	--
Chrysene	EPA-B2	YES	YES	3.53E-07	0.01	3.53E-09	--
Benzo(b)fluoranthene	EPA-B2	YES	NO	9.91E-08	0.10	4.96E-09	--
Benzo(k)fluoranthene	EPA-B2	YES	NO	1.55E-07	0.10	7.75E-09	--
Benzo(a)pyrene	EPA-B2	YES	NO	1.88E-07	1.00	9.40E-08	--
Indeno(1,2,3-cd)pyrene	EPA-B2	YES	NO	3.75E-07	0.10	1.88E-08	--
Dibenz(a,h)anthracene	EPA-B2	YES	NO	5.83E-07	0.60 ⁽⁶⁾	1.75E-07	--
Benzo(g,h,i)perylene	IARC-3	YES ⁽⁷⁾	NO	4.89E-07	0.01	2.45E-09	--
Totals	--	--	--	1.68E-04	--	1.03E-06 ⁽⁷⁾	1.41E-01 ⁽⁷⁾

(1) Toxicity groupings, carcinogenicity, and potency equivalency factors are based on data published by OEHHA (1994)
(2) Emission factors and detection information were taken from Table 3.3-3 of Supplement F to the U.S. Environmental Protection Agency's AP-42 emission factor compilation (U.S. EPA, 1993)
(3) Scaled emission rate, in pounds per million BTU fuel input (lb/MMBTU), was calculated by: (a) assigning noncarcinogenic compounds a zero emission rate; (b) assigning an emission rate of one half the detection limit to non-detect compounds; and scaling by the OEHHA benzo(a)pyrene potency equivalency factor (see footnote 1).
(4) Scaled emission rate, in pounds per million gallons fuel input (lb/Mgal), was calculated assuming 137,000 BTU per gallon of diesel fuel.
(5) Fluoranthene, pyrene, and benzo(g,h,i)perylene are listed by OEHHA as IARC Group 3 and U.S. EPA Group D compounds having either inadequate evidence of carcinogenicity in animals, or unclassifiable as to carcinogenicity in humans. However, OEHHA lists several studies reporting cancer potency data for these compounds. For the purposes of performing a conservative analysis, it is assumed that these compounds are carcinogenic.
(6) Dibenz(a,h)anthracene potency factor is based on Rugen (1989).
(7) Scaled emission rate represents PAH emissions as benzo(a)pyrene toxic equivalent emission. These emission rates are appropriate as input to modeling for risk assessment. They do not represent mass emission rates of PAH.

Table B.3.2
Estimated Cr(VI), PAH, PM₁₀, And ROG Emissions
Onsite and Offsite Heavy Duty Vehicles
Proposed Expansion

I) Emission Factors and Estimated Emissions:

Parameter	Onsite Working Areas	Onsite Road	Offsite Road	Road Total	Notes
Cr(VI) Emissions:					
Exhaust PM ₁₀ Emissions (lb/day)	3.3	2.4	1.3	3.7	(1), (2)
Exhaust PM ₁₀ Emissions (g/sec)	0.03	0.03	0.01	0.04	
Hours/Day Operation	13	12	12	--	
Pounds Cr/Pound PM ₁₀	0.000009	0.000009	0.000009	--	(3)
Pounds Cr(VI)/Pound Cr	0.05	0.05	0.05	--	(4)
Cr(VI) Emissions (lb/day)	1.49E-06	1.08E-06	5.64E-07	1.64E-06	
Cr(VI) Emissions (g/sec)	1.44E-08	1.14E-08	5.92E-09	1.73E-08	
PAH Emissions:					
Diesel Fuel Usage (Kgal/sec)	5.28E-06	6.22E-06	1.25E-06	7.47E-06	(5)
PAH Emission Rate (lb/Kgal diesel)	1.37E-04	1.37E-04	1.37E-04	--	(6)
PAH Emissions (g/sec)	3.28E-07	3.87E-07	7.77E-08	4.65E-07	
ROG Emissions (lb/day)	5.3	5.8	1.06	6.9	(1)
ROG Emissions (g/sec)	0.05	0.06	0.01	0.07	

II) Source Distribution of Emissions:

Volume Source Name ⁽⁷⁾	Area (m ²)	Emissions			
		Cr(VI) (g/sec)	PAH (g/sec)	PM ₁₀ (g/sec)	ROG (g/sec)
Working Face	4,050	3.60E-09	8.21E-08	0.008	0.013
Cover Stockpile	4,050	3.60E-09	8.21E-08	0.008	0.013
Cover Stockpile - Scraper Only	8,100	7.20E-09	1.64E-07	0.016	0.026
On Road Vehicles	N/A	1.73E-08	4.65E-07	0.038	0.072
Totals	16,200	3.17E-08	7.93E-07	0.070	0.124

Notes:

- (1) Onsite PM₁₀ and ROG emissions calculated in Table B.1.1
- (2) Offsite PM₁₀ emissions based on Table 2 of appendix B.2.1.2, Scenario B, heavy duty trucks only, scaled to include Toland Rd. only.
- (3) Total chromium content of diesel exhaust emissions was estimated using CARB's Particulate Matter Species Profile No. 118 (CARB, 1991)
- (4) Hexavalent chromium content of total chromium in diesel exhaust emissions was estimated based on information published by CARB (1988).
- (5) Diesel fuel consumption rate = 0.167 gal/mi., equivalent to 6 mi/gal.
- (6) PAH emission factor rate was derived using calculations documented in Table B.3.1, and is expressed in terms of benzo(a)pyrene toxicity equivalence.
- (7) Volume source identification corresponds to information presented in Tables B.3.4

**TABLE B.3.3
TOXIC AIR CONTAMINANT SPECIATION &
DOSE-RESPONSE VALUES
TOLAND ROAD LANDFILL**

Contaminant (Synonym)	Molecular Weight	Fugitive Gas		Flare Exhaust		Calculated DRE (%)	Vehicle Exhaust (1) (wt. fraction)	Carcinogenic URF (µg/m³)⁴	Acute AEL (µg/m³)	Chronic AEL (µg/m³)
		(ppbv)	(ppbw)	(ppbv)	(ppbw)					
- Volatile Organic Compounds -										
ACETALDEHYDE	44.06	570 (2)	870.21	20 (2)	29.06	96.7	0.0297	2.70E-06 (2)		9 (2)
ACROLEIN	56.07	2.5 (2)	4.86	20 (2)	36.98	--	--		2.5 (2)	0.02 (2)
AMMONIA	17.04	--	--	--	--	--	0.003296		2100 (2)	100 (2)
BENZENE	78.12	1250 (2)	3383.58	45 (2)	115.91	96.6	0.0173	2.90E-05 (2)		71 (2)
1,3-BUTADIENE	54.09	--	--	--	--	--	--	1.70E-04 (11)		
CARBON DISULPHIDE	76.13	2.63	6.94	0.1 (2)	0.25	96.4	--		31000 (12)	31000 (12)
CARBON TETRACHLORIDE	153.81	56 (2)	298.45	0.05 (2)	0.25	99.9	--	4.20E-05 (2)	190 (2)	2.4 (2)
CHLORINE	70.9	--	--	--	--	--	0.000273		23 (2)	7.1 (2)
CHLOROBENZENE	112.56	76 (2)	296.42	0.6 (2)	2.23	99.2	0.0007			70 (2)
CHLOROPORM	119.37	72 (2)	297.90	0.05 (2)	0.20	99.9	--	5.30E-06 (2)		35 (2)
1,2-DIBROMOETHANE (1,2-ETHYLENE DIBROMIDE)	187.88	44 (2)	286.44	0.1 (2)	0.62	99.8	--	7.10E-05 (2)		4.6 (2)
1,2-DICHLOROBENZENE (DICHLOROBENZENE-P)	147	2.63	13.40	0.1 (2)	0.48	96.4	--	1.10E-05 (2)		700 (2)
1,4-DICHLOROBENZENE	147	56 (2)	285.34	--	--	--	--	1.10E-05 (11)		700 (2)
DICHLORODIFLUOROMETHANE	120.91	15450 (2)	64728.33	587	2340.22	96.4	--		4950000 (12)	4950000 (12)
cis-1,2-DICHLOROETHYLENE	96.94	80300 (2)	269725.64	3051	9752.17	96.4	--	1.50E-06 (11)	793000 (12)	793000 (12)
trans-1,2-DICHLOROETHYLENE	96.94	3890 (2)	13066.41	148	473.07	96.4	--	2.00E-05 (11)	793000 (12)	793000 (12)
DICHLOROMETHANE (METHYLENE CHLORIDE)	84.93	12000 (2)	35313.93	39.6 (2)	110.90	99.7	--	1.00E-06 (2)	3500 (2)	3000 (2)
1,4-DIOXANE	88.11	9.8 (2)	29.92	0.17 (2)	0.49	98.3	--	7.70E-06 (2)	20 (2)	4 (2)
ETHYLENE DICHLORIDE (1,2-DICHLOROETHANE)	98.96	84 (2)	288.05	0.05 (2)	0.16	99.9	--	2.00E-05 (2)		95 (2)
ETHYLENE CHLORIDE (1,1-DICHLOROETHANE)	98.96	1.32	4.53	0.05 (2)	0.16	96.4	--	2.00E-06 (11)	810000 (12)	810000 (12)
FORMALDEHYDE	30.03	650 (2)	676.35	840 (2)	831.75	--	0.0679	6.00E-06 (2)	370 (2)	3.6 (2)
HYDROCHLORIC ACID	36.46	--	--	2595 (2)	3119.23	--	--	--	3000 (2)	7 (2)
HYDROGEN FLUORIDE	20.01	--	--	1369 (2)	903.13	--	--	--	580 (2)	5.9 (2)
HYDROGEN SULFIDE	34.08	6000 (2)	7085.24	228	256.21	96.4	--	--	42 (2)	42 (2)
METHYL CHLORIDE (CHLOROMETHANE)	50.49	171	299.16	6.5 (2)	10.82	96.4	--	--	103000 (12)	103000 (12)
METHYL ETHYL KETONE (2-BUTANONE)	72.12	1.32	3.30	0.05 (2)	0.12	96.4	--	--	590000 (12)	590000 (12)
PROPYLENE DICHLORIDE (1,2-DICHLOROPROPANE)	112.99	1.32	3.17	0.05 (2)	0.19	96.4	--	--	347000 (12)	347000 (12)
STYRENE	104.14	128 (2)	461.88	0.1 (2)	0.34	99.9	--	5.70E-07 (11)		700
TETRA CHLOROETHENE (PCB)	165.82	1025 (2)	5889.31	5 (2)	27.34	99.5	--	5.90E-06 (2)	6800 (2)	35 (2)
TOLUENE	92.15	20500 (2)	65456.51	30 (2)	91.15	99.9	0.0175			200 (2)
1,1,1-TRICHLOROETHANE (METHYL CHLOROPORM)	113.4	675 (2)	2652.29	2 (2)	7.48	99.7	--	--	190000 (2)	320 (2)
TRICHLOROETHYLENE	131.38	1350 (2)	6145.63	0.9 (2)	3.90	99.9	--	2.00E-06 (2)		640 (2)
TRICHLOROFLUOROMETHANE	137.36	28.32	125.27	0.87 (2)	3.94	96.9	--	--	5620000 (12)	5.62E+06 (12)
VINYL CHLORIDE	62.5	350 (2)	1191.09	3.7 (2)	7.62	99.4	--	7.80E-05 (2)		26 (2)
VINYLIDENE CHLORIDE (1,1-DICHLOROETHANE)	96.94	88 (2)	295.59	0.05 (2)	0.16	99.9	--	--		32 (2)
XYLENES	106.18	3450 (2)	12693.04	9.5 (2)	33.26	99.7	0.009		4400 (2)	300 (2)
PAHs:										
BENZ(A)ANTHRACENE	228.3	0.079	0.625	0.003 (2)	0.02	96.1	--	1.70E-03 (2)		
BENZ(A)PYRENE	252.32	0.237	2.07	0.009 (2)	0.07	96.5	--	--		
BENZ(B)FLUORANTHENE	252.32	0.105	0.92	0.007 (2)	0.06	93.6	--	--		
BENZ(K)FLUORANTHENE	252.32	0.132	1.15	0.005 (2)	0.04	96.2	--	--		
CHRYSENE	228.3	0.132	1.04	0.006 (2)	0.05	95.4	--	--		
DIBENZ(A,H)ANTHRACENE	278.36	0.263	2.54	0.010 (2)	0.09	96.4	--	--		
INDENO(1,2,3-CD)PYRENE	276.34	0.211	2.02	0.008 (2)	0.07	96.5	--	--		
NAPHTHALENE	128.18	126	562	4.806 (2)	20.31	96.4	--	--		14 (2)
PHENANTHRENE	178.24	1.632	10.1	0.062 (2)	0.36	96.4	--	--		
PYRENE	202.26	0.395	2.77	0.015 (2)	0.10	96.3	--	--		
- Metals -										
ARSENIC	74.92	0.18 (2)	0.48	0.36 (2)	0.89	--	0.000003	3.30E-03 (2)		0.5 (2)
BERYLLIUM	9.012	4.0 (2)	1.2	0.60 (2)	0.18	85.7	--	2.40E-03 (2)		4.80E-03 (2)
CADMIUM	112.4	9.0 (2)	35	1.4 (2)	5.3	84.8	0.000067	4.20E-03 (11)		3.5 (2)
COPPER	63.54	8.5 (2)	19	0.80 (2)	1.7	91.0	0.00003		10 (2)	2.4 (2)
CHROMIUM, HEXAVALENT	52	0.90 (2)	1.6	0.028 (2)	0.028	98.3	--	1.40E-01 (2)		2.00E-03 (2)
LEAD	207.19	0.17 (2)	1.2	0.066 (2)	0.45	63.6	0.00003	8.00E-05 (2)		1.5 (2)
MANGANESE	54.94	2.7 (2)	5.1	0.70 (2)	1.3	75.5	0.000023			0.4 (2)
NICKEL	58.71	0.61 (2)	1.2	0.50 (2)	0.97	--	0.000015	2.60E-04 (2)	1 (2)	0.34 (2)
MERCURY	200.59	0.03 (2)	0.19	0.012 (2)	0.08	58.4	0.000025		30 (2)	0.3 (2)
SELENIUM	78.96	0.03 (2)	0.10	0.20 (2)	0.52	--	0.000004	1.40E-04 (2)	2 (2)	0.5 (2)
ZINC	65.37	22 (2)	49	3.3 (2)	7.1	85.4	0.0004			35 (2)
Carrier Gas Molecular Weight:		28.9 (12)		38.33 (12)						

- (1) Weight fractions from the "Identification of Volatile Organic Compound Species Profiles", CARB, 1991, Table II, VOC species profile #561, and Particulate Matter profile #118.
(2) AB2588 Source Test Report, Bailard Landfill Gas Vent (BTC Environmental, Inc., June, 1991)
(3) AB2588 Source Test Report, Oxnard Landfill Internal Combustion Engine (Petro Chem Environmental Services, Inc., Nov, 1990)
(4) Concentration is one-half of the detection limit.
(5) Weldon Canyon Landfill Environmental Impact Report Technical Appendices, Feb., 1991
(6) PAH emissions rates for vehicles are derived in Table G.3.2
(7) AB2588 Source Test Report, Oxnard Landfill Internal Combustion Engine (Petro Chem Environmental Services, Inc., Oct, 1990)
(8) Stack hexavalent chromium emissions derived in Bailard Health Risk Assessment, Second Edition, (Nov., 1993). Vehicle hexavalent chromium emissions are derived in Table G.3.2.
(9) CAPCOA AB2588, 1993
(10) ACGIH or ASHA TLV
(11) Integrated Risk Information System (IRIS), US EPA
(12) LPG MW assumes 5.5% H₂O, 38% CH₄, 38% CO₂, 13.5% N₂, 4% O₂, and 1% NMHC. Est. MW assumes 12.4% CO₂, 79% N₂, 8.6% O₂.

TABLE B.3.4
TOXIC AIR CONTAMINANT EMISSION RATES
PROPOSED PROJECT

Contaminant (Synonyms)	ACR ID Number	Source Group 1 - J (Fugitive)			Source Group 3 (Flare)			Source Group 3 (Working Pans)			Source Group 3 (Vehicles - Cover Stackpile)			Source Group 3 (Scrapers Only - Cover Stackpile)			Source Group 3 (Vehicles - On Road)		
		Concentration (pphm)	Emission Rate (g/sec)	Concentration (pphm)	Concentration (pphm)	Emission Rate (g/sec)	Concentration (g)	Concentration (g)	Emission Rate (g/sec)	Concentration (g)	Concentration (g)	Emission Rate (g/sec)	Concentration (g)	Concentration (g)	Emission Rate (g/sec)	Concentration (g)	Concentration (g)	Emission Rate (g/sec)	
- Volatile Organic Compounds -																			
ACETALDEHYDE	1	870.21	1.21E-04	2.27E-05	0.0297	3.86E-04	0.0297	0.0297	0.0297	0.0297	0.0297	0.0297	0.0297	0.0297	0.0297	0.0297	0.0297	0.0297	
ACETOLEIN	2	4.26	6.76E-07	2.89E-05	0.003796	0.00E+00	0.003796	0.003796	0.003796	0.003796	0.003796	0.003796	0.003796	0.003796	0.003796	0.003796	0.003796	0.003796	
AMMONIA	3	330.58	4.71E-04	1.15E-01	0.0173	4.28E-05	0.0173	0.0173	0.0173	0.0173	0.0173	0.0173	0.0173	0.0173	0.0173	0.0173	0.0173	0.0173	
BENZENE	11	6.94	9.66E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
CARBON DIOXIDE	148	298.35	4.15E-05	0.25	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
CARBON TETRACHLORIDE	28	298.42	0.00E+00	0.00E+00	0.000273	3.51E-06	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	
CHLORINE	29	298.42	0.00E+00	0.00E+00	0.000273	3.51E-06	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	
CHLOROFORM	28	298.42	0.00E+00	0.00E+00	0.000273	3.51E-06	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	0.000273	
1,1-DICHLOROETHANE (1,2-ETHYLENE DIBROMIDE)	60	297.80	4.15E-05	0.20	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,2-DICHLOROBENZENE (1-CHLOROBENZENE-P)	60	296.41	3.99E-05	0.63	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,4-DICHLOROBENZENE	4	11.40	1.86E-06	0.48	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
DICHLOROMETHANE	107	283.24	3.77E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,1,1-TRICHLOROETHANE	139	647.83	9.01E-03	23.40	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,1,2-DICHLOROETHYLENE	160	287.25	3.25E-02	9.72	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
DICHLOROMETHANE (METHYLENE CHLORIDE)	96	1306.64	1.82E-03	4.73	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,1-DICHLOROETHYLENE	54	353.13	4.92E-03	118.90	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
ETHYLENE CHLORIDE (1,2-DICHLOROETHANE)	81	29.92	4.01E-06	0.16	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
ETHYLENE CHLORIDE (1,1-DICHLOROETHANE)	54	4.31	6.08E-07	0.16	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
FORMALDEHYDE	102	284.05	9.32E-05	0.16	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
HYDROCHLORIC ACID	70	676.53	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
HYDROGEN FLUORIDE	80	706.54	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
HYDROGEN SULFIDE	81	299.16	9.86E-04	2.00E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
METHYL CHLORIDE (CHLOROMETHANE)	163	3.30	4.18E-05	0.12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
METHYL ETHYL KETONE (2-BUTANONE)	164	31.16	7.19E-07	0.19	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
PROPYLENE CHLORIDE (1,2-DICHLOROPROPANE)	165	4.18	6.43E-05	0.34	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
STYRENE	149	589.31	1.43E-07	0.19	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
TETRACHLOROETHYLENE (PCE)	122	654.53	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
TOLUENE	145	265.29	3.13E-04	27.34	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,1,1-TRICHLOROETHANE (METHYL CHLOROFORM)	91	614.63	9.15E-04	91.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
TRICHLOROETHYLENE	144	614.63	9.15E-04	91.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
TRICHLOROFLUOROMETHANE	144	614.63	9.15E-04	91.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
VINYL CHLORIDE	169	1191.09	1.68E-04	7.62	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
VINYLDENE CHLORIDE (1,1-DICHLOROETHENE)	150	293.59	4.17E-05	0.19	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
XYLENES	151	1289.04	1.77E-03	33.26	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
PAHs																			
BENZANTHRACENE	130	0.62	8.70E-08	1.25E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
BENZOPYRENE	100	2.97	2.89E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
BENZOFULVORANTHRENE	100	0.92	1.29E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
BENZOKYFLUORANTHRENE	100	1.15	1.41E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
CHRYSENE	101	1.04	1.45E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
DIBENZ[A,H]ANTHRACENE	102	2.02	2.81E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
INDENO[1,2,3-CD]PYRENE	103	2.02	2.81E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
NAPHTHALENE	104	561.73	7.82E-05	28.31	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
PHENANTHRENE	105	10.08	1.49E-06	0.16	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
PYRENE	106	2.77	3.83E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
- Metals -																			
ARSENIC	10	0.48	6.63E-08	0.89	0.000														

TABLE B.3.5

PROPOSED PROJECT
HEALTH RISK SUMMARY

Toiland Landfill EIR - Proposed Expansion Scenario - All Contaminants * OUTPUT OF AMI/SBCAPCD ACE2588 MODEL VERS. 93288 *
Input File: peACE.DAT Output File: peACE.OUT 12/27/95 14:38:05 Page - 468

*** SUMMARY OF MAXIMUM PREDICTED RISKS ***

CANCER RISK ASSESSMENT

SIGNIFICANT RISK LEVEL = 1.000E-05
IMPACT ZONE RISK LEVEL = 1.000E-07
MAXIMUM PEAK RISK = 6.608E-06
PREDICTED AT RECEPTOR # 198
TOTAL EXCESS BURDEN = 0.000E+00

0 RECEPTORS WITH RISK EXCEEDING SIGNIFICANT RISK LEVEL OF 1.000E-05

ACUTE EXPOSURE TO NON-CANCER POLLUTANTS

SIGNIFICANT HAZARD INDEX = 0.5000
MAXIMUM HAZARD INDEX FOR AN ENDPOINT = 0.0114
PREDICTED AT RECEPTOR # 200

0 RECEPTORS WITH HAZARD INDEX .GE. 0.5000 FOR ONE OR MORE TOXICOLOGICAL ENDPOINTS

CHRONIC EXPOSURE TO NON-CANCER POLLUTANTS

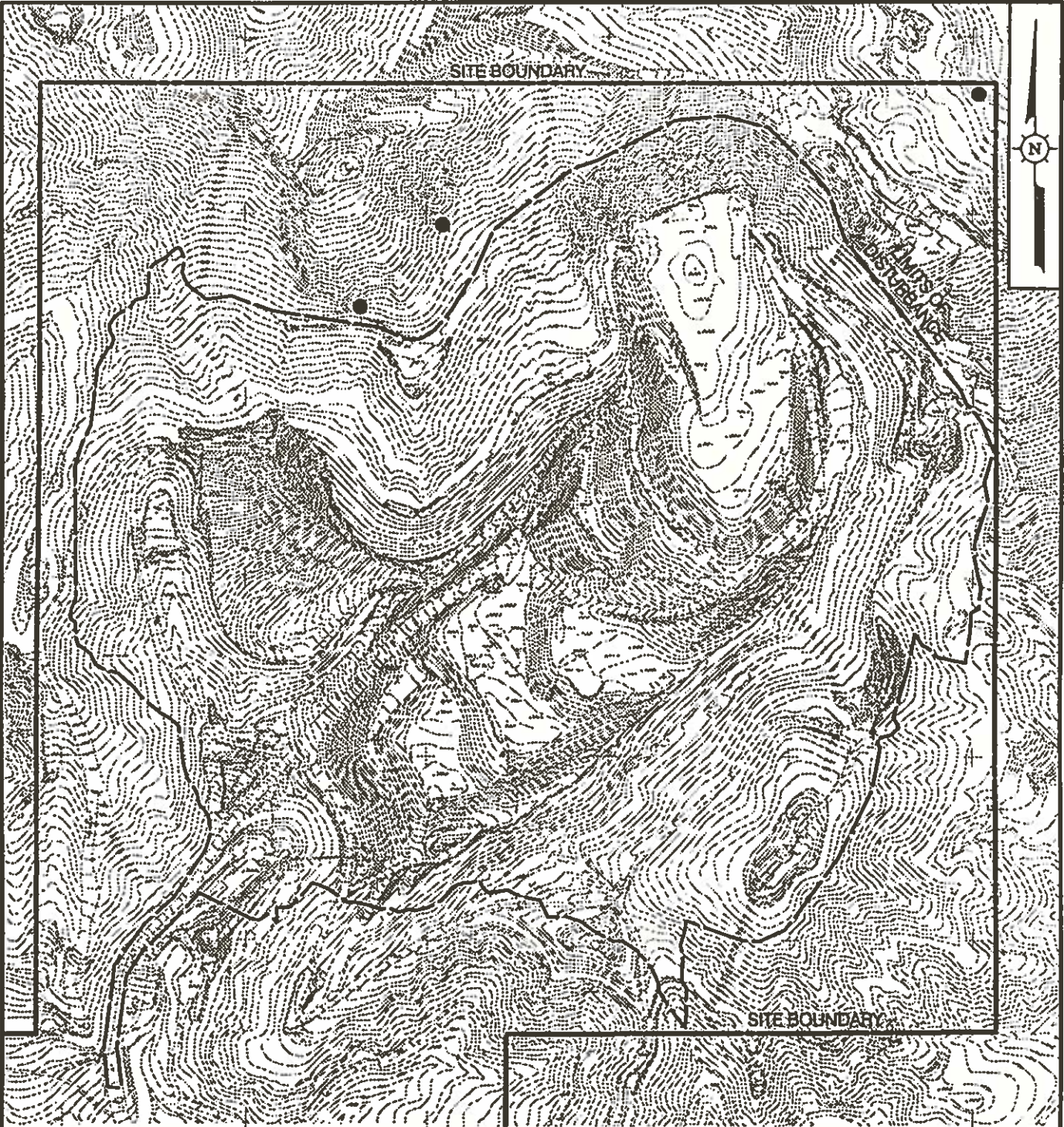
SIGNIFICANT HAZARD INDEX = 0.5000
MAXIMUM HAZARD INDEX FOR AN ENDPOINT = 0.0088
PREDICTED AT RECEPTOR # 198

0 RECEPTORS WITH HAZARD INDEX .GE. 0.5000 FOR ONE OR MORE TOXICOLOGICAL ENDPOINTS

**Table B.3.6
Exposure Time Conversion Chart**

	Proposed Project												
	Offsite Workers			Santa Clara School				Toland Park			Toland Park Host		
	Rec # 249			Rec # 245				Rec # 212			Rec # 212		
	70-yr/24Hr	40-yr/8Hr	70-yr/24Hr	40-yr/8Hr	7-yr/8Hr	70-yr/24Hr	4-dy/24Hr	70-yr/24Hr	4-dy/24Hr	70-yr/24Hr	40-yr/24Hr	70-yr/24Hr	40-yr/24Hr
Inhalation	3.06E-07	0.06	4.64E-08	0.009	0.002	2.30E-07	0.00004	2.30E-07	0.00004	2.30E-07	0.00004	2.30E-07	0.00004
Dermal	1.32E-09	0.0003	2.01E-10	0.00004	0.000007	9.91E-10	0.0000002	9.91E-10	0.0000002	9.91E-10	0.0000002	9.91E-10	0.0000002
Soil	5.64E-09	0.001	8.52E-10	0.0002	0.00003	4.21E-09	0.0000007	4.21E-09	0.0000007	4.21E-09	0.0000007	4.21E-09	0.0000007
Food	1.54E-08	0.003	2.34E-09	0.0004	0.00008	1.15E-08	0.000002	1.15E-08	0.000002	1.15E-08	0.000002	1.15E-08	0.000002
Total		0.06		0.01	0.002		0.00004		0.00004		0.00004		0.00004

APPENDIX C
SURFACE WATER SEEPS



LEGEND

- SURFACE WATER SEEP
(SYMBOL SHOWN IS LARGER THAN
ACTUAL FEATURE TO AID IN VISUALIZATION)

NOTE: ONE ADDITIONAL SEEP IS LOCATED ON VRSD'S 53-ACRE PARCEL (SEE FIGURE 3.4.1 OF THE DRAFT EIR); HOWEVER, IT IS NOT LOCATED IN PROXIMITY TO THE PROPOSED PROJECT SO IT IS NOT SHOWN ON THIS FIGURE.

REFERENCE: BIOLOGICAL RESOURCE EVALUATION TOLAND ROAD LANDFILL, HUNT 1995; GEOLOGIC MAPPING, ENVIRONMENTAL SOLUTIONS, INC., 1995



FIGURE C.1

ONSITE SURFACE WATER SEEPS

TOLAND ROAD LANDFILL
VENTURA REGIONAL SANITATION DISTRICT

ENVIRONMENTAL SOLUTIONS, INC.

APPENDIX D
HYDROLOGY CALCULATIONS

ENVIRONMENTAL SOLUTIONS, INC.

By M.V. Date 6-27-95 Subject TOLAND ROAD LANDFILL Sheet No. 1 of 14
Chkd. By Lmf. Date 6/29/95 HYDROLOGY CALCULATIONS Proj. No. 95-105

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PURPOSE	2
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HYDROLOGY CALCULATIONS	6-7
REFERENCE MATERIALS	8-12
HYDROLOGY MAP (EXISTING CONDITION)	13
HYDROLOGY MAP (PROPOSED CONDITION)	14



ENVIRONMENTAL SOLUTIONS, INC.

By M.V. Date 6-27-95 Subject TOLAND ROAD LANDFILL Sheet No. 2 of 14
Chkd. By lmg Date 6/29/95 HYDROLOGY CALCULATIONS Proj. No. 95-105

PURPOSE

THE PURPOSE OF THESE CALCULATIONS IS TO PERFORM A PRELIMINARY 100-YEAR, 24-HOUR HYDROLOGY ANALYSIS FOR THE EXISTING TOLAND LANDFILL AND SURROUNDING AREA AND THE PROPOSED PROJECT. THE TRIBUTARY AREAS FOR EACH OF THE CONDITIONS IS THE SAME, HOWEVER, SOIL TYPE AND DRAINAGE PATHS ARE VARIED. THE FINAL COVER FOR THE PROPOSED PROJECT WILL CONSIST OF AN IMPERMEABLE CLAY LINER THAT WAS MODELED USING THE COMMERCIAL DESIGNATION IN THE RUNOFF COEFFICIENT CURVE.



ENVIRONMENTAL SOLUTIONS, INC.

By M.V. Date 6-27-95 Subject TOLAND ROAD LANDFILL Sheet No. 3 of 14
Chkd. By limb Date 6/29/95 HYDROLOGY CALCULATIONS Proj. No. 95-105

METHODOLOGY:

THE VENTURA COUNTY MODIFIED RATIONAL METHOD WAS USED. THE MODIFIED RATIONAL METHOD IS BASED ON THE CLASSIC RATIONAL METHOD, WHICH IS A MATHEMATICAL MODEL FOR CALCULATING PEAK RUNOFF FROM A GIVEN RAINFALL.

THE FORMULA IS: $Q = CIA$

WHERE: Q = PEAK RUNOFF RATE, IN CFS.

C = RUNOFF COEFFICIENT

I = AVERAGE RAINFALL INTENSITY CORRESPONDING TO THE TIME OF CONCENTRATION FOR THE DRAINAGE AREA, IN IN/HR.

A = DRAINAGE AREA, IN ACRES.

THE MODIFIED RATIONAL METHOD USES THE CLASSIC RATIONAL METHOD WITH MODIFICATIONS AS FOLLOWS:

- THE RUN OFF COEFFICIENT, C , IS BASED ON THE SOIL BEING SATURATED, AND IS A VARIABLE DEPENDING ON



ENVIRONMENTAL SOLUTIONS, INC.

By M.V. Date 6-27-95 Subject TOLAND ROAD LANDFILL Sheet No. 4 of 14
Chkd. By lmc. Date 6/29/95 HYDROLOGY CALCULATIONS Proj. No. 95-105

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2 IMPERVIOUS, SOIL TYPE, AND RAINFALL INTENSITY.

- 3
- 4 • RAINFALL INTENSITY I, IS A VARIABLE DEPENDING ON
5
6 ELAPSED STORM TIME, TIME OF CONCENTRATION, AND
7
8 RAINFALL FREQUENCY. - 9
 - 10 • TO CALCULATE THE TIME OF CONCENTRATION FOR EXISTING
11
12 CONDITIONS, A NON-SCOURING VELOCITY OF 6.0 FPS WAS
13
14 ASSUMED.
 - 15
 - 16 • TO CALCULATE THE TIME OF CONCENTRATION FOR THE
17
18 PROPOSED PROJECT, A VELOCITY OF 10.0 FPS WAS
19
20 ASSUMED TO ACCOUNT FOR LINED DRAINAGE DITCHES.
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28 REFERENCE:

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30 VENTURA COUNTY HYDROLOGY MANUAL.
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ENVIRONMENTAL SOLUTIONS, INC.

By M.V. Date 6-27-95 Subject TOLAND ROAD LANDFILL Sheet No. 5 of 14
Chkd. By LMG Date 6/29/95 HYDROLOGY CALCULATIONS Proj. No. 95-105

CONCLUSION:

THE 100-YEAR 24-HOUR RUNOFF CALCULATED FOR THE PROPOSED PROJECT, 444 CFS, IS 107 CFS MORE THAN EXISTING CONDITIONS WITH A CALCULATED 100-YEAR 24-HOUR RUNOFF OF 337 CFS. THESE CALCULATIONS SHOW THAT A DETENTION/DESILTING BASIN WILL BE REQUIRED AT THE SOUTH END OF THE PROJECT BOUNDARY. THE CALCULATIONS ARE PRELIMINARY AND SHOULD ONLY BE USED FOR CONCEPTUAL LEVEL ANALYSIS OF THE DRAINAGE IMPACTS. A MORE DETAILED ANALYSIS IS REQUIRED FOR FINAL DESIGN AND SHOULD INCLUDE THE FOLLOWING:

- DETAILED HYDROLOGY STUDY SHOWING DRAINAGE SUBAREAS FOR THE EXISTING AND PROPOSED PROJECT.
- DETENTION/DESILTING BASIN CALCULATIONS INCLUDING:
 - 1) INFLOW/OUTFLOW HYDROGRAPH.
 - 2) SEDIMENT LOADING FROM THE LANDFILL AND
 - 3) BASIN LAYOUT AND DETAILS.

ENVIRONMENTAL SOLUTIONS, INC.

By M.V. Date 6-27-95 Subject TOLAND ROAD LANDFILL Sheet No. 6 of 14
Chkd. By LMG Date 6/29/95 HYDROLOGY CALCULATIONS Proj. No. 95-105

HYDROLOGY CALCULATIONS FOR EXISTING CONDITION

DRAINAGE AREA I

A = 111 ACRES

H.P. = 1530

L.P. = 980

L=HYDRAULIC DISTANCE = 3500 FEET

ASSUME A NON-SCOURING VELOCITY OF 6 FPS

$$T = \frac{L}{60V}$$

$$T = \frac{3500 \text{ FT}}{60 \left(\frac{\text{SEC}}{\text{MIN}} \right) 6 \left(\frac{\text{FT}}{\text{SEC}} \right)} = 9.7 \text{ MIN} \approx 10 \text{ MIN.}$$

I = 3.57 IN/HR (SEE PLATE D-11)

C = 0.851 (SEE PLATE E-2)

$$Q = CIA$$

$$= 0.851 \times 3.57 \times 111 = 337 \text{ CFS}$$

$$Q_{100} = 337 \text{ CFS}$$



ENVIRONMENTAL SOLUTIONS, INC.

By M.V. Date 6-27-95 Subject TOLAND ROAD LANDFILL Sheet No. 7 of 14
Chkd. By Lmg. Date 6/29/95 HYDROLOGY CALCULATIONS Proj. No. 95-105

HYDROLOGY CALCULATIONS FOR PROPOSED CONDITION

DRAINAGE AREA I

A = 111 ACRES

H.P. = 1540

L.P. = 980

L = HYDRAULIC DISTANCE = 4000 FEET

ASSUME A VELOCITY OF 10 FPS BASED ON IMPROVED DITCHES

$$T = \frac{L}{60V}$$

$$T = \frac{4000 \text{ FT}}{60 \left(\frac{\text{SEC}}{\text{MIN}} \right) 10 \left(\frac{\text{FT}}{\text{SEC}} \right)} = 6.7 \text{ MIN.} \approx 7 \text{ MIN.}$$

I = 4.23 IN/HR (SEE PLATE D-11)

C = 0.945 (SEE PLATE E-1) TO COMPENSATE

FOR CLAY LINER OVER THE LANDFILL, USE COMMERCIAL

CURVE:

$$Q = CIA$$

$$= 0.945 \times 4.23 \times 111 = 444 \text{ CFS}$$

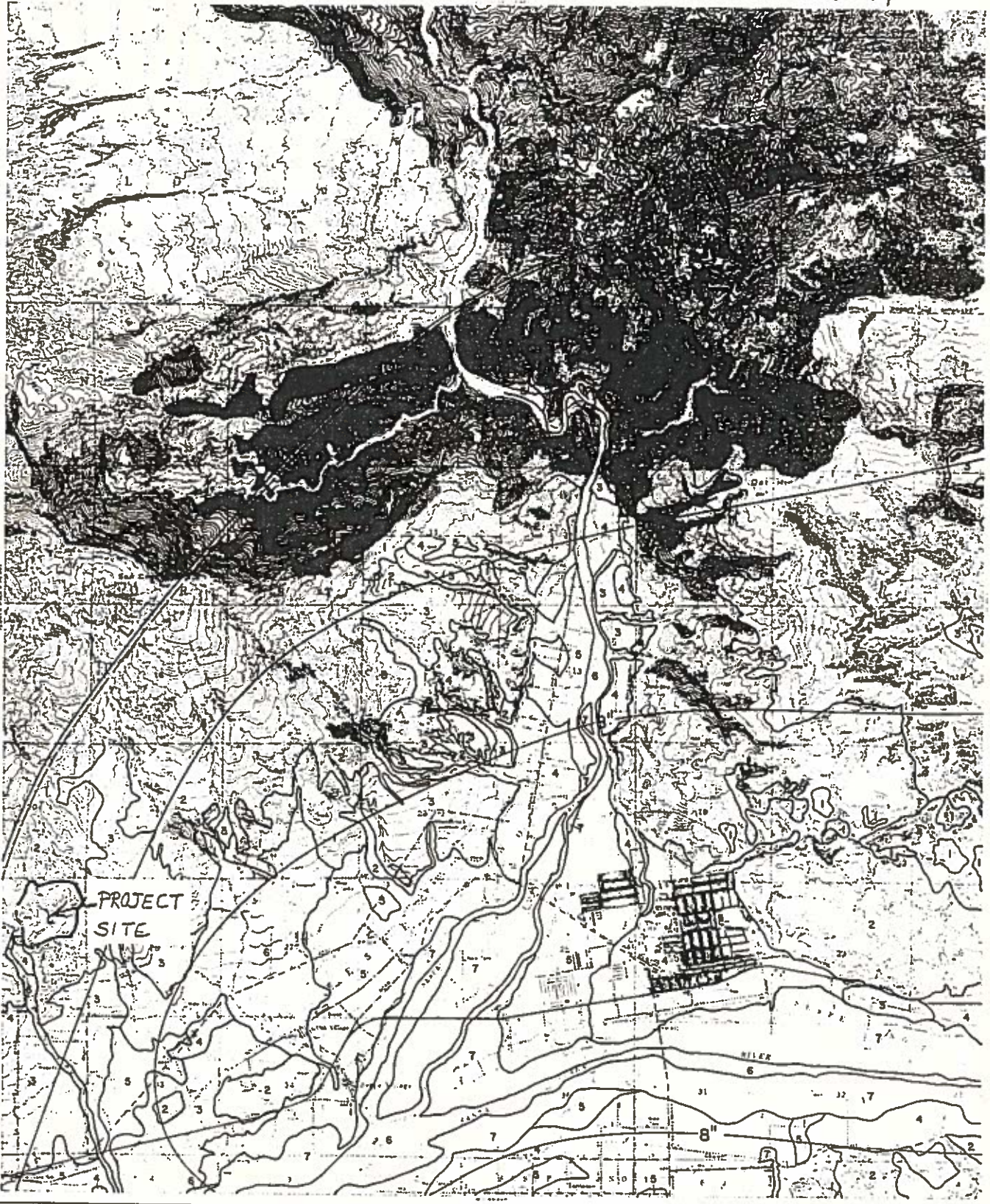
$$Q_{100} = 444 \text{ CFS}$$

ENVIRONMENTAL SOLUTIONS, INC.

By M.V. Date 6-27-95 Subject TOLAND ROAD LANDFILL Sheet No. 8 of 14
Chkd. By Lml Date 6/29/95 HYDROLOGY CALCULATIONS Proj. No. 95-105

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6 REFERENCE MATERIALS
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LEGEND

1000 0 1000 2000
SCALE IN FEET

5 SOIL NUMBER
SOIL TYPE BOUNDARY

RAINFALL ZONE
50-YEAR, 24-HOUR ISOHYET



HYDROLOGIC MAP

FILLMORE

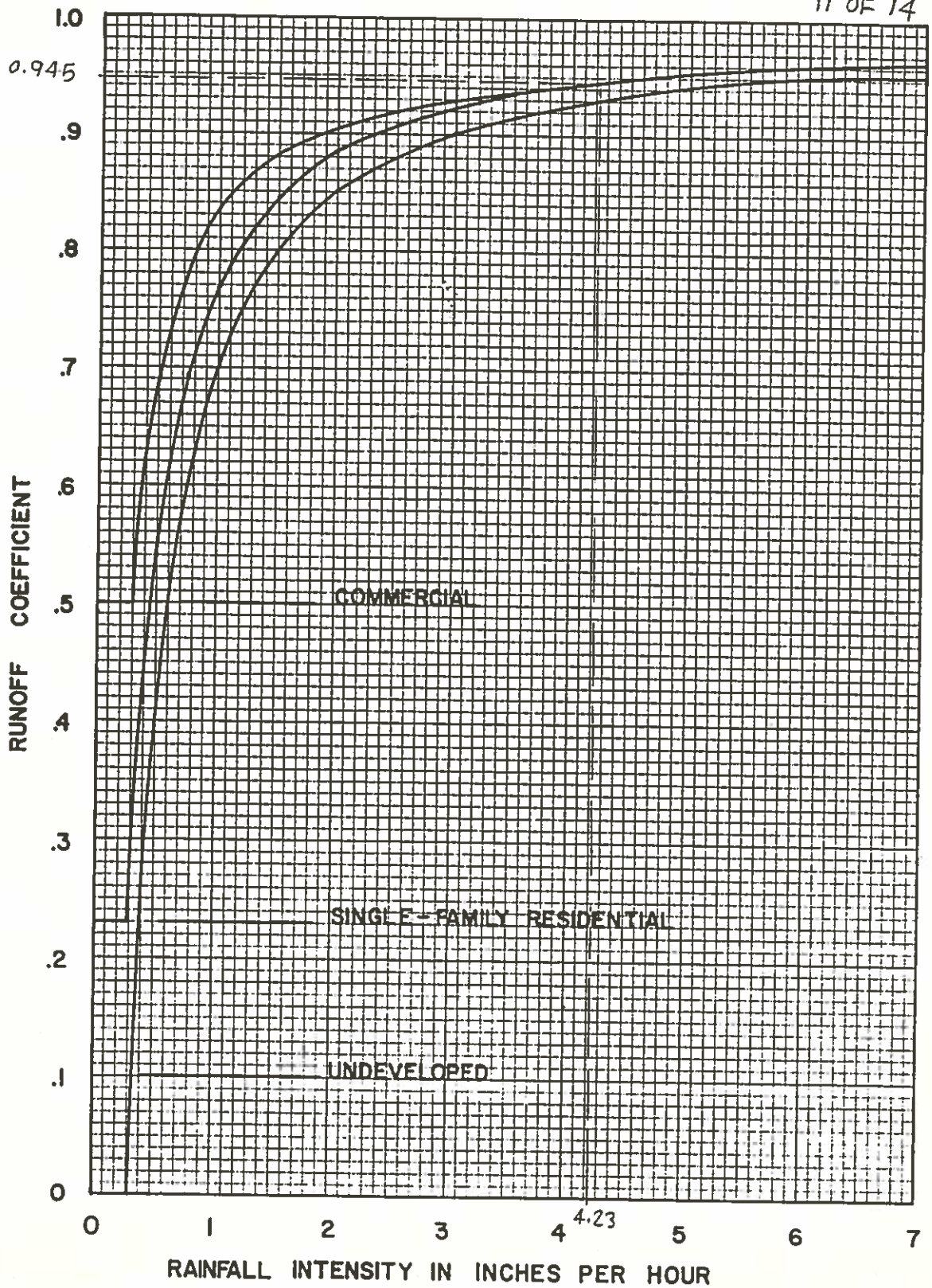
1969

VENTURA COUNTY HYDROLOGY MANUAL

B
Plate B-17

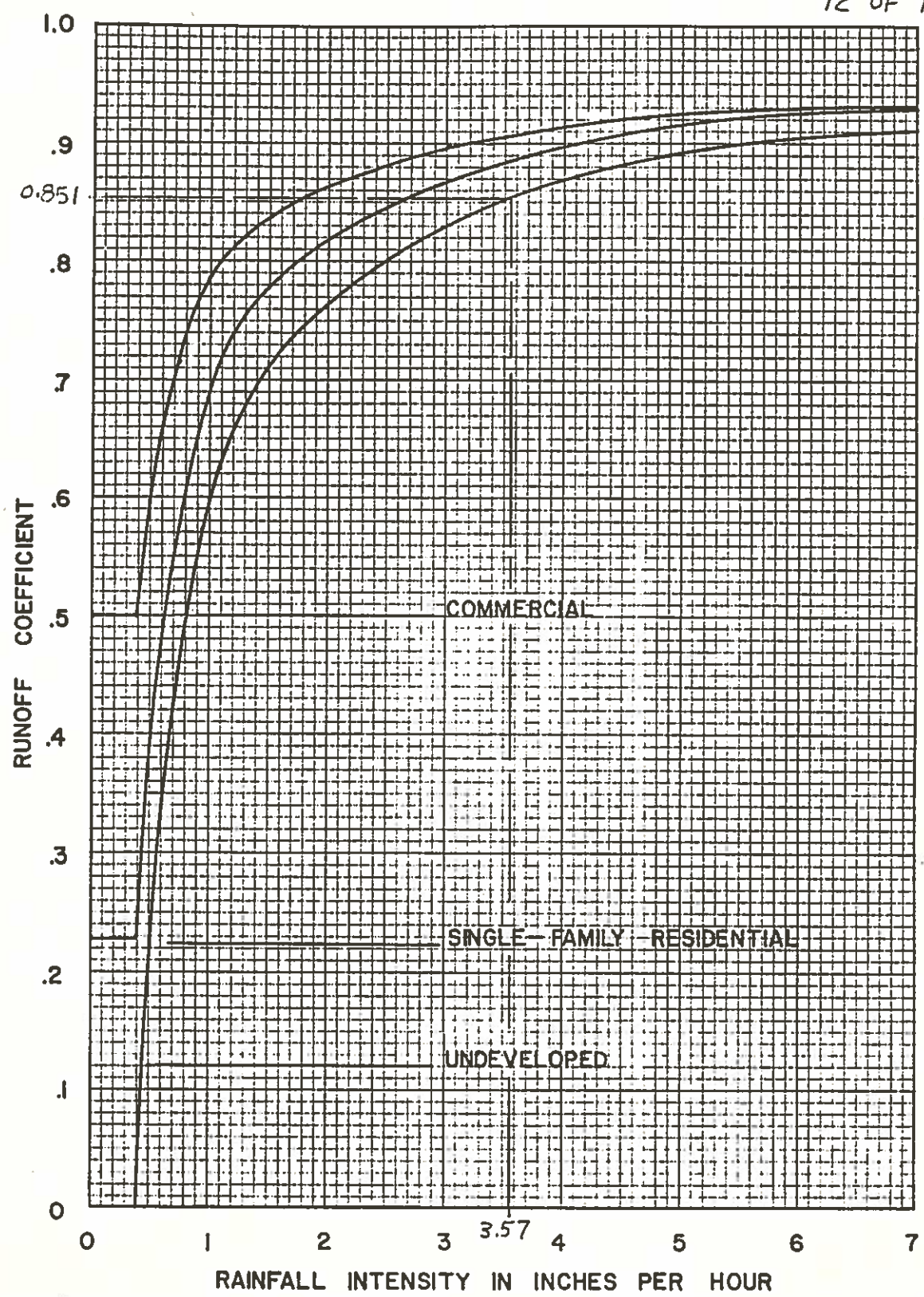
DURATION IN MINUTES

	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
200	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29	.29
400	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34	.34
600	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37	.37
900	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45	.45
1000	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52	.52
1050	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61	.61
1100	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64
1110	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64	.64
1120	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77
1130	1.02	1.02	1.02	1.02	1.02	1.02	1.00	.98	.96	.95	.94	.93	.92	.91	.90	.90	.89	.89	.89	.89	.89	.88	.88	.88	.88	.88
1131	1.02	1.02	1.02	1.02	1.02	1.02	1.02	1.00	.98	.97	.95	.94	.93	.92	.92	.91	.90	.90	.90	.90	.89	.89	.89	.89	.89	.88
1132	1.02	1.02	1.02	1.02	1.02	1.02	1.02	1.00	.98	.97	.96	.95	.94	.93	.92	.92	.91	.90	.90	.90	.89	.89	.89	.89	.89	.89
1133	1.06	1.05	1.05	1.04	1.04	1.04	1.04	1.03	1.02	1.00	.98	.97	.96	.95	.94	.94	.93	.92	.92	.91	.91	.91	.91	.91	.91	.90
1134	1.10	1.09	1.08	1.07	1.07	1.06	1.06	1.05	1.05	1.03	1.02	1.00	.98	.96	.95	.94	.94	.93	.92	.92	.91	.91	.91	.91	.91	.90
1135	1.14	1.12	1.11	1.10	1.09	1.08	1.08	1.07	1.07	1.06	1.06	1.04	1.03	1.01	1.00	.99	.98	.97	.96	.95	.95	.94	.94	.94	.94	.93
1136	1.12	1.10	1.09	1.08	1.07	1.07	1.06	1.06	1.06	1.05	1.05	1.05	1.03	1.02	1.01	1.00	.98	.98	.97	.96	.95	.94	.94	.94	.94	.93
1137	1.18	1.15	1.13	1.12	1.11	1.10	1.09	1.08	1.08	1.08	1.07	1.07	1.07	1.05	1.04	1.02	1.01	1.00	.99	.98	.97	.96	.96	.95	.95	.95
1138	1.19	1.19	1.17	1.15	1.13	1.12	1.11	1.10	1.10	1.09	1.09	1.08	1.08	1.08	1.06	1.05	1.03	1.02	1.01	1.00	.99	.98	.98	.97	.96	.96
1139	1.19	1.20	1.20	1.18	1.16	1.15	1.14	1.12	1.12	1.11	1.10	1.10	1.09	1.09	1.09	1.07	1.06	1.04	1.03	1.02	1.01	1.00	.99	.99	.98	.97
1140	1.21	1.21	1.22	1.22	1.19	1.18	1.16	1.15	1.14	1.13	1.12	1.12	1.11	1.11	1.10	1.10	1.08	1.07	1.06	1.04	1.03	1.02	1.01	1.00	.99	.99
1141	1.34	1.27	1.26	1.26	1.25	1.23	1.21	1.20	1.18	1.17	1.16	1.15	1.14	1.14	1.13	1.12	1.12	1.10	1.09	1.08	1.06	1.05	1.04	1.03	1.02	1.02
1142	1.38	1.37	1.30	1.29	1.29	1.28	1.26	1.24	1.22	1.20	1.19	1.18	1.17	1.16	1.16	1.15	1.14	1.14	1.12	1.11	1.09	1.08	1.08	1.06	1.05	1.04
1143	1.43	1.40	1.39	1.33	1.31	1.31	1.30	1.28	1.26	1.24	1.22	1.21	1.20	1.19	1.18	1.17	1.17	1.16	1.15	1.14	1.12	1.11	1.10	1.08	1.08	1.06
1144	1.49	1.45	1.42	1.41	1.35	1.34	1.33	1.32	1.30	1.28	1.26	1.24	1.23	1.22	1.21	1.20	1.19	1.18	1.18	1.17	1.15	1.14	1.13	1.11	1.10	1.09
1145	1.63	1.58	1.53	1.50	1.48	1.42	1.40	1.39	1.38	1.35	1.33	1.31	1.29	1.28	1.26	1.25	1.24	1.23	1.22	1.21	1.20	1.19	1.17	1.16	1.14	1.13
1146	1.73	1.70	1.65	1.60	1.56	1.54	1.48	1.46	1.44	1.42	1.40	1.37	1.35	1.33	1.32	1.30	1.29	1.28	1.26	1.26	1.25	1.24	1.22	1.20	1.19	1.18
1147	1.84	1.78	1.75	1.70	1.65	1.61	1.58	1.52	1.50	1.48	1.46	1.44	1.41	1.39	1.37	1.35	1.34	1.32	1.31	1.30	1.29	1.28	1.27	1.25	1.23	1.22
1148	1.94	1.87	1.82	1.78	1.73	1.69	1.65	1.62	1.56	1.54	1.52	1.50	1.47	1.45	1.42	1.40	1.39	1.37	1.35	1.34	1.33	1.32	1.30	1.29	1.28	1.26
1149	2.65	2.47	2.33	2.23	2.15	2.07	2.00	1.94	1.89	1.82	1.78	1.71	1.71	1.67	1.64	1.61	1.58	1.56	1.53	1.51	1.49	1.47	1.46	1.44	1.43	1.40
1150	3.26	3.06	2.84	2.68	2.55	2.45	2.34	2.26	2.18	2.18	2.04	1.93	1.94	1.90	1.85	1.81	1.77	1.74	1.71	1.68	1.65	1.63	1.61	1.59	1.57	1.55
1151	3.06	2.89	2.77	2.62	2.49	2.39	2.32	2.24	2.16	2.10	2.04	1.97	1.93	1.89	1.85	1.81	1.77	1.74	1.71	1.68	1.65	1.63	1.61	1.59	1.57	1.55
1152	4.49	4.08	3.79	3.57	3.35	3.16	3.01	2.89	2.77	2.66	2.57	2.47	2.40	2.33	2.27	2.22	2.16	2.11	2.06	2.02	1.98	1.94	1.91	1.88	1.85	1.82
1153	5.10	4.59	4.23	3.95	3.74	3.52	3.34	3.18	3.06	2.94	2.82	2.73	2.64	2.55	2.48	2.42	2.36	2.30	2.24	2.19	2.14	2.10	2.06	2.02	1.99	1.96
1154	4.49	4.59	4.23	3.95	3.74	3.52	3.34	3.18	3.06	2.94	2.82	2.73	2.64	2.55	2.48	2.42	2.36	2.30	2.24	2.19	2.14	2.10	2.06	2.02	1.99	1.96
1155	3.77	3.99	4.15	3.88	3.68	3.52	3.38	3.23	3.10	2.98	2.89	2.77	2.70	2.62	2.55	2.47	2.41	2.36	2.31	2.25	2.20	2.16	2.12	2.08	2.04	2.01
1156	3.83	3.36	3.61	3.80	3.60	3.46	3.32	3.21	3.08	2.97	2.87	2.77	2.70	2.62	2.55	2.49	2.41	2.36	2.31	2.26	2.22	2.17	2.13	2.09	2.05	2.02
1157	2.22	3.38	3.04	3.30	3.50	3.35	3.24	3.14	3.05	2.94	2.85	2.76	2.69	2.62	2.54	2.48	2.43	2.36	2.31	2.26	2.22	2.17	2.13	2.09	2.05	2.02
1158	1.40	2.02	3.04	2.79	3.05	3.25	3.14	3.05	2.97	2.91	2.82	2.73	2.66	2.60	2.53	2.47	2.41	2.36	2.30	2.25	2.21	2.17	2.13	2.09	2.05	2.02
1159	1.19	1.33	1.87	2.78	2.59	2.84	3.04	2.96	2.89	2.83	2.78	2.70	2.63	2.57	2.51	2.45	2.40	2.34	2.30	2.24	2.20	2.16	2.13	2.09	2.05	2.02
1160	1.10	1.17	1.29	1.77	2.59	2.44	2.68	2.88	2.82	2.76	2.71	2.67	2.60	2.54	2.49	2.44	2.39	2.34	2.29	2.25	2.20	2.16	2.12	2.09	2.05	2.02
1161	1.00	1.05	1.11	1.23	1.66	2.41	2.28	2.52	2.72	2.67	2.63	2.57	2.56	2.50	2.45	2.40	2.36	2.32	2.27	2.23	2.19	2.14	2.11	2.08	2.05	2.01
1162	.92	.96	1.01	1.07	1.18	1.57	2.26	2.16	2.39	2.58	2.54	2.51	2.48	2.46	2.41	2.37	2.33	2.29	2.26	2.22	2.19	2.15	2.12	2.09	2.06	2.02
1163	.88	.90	.93	.98	1.04	1.14	1.50	2.14	2.05	2.27	2.46	2.43	2.41	2.39	2.37	2.33	2.29	2.26	2.22	2.19	2.15	2.12	2.09	2.06	2.03	2.00
1164	.91	.92	.93	.96	1.00	1.05	1.14	1.47	2.06	1.99	2.20	2.38	2.36	2.34	2.32	2.31	2.27	2.24	2.21	2.18	2.15	2.11	2.08	2.05	2.01	1.97
1165	.80	.85	.87	.89	.91	.95	1.00	1.09	1.40	1.95	1.89	1.61	2.27	2.26	2.24	2.24	2.23	2.20	2.16	2.14	2.11	2.08	2.05	2.02	2.00	1.96
1166	.79	.79	.83	.85	.87	.89	.93	.98	1.06	1.35	1.87	1.82	2.01	2.18	2.18	2.17	2.16	2.16	2.13	2.10	2.08	2.06	2.03	2.01	1.98	1.96
1167	.76	.76	.76	.80	.82	.84	.87	.90	.95	1.03	1.30	1.71	1.75	1.93	2.10	2.10	2.09	2.07	2.07	2.04	2.02	2.01	1.98	1.96	1.94	1.92
1168	.74	.75	.75	.76	.79	.81	.83	.86	.89	.93	1.01	1.26	1.73	1.69	1.87	2.03	2.03	2.13	2.03	2.03	2.01	1.99	1.98	1.96	1.94	1.92
1169	.72	.79	.79	.79	.79	.82	.83	.84	.87	.90	.94	1.01	1.25	1.69	1.66	1.83	1.98	1.98	1.97	1.99	1.99	1.98	1.96	1.94	1.93	1.91
1170	.68	.66	.73	.74	.74	.74	.78	.79	.81	.83	.86	.91	.97	1.20	1.62	1.59	1.76	1.91	1.92	1.92	1.92	1.92	1.92	1.90	1.89	1.88
1171	.68	.69	.67	.73	.73	.74	.74	.77	.78	.80	.82	.86	.89	.96	1.14	1.58	1.55	1.71	1.86	1.86	1.87	1.88	1.88	1.87	1.86	1.85
1172	.70	.68	.69	.67	.72	.73	.74	.74	.76	.78	.79	.81	.84	.88	.94	1.15	1.53	1.51	1.66	1.81	1.82	1.82	1.83	1.84	1.83	1.82
1173	.67	.68	.67	.68	.66	.71	.72																			



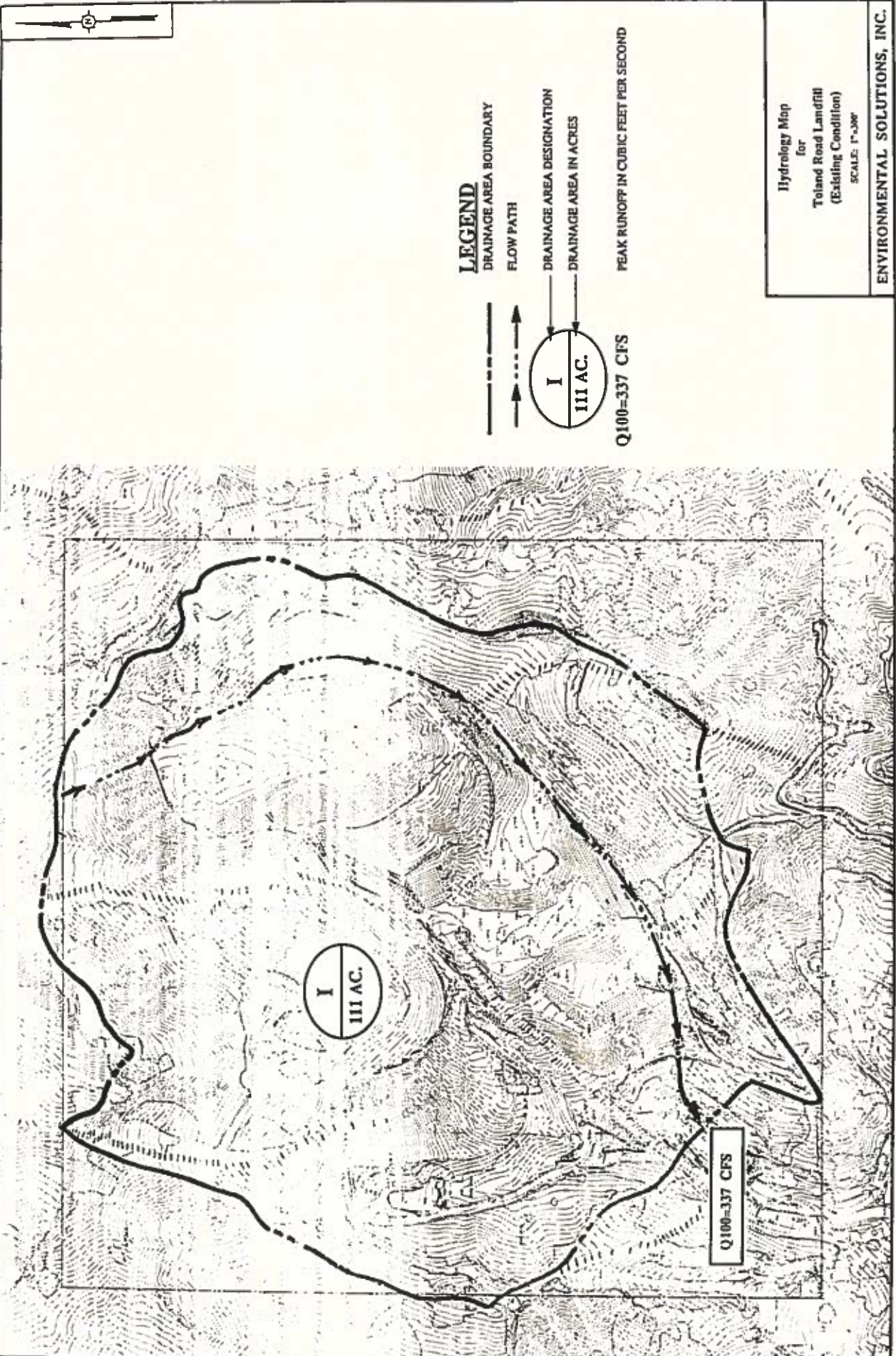
RUNOFF COEFFICIENT CURVE
SOIL NUMBER 1





RUNOFF COEFFICIENT CURVE
SOIL NUMBER 2





LEGEND

DRAINAGE AREA BOUNDARY

FLOW PATH

DRAINAGE AREA DESIGNATION

DRAINAGE AREA IN ACRES

PEAK RUNOFF IN CUBIC FEET PER SECOND

Q100=337 CFS

Hydrology Map
for
Toland Road Landfill
(Existing Condition)
SCALE: 1"=200'

ENVIRONMENTAL SOLUTIONS, INC.



LEGEND

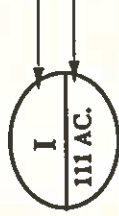
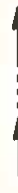
DRAINAGE AREA BOUNDARY

FLOW PATH

DRAINAGE AREA DESIGNATION

DRAINAGE AREA IN ACRES

PEAK RUNOFF IN CUBIC FEET PER SECOND



Q100=444 CFS



Hydrology Map
for
Toland Road Landfill
(Proposed Condition)
SCALE: 1"=300'
ENVIRONMENTAL SOLUTIONS, INC.

**APPENDIX E
WATER AGREEMENT**

Rio Plaza Water Company, Inc.

June 13, 1995

Ventura Regional Sanitation District
Attn.: Mark Zirbel
300 Esplanade Drive, Suite 1200
Oxnard, CA 93030


Subject: Trucked Water Service

For your information and consideration, the Rio Plaza Water Company has in the past and will continue to provide trucked water service from certain hydrants within the system, to public and private organization. For those agencies that need service from time to time at different locations we provide this by a load count. This arrangement can be initiated by a Purchase Order From your organization or by signing and returning a copy of this letter agreement. At the end of each quarter, you will be required to call our business office and report the number of loads of water taken from the system.

The Cost per load for this service is \$5.00.

Should you need additional information please call Frank Brommenschenkel, at 525-4200.

Sincerely,


John Chris Nickel
President

Mark Zirbel
Ventura Regional Sanitation District

Date: _____

1295 Cliff Avenue Fillmore, CA 93015 805-482-6119

APPENDIX F
AGRICULTURAL IMPACT REPORT

AGRICULTURAL IMPACT REPORT

**The Potential Impact on Local Agriculture from the
Proposed Rail•Cycle Bolo Station Landfill, a Class III Municipal Solid Waste
Landfill near Amboy, in San Bernardino County, California**

**Prepared by:
Edwin A. Barnes III, Ph.D.**

April 30, 1993

F-1

EXECUTIVE SUMMARY

Rail•Cycle, a limited partnership between the Atchison, Topeka, and Santa Fe Railway Company, Inc. and Waste Management of North America, has proposed the development of a large capacity (2100 acre), class III municipal solid waste landfill at a site known as Bolo Station in a rural area of the Mojave Desert near Amboy in San Bernardino County, California. A variety of concerns have been raised about the potential impact of the proposed Bolo Station landfill and rail haul component. Many of these concerns were articulated at Bureau of Land Management hearings on February 8, 10, and 11, 1993. Others were identified in written comments submitted in response to the draft environmental impact report/environmental impact statement (DEIR/DEIS). This study addresses the potential impacts on local agriculture operations of the Cadiz Land Company, Inc. (CLCI) from the proposed Bolo Station landfill.

In preparing this report, the author reviewed the data contained in the DEIR/DEIS prepared by Environmental Solutions, Inc., visited the proposed landfill site and surrounding environment (including a drive past the CLCI agriculture operations), reviewed transcripts from Bureau of Land Management hearings dated February 8, 10, and 11, 1993, and reviewed documents submitted in response to the DEIR/DEIS. The author also relied on his own experiences with tree fruit production in the immediate vicinity of the Spadra landfill in Pomona.

The author recognizes that construction of a landfill at Bolo Station will have a significant impact on the area, including increased traffic, noise, dust and other impacts associated with any land development of the area. The author believes that with proper management, however, siting of a landfill at Bolo Station will have minimal, if any, impact on existing or proposed agriculture in the area.

AGRICULTURAL IMPACT REPORT

The Potential Impact on Local Agriculture from the Proposed Rail•Cycle
Bolo Station Landfill, a Class III Municipal Solid Waste Facility

Prepared by:

Edwin A. Barnes III, Ph.D.

April 30, 1993

INTRODUCTION

Rail•Cycle, a limited partnership between the Atchison, Topeka, and Santa Fe Railway Company, Inc. and Waste Management of North America, has proposed the development of a large capacity (2100 acre), class III municipal solid waste landfill at a site known as Bolo Station in a rural area of the Mojave Desert near Amboy in San Bernardino County, California. As stated in the draft environmental impact report/environmental impact statement (DEIR/DEIS), this facility is intended to meet a portion of the solid waste disposal requirements for the Southern California area for 60 to 100 years. The proposal states that initial operations would begin with 3000 tons of waste per day increasing to a maximum of 21,000 tons per day within five to seven years. Waste would be transported by rail in sealed containers using existing rail lines to an onsite container offloading facility. From the offloading facility the containers would be taken to the landfill and emptied. Bureau of Land Management hearings to discuss the proposed landfill project were held on February 8, 10, and 11, 1993. At these meetings, concerns about the impact of the landfill on local agricultural operations of the Cadiz Land Company, Inc. (CLCI) were expressed by representatives of CLCI. In addition, written comments addressing the specific concerns of CLCI were submitted by Keith Brackpool, the Chief Executive Officer in a letter dated March 1, 1993.

SCOPE OF WORK

This study addresses the potential impacts on local agriculture operations of CLCI from the proposed Bolo Station landfill. In preparing this report, the author reviewed the data contained in the DEIR/DEIS prepared by Environmental Solutions, Inc., visited the proposed landfill site and surrounding environment (including a drive past the CLCI agriculture

operations), reviewed transcripts from Bureau of Land Management hearings dated February 8, 10, and 11, 1993, and reviewed documents submitted in response to the DEIR/DEIS. The author also relied on his own experiences with tree fruit production in the immediate vicinity of the Spadra landfill in Pomona.

BOLO STATION SITE DESCRIPTION

The proposed Bolo Station landfill site consists of seven and one-half sections of land (4800 acres) near Bristol Dry Lake, south of the Bristol and Marble mountains. The Bolo Station Landfill is proposed to be located in Sections 5, 8, 9, 15, 16, 17, 21, and the western one-half of Section 22 in Township 5 North, Range 13 East, San Bernardino Baseline and Meridian. Elevations on the site range from 610 feet to approximately 935 feet above mean sea level. Creosote bush and saltbush scrub communities exist on the site's gently sloping alluvial surface.

PROPOSED BOLO STATION LANDFILL DESCRIPTION

The proposed Bolo Station landfill will be a Class III non-hazardous municipal solid waste disposal facility that includes a composite liner system, leachate collection and control system, landfill gas collection system, and litter control. The proposed site has an estimated capacity of 717 million cubic yards or 430 million tons of municipal solid waste, with a service life ranging from approximately 60 to 100 years depending on the annual volume of waste landfilled. The landfill "footprint" design includes division of the 3.3-square mile surface area (2100 acres) into 46 landfill cells.

LAND USE NEAR THE PROPOSED BOLO STATION LANDFILL

The primary land use in the immediate vicinity of the proposed Bolo Station Landfill site is mineral extraction. Bristol Dry Lake adjoins the southwestern boundary of the site and provides an active mining area for sodium chloride and calcium chloride via extraction of brines. The existing agricultural operations of the Cadiz Land Company, Inc. are located approximately five miles from the Bolo Station landfill site. According to testimony of CLCI representatives at the Bureau of Land Management hearings and in the written response to the draft EIR/EIS, CLCI has plans to expand agricultural operations to within one mile of the proposed landfill site.

POTENTIAL IMPACTS FROM DEVELOPMENT OF THE PROPOSED BOLO STATION LANDFILL

A variety of concerns have been raised about the potential impact of the proposed Bolo Station landfill and rail haul component. Many of these concerns were articulated at Bureau of Land Management hearings on February 8, 10, and 11, 1993. Others were identified in written comments submitted in response to the DEIR/DEIS. The following is a summary of those concerns:

- potential contamination of groundwater sources
- depletion of available groundwater resources that are now used or could be used for future agriculture development
- increased levels of dust
- increased vehicular traffic, noise, and vehicle emissions
- spread of airborne trash
- visual impact
- odors from trash and landfill gas
- loss or erosion of pristine desert environment
- endangered species impacts/loss of habitat
- bird, rodent, insect, disease infestations of fruit crops
- public health and safety risks
- seismic risks
- gas migration off site
- flood and erosion risks

The author recognizes that there may be potential impacts on the quality of life associated with the construction and operation of the Bolo Station landfill. Many of these impacts, however, would result from any new development in this area. The scope of work for this study was to address the potential impact of the proposed landfill on agriculture in the vicinity of the proposed Bolo Station landfill, specifically the agricultural operations of the Cadiz Land Company, Inc. The author, therefore, has categorized concerns into three areas based upon opinion and professional judgement as to the potential impact on agriculture. Only those areas considered by the author to have a potential impact on agriculture in the vicinity of the proposed Bolo Station Landfill are considered in detail.

1. No significant impact on agriculture

It is recognized that some of the following may result from the construction and operations of the Bolo Station Landfill and may create a nuisance or an impact on the quality of life for local residents and workers, but it is the author's opinion that the following will have no impact on existing agriculture operations or the proposed expansion of operations of the Cadiz Land Company, Inc.

- increased vehicular traffic, noise, and vehicle emissions
- spread of airborne trash
- visual impact
- odors from trash and landfill gas
- loss or erosion of pristine desert environment
- endangered species impacts/loss of habitat
- public health and safety risks
- seismic risks
- gas migration off site
- flood and erosion risks

Many of these are common nuisance concerns associated with any land development and are not necessarily unique to a landfill operation. In fact, several of these same concerns are commonly expressed about farming operations in California.

2. Minimal, if any impact on agriculture

- increased levels of dust
- bird, rodent, insect, and disease infestations of fruit crops

3. Potential impact on agriculture

- potential contamination of groundwater sources
- depletion of available groundwater resources that are now used or could be used for future agriculture development

Minimal, if any, impact on Agriculture

Several officers of the Cadiz Land Company, Inc. stated that the proposed Bolo Station landfill and their agricultural operations are incompatible. It is the experience of the author that this is not the case. California State Polytechnic University, Pomona (Cal Poly), with a population of nearly 20,000 students, faculty, and staff, is located adjacent to the Spadra landfill, a class III sanitary landfill established in 1957 to serve the disposal needs of the San Gabriel and Pomona valleys. The landfill handles about 520 vehicles each day and accepts on the average about 2,800 tons of refuse daily.

Cal Poly farms nearly 700 acres in close proximity to the landfill, including 50 acres of citrus, avocados, grapes, and many other tree fruits. About the only citrus fruit that Cal Poly is unable to grow successfully is desert grapefruit, because it is not hot enough to attain the sugar content to meet legal standards for commercial sales. The closest orchards are located less than one-quarter mile from the entrance to the landfill. The furthest orchards are located approximately one mile from the working area of the landfill. The author served for five years as the university farm manager for the fruit industries program and managed the university orchards. He believes that the landfill has had no affect on campus orchards or any other crop. He has never observed any negative effects on crop yield or quality, fruit size, color, shape, or flavor that could be attributed to the presence of the landfill. Furthermore, the author has never heard of any health or safety issues among the campus population that was attributed to the landfill.

Frequent watering during the daily landfill operations at Spadra keeps the dust to a minimal and acceptable level. At present, the Spadra landfill is in the process of expansion. More than 3 million yards of earth are being moved and stockpiled during construction of the expansion. Heavy watering of the site has kept dust to a minimum. There is very little fugitive dust. Dust from the unpaved internal roads within the campus farm is a much greater problem for agricultural operations at Cal Poly than fugitive dust from the Spadra landfill.

Cal Poly irrigates 95% of the campus landscape and farming operations with tertiary treated sewage effluent from the Pomona Water Reclamation Plant, and have been doing so since 1965. We have never seen negative impacts on our crops from irrigation with the treated effluent. Several years ago the author conducted a study with Dr. Gregory J. Partida, an entomologist at Cal Poly who works with tree fruit crops, on the impact of landfills on agricultural operations at several other sites in Southern California.

On September 24, 1990 Dr. Partida visited the Riverside landfill site in the Highgrove area of Riverside County. The area around the landfill consists of contrasting activities. New home construction was taking place throughout the area, replacing many established orchards. On the hillsides were large homes overlooking the site, and citrus orchards existed above and around the disposal site. Orchards near the site were checked for dust problems and insect and mite populations. Many of the trees (grapefruit and oranges) in the orchards adjacent to the site were covered with dust. However, insect populations were at low levels. No mites were found but small isolated populations of California Red Scale and Cottony Cushion Scale were encountered. Grapefruit trees within 3 tenths of a mile from the disposal site entrance and weight station were not covered with any more dust or dirt than trees 1 mile away and in the middle of the orchards. No agricultural problems were apparent. The orchards appeared to be, for the most part, well managed. The old trees (40 years plus) were in excellent condition and were showing an excellent fall flush.

On September 18, 1990, a telephone conversation was conducted with Dr. Eldon Reeves, Entomologist, Agricultural Commissioner's Office for the County of Riverside. Dr. Reeves was asked about the insect and mite problems associated with the Riverside landfill site on Pigeon Pass Road in the Highgrove area. This site is over the hill from the University of California at Riverside. This disposal site has been in the area for the past 35 to 40 years. The area around the landfill was planted in citrus orchards. Many of the orchards in the area were planted in the 1920's and 1930's. According to Dr. Reeves, who has been with the county Agricultural Commissioners Office since the early 1970's, there has not been any major insect or mite problems in the area around the disposal site. In his opinion, any pest problems that occurred in the area were not related to any activities taking place at

the landfill. Dr. Reeves pointed out that he lived over the hill from "the dump", within 1 to 2 miles of the site, and that he never noticed any effects in his neighborhood that could be attributed to daily activities taking place during the normal operations of the landfill.

A personal interview by Dr. Partida with Alan Washburn of Washburn & Sons, Citrus Pest Control on September 24, 1990 confirmed the information provided by Dr. Eldon Reeves. Mr. Washburn told Dr. Partida that Washburn pest control manages 600 acres in the local area. The company also managed acreage in the Hemet area. Mr. Washburn had never seen pest problems that he could attribute to the landfill. The Company had been farming in the local area since the 1920's. The company's philosophy was to use integrated pest management techniques to control pest problems. This included releasing parasites and predators and spraying insecticides only when it was absolutely necessary. All of the citrus produced in the area was for the export market so they had to be very careful of the pesticides that they used in the orchards. They generally tried to use citrus oils to control hot spots of pest populations. Mr. Washburn had never seen any problems caused by the landfill. The latest pest problems he attributed to the recent freezes in the area and the continued drought. They still needed to watch for California Red Scale and, on occasion, citrus red mite.

Before leaving the Highgrove area a visit was paid to the L. V. Brown Estates citrus packinghouse. Mr. Weatherwax was the packinghouse manager and has been in the Riverside area most of his life. His packinghouse processed a portion of the citrus fruits produced in the local area, and he had never seen any problems on the fruit harvested in the area caused by activities at the landfill. He had never seen any landfill effects on crop yields or quality. He stressed that about 90% of the local crops go to the export market, which is a very strict and demanding market.

□ Increased levels of dust

Development of a landfill at the Bolo Station site may have a minimal impact on agriculture in the immediate area of the proposed landfill, if no efforts are made to control fugitive dust due to landfill construction, soil stockpiling and the daily operations of the landfill. Dust can reduce photosynthesis, and can create insect and disease related problems, all of which can reduce yields if not properly managed. Current agricultural

operations of the Cadiz Land Company, Inc. are, however, located nearly five miles from the proposed landfill site. Even if agricultural operations are expanded to within one mile or less of the proposed landfill, it is the opinion of the author that the impact on agricultural operations from fugitive dust will be minimal or none. Frequent watering during the daily landfill operations should keep the dust to a minimal and acceptable level. As stated previously, dust from the unpaved internal roads within the Cal Poly campus farm is a much greater problem for agricultural operations at Cal Poly than fugitive dust from the Spadra landfill which is located less than a mile from the campus orchards.

Recommended MITIGATION MEASURES:

The potential impacts from dust can be mitigated significantly by proper management of the site to reduce fugitive dust. This includes creation of berms, proper design and placement of internal roads, paving access roads to the working deck, and frequent watering and/or use of dust abatement products during landfill construction, stockpile and daily cover operations. Furthermore, imposing speed limit controls on vehicles on-site and curtailing operations during occasional high winds will help minimize the fugitive dust problems. Early establishment of landscaped visual berms will also reduce the incidence of fugitive dust from the site.

Bird, Rodent, Insect, and Disease Infestations of Fruit Crops

Concerns were expressed that placing a "dump" in this area would introduce rodents, seagulls, ravens, flies and other undesirable disease vectors to an area where they do not currently exist. It was stated that "Mediterranean fruit flies and poinsettia white flies may be transported to the landfill in the trash and end up on our site". The author recognizes that there is a remote chance that an insect pest could be introduced to the Bolo Station landfill site in trash hauled from outside the area. But, the author believes this to be a very remote chance. It is equally possible that a visitor or a worker for Cadiz Land Company, Inc. could transport disease organisms or insects on or in clothing, vehicles, or infested fruit to the area. According to the DEIR/DEIS, the very nature of the proposed rail haul and landfill operation should ensure that the chance of this occurring will be minimal. The compacted and containerized refuse will be buried in the landfill with little exposure to the outside elements. Temperatures inside the rail cars may even exceed those

temperatures that can be endured by insects. The author believes that normal landfill operations involving compaction and daily cover will reduce this minimal risk to an insignificant level.

Birds are a common problem associated with landfills in California and elsewhere, but can be controlled successfully with a pole and wire system that is in common use at other sites.

Recommended MITIGATION MEASURES:

Rapid compaction and cover of refuse emptied from containers should help mitigate the possibility of potential insect or disease vectors leaving the site. A monitoring and trapping system for insects should be implemented to verify that insects are not being introduced to the site. This program should be initiated prior to the disturbance of the site to determine the nature of the native populations of insects. A typical system would utilize attractants and baits, sex pheromones, and sticky cards placed in bushes, trees, poles and other areas. A pole and wire system or some other effective alternative for control of seagulls should be implemented and maintained on a daily basis.

Potential Impact on Agriculture

□ Contamination of groundwater sources

Potential contamination of groundwater was identified as a concern by Cadiz Land Company, Inc., and the Cargill Salt Division. As stated in the DEIR/DEIS, the proposed landfill at Bolo Station will incorporate the best available control technologies to prevent groundwater contamination. This includes installation of a composite liner consisting of a clay layer combined with a synthetic geomembrane, a leachate collection system, and a gas control system. Concerns about the integrity and longevity of liners, leachate and gas control systems are beyond the scope of this study, however, and beyond the technical abilities of the author to comment on.

The author does wish to state that groundwater contamination is a significant environmental problem throughout the world, and that every measure should be taken by Rail•Cycle to assure that the best possible protection system be installed and maintained to prevent leaks which could lead to potential groundwater contamination. The author also wishes to state that

groundwater contamination from agricultural chemicals (pesticides and fertilizers) used in farming operations poses a significant problem throughout the western United States and elsewhere around the world. Nitrate and pesticide contamination of groundwaters is a common problem associated with modern farming practices.

- depletion of available groundwater resources that are now used or could be used for future agriculture development

Competition for groundwater between local agricultural operations, the mineral extraction and landfill operations may have an impact on the amount of water available from the groundwater resources for expanded agricultural operations.

CONCLUSION

Numerous concerns have been raised about siting a new Class III municipal solid waste landfill at the Bolo Station site. The author recognizes that there may be significant impacts associated with the construction and operation of a landfill at Bolo Station, similar to the impacts that would be attributed to any development in the area. The landfill operations described in the DEIR/DEIS including compaction and daily cover of refuse, frequent watering of the working deck, in conjunction with the proposed environmental control systems should ensure that the proposed Bolo Station Landfill will have a minimal impact on existing or proposed agriculture operations in the area.

REFERENCES

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