



ANTELOPE VALLEY PUBLIC LANDFILL CUP

RESPONSE TO COMMENTS/ FINAL EIR

(SCH #1990010988)

Prepared for:
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March 2011



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Lead Agency:

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1.0 INTRODUCTION

1.1 ORGANIZATION

This document is the Final Environmental Impact Report (Final EIR) for the Antelope Valley Public Landfill (AVPL) project. It also serves as the Response to Comments on the December 2005 Draft EIR and the May 2010 revised and recirculated sections (i.e., the “Amendment” to the Draft EIR). This document relies on and references information available in the City’s public record related to the project, Draft EIR and Amendment to the Draft EIR and is an informational document that has been prepared by the City of Palmdale as lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.).

According to the CEQA Guidelines (Section 15132), a Final EIR must consist of the following elements:

- The Draft EIR or a revision of that draft.
- Comments and recommendations received on the Draft EIR either verbatim or in summary.
- A list of persons, organizations, and public agencies that commented on the Draft EIR.
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- Any other information added by the Lead Agency.

This Final EIR serves to complete the environmental document process required by CEQA and includes the following information:

Section 1.0 – Introduction: This section provides an introduction to the Final EIR and a list of comment letters received on the Draft EIR and Amendment to the Draft EIR.

Section 2.0 – December 2005 Draft EIR Comment Letters and Responses: This section provides a list of persons commenting on the Draft EIR, copies of the written comments (numerically coded for reference), and the responses to those comments put forth by the City of Palmdale.

Section 3.0 – May 2010 Amendment to the Draft EIR Comment Letters and Responses: This section provides a list of persons commenting on the Amendment to the Draft EIR, copies of the written comments (numerically coded for reference), and the responses to those comments put forth by the City of Palmdale.

Section 4.0 – Changes to the December 2005 Draft EIR and May 2010 Amendment to the Draft EIR: This section includes all corrections and additions to the December 2005 Draft EIR text

and May 2010 Amendment to the Draft EIR text, including changes made as a result of comments received on either the Draft EIR or the Amendment to the Draft EIR. Any changes in text are indicated by underline/strikeout revision.

Section 5.0 – MMRP: This section provides the Mitigation Monitoring and Reporting Program (MMRP) to ensure that the mitigation measures identified in the Draft EIR and Amendment to the Draft EIR are implemented to reduce or avoid the significant adverse environmental impacts of the project.

Although not included within the cover of this Final EIR, the Draft EIR and Amendment to the Draft EIR, as issued for public review on December 14, 2005 and May 24, 2010, respectively, are incorporated herein by reference and are revised as shown in Section 4.0. Collectively, this document, and the Draft EIR and Amendment to the Draft EIR, as revised by Section 4.0 herein, constitute the Final EIR.

1.2 ENVIRONMENTAL REVIEW PROCESS

The City of Palmdale issued a Notice of Preparation of Draft EIR (NOP) on March 1, 2004, announcing preparation of an environmental document for the proposed Antelope Valley Public Landfill project. The NOP with CEQA Initial Study was sent to various persons, agencies, and organizations that would likely be interested or affected by the proposed project. Additionally, a notice was published notifying agencies and persons about the environmental process, where to review copies of the NOP/IS, and how to participate in the process. A project scoping meeting was held at the City of Palmdale on March 29, 2004 to solicit input and comments from the public. However, no member of the public attended the scoping meeting and no comments were raised at that meeting.

A total of ten comment letters, including a letter from SCAG which did not raise any environmental issues, were received during the NOP review period, which began on March 1, 2004 and ended on April 2, 2004. The comments on the NOP were considered by the City, as lead agency, in determining the scope of the issues to be addressed in the environmental document.

Upon completion and finalization, the Draft EIR was circulated for review and comment during a 45-day review period, beginning on December 14, 2005 and ending on January 27, 2006. A total of nine comment letters and the OPR transmittal letter were received on the Draft EIR.

Subsequent to the preparation of the Draft EIR in December of 2005, the City of Palmdale proposed to widen Tierra Subida Avenue between City Ranch Road and Cactus Drive (City Project Number 482). Since the City Project Number 482 would affect the proposed project site's existing access at the intersection of City Ranch Road and Tierra Subida Avenue, a sight distance evaluation was conducted (JT Engineering 2010). Based on the sight distance evaluation, the project engineer recommended the construction of a new frontage road

connecting to Tierra Subida at Rayburn Road as the future access to the project site. In addition, with the passing of the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32: California Health and Safety Code Division 25.5, Section 38500, et.seq., or AB 32), the City of Palmdale decided to incorporate a greenhouse gas (GHG) emission and climate change analysis into the Draft EIR. The additional information resulted in the preparation of the Amendment to sections of the Draft EIR. The Amendment to the Draft EIR was circulated for 45-days from May 24, 2010 to July 7, 2010. A total of eight comment letters were received on the Amendment to the Draft EIR.

A Planning Commission hearing will be held on April 14, 2011 to take public testimony regarding the EIR prepared for the proposed project and related project Conditional Use Permit (CUP) at which time the Planning Commission will hear additional public comment and possibly take action to certify the EIR and approve the project. The City Council will only consider the project on any appeal after the Planning Commission has either approved or denied the project.

1.3 COMMENT LETTERS

During the original public review period on the Draft EIR a total of ten comment letters on the Draft EIR were received by the City of Palmdale. The comment letters were received from:

1. Southern California Association of Governments, Brian Wallace – January 9, 2006.
2. County of Los Angeles, Department of Public Works, Donald Wolfe – January 11, 2006.
3. State of California, Health and Human Services Agency, Department of Health Services, Joseph E. Crisologo – January 11, 2006.
4. California Integrated Waste Management Board, Raymond M. Seamans – January 12, 2006.
5. Steve Schirmbeck, Local Citizen – January 14, 2006.
6. State of California, Public Utilities Commission – January 24, 2006
7. State of California, Business, Transportation and Housing Agency, Department of Transportation, District 7, Cheryl J. Powell – January 24, 2006.
8. County of Los Angeles, Department of Public Works, Donald L. Wolfe – January 26, 2006.
9. California Regional Water Quality Control Board, Lahontan Region – January 27, 2006.
10. State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, Terry Roberts – January 30, 2006

The City's responses to these comment letters are contained in Section 2.

During the public review period for the Amendment to the Draft EIR, eight comment letters, including the State Clearinghouse letter, were received by the City of Palmdale. The comment letters were received from:

11. Department of Resources Recycling and Recovery, Raymond M. Seamans – June 10, 2010
12. California Clean Energy Committee, Eugene S. Wilson – July 3, 2010

13. California Regional Water Quality Control Board, Lahontan Region, Jan M. Zimmerman – July 7, 2010
14. County of Los Angeles, Department of Public Works, Pat Proano – July 7, 2010
15. State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, Scott Morgan – July 8, 2010
16. County of Los Angeles, Department of Public Works, Pat Proano – July 15, 2010
17. County of Los Angeles, Public Health, Gerry Villalobos – August 5, 2010
18. County of Los Angeles, Fire Department – August 11, 2010

1.4 PROJECT SUMMARY

The Draft EIR for this project addressed the environmental issues, alternatives, and impacts associated with implementation of the proposed project. As part of the proposal, a new CUP is requested that would be issued by the City of Palmdale. The existing County CUP would be replaced by the City of Palmdale CUP with the City of Palmdale as the lead agency. The proposed CUP includes enlarging the landfill refuse foot print to 125 acres by reconfiguring the two approved landfills into one contiguous disposal area, updating the legal boundary of the entire facility to 185 acres to reflect the current property boundary subsequent to a lot line adjustment approved in 1999, and a proposed increase to the net permitted daily limit to 3,600 tpd of solid waste for disposal in the landfill. The project would also combine the two existing Solid Waste Facility Permit's (SWFP's) into one permit issued by the LEA and concurred by the Department of Resources Recycling and Recovery (CalRecycle). The two existing Waste Discharge Requirements (WDR's) will also be combined into one revised WDR permit covering the entire site and issued by the Lahontan Regional Water Quality Control Board (RWQCB). The proposed project will consist of the following components:

- Reconfigure the two landfills into one contiguous disposal area of 125 acres, updating the legal boundary to reflect the current property boundary of 185 acres and obtaining one Solid Waste Facility (SWF) and CUP permit for the entire area.
- Enlarge the aggregate 114-acre refuse footprint by 11 acres to 125 acres total by incorporating the gap between Landfill I and Landfill II.
- A proposed increase in the permitted daily intake of solid waste (i.e., refuse to be disposed of in the landfill) from 1,800 tons per day (tpd) to 3,600 tpd. These tonnage figures exclude recyclables and materials used for Alternative Daily Cover (ADC) and beneficial use.
- Limit the daily intake of TPH regulated soils to a maximum of 15 percent of the permitted daily intake for solid waste.

- Increase the “total” daily intake of refuse and recyclables (including ADC) from a currently permitted 3,564 tpd (assumed “total” intake in 1993 Mitigated Negative Declaration) to a peak of 5,548 tpd (assumed “total” intake for the analysis included in this EIR).
- A proposed modification to the maximum height of the combined landfills to 3,200 above mean sea level (msl).
- Proposed construction of ancillary facilities, including: two desilting basins; erosion protection along the north bank of Anaverde Creek, acceptable to the City Engineer; a revised site access including construction of a frontage road to connect with City Ranch Road and intersect Tierra Subida at Rayburn Road and create a 4-way signalized intersection and construct the remaining access road along the R-5 dedicated right-of-way; an additional truck scale; a recycling drop-off/transfer center; and the relocation of the existing Southern California Edison’s electric transmission lines and light duty poles to south side of property either “on-site” or “off-site.”
- Revise hours of operation for waste acceptance to 6:00 a.m. to 8:00 p.m. for all users. The present permitted operating hours for receipt of refuse are between 6:00 a.m. and 5:00 p.m. for waste haulers and transfer trucks and 8:00 a.m. and 4:45 p.m. for the public.
- Installation of a liner, leachate collection and removal system (LCRS), drainage control and surface water management system, groundwater monitoring system, and horizontal gas collectors in the expansion area and remaining combined landfill footprint area. The proposed liner system will be overlapped (per requirements of RWQCB) with existing liners to provide a continuation of environmental protection of groundwater in accordance with state regulations.

The Draft EIR was prepared in accordance with CEQA as amended (Public Resource Code Section 21000 et seq.) and the State Guidelines for implementation of CEQA (CEQA Guidelines) as amended (Title 14 of the California Code of Regulations, § 15000 et seq.). The EIR complies with the rules, regulations, and procedures of CEQA Guidelines Section 15080 through 15097 regarding the public review and comment process for an EIR.

The EIR analyzed the potentially significant environmental impacts of the proposed project. The potential cumulative impacts, that is, the effects of the proposed project in conjunction with past, present, and reasonably foreseeable future projects in the surrounding area, were also analyzed. The EIR identified alternatives to the proposed project and discussed possible ways to reduce or avoid the potentially significant environmental impacts. The applicant has decided to pursue City staff’s recommendation of the Reduced Project Alternative (the 1,800 TPD disposal option), which is the current CUP-approved tonnage, as the environmentally superior alternative.

For purposes of providing a summary of the Draft EIR/Amendment to the Draft EIR, the project impact summary (Table 1-1 of the Draft EIR/Amendment to the Draft EIR) is included herein, which shows project-specific and cumulative significant impacts, the level of significance, and the mitigation measures recommended in the Draft EIR/Amendment to the Draft EIR. The project summary matrix incorporates the editorial changes to eight (8) mitigation measures (4.1-1, 4.2-1, 4.2-4, 4.4-4, 4.5-1, 4.6-4, 4.7-1, and 4.8-1); six (6) impacts (4.1-2, 4.3-4, 4.4-1, 4.5-1, 4.5-5, and 4.5-6); and revised air quality mitigation measures (4.2-5 through 4.2-7). However, Section 4.0 of this Final EIR specifically includes the changes in marked text and the errata pages to the December 2005 Draft EIR and May 2010 Amendment to the Draft EIR.

**Table 1-1
Project Impact Summary**

Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
Draft EIR		
4.1 Earth Resources		
<p>Impact 4.1-1 – Surface Fault Rupture Potential for future surface rupture at the AVPL along the trace of the San Andreas Fault Zone. <i>Less than significant with regulation compliance.</i></p>	<p>No mitigation required.</p> <p>Waste containment structures for the proposed landfills expansion are setback from the mapped trace of the San Andreas Fault, as shown in Figure 3-11, Fill Plan C. A setback meets the requirements of Title 27 California Code of Regulations (CCR) for Class III landfills.</p>	
<p>Impact 4.1-2 – Earthquake Ground Shaking Potential for ground shaking resulting in significant impacts, including leachate migration, slope failure, seismic settlement, damage to drainage facilities, monitoring wells, the new landfill entry road, and other landfill installations. <i>Less than significant with regulation compliance and mitigation.</i></p>	<p>The proposed landfill expansion and all ancillary support facilities will be designed in accordance with CCR, Title 27, Division 2, Seismic Requirements.</p> <p>4.1-1 Prior to the issuance of the Waste Discharge Requirements (WDR's) and approval of the Joint Technical Document (JTD) for the project by the Lahontan Regional Water Quality Control Board, the proposed design and supporting engineering analysis of the landfill's containment structures shall be reviewed and approved by the RWQCB to ensure the design complies with State regulations pursuant to California Code of Regulations, Title 27, Division 2. The applicant shall demonstrate to RWQCB satisfaction that the landfill liner and leachate collection system have been designed to preclude failure and will resist the maximum seismic shaking</p>	Project Specific

* Many of the project impacts are reduced by the project's required compliance with landfill design and operating regulations, city/agency standards and regulations related to construction/development projects and/or by the incorporation of project design measures as noted in this table. Only the proposed project mitigation measures have been numbered to facilitate the distinction between mitigation measures, regulation compliance, and design measures.

Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
	<p>expected at the site based on risk assessment. Further, the design shall demonstrate that the final slopes will be stable under both static and dynamic conditions to protect public health and safety and prevent damage to the facility such that no significant impact to the environment will occur. The liner design, as proposed in Appendix B of the EIR, shall be modified or refined if necessary based on final engineering analysis and review by the RWCQB to ensure that the approved landfill design will mitigate impacts to a less than significant level.</p> <p>The landfill containment structures shall be constructed as approved by the RWQCB. During on-going landfill construction, geologic mapping of rock and soil exposed in future excavations shall be completed. Information on rock type and any exposed folds, fractures and folds will be collected. Permanent cut slopes shall be observed by a qualified geologist to check for adverse bedding, joint patterns, or other geologic features that may impact the approved landfill design. Where necessary, the permanent cut slopes shall be constructed to ensure their stability. The geologic maps will be included with the construction reports for each portion of the constructed landfill. The reports will be submitted to the LEA and Lahontan RWQCB.</p> <p>4.1-2 Earth moving operations shall be observed, and the placement of fill shall be tested by a qualified geotechnical engineer during ongoing landfill operations. Observation and testing will ensure fill placements are</p>	

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
	consistent with the approved landfill design.	
<p>Impact 4.1-3 – Liquefaction Potential for liquefaction in the expansion and proposed ancillary facilities areas south of disposal area, where some layers of saturated alluvial soils have been identified. Site specific liquefaction studies by GCE (2000) indicate the potential for liquefaction in the expansion area is low due to high recorded blow counts in the alluvial soils and substantial confining loads under the refuse fill. Site specific liquefaction studies by Gainico (2000 & 2002) concluded that the potential for liquefaction in the ancillary facilities area is low because groundwater is more than 50 feet deep in these areas. Less than significant.</p>	No mitigation required.	Project Specific
<p>Impact 4.1-4 – Expansive Soils Potential for expansive soils in the expansion area where claystone and silty claystone portions of the Anaverde Formation occur. Less than significant with design/construction measures.</p>	Design/construction measures (i.e., removal of weathered expansive soils, isolation of surface water, and substantial over burden pressure on any remaining expansive soils) will mitigate potential impacts.	Project Specific
<p>Impact 4.1-5 – Slope Stability Potential for slope failure of the landfill slopes during severe seismic activity.</p>	Mitigation Measures 4.1-1 and 4.1-2, above. All slopes and pertinent attendant facilities shall be designed to	Project Specific

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
<i>Less than significant with mitigation and regulation compliance.</i>	applicable CCR, Title 27 Division 2, Seismic Requirements and City of Palmdale adopted building code, as applicable. Provision for the repair of the landfill cover system is provided through the Financial Assurance requirements of Section 22210 of CCR, Title 27.	
Impacts 4.1.6 – Cumulative Potential cumulative earth resources impact. The geotechnical issues discussed above are site-specific and will be limited to within the development boundaries of the project site. <i>Less than significant.</i>	No mitigation required.	Cumulative impacts
4.2 Air Quality		
Impact 4.2-1 – Short-term Construction Potential for construction related impacts including the potential for PM-10 significance thresholds to be exceeded. The Mojave Air Basin is non-attainment for PM-10. <i>Less than significant with mitigation and regulation compliance.</i>	The landfill will continue to comply with AVAQMD Rule 402 and 403 prohibiting creation of a nuisance from dust. 4.2-1 Because the grading/disturbance of more than 10 acres will cause the daily PM-10 thresholds to be exceeded, construction of landfill ancillary facilities (new frontage road, R-5 access, and the Anaverde Creek erosion protection) shall not exceed 10 acres of grading on any given day. 4.2-2 The internal haul road from the scale house into the landfill shall be incrementally paved with asphalted concrete or equivalent as depicted on Figure 4.2-1 . 4.2-3 Because of the potential for fugitive dust emissions from	Project Specific

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
	<p>the proposed landfill to cause a public nuisance or exacerbate PM₁₀ non-attainment status within the Antelope Valley, dust generated by project activities shall be kept to a minimum and prevented from dispersing offsite. The project shall comply with all best available control measures of existing AVAQMD Rule 403, or any of its possible near future control measure enhancements. The project size is not sufficient to require preparation and approval of a formal fugitive dust control plan (DCP) as it is less than 100 acres of simultaneous disturbance. However, because of the non-attainment status of the air basin and the cumulative significance of continued elevated levels of PM-10 emissions, a DCP shall be prepared and submitted to the AVAQMD for their review and approval. The elements of such a plan are already part of site operational procedures. The preparation and implementation of a dust control plan is designed to create a CUP compliance evaluation mechanism to further protect the nearest existing and future residents. The elements of such a plan would likely include:</p> <ul style="list-style-type: none"> a. Water trucks or fixed sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. b. Areas to be graded or excavated shall be watered before commencement of the grading or excavation operations. Application of water must penetrate sufficiently to minimize fugitive dust during grading activities. 	

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
	<ul style="list-style-type: none"> c. All graded and excavated material, exposed soil areas, and active portions of the landfill, including on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary to prevent fugitive dust from leaving the landfill site. d. Signs shall be posted on-site limiting traffic to speeds of 15 mph or less on unpaved roads and 25 mph on paved roads. e. During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. 	
<p>Impact 4.2-2 – Long-term Mobile Source Exhaust Emissions Mobile source project related exhaust emissions (see Table 4.2-4) will result from on- and off-site heavy equipment, truck hauling operations, and employee commuting. Less than significant with regulation</p>	<p>No mitigation required. The project will continue to comply with California Air Resources Board on- and off-road equipment source control programs and with the California EMFAC emission control program.</p>	<p>Project Specific</p>

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
<i>compliance.</i>		
<p>Impact 4.2-3 – Long-term Operational Potential for PM-10 emission increases related to excavation hauling, spreading, and compaction of cover material. <i>Less than significant with mitigation and regulation compliance.</i></p>	<p>The landfill will continue to comply with AVAQMD Rules 401, 402, and 403 prohibiting creation of visible emissions and/or a nuisance from dust.</p> <p>Mitigation Measures 4.2-1, 4.2-2, and 4.2-3 above. No additional mitigation measure required.</p>	Project Specific
<p>Impact 4.2-4 – Long-term Landfill Gas Potential impact related to increased subsurface landfill gas production. <i>Less than significant.</i></p>	<p>No mitigation required. The landfill will continue to comply with AVAQMD Rule 1150.1 and New Source Performance Standards (NSPS) governing control of gaseous emissions from landfills. The LFG collection/disposal system constitutes best available control technology (BACT) and will be expanded as necessary consistent with Title 27 of CCR.</p>	Project Specific
<p>Impact 4.2-5 – Long-term Odor Potential for additional landfill gas from increased daily tonnage to cause odor. <i>Less than significant with mitigation and design measures/ improvements to ensure regulation compliance.</i></p>	<p>Implementation of project design measures / components (i.e., landfill gas system), developed consistent with Title 27 and AVAQMD Rules 401 and 402, will reduce the potential odor impacts to less than significant levels.</p> <p>4.2-4 If an odor nuisance problem should develop, appropriate control measures shall be employed such as applying additional cover material or more frequent application of the cover material to seal the surface, or adjustments to the landfill gas collection system.</p>	Project Specific
<p>Impact 4.2-6 –GHG Emissions Potential conflict with AB-32 or potential to generate GHG emissions that may have a significant impact on climate</p>	<p>The recommended mitigation measures to reduce hauling and disposal related GHG exhaust emissions are:</p> <p>4.2.5 The applicant shall include the following set of measures</p>	Project Specific & Cumulative

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
<p>change. <i>Less than significant with mitigation.</i></p>	<p>that, working together, will reduce operational greenhouse gas emissions of the project and the project’s potential effects on climate change:</p> <ul style="list-style-type: none"> • Hauling trucks shall be powered by liquefied natural gas (LNG), Compressed Natural Gas (CNG), or ultra-low sulfur diesel fuel. • Idling of heavy-duty hauling trucks in excess of five minutes, and idling of off-road mobile sources of any type in excess of five minutes shall be prohibited. • When new landfill equipment is purchased by WMI, new commercially available equipment shall be purchased that exceeds California’s emission standards in effect at the time of purchase. • Onsite vehicles and equipment shall be properly maintained by being serviced at least every 90 days and once annually in compliance with Department of Transportation (DOT) requirements. • Operation equipment used for the proposed project shall use clean alternative (i.e., non-diesel/biodiesel) fuels, or use equipment that has been retro-fitted with diesel particulate reduction traps or equivalent control technology, using equipment certified by CARB. • For the purchase of primary heavy duty, diesel powered landfill equipment at WMI (dozers and compactors), if equipment meeting California’s 2014 	

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
	<p>emission standards for off-highway, heavy duty diesel equipment is commercially available before 2014, WMI shall purchase such equipment as older equipment is replaced.</p> <p>4.2-6 Within one year of project approval, the applicant shall develop, and submit to the City, a Greenhouse Gas Reduction Plan that demonstrates how the AVPL will achieve by 2020 a reduction in annual GHG emissions such that emissions are no greater than 10 percent below 2006 levels and will meet or exceed all regulatory requirements related to GHG control. The Reduction Plan shall include one or more of the following measures, or combination thereof:</p> <ul style="list-style-type: none"> • Use of alternative fuels, including but not limited to CNG, LNG, B-5 or B-20 Biodiesel in on-site equipment and in heavy duty truck fleets (and as a condition of future contract approvals if third-party haulers are used); • Use of hybrid, LNG, CNG or other similarly effective alternative fuel in hauling trucks; • Use of Best Available Control Technology and BMPs when designating new waste disposal cells (e.g., by designing any additional gas collectors in bottom liner systems) and to increase gas combustion capacity/improve flare destruction efficiency; • Begin the process of developing, for construction and operation, a landfill gas-to-energy (LFGTE) or landfill gas 	

* Many of the project impacts are reduced by the project’s required compliance with landfill design and operating regulations, city/agency standards and regulations related to construction/development projects and/or by the incorporation of project design measures as noted in this table. Only the proposed project mitigation measures have been numbered to facilitate the distinction between mitigation measures, regulation compliance, and design measures.

Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
	<p>to LNG or CNG plant in the future for use in fueling on- and off-road vehicles, operating equipment or for energy use when: (1) for a LFGTE project, the AVPL generates 1,200 scfm of landfill gas at 50 percent or better methane quality consistently for six months; (2) for LFGTLNG or CNG plant, the AVPL generates 2,500 scfm at 50 percent or better methane quality consistently for six months;</p> <ul style="list-style-type: none"> • Increased diversion of organic material from landfill disposal and use as landfill cover material; • Increased recycling and carbon offsets if available through an adopted program (e.g., the Western Climate Initiative); • The plan shall include cost estimates for GHG reduction measures and identify funding sources. The plan shall include an implementation schedule that demonstrates substantial GHG emission reductions prior to the 2020 deadline, including implementation of “Early action” measures that may be implemented within three years of plan approval. The plan shall include an updated inventory of projected GHG emissions and an updated estimate of GHG emissions in 1990. The plan shall be subject to review and approval by AVAQMD. <p>4.2-7 Following closure of the landfill, the applicant shall continue to operate, maintain, and monitor the landfill gas collection and treatment system as long as the landfill continues to produce landfill gas, or until it is determined by the AVAQMD to ensure that emissions do not</p>	

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
	significantly contribute to additional greenhouse gas emissions.	
<p>Impact 4.2-7 – Cumulative Potential impact to NO_x and PM-10 due to cumulative growth and developments in the surrounding area. The Mojave Air Basin is non-attainment for ozone and PM-10. ROG and NO_x are ozone formation precursor compounds. Any increase in emissions, even at below-threshold levels will retard attainment of applicable standards. Significant and unavoidable.</p>	<p>Mitigation Measures 4.2-1 through 4.2-3, above. No additional mitigation available.</p>	<p>Cumulative</p>
<p>4.3 Hydrology and Water Quality</p>		
<p>Impact 4.3-1 - Post-Development Hydrology/ Flooding Potential for post-development flows during flooding events not meeting the 85% pre-development attenuation criteria of 226 cfs. Less than significant with design measures/ improvements to meet City requirements.</p>	<p>Design improvements included in the Stormwater Management Plan (i.e., two (2) retention/detention basins) and Surface Water Control Plan shall be implemented so that post-development flows will be reduced to less than 85% of the pre-development flows (peak post-development flow estimated to be 160 cfs).</p>	<p>Project Specific</p>
<p>Impact 4.3-2 - Scour/Erosion of Creek Potential for erosion at the north bank of the Anaverde Creek. Less than significant with mitigation.</p>	<p>4.3-1 The final design for the Anaverde Creek Scour Protection System shall be developed by a qualified engineer to comply with the City of Palmdale engineering design requirements. The construction of the approved Scour Protection System shall be completed in conjunction with</p>	<p>Project Specific</p>

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
	Landfill II and the wedge expansion in accordance with the CUP Conditions of Approval.	
<p>Impact 4.3-3 - Runoff and Surface Water Quality Potential contamination of the Anaverde Creek and surface water quality. <i>Less than significant with design measures / improvements (i.e., SMP and SWCP) to ensure regulation compliance.</i></p>	Implementation / construction of the proposed Stormwater Management Plan (SWMP) and Surface Water Control Plan (SWCP) will be developed consistent with all NPDES requirements for the entire site. Potential impacts to surface water quality will be reduced to less than significant levels.	Project Specific
<p>Impact 4.3-4 - Groundwater Quality Potential for groundwater quality impacts. <i>Less than significant with design measures/ improvements to ensure regulation compliance.</i></p>	Implementation of project design measures / components (i.e., Leachate Collection and Removal System, Composite Liner System and Groundwater Monitoring System), developed consistent with Title 27 and NPDES requirements, will reduce the potential groundwater quality impacts to less than significant levels.	Project Specific
<p>Impact 4.3-5 - Cumulative Flooding Potential impact to regional flooding due to cumulative total of developments in the surrounding area. <i>Less than significant with design measures/improvements to meet City requirement.</i></p>	All other cumulative developments must also meet the City's standard requirement that post-development flows cannot exceed 85% of the pre-development flows.	Cumulative
<p>Impact 4.3-6 - Cumulative Water Quality Potential impact to regional water quality (related to runoff, scour) due to the</p>	All other cumulative developments must comply with City ordinances to reduce urban pollutants, NPDES, and BMPs, which include implementing debris/detention basins and oil-water separation filtration systems (where appropriate) for	Cumulative

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
cumulative total of development in the surrounding area. Less than significant with design measures/ improvements to ensure regulation compliance.	stormwater and nuisance flows.	
4.4 Biological Resources		
Impact 4.4-1 – Vegetation and Habitats Removal of existing Joshua and Juniper trees from the proposed expansion zone, 200-foot wide utility corridor, and new frontage road area. Less than significant with mitigation.	4.4-1 Prior to the removal of any Joshua/Juniper trees, the <i>1998 Desert Vegetation Preservation Plan</i> (see Appendix E-2) prepared by FH&A shall be updated and approved by the City of Palmdale consistent with the City's Desert Vegetation Ordinance.	Project Specific
Impact 4.4-2 – Vegetation and Habitats Potential impact related to 1.9 acres of CDFG jurisdictional area if work is performed within jurisdictional areas of Anaverde Creek and potential impact to habitat within Anaverde Creek by future runoff from the landfill. Less than significant with mitigation.	4.4-2 Pursuant to Section 1601 – 1603 of the California Fish and Game Code responsible agencies (i.e., CDFG and Lahontan RWQCB) shall be notified and permits/approvals shall be obtained prior to any activities within, or encroachment upon delineated bed and bank of the Anaverde Creek along the southern margin of the Landfill property. 4.4-3 Prior to issuance of the landfill's Waste Discharge Requirements (WDRs), the project engineer shall finalize erosion and siltation control plans and other BMPs, as necessary to prevent graded and cleared areas from being eroded, resulting in the transport of sediment downstream to Anaverde Creek.	Project Specific
Impact 4.4-3 – Wildlife The removal of the native vegetation from	No mitigation required.	Project Specific

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
<p>the project implementation has potential impacts to wildlife. The new roadway alignment will involve the possible removal of an active coyote den, located immediately adjacent to the realignment connection point with the existing City Ranch Road. Less than significant.</p>	<p>Although no formal mitigation is required, appropriate displacement techniques to avoid harm to the occupants will be implemented prior to grading.</p>	
<p>Impact 4.4-4 – Wildlife Implementation of initial vegetation clearing during the breeding season of native birds could result in loss of nest impacts which would be in violation of the Federal Migratory Bird Treaty Act. Less than significant with mitigation.</p>	<p>4.4-4 Landfill expansion actions which directly affect vegetation formations (i.e., initial vegetation cleaning) shall be initiated outside of the timing of the native bird nesting season (mid-April through mid-August) to avoid disturbing active nests, per provisions of the Migratory Bird Treaty Act and California Fish and Game Code. If initial vegetation disturbance and clearing cannot be performed outside of this window of non-breeding activity, then it shall be preceded by a thorough site/pre-construction surveys in coordination with DFG for active nests by a qualified biologist; nests found shall be flagged, and a perimeter fence installed at an appropriate distance (usually between 50 and 300 feet from the nest, depending upon species and terrain). No work shall be performed within the fenced areas until such time as the nests are determined to be inactive and the fledglings have left the area.</p>	<p>Project Specific</p>
<p>Impact 4.4-5 – Wildlife Potential impact to wildlife due to vegetation loss and potential peripheral effects (light, noise, movement) from the</p>	<p>4.4-5 Facility design and management practices shall be implemented to reduce the intensity of exterior and security lighting adjacent to habitat areas. Measures such as shielded, downward-directed exterior light</p>	<p>Project Specific</p>

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
landfill onto the adjacent habitats. <i>Less than significant with mitigation.</i>	fixtures, use of sodium vapor or similar low-intensity bulbs (other than mercury vapor), shall be utilized. Security and activity lighting shall be directed onto target working face areas, and not into the creek channel.	
Impact 4.4-6 – Wildlife Corridors The proposed project will be aligned within the same upland area as the existing landfill and ancillary facilities and will not measurably reduce the passage of wildlife through that portion of Anaverde Creek corridor. <i>Less than significant with mitigation.</i>	Mitigation Measure 4.4-2 and 4.4-5, above. 4.4-6 The final design of the “off-site” utility pole placement shall be outside of the bed and bank of the channel to permit free passage by the wildlife along the channel.	Project Specific
Impact 4.4-7 – Cumulative The project, in conjunction with other cumulative developments in the area, will result in cumulative losses of natural upland desert formations, native vegetation, and habitat values along Anaverde Creek and in the displacement effects to agency-listed CEQA-sensitive songbird and small mammal species. <i>Less than significant with mitigation.</i>	Mitigation Measures 4.4-1 through 4.4-6, above. No additional mitigation required.	Cumulative
4.5 Noise		
Impact 4.5-1 – Construction Noise Potential for an audible impact to existing residences as a result of landfill ancillary facility construction activities and the realignment of City Ranch Road (R-5	Construction activity for the realignment of City Ranch Road (R-5 access and the new frontage road) shall be limited between the hours of 6:30 a.m. and 8:00 p.m., Monday through Saturday only and excluding legal holidays in compliance with the City’s noise standards within the Municipal Code.	Project Specific

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
<p>access and the new frontage road). Less than significant with mitigation and regulation compliance.</p>	<p>4.5-1 In conjunction with grading permit issuance for construction of new frontage road and the realignment of City Ranch Road (R-5 access) and during grading and construction operations, the following mitigation measures shall be implemented for the project:</p> <ul style="list-style-type: none"> a. All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers, to the satisfaction of the City’s Public Works or Building Inspector. b. During construction of the new landfill access road, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers, to the extent practical, to the satisfaction of the City’s Public Works or Building Inspector. c. During construction of the new landfill access road and to the satisfaction of the City’s Public Works Inspector or Building Inspector, stockpiling and vehicle staging areas shall be located as far as practical from noise sensitive receptors during construction activities. 	
<p>Impact 4.5-2 - On-Road Hauling Noise Potential for significant off-site traffic noise impacts related to increased hauling trucks. Less than significant.</p>	<p>No mitigation required.</p>	<p>Project Specific</p>
<p>Impact 4.5-3 - Operational Noise</p>	<p>The proposed project would not exceed the City of Palmdale</p>	<p>Project Specific</p>

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
<p>Potential for operation noise impacts to existing and future residences as a result of the expanded landfill hours for receipt of refuse and the on-site heavy equipment used in earthmoving activities and the compaction processes. Less than significant with mitigation and regulation compliance.</p>	<p>Noise Element or Municipal Code for anticipated site uses. However, because single-event operational noise may be intrusive even if standards are not exceeded, noise protection is recommended as follow.</p> <p>4.5-2 Operational activities before 6:00 a.m. or after 8:00 p.m. shall be restricted as follows:</p> <ul style="list-style-type: none"> a. No receipt of refuse or unloading activities shall be conducted during those hours. b. No heavy equipment operation within 1,000 feet of any residence under clear line-of-sight conditions shall take place during those hours. c. No bird repellent activity sound generators shall occur before 7:00 a.m. or after 8:00 p.m. 	
<p>Impact 4.5-4 – Cumulative On-Road Hauling Noise Potential for cumulative noise impacts as a result of expanded landfill truck traffic and future cumulative growth in year 2007. Less than significant.</p>	<p>No mitigation required.</p>	<p>Cumulative</p>
<p>Impact 4.5-5 – Cumulative Construction Noise Potential for cumulative noise impacts as a result of the construction activities for the landfill ancillary facilities and the</p>	<p>Construction of the project ancillary facilities and other cumulative developments shall be limited between the hours of 6:30 a.m. and 8:00 p.m., Monday through Saturday only and excluding legal holidays in compliance with the City’s noise standards within the Municipal Code.</p>	<p>Cumulative</p>

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
realignment of City Ranch Road (R-5 access and the new frontage road) in conjunction with the landfill expansion operational activities and construction of projects in the surrounding area. Less than significant with mitigation and regulation compliance.	Mitigation measures 4.5-1 and 4.5-2, above. No additional mitigation measure required.	
4.6 Aesthetics / Light and Glare		
Impact 4.6-1 – Scenic Resources/Visual Qualities Potential impacts to scenic resources related to the proposed 11-acre wedge expansion/reconfiguration, 60-foot height increase and new landfill access roadway. Less than significant with mitigation.	4.6-1 Interim vegetative cover shall be established as land filling proceeds to help offset visual impacts prior to application of final cover and vegetation at landfill closure. This interim measure provides that the outer southerly facing slopes shall receive cover material consistent with native species of the surrounding terrain as the phased development continues with application at appropriate intervals but at a minimum of every two to four year. Interim vegetation plant densities/seed mix shall be completed consistent with the baseline study to be conducted prior to the beginning of land filling operations in the expansion area. 4.6-2 Final design of the access roadway shall comply with Policy ER 3.1.2, to the extent feasible, to reduce the visual impact to the existing ridgeline as viewed from Tierra Subida and Rayburn Road.	Project Specific
Impact 4.6-2 - Litter Potential for significant aesthetic impacts related to litter. Less than significant with mitigation.	4.6-3 During conditions of severe wind, operating hours shall be limited, size of the working face shall be reduced, and completed cells shall be promptly covered.	Project Specific

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
	4.6-4 During landfill operations and after construction activity, personnel shall conduct periodic litter cleanup along, 1) the access roadway(R-5 access) and adjacent land from the scales to Tierra Subida Avenue and 2) properties adjacent to the landfill. The goal is to ensure that stray litter (including litter that is illegally dumped along the landfill access road) is immediately removed when strong winds occur.	
Impact 4.6-3 – Light and Glare Potential increase in light and glare associated with the new ancillary uses. Potential cumulative light and glare impacts in conjunction with other cumulative developments in the area. Less than significant with mitigation.	Mitigation Measure 4.4-5 in Section 4.4 (Biological Resources), above. No additional mitigation measure is required.	Project-Specific Cumulative
Impact 4.6-4 Cumulative Potential cumulative aesthetic impacts, in conjunction with existing Landfill I, permitted Landfill II, and other cumulative developments in the area. Significant and unavoidable.	Mitigation Measures 4.6-1 through 4.6-3, above. No additional mitigation measure is available.	Cumulative
4.7 Traffic and Circulation		
Impact 4.7-1 - Existing Plus Project Volume to Capacity (V/C) Ratios/Roadway Links Potential impact to level of service (LOS) on roadway links in the vicinity of the site. Less than significant.	No mitigation required.	Project Specific

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
<p>Impact 4.7-2 - Existing Plus Project Intersection Capacity Utilization (ICU)/Levels of Service (LOS) Potential impact to LOS at intersections in the vicinity of the site. <i>Less than significant.</i></p>	<p>No mitigation required.</p>	<p>Project Specific</p>
<p>Impact 4.7-3 – Sight Distance Potential for restricted sight distance for southbound vehicles on Tierra Subida Avenue approaching City Ranch Road. <i>Less than significant with mitigation.</i></p>	<p>4.7-1 The City of Palmdale shall approve the final roadway design for the new landfill access and periodically review traffic operations in the vicinity of the project once the project is constructed to assure that the traffic operations are satisfactory.</p> <p>The future landfill access road alignment shall be along R-5 as a two lane roadway (60-foot right-of-way). R-5 shall intersect a new frontage road.</p> <p>The R-5 access road shall be constructed as a two lane roadway (60-foot right-of-way).</p> <p>The future landfill access road alignment shall also be along the new frontage road that would connect with City Ranch Road and intersect Tierra Subida at Rayburn Road, and create a 4-way signalized intersection, and construction the remaining access road along the R-5 dedicated right-of-way (Figure 4.7-13, Proposed Realignment of City Ranch Road to be Opposite Rayburn Road at Tierra Subida Avenue and 4.7-14, Proposed City Ranch Road Roadway Cross-Section).</p>	<p>Project Specific</p>

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
	<p>Preliminary design of the frontage road calls for a 40-foot roadway measured from curb to curb, with an 8-foot sidewalk adjacent to the west curb and a 10-foot-minimum buffer between the east curb and the ultimate location of the west sidewalk of Tierra Subida proper. The new realignment of the landfill access (new frontage road) shall accomplish the following:</p> <ul style="list-style-type: none"> ▪ Improve sight distance and related operational safety. ▪ Improve horizontal and vertical alignment. ▪ Wider lanes will result at the Tierra Subida Avenue/Rayburn Road intersection than at the existing City Ranch Road intersection. ▪ Improve traffic signal spacing along Tierra Subida Avenue. <p>4.7-2 The applicant shall construct right-of-way and traffic signal improvements at the intersection of the landfill access road at Rayburn Road (see Figure 4.7-13) in conjunction with Landfill II and the wedge expansion in accordance with the CUP Conditions of Approval.</p> <p>4.7-3 During landfill operations, worker-rideshare and transit plans shall be encouraged by the landfill operator consistent with the goals of the Air Quality Management Plan.</p> <p>4.7-4 The applicant shall pay traffic impact fees in accordance with the City Traffic Impact Fee Ordinance. Credits shall be applied consistent with the Ordinance for the improvements (see Mitigation Measure 4.7-2) installed</p>	

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
	by the applicant.	
<p>Impact 4.7-4 – State Route 14 Freeway Potential impact to SR-14 from project and cumulative growth, south of Avenue S. <i>Less than significant.</i></p>	No mitigation required.	Project Specific
<p>Impact 4.7-5 – Cumulative Year 2007 Volumes to Capacity Ratios Potential impact to LOS for Tierra Subida Avenue between 5th Street West and Rayburn Road for Year 2007 without project and with project traffic conditions. <i>Project’s contribution to cumulative impact is less than significant with mitigation. Cumulative impact remains significant and unavoidable.</i></p>	Mitigation Measures 4.7-1 through 4.7-4, above. This significant cumulative impact will remain until such time that Tierra Subida is widened to its ultimate General Plan designation.	Cumulative
<p>Impact 4.7-6 – Cumulative Year 2007 Intersection Capacity Utilization (ICU) Potential cumulative impact to LOS for intersections in the vicinity of the site during peak hours for the Year 2007 without project traffic conditions. Potential cumulative impact to LOS for intersections for the Year 2007 with project traffic conditions, during the peak hours for average and peak inflow of material traffic conditions.</p>	No mitigation required.	Cumulative

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
<i>Less than significant.</i>		
4.8 Risk of Upset and Human Health		
<p>Impact 4.8-1 Household Hazardous Waste Potential impact related to household hazardous waste and radioactive waste. <i>Less than significant with mitigation.</i></p>	<p>4.8-1 The permittee shall maintain a comprehensive waste load checking program, which shall include the following:</p> <ul style="list-style-type: none"> a. All waste hauling vehicles shall be screened at the scales with a radiation detector device acceptable to the Local Enforcement Agency for the presence of radioactive materials. b. Sensors capable of detecting volatile organic compounds, acceptable to the Local Enforcement Agency shall be available and used as directed by the Local Enforcement Agency. c. A remote television monitor or an alternative procedure acceptable to the Local Enforcement Agency shall be maintained at the scales to visually inspect incoming roll-off type loads and open top vehicles. d. The dumping area shall be continuously inspected for hazardous and liquid waste and radioactive waste/materials. This inspection shall be accomplished by equipment operators and spotters who have been trained in an inspection program approved by the Local Enforcement Agency (LEA). The landfill currently complies with the LEA inspection procedures and will continue to comply as required by their SWFP. e. Manual inspection of randomly selected refuse loads 	<p>Project Specific</p>

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Impact	Mitigation Measures/Regulation Compliance/Design Measures *	Scope
	<p>shall be conducted. The frequency of inspections shall be as directed by the Local Enforcement Agency. The checking program shall be conducted by personnel trained in accordance with a plan approved by the Local Enforcement Agency.</p> <p>Additionally, as part of the proposed project, the entrance to the facility is equipped with monitors to detect radioactive waste.</p>	
<p>Impact 4.8-2 Cumulative Potential cumulative impact related to increased household waste. <i>Less than significant with mitigation.</i></p>	<p>Mitigation Measure 4.8-1, above. No additional mitigation measure required.</p>	<p>Cumulative</p>

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1.5 ADDITIONAL ENERGY INFORMATION

1.5.1 INTRODUCTION

CEQA requires lead agencies to consider the potential energy impacts of proposed projects in their environmental impact reports (EIRs), with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary energy consumption. (See Appendix F (Energy Conservation); see also Pub. Resources Code, § 21100(b)(3) (mitigation measures required for significant adverse impacts of a project to consider ability to reduce wasteful, inefficient, and unnecessary consumption of energy).) Amendments to the CEQA Guidelines, effective March 18, 2010, made it clear that any “[p]otentially significant energy implications of a project **shall** be considered in an EIR **to the extent relevant and applicable to the project**. (Appendix F (II).) As part of this mandate, lead agencies may also consider the extent to which an energy source serving the project has already undergone environmental review that adequately analyzed and mitigated the effects of energy production. (Appendix F (I).)

The potential for significant energy impacts from the proposed project was considered in the Initial Study originally prepared for the project. (See IS, pp. 42-43 contained in Appendix A-1 of the Draft EIR.) The Initial Study, using a CEQA/Environmental Checklist and Appendix F of the CEQA Guidelines, current at the time the Initial Study was prepared, considered whether the project would result in: (1) the use of substantial amounts of fuel or energy? Or (2) a substantial increase in demands upon existing sources of energy, or require the development of new sources of energy? (IS, pp. 42-43 contained in Appendix A-1 of the Draft EIR.) Reaching “no impact” conclusions, the Initial Study explained that although the refuse footprint would be increased by 11 acres under the project, the daily intake of refuse would not increase over permitted levels within the existing County CUP. Thus, energy demands to transport refuse would not be increased over what was already approved. The Initial Study also recognized the benefits of the on-site LNG fueling station as well as WM’s efforts to convert its hauling fleet to LNG or CNG. For these reasons, the Initial Study concluded that the proposed project would not have a significant impact on the environment from additional energy consumption and that no additional analysis was required in the EIR.

In response to comments received on the revised and recirculated “Amendment” to the DEIR, the Final EIR includes additional information on energy. (See Section 3.0, Responses to Comments, specifically responses 12-16 and 12-17.) In addition, the following background and additional information is included in the EIR for the decisionmakers consideration.

1.5.2 ADDITIONAL ENERGY BACKGROUND/REGULATORY FRAMEWORK

Federal

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. In addition to setting increased Corporate Average Fuel Economy (CAFE) standards for motor vehicles, the EISA includes other provisions related to energy efficiency:

- Renewable Fuel Standard (RFS) (Section 202).
- Appliance and Lighting Efficiency Standards (Sections 301–325).
- Building Energy Efficiency (Sections 411–441).

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs”.

State

Title 24 Energy Efficiency Standards

California’s Energy Efficiency Standards for Residential and Non-residential Buildings were established in 1978 in response to a mandate to reduce the State’s energy consumption. These standards are promulgated under CCR, Title 24, Part 6, and are commonly referred to as “Title 24”. The Title 24 standards are periodically updated to reflect new or improved energy efficiency technologies and methods. The 2008 Title 24 standards have been adopted and apply to any project requesting a building permit on or after August 1, 2009. A new development project is required to incorporate the most recent Title 24 standards in effect at the time the building permit application is submitted.¹

1.5.3 EXISTING CONDITIONS

According to the U.S. Department of Energy, in 2007, California’s total energy consumption—including for electricity generation—was 8,491.5 trillion British thermal units (Btu), representing approximately 8 percent of the United State’s energy consumption (USDOE 2007). The major sources of consumed energy were petroleum (46.5 percent) and natural gas (28.7 percent). Other sources include coal, nuclear electric power, hydroelectric power, geothermal power, and biomass. Approximately 18 percent of this energy was consumed by residential users, 19

¹ Please also refer to Section 3.0, Response to Comments, specifically responses 2-16 and 2-17, re: Greenhouse Gas Emissions.

percent by commercial users, 23 percent by industrial users, and 40 percent by the transportation sector. In 2008, the California Energy Commission (CEC) found that California's major sources of electricity were natural gas (46.5 percent), nuclear (14.9 percent), large hydroelectric (9.6 percent), coal (15.5 percent), and renewable sources (13.5 percent) (CEC 2009). Approximately 73.2 percent of California's electricity is generated in state; approximately 8.4 percent comes from the Pacific Northwest; and approximately 18.4 percent comes from the Southwest (CEC 2009).

As noted above, natural gas represents the largest source of electricity in California, and is the second-largest type of consumed fuel. Petroleum is the most-consumed source of energy in the state, and the transportation sector consumes approximately 40 percent of the State's energy. The State's natural gas comes from a variety of places. In 2007, approximately 12.9 percent came from California, 22.1 percent came from Canada, 24.2 percent came from the Rocky Mountains, and 40.8 percent came from the Southwest (CEC 2009). Similarly, the crude oil consumed in California comes from both in-state and out-of-state sources. In 2007, approximately 38.12 percent came from California, 13.41 percent came from Alaska, and 48.46 percent came from foreign countries (CEC 2009).

Electricity

Electrical service to the AVPL is provided through Southern California Edison (SCE). SCE is an independently owned utility that provides electrical power to a business and residential population of approximately 13 million people within a 50,000-square-mile service area that covers Central, Coastal, and Southern California, including the City of Palmdale and the AVPL. SCE distributes electricity purchased through the California Power Exchange. SCE is regulated by the California Public Utilities Commission (CPUC), which protects customers from overcharge and promotes energy efficiency, system reliability, and financial integrity of utilities. According to the CEC, the SCE service area experienced a peak demand of 19,408 megawatts (MW) in 2000 (CEC 2009). The CEC estimates that electricity consumption and peak demand within SCE's service territory will continue to grow annually from 2010 to 2018 by 1.26 percent and 1.40 percent, respectively. In 2006, the CEC projected a peak demand in SCE's service territory of 24,960 megawatts (MW) in 2012 and a net energy load of 125.2 million megawatt hours (MWH). In 2009, the CEC projected a peak energy demand of 24,543 MW in 2015 and a peak energy demand of 25,561 MW in 2018.

SCE derives its electricity from a variety of sources, as shown in Table 1-2. Nearly half of its electricity comes from natural gas, with renewable resources constituting another nearly 20 percent.

**TABLE 1-2
SOUTHERN CALIFORNIA EDISON POWER CONTENT**

Energy Resources	2009 SCE Power Mix^a (Projected)
Eligible Renewable	16%
Biomass & Waste	2%
Geothermal	9%
Small Hydroelectric	1%
Solar	1%
Wind	3%
Coal	10%
Large Hydroelectric	5%
Natural Gas	51%
Nuclear	18%
Other	<1%
Total	100%
^a 98 percent of SCE System Power Mix is specifically purchased from individual suppliers. Source: SCE.	

Standard electricity generation rates used by SCE currently exist under tariff schedules General Service (GS-2) and Time-of-Use (TOU), as filed with the CPUC. The primary distribution voltage levels serving the City are 12,000 kilovolts (kV) for commercial and residential uses, 6,900 for residential tract housing, and 4,000 kV for rural residential uses.

SCE currently has overhead and underground facilities at various locations that are capable of providing ongoing service to the Project and existing buildings.

Propane Gas

Four existing propane tanks provide gas service to the AVPL. One tank is used solely for backup of the maintenance building’s fire suppression system. The other tanks provide service to existing buildings at the AVPL. The existing tanks, which are served by a third party contractor, are adequate to provide continued service to the site under the proposed project, which would not result in an increase in buildings requiring additional gas service. The AVPL does not, and will not, have any effect on natural gas supplies.

1.5.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines, Environmental Checklist Form, serves as a guideline of consequences that are deemed to have a significant effect on the environment. According to the Environmental Checklist, a project may be deemed to have a significant energy effect if it will:

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered energy transmission facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable levels of service.
- b. Conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

1.5.5 PROJECT IMPACTS

Impact Summary A: No Impact/ Less Than Significant Impact. There are existing electrical and propane gas facilities within and adjacent to the Project site to continue serving the Site. SCE has the ability to continue serving the AVPL without adversely affecting their ability to continue serving the Project area. There would be no impact from additional demand for electric or gas services or infrastructure with implementation of the Project or Reduced Alternative as no new buildings requiring heating or air are proposed.

Impact Summary B: Less Than Significant. The proposed Project includes an 11 acre expansion of an existing MSW landfill and will not cause a conflict with any applicable plan goals or policies. The 11 acre expansion will provide for an increase in overall landfill capacity. The AVPL is recognized as a long-term waste disposal facility by existing County and City plans, ordinances and General Plan policies. Therefore, the extended landfill operation will not cause conflict with applicable plans, goals, or policies.

According to Appendix F (Energy Conservation) of the CEQA Guidelines, moreover, Environmental Impacts may also include, in part:

2. *The effects of the project on local and regional energy supplies and on requirements for additional capacity.*

As noted above, the proposed project would not require additional electrical or gas supplies and, as explained elsewhere in the EIR, would not cause the need for additional MSW disposal because such waste is already being generated with or without the proposed project.

Under the recommended Reduced Project Alternative, moreover, there would be no daily increase in vehicles or waste tonnages over previously approved levels; thus, there is no need for new diesel equipment, vehicles, or the installation of new structures requiring new energy sources. As such, the project will not affect the energy supplies already existing at the site, create a need for substantial additional capacity, or otherwise create an additional burden on local or regional energy supplies

3. *The effects of the project on peak and base period demands for electricity and other forms of energy.*

For the same reasons explained above, neither the proposed project nor the Reduced Project Alternative would affect peak or base period demands.

6. *The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.*

By providing the ability to continue disposal of MSW at AVPL, and providing for the logical expansion of the existing landfill to include the 11 acres at issue (thereby increasing the efficiency of construction and closure by eliminating the existing leap frog nature of Landfill I and Landfill II), adoption of the project, or Reduced Project Alternative, would ensure the efficient use of energy, including transportation fuels, from those activities which are already occurring.

1.5.6 MITIGATION MEASURES

As noted above, there would be no impact/less than significant impacts from additional demand for electric or gas services or infrastructure with implementation of the Project or Reduced Alternative. In addition, the proposed Project would not cause a conflict with any applicable plan goals or policies. Therefore, no mitigation measures would need to be incorporated into the project.

1.5.7 CONCLUSION

Under the recommended environmentally superior Reduced Project Alternative (11-acre expansion with no increase in daily permitted tonnage), moreover, the project would not create any inefficient, wasteful, or unnecessary consumption of energy. This is in part because there will be no increase in the existing permitted levels of operation (e.g., daily tonnage rate) for disposal. It is also because the MSW disposed of at the AVPL must be disposed of somewhere. If not the AVPL it must be hauled to another site. The proposed project, by nature, does not

cause the need for additional MSW to be disposed of. Thus, energy consumption on a daily, weekly, monthly, or annual basis will not change over previously approved and existing levels for AVPL or for purposes of disposal elsewhere. No impact in the form of wasteful, inefficient or unnecessary consumption of energy would occur from approval of the proposed project or the Reduced Project Alternative.

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2.0 DECEMBER 2005 DRAFT EIR COMMENT LETTERS AND RESPONSES

2.1 WRITTEN COMMENTS/RESPONSES

2.1.1 INTRODUCTION

This section provides responses to the written comments made on the Antelope Valley Public Landfill (AVPL) Draft EIR during the OPR published public review period of December 14, 2005 to January 27, 2006. The comment letters received on the December 2005 Draft EIR are numbered, as listed below, and are included in this section along with the formal responses prepared for the comments. To assist in referencing comments and responses, each specific comment is numbered and refers to a statement or paragraph in the corresponding letter. Where changes to the Draft EIR text result from response to comments, those changes are included in the response and demarcated with revision marks (underline for new text, strike-out for deleted text). Comments which present opinions about the project or which raise issues not directly related to the substance of the Draft EIR are noted without a detailed response. Comment-initiated revisions/clarifications to the EIR text are also provided and are demarcated with revision marks in Section 3.0, Changes to the Draft EIR of this document.

2.1.2 LIST OF COMMENTERS

The comment letters received on the December 2005 Draft EIR are listed below (ten letters total). The paragraphs in the letters have been numbered and are referred to in the responses that directly follow the comment letter.

Letter	Agency/Signatory	Date
#1	Southern California Association of Governments, Brian Wallace	January 9, 2006
#2	County of Los Angeles, Department of Public Works, Donald Wolfe	January 11, 2006
#3	State of California, Health and Human Services Agency, Department of Health Services, Joseph E. Crisologo	January 11, 2006
#4	California Integrated Waste Management Board, Raymond M. Seamans	January 12, 2006
#5	Steve Schirmbeck, Local Citizen	January 14, 2006
#6	State of California, Public Utilities Commission	January 24, 2006
#7	State of California, Business, Transportation and Housing Agency, Department of Transportation, District 7, Cheryl J. Powell	January 24, 2006
#8	County of Los Angeles, Department of Public	

	Works, Donald L. Wolfe	January 26, 2006
#9	California Regional Water Quality Control Board, Lahontan Region	January 27, 2006
#10	State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	January 30, 2006

The letter comments and responses follow.

Letter No. 1



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1-1

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Riverside County: Jeff Stone, Riverside County • Thomas Buckley, Lake Elsinore • Bonnie Flickinger, Moreno Valley • Ron Loveridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

San Bernardino County: Gary Ovitt, San Bernardino County • Lawrence Dale, Barstow • Paul Eaton, Montclair • Lee Ann Garcia, Grand Terrace • Tim Jasper, Town of Apple Valley • Larry McCallon, Highland • Deborah Robertson, Rialto • Alan Wagner, Ontario

Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

Orange County Transportation Authority: Lou Correa, County of Orange

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Keith Millhouse, Moorpark

January 9, 2006

Mr. Richard Kite, Senior Planner
City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550

RE: SCAG Clearinghouse No. I 20050821 Antelope Valley Public Landfill Conditional Use Permit

Dear Mr. Kite:

Thank you for submitting the **Antelope Valley Public Landfill Conditional Use Permit** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Antelope Valley Public Landfill Conditional Use Permit**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **December 1-15, 2005 Intergovernmental Review Clearinghouse Report** for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1851. Thank you.

Sincerely,

BRIAN WALLACE
Associate Regional Planner
Intergovernmental Review



Response to Letter No. 1
Southern California Association of Governments – January 9, 2006

Response 1-1

The comment is acknowledged but does not raise any environmental issues; therefore, no response is required.

Letter No. 2



DONALD L. WOLFE, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

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IN REPLY PLEASE
REFER TO FILE **W-0**

January 11, 2006

Mr. Richard Kite
City of Palmdale Planning Department
38250 North Sierra Highway
Palmdale, CA 93550

Dear Mr. Kite:

**LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40, ANTELOPE VALLEY
DRAFT ENVIRONMENTAL IMPACT REPORT
ANTELOPE VALLEY PUBLIC LANDFILL CONDITIONAL USE PERMIT**

2-1

Thank you for the opportunity to review the subject document. We have no comments at this time. The project site is located in the service area of Los Angeles County Waterworks District No. 40, Antelope Valley.

If you have any questions, please contact Mr. Hubert Seto at (626) 300-3349.

Very truly yours,

DONALD L. WOLFE
Director of Public Works

MANUEL DEL REAL
Assistant Deputy Director
Waterworks and Sewer Maintenance Division

HS:pr
GE173

Response to Letter No. 2
County of Los Angeles, Department of Public Works – January 11, 2006

Response 2-1

The comment is acknowledged but does not raise any environmental issues; therefore, no response is required.

Letter No. 3



State of California—Health and Human Services Agency
Department of Health Services



ARNOLD SCHWARZENEGGER
Governor

January 11, 2006

Mr. Richard Kite, Senior Planner
Planning Department
City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550

Dear Mr. Kite:

SCH# 1990010988: DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE ANTELOPE VALLEY LANDFILL EXPANSION

Thank you for the opportunity to review and comment on the subject document. The California Department of Health Services, Drinking Water Field Operations-Southern California Branch (Department) focused its review on drinking water issues and related issues. Following are the comments:

1. First paragraph of page 1-6 and Figure 1-5 indicates proposed construction of ancillary facilities and existing facilities, respectively, including potable water tanks. Although page 1-6 does not specifically state water facilities as part of the proposed construction, it could be inferred that said water facilities are not specifically excluded either. If new water facilities (e.g., piping and water storage tanks) are contemplated to be built, such facilities must comply with the Department's *Criteria for the Separation of Water Mains and Non-Potable Pipelines (Criteria)*.

3-1

If construction of water facilities and development in areas described in the draft EIR will be undertaken, notifications and requests for the necessary reviews and approval should be sent to the Los County Department Health Services' Cross-Connections & Water Pollution Control Program to ensure compliance with the cross-connection requirements, inspections, and the separation criteria.

It is indicated in the Initial Study (IS) in Appendix A of the Technical Appendices (Volume I), page 22, that there may be future developments such as the Anaverde LLC and Ritter Ranch. Impacts on these future developments from the landfill expansion project should be evaluated. The *Criteria* mentioned above also apply to the future developments with respect to the landfill expansion project.



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Southern California Drinking Water Field Operations Branch, Los Angeles Region
1449 West Temple St., Room 202, Los Angeles, CA 90026
Telephone: (213)580-5723 Fax: (213)580-5711
Internet Address: www.dhs.ca.gov/ps/ddwem/

**Letter No. 3,
 Continued**

Mr. Richard Kite, Senior Planner
 Page 2
 January 11, 2006

3-2

2. The IS, page 20, indicates that the proposed project is located downstream from the aqueduct and therefore, no adverse impact to the aqueduct would result. Prior environmental analysis identified potential impact could occur if the California Aqueduct should fail. In the event of such failure, although the landfill would not be impacted, the portion of the site (non-landfill property) adjacent to the Anaverde Creek may experience some soil erosion. The proposed project would not change the boundaries of the landfill expansion site in a manner that would be affected by the failure of the California Aqueduct; therefore, no impacts are anticipated.

The IS also stated that while the topographic elevation of the project is higher than the topographic elevation of Lake Palmdale, the project area is not located in the Lake Palmdale watershed; therefore, no runoff impact would occur to the Lake. Additionally, the project area is not located in an inundation area below Lake Palmdale dams or Littlerock Dam; therefore, no impacts are anticipated.

However, the answers to the following questions (on pages 22 and 23): (h) Will any aspect of the project results in discharge of material into surface waters, or in any alteration of surface water quality, including but not limited to, temperature, dissolved oxygen, or turbidity?; and (i) Will the project result in the significant alteration of the direction or rate of flow of groundwater?, are potentially significant unless mitigation incorporated and less than significant impact, respectively. The mitigation measures offered by the IS as identified in the previously approved EIR (a second EIR???) pertaining to flooding, increased runoff, ground and surface water flows, and quality will be reviewed by the project engineers and updated; and new mitigation measures will be incorporated, as appropriate, to reduce the potential adverse impacts to a level of less than significant.

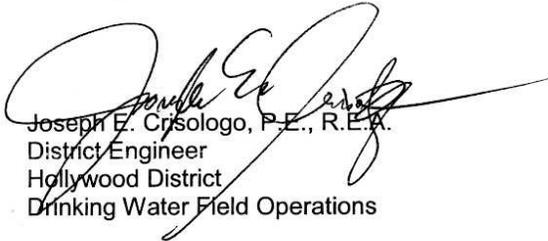
Comment: The review and update, if warranted, of mitigation measures by the project engineers should include "All Potential Contaminating Activities" (PCAs) that may impact domestic production wells, if any, and any other potential sources of water supply (e.g., surface water bodies such as maybe the Anaverde Creek and others) within or nearby the subject area as described in the draft EIR.

**Letter No. 3,
Continued**

Mr. Richard Kite, Senior Planner
Page 3
January 11, 2006

If you have any questions, please contact Mr. Ric M. Roda, P.E., at (213) 580-3124 or me at (213) 580-5743.

Sincerely,



Joseph E. Crisologo, P.E., R.E.A.
District Engineer
Hollywood District
Drinking Water Field Operations

cc: Mr. Carlos Borja, Acting Program Director
Los Angeles County Department of Health Services
Cross-Connections & Water Pollution Control Program
5050 Commerce Drive, RM 116
Baldwin Park, CA 91706-1423

SDWSRF-Environmental Coordinator
Drinking Water Program
Technical Program Branch
1616 Capitol Avenue, MS 7416, P.O. Box 997413
Sacramento, CA 95899-7413

Mr. Scott Morgan
State Clearinghouse
P. O. Box 3044
Sacramento, CA 95812-3044

Response to Letter No. 3
State of California, Health and Human Services Agency,
Department of Health Services – January 11, 2006

Response 3-1

The comment regarding compliance with Department's Criteria for the separation of water mains and non-portable pipelines is acknowledged. The project does not propose construction of a potable water tank. Additionally, as indicated in Section 3.0, Project Description, of the Draft EIR, no potable water facilities are proposed as part of the CUP for this landfill consolidation project.

The comment regarding future developments (referred to on page 22 of the Initial Study), such as the Anaverde LLC and Ritter Ranch is acknowledged and has been addressed in the Draft EIR. Consistent with CEQA Guidelines Section 15130, the Draft EIR includes a description of cumulative projects and the scope utilized to analyze the potential impacts from and upon these projects is included within Section 3.5, Related Projects/Cumulative Approach Assumptions. Additionally, the impact of the proposed project on cumulative projects such as the Anaverde and Ritter Ranch is assessed in different sections of the Draft EIR, such as Noise (Section 4.5), Aesthetics (Section 4.6), and other sections, as appropriate.

Response 3-2

The comment quotes pages 20, 22, and 23 of the Initial Study document that was prepared to focus the scope of the Draft EIR, which went into circulation on December 14, 2005 through January 27, 2006. The Draft EIR includes detailed information in the Earth Resources (Section 4.1) and Hydrology and Water Quality (Section 4.3) including the review and update of mitigation measures from the previous 1992 certified EIR which was prepared for the approval of Landfill. Please refer to Sections 4.1 and 4.3 of the Draft EIR.

Additionally, no "Potential Contaminating Activities" (PCAs) are proposed as part of the project that would impact domestic production wells or any other potential sources of water supply (e.g., surface water bodies such as maybe the Anaverde Creek.) Pages 4.3-12 through 4.3-17 along with Appendix D of the Draft EIR provide a detailed analysis of potential project impacts on surface water quality. This analysis concludes that the Anaverde Creek is an intermittent stream which flows only during peak flooding events. No evidence of surface water was observed in the reach of the creek south of the Landfill between November 2003 and May 2004. Although no surface water have been observed recently, a "Stormwater Management Plan" (SWMP) has been proposed to prevent contamination of the Anaverde Creek and surface waters. With implementation of the SWMP (see Figures 3-6, Stormwater Management Plan and 4.3-4, Post-Development Surface Water Control Plan and actions listed on page 4.3-14 to 4.3-15 of the Draft EIR), no impacts to surface water quality are anticipated.

Letter No. 4



Alan C. Lloyd, Ph.D.
Secretary for
Environmental
Protection

California Integrated Waste Management Board

Rosario Marin, Chair
1001 I Street • Sacramento, California 95814 • (916) 341-6000
Mailing Address: P. O. Box 4025, Sacramento, CA 95812-4025
www.ciwmb.ca.gov



Arnold Schwarzenegger
Governor

January 12, 2006

Mr. Richard Kite, Senior Planner
City of Palmdale Planning Department
38250 Sierra Highway
Palmdale, CA 93550

Subject: SCH No. 1990010988 – Draft Environmental Impact Report for the proposed expansion to the Antelope Valley Landfills I and II, Solid Waste Facilities Permits Nos. 19-AA-0009 and 19-AA-5624, City of Palmdale, Los Angeles County

Dear Mr. Kite:

Thank you for allowing the California Integrated Waste Management Board (Board) Environmental Review staff to provide comments for this proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

The environmental document has been reviewed and Board staff offer the following project description, analysis and our recommendations for the proposed project based on our understanding of the project. If the project description outlined below varies substantially from the project as understood by the Lead Agency, the Environmental Review staff requests incorporation of any significant differences in the Final Environmental Impact Report.

PROJECT DESCRIPTION

The City of Palmdale, acting as Lead Agency, has prepared and circulated a Draft Environmental Impact Report to prospective Responsible Agencies in order to help identify and evaluate potential environmental impacts and/or other Responsible Agency concerns that could occur with the approval of the proposed project. The proposed project will require revision of the existing Solid Waste Facilities Permit (SWFP) and may require other federal, state or local approvals.

The Lead Agency is proposing the consolidation of Antelope Valley Public Landfill I and Antelope Valley Public Landfill II in to a single landfill, including the 11 acres between the two landfills. The new landfill will be a total of 185 acres with a disposal footprint of 125 acres.

California Environmental Protection Agency

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**Letter No. 4,
Continued**

DEIR Antelope Valley Public Landfill

January 12, 2006

The peak tonnages will increase, hours of operation will not change, peak elevation will decrease, several ancillary operations will be constructed, Southern California Edison's electric transmissions lines will be relocated and a liner, leachate collection system, ground water monitoring and gas collection system will be installed.

**Current Entitlements
For Antelope Valley Public Landfill I & II
and
Proposed Entitlements
For the Combined Antelope Valley Public Landfill**

	Landfill I Current	Landfill II Current	Combined Landfill As Proposed
Permitted Area	65 Acres	75 Acres	185 Acres
Permitted Disposal Area	57 Acres	54 Acres	125 Acres
Remaining Capacity	4.6 MM yd ³	8.2 MM yd ³	24 MM yd ³
Maximum Elevation	3205 ft MSL	3140 ft MSL	3200 ft MSL
Maximum Depth Below Ground Surface	NA	NA	None Specified
Estimated Closure Date	July 1999	2008	2022
Peak Daily Tonnage	1400	1800	5548 tons per day
Solid Waste			3600 tons per day
TPH** Contaminated Regulated Soil			15%* of the daily intake of solid waste***
Recyclables & ADC			1948 tons per day
Peak Daily Vehicle (567 trucks 230 cars)	434	550	797
Landfill & Ancillary Operations	5:00 AM to 10:00 PM	5:00 AM to 10:00 PM	No Change
Days of Operation	Monday thru Sunday	Monday thru Sunday	No Change
Receipt of Waste	6:00 AM to 5:00 PM	6:00 AM to 5:00 PM	6:00 AM to 8:00 PM
Open to Public	8:00 AM to 4:45 PM	None Specified	6:00 AM to 8:00 PM

* - The environmental document indicates 150% of the daily intake (with a strike-through on the zero) – in discussion with the Lead Agency, January 3, 2006, it was determined that that was an error and the percent was to be 15 (fifteen).

** - Total Petroleum Hydrocarbons

*** - Based on 3600 tons per day

There are 10 areas of significant impact to health, safety and the environment, through mitigation measures, 7 will be reduced to a level of less than significant.

**Letter No. 4,
Continued**

DEIR Antelope Valley Public Landfill

January 12, 2006

Mitigated to a level of less than significant

- Archaeological Resources
- Biological Resources
- Earth Resources (Geology/Soils)
- Hydrology and Water Quality
- Noise
- Paleontological Resources
- Risk of Upset and Human Health

Not mitigated to a level of less than significant (**Significant Cumulative Impacts**)

- Aesthetics/Light and Glare
- Air Quality
- Traffic and Circulation

BOARD STAFF'S COMMENTS

For clarity and convenience, questions and comments that Board staff is seeking specific responses to will be *italicized* so the reader can more easily locate and respond to them. Board staff will also make statements that in their opinion are fact, if those statements are incorrect or unclear please notify Board staff immediately. By an environmental document not specifically prohibiting an action or activity that does not give tacit approval to perform that action or activity.

Statement of Overriding Considerations

4-1

A Statement of Overriding Consideration will be necessary for Aesthetics/Light and Glare, Air Quality and Traffic and Circulation. Prior to certification of the Environmental Impact Report, please forward a copy of the Statements of Overriding Considerations to Board staff for our review.

Hours and Days of Operation

4-2

The hours of operations will be from 5:00 am through 10:00 pm and receipt of waste from 6:00 am through 8:00 pm Monday through Sunday. The landfill may operate for shorter periods of time and fewer days of the week but not longer. All auxiliary and landfill operations will occur between 5:00 am and 10:00 pm and waste will only be accepted between 6:00 am and 8:00 pm.

Material Types

4-3

Landfills I and II are currently permitted only to receive Non-Hazardous Waste and with this consolidation and expansion there will be no additional waste types accepted. TPH Contaminated Soil is included in the Non-Hazardous Waste.

**Letter No. 4,
Continued**

DEIR Antelope Valley Public Landfill

January 12, 2006

A City-initiated and approved Household Hazardous Waste service center is located within the existing Ancillary Facilities parking lot.

Landfill Buildings

4-4

Any buildings to be constructed or sited above buried waste or within 1000 feet of buried waste must comply with Title 27 California Code of Regulations (27CCR) Section 21190. If there are any questions regarding Section 21190 contact Mike Wochnick, Supervisor – Remediation, Closure and Technical Services Branch, at 916.341.6318.

Peak tonnages are as follows

- **Peak Tonnage 5548 total tons per day (inclusive of Solid Waste, TPH Contaminated Regulated Soil, Recyclables and ADC)**
- 540 tons per day of TPH Contaminated Regulated Soil – 15 percent of daily intake of solid waste (3600 tons per day)
- 3600 tons per day of solid waste (The 540 tons per day of TPH Contaminated Soil are a part of the 3600 tons per day of solid waste)
- 1948 tons per day of Recyclables and Alternative Daily Cover

All material entering the landfill for disposal, beneficial reuse, recycling or any other purpose, other than supplies and equipment, will fall into one of the categories of material listed above; TPH Contaminated Soil, Solid Waste, Recyclables and Alternative Daily Cover.

4-5

If the above information is not correct regarding the total tonnage entering the landfill please provide that information in the Final Environmental Impact Report. Tonnages for Construction, Demolition and Inert material, Green Waste and Wood Waste etcetera, including any material used for beneficial reuse must be included. What is the peak tonnage of clean soil to be imported on a daily basis? Any additional vehicle/truck trips necessary to import and export material need to also be analyzed for.

Recycling Drop-off/Transfer Center

4-6

Briefly describe the proposed recycling center in the Final Environmental Impact Report. If this is a “traditional” buyback recycling or drop-off recycling center for beverage containers the volume or tonnage would not count against the peak tonnages of the landfill – *if not the tonnages must be discussed in the Final Environmental Impact Report and included in the peak tonnages for the landfill.*

Alternative Daily Cover

4-7

The only types of Daily Cover/Alternative Daily Cover approved for use at this landfill are soil, contaminated soil and tarps. If it is the intent of the operator to utilize any other types of Alternative Daily Cover please disclose the types and discuss their application or usage to the specific environmental situations at Antelope Valley Public Landfill.

**Letter No. 4,
Continued**

DEIR Antelope Valley Public Landfill

January 12, 2006

Environmental Justice

4-8

Environmental Justice is not part of statute or regulations involving CEQA or the operation and evaluation of environmental documents relating to proposed projects that fall under the purview of the Board. Board members have taken a proactive stance towards environmental justice and expect that it be included and considered in projects coming before them for concurrence. The Board has included Environmental Justice as a major component in the Strategic Plan. The Strategic Plan can be found on the Board website at <http://www.ciwmb.ca.gov/BoardInfo/StrategicPlan/2001/>.

Odor Impact Minimization Plan (OIMP)

4-9

An Odor Impact Minimization Plan will be necessary since this site handles compostable material. One should be completed and included in the Mitigation Reporting or Monitoring Program and/or the Report of Facility Information/Joint Technical Document. Information on an Odor Impact Minimization Plan is available on the Board website at <http://www.ciwmb.ca.gov/regulations/Title14/ch31.htm#article3> or refer to 14CCR Section 17863.4.

Peak Elevation

4-10

The environmental document analyzes for a peak elevation of 3200 feet above mean sea level. Does this peak elevation include final cover? *If it does not include final cover what will the peak elevation be with final cover?*

Mitigation Reporting or Monitoring Program (MRMP)

4-11

The MRMP should indicate the agencies designated to enforce mitigation measures as described in the draft environmental document and that they have agreed to perform this function and have the authority and means to accomplish the designated enforcement responsibilities.

BOARD CEQA REVIEW

See the enclosure for a discussion of the Board’s responsibility under CEQA.

4-12

SUMMARY

Board staff requests *hard* copies of any subsequent environmental documents including, the Final Environmental Impact Report, the Report of Facility Information, Statement of Overriding Considerations, copies of public notices and any Notices of Determination for this project. Please refer to Title 14 California Code of Regulations, Section 15094(d) that states: “If the project requires discretionary approval from any state agency, the local lead agency shall also, within five working days of this approval, file a copy of the notice of determination with OPR.”
– [State Clearinghouse]

**Letter No. 4,
Continued**

DEIR Antelope Valley Public Landfill

January 12, 2006

4-12

The Environmental Review staff requests that the Lead Agency provide a copy of its responses to the Board's comments at least ten days before certifying the Final Environmental Impact Report. Refer to Public Resource Code, Section 21092.5(a).

If the document is certified during a public hearing, the Environmental Review staff request ten days advance notice of this hearing. If the document is certified without a public hearing, the Environmental Review staff requests ten days advance notification of the date of the certification and project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6728 or email at rseamans@ciwmb.ca.gov.

Sincerely,



Raymond M. Seamans
Permitting and Inspection Branch
Environmental Review, Region 4
Permitting and Enforcement Division
California Integrated Waste Management Board

Enclosure

cc: Bill Marciniak
Permitting and Inspection Branch, Region 4
Permitting and Enforcement Division
California Integrated Waste Management Board

Suzanne Hambleton, Supervisor
Permitting and Inspection Branch, Region 4
Permitting and Enforcement Division
California Integrated Waste Management Board

Kenneth Murray, Program Manager
County of Los Angeles
Department of Health Services
5050 Commerce Drive
Baldwin Park, CA 91706

Letter No. 4, Continued

BOARD CEQA REVIEW

As a Responsible Agency under CEQA, the Board's Environmental Review Section staffs comments on environmental documents are intended to assist the Lead Agency in developing an environmental document that will be as complete and adequate as possible for use by the Lead Agency and all Responsible Agencies.

The Environmental Review Section staff's comments are intended 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 the CEQA statutes and guidelines.

When performing the initial review of a CEQA document such as a Draft Environmental Impact Report or Negative Declaration during the circulation process, the first analysis the Environmental Review Section staff must make is to evaluate whether or not the proposed CEQA document clearly describes all phases of the project and assesses all potential primary and secondary impacts to the environment and/or public health and safety that could occur if the proposed project is implemented.

When evaluating the adequacy of an environmental document for purposes of SWFP concurrence, the Environmental Review Section staff must compare the design and operation of the facility as described in the proposed SWFP with the project as described and evaluated in the environmental document cited for CEQA compliance in the proposed SWFP.

In order for Board staff to evaluate and recommend whether or not the environmental document is adequate for use in the Board's permitting process, the proposed project must be described in sufficient detail for the Environmental Review Section staff to understand and evaluate the proposed project, potential environmental impacts, proposed mitigation measures, and findings as presented by the Lead Agency.

When the proposed SWFP is received by the Board along with the citation of evidence of CEQA compliance by the Local Enforcement Agency (LEA), the second analysis performed by the Environmental Review Section staff is to evaluate whether or not the CEQA evaluation in the cited environmental document supports the requested specifications, revisions, and/or conditions of the proposed SWFP. For instance, does the environmental document clearly describe and assess the potential air quality, water quality, geological impacts, traffic, noise, dust, vector and other health and safety impacts that can be associated with the proposed solid waste facility or changes in design and/or operation? When this type of information is included and addressed in the environmental document, the SWFP concurrence process is greatly facilitated.

After comparison of the cited CEQA document with the proposed SWFP, the Environmental Review Section staff makes a recommendation to the Board regarding the adequacy of the CEQA document for the Board's SWFP concurrence purposes. The Board members make the final determination of the adequacy of the CEQA document for SWFP concurrence as well as whether or not to concur in issuance of the SWFP.

Response to Letter No. 4
California Integrated Waste Management Board – January 12, 2006

Response 4-1Statement of Overriding Considerations

The comment is acknowledged; consistent with Section 15093 of the CEQA Guidelines, a statement of overriding considerations has been prepared for the project cumulative unavoidable impacts related to Aesthetics, Air Quality, and Traffic. A copy of the statement will be forwarded to CalRecycle (referred to as the Board in 2006) upon finalization by the City of Palmdale.

Response 4-2Hours and Days of Operation

The comment is acknowledged and accurately restates the proposed hours of operation. There is no "*italicized*" text included within the comment for which the Board is seeking a response.

Response 4-3Material Types

The comment is acknowledged and accurately restates the proposed material/waste types. Although mentioned in the first full paragraph of page 3 of the Comment Letter #4, there is no "*italicized*" text specific included within the comment for which the Board is seeking a response.

Response 4-4Landfill Building

The comment is acknowledged. Any future structure sited above buried waste or within 1000 feet of buried waste will comply with Title 27 California Code of Regulations (27CCR) Section 21190.

Response 4-5Peak Tonnage

The comment is acknowledged and accurately represents the proposed peak tonnages analyzed in the EIR. The peak tonnage of clean soil to be imported to the landfill will vary on a daily/weekly basis; however, it will still be within the 5,548 tpd, not exceeding that limit.

Response 4-6Recycling Drop-off/Transfer Center

The proposed ancillary facility conceptually shown on Figure 1-5 of the Draft EIR would function as a “traditional” buyback recycling or drop-off recycling center for beverage containers.

Response 4-7Alternative Daily Cover

The comment is acknowledged. As indicated on page 3-18 of the Draft EIR, “The waste cell is covered daily and compacted with a minimum of 6 inches of clean soil or with approved ADC material. Currently, tarps are approved for ADC use.” The operator is also currently looking at the possible use of green waste as an approved ADC material. As indicated in the EIR, the ADC would not be utilized without prior approval from the LEA.

Response 4-8Environmental Justice

The comment is acknowledged. Although mentioned in the first full paragraph of page 3 of the Comment Letter #4, there is no “*italicized*” text specific included within this comment for which the Board is seeking a response. The operator will review the Strategic Plan and will address the Environmental Justice component as it relates to the project prior to bringing the project to Cal Recycle for concurrence.

Response 4-9Odor Impact Minimization Plan (OIMP)

The existing and proposed operation’s compostable material (greenwaste) is currently and will continue to be delivered from two sources: 1) grass clippings from curbside pickup programs, and 2) miscellaneous wood waste and brush. The curbside material (grass) will be utilized as approved alternative daily cover which is subsequently buried the following day. Miscellaneous wood waste and brush is ground and transported off-site, for energy conversion, within no more than 30-days of receipt of the raw material. These current operations which are proposed to continue with the project do not promote a composting character and therefore do not result in odor issues.

Response 4-10Peak Elevation

The peak elevation of 3200 feet above sea levels, as indicated in the Draft EIR will include the final cover.

Response 4-11**Mitigation Monitoring and Reporting Program**

Your comment is acknowledged. As part of the Final EIR, a Mitigation Monitoring and Reporting Program (MMRP) has been prepared in accordance with the CEQA Guidelines and is contained within Section 5.0 of this document. The MMRP was prepared pursuant to State of California Public Resources Code Section 21081.6. The City of Palmdale is the lead agency for the proposed project and, therefore, responsible for administering and implementing the MMRP. The MMRP includes the agencies designated to enforce mitigation measures, as described in the Draft EIR.

Response 4-12**Summary**

The comment is acknowledged and will be forwarded to the decision-makers for their review and consideration. Although mentioned in the first full paragraph of page 3 of the Comment Letter #4, there is no "*italicized*" text specific included within this comment for which the Board is seeking a response.

Letter No. 5

14 January 2006

Palmdale Planning Department
38250 Sierra Hwy
Palmdale, Ca. 93550

Attention Richard Kite, Sr. Planner

SUBJECT: Proposed AVPL CUP

5-1

In regards to the extended hours proposed in the new CUP, I would like to express my opposition. With the current and projected growth taking place in this section of the valley, these two land uses are becoming incompatible. City projections have 20% of its population moving into this corner of the valley.

I object to the extended noise hours of operation. The way to minimize the land use impacts between heavy industrial activity and its effects on the expanding residential area is to limit hours of operation. Does Waste Management have a real and material need to extend its hours of operation?

Do the current operation hours vs. Refuse TPD truly require an extension in hours? This type of analysis would give the city the ability to make a proper evaluation for extended hours vs. impacts on the growing residential population.

5-2

The EIR should contain current daily and hourly averages of trucks and TPD. What is the current average TPD during the current hours? What is the projected deltas with the proposed extended three hours of operation?

5-3

I would also object to any extension of hours of the bird abatement activity. What are the city's rules for bird abatement if operating hours are extended?

5-4

In regards to the increase of daily refuse intake/TPD, total processed trucks and extended hours of operation, I am concerned about the increased traffic and adverse impacts to our community. I know that the entrance road into the AVPL is being changed. However, my concern is the cumulative traffic impact of: increased AVPL traffic, soccer park, new school/learning center on Ave R, a new hospital, a new proposed major commercial development on S & Tierra Subida as well as the Ana Verde and Ritter Ranch traffic. My apprehension is under-planned/over used intersections like that at Rancho Vista and 10th Street West.

Individually, each of the above projects requires a traffic study. How does the city accurately assess the aggregate traffic impacts of the above projects?

5-5

When Landfill I is full and no longer operational, what is the allowed daily vehicle access #?

5-6

Maintaining the current hours and not expanding the refuse, TPD would add to the operational life of the landfill. Has the analysis been done on the current LF plan and life expectancy with current hours and TPD limits to that of the current proposed expansion of the new CUP?

**Letter No. 5,
Continued**

5-7

Further concern is over the aesthetic looks of the project. Per the City General Plan Objective CD2.4 the city wants to create a sense of arrival. Also, ER3.1.5 was written to protect the visual quality of our hillsides.

Why weren't multiple visual simulations accomplished for the entrance/main views of the valley from the AV freeway? I would like to see this analysis and photo simulation and see how it aligns with the prior mentioned city objectives and policies.

The EIR generally states that minimum impact would come from connecting the two landfills. I would think the city would be interested in seeing the Condition B of the above simulations before that statement can accurately be assessed.

Connecting the two landfills has the potential to detrimentally and permanently influence the "Sense of Arrival" with a flat sided, flat topped man made mountain and ridge line. The valley between the two landfills may allow for some recovery to a semblance of a natural looking hillside and ridge line.

The above analysis should also be used for determining the suitability of the proposed change in height.

5-8

What is the city's plan for when these landfills are full? Where is the next landfill to be located?

What is the life expectancy with and without the connecting landfill?

5-9

Depending on the evaluation of the simulations from the AV freeway, is this expansion worth the impacts to the city's primary entry view?

I look forward to your response and the EIR becoming a better document so the city is able to make the best possible decisions.

Respectfully Yours



Steve Schirmbeck
37440 10th St West
Palmdale, Ca. 93551

Response to Letter No. 5
Steve Schirmbeck – January 14, 2006

Response 5-1

The comment is acknowledged and will be forwarded to the decision-makers for their review and consideration.

With respect to the commentor's statement regarding "extended noise hours of operation," Section 4.5 of the Draft EIR provides a detailed analysis of project noise impacts (including operational noise). It should be noted that although the hours for the "receipt of refuse" are proposed to be expanded from 5:00 p.m. to 8:00 p.m. as part of this project, there are no changes proposed for the "landfill operational hours." Noise associated with the expanded receipt of refuse hours from 6:00 p.m. to 8:00 p.m. (i.e., traffic noise from delivery of refuse to scales) would fall well below the City of Palmdale Noise Standards. No significant noise impacts associated with the increased receipt of refuse hours are anticipated. If any noise nuisance were to be experienced at any existing or future residential uses, it would be more from single event noise rather than from hourly or daily average. Based upon the analysis of single event noise sources, the proposed project operations would not exceed the City of Palmdale Noise Standards. However, because single event noise sources may be intrusive even if standards are not exceeded, Mitigation Measure 4.5-2 is proposed to ensure noise levels remain at less than significant levels.

Mitigation Measure 4.5-2: Operational activities before 6:00 a.m. or after 8:00 p.m. shall be restricted as follows:

- a. No receipt of refuse or unloading activities shall be conducted during those hours.
- b. No heavy equipment operation within 1,000 feet of any residence under clear line-of-sight conditions shall take place during those hours.
- c. No bird repellent activity using sound generators shall occur before 7:00 a.m. or after 8:00 p.m.

Please refer to Section 3.3.2 of the Draft EIR which provides information on the "Future Demand and Project Needs." This section explains the relationship between population growth and existing and future landfill operations and capacity. Lastly, as indicated in Section 4.6 of the Draft EIR, the proposed increase in the landfill's hours of operation may assist in reducing the amount of incidental dumping which has occurred in the past along the landfill access road.

Response 5-2

The Draft EIR including Technical Appendix G – Traffic Impact Analysis prepared by Kunzman Associates, contains the current daily and peak hourly averages of trucks, including tons per day. Please refer to Tables 4 of the traffic study and 4.7-4 of the Draft EIR – “Project Truck Traffic”; Table 5 of the traffic study– “Traffic Schedule for Antelope Valley Landfill Average and Peak Inflow of Material”; and Tables 6 of the traffic study and 4.7-5 of the Draft EIR – “Project Traffic Generation” for the request information.

Response 5-3

As stated above in Response 5-1; the proposed extended hours are for the “Receipt of Refuse” and not bird abatement activity. Mitigation Measure 4.5-2 (see response 5-1 above) actually restricts bird abatement activity beyond what is currently permitted.

Response 5-4

The purpose of a traffic impact analysis is to address exactly what the impact will be when the project traffic is added to existing and other approved project’s traffic. The Kunzman Associates traffic study and summary of it contained in Section 4.7 of the Draft EIR addresses these issues. Section 3.5 of the Draft EIR outlines the “Cumulative Project Approach Assumptions” for the analysis. To address cumulative projects, individual projects are accounted for at two levels. One is at the General Plan level where the ultimate land use and the ultimate circulation system are in harmony. At the intermediate level, between now and when individual approved projects are added, each project has to show that its traffic along with other traffic growth can be added to the existing system and that it will operate at acceptable levels.

Response 5-5

As discussed in Section 3.0 of the Draft EIR, the AVPL currently has two fully permitted landfills within its property, Landfill I and Landfill II. As shown in Table 3-2 – “Existing/Permitted and Proposed Project Components,” Landfill I has a daily disposal limit of 1,400 tpd with a maximum permitted truck limit of 434 trucks or a total of 868 truck trips per day. Landfill II, which was permitted by the County CUP #98041, has a 1,800 tpd limit for buried waste and has no established limits on daily vehicle traffic. As shown in Table 3-2 and discussed in Section 4.7 of the EIR, the CEQA and supplemental traffic analysis prepared for Landfill II assumed up to 550 trucks or a total of 1,100 truck trips per day. The permitted and proposed average/peak total trip (trucks and cars) figures are shown in Table 4.7-1A. This table provides the total trip figures for what is currently permitted at Landfill II (1,460) versus what is proposed as part of this CUP (1,594).

Response 5-6

Please refer to Section 7.2 – Long-Term Implications for the analysis requested in this comment.

Response 5-7

Section 4.6 of the Draft EIR provides a detailed analysis of the visual impacts of the proposed project consistent with the CEQA Guidelines. The EIR analyses how the proposed expansion/reconfiguration project may impact the visual character of the area, and how visually compatible it would be with the surrounding development.

With respect to General Plan Policy 3.1.5, which encourages retaining and maintaining the integrity of the natural ridgelines of Ritter Ridge, Portal Ridge, Verde Ridge, the Ana Verde Hills, the Sierra Pelona Mountains, and the lower foothills of the San Gabriel Mountains, the EIR concludes that the project will generally conform to this policy through project design and mitigation requirements. The proposed landfill expansion and access road project will respect the integrity of the natural ridgelines and seek to preserve the aesthetic character of the Antelope Valley.

General Plan Objective CD 2.4 is to “Create a sense of arrival to Palmdale at major entrance points to the City, and enhance major focal points at designated locations throughout the City to create a unified sense of place.” The proposed project involves expanding the site by incorporating the gap of unused land between existing Landfills I and II by 11 acres. This proposed 11-acre increase in the landfill footprint would eliminate the valley between Landfills I and II once they are both filled. Thus, a more natural transition between the two landfills would result, and will create a more contiguous visual form consistent with the existing ridgeline. In addition, mitigation measures are included in Section 4.6 Aesthetics/Light & Glare of the Draft EIR to reduce the potential impacts to aesthetics to less than significant levels.

Additionally, as indicated in the Draft EIR, Golder Associates worked closely with City staff to select a “reasonable range” of views to be included within the visual simulation analysis which is not required by CEQA. The nine (9) locations which were selected from an array of existing photographic views provide a thorough representation of potentially impacted views for a project of this magnitude (i.e., an 11-acre expansion, 60-foot height increase and new landfill access road).

Based upon the visual simulation analysis, the EIR concluded the following, “It is evident from the visual simulations for permitted Landfill I and II and the proposed expansion/reconfiguration (Figures 4.6-2 through 4.6-10) that the difference between Conditions #2 and #3 (permitted Landfills I and II and the proposed expansion/reconfiguration) is minimal and hardly discernable through the simulations viewed from the north and east at view locations 1 through 5 (Figures 4.6-2 through 4.6-6). Partial views of the landfill can be seen at the closer northerly location 7. The landfill is visible above the existing ridgeline under the permitted and proposed project scenarios (Figure 4.6-8). Although it is difficult to see a difference between the “permitted” and “proposed” landfill conditions, it may be viewed to create a significant visual impact.

The “full view” of Landfills I and II and the “11-acre wedge” expansion area (only visible from the south, looking north, northeast, and northwest at view locations 6, 8, and 9) may be viewed to create a significant visual impact (Figures 4.6-8 through 4.6-10). However, it should be noted that the majority of Landfill I is already constructed and visible from the south. Landfill II is not constructed but permitted and environmentally analyzed in the previous 1992 certified EIR for Landfill II. (Therefore, Landfills I and II will exist regardless of the proposed expansion/reconfiguration. This section of the EIR document analyzes the “project specific” aesthetic impacts emanating from the expansion/reconfiguration, which proposes to fill the 400-foot gap that would exist between the two landfills at build-out and the increase in permitted height of Landfill II by 60-foot.

The proposed 11-acre increase in the landfill footprint would eliminate the valley between Landfills I and II once they are both filled. Thus, a more natural transition between the two landfills would result, and this would create a more contiguous visual form consistent with the existing ridgeline. The project also proposes a height increase to the landfill overall. The currently permitted Landfills I and II have a maximum height of EI 3,205 and EI 3,140, respectively. The proposed project would result in a maximum height of EI 3,200. The visual simulations reveal that this height increase is not visible or difficult to see from the eight (8) of the nine (9) viewpoints analyzed. The height increase is visible in Figure 4.6-10 as less of the existing ridgeline is visible from the south in Condition #3 (proposed project with height increase) as compared to Condition #2 (existing and permitted landfill).

Mitigation Measure 4.6-1 is proposed to reduce the project-specific aesthetic impacts from the south at view locations 6, 8, and 9 (Figures 4.6-8 through 4.6-10). As required by Mitigation Measure 4.6-1, interim vegetative cover will be applied as land filling proceeds to help offset visual impacts. The application of interim vegetation is not required under existing permits for Landfill I and Landfill II development. This interim measure requires extra effort and expense for preparation of slopes for seeding, provisions for irrigation and continuous maintenance, which would otherwise not be experienced until site closure and application of final cover/vegetation. Although duplicative and more costly, this interim measure will help to mitigate the visual impact associated with development of the already permitted Landfills I and II as well as the proposed landfill expansion project.”

Response 5-8

Disposal plans beyond year 2020 have not been formalized. Typically, options available for future disposal of the City’s waste, following the existing landfill reaching capacity, would include additional expansion of existing disposal sites, development of new disposal sites or development of a facility to receive, process, and transport waste to a distant disposal site.

Regarding the life expectancy with and without the connecting landfill, Section 7.2 of the Draft EIR discusses the life expectancy of the landfill with and without connecting the landfills and with and without the proposed increase in daily tonnage. If the expansion was not approved but

the daily tonnage increase was approved, the existing/permitted landfill's life expectancy with an intake of 3,600 tpd would be 7 years. With no wedge expansion and a daily intake of 1,800 tpd, the existing/permitted landfill's life expectancy would be 14.6 years. Please refer to Table 3-2 in Section 3.0 of the Draft EIR.

Response 5-9

Please refer to Response 5-7 above. Section 5.0 of the Draft EIR includes analyses of potential significance for four project alternatives. The Project applicant has decided to pursue City staff's recommendation of the Reduced Project Alternative (the 1,800 tpd disposal option), which is the current CUP-approved tonnage, as the environmentally superior alternative. Section VI of the CEQA Findings lists eleven (11) project benefits that would be realized with the Reduced Project Alternative's implementation:

- (1) The existing Landfill I is near its capacity and the expansion will allow for the continuation of this existing msw disposal service by providing an additional 12.8 million cubic yards of added landfill capacity, thereby saving City residents and businesses the environmental impacts and the economic costs of developing a new landfill or the higher cost of hauling wastes to a more distant landfill outside the area.
- (2) The Project will upgrade existing access to the landfill via a 2-lane (60-ft right-of-way) meeting City standards.
- (3) The Project will establish safe signalized ingress and egress from a new intersection at Tierra Subida Ave and Rayburn Rd.
- (4) The Project will contribute drainage impact fees per City Ordinance.
- (5) Anaverde Creek slope protection improvements to be done as a condition of the project will reduce sediment impact on downstream City facilities.
- (6) The Project will extend the useful life of the landfill, thereby roughly doubling the number of years that the City will receive City host fee revenues derived from landfill operations. The wedge expansion would result in an additional 20-25 million dollars in host fees to the City of Palmdale.
- (7) The Project will provide additional employment associated with the various construction jobs required.
- (8) The Project implements sustainability principals through the inclusion of mitigation measures requiring energy production by a LFGTE project upon meeting certain threshold criteria,

increased diversion of organic material, increased recycling, and other measures resulting in reductions of GHG emissions (MM 4.2-6).

(9) The Project provides a balance between providing essential landfill services, increasing diversion and recycling, protecting the environment, and providing economic development opportunities. The Project will ensure recycling services for its community members while continuing to serve the demand for a diverse range of disposal and recycling services. The applicant will also continue educational programs (such as “Caught Green Handed” and “Ready Set Go Green”) to promote a better understanding in the community of the need to reduce, reuse and recycle by continuing to offer tours, a recycling drop off box, and other programs at the site (such as the Landfill Open House event). Additionally, private tours of the landfill are available upon request.

(10) The Project provides for orderly and safe disposal of solid waste generated in the local area, both in the short term and the long term, which is a necessity in a modern society.

(11) The Project would allow the project applicant to continue supporting local community endeavors. The AVPLF has historically supported a number of non-profit and community organizations and serves as a resource for residents and businesses throughout the City. Some of the community-based organizations/events that have received financial and in-kind support from the AVPLF include: Antelope Valley Boys and Girls Club, AV High School Teen Builders, the American Legion Post, Highland High school – Relay for Life, Palmdale Chamber of Commerce, Antelope Valley Sheriff’s Boosters, Palmdale Sheriff’s Boosters, Palmdale SAVES Organization, and Palmdale Salute to Youth Foundation. In addition, the AVPLF sponsored illegal dumping cleanup projects for Palmdale High School, the Elks Lodge, and Cornerstone Apostolic Church.

Consistent with Section 15093 of the CEQA Guidelines, the Planning Commission for the City of Palmdale is required to adopt a Statement of Overriding Considerations for unavoidable adverse impacts which includes the cumulative effect of the proposed 11-acre wedge expansion and height increase, the existing Landfill I, the permitted Landfill II, and the access roadway upon the existing visual character and the views south of the landfill. Additionally, the Planning Commission will need to balance these substantial social and economic benefits against the unavoidable significant adverse effects of the proposed project. California Administrative Code, Title 14, 15093(a) states: “If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered ‘acceptable.’”

Letter No. 6

STATE OF CALIFORNIA

ARNOLD SCHWARZENEGGER, *Governor*

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

January 24, 2006

Richard Kite, Senior Planner
City of Palmdale-Planning Dept.
38250 Sierra Highway
Palmdale, CA 93550

Dear Mr. Kite:

Re: SCH# 1990010988; Antelope Valley Public Landfill Expansion

As the state agency responsible for rail safety within California, we recommend that any development projects planned adjacent to or near the Union Pacific Railroad Company right-of-way be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

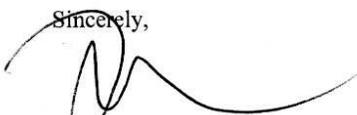
6-1

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the City.

Please advise us on the status of the project. If you have any questions in this matter, please contact me at (213) 576-7078 or at rxm@cpuc.ca.gov.

Sincerely,



Rosa Muñoz, PE
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection & Safety Division

C: Richard Gonzales, UP

Response to Letter No. 6
State of California, Public Utilities Commission – January 24, 2006

Response 6-1

The comment is acknowledged. As indicated on page 38 of the project Initial Study/NOP contained in Appendix A of the Draft EIR, the proposed landfill consolidation project is not located adjacent to or near the Union Pacific Railroad Company right-of-way, and therefore, the project will not involve any rail corridor safety related issues as part of project implementation.

Letter No. 7

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 MAIN STREET, Suite 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-3747
FAX (213) 897-1337
TTY (213) 897-4937



*Flex your power!
Be energy efficient!*

January 24, 2006

IGR/CEQA cs/051237 – Supplemental DEIR
City of Palmdale
Antelope Valley Public Landfill CUP
S. Of Ave. R and W. of 10th St. West
Vic. LA-14-58.34; SCH # 1990010988

Mr. Richard Kite
City of Palmdale
Planning Department
38250 Sierra Highway
Palmdale, California 93550

Dear Mr. Kite:

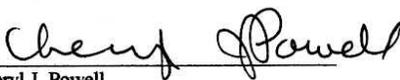
Thank you for including the California Department of Transportation in the environmental review process for the above-mentioned project. Based on the information received, we have the following comments:

7-1

It appears that the proposed expansion of the existing Antelope Valley Landfills I and II by itself will not have a significant impact on the freeway system. However, we recommend that heavy-duty truck trips on State highways be limited to off-peak commute periods. Also, the contractor should agree to avoid excessive or poorly timed truck platooning (caravans of trucks) to minimize transportation related operational conflicts such as queuing of trucks, minimize air quality impacts, and maximize safety concerns.

If you have any questions regarding our comments, please refer to our IGR/CEQA Record number cs/051237 and do not hesitate to contact me at (213) 897-3747.

Sincerely,


Cheryl J. Powell
IGR/CEQA Program Manager

cc: Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"

Response to Letter No. 7
Department of Transportation, District 7 – January 24, 2006

Response 7-1

As indicated by the commentor, the proposed project will not have a significant impact on the freeway system. Specifically, Section 4.7 of the Draft EIR concludes “The State Route 14 Freeway, south of Avenue S, receives a maximum of 10 percent of the project’s traffic (see Figure 4.7-5 and Table 4.7-1A). This includes 70 vehicles per day for average inflow conditions and 97 vehicles per day for peak inflow condition. The SR 14 south of Avenue S has 70,000 vehicles per day per the latest available Caltrans counts, and the added project vehicles represents about a 0.14 percent increase which is insignificant. Per the Los Angeles Congestion Management Program (LACMP) section D.4, 150 added vehicles in the peak hour is considered a significant impact and would trigger future traffic impact analysis. As stated above, the proposed project would add far less than 150 vehicles for the entire day and the project peak hour trips on SR-14 would be even less than the daily figure.

Therefore, while the operator will most likely avoid peak commute periods on state highways and excessive or poorly times truck platooning (caravans of trucks), the EIR conclusions do not support a formal requirement for such restrictions.

Letter No. 8



DONALD L. WOLFE, Director

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
www.ladpw.org

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

January 26, 2006

IN REPLY PLEASE
REFER TO FILE: **EP-2**

Mr. Richard Kite
Senior Planner
Planning Department
City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550-4609

Dear Mr. Kite:

**RESPONSE TO DRAFT ENVIRONMENTAL IMPACT REPORT
ANTELOPE VALLEY PUBLIC LANDFILL CONDITIONAL USE PERMIT
(SCH NO. 1990010988)**

Thank you for the opportunity to provide comments on the proposed project. The project consists of modifications to the existing County-approved Conditional Use Permit. As part of this new proposal, the existing County-approved Conditional Use Permit would be replaced by a City of Palmdale Conditional Use Permit, since the City of Palmdale annexed a portion of the Landfill that was previously located in County unincorporated areas on November 21, 2003. The City of Palmdale is the lead agency.

The proposed modifications include expanding the aggregate 114-acre refuse footprint by approximately 11 acres to combine two landfills into one disposal area, increase the facility boundary from 180 acres to 185 acres to accommodate additional ancillary facilities, and update the legal boundary of the combined facility. A daily tonnage increase from 1,800 to 3,600 tons per day is also requested. These modifications will provide an increase of 12.8 million cubic yards of capacity beyond existing permit levels. Based upon a disposal tonnage of 3,600 tons per day, the combined life of the two landfills would total approximately 17 years. We have reviewed the submittal and offer the following comments:

**Letter No. 8,
Continued**

Mr. Richard Kite
January 26, 2006
Page 2

Environmental Programs Division

We previously submitted comments on this project on April 12, 2004. However, the following comments still remain unaddressed in this Draft Environmental Impact Report:

- 8-1
- Should any operation within the project include the construction/installation, modification, or removal of underground storage tanks and/or industrial waste control system/facility, our Environmental Programs Division must be contacted for required approvals and operating permits.

- 8-2
- The proposed expansion of the Antelope Valley Public Landfill will require a Finding of Conformance from the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force. This is in accordance with the requirement of the Los Angeles County Countywide Siting Element (which is approved by a majority of cities containing a majority of the population in the County), the County of Los Angeles Board of Supervisors, and the California Integrated Waste Management Board.

- 8-3
- The Draft Environmental Impact Report should include a discussion on how the proposed project will meet each of the Disposal Facility Siting criteria identified in the Siting Element (Chapter 6, Volume 1, and Appendix 6-A, Volume 3).

If you have any questions, please contact Mr. Siya Araumi at (626) 458-4991.

Watershed Management Division

- 8-4
- The project should clearly demonstrate that all water quality impacts are mitigated so that surface water runoff and groundwater are not impaired. Also, the project should not impair the flood conveying capacity of the Anaverde Creek. We also recommend that reclamation efforts include investigation of water quality devices, native landscaping, and retention of local rainfall. Our comments from the past Draft Environmental Impact Report review also still apply.

If you have any questions, please contact Mr. Bruce Hamamoto at (626) 458-5918.

Traffic and Lighting Division

- 8-5
- We generally agree with the study that the traffic generated by the project alone, or the cumulative traffic generated by the project and other related projects will not significantly impact the County and County/City intersections in the area. We also agree with the

**Letter No. 8,
Continued**

Mr. Richard Kite
January 26, 2006
Page 3

8-5

impact the County and County/City intersections in the area. We also agree with the study that the project will not have significant impacts to the Congestion Management Program monitored intersections, arterials, or freeways. If you have any questions, please contact Ms. Amanda Ta at (626) 300-4766.

If you have any questions regarding the above comments or the environmental review process of Public Works, please contact Mr. George De La O, of this office, at (626) 458-5184.

Very truly yours,

DONALD L. WOLFE
Director of Public Works



CARLOS RUIZ
Assistant Division Engineer
Environmental Programs Division

SA:sm
P:\sectengineer\eir-antelope valley public landfill cup.doc

Response to Letter No. 8
County of Los Angeles, Department of Public Works – January 26, 2006

Response 8-1

The comment is acknowledged. The Environmental Programs Division will be contacted for required permit approval and operating permits should the project include the construction, modification, or removal of underground storage tanks and/or Industrial Waste Control System/facility.

Response 8-2

The comment is acknowledged. A Finding of Conformance (FOC) was confirmed in 1995 for the AVPL. The proposed “expansion” would combine the existing two landfill modules of the AVPL by bridging a small 11-acre gap which currently exists between the two permitted sites within the same property boundary. Table 2-1 – “List of Potential Responsible Agencies/Project Approvals” has been modified to include the County Solid Waste Management Committee/Integrated Waste Management Board should a second FOC be required. Please refer to the Errata contained in Section 4.0 of the Final EIR document.

Response 8-3

The proposed AVPL expansion serves to fulfill the County’s Disposal Facility Siting criteria by adding more landfill capacity and extending the life (beyond 15 years) of a site that previously received a FOC in 1995. Table 3-2 of the Draft EIR illustrates the site life/remaining capacity with and without the proposed project.

Response 8-4

Please refer to Response 3-2 which addresses the concerns regarding the project’s potential Surface Water quality impacts. With respect to groundwater quality impacts; Section 4.3 of the Draft EIR concludes; “The groundwater quality of the small sub-basin containing the existing landfill facility and proposed expansion is of poor quality and non-potable. Water infiltration into the landfill may generate leachate which could have an adverse impact on the existing groundwater. For instance, excess water used for dust-control water could create the potential for leachate formation within the landfill mass. Based on the conclusion that the existing facility and proposed expansion area are hydraulically isolated from adjacent basins, and a leachate collection and removal system are proposed, minimal impacts are anticipated. With the implementation of the LCRS, Composite Liner System, and the Groundwater Monitoring System, no damage to the surrounding water basins will occur from the proposed continued landfill activities and potential impacts will be reduced to a level of insignificance.”

Section 4.3 of the Draft EIR and Appendix D also address the project’s potential impacts on the Flood Conveying Capacity of the Ana Verde Creek. The conclusions of the calculations indicate

that the post-development flows without debris basins of 290 cfs do not meet the City of Palmdale's 85 percent pre-development attenuation criteria of 226 cfs. Without mitigation or design improvements, this could be considered a significant impact. However, two sedimentation/detention basins are proposed to eliminate potential impacts. The post-development (with debris basins) flows of 160 cfs meet the 85 percent pre-development attenuation criteria. Therefore, the project impacts are less than significant and would not have an effect on the flood conveying capacity of the Anaverde Creek.

Lastly, the proposed project does not include reclamation efforts nor any proposed irrigation systems.

Regarding past comments on the previous Draft EIR, those comments were responded to, in accordance with CEQA requirements, and included in the Final EIR for the Antelope Valley Public Landfill Expansion, dated February 1992.

Response 8-5

The comment is acknowledged and will be forwarded to the decision-makers for their review and consideration.

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Letter No. 9



**California Regional Water Quality Control Board
Lahontan Region**



Alan C. Lloyd Ph.D.
Agency Secretary

Victorville Office
14440 Civic Drive, Suite 200, Victorville, California 92392-2306
(760) 241-6583 • Fax (760) 241-7308
<http://www.waterboards.ca.gov/lahontan>

Arnold Schwarzenegger
Governor

January 27, 2006

WDID Nos. 6B199402002
6B190335001

Richard Kite, Associate Planner
City of Palmdale Planning Department
38250 Sierra Highway
Palmdale, CA 93550

**RESPONSE TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, ANTELOPE VALLEY
PUBLIC LANDFILL CONDITIONAL USE PERMIT, PLAN NO. 1990010988,
LOS ANGELES COUNTY**

Regional Water Quality Control Board staff (Board staff) has reviewed the above-mentioned report, received on December 16, 2005. Thank you for providing Board staff with the opportunity to review this document. Based on this report, Board staff understands the following about the project.

1. The proposed project site is located at 1200 W. City Ranch Road within the City of Palmdale. Current permitted facilities on this site include two separate municipal solid waste landfills, one is operating the other has not been constructed.
2. The project description proposes to modify the existing L.A. County Use Permit to add 11 acres to the refuse footprint and thus create one contiguous disposal area and increase landfill capacity by approximately 14 million cubic yards.
3. This project would increase the total facility boundary from 180 to 185 acres to accommodate ancillary facilities, and
4. Update the description of these boundaries to encompass a single facility.

Based on the information contained in this Environmental Impact Report (EIR), Board staff has the following comments.

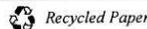
9-1

5. The project will require groundwater monitoring which is discussed briefly on page 3-30, however the draft EIR does not describe any proposed mitigation to be taken in the event of a detected release of a contaminant to groundwater.

9-2

6. Project Impacts in Section 4.1.1, second paragraph, last sentence. "No AP Zone is present within the 11-acre expansion area." this statement is incorrect based on the maps provided in the Draft EIR.

California Environmental Protection Agency



**Letter No. 9,
Continued**

Mr. Kite

- 2 -

January 27, 2006

9-3

7. Board staff has completed a preliminary review of the slope stability analyses included in Appendix A to the Draft EIR. At this time Board staff cannot support the conclusions contained in the report, which predicted less than six inches of deformation for the base and slope liner system due to a large earthquake event along the San Andreas Fault near the Antelope Valley Landfill. Therefore, Board staff cannot concur with less than significant impact due to earthquake ground shaking and the proposed liner design that is proposed to adequately mitigate impacts to less than significant. In order to determine this, a more complete review of the analyses is required.

9-4

8. In Section 4.3-2 (Potential for erosion at the north bank of the Anaverde Creek) the proposed mitigation is to engineer a concrete-lined system along the north bank of the creek within the project boundaries. Board staff is concerned with the conclusions that no significant impacts are anticipated following this mitigation as stated on page 4.3-12. Alteration of a stream course that has the potential to change the natural movement of water/sediment load could change the stream's course and sediment load upstream of those alterations. This could affect the overall water quality of the stream run-off. The project should include a discussion concerning this aspect of the mitigation/impacts. Board staff would also add that any alterations to this streambed will require reviewed by the Lahontan Regional Water Quality Control Board.

9-5

9. The project may result in spills that will adversely impact ground and surface waters. Include spill contingency measures in the environmental document.

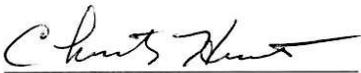
9-6

10. Please correct a text error on page 4.3-12 located in the first paragraph, line eleven. The sentence starts with "requirements as well as maintain..."

9-7

Please note that obtaining a permit and conducting monitoring does not constitute adequate mitigation. Development and implementation of acceptable mitigation is required.

Thank you for your attention to these comments. If you should have any questions regarding this issue, please contact me at (760) 241-7377.

Sincerely

 Print Name Christy Hunter
 Title Engineering Geologist
 Phone No. (760) 241-7377
 E-Mail chunter@waterboards.ca.gov

CH\rc\U:\M\AntelopeVLF_DraftEIR_Exp_BSRsp.doc

Response to Letter No. 9
California Regional Water Quality Control Board,
Lahontan Region – January 27, 2006

Response 9-1

The Draft EIR includes a discussion of the proposed additions to the existing groundwater monitoring system on page 3-20. Please also refer to page 3-19 and Section 4.3 of the Draft EIR which discuss additional measures to be taken to prevent groundwater contamination including the proposed Leachate Collection and Removal System (LCRS), consistent with the California Code of Regulations. Additionally, current site policies and procedures include a Spill Prevention Control and Countermeasures (SPCC) plan which are actively followed and will continue to be part of the AVPL operating procedures for the expanded landfill, also consistent with existing statutory and regulatory requirements in place for purposes of protecting water quality.

Response 9-2

The comment is acknowledged. The statement on page 4.1-10 was a typographical error and is incorrect and not consistent with Figure 4.1-1 nor Appendix B of the Draft EIR. The statement has been removed to correct this error in the Final EIR. Page 4.1-10 has been corrected and included as errata to the Draft EIR in Section 4.0 of this Final EIR document.

Response 9-3

City staff and their consultants have worked closely with the RWQCB to address the concerns presented in this comment. A conference call was held on February 15, 2006 between RWQCB (Christy Hunter and Cindy Minton), EDAW, the preparer of the Environmental Impact Report (EIR) (Jayna Morgan), Golder, the Engineer for the project (Scott Sumner, P.E.) and the City of Palmdale (Richard Kite) Project Case Planner.

Based upon the discussions of the conference call, City staff agreed to draft a follow up letter to Christy Hunter and further clarify Mitigation Measure 4.1-1 of the Draft EIR. Golder Associates also agreed to provide a response which would outline the justification for their Slope Stability Analysis, Liner Design and base grading plans.

The formal response prepared by Golder Associates is as follows:

A. BACKGROUND

To provide some information on Golder, we are a global group of consulting companies, specializing in ground engineering and environmental science. Operating as an employee-owned group since its formation in 1960, Golder Associates has created a unique culture with

pride in ownership and a commitment to providing technically sound and cost-effective consulting and contracting services. In the United States almost 40 percent of our business is to provide engineering and environmental consulting services for landfill and mining operations.

Golder Associates has experienced steady growth for more than four decades and has more than 4,500 employees world-wide, including almost 1,000 in the United States. Our growth and diversity of services have paralleled the needs of our clients as they operate in an ever-changing and complex environment.

We established our Irvine office in 1995 and have been serving southern California since this time. Additional information on Golder Associates may be found at our web site at www.golder.com.

For the AVPL expansion project, our key team members include:

- Mr. Scott Sumner, P.E. as Project Manager. Mr. Sumner has a Masters Degree in Geotechnical Engineering and has been designing and constructing landfills for over 20 years. Mr. Sumner has over 15 years of experience designing and constructing solid waste landfills in California.
- Mr. Michael Snow, P.E., G.E. as Principal Design Engineer. Mr. Snow provided key input to the design and evaluation of the proposed liner systems and geometric layout of the facility.
- Dr. Anthony Augello, P.E. was responsible for evaluation of the landfill's stability. Dr. Augello has performed stability analysis for numerous landfills in southern California. Dr. Augello's doctoral work focused on the evaluation of the seismic stability of solid waste landfills. His experience and education have allowed Golder to evaluate seismic stability for this project using the more sophisticated finite element technique.
- Dr. Alan Hull, C.E.G. is an internationally recognized authority on evaluation of earthquake hazards and assessment of geologic hazards from active faults. Dr. Hull and others evaluated the site geology and the nearby San Andreas Fault.

B. DESIGN APPROACH

The design of a landfill provides many unique challenges for engineers and regulatory agencies. Each project is different in that the soil and liner materials used for construction vary, the topography of the natural landscape varies, and the geologic setting can provide additional design considerations. For the AVPL one of the key elements is the site's proximity to the San Andreas Fault. The southern edge of the waste fill will be approximately 200 feet from the fault. When the maximum magnitude earthquake (M_w 7.8) occurs on this section of the fault, horizontal fault displacement could be up to 10 to 25 feet over a length of approximately 220 miles (350 km). An earthquake of this magnitude will generate large ground motions adjacent to the fault. Earthquake engineers utilize the lessons learned from past earthquakes to evaluate

the effects of future earthquakes on structures such as landfills. The study of geotechnical earthquake engineering began in earnest in the United States after the 1971 San Fernando earthquake. Over the past number of years design techniques ranging from simple (e.g., empirical analyses) to relatively complex (e.g., computer modeling) have been utilized. Most empirical analysis methods tend to provide reasonable, but conservative, estimates of landfill performance for most landfill designs. The Makdisi and Seed (1978) simplified analysis procedure provides conservative results for solid waste landfills. This was recognized by Bob Pyke in his July 6, 1994 letter discussing the results of his two-dimensional dynamic finite element analysis of the landfill. The Makdisi and Seed (1978) analysis method was originally developed for embankment dams. This method was based upon observations of dam performance during earthquakes and a limited number of dynamic finite element analyses. The conservatism in this method results from the significant differences in the geometries between dams and landfills and the lack of data points used to establish the design curves. The design curves developed by Makdisi and Seed (1978) are based on four to five dynamic finite element analyses of an embankment dam. Because of the lack of data, the authors established very conservative bounds on the design curves. This is one of the reasons that this method is still employed today.

In addition, in 1978 very little was known about ground motions from large magnitude earthquake events and near source ground motions. The number of recorded motions from large magnitude earthquakes worldwide has increased this understanding considerably. In addition, it is now recognized in seismology that the ground motions within about 6 miles (10 km) of the fault experience near source directivity effects. There are two directivity effects. The first effect is a change in the strength of shaking of the average horizontal component of motion (i.e., higher ground motions for rupture towards the site and lower ground motions for rupture away from the site). The second effect is systematic differences in the strength of shaking on the two horizontal components of motion oriented perpendicular and parallel to the strike of the fault (Abrahamson, 2000). Fault directivity effects are not included in simplified analysis procedures, but the directivity effects have been incorporated in the dynamic finite element analysis of the landfill through the selection of ground motions.

As discussed above, the proximity of the AVPL to the San Andreas Fault makes the use of the simplified analysis techniques overly conservative. Therefore, dynamic finite element analyses of the landfill slopes were performed. Through the use of this computer modeling, we were able to incorporate design features that reduced the amount of anticipated damage to an acceptable level.

C. REGULATORY FRAMEWORK

In the case of any structure in or near a seismically active area, which is true for most of southern California, there are typical standards established addressing seismically-induced

ground motions for design and construction. For example, the homes within Ritter Ranch (south of the San Andreas Fault) have been designed in accordance with the California Building Code (CBC). Similar standards have been established for landfills in Title 27 of the California Code of Regulations (CCR). CCR Title 27 stipulates that "Class III landfills shall have containment structures which are capable of preventing degradation of waters of the state as a result of waste discharges to the landfills if site characteristics are inadequate." To this end the landfill's waste mass and containment systems are being designed to withstand the Maximum Credible Earthquake (MCE). The MCE is the largest earthquake that can occur on a particular fault under the currently know tectonic framework.

D. DESIGN RESULTS

As required by CCR Title 27, Golder's analyses included an assessment of the seismic hazards and faulting within 100 km (62 miles) of the site. As expected, the MCE on the San Andreas Fault generates the largest ground motions expected at the site. The peak horizontal ground motions generated at the AVPL are estimated to be approximately 0.89 g (fault normal component) and 0.74g (fault parallel component). Two acceleration time histories were developed for the dynamic finite element analysis to incorporate fault directivity effects. Golder used several commercially available, state-of-the-art, computer models (UTEXAS3, TELSTA, and TELDYN) to model the behavior of the landfill during this level of earthquake shaking.

For the AVPL expansion project, Golder developed an iterative approach in designing the geometric layout of the landfill. Initial base grading and fill plans were developed to maximize the amount of waste that could be placed within the expansion area. Initial slope stability analyses indicated that excessive seismically induced permanent displacements along interfaces within the landfill base liner and final cover system may result if the initial plans were constructed. The next iteration included the incorporation of a stability buttress, effectively 60 to 70 feet in height, to provide additional reinforcement at the base of the waste slope. The stability buttress reduced the seismically-induced permanent displacements at the base of the landfill to less than 6-inches.

In the final iteration, the final fill grades were flattened to reduce the estimated seismically induced permanent displacements within the final cover system. The final configuration presented in the EIR reflects a design that is predicted to have less than 6-inches of permanent displacement along the base liner system and less than 36-inches of permanent displacement along the cover system following the MCE event. The engineering community and the RWQCB have accepted 6 inches as the maximum seismically induced permanent displacement that the base liner systems could accommodate without loss of containment. With less than 6-inches of displacement, the liner system is expected to meet the requirements of Title 27 and prevent the degradation of the waters of the state. Because the final soil cover system will be constructed entirely of soil and the cover system can be easily repaired, larger seismically induced

permanent deformations (up to five feet) are typically allowed within soil cover systems. The seismically induced permanent deformations presented in the EIR are consistent with the analyses performed by Bob Pyke in 1994 that estimated approximately four inches of displacement along interfaces within the base liner.

SUMMARY

While the RWQCB has expressed concerns over the stability analysis included with the EIR, Golder is confident that these concerns can be resolved. Given the site and its proximity to the San Andreas Fault it is critical that all involved parties have input into the stability evaluations and are all comfortable with the design methodologies and conclusions. Given that the RWQCB will also need to issue revised Waste Discharge Requirements (WDRs) for the project, they will be given additional opportunity to perform a more complete review, as requested, and seek clarification on inputs to the stability analysis when the Joint Technical Document is submitted.

Additionally, a follow up letter from Mr. Richard Kite was prepared and sent to Ms. Hunter on February 22, 2006. A copy of this letter is on file with the City of Palmdale Planning Department. Based on Ms. Hunter's March 9, 2006 electronic mail response to the February 22, 2006 letter, Mitigation Measure 4.1-1 was further clarified as follows:

Prior to the issuance of the Waste Discharge Requirements (WDR's) and approval of the Joint Technical Document (JTD) for the project by the Lahontan Regional Water Quality Control Board, the proposed design and supporting engineering analysis of the landfill's containment structures shall be reviewed and approved by the RWQCB to ensure the design complies with State regulations pursuant to California Code of Regulations, Title 27, Division 2. The applicant shall demonstrate to RWQCB satisfaction that the landfill liner and leachate collection system have been designed to preclude failure and will resist the maximum seismic shaking expected at the site based on risk assessment. Further, the design shall demonstrate that the final slopes will be stable under both static and dynamic conditions to protect public health and safety and prevent damage to the facility such that no significant impact to the environment will occur. The liner design, as proposed in Appendix B of the EIR, shall be modified or refined if necessary based on final engineering analysis and review by the RWQCB to ensure that the approved landfill design will mitigate impacts to a less than significant level.

The landfill containment structures shall be constructed as approved by the RWQCB. During on-going landfill construction, geologic mapping of rock and soil exposed in future excavations shall be completed. Information on rock type and any exposed folds, fractures and folds will be collected. Permanent cut slopes shall be observed by a qualified geologist to check for adverse bedding, joint patterns, or other geologic features that may impact the approved landfill design. Where necessary, the permanent cut slopes shall be constructed to ensure their stability. The

geologic maps will be included with the construction reports for each portion of the constructed landfill. The reports will be submitted to the LEA and Lahontan RWQCB.

This clarification to Mitigation Measure 4.1-1 has been corrected as errata to the Draft EIR. Please refer to Section 4.0 of this Final EIR document.

We trust that this collaborative effort adequately addresses the RWQCB's concerns.

Response 9-4

The Draft EIR provides a detailed analysis of the potential surface water quality impacts and the measures that will be implemented to prevent potential impacts to the sediment load of the Anaverde Creek. Pages 3-15 through 3-19 (including Figure 3-6) discuss the project's proposed Drainage Control and Surface Water Management System. Additionally, pages 4.3-14 and 4.3-15 and Figure 4.3-4 outline the project's Stormwater Management Plan and Erosion Control Measures to be implemented for stormwater runoff prior to discharge to the Anaverde Creek.

Lastly, Section 4.4 of the Draft EIR also addresses this issue. Mitigation Measure 4.4-3 states, "Prior to issuance of the landfill's Waste Discharge Requirements (WDRs), the project engineer shall finalize erosion and siltation control plans and other BMPs, as necessary to prevent graded and cleared areas from being eroded, resulting in the transport of sediment downstream to Anaverde Creek.

Please refer to Section 4.4 of the Draft EIR, specifically page 4.4-8 and Mitigation Measure 4.4-2 which do note that any streambed alterations will require review by the Lahontan RWQCB.

Response 9-5

As stated above in Response 9-1, current site policies and procedures include a Spill Prevention Control and Countermeasures (SPCC) plan which are actively followed and will continue to be part of the AVPL operating procedures for the expanded landfill.

Response 9-6

The comment is acknowledged. The error on page 4.3-12 has been corrected as errata to the Draft EIR. Please refer to Section 4.0 of this Final EIR document.

Response 9-7

The comment is acknowledged. Additionally, please refer to Response 9-3 above.

Letter No. 10



Arnold
Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

January 30, 2006

Richard Kite
City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550

Subject: Antelope Valley Public Landfill Expansion
SCH#: 1990010988

Dear Richard Kite:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 27, 2006, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible 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. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

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 the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

10-1

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Letter No. 10,
Continued**

**Document Details Report
State Clearinghouse Data Base**

SCH# 1990010988
Project Title Antelope Valley Public Landfill Expansion
Lead Agency Palmdale, City of

Type EIR Draft EIR
Description The applicant is applying for certain modifications to the aforementioned CUP issued by Los Angeles County. The primary modifications sought are: 1) to enlarge the approved 114-acre refuse footprint by approximately 11 acres in order to reconfigure the two landfills into one contiguous disposal area and increase landfill capacity by approximately 14 million cubic yards; 2) update the overall area of the facility to 185 acres (adding 5 acres of ancillary facilities and other landfill property to the existing 180-acre area; 3) modify other certain physical and operational aspects of the landfill; and 4) obtain a single Conditional Use Permit entitlement by the City of Palmdale for the entire facility.

Lead Agency Contact

Name Richard Kite
Agency City of Palmdale
Phone (661) 267-5200
email
Address 38250 Sierra Highway
City Palmdale
Fax
State CA **Zip** 93550

Project Location

County Los Angeles
City Palmdale
Region
Cross Streets Tierra Subida / City Ranch Road
Parcel No. 3004-013-009, 010, 011
Township 6N **Range** 12W **Section** 33 **Base** SBBM

Proximity to:

Highways SR-14
Airports
Railways
Waterways Anaverde Creek, California Aqueduct
Schools Palmdale School District; Various
Land Use The subject site is uninhabited land either used or permitted for solid waste disposal. Antelope Valley Public Landfill I consists of approximately 65 acres on the eastern portion of the site with 65-acres approved for landfill operations under Solid Waste Facilities Permit (SWFP) No. 19-AA-0009. Of these 65 acres, 57 acres are approved for disposal of refuse under the SWFP Permit. The remaining 7 acres is used for offices and hauling company operations ancillary to the approved landfill. The landfill has served the Antelope Valley since the 1950s and has a remaining life of approximately 2 years. Immediately adjacent and to the west is a 98-acre area comprising the Antelope Valley Public Landfill II, previously located in the unincorporated portion of the County and annexed into the City of Palmdale as of November 21, 2003. A Conditional Use Permit (CUP) for Landfill II was granted by the Regional Planning Commission, County of Los Angeles on April 8, 1992. An amendment to the CUP was approved on December 1, 1993. This landfill was issued SWFP No. 19-AA-5624 and has not been constructed. The site has a General Plan Land Use designation of PF-Landfill (Public Facility Landfill) and is zoned PF (Public Facility).

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Landuse; Noise; Public Services; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Note: Blanks in data fields result from insufficient information provided by lead agency.

**Letter No. 10,
Continued**

**Document Details Report
State Clearinghouse Data Base**

Reviewing Agencies Resources Agency; Regional Water Quality Control Bd., Region 6 (Victorville); Department of Parks and Recreation; Native American Heritage Commission; Integrated Waste Management Board; Department of Health Services; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Water Resources; California Highway Patrol; Caltrans, District 7

Date Received 12/14/2005 **Start of Review** 12/14/2005 **End of Review** 01/27/2006

Note: Blanks in data fields result from insufficient information provided by lead agency.

Response to Letter No. 10
State of California, Governor's Office of Planning and Research,
State Clearinghouse and Planning Unit – January 30, 2006

Response 10-1

The comment is acknowledged and will be forwarded to the decision makers for their review and consideration.

2.2 VERBAL COMMENTS

2.2.1 INTRODUCTION

The response letter on the following page was prepared by Waste Management in response to the following verbal comments by Jack and Rose O'Conner on some of the operational elements of the existing landfill.

- Noise from the maintenance facility
- Third party washing of trucks / Sundays at 7:00 AM
- Antelope Valley Environmental Collection Center (AVECC) sign
- AVECC semi-annual operations with uninformed personnel

The comments were discussed with Waste Management at a meeting on January 4, 2006. Upon receipt of the comments, Waste Management in discussions with the City of Palmdale, prepared and submitted the response letter on the following page to the O'Connors addressing their issues/concerns.

Although the comments specifically pertain to the existing landfill operations, because the meeting occurred during the 45-day public review period and these operations would continue with the proposed expansion CUP, the same measures that are currently being implemented to address the concerns will continue to be carried out through the expansion operations. As such, the City determined it was appropriate to include the response letter in this Response to Comments Final EIR document.

Response to Verbal Comments



**WASTE MANAGEMENT
OF ANTELOPE VALLEY**

P.O. Box 4040
Palmdale, CA 93590-4040
(661) 947-7197
(661) 223-3446 Fax

January 11, 2006

Jack & Rose O’Conner
37502 10th St W
Palmdale, Ca 93551-7702

RE: Jan. 4th 2006 Meeting

Dear Mr. & Mrs. O’Conner,

Thank you for meeting with us at the City of Palmdale to discuss your concerns and to open the line of communication amongst our neighbors. The meeting was a good step in the right direction and immediately following the meeting, Jim Merritt and I took a tour of your neighborhood. We realize the importance of the issues that were discussed in the meeting and have summarized them as follows:

- Noise from the maintenance facility
- Third party washing of trucks / Sundays at 7:00 AM
- Antelope Valley Environmental Collection Center (AVECC) sign
- AVECC semi-annual operations with uniformed personnel

We are pleased that we were able to resolve the first two items the same day we met:

- Our new Maintenance Manager was notified of the noise concern immediately after our meeting and an immediate solution was found. As you may have already noticed, a change in procedures is now in place to service trucks from the north side bays and only open the South-facing doors slightly as required for air circulation.
- I am also happy to report that the third party truck washing has been rescheduled to begin at 10:00 AM instead of the previous 7:00 AM start time.

The Antelope Valley Environmental Collection Center sign is a City approved identification banner for the facility, which must remain. However, because of your concern, we will soon be approaching the City with plans to install additional landscape screening which will border the Southeastern exposure of the facility.

As we discussed, AVECC semi-monthly operations require uniformed personnel under OSHA rules. Because of the concerns you raised, the operations will receive additional screening upon City approval of proposed landscape enhancements along the Southeastern exposure of the facility.

From everyday collection to environmental protection, Think Green® Think Waste Management.

Printed on 100% post-consumer recycled paper.

Response to Verbal Comments

Jack & Rose O'Conner
Page 2
January 11, 2006

Waste Management is proud of the operations that are conducted on a daily basis and the impeccable safety and environmental compliance record at its Palmdale facility. We strive to be a good corporate citizen and neighbor by implementing procedures that minimize any impact on the surrounding community.

We invite continued open communication and encourage you to contact me, at your convenience, to arrange a tour of our facilities for a better understanding of what we do and how we operate. My direct line contact number is (661) 223-3429.

Thank you again for your suggestions as we work together to maintain our good neighbor reputation.

Sincerely,


Chris Fall
Public Sector Services Manager

Cc: Donna Plummer, City of Palmdale
Jim Merritt, Waste Management

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3.0 MAY 2010 AMENDMENT TO THE DRAFT EIR COMMENT LETTERS AND RESPONSES

3.1 WRITTEN COMMENTS/RESPONSES

3.1.1 INTRODUCTION

This section provides responses to the written comments made on the Antelope Valley Public Landfill (AVPL) Amendment to the Draft EIR during the OPR published public review period of May 24, 2010 to July 7, 2010. The City of Palmdale accepted comment letters through August 5, 2010. The comment letters received on the May 2010 Amendment to the Draft EIR are numbered in continuation of the December 2005 Draft EIR comment letters. They are listed below, and are included in this section along with the formal responses prepared for the comments. To assist in referencing comments and responses, each specific comment is numbered and refers to a statement or paragraph in the corresponding letter. Where changes to the Amendment to the Draft EIR text result from response to comments, those changes are included in the response and demarcated with revision marks (underline for new text, strike-out for deleted text). Comments which present opinions about the project or which raise issues not directly related to the substance of the Amendment to the Draft EIR are noted without a detailed response. Comment-initiated revisions/clarifications to the EIR text are also provided and are demarcated with revision marks in Section 4.0, Changes to the December 2005 Draft EIR and May 2010 Amendment to the Draft EIR of this document.

3.1.2 LIST OF COMMENTERS

The comment letters received on the May 2010 Amendment to the Draft EIR are listed below (#11-18). The comment letters are numbered in continuation of the December 2005 Draft EIR comment letters. The paragraphs in the letters have been numbered and are referred to in the responses that directly follow the comment letter.

Letter	Agency/Signatory	Date
#11	Department of Resources Recycling and Recovery Raymond M. Seamans	June 10, 2010
#12	California Clean Energy Committee Eugene S. Wilson	July 3, 2010
#13	California Regional Water Quality Control Board, Lahontan Region Jan M. Zimmerman	July 7, 2010
#14	County of Los Angeles, Department of Public Works Pat Proano	July 7, 2010

#15	State Clearinghouse and Planning Unit Scott Morgan	July 8, 2010
#16	County of Los Angeles, Department of Public Works Pat Proano	July 15, 2010
#17	County of Los Angeles, Public Health Gerry Villalobos	August 5, 2010
#18	County of Los Angeles, Fire Department John R. Todd	August 11, 2010

The letter comments and responses follow.

Letter No. 11

Natural Resources Agency

Arnold Schwarzenegger, Governor



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

801 K STREET, MS 19-01, SACRAMENTO, CALIFORNIA 95814 • (916) 322-4027 • WWW.CALRECYCLE.CA.GOV

June 10, 2010

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RECEIVED
JUN 14 2010
STATE CLEARING HOUSE

Mr. Richard Kite, Assistant Director of Planning
City of Palmdale
Planning Department
38250 Sierra Highway
Palmdale, CA 93550

Subject: SCH No. 1990010988 – Amended Draft Environmental Impact Report for the Antelope Valley Public Landfill I & II, Solid Waste Information System No. 19-AR-0009, Los Angeles County

Dear Mr. Kite:

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

11-1

Department staff has reviewed the environmental document cited above and, at this time, have no new or additional comments or suggestions at this time. Department staff's understanding is that this amended environmental document is limited to offering additional analysis of traffic circulation and improvements and analysis of greenhouse gas emissions and climate change.

11-2

The specific entitlements, tonnage, hours of operation, traffic count, peak elevations etcetera remain the same as in the Draft Environmental Impact Report circulated in December 2005. Please refer to our letter of January 12, 2006, for comments on the proposed project.

11-3

Department staff thanks the Lead Agency for the opportunity to review and comment on this Amended Draft Environmental Impact Report and hopes that this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process.

11-4

Since there will be significant impacts resulting for the proposed project, Department staff request that a copy of the Statement of Overriding Considerations be forwarded along with the findings as required by 14CCR Section 15091 and any related resolution(s) adopted by the decision making body regarding this proposed project.

11-5

Department staff requests *hard copies* (paper, not electronic) of any subsequent environmental documents including, the Final Environmental Impact Report, the Report of Facility Information/Joint Technical Document, copies of public notices and any Notices of Determination for this project.

♻️
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**Letter No. 11,
Continued**

Amended DEIR Antelope Valley Landfill I & II

June 10, 2010

11-6 Please refer to 14CCR, Section 15094(d) that states: “If the project requires discretionary approval from any state agency, the local lead agency shall also, within five working days of this approval, file a copy of the notice of determination with the Office of Planning and Research [State Clearinghouse].”

11-7 Department staff requests that the Lead Agency provide a copy of its responses to comments at least ten days before certifying the Final Environmental Impact Report. Refer to Public Resource Code, Section 21092.5(a).

11-8 If the document is certified during a public hearing, Department staff request ten days advance notice of this hearing. If the document is certified without a public hearing, Department staff requests ten days advance notification of the date of the certification and project approval by the decision-making body.

11-9 If you have any questions regarding these comments, please contact me at 916.341.6728 or e-mail me at raymond.seamans@calrecycle.ca.gov, or Martin Perez, the Permitting and LEA Support staff person for Los Angeles County, at 951.782-4194 or email at martin.perez@calrecycle.ca.gov.

Note: Please note that correspondence related to this letter and for staff of the Waste Compliance and Mitigation Program should continue to be sent to 1001 I Street, Sacramento, CA 95814. Correspondence specifically for the attention of the Director of CalRecycle should be sent to the address in the letterhead. It should also be noted that CalRecycle staff's email addresses have changed – firstname.lastname@calrecycle.ca.gov. Effective May 1, 2010, email sent to ciwmb.ca.gov will not be forwarded to the calrecycle.ca.gov address.

Sincerely,



Raymond M. Seamans
Waste Compliance and Mitigation Program
Permitting and LEA Support Division
Department of Resources Recycling and Recovery

cc: Martin Perez
Waste Compliance and Mitigation Program
Permitting and LEA Support Division
Department of Resources Recycling and Recovery

Susan Markie, Branch Manager
Waste Compliance and Mitigation Program
Permitting and LEA Support Division
Department of Resources Recycling and Recovery

Pete Oda, Supervisor
Department of Health Services
5050 Commerce Drive
Baldwin Park, CA 91706

Response to Letter No. 11
Department of Resources Recycling and Recovery – June 10, 2010

Response 11-1

The comment is acknowledged, but does not raise an issue regarding the environmental analysis contained in the Amendment to the Draft EIR; therefore, no response is warranted.

Response 11-2

Please refer to Response to Letter No. 4 in Section 2.0, pages 2-18 to 2-20 of this Final EIR for the responses to the January 12, 2006 comment letter.

Response 11-3

The comment is acknowledged, but does not raise an issue regarding the environmental analysis contained in the Amendment to the Draft EIR; therefore, no response is warranted.

Response 11-4

When available, a copy of the CEQA Findings of Fact and Statement of Overriding Considerations will be forwarded to the Department.

Response 11-5

When available, a hard copy of any subsequent environmental documents, including this Final EIR, will be provided to the Department.

Response 11-6

The comment is acknowledged, but does not raise an issue regarding the environmental analysis contained in the Amendment to the Draft EIR; therefore, no response is warranted.

Response 11-7

A copy of the responses to comments will be provided to the Department when available and at least ten days prior to the City's consideration for certification.

Response 11-8

A required notice will be provided to the Department when available.

Response 11-9

The comment is acknowledged, but does not raise an issue regarding the environmental analysis contained in the Amendment to the Draft EIR; therefore, no response is warranted.

Response to Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see Appendix A of this document)

The comment/protocol is acknowledged. Any future surveys will follow the Protocols for Surveying and Evaluating Impact to Special Status Native Plant Populations and Natural Communities.

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Letter No. 12

California Clean Energy Committee

July 3, 2010

VIA FACSIMILE AND FIRST-CLASS MAIL

Mr. Richard Kite
Assistant Director of Planning
City of Palmdale
38250 Sierra Highway
Palmdale, California 93550

Re: Comments on the Draft Environmental Impact Report
Antelope Valley Public Landfill CUP
SCH No. 1990010988

Dear Mr. Kite:

This letter will constitute comments by the California Clean Energy Committee on the Draft Environmental Impact Report on the Antelope Valley Public Landfill CUP (EIR). While these comments focus on some of the primary issues raised by the EIR, they do not constitute an exhaustive discussion of all issues. The comments in this letter are directed only at issues raised by the draft EIR.

The Committee is a California non-profit corporation which seeks to promote energy conservation, greenhouse gas reduction, and the development of clean-energy resources throughout California. It actively supports the application of the California Environmental Quality Act (CEQA) to energy conservation and related issues.

Over 50 individuals in the Palmdale area have joined the Committee's campaign to request that the EIR evaluate increased recycling and energy conservation as part of the expansion of the Antelope Valley Public Landfill. Many Palmdale residents are enthusiastic about recycling and consider it to be a sensible way to economize and to protect the environment.

The purpose of this letter is to bring to the city's attention a number of environmental considerations, permitting alternatives, and economic factors that provide cost-effective opportunities to protect the environment in connection with the landfill expansion. In particular, the Committee seeks to engage the full scope of technical resources available to the project applicant to produce a long-term project design that considerably extends

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Continued**

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the life of the landfill, increases recycling in the region, generates clean energy, and reduces impacts currently associated with the project.

The Committee requests that it be added to the list for all future notices regarding this matter. The Committee is available to discuss these comments or respond to questions.

A. Project Description

The Antelope Valley Public Landfill (AVPL) is a Class III sanitary landfill that operates on a 72 acre parcel located at 1200 West City Ranch Road in the City of Palmdale. This location is west of the Antelope Valley Freeway and north of Avenue "S." The draft EIR refers to the 72-acre landfill site as "Landfill 1."

The initial permit for Landfill 1 was issued by the County of Los Angeles in 1956. The City of Palmdale incorporated in 1962, and the AVPL was grandfathered into the city according to the draft EIR. (2-5.)

The EIR does not describe the permitting history of Landfill 1 with the City of Palmdale. And there is no reference to any prior environmental review for Landfill 1. Apparently there is no CUP for Landfill 1. However, the EIR does state that Landfill 1 operates under a Solid Waste Facility Permit (SWFP) permit issued by the California Integrated Waste Management Board (CIWMB).

12-2

The SWFP on Landfill 1 limits operations to a 65 acre property with 57 acres devoted to landfilling operations and approximately 7 acres devoted to ancillary operations. (2-5.) The maximum daily waste allowed for Landfill 1 is 1400 tons. A maximum of 434 trucks is permitted daily. The total permitted airspace for Landfill 1 is 7.4 million cubic yards. The SWFP allows the site to be open to the public from 8:00 a.m. to 4:45 p.m. (3.11.)

The EIR refers to a second area—called "Landfill 2"—which is incorrectly described as being situated "immediately" to the west. Landfill 2 apparently consists of a 98 acre parcel and a 10 acre parcel. It was located in the unincorporated area of Los Angeles County until November, 2003. On November 21, 2003, the City of Palmdale annexed the area where Landfill 2 is located. (1-2.)

The permitting history for Landfill 2 is also unclear. The EIR states that an application for permit was filed in 1984 with the County of Los Angeles to expand Landfill 1 by the addition of Landfill 2. This appears to be a misstatement since the County of Los Angeles would have had no land use jurisdiction over Landfill 1 which was then located within the City of Palmdale. (2-5.)

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Whatever the application was, the County of Los Angeles required an environmental impact report with respect to Landfill 2 at that time. This environmental impact report was not initially certified due to an earthquake fault under the site. After further studies the environmental impact report was finally certified in April, 1992, and the County issued a conditional use permit for Landfill 2. The following year a mitigated negative declaration was certified by the County connected with an increase in the permitted daily tonnage at Landfill 2 to 1800 tons.

12-3

According to the EIR, Waste Management, Inc. (WMI) purchased the "property" in 1999. (1-2.) WMI is a New York Stock Exchange listed company. WMI operates approximately 273 active landfill sites in North America and approximately 21,000 refuse collection and transfer vehicles. The company is headquartered in Houston, Texas.

The EIR is described as a supplement to the 1992 final environmental impact report and to the mitigated negative declaration certified in 1993 for Landfill 2. (2-6.) The EIR should proceed as a subsequent EIR, rather than as a supplemental EIR, due to the scope of the changes involved.

12-4

A supplement to the 1992 EIR would be an expansion of Landfill 2. However, the EIR describes the project as the expansion of Landfill 1 to include Landfill 2 and elsewhere as an 11 acre expansion of the combined landfills. The EIR should make clear what the original project was and what the new project is. To the extent that existing permitted conditions constitute the baseline, the EIR should clarify what permits on which landfills are being used for the baseline. The two landfills could not constitute a baseline for the CUP since the City of Palmdale has not issued a CUP on Landfill 1. The environmental baseline should be the existing physical conditions. (*Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310.)

12-5

The EIR should clarify the history of these landfills with the Local Enforcement Agency (LEA), which is the Los Angeles County Department of Public Health, and the CIWMB. It appears that both projects have at some time been issued a SWFP. Presumably a SWFP was issued for Landfill 2 in 1992 or 1993. The EIR does not indicate when a SWFP was issued for Landfill 1.

12-6

Errors also exist in the description of site conditions. The EIR states that Landfill 2 has not been constructed and is not in operation. However, a site inspection and satellite imagery reflect that Landfill 2 is currently in operation and further that the 11 acre parcel separating the two landfills has been graded, apparently without permit, and is currently

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- in use for ancillary operations. Staff at the landfill site estimate that Landfill 2 was put into operation around April, 2007.¹
- The EIR is in error regarding the relocation of the SCE transmission line. A site inspection reflects that the line is no longer present on the site. According to WMI staff, the line was relocated approximately 2 to 3 years ago.²
- 12-7**
- The EIR asserts that an 11 acre expansion would provide 12.8 million cubic yards of additional capacity bringing total capacity to 29.4 million cubic yards. This is not plausible since an increase of less than 10 percent in the waste footprint would not result in a site capacity increase of 77 percent.
- 12-8**
- The EIR states that the AVPL receives virtually all of the solid waste generated in the City of Palmdale. (3-1.) This appears to be in error. Green waste and recycled waste from the region are primarily hauled to the Lancaster landfill according to WMI staff.³ The hauling of waste from the local area to remote landfills should be discussed and quantified.
- 12-9**
- The population of Palmdale, Lancaster, Santa Clarita, and the unincorporated areas is expected to grow rapidly. The EIR should be corrected to use current population data from the 2008 SCAG Regional Transportation Plan, rather than using 2004 data.
- 12-10**
- The EIR incorrectly asserts that population growth is projected to be 3% per year for the incorporated cities. (3-7.) Table 3-1 of the EIR shows that population of Palmdale is expected to increase from 146,995 to 337,314. This is 131% over 25 years which constitutes an increase in excess of 5% per year. Both incorporated and unincorporated areas are expected to grow at 5% per year.
- 12-11**
- The current project clearly seeks to expand and consolidate the various permitted operations at AVPL. The EIR states that the project entails:
- 100% increase in the permitted intake of solid waste going from 1800 tons per day to 3600 tons per day.
 - 77% increase in the total permitted volume of the combined landfills going from 16.6 million to 29.4 million cubic yards.
 - Increasing the height of the landfill to 3200 MSL.

¹ Interview with Nicole Stetson, Landfill Manger, June 21, 2010.

² Interview with Nicole Stetson, Landfill Manger, June 21, 2010.

³ Interview with Nicole Stetson, Landfill Manger, June 21, 2010.

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- Constructing two desilting basins.
- Extending operating hours for receipt of waste to 8:00 p.m. and for ancillary operations to 10:00 p.m..
- Increasing the maximum daily number of trucks from 434 under current permit to 567 trucks per day.
- Adding undefined erosion protection along the north bank of Anaverde Creek.
- Revising the site entrance including construction of a frontage road to connect with City Ranch Road and creating a 4-way signalized intersection.
- Constructing an access road along the R-5 dedicated right-of-way.
- Constructing an additional truck scale.
- Relocating the SCE transmission lines.
- Installing a landfill liner, leachate collection and removal system, recycling drop-off center, drainage control, and groundwater monitoring system.

12-12

B. Current Public Policy on Energy Conservation

Every level of government has now expressly recognized the benefits that the general public derives from energy conservation and the development of renewable energy resources. And renewable energy enjoys broad public support. The High Desert will be a key area in California's development of renewable energy resources. The City of Palmdale has already proposed the Palmdale Hybrid Power Plant—a 570 megawatt electric generating facility that includes solar thermal.

In adopting its General Plan, the City of Palmdale recognized the importance of energy conservation and alternative energy resources. The Environmental Resources Element of the General Plan calls on the city to encourage energy conservation from all sectors of the community by promoting energy efficient processes and equipment and by promoting energy audits of existing structures. It calls on the citizens and local businesses to recycle to the extent possible. (ER-10.) The General Plan calls on the city to identify existing levels of energy use and potential conservation measures. (ER-18.) And it requires the city to support programs designed to reduce energy consumption and to utilize alternative energy sources. (ER-25.) The EIR should comply with the General Plan provisions on energy and recycling.

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On July 13, 2006, Governor Schwarzenegger approved the Bioenergy Action Plan for California. The stated policy objectives of the plan are as follows:

- Maximize the contributions of bioenergy toward achieving the state's petroleum reduction, climate change, renewable energy, and environmental goals.
- Establish California as a market leader in technology innovation, sustainable biomass development, and market development for bio-based products.
- Coordinate research, development, demonstration, and commercialization efforts across federal and state agencies.
- Align existing regulatory requirements to encourage production and use of California's biomass resources.
- Facilitate market entry for new applications of bioenergy including electricity, bio-gas, and biofuels.

California Senate Bill 1078 established the Renewable Portfolio Standard (RPS) for electricity supply. It requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide 20 percent of their supply from renewable resources by 2017. Senate Bill 107 advanced the target date for meeting the 20% level to 2010 and required renewables to be increased by 1% per year. To date the utilities have not been able to achieve the target levels.

The U.S. EPA has established a Landfill Methane Outreach Program that is intended to encourage the recovery and use of landfill gas as an energy resource. The Landfill Methane Outreach Program provides communities access to a network of industry experts and practitioners as well as various technical and marketing resources that can help with development of landfill energy projects.

C. Landfill Gas-to-Energy Technology

12-13

There are a number of different technologies now available for recovering energy from the municipal waste stream. Each accommodates differing site conditions. Landfill gas recovery is one technology. It typically involves using recovered landfill gas to drive a turbine generating electricity. According to the EPA, there are now at least 485 operational landfill gas projects in 44 states providing electricity for over 889,000 homes.

The Sanitation Districts of Los Angeles, for example, operate a landfill gas recovery system at the Palos Verdes Landfill. Recovered landfill gas is used to fire boilers that pro-

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duce steam which drives a turbine/generator. Palos Verdes produces 2.4 MW which is sufficient to power over 3,000 homes. The Districts use the electricity on site to power a water reclamation facility and put power on the Southern California Edison grid.

The Sanitation Districts also operate the Puente Hills Landfill where a portion of the landfill gas is purified using a membrane technology, which is ideal for small quantities of gas, and pressurized to produce compressed natural gas (CNG). The system operates outdoors and unattended. The CNG is made available via a conventional gasoline pump and is currently being used to fuel pickup trucks, cars, and heavy equipment. The total cost of the CNG facility was approximately \$1 million, and the cost of the fuel produced is equivalent to \$0.50 per gallon. The District is now working with the South Coast Air Quality Management District to use the CNG in heavy-duty water trucks and refuse transfer vehicles.

CNG is a cleaner burning fuel with lower carbon content. Using CNG derived from landfill gas reduces emissions, avoids the flaring of excess gas, conserves energy, and provides a low cost fuel source.

The Sanitation Districts also operate a 250 kW microturbine fueled by digester gas in Lancaster. This facility was funded in part through assistance from the California Public Utilities Commission. The savings in electrical purchases are expected to pay for the facility in 3 years. The Sanitation Districts have also implemented a demand side resource management program to conserve energy in administrative offices and other facilities.

D. Municipal Solid Waste Power Plants

The solid waste power plant is another technology for recovering energy from the municipal waste stream. These plants typically convert waste to energy by incinerating the waste or gasifying the waste using pyrolysis or thermal gasification.

12-14

There are a number of established solid waste power plants in California. The Stanislaus Resource Recovery Facility, located in Modesto, processes an average of 800 tons of municipal solid waste daily. The Stanislaus facility reduces the volume of solid waste by approximately 90% and recovers and recycles 450 tons of ferrous metal each month. The emissions control system exceeds EPA limits. The facility is recognized by the State of California as eligible for the Renewable Portfolio Standard. It produces enough electricity to supply 18,000 homes with power. For the amount of energy generated, the CO₂ emissions of the plant are significantly lower than what coal, petroleum, or natural gas would produce. The facility has been in operation since 1989.

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July 3, 2010
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At the present time, numerous California jurisdictions are considering solid waste power plants. The County of Santa Barbara recently completed an evaluation of firms providing waste conversion technologies that resulted in the issuance of an RFP to eight firms. Each of the selected firms has a proven track record for using this technology and is capable of scaling facilities to 220,000 tons per year, diverting at least 60% by weight of the municipal waste received, conforming to California environmental standards, and providing private financing.

12-15

E. Methane Fermentation Technology

Methane fermentation is a third type of technology that captures energy. Methane fermentation systems take advantage of the substantial quantities of organic waste in the municipal waste stream. The California Integrated Waste Management Board (CIWMB) reported in March, 2008, that on average each Californian produces 2.5 tons (2.2 MT) of municipal solid waste (MSW) annually.⁴ Roughly 40-60 percent of the waste stream is organic. According to the EPA yard trimmings and food scraps constitute 24% of the municipal waste stream.

The CIWMB reports that the energy potential represented by the organic waste landfilled in California is more than 15,000 GWh/y of electricity. This is equivalent to 1,700 megawatts of power or sufficient energy to power 1.7 million homes.⁵

The CIWMB states that anaerobic digestion of municipal solid waste can be used to reduce the amount of material being landfilled, stabilize organic material, and to recover energy. The following graphic is one company's conceptual chart explaining the ecological cycle and the public health benefits of anaerobic digestion.

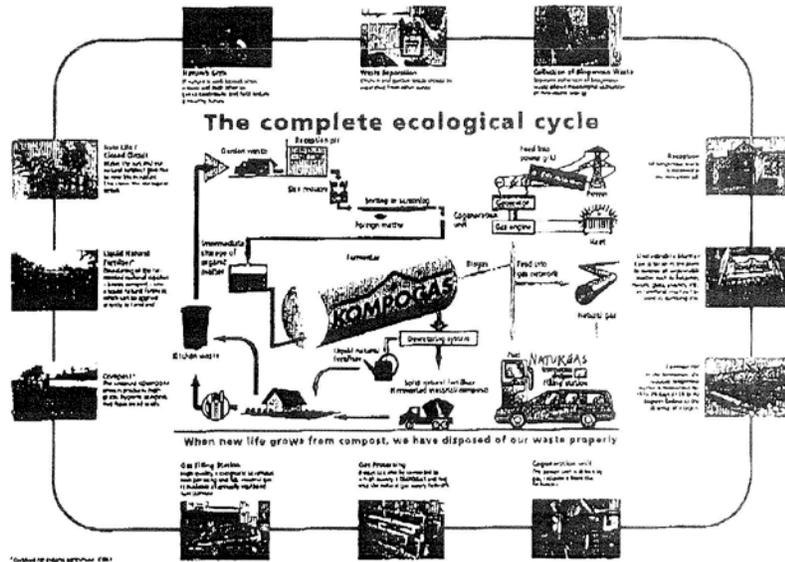
⁴ CIWMB states that this represents approximately a one-ton increase per capita since 1993.

⁵ Appendix 4, p. 4.

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F. Energy Impacts

The Initial Study concludes that the project will have no impact on energy.

12-16

The issue was not analyzed in the previously certified EIR. Although the refuse footprint will be increased by 11 acres with the proposed CUP, the daily intake of refuse will not increase over what was approved by the County CUP. Thus, energy demands to transport refuse would not be increased over what's currently approved. In addition, as indicated above (B. Air, 1. Emissions, Page 14), since the previous approval, a publicly accessible Liquefied Natural Gas (LNG) fueling station has been constructed on the site. This station is part of a regional plan to replace diesel-powered vehicles with cleaner burning alternative-fuel vehicles. A program to convert refuse trucks over to LNG is in progress. Therefore, no impacts are anticipated.

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(EIR, App. A-1.)

- 12-16
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- However, the project does have potentially significant energy impacts, and LNG use does not save energy over diesel fuel to any significant degree. The benefit of LNG is that it produces fewer emissions.

- 12-17
- The EIR states, "The project also proposes to change the 1993 CUP approved daily disposal volume of 1,800 tons per day (tpd) to 3,600 tpd." (4.2-10.) This is a 100% increase in the daily disposal volume. The increased daily tonnage would result in a considerable increase in energy used for hauling refuse to the site and landfilling larger quantities of municipal solid waste.

- 12-18
- The EIR does not report the baseline average daily vehicle count for the landfill. However, it indicates an increase in the maximum number of daily trucks from 434 under the current conditional use permit to 567. This constitutes a significant increase in the daily count. Energy is required to manufacture and fuel trucks to haul the refuse to the site. The EIR indicates a variety of increases in truck traffic to the site including an additional 270 daily trips, a 54% increase in volume, a 20% increase in daily traffic, and an increase in daily disposal volume. (4.2-11.)

- 12-19
- The maximum waste volume permitted under the two existing SWFPs is 16.6 million cubic yards. Table 3-2 shows a 12.8 million cubic yard increase in landfill waste volume over that amount. This is a 77% increase in the volume of landfilled material and consequently a potentially significant energy impact.

- 12-20
- More energy is required to manufacture and fuel heavy equipment to excavate new landfill cells, to position refuse, to compact it, to excavate and import daily cover, to apply the cover to the waste, and for related activities. (4.2-12.) Considerable additional energy, primarily in the form of diesel fuel and LNG, will be required to haul and landfill an additional 12.8 million cubic yards of waste. Fuel requirements should be quantified.

- The extraction of crude oil, refining it into diesel fuel, and transporting it to the landfill site for use in trucks and heavy equipment requires considerable energy and creates a cumulative impact on the environment.

- 12-21
- Energy will be required for a new signalized intersection, an additional truck scale, additional staffing, and extended hours of operation which may include operation after dark given the extended hours. The energy efficiency of the buildings on site should be evaluated.

- 12-22
- Extending the landfill life increases landfill gas production during the life of the landfill and after closure. (4.2-11.) The project proposes to flare the additional landfill gas that is

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expected to be produced by the expanded landfill. This is a waste of the energy that is latent in the waste stream. The EIR should evaluate and implement all feasible ways to recover energy from the waste stream. The waste stream is a clean-energy resource. The landfilling of waste organics in particular constitutes a waste of energy. According to the EPA,

Creative use of landfill gas (LFG) includes heating greenhouses, producing electricity and heat in cogeneration applications, firing brick kilns, supplying high-Btu pipeline-quality gas, fueling garbage trucks, and providing fuel to chemical and automobile manufacturing. Projects range from small-scale community-driven initiatives to multi-million-dollar private investments

As discussed above, there are a variety of established technologies that recover energy from organic material as well as other material in the waste stream. The U.S. Environmental Protection Agency has classified the Antelope Valley Public Landfill as a Candidate Landfill for a landfill gas use project.

12-23

Feasible energy recovery exceeds the amount of methane that is recovered by the LFG system which is intended only to capture an unintended byproduct of landfilling. Bio-reactor technology and other energy recovery systems optimize energy recovery. Energy conservation implies maximizing the amount of clean energy that can be feasibly recovered from the landfill. The possibility that the project impacts a valuable clean-energy resource should be carefully evaluated.

12-24

The EIR should calculate the estimated energy potential represented by the waste-in-place along with the additional waste that will be landfilled under the project. The EIR only reports that in 2006 the landfill was producing 896 CFM based upon a measured input of 672 CFM to the LFG disposal system. The EPA estimates that 300 cubic feet per minute (CFM) of gas is available for utilization for every million tons of waste-in-place. The heat content of methane is 1,012 Btu/scf. The project proposes to landfill an additional 12.8 million cubic yards of waste.

12-25

This Antelope Valley Public Landfill is similar in size to the Spadra Landfill in the City of Pomona, which is a 128 acre site. A materials recovery program instituted at Spadra recovered 400,000 tons of greenwaste, 475,000 tons of asphalt, 467 tons of metallic discards, 380 tons of tires, and 55,000 gallons of oil. In addition, a Rankine Cycle Steam Power Plan installed at Spadra produces 5 MW net of electric power which is sold to Southern California Edison in addition to meeting on-site needs. The electrical energy produced by Spadra is sufficient to power 7,000 homes.

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12-26

Apart from the energy inherent in the waste stream, the U.S. EPA concludes that recycling materials conserves energy. It typically requires less energy to recycle materials than to extract virgin raw materials. In order to reduce energy impacts, the EIR should evaluate the potential energy savings from recycling, as opposed to landfilling.

12-27

The decision to increase the quantity of material that is landfilled at the site will shorten the expected lifetime of the landfill. Once the site reaches capacity, a new landfill will need to be constructed and a spectrum of further environmental impacts will result. Increasing energy requirements to haul materials to a more distant landfill site is one of the likely impacts. The decision to increase the maximum daily tonnage to 3600 tpd will exhaust the landfill capacity more rapidly and will increase the impacts connected with siting a new landfill. The EIR should evaluate these impacts and consider feasible mitigation to reduce the quantity of material landfilled.

12-28

G. Climate Change Impacts

The EIR concludes that four sources of increased GHG emissions are associated with the project: (1) the larger number of vehicles associated with the increase in the daily disposal limit to 3613 tons per day, (2) the increase in haul trucks to take away sorted recyclables, (3) increased heavy equipment to spread, compact and cover residual refuse, and (4) the GHGs present in increased landfill gas emissions.

12-29

In order to mitigate the cumulative impact to GHG emissions, the EIR should require that before the conditional use permit is issued, the following steps be taken--

- Hauling trucks converted to natural gas,
- Idling of heavy equipment and trucks reduced,
- Landfill equipment meeting current California emission standards,
- Diesel equipment using biodiesel fuel
- Contract with third-party haulers requiring compliance with same standards
- Recovery of landfill gas for fueling vehicles and equipment
- Diversion of all organic material from the land fill
- A complete and enforceable GHG reduction plan

Additional recycling will reduce GHG emissions and increased recycling should be included in the EIR as mitigation for GHG impacts.

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H. Air Quality Impacts

12-30

The data on air quality should be made current and internally consistent. The EIR notes that ozone levels continue to exceed the California and national hourly standards and that the California PM-10 standard is also exceeded. However, the analysis contradicts itself going on to state that "Antelope Valley can accommodate a reasonable level of growth without threatening the continued attainment of standards such as nitrogen oxides or carbon monoxide." And the EIR contradicts itself again stating, "Such growth may, however, exacerbate existing violations of standards for ozone and particulates." (4.2-4.) Then the analysis states that the Antelope Valley is in non-attainment for ozone under the CAA and the CCAA but contradicts itself by saying the Antelope Valley will be in attainment of the NAAQS for ozone by 2007.

12-31

The EIR concludes that the greater level of on-road emissions connected with the project will increase NOx emissions from diesel exhaust and that the project will result in a cumulatively significant and unavoidable impact on air quality. Table 4.2-5 shows an increase of 123 pounds-per-day in NOx emissions which is cumulatively significant.

12-32

Additional mitigation is feasible. All diesel equipment and hauling trucks should be converted to LNG or CNG in the near term in order to mitigate air quality and GHG impacts. When the EIR was written, there was a LNG fueling facility at the landfill. The EIR should confirm whether that facility still exists and what the current number of vehicles using CNG or LNG is and quantify the emission reductions.

12-33

Air quality impacts can also be mitigated by discontinuing the flaring of landfill gas and instead cleaning the landfill gas and using it to fuel equipment and hauling trucks. Conversion to clean-burning natural gas would mitigate the emission of criteria pollutants, reduce GHG emissions because methane is a low-carbon fuel. This is particularly appropriate given that the fuel recovered at the landfill is on-site and no transmission or delivery impacts are associated with taking advantage of it. The mitigation should include evaluation of tools to maximize the landfill gas recovery including bioreactor technology.

12-34

The EIR should also consider whether the entrance and weighing facilities will sufficiently avoid extended wait times for trucks and vehicles accessing the facility at peak hours. Extended waiting time increases emissions and energy use. Similarly, the statement in the EIR that equipment is not operating at full capacity/power should be clarified. This could mean that operators are not applying the necessary power to their equipment to move material or that they are idling their equipment when it should be off or that WMI has personnel on the site who are idle during working hours. To qualify as mitigation, this statement should be quantified.

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I. Resource Exhaustion and Extraction Impacts

12-35

The primary purpose of the project is to meet the increasing public demand for refuse disposal. The EIR should evaluate the different ways of meeting public demand for refuse disposal capacity and the relative environmental merits of each. Landfilling is far from a perfect solution.

12-36

Landfilling is the most common method and has typically been viewed as the most cost-effective. However, landfilling entails significant environmental impacts including the loss of valuable resources that are contained in the waste stream such as energy, compost, paper, and ferrous metals. Once landfilled, materials are rendered unavailable for re-use or recycling on a cost-effective basis. To meet consumer demand for new products, additional resources must be extracted from the environment with consequent impacts. For example, according to the EPA, paper comprises approximately 35% of the municipal solid waste. Millions of pounds of paper that could be recycled is sent to landfills every year. The direct result is greater impacts on forests that are destroyed for use as paper and lost as carbon sinks. According to the U.S. EPA,

By substituting recovered scrap materials for the use of trees, metal ores, minerals, oil, and other virgin materials, recycling reduces the pressure to expand forestry and mining production, which can be environmentally damaging. For example, recycling one ton of paper saves the equivalent of 17 trees and 7,000 gallons of water.⁶

12-37

The EIR should contain a careful analysis of the content of the waste stream indicating quantities of materials such as construction debris, tires, organic material, plastics, metal, glass, paper, and hazardous material. Recent studies in nearby regions have concluded that 50% of the existing waste stream is comprised of traditional recycling materials and that significant recycling opportunities exist.

12-38

The EIR should contain a complete discussion of current recycling activities in the region. There is a reference to the addition of a recycling drop-off center, but no details have been provided.

12-39

A site inspection on June 21, 2010, and interview with WMI staff revealed little in the way of recycling at the site. AVPL accepts concrete and asphalt materials as well as green-waste and wood for recycling. There is a posted schedule of charges for certain items

⁶ App. 19.

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which are diverted to a separate recycling area. All other recyclables are directed to Lancaster.⁷

12-40

Similarly, interviews with residents from Palmdale and surrounding areas reflected difficulties and frustrations with recycling. In particular residents reported that in some areas they are unable to obtain recycling containers (apparently outside the City of Palmdale). One county resident reported that she was only provided with a trash container and no recycle container and no greenwaste container. Other residents reported that recycling facilities had either been reduced or were unavailable including facilities that were previously available at the Acton Community Center.⁸ The AVPL site posted to prohibit scavenging which effectively limits potential reuse. Clearly additional recycling as mitigation is feasible.

12-41

The landfill expansion should be preceded by careful consideration of feasible mitigation for the impacts through more robust recycling programs. The EIR should evaluate the extent to which landfilling waste impacts the physical environment by wasting resources and necessitating the acquisition of replacement raw materials from the physical environment including energy resources.

12-42

Enhanced recycling or an upgraded on-site materials recovery facility should be carefully considered. A recycling center should be located where it will make recycling convenient for landfill users. The proposed side-road configuration is not adequate to encourage recycling. Public education is a critical component of such mitigation. Source reduction programs should also be evaluated as a mitigation tool for the impacts of the project.

12-43

Financial incentives for recycling should be adopted and promoted. The recycling area should be located before users reach the scale allowing users to lighten their loads and reduce dump fees by recycling before weigh in. The recycling center should offer buy-back, and dump fees and trash hauling practices should encourage recycling. Consideration should be given to the efficiencies of using a competing franchise for the recycling center.

12-44

J. Landfill Exhaustion Impacts
The numbers in the EIR are outdated and apparently were generated when the EIR was originally drafted in 2005. (2-1.) The EIR projects that the AVPL will reach capacity in 1.5 years or in 2007. (2-5.) Given that the landfill is still in operation at the present time.

⁷ Interview with Nicole Stetson, Landfill Manger, June 21, 2010.
⁸ Interviews with residents, June 21, 2010.

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second half of 2010, either these numbers are not accurate or the landfill is being expanded beyond permitted capacity. These issues need to be resolved including an agency determination of whether or not the landfill is now operating beyond permitted capacity, information on why capacity was not reached in 2007 as projected, and a reliable statement of the expected lifetime of the facility as it is now configured.

- 12-45

The draft EIR concludes that the project will provide an additional 12.8 million cubic yards of airspace for landfiling beyond current permitted levels. (3-11.) It states that this additional capacity is expected to extend the life of the landfill by 16 to 17 years. These numbers also should be updated taking into account the remaining capacity at this time, updated population projections, and projected daily waste trends.

The direct impact of increasing the permitted daily intake of solid waste from 1800 tons to 3600 tons per day is to allow for increased landfiling and to exhaust the available landfill capacity earlier.

- 12-46

The General Plan reflects that other landfills in the region are starting to reach capacity and are influencing dump activities at the AVPL. (PS-43.) As designed, the project would rapidly exhaust the expanded landfill capacity. The necessary consequence is to impose the difficult and costly task of siting a new landfill on government and the public—a project that will take many years to complete.

- 12-47

Any new potential landfill site will inevitably be more remote and hauling to it will involve greater emissions and new environmental impacts. It is possible that it will involve hauling waste out of the region. (4.2-12.) Land itself is a scarce resource, especially in urban areas. Once land has been devoted to a landfill it becomes permanently unavailable for other productive uses.

- 12-48

These impacts should be evaluated in the EIR. The financial incentives to the public and the franchisee should account for these impacts. The EIR should implement mitigation insuring the WMI has a financial incentive to extend the life of the landfill to the greatest extent possible.

- 12-49

The life of the landfill can be considerably extended and the impacts reduce by aggressive recycling and materials and energy recovery. Unchecked expansion of the permitted daily tonnage of waste to be landfilled is not an environmentally sound policy.

- 12-50

In light of the many unaccounted external costs of siting a new landfill, careful consideration should be given to whether the economic resources that this project would devote to landfiling can be feasibly reallocated to provide reduction, reuse and recycling so as to maximize the life of the AVPL. The EIR should consider the fee structure and franchise fees as a potential tools to encourage recycling and to reduce impacts.

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Additionally, the EIR should clarify how the total daily tonnage can be projected to peak at 5,548 for waste and recyclables without exceeding the proposed daily limit of 3600 tons of waste alone. The project appears to be in conflict with the proposed permit.

12-51

K. Water Quality Impacts

The EIR should consider the nature of the downstream water bodies including Lake Palmdale.

According to WMI staff, the surface drainage of the landfill is via storm water points into Anaverde Creek. Anaverde Creek empties into Lake Palmdale. The EIR should consider the long term effect of erosion on the site and whether eventually the site will erode resulting in contamination in Anaverde Creek.

12-52

The liner currently being installed is a 2" clay base, followed by a 60 mil HDPE layer, followed by the leachate recovery system which consists of gravel and perforated piping, followed by an operations layer consisting of two feet of dirt.⁹

12-53

Efforts to keep hazardous wastes out of the landfill include signage, a form signed by people dumping, and WMI personnel who randomly check loads and watch the dumping of materials for hazardous wastes. There is a residential hazardous wastes disposal center on site which takes materials such as used oil and paint which are subsequently shipped off-site by a contractor.¹⁰

12-54

L. Alternatives Analysis

The EIR considers the following alternatives:

- Making no changes in landfill operations (Alternative A)
- Omitting the 93 foot vertical expansion from the project (Alternative B)
- Omitting the vertical expansion and the 36-acre footprint expansion from the project (Alternative C)
- Omitting the vertical expansion and the 36-acre footprint expansion and adding a transfer station on closure (Alternative D)

⁹ Interview with Nicole Stetson, Landfill Manger, June 21, 2010.

¹⁰ Interview with Nicole Stetson, Landfill Manger, June 21, 2010.

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With the exception of the no-project alternative, none of these alternatives reduces the significant impacts of the project. The EIR should propose feasible alternatives that are environmentally-superior to the project. Simply reducing the size of the landfill, regardless of whether it is by reducing the vertical expansion or the footprint expansion or both, does little or nothing other than to cause the landfill to hold less material and to be closed sooner. As the EIR points out, this simply requires the diversion of refuse to another location earlier and entails increased energy, GHG, and air quality impacts. The alternatives would not reduce the potentially significant impacts of the project.

Potential alternatives that could feasibly reduce the impacts include a solid waste conversion facility or anaerobic digestion facility which would make the facility into a net generator of energy. This is the case with the Stanislaus Resource Recovery Facility, which processes 800 tons of municipal solid waste daily. Stanislaus reduces the volume of solid waste by 90% which reduces the impacts connected with future expansion of landfill capacity.

A second alternative would be a "Mitigated Alternative." This alternative is derived from an EIR done by Environmental Science Associates (ESA) for the Redwood Landfill Solid Waste Facilities Permit Revision in July, 2005. This alternative was deemed to be the environmentally-superior alternative in that EIR. The concept has fundamental merit and could be modified to suit the AVPL site. Paraphrasing ESA, the Mitigated Alternative is described as follows:

12-55

The Antelope Valley Public Landfill (AVPL) would shift its emphasis from waste disposal to material and energy recovery. Instead of placing emphasis on increasing waste disposal capacity, AVPL would develop processes and methods aimed at increasing diversion of materials from landfill, and increasing energy production at the site. This would result in several benefits, including preservation of landfill capacity; increasing diversion and reducing land-filling of wastes; reducing the need for certain project mitigation measures described in the analysis; providing justification for Overriding Considerations for significant unavoidable impacts of the project; helping to counterbalance or avoid altogether the significant unavoidable effects of the proposed project; maximizing consistency with County Integrated Waste Management Plan policies and County energy policies; and providing long-term protection of the environment in accordance with California Public Resources Code (PRC) § 440121. These measures would include the following:

- Instituting a construction and demolition debris recycling system;
- Instituting a self-haul waste sorting and recovery operation;

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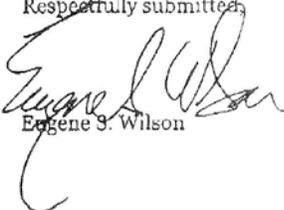
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- Establishing a salvage and re-use area for diversion of usable building materials, appliances, and miscellaneous effects;
- Placing recycling bins in an accessible location so that self-haul customers can drop-off their recyclable and reusable items prior to approaching the scale house. This would provide an economic incentive for people to source separate and recycle their wastes instead of land-filling them;
- Establishing additional power generation facilities at the site, including wind and solar.
- Instituting an ordinance to impose a mitigation fee on wastes and to encourage recycling or composting of materials, rather than land-filling. Mitigation fees would be used to offset the administrative and overhead expenses of the project, including more rapid consumption of landfill capacity, by funding programs to divert more waste from landfill.

This alternative would adopt further practices to maximize the diversion of waste from the landfill and thereby reduce the energy, air quality, resource extraction, and other impacts. This alternative could include maximizing the separate collection of biogenous waste which would allow meaningful utilization of renewable energy. The EPA reports good results from pay-as-you-throw programs charging residents based on the amount they throw away. Communities with these programs have reported significant increases in recycling and reduction in waste due to the incentives created.

12-56

In the view of the commentator, the EIR should make evident what alternatives there are that reduce the large-scale expansion of landfilling and conserve resources, energy, and air quality. The most successful alternative would involve bringing together the most successful components. Given the increasing regional role that the Antelope Valley Public Landfill is likely to play and the policies in the General Plan, developing and considering an alternative that brings together the best tools for energy and resource recovery at the AVPL would be worthwhile for decisionmakers and the public.

Respectfully submitted,

Eugene S. Wilson

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APPENDICES

- Appendix 1. Wikipedia, Natural Gas Vehicle (June 2010).
- Appendix 2. Department of Resources Recycling and Recovery, Notice of Preparation (April 30, 2010).
- Appendix 3. California Integrated Waste Management Board, How Anaerobic Digestion Fits Current Board Regulatory Structure (September, 2009).
- Appendix 4. California Integrated Waste Management Board, Current Anaerobic Digestion Technologies Used for Treatment of Municipal Organic Solid Waste (March, 2008).
- Appendix 5. California Integrated Waste Management Board, New and Emerging Conversion Technologies Report to the Legislature (June, 2007).
- Appendix 6. California Integrated Waste Management Board, Agenda Item 15 (December 11, 2007).
- Appendix 7. Wikipedia, Waste Management, Inc (June 16, 2010).
- Appendix 8. Southern California Association of Governments, 2008 Regional Transportation Plan: Making the Connections (June 16, 2010).
- Appendix 9. City of Palmdale, City of Palmdale General Plan.
- Appendix 10. State of California, Bioenergy Interagency Working Group, Bioenergy Action Plan for California (July, 2006).
- Appendix 11. U.S. EPA, Landfill Methane Outreach Program, Candidate Landfills.
- Appendix 12. U.S. EPA, Landfill Methane Outreach Program (May 12, 2010).
- Appendix 13. Gary Liss & Associates, Feasibility Study for Resource Recovery Park on or Adjacent to John Smith Road Landfill in San Benito County (December 8, 2008).
- Appendix 14. Metro Vancouver, Draft Solid Waste Management Plan for the Greater Vancouver Regional District and Member Municipalities (April 28, 2010).

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- Appendix 15. HF&H Consultants, LLC, County of Kern Recycling & Solid Waste Planning Progress Report (October 6, 2009).
- Appendix 16. Williams, R. Biofuels from Municipal Wastes-Background Discussion Paper (March 28, 2007).
- Appendix 17. County of Marin, Redwood Landfill Solid Waste Facilities Permit Revision Final Supplemental Environmental Impact Report (July 2005).
- Appendix 18. U.S. EPA, Project Profile: Altamont Landfill Gas to Liquefied Natural Gas Project (January 5, 2010).
- Appendix 19. U.S. EPA, Communicating the Benefits of Recycling (January 2010).
- Appendix 20. Stanislaus County Environmental Resources, Stanislaus Resource Recovery Facility.
- Appendix 21. Kompogas
- Appendix 22. U.S. EPA, An Overview of Landfill Gas Energy in the United States
- Appendix 23. Sanitation District of Los Angeles County, Solid Waste Facilities.
- Appendix 24. City and County of Santa Barbara, Evaluation of Municipal Solid Waste Conversion Technologies onversion Technology Study (April 4, 2008).
- Appendix 25. Waste Management, Waste Management Web Site (June 18, 2010).
- Appendix 26. U.S. EPA, Bioreactors.
- Appendix 27. Google satellite view of landfill (2010).
- Appendix 28. California Integrated Waste Management Board, Conversion Technologies Status Update Survey (April 2009).
- Appendix 29. California Energy Commission, Municipal Solid Waste Power Plants (June 2010).

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Appendix 30. U.S. EPA, Landfill Methane Outreach Program Operational Projects.

Appendix 31. Sanitation Districts of Los Angeles County, LACSD Website - Commerce Refuse-to-Energy Brochure (June 2010).

Appendix 32. California Integrated Waste Management Board, Current Anaerobic Digestion Technologies Used for Treatment of Municipal Organic Solid Waste (March 2008).

Appendix 33. California Clean Energy Committee, Petition for Recycling & Energy Conservation Antelope Valley Public Landfill EIR.

Appendix 34. Wikipedia, Landfill Gas Utilization (June 2010).

Appendix 35. Web Pages.

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Response to Letter No. 12
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Response 12-1

The comment is acknowledged. Please refer to the responses provided in the following pages which address the specific issues raised by the Committee. As requested, the City of Palmdale has added the Committee to the distribution list for all future notices regarding this matter.

Response 12-2 – A. Project Description

The response below provides clarification to the commentor's questions raised in the Project Description. CEQA Guidelines Section 15124 requires the following components to be included in a project description:

- (a) The precise location and boundaries of the proposed project shall be shown on a detailed map, preferably topographic. The location of the project shall also appear on a regional map.
- (b) A statement of objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.
- (c) A general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities.
- (d) A statement briefly describing the intended uses of the EIR.
 - (1) This statement shall include, to the extent that the information is known to the Lead Agency,
 - (A) A list of the agencies that are expected to use the EIR in their decision making, and
 - (B) A list of permits and other approvals required to implement the project.
 - (C) A list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies. To the fullest extent possible, the lead agency should integrate CEQA review with these related environmental review and consultation requirements.
 - (2) If a public agency must make more than one decision on a project, all its decisions subject to CEQA should be listed, preferably in the order in which they will occur. On request, the Office of Planning and Research will provide assistance in identifying state permits for a project.

The project description contained in the Revised and Recirculated "Amendment" to the Draft EIR complies with the above CEQA requirements. The statements on page 2-5 of the Amendment to the Draft EIR provide a "good faith" explanation of the permitting history for Landfill I consistent with the current City and County permit records. Page 2-5 states,

"Landfill I was originally permitted to operate by the Los Angeles County Department of County Engineers Office. Landfill I was permitted prior to the 1972 enactment of CEQA and was grandfathered into the City of Palmdale"

The Amendment to the Draft EIR text and Figures 1-3, County Approved Exhibit "A", 1-4, Site Plan, and 1-6, Project Boundaries, illustrate the relationship of Landfill I to Landfill II. The EIR explains the following on page 2-5:

"Immediately adjacent and to the west is a 98-acre area comprising the AVPL II (Landfill II), previously located in the unincorporated portion of the County and annexed to the City of Palmdale as of November 21, 2003, under Annexation 1998-01 (western portion, as outlined in Exhibit "A" presented on Figure 1-3)."

This statement is accurate.

Please refer to Section 2.4 of the Amendment to the Draft EIR, which provides a detailed discussion of project history and prior CEQA documentation. As explained in the EIR, the expansion application originally filed with the County of Los Angeles in 1984 was to expand the existing (Landfill I) into the unincorporated County of Los Angeles area (Landfill II). The proposed 1984 expansion was outside of the City limits at the time, therefore, the County of Los Angeles was the Lead Agency and issued a CUP for Landfill II in 1992 and a CUP modification for Landfill II in 1993.

Response 12-3

The comment is acknowledged. The commenter should note that the project applicant is the Antelope Valley Recycling and Disposal Facility, Inc., a subsidiary of Waste Management, Inc., also referred to as the Antelope Valley Public Landfill (AVPF) throughout the EIR. Because the remainder of the comment does not raise an issue regarding the environmental analysis contained in the Amendment to the Draft EIR no additional response is warranted.

Response 12-4

As stated on page 2-3 of the Amendment to the Draft EIR,

"In accordance with Section 15161 of the State CEQA Guidelines, this document is intended to serve as a "project" EIR that examines the environmental impacts of the specific development project. In this case, several discretionary actions are requested to implement the proposed project."

The commenter mistakes the statement on page 2-6 as defining the type of EIR as a supplemental EIR which is incorrect and not the type of document prepared. The statement to which the commenter refers states:

“This EIR prepared for the currently proposed project (i.e., the proposed City CUP) is a supplement to the 1992 certified EIR for Landfill II and 1993 adopted MND and intends to use those documents for purposes of focusing the current analysis.” (Amendment, p. 2-6.)

When read in conjunction with the Draft EIR and Amendment to the Draft EIR, the intent is that the EIR serves as a project EIR which has incorporated by reference the prior environmental analysis prepared for Landfill II. (See Draft EIR, pp. 2-1 thru 2-2 (Purpose of EIR/Incorporation By Reference/ Intended Uses), 2-3 (“this document is intended to serve as a ‘project’ EIR”); see also Amendment, p. 2-3 (same),). Thus, the Amendment did not intend to use the term “supplement” as that term is used under CEQA pursuant to Public Resources Code section 21166 and CEQA Guidelines section 15163. It rather indicates the “project EIR” intended to utilize the prior CEQA documents for focusing the current analysis provided in the Amendment to the Draft EIR.

As stated on page 3-1 of the Amendment to the Draft EIR,

“For a determination of environmental baseline, which provides the basis for the impact analysis, CEQA Guidelines Section 15125, as interpreted by case law (*Fairview Neighbors v. County of Ventura* (1999) 70 Cal.App.4th 238, 242-243; [see also *Fat v. County of Sacramento* (2002) 97 Cal.App.4th 1270, 1278-1280 (upholding use of unauthorized expansion of airport as baseline)], allows using the permitted conditions as environmental baseline for analyzing impacts in an EIR. However, existing operations can be utilized to prepare a “worst case” analysis. In the analysis of traffic impacts for the proposed project, this method of analysis was used to project a more conservative or “worst case” scenario.”

Thus, the Draft EIR did not rely solely on existing permitted levels of operation, as the City arguably could have, but rather on actual averaged truck traffic based on accepted tons per day. (See Draft EIR, p. 4.7-6 (using actual truck and traffic counts); see also Amendment, p. 4.7-6 (same).) The baseline reflects actual existing conditions at the time of the NOP consistent with CEQA.

Response 12-5

Solid Waste Facility Permit #19-AA-0009 was issued for Landfill I on December 26, 1995. SWFP #19-AA-5624 was issued for Landfill II on June 12, 1997. This information is provided on page 2-5 of the Amendment to the Draft EIR.

Response 12-6

According to CEQA Guidelines Section 15125 (a) (Environmental Setting),

“an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives.”

Initial construction of Landfill II began in the summer of 2006, and has been consistent with the County Approved CUP Number 85512-(5), amended CUP No.93041-(5), 1992 Certified EIR (State Clearinghouse Number 1990010988), 1993 Mitigated Negative Declaration (increasing tonnage to 1,800 tons per day), 1995 MND for Alternative Daily Cover, and subsequent permits including WDRs Order No. 6-95-1, dated January 12, 1995, permit from the RWQCB. Landfill II began receiving refuse in April 2007 following the receipt of required permits including, a FOC approved 4/20/95, SWFP #19-AA-5624 issued 6/12/97 and WDR 6-95-1 adopted by RWQCB on 1/12/95. The LFII interim cell design was initially approved by RWQCB via 7/21/06 email correspondence. Formal written approval for PhaseVA-1 was issued on 11/20/06 and Phase VA-2 was issued on 2/27/07 by the RWQCB.) The receipt of refuse at LFII also began after the completion of all required pre-grading conditions/mitigation outlined in CUP Compliance Matrices on file with the City of Palmdale as provided in May 2007.

There has been no unpermitted grading as implied by the commenter. Prior to grading/clearing, Landfill II was issued appropriate clearances/permits by the Regional Water Quality Control Board, LEA, CIWMB, and Department of Fish and Game. A detailed CUP compliance matrix and mitigation monitoring program for Landfill II are on file with the City of Palmdale and the County of Los Angeles. The biological and archaeological surveys contained in the County Certified EIR included the 11-acre parcel between the two landfills. Pre-grading surveys and monitoring were completed consistent with the County's CUP conditions and are noted in the compliance matrix.

The relocation of SCE's distribution and transmission facilities was conducted by SCE in the summer of 2006. According to SCE, the facilities were relocated on private property per the Public Utility Commission (PUC) standards and requirements.

Response 12-7

The proposed project will increase the area for waste disposal by 11 acres as shown on the Figure 1-6, Project Boundaries. The expansion of the 11 acres provides a very efficient addition

to the landfill by allowing for placement of waste within the “V”-shape between Landfills I and II, as well as other design efficiencies that were incorporated in the overall larger footprint. As shown in the proposed project base grading and fill plans (Figures 3-9 to 3-11), the expansion would provide an approximate 12.8 million cubic yard increase in the total capacity due to the added disposal area and efficiency gains afforded by the landfill design with the wedge expansions. The estimated waste volumes for the currently permitted and proposed expansion were computed using AutoCAD or similar 3-D models. The computed volumes are supported by substantial evidence in the record and can be independently confirmed.

Response 12-8

Please refer to the table below which show the actual percentages of the total Antelope Valley (AV) MSW tonnages received at the AVPL during 2005 (baseline), 2009 (County attachment to comment letter) and 1st quarter 2010 (current).

**Table 3-1
Antelope Valley Public Landfill Solid Waste Disposal Summary**

	City of Palmdale Tons	City of Lancaster Tons	AV LA County Unincorporated Tons	Total AV Local Area Tons*	Total Tons	% Outside AV Area Waste**	% AV Local Area Waste***
2005	145,379.00	20,565.00	74,040.00	239,984.00	370,799.00	35%	65%
2009	95,850.36	18,111.28	55,137.29	169,098.93	266,742.98	36%	64%
1 st Q 2010	17,792.22	1,949.83	12,175.79	31,917.84	43,177.05	26%	74%
* Includes Palmdale, Lancaster, and Unincorporated Antelope Valley Area Tons ** % Outside AV Area Waste = [(Total Tons-Total AV Area Tons) / Total Tons] x 100 *** % AV Area Waste = (Total AV Area Tons / Total Tons) x 100							

The summary breaks down the Los Angeles County unincorporated area tonnages specific to those originating from the “Antelope Valley,” demonstrating that a majority of the waste stream received at AVPL originates from the local area. The Lancaster Landfill is within approximately 13 miles (25 miles roundtrip) of the AVPL. Clean loads of green and wood material are stockpiled and processed on-site then are shipped to a facility for use as boiler fuel (and not sent to Lancaster). AVPL trucks also bring in curbside greenwaste collected on routes that is used as ADC in the landfill. Although AVPL still receives some of this ADC material, some has also been diverted to Lancaster mainly due to the expansion delays with the City of Palmdale. The recycled waste is often sent to Lancaster because that site has the area and facilities to process such waste at higher volumes, and therefore, can justify the use of more curbside greenwaste for use as daily cover.

Page 4.7-7 and Figure 4.7-5 of the Amendment to the Draft EIR describe in detail the existing and future landfill traffic distribution. As indicated in the EIR, the 85 percent local roadway traffic was estimated based upon previously approved traffic studies for the landfill and the field distribution and operations conducted in 2005 (Draft EIR baseline). The results of the traffic impact analysis for SR-14 (please refer to response 7-1 within Section 2.0 and response 16-5 within this section) indicate that a 15 to 20 percent change in the distribution would not have a measurable effect on the impact analysis conclusions.

Response 12-9

The baseline used as part of the Draft EIR and revised and re-circulated sections of the Amendment was established at the time of issuance of the Notice of Preparation as is typical under CEQA. (CEQA Guidelines, § 15125.) The commenter's suggestion to consider the growth projections contained within the 2008 RTP is noted but deemed not to be required for purposes of considering the potential effects of the proposed project against the baseline established in 2004.

Response 12-10

Please refer to pages 3-34 and 3-35 of the Amendment to the Draft EIR which indicate that a six (6) percent growth rate projection was utilized for the traffic, air quality, and noise analysis. This growth rate exceeds the commentor's suggested growth rate of five (5) percent.

Response 12-11

The comment is acknowledged. The proposed project components are outlined in detail in Section 3.4 (Description of the Proposed Expansion) of the Amendment to the Draft EIR and Figures 1-4 – Site Plan; 1-5 – Ancillary Facilities Layout Plan; 3-6 – Stormwater Management Plan; 3-7 – Proposed Liner System; and 3-8 to 3-11 – Proposed Base Grading Plan and Fill Plans. The proposed erosion protection alternatives are described in Section 4.3 (Hydrology and Water Quality) and depicted on Figure 4.3-3 – Scour Protection Cross Sections and 4.3-4 – Post-Development Surface Water Control Plan. Proposed traffic mitigation/improvements are illustrated on Figures 4.7-13 – Proposed Realignment of City Ranch Road to be Opposite Rayburn Road at Tierra Subida Avenue and 4.7-14 – Proposed City Ranch Road Roadway Cross-Section.

Response 12-12 – B. Current Public Policy on Energy Conservation

The comment is acknowledged as are the City General Plan goals and policies summarized by the commenter. As noted by the commenter, the City has been taking action to “encourage” energy conservation. It has also been “promoting” energy audits of existing structures. The proposed project would encourage customers to “recycle to the extent possible.” If the City were to certify the EIR and adopt the proposed project, such action would not be inconsistent with the General Plan goals and policies referenced by the commenter.

Furthermore, the Bioenergy Action Plan for California, referenced by the commenter, does not represent a regulatory requirement; rather it is a series of policy objectives to be achieved by California in the coming years. One of the goals of the plan is to facilitate the development of biofuels projects by removing the various obstacles that exist in the state. WMI is fully supportive of this plan, and one of WMI's staff is on the Executive Board of the California Biomass Collaborative, which helped draft this Plan. The Plan's successful implementation may make it more possible to develop biofuels projects at landfills, particularly smaller sites like AVPL. The Plan demonstrates the difficulty in creating viable biofuels projects in California.

The California Renewable Portfolio Standard (RPS) is a requirement placed on utilities to achieve a certain percentage of their power from renewable sources. It is not a requirement that is to be placed on an individual project; therefore, it is not relevant to the proposed landfill expansion for the AVPL. Certainly if WMI is able to make a landfill gas (LFG) to electricity project viable at AVPL in the future, the power sold by that project would help the utility achieve its RPS goals. With respect to the U.S. EPA's Landfill Methane Outreach Program, please see Response 12-13 below.

Response 12-13 – C. Landfill Gas-to-Energy Technology

As explained below, the City and WMI are aware of the various technologies available to recover LFG for beneficial use. Reciprocating engines, gas turbines, microturbines, and LFG to vehicle fuel projects are all in place at landfills across the country, including WMI landfills. However, each of those projects, as well as the projects cited on pages 6 and 7 of the commenter's letter, were determined feasible prior to implementation. The same is not true for the AVPL as explained below, and are not required at this time under CEQA because adoption of the proposed project or the reduced (1,800 tpd) alternative would not result in a significant impact on the environment from the generation of greenhouse gas emissions (either on a project specific or cumulative basis) with mitigation. As explained throughout the EIR, moreover, the nature of the project (e.g. a disposal msw landfill project) will not cause the "generation" of greenhouse gas emissions such that a significant adverse impact to climate change will occur. The msw will continue to be generated with or without the proposed project.

With that said, the City offers the additional responses below, and has modified Mitigation Measure 4.2-6 to further address the commenter's concerns. Please refer to the Errata contained in Section 4.0 of the Final EIR document.

The Los Angeles County Sanitation District landfills (e.g., Palos Verdes Landfill and Puente Hills Landfill) cited by the commenter are much larger than the proposed AVPL project and produce significantly more LFG, often because they are not in such an arid environment. For example, the Puente Hills Gas-to-Energy facility is a conventional Rankine Cycle Steam Power Plant

using LFG as fuel to generate electricity. LFG is fired in the plant's boilers producing superheated steam. The superheated steam is used to drive the steam turbine/generator to generate electric power. Currently, the Puente Hills Landfill facility produces approximately 46 MW net of electric power. The power is sold to the local utility company, Southern California Edison. Increasing LFG production rates at Puente Hills Landfill provided an opportunity for additional power generation. In 2006, construction was completed on an 8 MW landfill gas-fired internal combustion engine facility at Puente Hills. In order to maximize project value, a direct power line was run from Puente Hills to the San Jose Creek Water Reclamation Plant (WRP), where power from the new facility is used to displace retail power purchases (source: <http://lacs.org/>).

According to "weather.com," Palmdale has an average annual rainfall of 7.3 inches per year, and Walnut, where the Spadra Landfill is located, has an average annual rainfall of 17.01 inches per year. The rainfall at the Spadra site is typical for the Los Angeles basin for temperate climates. Rainfall less than 10 inches per year is considered a very arid climate. With over twice the annual rainfall, LFG generation at Spadra will be significantly higher than AVPL since precipitation has a direct affect on LFG generation. As such, the referenced landfills are not comparable to the AVPL when assessing its feasibility for such a LFGTE or LFGTLNG/CNG project.

As noted by the commenter, the U.S. EPA Landfill Methane Outreach Program (LMOP) (see <http://www.epa.gov/lmop/>) supports the recovery of LFG for beneficial use. WMI is an LMOP partner and actively participates in LMOP's activities and programs. WMI, for example, now has 124 projects that use landfill gas for alternative energy. This portfolio includes 56 LFGTE plants that WMI has developed, owns, and operates internally, with over 250 engines and turbines producing almost 300 MW of power. WMI continue to grow by 8 to 10 new projects per year. For each project, WMI Renewable Energy Group evaluates the LFG technology most applicable for the landfill, performs a feasibility study of project viability, and manages the project development, construction, and operation. AVPL is included on the list of sites for potential future development of a LFGTE or LFGTLNG/CNG facility if, as explained below, the LFG flow rates and methane quality at AVPL increase such that a LFGTE or LFGTLNG or CNG plant at AVPL becomes feasible.

Generally, the first hurdle for a landfill gas project, including those suggested by the commenter, is ensuring that there will be sufficient landfill gas with suitable quality to support the project throughout a life of 20 years or more. Conversely, the first priority of operating a gas collection system is to maintain environmental controls for landfill gas surface emissions, odor, and migration. In some situations, achieving a sufficient quantity and quality of fuel can conflict with operating a well field for compliance, as described below.

The flow rates at AVPL have generally exceeded 700 scfm (standard cubic feet per minute) during 2010; however, those rates have varied greatly from a high of 1,080 scfm to, most recently, a low of 671 scfm. Please refer to Appendix B of this document. The gas flow model for AVPL predicts, under current operating conditions, a gradual increase in flow rates which eventually reach roughly 1,200 scfm in 6 to 8 years. Under the recommended 1,800 tpd alternative, moreover, peak production rates of 1,600 scfm are expected. To be technically and economically feasible at the AVPL, a LFGTE project would require a reliable landfill gas flow rate of approximately 1,200 scfm with 50 percent methane quality and low oxygen content. A feasible LFGTLNG/CNG facility would require approximately 2,500 scfm with 50 percent methane quality and low oxygen. (TC with Paul Pabor, WMI (September 27, 2010).)

Gas flows are anticipated to continue to fluctuate in the future under normal operating conditions and well field build-out schedules. A small decrease in flow would result in insufficient fuel for even one engine. Additionally, as recycling and increased diversion of organic waste continues, the methane generation potential of the disposed refuse is anticipated to decrease. These factors increase the uncertainty of the feasibility of such LFG projects at this time, in part, because achieving the required long-term gas flows is not foreseeable. This trend has been documented by CARB as a result of implementing AB 939. In the *California's 1990-2004 Greenhouse Gas Emissions Inventory and 1990 Emissions Level, Technical Support Document* for the statewide GHG inventory under AB 32 (CARB, 2009), Table 37 shows the decrease in biodegradable carbon in the waste stream in California, starting in 1995, the first year of compliance for AB 939. CARB attributes this decrease, which continues through the 2004 inventory year, to implementation of increased diversion under AB 939. Decreases in biodegradable carbon in the waste stream have a direct reducing influence on the methane generation potential of that waste. If, as proposed by SB 737 (Chesbro), but recently vetoed by the Governor on September 28, 2010, the Legislature eventually requires a 75 percent increase in diversion of organics for certain sectors (e.g., multifamily and commercial uses) to landfills for purposes of reducing their methane generating potential, the feasibility of LFGTE and LFGTLNG/CNG plants at arid landfills such as the AVPL will be further cast into doubt.

The quality of the gas is also an issue which generally relates to the percentage of methane. Depending on the site, landfill gas usually consists of about 50 percent to 60 percent methane and the balance of carbon dioxide when it is produced in the landfill. In dry climates such as Palmdale, the percentage of methane is generally less. A gas collection system extracts gas by placing a vacuum on the system of wells and pipes. The vacuum will pull in a small amount of air into the system, which introduces oxygen and nitrogen into the landfill gas mixture, and dilutes the methane content. The vacuum is increased as needed to provide the adequate control level for emissions, migration, and odor. The higher the vacuum, the higher the potential for diluting the methane content, so environmental control measures can be at odds with achieving quality gas.

At AVPL, the vacuum level currently needed for adequate environmental control has resulted in a methane content that fluctuates in the low to mid 40 percent range. Please see Appendix B of this document. While some engine vendors allege that only a minimum methane content in the low 40's is required, WMI has found through experience at other sites that reliability, efficiency, and maintenance is feasible only where the gas is above about 48 percent. This is especially true at dry landfills such as AVPL where the balance between compliance and gas quality is sensitive to the vacuum control, and where WMI is still in the process of tuning the well field for this balance. Thus, additional time is required for the landfill gas flows and quality needed to sustain a LFGTE or LFGTLNG/CNG plant will be realized at the AVPL, while also continuing to meet existing regulatory requirements for LFG compliance. The California Air Resources Board (CARB), moreover, recently passed the Landfill Methane Rule under AB 32, which will require even more stringent control of surface emissions than currently occurs, which may increase the vacuum needed for compliance. This will further restrict the AVPL's ability to improve the gas quality.

AVPL will continue to operate the well field to meet current and AB32 compliance requirements, while striving to maintain the gas quality to meet the needs of reliable engine performance. The AVPL has only recently reached a methane content of 48 percent. Typically, for a site with marginal gas, WMI look for a 6-month period of sustained flow with good quality gas before committing to a project, as well as a high confidence level that this flow will be sustained in the future.

Proceeding now with a minimally sized LFGTE project (e.g., one engine with a capacity of 1.6 MW and gas flow requirement of 600 scfm) would also not avoid or substantially lessen any of the significant adverse environmental impacts of the proposed project (or of the reduced (1,800 tpd) alternative), and is therefore not required under CEQA. Additionally, the infrastructure costs associated with having to engineer, construct a utility interconnect (of which there is none at AVPL), pay the costs of a utility interconnect fee, construct the electrical transmission infrastructure etc. for such a modest project also render a LFGTE plant at AVPL infeasible at this time.

Mitigation Measure 4.2-6 has been revised to reflect this response and the City's consideration of the comments regarding alternative LFGTE or LFGTLNG/CNG projects at the AVPL. Mitigation Measure 4.2-6 now requires implementation of a LFGTE or LFGTLNG/CNG facility at AVPL when landfill gas flow rates and quality achieve the levels needed to support one of the respective projects.

Response 12-14 – D. Municipal Solid Waste Power Plants

The comment is acknowledged.

There are only three remaining “traditional” waste to energy (WTE) plants (i.e., mass burn) in California (Long Beach (1988), Commerce (1987), and Stanislaus County (1989)). All recent efforts to develop new plants have been unsuccessful in the communities where they were proposed for a variety of permitting issues (source: <http://www.energy.ca.gov/biomass/msw.html>). As indicated above, the last WTE in California (Stanislaus County) was permitted more than twenty years ago. WMI is very supportive of the WTE technology through its Wheelabrator subsidiary, but developing such a project in California is simply not a feasible option due to the very stringent permitting and environmental review processes in the state and the uncertainties of the feasibility of such a project, including unfavorable economic conditions when compared to the existing solid waste management infrastructure (e.g., relatively low landfill tipping fees). The other “conversion technologies” (CTs) cited are unproven in large scale applications, and many cannot be developed in a financially sound manner at this time. There are a number of communities evaluating pilot projects using different technologies, but no large scale plant will be coming online in the short term. Many proposed CT projects involving municipal solid waste have already been rejected by municipalities or otherwise failed to develop, including for example projects proposed in the City of Sacramento (plasma arc) and City of Lancaster (anaerobic digestion). WMI is developing a pilot CT project at one of its Oregon landfills that will utilize the plasma arc technology; however, this project and others like are still in the experimental phase and certainly do not support an investment of millions of dollars for a full-scale facility.

As such, there are simply not viable alternatives to be considered at this time until it is demonstrated that they are permissible in the state, the technology is proven on a commercial scale, uncertainties regarding environmental impacts are resolved, and financial viability is proven on an actual operating plant in a similar California community to Palmdale. The fact of the matter is that no new large scale thermal CTs, such as pyrolysis, gasification, or plasma arc have ever been installed in California, so the suggestion that the firms developing these technologies have “proven track record” is simply incorrect. Some of the CTs (such as waste gasification, plasma arc, etc.) have not been developed on a commercial scale here in the U.S., and there is limited data available on existing international facilities so as to ascertain what the long-term energy and environmental impacts will be. Further, it is unclear whether these technologies are permissible here in California since most of them entail essentially some form of waste combustion, which has not been permitted in the state for many years due to CEQA and other environmental review issues. Some biological CTs (such as anaerobic digestion) are technologically feasible; however, they can only manage a portion of the MSW waste stream (e.g., source-separated organics) require extensive pre-processing of the waste, generate residuals that must be managed, and their cost per ton of equivalent tipping fee is much greater than landfilling with estimates ranging from \$120 to \$150/ton.

Response 12-15 – E. Methane Fermentation Technology

The comment is acknowledged.

Methane fermentation or anaerobic is a technology that is technologically feasible for the organic portion of various waste. However, it has various limitations including a need for source separated organics and significant pre-processing of the waste which are infeasible for large scale projects, such as the proposed project, because of the large volumes of mixed waste required to be processed. Thus, large scale projects using municipal solid waste simply cannot be developed in an economically sound manner. Previous estimates for the technology have been in the range of \$120 to \$150 per ton equivalent tipping fee, which is simply unattainable in these tough economic times.

Response 12-16 – F. Energy Impacts

The commenter's opinion that the project has the potential for significant energy impacts because "LNG does not save energy over diesel fuel to any significant degree" is noted. CEQA requires any potentially significant energy implications of a project to be considered in an EIR to the extent relevant and applicable to the project. (CEQA Guidelines, Appendix F (II).) The commenter references information in the EIR regarding WMI's gradual conversion of its truck fleet to LNG/CNG or other alternative fuels, which is primarily designed to reduce GHG emissions and for cleaner air quality as compared to diesel-fueled vehicles which contribute to criteria air pollutants and toxic emissions (i.e., diesel particulate). AVPL's provision of LNG at the site and accessible to the public helps decrease reliance on fossil fuels such as natural gas and fossil fuel derived diesel, thereby offsetting energy use from traditional sources (please refer to Section 1.5, Additional Energy Information, of this Final EIR document).

Response 12-17

The commenter claims the proposed increased daily tonnage would result in a considerable increase in energy used for hauling refuse to the site and landfilling larger quantities of msw. Regardless of whether or not the proposed project, or alternative thereof, is approved by the City, msw will continue to be generated in California. That waste will need to be transported to a permitted Class III landfill for disposal. Without the proposed project, msw may need to be transported longer distances (e.g., to Lancaster Landfill (approx. 25 miles roundtrip) or, if Lancaster cannot accept the waste, to the Chiquita Canyon Landfill (approx. 90 miles roundtrip)), than if the waste were to be disposed of at the AVPL, resulting in more VMT and energy use per year and a corresponding increase in regional CO₂ emissions. Therefore, although the project would continue to contribute to energy use and CO₂ emissions regionally, the emissions would be similar or less than the net increase in energy use/emissions without the project.

A portion of the proposed daily tonnage increase was anticipated to serve large capacity transfer trucks from existing waste transfer stations, rather than by smaller individual packer trucks. These larger trucks can reduce energy use by moving more refuse with fewer overall vehicle miles traveled, thereby resulting in less overall fuel use and fewer emissions. As noted above, increasing the ability of the AVPL to accept more tpd could decrease overall energy use and regional VMTs since the no-project alternative would involve hauling existing waste longer distances in, potentially, smaller waste collection trucks.

It should also be noted that staff has decided to recommend approval of the Reduced Project Alternative-Expansion (11-acre) with no increase in daily permitted tonnage (1,800 TPD) which would result in a continuation of existing operations at permitted levels. AVPL/WM is agreeable to staff's recommendation. Please also refer to Section 5.2.3 (pages 5-12 to 5-14 for a detailed analysis on this alternative) of the Amendment to the Draft EIR; see also Section 1.5, Additional Energy Information, of this Final EIR document addressing the recently revised Appendix F (Energy Conservation) contained within the CEQA Guidelines. These additions do not change the Amendment to the Draft EIR conclusions.

Response 12-18

The commenter claims the EIR does not report the baseline average daily vehicle count for the landfill. Please refer to the Amendment to the Draft EIR Traffic Section 4.7 (page 4.7-6 and Table 4.7-3), which do provide the existing baseline traffic conditions. As stated on page 4.2-11, "For purposes of presenting a worst case air quality impact analysis, the existing daily traffic (416 truck trips) and disposal volume (1,372 TPD) were treated as the baseline, and disposal volume was presumed to instantaneously jump to the maximum allowable disposal volume of 5,548 TPD which equates to 1,134 truck trips."

Staff's recommendation to approve the 1,800 TPD disposal alternative, as the environmentally superior alternative, would eliminate the commenter's concern that the proposed project would result in significant adverse energy impacts from increased daily tonnages or truck trips.

As noted above, the number of trash trucks on the road and the amount of vehicle miles traveled hauling refuse is a regional issue. An individual landfill does not generate a demand for refuse disposal; it accommodates existing demands and is planned to meet future demands based on population growth. Energy consumption from landfilling is minimized if the disposal facility is located close to the source of refuse generation and/or if larger capacity trucks are used for longer haul trips. Each of these scenarios allows for less vehicle miles to be traveled, less fuel consumption, and thus less energy-related impacts. As an additional benefit, reduced haul distances also result in air quality and GHG benefits (reductions) associated the lower fuel consumption. Please also refer to Section 7.1, Growth Inducing Impacts of the Amendment to

the Draft EIR for a more detailed discussion of the factors which do not make the project growth inducing.

Response 12-19

The commenter claims that the proposed project would result in a 77 percent increase in the volume of landfilled material and consequently a potentially significant energy impact. The commenter's opinion is noted. Regional energy use for refuse disposal and transport is linked to the capacity at an individual landfill only if the capacity at that landfill is limited and longer driving distances would be required to deliver the waste an alternate site. Such is the case here where adding capacity close to existing active landfill reduces the need for increased out-of-area disposal and hauling, resulting in less energy use. Increasing the landfill capacity without increasing the acceptable daily tonnage will have no significant effect on short-term or annual energy consumption; it will merely allow the landfill to accept the community's refuse for additional years. Without the capacity increase, the future waste tonnages would have to be disposed of somewhere and will likely require being transported longer haul distances to another landfill, as explained in Response 12-17 above, resulting in an increase in energy use, when the existing capacity is consumed. The provision of local landfill capacity that reduces travel distances and on-going recycling efforts to reduce energy consumption were the basis that allowed the Initial Study to conclude that there was no impact to energy resources requiring an energy impact analysis in this document (please refer to Section 1.5, Additional Energy Information, of this Final EIR document.)

Response 12-20

The commenter requests that the EIR quantify the fuel requirements that would be needed for excavating new landfill cells, disposing and compacting msw, excavating or importing daily cover and for related activities. The commenter infers that the EIR needs to engage in a life cycle analysis of all the existing and proposed activities at the AVPL that would require the use of fossil fuels, including the extraction, refining and transport of crude oil to the site which, in the commenter's opinion, would create a cumulative impact on the environment. According to Section 15130(b) of the *State CEQA Guidelines* the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact. CEQA does not require lead agencies to engage in a speculative life cycle analysis such as that required by the commenter. (See Appendix F (energy implications of a project shall be considered to the extent relevant and applicable to the project); see also *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912 (reasoning that "neither Appendix F, itself, nor any other authority requires that an EIR discuss every possibly energy impact or conservation measure listed in Appendix F").)

Please also refer to Table 3-3 and page 3-13 of the Amendment to the Draft EIR which indicates that there will be no significant changes or additions to existing Landfill Equipment and Personnel. Page 4.2-11 of the Amendment to the Draft EIR also notes that the equipment needed to process the increased disposal will not be measurably different from existing on-site, off-road equipment.

If the msw is not landfilled at AVPL, it will likely be landfilled elsewhere with similar and possibly greater energy impacts, including increased use of diesel and/or LNG. Please see Response 12-17 for additional details on the impact of increased haul distances for alternative landfill sites.

Fuel consumption was calculated, moreover, as part of the greenhouse gas/climate change analysis for the 3,613 TPD project. Please refer to Appendix C-1, AB-32 Compliance Study of the Amendment to the Draft EIR. Vehicle fuel consumption demand for mobile on-road trucks under the proposed project, for example, was calculated in the EIR to increase from 564 gallons per day of diesel fuel plus gasoline to 1,181 gallons of combined fuels. The fuel increase was not linearly proportional to tonnage because the expanded operation was presumed to use higher load factors (tons/mile) than the smaller capacity “packer” truck fleet. For the Reduced Project Alternative, on-road fuel consumption was presumed to be roughly proportional to existing permitted disposal rates because no transfer of refuse to large-load vehicles would occur. Please refer to Appendix C-1, AB-32 Compliance Study of the Amendment to the Draft EIR. The input parameters for the three analyzed scenarios were as follows:

	Existing	3613 TPD	1800 TPD
Surface Street Trucks (D)	1945 ADT	4039 ADT	2552 ADT
Freeway Trucks (D)	936 ADT	1944 ADT	1228 ADT
Auto & Small Truck (Gas)	1155 ADT	2530 ADT	1515 ADT

For assumed fuel efficiencies of 13.75 mpg for self-haul and 6 mpg for heavy diesel, the following fuel consumption would result under the same scenarios:

	Existing	3613 TPD	1800 TPD
Diesel Trucks	480 gal	997 gal	630 gal
Self-Haul Gasoline	84 gal	184 gal	110 gal
TOTAL Fuel	564 gal	1,181 gal	740 gal

The resulting GHG emissions from internal combustion sources, such as diesel or gasoline-fueled engines, were calculated by combining published conversion data from fuel burned to GHG emissions assuming 306 days of allowable maximum disposal. Annual metric tons (MT) of CO₂ emissions are calculated as follows:

	Existing	3613 TPD	1800 TPD
On-Road Trucks	1492 MT	3099 MT	1958 MT
Self-Haul	233 MT	511 MT	306 MT
Off-Road Equipment	1850 MT	2434 MT	2434 MT
TOTAL	3575 MT	6044 MT	4698 MT

The EIR concluded that neither disposal alternative would cause a significant adverse effect on the environment from either direct or indirect GHG emissions.

Approval of the 1,800 tpd Reduced Size Alternative would result in a less than significant increase in fuel used at the site and therefore would not be a significant or wasteful use of energy. If the same refuse were disposed of at another landfill, the fuel consumption and GHG impacts would likely be greater due to increased haul distances (see Response 12-17).

Response 12-21

The commenter asserts energy will be required for a new signalized intersection, an additional truck scale, staffing and extended hours of operation and that the energy efficiency of the buildings on site should be evaluated. Energy demands for new intersection signals are within the City’s jurisdiction and are anticipated to be minimal since new regulations require all new traffic lights to be light-emitting diode (LED) versions.

Onsite, the largest structures at the AVPL are used for truck maintenance and parts storage and service and are not air conditioned. Maintenance bays are open to the outside with substantial natural light. Thus, no existing on-site structures are believed to be substantial energy consumers or wasters. No new buildings are proposed as part of the project. All existing and any future proposed buildings, if any ever are proposed, would comply with Title 24 of the California Code of Regulations, California’s Building Energy Efficiency Standards, which are meant to promote energy efficiency and reduce the wasteful, inefficient, and unnecessary consumption of energy. (See, e.g., Pub. Resources Code, § 21100, subd. (b)(3); *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912.) Please also refer to the above response regarding no significant changes in Landfill Equipment or personnel.

Response 12-22

The commenter requests that the EIR evaluate and implement all feasible ways to recover energy from the waste stream at AVPL. Generally, capturing methane in LFG and combusting it to generate electricity for on-site energy needs or to convert to LNG/CNG reduces energy demands and GHG emissions by: reducing direct methane emissions that may otherwise result

from flaring; and by displacing electricity demand and the associated indirect GHG emissions from electricity production.

A LFG to energy or LFG to LNG/CNG plant has been considered by the AVPL and determined to be infeasible at this time. This is for two main reasons. First, the existing and anticipated LFG at AVPL is of relatively poor quality, amount and reliability needed to create a viable LFG to energy or LFG to CNG/LNG facility. Second, the anticipated costs of a LFG to energy or LFG to LNG/CNG plant at AVPL would outweigh the expected net return on investment if that energy or LNG/CNG were to be sold.

With respect to the first reason, over the last several months, the gas quality at the AVPL has average around 43 percent methane. This level of methane content is not sufficient to meet the minimum requirements for successful engine operation for a LFG to energy plant - where approximately 50 percent methane is required at AVPL. Also because of the very dry climate in the Palmdale area, it is difficult to get the necessary gas production to improve the gas quality (TC with Paul Pabor, WMI (September 27, 2010)) as low precipitation results in reduced gas generation as documented in the U.S. EPA's landfill gas emissions model (LandGEM). Please refer to Appendix C-1, AB-32 Compliance Study of the Amendment to the Draft EIR. Under low gas production situations, WMI's substantial operational experience with LFG systems shows that it is more difficult to extract high quality gas without air intrusion when the gas production is low. This is documented throughout the landfill industry where landfills in arid climates have lesser gas quality (i.e., lower methane concentrations). Examples include landfills throughout the Central Valley of California, Phoenix area, Imperial County, Las Vegas area, etc. Recent existing LFG rates at AVPL have also proven unreliable. LFG rates flux from 1,080 scfm 671scfm. Given the volume fluctuation as well as the marginal quality of the gas at this site to ensure sustainable operation, an LFG to CNG/LNG plant would require at least 1,200 scfm (TC with Paul Pabor, WMI (September 27, 2010)).

The California Air Resources Board's (CARB's) recent passage of the Landfill Methane Rule under AB 32 is also a factor of consideration. That rule will require more stringent control of landfill surface emissions than currently occurs and therefore even less ability to capture additional methane or improve gas quality for a LFG to energy or LFG to LNG/CNG project. This is because when a LFG system is operated to control surface emission down to very low levels as stipulated in the AB 32 rule, it causes more air intrusion (i.e., the gas system pulls in more ambient air along with the LFG when it is operated to better control emissions near the surface), which reduces the methane content of the gas. Finally, because recycling and organic diversions are anticipated to continue increasing under pending GHG regulations, the methane generation potential for disposed refuse is expected to decrease, thereby lessening the potential to achieve the higher methane content and gas rates needed. When degradable material is removed from the waste stream, this lowers the methane generation potential of the waste (i.e.,

the so called “Lo” term in the LandGEM first order decay equation for methane generation at landfills). This means that the amount of methane produced from an equivalent amount of waste disposed will be less if that waste stream is depleted of its organic and degradable material. This is especially true given staff’s recommendation to approve the Reduced 1,800 tpd alternative. This phenomenon has also already been documented by CARB in their methane generation model inputs used in the statewide GHG inventory under AB 32 as resulting from the implementation of AB 939. CARB’s models inputs (methane generation potential or Lo value) document a decline in the methane generation potential starting in 1990 with the initial implementation of AB 939, with that potential getting lower as diversion rates increased over time. This is only expected to continue reducing methane generation potential as increased diversion occurs beyond the current 50 percent level.

Secondly, in addition to investigating the technical feasibility of a LFG to energy or CNG/LNG project at AVPL, WMI/AVPL conducted a preliminary fiscal analysis. This analysis considered the costs of engineering, construction of infrastructure, operations, and utility interconnect and compared those to the potential revenue for sale of the electricity to the local utility, SCE. At the projected sustainable level of gas recovery which is presently 700 to 889 cfm of LFG at approximately 43 percent methane, (analyzed over 10 to 15 years time horizons), no LFG reuse alternative was determined to be feasible at this time. (See also Response 12-13.)

Response 12-23

The commenter states that the possibility of the project impacting a valuable clean-energy resource should be carefully evaluated. As reflected in Response 12-22, the potential for converting LFG to energy or an alternative fuel source has been considered at AVPL and is not feasible at this time. Additionally, many other factors must be considered when deeming an energy resource valuable, including the cost of production and its cost-competitiveness with other conventional resources, and indirect potential negative effects to the environment. Many alternative energy projects unfortunately do not produce energy at a cost-competitive rate unless there are additional incentives to off-set the differential. Further, many of the so-called “conversion technologies” (CTs) are unproven as to their technological feasibility, energy consumption, and/or environmental impacts. Some of the CTs (such as waste gasification, plasma arc, etc.) have not been developed on a commercial scale here in the U.S., and there is limited data available on existing international facilities so as to ascertain what the long-term energy and environmental impacts will be. Further, it is unclear whether these technologies are permissible here in California since most of them entail essentially some form of waste combustion, which has not been permitted in the state for over a decade due to CEQA and other environmental concerns. Some CTs (such as anaerobic digestion) are technologically feasible; however, they can only manage a portion of the MSW waste stream (e.g., previously source-separated organics) and their cost per ton of equivalent tipping fee is much greater than landfilling with estimates ranging from \$120 to \$150/ton. As such, they are not feasible to

consider at this time for AVPL and would represent an unacceptable risk due to the many uncertainties associated with them, including economic non-viability, additional environmental and operational impacts due to pre-processing of the waste (e.g., for grinding and screening), and additional operational effects resulting for the need to source-separate specific organics. Finally, the site could potentially recover (in the future if LFG rates increase and stabilize) methane to be converted to clean energy when additional material is disposed in the landfill. Each of these other technologies would, however, remove organic waste from the landfill thereby reducing the energy potential of the LFG and contributing to the existing infeasibility of a LFG to energy project at AVPL. See also Response 12-13.

Response 12-24

Please see Responses 12-13 and 12-22 through 12-23.

Response 12-25

The commenter claims the AVPL is similar in size to the Spadra Landfill which operates a materials recovery and Rankine Cycle Steam Power Plant. AVPL has a recycling program in place to accept and utilize many of the same materials as those recovered at Spadra. Spadra has been closed for ten years and the amount of land available at the AVPL is smaller such that a facility of the Rankine plant would not fit. When Spadra was operational, many recyclable resources were not separated until they had been brought to the landfill where they were recovered and then hauled away again. Presorting through a TS/MRF prior to landfilling is now the standard procedure. This changes the pattern of recycling and recovery potential. Because of improved technologies for waste and LFG management that have developed over the last ten years since Spadra closed, it is anticipated that the AVPL can and will be operated in a more environmentally beneficial manner than many older landfills in Southern California. This includes increased recycling, better pre-sorting of waste, improved load checking programs, better landfill and LFG system designs, more efficient landfill operations, etc. Further, the Rankin cycle engine in use at the Spadra Landfill is an experimental technology that is only being used at a limited number of landfills with mixed results. At the present time, it is not considered a viable option for a commercial LFG to energy project at this time at AVPL, in part, because Spadra produces significantly more LFG than AVPL. According to the Los Angeles County Sanitation Districts' website Spadra produces approximately 5 MW of power from LFG. Based on site monitoring data for AVLF, the landfill presently only collects enough LFG for a 1.5 to 2 MW plant. This makes various energy recovery options more viable when a project can support as much as 5 MW, and such a project realizes a much greater benefit in the economics of scale than one less than half of its size.

Response 12-26

The commenter claims the EIR should evaluate the potential energy savings from recycling as opposed to landfilling. As explained above, recycling and source separation at existing

TS/MRFs generally occurs prior to transport and disposal of waste at AVPL. This practice is not expected to change if the proposed project or Reduced Alternative is approved. In fact, under AB 939 and the currently proposed AB 737 (Chesbro), recycling on a statewide level will likely be expanded. AB 737 would, for example, apply to every multi-family dwelling and commercial business in California and direct the state (CalRecycle) to come up with a plan to reach a 75 percent diversion rate by 2020.

Recycling is discussed throughout the Amendment to the Draft EIR. (See Figure 1-3; see also pp. 1-6, 1-22, 3-4, 3-9, 3-10, 3-13, 3-30, 4.2-31, 4.6-7, 4.7-1, 4.7-6, 5-9, 5-11, 5-12, 5-21, and 8-8.)

Response 12-27

The commenter states that the EIR should evaluate the indirect impacts of accepting additional waste at the site per day and consider feasible mitigation to reduce the quantity of material landfilled. Please refer to Section 7.2 (pages 7-1 and 7-2) of the Amendment to the Draft EIR, which provides an analysis on Long-Term Implications of the Project outlining specifically how long the Wedge Expansion can extend the landfill life. As noted above, City staff is recommending approval of the Reduced Project Alternative – Expansion (11-acre) with no increase in daily permitted tonnage (1,800 TPD). Please refer to Section 5.2.3 (pages 5-12 to 5-14) of the Amendment to the Draft EIR for a detailed analysis on this alternative.

Response 12-28 – G. Climate Change Impacts

The comment is acknowledged. These are the GHG sources analyzed.

Response 12-29

The commenter suggests several measures be required prior to issuance of a CUP. Specifically:

Haul truck conversion to natural gas – WMI is investing in the use of alternative transportation fuels (e.g., CNG/LNG) and engine design to lower the GHG emissions for its entire hauling fleet. WMI has, to date, replaced over 500 diesel-fueled vehicles with natural gas fueled trucks and has retrofitted over 1,100 vehicles with advanced pollution control devices. WM also continues to use a fleet routing software to maximize collection efficiencies and minimize fuel use.

Idle reduction – Idling at the fee booth has been reduced through modernized weighing procedures and trucks are required to limit idling in place to no more than five minutes as required by existing state law.

Landfill equipment – There are no state GHG emission standards for landfill equipment. The referenced emission standards are for particulate matter and nitrogen oxides. There is a small

GHG benefit because newer engines are somewhat more efficient, but the GHG saving is small compared to the overall emissions burden. The AVPL will continue to comply with federal, state and local laws as may be adopted in the future.

Biodiesel fuel – Use of biodiesel as a GHG reduction option has been evaluated by a number of experts with mixed results. Some have concluded that when the life cycle of GHG emissions from planting, cultivation, fertilization, harvesting and processing of corn or soy beans (when those or other food sources are used) are considered, biodiesel may actually increase GHG emissions compared to CNG or ultra low sulfur with enhanced filter traps/petroleum-based diesel. CARB came to this conclusion when they considered the carbon intensity of various fuels under AB 32. Ethanol produced from corn or soy beans, for example, were not designated as low carbon fuels due to the energy intensity involved with their production, even though they were displacing fossil fuels.

Third party contracts – To the extent future third-party contracts are required to serve the AVPL, the site will negotiate those contracts with the goal of favoring haulers who demonstrate use of alternative or other clean fuels (see Mitigation Measure 4.2-6 in the Amendment to the Draft EIR). See also Response 12-19.

LFG recovery –Please see Responses 12-12 and 12-22 for further details.

Organic material diversion – WMI already diverts and recycles green waste and wood scrap at AVPL for use as a fuel in the mineral products industry. The complete diversion of organics would require intensive pre-sorting and still require subsequent treatment and disposal of the organic fraction. It would also decrease the LFG production and make it less likely that a LFG beneficial use project would be developed.

GHG reduction plan – the Amendment to the DEIR concluded that the direct and cumulative contribution of the AVPL project to climate change would be less than significant. (Amendment, p. 4.2-32.) The EIR reflects the same conclusions of less than significant if the City decided to follow staff's recommendation to approve the Reduced 1,800 tpd alternative. (Amendment, p. 5-12.) Nevertheless, given the overall threat of climate change generally, the EIR requires preparation of a complete and enforceable GHG reduction plan. (Amendment, pp. 4.2-30 thru -31 (MM 4.2-5).)

WMI, moreover, is a member of the California Climate Action Registry and has established company-wide commitments to quantification and reporting of the company's carbon footprint, as well as commitments to reduce that footprint to the extent feasible. WMI will adapt these company-wide GHG practices to site-specific conditions at the AVPL, if and when they become feasible, which will allow for a reduced carbon footprint for the landfill over time.

WMI is committed to recycling as much of the waste-stream as can be diverted and for which there is a market for the recycled material. Construction and demolition debris and green-waste are currently recycled, and an e-waste and household hazardous waste acceptance facility operates on-site. Any substantial increase in recycling would require construction of a materials recovery facility which is currently not planned at AVPL.

Furthermore, all recycling is not created equal. Composting, for example, is now known to have significant volatile organic compound (VOC) emissions when its emissions are not collected and controlled. Therefore, uncontrolled composting of organic waste can have more VOC emissions compared to a landfill where the VOCs are collected and destroyed in LFG. So, even though the composting has energy benefits, it also can create adverse environmental effects due to VOC emissions. As such, recycling must be considered on a case-by-case.

Response 12-30 – H. Air Quality Impacts

The commenter claims the air quality analysis is inconsistent and dated. The analysis was current and correct at the time of the EIR's preparation. Please refer to above Response 12-4. There have been subsequent changes in the regulatory environment, particularly with regard to ozone. The one-hour federal standard was revoked and replaced with an 8-hour standard. The Antelope Valley is classified as a non-attainment area for the federal 8-hour and the state 1- and 8-hour ozone standards. The ozone attainment plan for the air basin was modified to remove the previous 1-hour attainment goal of 2007 and replaced with an 8-hour attainment goal of 2021. The air basin is designated as being in attainment or unclassified (insufficient data) for every other air pollutant, including for all sizes of particulate matter. The analysis is correct in stating that there is substantial dispersive capacity in the basin for CO and NO₂ in that peak background levels are far below their most stringent standards.

Response 12-31

As shown in Table 4.2-5 of the Amendment to the Draft EIR, the AVAQMD CEQA significance threshold for NO_x is 137 pounds per day. At 123 pounds per day, cumulative NO_x increases from all sources of the proposed project will not exceed the threshold and are therefore considered less than significant on a project specific basis. The cumulative contribution of the proposed project, however, in addition to existing operations and reasonably foreseeable future related projects, was concluded to be significant and unavoidable for NO_x and ROG. (Amendment, p. 4.2-32.)

Response 12-32

The immediate conversion of all diesel equipment and hauling trucks at the AVPL to LNG/CNG as suggested by the commenter is infeasible. (See Responses 2-13 and 2-29). It is also not required by CEQA to avoid or substantially lessen significant adverse impacts of the proposed

project or, especially, the Reduced 1,800 tpd Alternative recommended by staff. Fueling onsite heavy duty diesel equipment with CNG/LNG, moreover, is infeasible as such equipment is not yet commercially available as the lack of horsepower needed (e.g., needed for dozers) has been an issue ((TC with Marty Tufte, WMI (October 1, 2010)). As stated in the Amendment to the Draft EIR, there are no impacts that exceed AVAQMD CEQA significance thresholds, including Appendix G of the revised Guidelines related to GHG emissions. The conversion of the refuse collection fleet to LNG is in progress as new replacement trucks are CNG/LNG fueled.

Response 12-33

AVPL does not yet produce LFG in sufficient quantity to make a LFG to motor fuel facility or a LFG to electricity project economically viable due to poor economies of scale and methane content deficiency as detailed previously (Responses 12-12 and 12-22). Again, the comment notes that this is a mitigation measure, but the air quality impact does not exceed the adopted significance thresholds that would require consideration of mitigation. Even if LFG production were to ultimately rise to a level where a beneficial use were to become viable, Federal New Source Performance Standards (NSPS) and California Title 17 and 27 regulations necessitate that a landfill maintain a back-up flare for gas surges, processing equipment outage, etc. Some LFG would be flared even with a beneficial use in place.

A bioreactor at the AVPL would not be needed to maximize LFG recovery since recovery is contingent on the types of waste landfilled and the quality of the LFG collection and recovery system. Bioreactors, moreover, require large amounts of liquids which would require additional truck trips to AVPL since liquids are not currently received for at the site for this purpose (even assuming the liquids could be obtained in the amount that would be required). Bioreactors also typically result in large albeit shorter lifespan spikes in air quality emissions because msw breaks down more rapidly than a traditional dry msw landfill. Given the arid nature of the site and the amount of liquids that would be required, and the fact that other additional adverse impacts may result from bioreactor technologies, the AVPL has declined to pursue this suggested alternative.

Response 12-34

The existing weigh station/fee booth has a state-of-the-art computerized system to minimize truck waiting times. Landfill equipment is turned off when not engaged in processing waste in accordance with state law. Idling trucks and off-road equipment expend fuel and consume driver and operator time when not in active use that could be productively used elsewhere. These measures are not considered mitigation in that they are part of the project design and existing operations.

Response 12-35 – I. Resource Exhaustion and Extraction Impacts

The commenter's opinion that landfilling is far from a perfect solution is noted. The commenter's suggestion that the EIR must consider all possible alternatives to landfilling as part of the EIR for the proposed project, however, is not required under CEQA. CEQA requires lead agencies to identify and consider in an EIR a "reasonable range" of potentially feasible alternatives that avoid or substantially lessen the significant adverse impacts of a project, and which will attain most of the project objectives. (See *California Oak Foundation v. Regents of the Univ. of Ca.* (Sept. 3, 2010) ___Cal.App.4th___) (upholding University's analysis of alternatives to stadium project.) In accordance with Section 15126.6(a) of the CEQA Guidelines, the EIR including the Amendment to the Draft EIR provides a range of reasonable alternatives. The Amendment to the Draft EIR, specifically, provides an analysis of four (4) different alternatives as directed by City staff through the planning process (refer to Section 5.0 Alternatives to the Proposed Project of the Amendment to the Draft EIR).

Response 12-36

The comment is acknowledged. The AVPL recycles materials that are transferred to the site to the extent they can be economically recovered from the waste stream and for which there is a market. Residential recyclables are curbside pre-sorted and processed as separate waste streams. Any additional recycling in the mixed municipal waste would require construction of a materials recovery facility which is not a currently planned project at the AVPL. The comments regarding the benefits of recycling generally are noted.

Response 12-37

Current recycling activities are driven by the character of the waste-stream and the economics of recycling. A number of suggested resources in this comment (construction debris, green-waste, tires, hazardous materials, etc.) are already being extracted and re-used or recycled at the AVPL as explained in the EIR. Additional recycling of the mixed waste is not economically viable at the present time. In California and at the AVPL, under AB 939, 50 percent of the existing waste stream received does not consist of traditional recycling materials.

Response 12-38

Recycling activities at the AVPL are described in responses above. AVPL is also the site of the Antelope Valley Environmental Collection Center (AVECC) which is open to the public twice per month for the disposal of electronic waste and for the disposal of household hazardous waste (batteries, oil, paint, etc.). No further response is required.

Response 12-39

The commenter's perception of his site visit and conversation with WM staff is acknowledged. Some recyclables are stockpiled prior to processing such that processing activities are not necessarily in evidence at any specific point in time that an individual may visit the site. Many

source-separated recyclables from Palmdale, for example, are collected and sent off-site for further processing. The recycling activity is quite active, but not always necessarily at the AVPL itself.

Response 12-40

WMI provides separate containers to customers within its contracted service area for mixed refuse, for recyclable paper and metals and for green-waste. Other services include bulky item pick-up, Christmas tree recycling, landfill vouchers, and periodic extra trash bags, and allowance for bundled extra refuse. The AVECC is open the first and third Saturdays to the public. Scavenging is prohibited as a safety and public health issue, and not to discourage recycling. It is not within the jurisdiction or control of the City of Palmdale to improve recycling in other surrounding jurisdictions.

Response 12-41

The comment is acknowledged as is the commenter's inferred preference that the City and County move toward an almost "zero waste" model. Although some within City staff and the public may philosophically agree that a zero waste goal for the City is desirable, in that the existing waste stream could be handled so as to avoid direct disposal in landfills or through the reduction, reuse or recycling of waste to the extent that no residuals remain unclaimed, such goals, even if they were to be adopted, are infeasible given the existing waste handling methods and facilities available. Such efforts require working collaboratively with other municipalities, the County, AVPL and other landfills, to recommend and implement changes that would help eliminate waste streams and increase recoverable resources. This is something the City and AVPL are not necessarily opposed to doing. Such efforts, however, are larger than the potential effects of the proposed project and therefore would lack a nexus or reasonable relationship to the proposed project if attempted to be required as mitigation.

Response 12-42

The comment is acknowledged. See also Response 12-41. The commenter's suggestion to include a recycling center and conduct source reduction programs are outside the project scope. The AVPL currently engages in public education and outreach. The details surrounding a possible future MRF have yet to be identified sufficient enough to engage in meaningful environmental review of such activities. With current source separation programs in Palmdale, moreover, fewer high value materials arrive in the mixed waste stream at the AVPL. As stated in above response 12-8, recyclable materials collected at AVPL are often sent to Lancaster because that site has the area and facilities to process such waste at higher volumes.

Response 12-43

The comment suggesting financial incentives for recycling is acknowledged. Such consideration is outside the scope of this project, however, because such incentives would lack

a nexus to the significant impacts of the proposed project and, rather than be proposed on a project-by-project basis, should be implemented by a universal statewide or regional mandate for purposes of consistency and enforceability. Financial incentives for recycling already exist in the Antelope Valley, for example, at several buy-back centers and at numerous reverse CRV vending machines. Disposal fees are also being included in many products (tires, oil, electronics, etc.) to the point where recycling is economically preferred to landfilling. Such financial incentives, however, cannot be implemented by a single landfill operator or a single political jurisdiction.

Response 12-44 – J. Landfill Exhaustion Impacts

Please refer to above Response 12-4 regarding the proper environmental baseline reflecting the time of issuance of the NOP. The second paragraph of page 2-5 of the Amendment to the Draft EIR refers to the “capacity of Landfill I” not the total “approved” capacity of the AVPL. Consistent with the County approved CUP No. 85512 and Figure 1-3 – County Approved Exhibit “A” of the Amendment to the Draft EIR; the Antelope Valley Public Landfill, Landfill II (AVPL- LF II) began receiving refuse in 2007 following the receipt of required permits including, a FOC approved 4/20/95, SWFP #19-AA-5624 issued 6/12/97 and WDR 6-95-1 adopted by RWQCB on 1/12/95. The LFII interim cell design was initially approved by RWQCB via 7/21/06 email correspondence. Formal written approval for PhaseVA-1 was issued on 11/20/06 and Phase VA-2 was issued on 2/27/07 by the RWQCB.) The receipt of refuse at LFII in 2007 also began after the completion of all required pre-grading conditions/mitigation outlined in CUP Compliance Matrices on file with the City of Palmdale as provided in May 2007.

Submittals of the biennial monitoring reports required under County Conditional Use Permit No. 85512-(5), Part VIII – Monitoring Reports were made in March (draft)/April (Final) 2008 and March (draft)/April (Final) 2010 to the required agency contacts. The reports include detailed information on; cumulative total of all waste deposited, landfill survey information, waste density, rates of waste received, recycled or diverted, interaction with solid waste management plans, complaints/ violations, horticultural monitoring and archaeological and paleontological monitoring.

Response 12-45

Please refer to above Response 12-7, which explains the additional capacity numbers and Responses 12-9 and 12-10, which explain the population projections used in the Amendment to the Draft EIR analysis. Section 7.2, Long Term Implications of the Amendment to the Draft EIR, addresses the long-term capacity implications of the project and reduced project alternative. It should be noted that staff is recommending approval of the Reduced (1,800 tpd) Project Alternative, which was found to be environmentally superior to the project.

Response 12-46

The comment is acknowledged. The Public Services Element of the General Plan on page PS-43 states,

“Other landfills in the region are starting to reach capacity and thus influencing dumping activities at the Palmdale site. Waste Management operates a landfill in Lancaster and recently indicated that the Lancaster landfill has sufficient capacity to accommodate the City of Lancaster’s growth. In addition, the fee structure for waste disposal influences the decision of private haulers to dump in Palmdale rather than another site. If the fees are comparatively lower, more private haulers and disposal companies may use the Palmdale landfill and fill the site faster. If all other landfills are full, haulers may divert solid wastes to the Palmdale site as long as it continues to accept private haulers.”

Based on the project objectives outlined in Section 3.4.1 of the Amendment to the Draft EIR, the Proposed Project and Reduced Project Alternative are consistent with the above General Plan policy.

Response 12-47

The commenter’s assertions and opinion are acknowledged.

Response 12-48

Please refer to above Response 12-43 regarding financial incentives and Responses 12-54 and 12-55 regarding the “reasonable range” of project alternatives.

Response 12-49

Please refer to above Responses 12-23 through 26 regarding recycling and materials and energy recovery. The commenter’s opinions about landfilling are noted.

Response 12-50

Please refer to the above responses regarding the external costs of siting a new landfill. If the City approves the Reduced Alternative it would maximize the life of the landfill as requested by the commenter.

The proposed project is not in conflict with the proposed permit as opined by the commenter. To provide a worst case analysis, the Amendment to the Draft EIR assumed truck trips and associated impact analysis with a “total” peak tonnage of 5,548 (including refuse and recyclables and ADC). Section 3.0 of the Draft EIR and specifically page 3-10 outlines this peak tonnage as one of the proposed project components. The impact analysis address this peak tonnage throughout the Draft EIR including pages 1-6, 3-10, 3-11, 3-12, 3-30, 4.2-11, 4.2-12, 4.2-22, 4.2-24, 4.5-8, 4.5-9, 4.7-1, 4.7-2, 4.7-13, 4.7-15, 4.7-16, 5-4, 5-13, and 5-14.

Response 12-51 – K. Water Quality Impacts

As stated in response 9-4, in Section 2.0 of this Final EIR, “The Draft EIR analysis did consider the nature of impacts to downstream water bodies and provides a detailed analysis of the potential surface water quality impacts and the measures that will be implemented to prevent potential impacts to the sediment load of the Anaverde Creek.” Pages 3-15 through 3-19 (including Figure 3-6) discuss the project’s proposed Drainage Control and Surface Water Management System. Additionally, pages 4.3-14 and 4.3-15 and Figure 4.3-4 outline the project’s Stormwater Management Plan and Erosion Control Measures to be implemented for stormwater runoff prior to discharge to the Anaverde Creek. Lastly, Section 4.4 of the Draft EIR also addresses this issue. Mitigation Measure 4.4-3 states,

“Prior to issuance of the landfill’s Waste Discharge Requirements (WDRs), the project engineer shall finalize erosion and siltation control plans and other BMPs, as necessary to prevent graded and cleared areas from being eroded, resulting in the transport of sediment downstream to Anaverde Creek.”

Considering existing regulations for landfill construction, the location of the project site and the required mitigation measures, no reasonably foreseeable significant adverse impacts on water quality would result from the proposed project to Anaverde Creek or Lake Palmdale.

Response 12-52

The comment is acknowledged. However, pursuant to the Amendment to the Draft EIR text and figures, the proposed liner is a 2-foot clay base not 2-inch clay base.

Response 12-53

The comment is acknowledged. Section 4.8, Risk of Upset/Human Health of the Amendment to the Draft EIR provides analysis and mitigation to address this issue in accordance with CEQA.

Response 12-54 – L. Alternatives Analysis

The comments on the top of page 18 of this response letter are the commentor’s opinion and are not accurate based on the analysis contained in the Amendment to the Draft EIR. Based on Section 5.0, Alternatives to the Proposed Project, of the Amendment to the Draft EIR the following alternatives were evaluated and compared for this proposed project:

- 5.2.1 No project
- 5.2.2 Reduced project (height)
- 5.2.3 Reduced project – expansion with no increase in daily permitted tonnage (1,800 tons per day (tpd))
- 5.2.4 Alternative locations/expansions of Lancaster Landfill

It is unclear what the commenter means regarding Alternatives A-D as they do not appear to apply to this proposed project. In addition, Section 5.3 and Table 5-3 of the Amendment to the Draft EIR (pages 5-21 and 5-22) discuss the identification of the environmentally superior alternative. According to Section 5.3, the Reduced Project, Expansion with No Increase in Daily Permitted Tonnage (1,800 tpd) Alternative would best represent the environmentally superior alternative while still meeting five of the eight project objectives. According to Table 5-3, the No Project alternative and the Reduced Project alternative would reduce but not avoid all of the significant cumulative unavoidable impacts associated with the project and other projects combined. While the "Reduced Project" alternative would meet five of the eight project objectives, the "No Project" alternative would only meet one of the eight project objectives. Furthermore, similar to the Reduced Project alternative, the No Project alternative does not avoid the cumulative unavoidable traffic and air quality impacts.

Response 12-55

CEQA does not require the EIR to include all alternatives to the proposed project as may be suggested. In accordance with Section 15126.6(a) of the CEQA Guidelines, the EIR including the Amendment to the Draft EIR provides a range of reasonable alternative to the proposed project, or to the location of the project, which could feasibly attain the basic objectives of the project. The EIR including the Amendment to the Draft EIR must also evaluate the comparative merits of the alternatives. By providing this range of alternatives, the decision-makers are allowed to take action within the range presented in the EIR. The Amendment to the Draft EIR provided an analysis of four (4) different alternatives as directed by City Staff and the land planning process (refer to Section 5.0 Alternatives to the Proposed Project of the Amendment to the Draft EIR).

The CEQA Guidelines Section 15126.6(f) states:

The range of alternatives required in an EIR is governed by "rule of reason" that requires the EIR to set forth only those alternative necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. 15126.6(f)(3) states: "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (*Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979) 89 Cal.App. 3d 274)." In helping to define the range of alternative analysis necessary, the Court in *Bowman v. Petaluma* (1986) 185 Cal. App. 3d 1065, held that CEQA does not require analysis of every imaginable alternative or mitigation measure; what is required is the production of information sufficient to permit a reasonable choice of alternatives so far as

environmental aspects are concerned; i.e., a range of alternatives that adequately represents the spectrum of reasonable alternatives.

As noted above, staff is currently recommending approval of the 1,800 TPD disposal alternative (the current CUP-approved tonnage) as the environmentally superior alternative. The "Reduced Project" alternative does reduce but does not completely eliminate the cumulative unavoidable traffic and air quality impacts. Because these unavoidable traffic and air quality impacts are cumulative by nature, they would occur with or without the project. The "No Project" alternative only achieves one of the eight project objectives.

Please refer to above responses 12-14 and 12-23 related to solid waste conversion and anaerobic digestion facilities.

The commenter also suggests including a "Mitigated Alternative" similar to that adopted by Marine County for the Redwood Landfill Project. The commenter paraphrases the alternative adopted for that project, concluding that a similar alternative considered and adopted for the AVPL would maximize the diversion of waste from the landfill and thereby reduce the energy, air quality and resource extraction and other impacts. The Mitigated Alternative referred to by the commenter was not so narrowly focused, however.

Although not mentioned, the Mitigated Alternative adopted by Marin County also allowed for: a lateral expansion of 12.5 acres for disposal; 2,310 tpd of total material received, and; approximately 5,621,700 cy of additional total airspace. Adoption of the Mitigated Alternative also extended the site life to 2024. (See SWFP No. 21-AA-0001; see also Redwood Landfill Final EIR, p.2-19 (SCH No. 1991033042) (March 2008).)

Staff's recommendation to adopt the Reduced Project (1,800 tpd) Alternative with the 11 acre wedge expansion is similar to the Mitigated Alternative referenced by the commenter. Under the proposed project and under the Reduced Project Alternative, moreover, the AVPL would continue to maximize diversion of greenwaste, concrete, asphalt, wood waste and other recyclable materials from the landfill as is currently the practice. (See Amendment to the Draft EIR, p. 3-4 (AVPL diverts approximately 3,500 to 8,500 tpd per year).) The Mitigated Alternative suggested by the commenter is substantially similar to the Reduced Project Alternative recommended by staff for the AVPL and would not avoid or substantially lessen any significant adverse impacts of the Reduced Alternative. As stated above, the EIR includes a reasonable range of alternatives as required by CEQA.

Response 12-56

The comment which expresses the “view of the commenter” regarding alternatives is acknowledged and responses consistent with the CEQA Guidelines have been provided above. The proposed 11 acre infill is, moreover, not deemed to be a “large-scale” expansion.

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Letter No. 13

07/07/2010 11:56 7602417308 R5



California Regional Water Quality Control Board
Lahontan Region



Linda S. Adams
Secretary for
Environmental Protection

Victorville Office
14440 Civic Drive, Suite 200, Victorville, California 92392
(760) 241-6583 • Fax: (760) 241-7308
<http://www.waterboards.ca.gov/lahontan>

Arnold Schwarzenegger
Governor

July 7, 2010

File: Environmental Doc Review
Los Angeles County

Richard Kite, Assistant Director of Planning
City of Palmdale
Planning Department
38250 Sierra Highway
Palmdale, CA 93550

COMMENTS ON THE AMENDMENT TO DRAFT ENVIRONMENTAL IMPACT REPORT, ANTELOPE VALLEY PUBLIC LANDFILL, LOS ANGELES COUNTY, STATE CLEARINGHOUSE NO. 1990010988

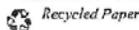
13-1

California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received the Amendment to the Draft Environmental Impact Report (DEIR) on May 26, 2010, for the above-referenced project. The amended DEIR, dated May 2010, was prepared by EDAW/AECOM on behalf of the City of Palmdale and submitted in compliance with provisions of the California Environmental Quality Act (CEQA). Currently there are two permitted landfills at the facility. Landfill I is unlined with a Subtitle D permitted refuse footprint of 57 acres. Landfill II is a composite-lined landfill with a permitted refuse footprint of 57 acres. Landfill II has been built-out in phases with the most recent phase of construction completed in August 2008. The planned project consists of the following components: 1) increase the capacity of the facility by combining Landfill I and II; 2) increase the permitted waste footprint from 114 acres to 125 acres by incorporating the land gap (11 acres) between the two landfills; 3) increase the active life of the landfill by approximately 1.5 years (through year 2026); 4) lateral waste expansion and installation of a liner system (11 acres) between Landfill I and II; 5) an increase in the permitted elevation of Landfill II by 60 feet from 3,140 feet above mean sea level (AMSL) to 3,200 feet AMSL; and 6) armoring of the north bank of the Anaverde Creek to protect against flooding, scour, and erosion.

13-2

Water Board staff has reviewed the amended DEIR for the above-referenced project and is submitting the following comments in compliance with CEQA Guidelines, California Code of Regulations (CCR), title 14, section 15096, which requires responsible agencies to specify the scope and content of the environmental information germane to their statutory responsibilities. We request that the following comments be addressed and incorporated into the final environmental document prepared for the project.

California Environmental Protection Agency



**Letter No. 13,
Continued**

07/07/2010 11:56 7602417308

R6

Mr. Kite

- 2 -

July 7, 2010

General Comments

13-3

The initial DEIR was circulated for review in December 2005; which at that time, Landfill II had not been constructed. Landfill II has subsequently been built-out in phases. The initial phases of construction were completed in 2006. The most recent phase of construction was completed in August 2008. The project description and figures included in the amended DEIR have not been updated to reflect that Landfill II has been constructed and began receiving waste in 2006. The project description and figures include in the amended DEIR should be updated to reflect current site conditions.

Basin Plan

13-4

The State Water Resources Control Board (State Water Board) and the Regional Water Board regulate discharges in order to protect the water quality and, ultimately, the beneficial uses of waters of the State. The Water Quality Control Plan for the Lahontan Region (Basin Plan) provides guidance regarding water quality and how the Water Board may regulate activities that have the potential to affect water quality within the region. The Basin Plan includes prohibitions, water quality standards, and policies for implementation of standards. The Basin Plan can be accessed via the Water Board's web site (http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml).

We request that the final environmental document reference the Basin Plan in the Hydrology and Water Quality analysis section for the project and require that the project proponent comply with all applicable water quality standards and prohibitions, including provisions of the Basin Plan.

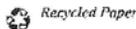
Potential Impacts to Surface Waters

13-5

The project area includes marked (blue line) surface waters, specifically Anaverde Creek, that is either a water of the U.S. or a water of the State. Surface waters include, but are not limited to, drainages, streams, washes, ponds, pools, or wetlands, and may be permanent or intermittent. Waters of the State may include waters determined to be isolated or otherwise non-jurisdictional by the U.S. Army Corps of Engineers (USACE). Project implementation will require the appropriate jurisdictional delineation for Anaverde Creek. The results of the delineation will be used to determine if the proposed dredge and fill activities will be certified under section 401 of the Clean Water Act or through Waste Discharge Requirements (WDRs) issued by the Water Board.

Please be advised that the practice of channelizing, straightening and lining streambeds changes a streams hydrology by decreasing water storage capacity and increasing water flow velocity, which in turn leads to increases in the severity of peak discharges. These hydrologic changes tend to exacerbate flooding, erosion, scouring, sedimentation and, ultimately, near-total loss of natural functions and values, thereby resulting in the increased need for engineered solutions to re-establish the disrupted flow patterns.

California Environmental Protection Agency



Letter No. 13, Continued

07/07/2010 11:56 7602417308

R6

Mr. Kite

- 3 -

July 7, 2010

13-5 Cont'd

The DEIR does not provide specific information regarding potential impacts to surface waters, particularly impacts to in-channel and riparian areas of Anaverde Creek. The environmental document needs to quantify these impacts and discuss the purpose of the project, need for disturbance, and alternatives (avoidance, minimize disturbances, and mitigation). If impacts to Anaverde Creek are unavoidable, then we request that the project be designed such that it would minimize impacts and maintain existing hydrologic features and patterns to the maximum extent feasible.

13-6

Potential Impacts to Water Quality and Beneficial Uses

Surface waters are a significant resource, which perform a variety of important hydrologic and biogeochemical functions that affect water quality. In particular, riparian areas associated with both perennial streams and ephemeral drainages provide a natural buffer and help mitigate and control water quality impacts by removing pollutants and sediment from surface runoff. Realignment, channelization, lining, and/or infilling of Anaverde Creek, its tributaries, and/or other intermittent or ephemeral drainages as a result of project implementation will impair the beneficial uses by reducing the available riparian habitat thereby eliminating the natural buffer system to filter runoff and enhance water quality.

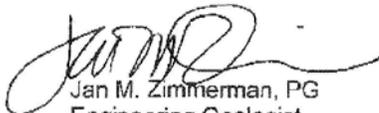
Anaverde Creek is identified in the Basin Plan as a minor surface water. Beneficial uses associated with these waterbodies include municipal and domestic supply (MUN), agricultural supply (AGR), groundwater recharge (GWR), water contact recreation (REC-1), non-contact water recreation (REC-2), warm freshwater habitat (WARM), and wildlife habitat (WILD). Realignment, channelization, lining, and/or infilling of Anaverde Creek will result in changes in the stream channel functions and may adversely affect these beneficial uses, particularly MUN, GWR, WARM, and WILD.

13-7

Closing

Thank you for the opportunity to comment on the amended DEIR. If you have any questions regarding this letter, please contact me at (760) 241-7376 (jzimmerman@waterboards.ca.gov) or Patrice Copeland, Senior Engineering Geologist, at (760) 241-7404 (pcopeland@waterboards.ca.gov).

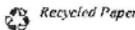
Sincerely,


Jan M. Zimmerman, PG
Engineering Geologist

cc: State Clearinghouse (SCH 1990010988)

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California Environmental Protection Agency



Response to Letter No. 13
California Regional Quality Control Board, Lahontan Region – July 7, 2010

Response 13-1

The comment is acknowledged, but does not raise an issue regarding the environmental analysis contained in the Amendment to the Draft EIR; therefore, no response is warranted.

Response 13-2

The comment is acknowledged. This comment letter and the Board's January 27, 2006 comment letter have been responded to and are hereby incorporated into the Final EIR.

Response 13-3

According to CEQA Guidelines Section 15125 (a) (Environmental Setting),

“an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives.”

The construction of Landfill II has been consistent with the County Approved CUP Numbers 85512 and 93041, Certified EIR State Clearinghouse Number 1990010988, and subsequent approvals/permits including the WDR 6-95-1, dated January 12, 1995, permit from the RWQCB. The proposed project description has not changed and CEQA does not require lead agency to update the environmental baseline for purposes of an EIR's analysis. As a policy matter, a few lead agencies would ever complete the CEQA process if updates to the environmental setting were continually required.

Response 13-4

The comment is acknowledged. Section 4.3, Hydrology and Water Quality of the Amendment to the Draft EIR has been revised accordingly and the additions to reference the Lahontan Region Basin Plan on pages 4.3-5, 4.3-12, and 4.3-21 are included within Section 4.0 of this Final EIR. The minor additions do not change the EIR conclusions.

Response 13-5

Please refer to Response 9-4 in Section 2.0, page 2-44 of this Final EIR.

Additionally, the Amendment to the Draft EIR includes a jurisdictional delineation of Anaverde Creek and provides information regarding potential impacts to and mitigation measure for the jurisdictional area's delineated within the Anaverde Creek. Please refer to pages 4.4-8 (Impact 4.4-2), 4.4-9, and Appendix E of the Amendment to the Draft EIR.

Response 13-6

Please refer to Response 3-4 above and Response 9-4 in Section 2.0, page 2-44 of this Final EIR. As explained in the referenced responses, the proposed project will not adversely affect other beneficial uses of the Creek and will be consistent with the Basin Plan.

Response 13-7

The comment is acknowledged, but does not raise an issue regarding the environmental analysis contained in the Amendment to the Draft EIR; therefore, no response is warranted.

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Letter No. 14



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

July 7, 2010

IN REPLY PLEASE REFER TO FILE: **EP-5**

Mr. Richard Kite
Assistant Director of Planning
City of Palmdale Planning Department
38250 North Sierra Highway
Palmdale, CA 93550-4609

Dear Mr. Kite:

**ANTELOPE VALLEY PUBLIC LANDFILL
AMENDMENT TO DRAFT ENVIRONMENTAL IMPACT REPORT
CONDITIONAL USE PERMIT NO. 98-12, CITY OF PALMDALE**

14-1

Thank you for the opportunity to provide comments on the proposed project. The project consists of the following main components: 1) Reconfigure the existing Landfill I and Landfill II into one contiguous disposal area, thereby increasing the disposal area from the existing aggregate of 114 acres to 125 acres; 2) increase the permitted intake of refuse from 1,800 tons per day (tpd) to 3,600 tpd; 3) increase the total intake of refuse and beneficial use materials, including alternative daily cover, from 3,564 tpd to 5,548 tpd; and 4) construct additional ancillary facilities, including a recycling drop-off/transfer center. As part of this new proposal, the existing County-approved Conditional Use Permit (CUP) would be replaced by a City of Palmdale CUP since the City of Palmdale annexed on November 21, 2003, the portion of the Landfill that was previously located in a County unincorporated area.

We have reviewed the Amendment to the Draft Environmental Impact Report (Report), dated May 2010, as required by CUP No. 98-12, and have the following comments:

1. Environmental Programs
 - a. The proposed expansion will require a Finding of Conformance (FOC) from the Los Angeles County Solid Waste Management Committee/ Integrated Waste Management Task Force in accordance with the requirement of the Los Angeles County Countywide Siting Element (CSE). The CSE was approved by the majority of the cities containing the majority of the population in the County, as well as by the County of Los Angeles Board of Supervisors, and CalRecycle.

NOTE: 2009 Solid Waste Disposal Summary Reports by Facilities attachment is included in Appendix D of this document.

**Letter No. 14,
Continued**

Mr. Richard Kite
July 7, 2010
Page 2

14-1
Cont'd

- b. In Section 2.0, on page 2-8, the Report indicates that Section 3.0 and Appendix A-5 contain a discussion on how Antelope Valley Public Landfill (AVPL) meets the criteria set forth in the CSE. However, such a discussion was not found in the referenced sections. Please provide clarification or revise the Report to include a discussion on how the proposed project will meet each of the Disposal Facility Siting Criteria listed in Chapter 6, Volume 1, and Appendix 6-1, Volume 3, of the CSE. (Refer to our comment letter dated January 26, 2006.)
- c. In the Traffic Analysis in Table 4.7-1A, page 4.7-2, the assumed traffic originating from Palmdale is assumed to be approximately 85 percent, while the projection for traffic from outside of Palmdale is 15 percent. According to the disposal reporting information Waste Management submitted to this Department, the 2009 data show that only 36 percent of all disposed waste originated from Palmdale (see enclosed). In other words, 64 percent of waste originated from outside of the Palmdale or Antelope Valley area. Please revise the traffic and air quality analyses according to this distribution and evaluate the potential traffic increase on the SR-14 and I-5.
- d. In the Traffic and Circulation Section, page 4.7-1, it is unclear whether the existing traffic analysis includes traffic associated with the Antelope Valley Environmental Collection Center, an on-site household hazardous waste collection facility. If not, please revise to include a discussion and appropriate traffic and air quality analyses relating to this use.
- e. Section 1.0, page 1-7, states there will be a proposed construction of ancillary facilities, one of which is a recycling drop-off/transfer center. The Report does not clearly describe the facility and the activities that will take place. The Report should be revised to include a discussion on the proposed activities, the proposed daily tonnage to be received by the center, and associated traffic and air quality impacts. If the facility qualifies or becomes a Transfer/Processing Facility as defined under State regulations, the facility may require an amendment to the City of Palmdale's Nondisposal Facility Element pursuant to Section 50001(a)(2) of the California Public Resources Code.
- f. Should any operation within the subject project include the construction, installation, modification, or removal of underground

**Letter No. 14,
Continued**

Mr. Richard Kite
July 7, 2010
Page 3

storage tanks, this Department's Environmental Programs Division must be contacted for required approvals and operating permits.

2. Geotechnical and Materials Engineering

The proposed project will not have significant environmental effects from a geology and soils standpoint, provided the appropriate ordinances and codes are followed. Portions of the project are located within mapped potentially liquefiable areas, per the State of California Seismic Hazard Zone Map, Ritter Ridge Quadrangle. However, a liquefaction analysis is not warranted at this time. Detailed liquefaction analyses, conforming to the requirements of the California Geological Survey Special Publication 117A, must be conducted at the tentative map and/or grading/building plan stages.

3. Building and Safety

- a. Grading activities associated with this project shall not alter the flow characteristics of Anaverde Creek and shall be in compliance with the National Flood Insurance Program requirements regarding work within the Special Flood Hazard Zone.
- b. Prevent adverse impact on adjacent properties caused by changes in the natural drainage condition.
- c. Observe slope set back requirements from property lines.
- d. Employ Best Management Practices (BMP) in compliance with National Pollutant Discharge Elimination System requirements.
- e. Employ post construction BMPs to comply with Standard Urban Stormwater Mitigation Plans requirements.
- f. Provide on-site storage of rain runoff to prevent increase in local flooding.
- g. In addition, Project shall comply with the Antelope Valley Air Quality Management District requirements.

Based on the above, we request that the Report be revised as noted and a copy of the Final Report be submitted to this Department.

14-1
Cont'd

**Letter No. 14,
Continued**

Mr. Richard Kite
July 7, 2010
Page 4

14-1
Cont'd

If you have any questions, please contact Ms. Linda Lee of this office at
(626) 458-6973, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

GAIL FARBER
Director of Public Works



PAT PROANO
Assistant Deputy Director
Environmental Programs Division

LL:my
P:\sec\Chiq\LF Bien09

Enc.

cc: Department of Public Health (Cindy Chen)
Department of Regional Planning (Jon Sanabria, Maria Masis)

Response to Letter No. 14
County of Los Angeles, Department of Public Works – July 7, 2010
(Please note this response letter was revised and re-submitted on July 15, 2010.)

Response 14-1

The issues/concerns raised in this letter were repeated and expanded in the July 15, 2010 letter included herein as Letter #16. The responses to all comments raised by County's July 2010 letters are incorporated within Comment Letter #16 responses, below.

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Letter No. 15



ARNOLD SCHWARZENEGGER
GOVERNOR

July 8, 2010

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

RECEIVED
JUL 14 2010
PLANNING DEPARTMENT

Richard Kite
City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550

Subject: Antelope Valley Public Landfill Expansion
SCH#: 1990010988

Dear Richard Kite:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 7, 2010, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

15-1

"A responsible 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. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

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 the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Acting Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Letter No. 15,
Continued**

**Document Details Report
State Clearinghouse Data Base**

SCH# 1990010988
Project Title Antelope Valley Public Landfill Expansion
Lead Agency Palmdale, City of

Type EIR Draft EIR
Description NOTE: Amendment

The applicant is applying for certain modifications to the existing Conditional Use Permit (CUP) issued by Los Angeles County. The primary modifications sought are: 1) to enlarge the approved 114-acre refuse footprint by approximately 11 acres in order to reconfigure the two landfills into one contiguous disposal area and increase landfill capacity by approximately 14 million cubic yards; 2) update the overall area of the facility to 185 acres (adding 5 acres of ancillary facilities and other landfill property to the existing 180-acre area; 3) modify other certain physical and operational aspects of the landfill; and 4) obtain a single Conditional Use Permit entitlement by the City of Palmdale for the entire facility.

Lead Agency Contact

Name Richard Kite
Agency City of Palmdale
Phone (661) 267-5200
email
Address 38250 Sierra Highway
City Palmdale
State CA **Zip** 93550
Fax

Project Location

County Los Angeles
City Palmdale
Region
Lat / Long 34° 34' 10" N / 118° 09' 11" W
Cross Streets Tierra Subida / City Ranch Road
Parcel No. 3004-013-009, 010, 011
Township 6N **Range** 12W **Section** 33 **Base** SBB&M

Proximity to:

Highways SR-14
Airports
Railways
Waterways Anaverde Creek, California Aqueduct
Schools Palmdale School District
Land Use Uninhabited land either used or permitted for solid waste disposal / PF-Landfill (Public Facility Landfill) / PF (Public Facility)

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Landuse; Noise; Public Services; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Bd., Region 6 (Victorville); Department of Toxic Substances Control; Native American Heritage Commission

Date Received 05/24/2010 **Start of Review** 05/24/2010 **End of Review** 07/07/2010

Note: Blanks in data fields result from insufficient information provided by lead agency.

Response to Letter No. 15
State of California, Governor's Office of Planning and Research,
State Clearinghouse and Planning Unit – July 8, 2010

Response 15-1

The comment is acknowledged, but does not raise an issue regarding the environmental analysis contained in the Amendment to the Draft EIR; therefore, no response is warranted.

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Letter No. 16



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

July 15, 2010

IN REPLY PLEASE
REFER TO FILE: **EP-5**

Mr. Richard Kite
Assistant Director of Planning
City of Palmdale Planning Department
38250 North Sierra Highway
Palmdale, CA 93550-4609

Dear Mr. Kite:

**ANTELOPE VALLEY PUBLIC LANDFILL
AMENDMENT TO DRAFT ENVIRONMENTAL IMPACT REPORT
CONDITIONAL USE PERMIT NO. 98-12, CITY OF PALMDALE**

Thank you for extending the deadline of the comment period to July 15, 2010, to allow us to add more comments to our letter dated July 7, 2010. For ease of reading, we have included the additions as well as the original comments in this letter.

16-1

The proposed project consists of the following main components: 1) reconfigure the existing Landfill I and Landfill II into one contiguous disposal area, thereby increasing the disposal area from the existing aggregate of 114 acres to 125 acres; 2) increase the permitted intake of refuse from 1,800 tons per day (tpd) to 3,600 tpd; 3) increase the total intake of refuse and beneficial use materials, including alternative daily cover, from 3,564 tpd to 5,548 tpd; and 4) construct additional ancillary facilities, including a recycling drop-off/transfer center. As part of this new proposal, the existing County-approved Conditional Use Permit (CUP) would be replaced by a City of Palmdale CUP since the City of Palmdale annexed on November 21, 2003, the portion of the Landfill that was previously located in a County unincorporated area.

16-2

We have reviewed the Amendment to the Draft Environmental Impact Report (Report), dated May 2010, as required by CUP No. 98-12, and have the following comments:

1. Environmental Programs
 - a. The proposed expansion will require a Finding of Conformance (FOC) from the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force in accordance with the requirement of the Los Angeles County Countywide Siting Element (CSE). The CSE was approved by the majority of the cities containing the majority of the population in the

NOTE: 2009 Solid Waste Disposal Summary Reports by Facilities attachment is included in Appendix D of this document.

**Letter No. 16,
Continued**

Mr. Richard Kite
July 15, 2010
Page 2

- | | | |
|----------------|----|---|
| 16-2
Cont'd | b. | County, as well as by the County of Los Angeles Board of Supervisors, and CalRecycle. |
| 16-3 | b. | In Table 2-2 NOP Comment Letters and Issues Raised, on page 2-8, the Report indicates that Section 3.0 contains a discussion on how Antelope Valley Public Landfill (AVPL) meets the criteria set forth in the CSE. However, such a discussion was not found in the referenced section. Please provide clarification or revise the Report to include a discussion on how the proposed project will meet each of the Disposal Facility Siting Criteria listed in Chapter 6, Volume 1, and Appendix 6-1, Volume 3, of the CSE. (Refer to our comment letter dated January 26, 2006.) |
| 16-4 | c. | In Table 4.7-1A, Existing/Project Daily Traffic Generation Summary, page 4.7-2, the assumed traffic originating from Palmdale is assumed to be approximately 85 percent, while the projection for traffic from outside of Palmdale is 15 percent. According to the disposal reporting information Waste Management submitted to this Department, the 2009 data show that only 36 percent of all disposed waste originated from Palmdale (see enclosed). In other words, 64 percent of waste originated from outside of Palmdale and Antelope Valley area. Please revise the traffic and air quality analyses according to this distribution and evaluate the potential traffic increase on the SR-14 and I-5. |
| 16-5 | d. | In Table 1-1 Project Impact Summary, page 1-34, the proposed project does not provide any mitigation measure to reduce the traffic and air quality impact on SR-14 and I-5. Given about 2/3 of waste originates from outside of Palmdale and Antelope Valley area as discussed in 1.c above, the Report should be revised to evaluate the environmental impacts associated with trucking of waste from the Los Angeles metro area to the Antelope Valley area. Additionally, the Report should include mitigation measures to minimize or reduce truck traffic on SR-14 and I-5 for waste originating from outside the Antelope Valley area. Such mitigation measures to be considered should include, but not be limited to: 1) establishing a haul route and restricted hours of travel; 2) minimizing the number of vehicles by restricting the waste to pre-processed residual waste; 3) establishing a wasteshed or defined boundary where waste originates; and 4) imposition of a surcharge for all waste originating from outside the Antelope Valley area. |

**Letter No. 16,
Continued**

Mr. Richard Kite
July 15, 2010
Page 3

- | | |
|------|--|
| 16-6 | <p>e. In Traffic and Circulation Section, page 4.7-1, it is unclear whether the existing traffic analysis includes traffic associated with the Antelope Valley Environmental Collection Center, an on-site household hazardous waste collection facility. If not, please revise to include a discussion and appropriate traffic and air quality analyses relating to this use.</p> |
| 16-7 | <p>f. Section 1.0, page 1-7, states there will be a proposed construction of ancillary facilities, one of which is a recycling drop-off/transfer center. The Report does not clearly describe the facility and the activities that will take place. The Report should be revised to include a discussion on the proposed activities, the proposed daily tonnage to be received by the center, and associated traffic and air quality impacts. If the facility qualifies or becomes a Transfer/Processing Facility as defined under State regulations, the facility may require an amendment to the City of Palmdale's Nondisposal Facility Element pursuant to Section 50001(a)(2) of the California Public Resources Code.</p> |
| 16-8 | <p>g. Should any operation within the subject project include the construction, installation, modification, or removal of underground storage tanks, this Department's Environmental Programs Division must be contacted for required approvals and operating permits.</p> |
| 16-9 | <p>2. <u>Traffic and Lighting</u></p> <p>In Section 4.7 Traffic and Circulation, starting page 4.7-1, the discussions do not define the routes that will be utilized by the hauling trucks. Based on our experience with landfills in the unincorporated County areas, a defined haul route will enable the affected local agencies to establish conditions to monitor the integrity of the pavement structure given the additional traffic and require the landfill operator to remediate the haul route as necessary. A defined haul route will also allow the affected agencies to manage traffic circulation in the vicinity of sensitive traffic receivers. Please revise the Report to include all possible defined haul routes available to the proposed project. In addition, the defined haul routes should include an analysis of alternatives that restrict the use of the intersection of Tierra Subida Avenue and Palmdale Boulevard.</p> |

**Letter No. 16,
Continued**

Mr. Richard Kite
July 15, 2010
Page 4

16-10

3. Geotechnical and Materials Engineering

The proposed project will not have significant environmental effects from a geology and soils standpoint, provided the appropriate ordinances and codes are followed. Portions of the project are located within mapped potentially liquefiable areas, per the State of California Seismic Hazard Zone Map, Ritter Ridge Quadrangle. However, a liquefaction analysis is not warranted at this time. Detailed liquefaction analyses, conforming to the requirements of the California Geological Survey Special Publication 117A, must be conducted at the tentative map and/or grading/building plan stages.

16-11

4. Building and Safety

- a. Grading activities associated with this project shall not alter the flow characteristics of Anaverde Creek and shall be in compliance with the National Flood Insurance Program requirements regarding work within the Special Flood Hazard Zone.
- b. Prevent adverse impact on adjacent properties caused by changes in the natural drainage condition.
- c. Observe slope set back requirements from property lines.
- d. Employ Best Management Practices in compliance with National Pollutant Discharge Elimination System requirements.
- e. Employ post construction Best Management Practices to comply with Standard Urban Stormwater Mitigation Plans requirements.
- f. Provide on-site storage of rain runoff to prevent increase in local flooding.
- g. In addition, Project shall comply with the Antelope Valley Air Quality Management District requirements.

**Letter No. 16,
Continued**

Mr. Richard Kite
July 15, 2010
Page 5

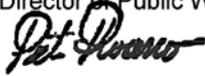
16-12

Based on the above, we request that the Report be revised as noted and a copy of the Final Report be submitted to this Department.

If you have any questions, please contact Ms. Linda Lee of this office at (626) 458-6973, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

GAIL FARBER
Director of Public Works



PAT PROANO
Assistant Deputy Director
Environmental Programs Division

LL:my
P:\sec\AVL EIR addcom

Enc.

cc: Department of Public Health (Cindy Chen)
Department of Regional Planning (Jon Sanabria, Maria Masis)

Response to Letter No. 16**County of Los Angeles, Department of Public Works – July 15, 2010****[Please note the responses below also address the comments raised in the July 7, 2010 letter by the Department of Public Works (Letter #14).]****Response 16-1**

The comment is acknowledged, but does not raise an issue regarding the environmental analysis contained in the Amendment to the Draft EIR; therefore, no response is warranted.

Response 16-2

As stated in Response 8-2 in Section 2.0 of this Final EIR, a Finding of Conformance (FOC) was confirmed in 1995 for the AVPL. The proposed “expansion” would combine the existing two landfill modules of the AVPL by bridging a small 11-acre gap which currently exists between the two permitted sites within the same property boundary. Table 2-1 – “List of Potential Responsible Agencies/Project Approvals” has been modified to include the County Solid Waste Management Committee/Integrated Waste Management Board should a second Finding of Conformance be required. Please refer to the Errata contained in Section 3.0 of this Final EIR.

Response 16-3

As stated in Response 8-3 in Section 2.0 of this Final EIR, the proposed AVPL expansion serves to fulfill the County’s Disposal Facility Siting criteria by adding more landfill capacity and extending the life (beyond 15 years) of a site that previously received a FOC approved April 20, 1995. Table 3-2 of the Amendment to the Draft EIR illustrates the site life/remaining capacity with and without the proposed project.

Response 16-4

Based on the commentor’s 2009 Solid Waste Disposal Summary Reports by Facilities included in Appendix D of this document, the commentor asserts that only 36 percent of all disposal AVPL waste originated from Palmdale and the Antelope Valley area. In other words, they conclude that 64 percent of waste originated from outside of Palmdale and the Antelope Valley area.

Please refer to the table below which show the actual percentages of the total Antelope Valley (AV) tonnages received at the AVPL during 2005 (baseline), 2009 (County attachment to comment letter) and 1st quarter 2010 (current).

**Table 3-2
Antelope Valley Public Landfill Solid Waste Disposal Summary**

	City of Palmdale Tons	City of Lancaster Tons	AV LA County Unincorporated Tons	Total AV Local Area Tons*	Total Tons	% Outside AV Area Waste**	% AV Local Area Waste***
2005	145,379.00	20,565.00	74,040.00	239,984.00	370,799.00	35%	65%
2009	95,850.36	18,111.28	55,137.29	169,098.93	266,742.98	36%	64%
1 st Q 2010	17,792.22	1,949.83	12,175.79	31,917.84	43,177.05	26%	74%
* Includes Palmdale, Lancaster, and Unincorporated Antelope Valley Area Tons ** % Outside AV Area Waste = [(Total Tons-Total AV Area Tons) / Total Tons] x 100 *** % AV Area Waste = (Total AV Area Tons / Total Tons) x 100							

Table 3-1 breaks down the Los Angeles County unincorporated area tonnages specific to those originating from the “Antelope Valley.” The commentor’s 2009 analysis combined all the County tonnages into one category and considered it to be waste originating “outside” of the Antelope Valley (64 percent out of area). They did not consider the Lancaster or Antelope Valley Unincorporated tonnages to be part of the total Antelope Valley area tonnages. Above Table 3-1 includes Palmdale, Lancaster, and Unincorporated Antelope Valley area tons, classified as AV Area Tons, and correctly calculates the percentage of “outside” Antelope Valley waste. The commentor’s 36 percent (2009 data) incorrectly included only the City of Palmdale tonnages as the total Antelope Valley area tonnage.

Page 4.7-7 and Figure 4.7-5 of the Amendment to the Draft EIR describe in detail the existing and future landfill traffic distribution. As indicated in the EIR, the 85 percent local roadway traffic was estimated based upon previously approved traffic studies for the landfill and the field distribution and operations conducted in 2005 (Draft EIR baseline). The results of the traffic impact analysis for SR-14 (please refer to response 7-1 within Section 2.0 and response 16-5 below) indicate that a 15 to 20 percent change in the distribution would not have a measurable effect on the impact analysis conclusions, even if such change was a reasonably foreseeable result of the proposed project, which it is not.

Response 16-5

Based upon the above response 16-4 including Table 3-1, the actual distribution percentages are in line with what was assumed in the EIR. Specifically, Section 4.7 of the Amendment to the Draft EIR concludes, “The SR 14 south of Avenue S has 70,000 vehicles per day per the latest available Caltrans counts, and the added project vehicles represents about a 0.14 percent increase which is insignificant. Per the Los Angeles Congestion Management Program (LACMP) section D.4, 150 added vehicles in the peak hour is considered a significant impact

and would trigger future traffic impact analysis. As stated above, the proposed project would add far less than 150 vehicles for the entire day and the project peak hour trips on SR-14 would be even less than the daily figure. Therefore, while the operator will most likely avoid peak commute periods on state highways and excessive or poorly times truck platooning (caravans of trucks), the EIR conclusions do not support a finding of significant adverse impacts to SR-15 or I-5 for which additional mitigation may be required as proposed. This is especially true if the City decides to adopt the Reduced Alternative since there would be no increase over existing permitted levels of operation.

The proposed project, moreover, will not result in an overall increase in the number of refuse related truck trips, and related air emissions from those trips, in the region. Those truck trips are already occurring as part of the existing environmental setting and are expected to continue whether or not the proposed project is approved. The proposed project, by nature, will not cause more refuse to be created.

Response 16-6

Please refer to page 2-6 of the Amendment to the Draft EIR which indicates that the City of Palmdale adopted a Mitigated Negative Declaration in July 2004 for this joint City/County project. The Antelope Valley Environmental Collection Center was included within the September 2005 Traffic Impact Analysis prepared by Kunzman Associates.

Response 16-7

A recycling/drop-off transfer facility is not reasonably foreseeable at this time as the volume of recyclables has dropped given the current market conditions, and no specific information exists as to what levels of operation such a facility would include, the ingress/egress routes or other details. In addition, all of the recyclables currently brought to AVPL are transferred to Lancaster Landfill which has sufficient capacity to handle. It would therefore be speculative to analyze the specific potential impacts of such a facility. No application or other information of this facility has been submitted to the City, and when detailed plans become available, required building permits and CEQA analysis and clearances will be obtained at that time.

Response 16-8

As stated in Response 8-1 in Section 2.0 of this Final EIR, the Environmental Program Division will be contacted for required permit approval and operating permits should the project include the construction, modification, or removal of underground storage tanks and/or Industrial Waste Control System/ facility.

Response 16-9

The traffic analysis summarized within Section 4.7 was prepared with detailed input from the City of Palmdale. Comments made in responses to the March 1, 2004 NOP were also addressed in the traffic and environmental analysis. Furthermore, Figure 4.7-5 depicts the

general traffic distribution and rate used by landfill hauler. Requiring a defined haul route for all trucks within the City is beyond the scope of this proposed project. The City could, however, adopt an ordinance establishing designated truck routes to apply equally to all trucks should it desire.

Please also note that the proposed project has not been altered since the initial County of Los Angeles Department of Public Works' review of the Draft EIR in 2006. The original Los Angeles Department of Public Works' January 26, 2006 comments are included beginning on page 2-32 of Section 2.0 of this document. Los Angeles Department of Public Works' Comment 8-5 indicates,

"We generally agree with the study that the traffic generated by the project alone, or the cumulative traffic generated by the project and other related projects will not significantly impact the County and County/City intersections in the area. We also agree with the impact the County and County/City intersections in the area. We also agree with the study that the project will not have significant impacts to the Congestion Management Program monitored intersections, arterials, or freeways."

The traffic ICU analysis concludes that

"For existing plus project traffic conditions, the intersections in the vicinity of the site are projected to continue to operate at LOS B or better during the peak hours. No significant project traffic impacts are anticipated."

Response 16-10

The comment is acknowledged. When, if ever, a plan for a recycling drop-off/transfer center facility becomes available, liquefaction analyses consistent with the requirements of the California Geological Survey Special Publication 117A would be conducted as part of any future building permit. There are no tentative maps at issue as part of this project.

Response 16-11

The Amendment to the Draft EIR addresses each of the Building and Safety issues within Sections 4.1, 4.2, 4.3, and 4.4. Mitigation measures are included to address each item listed in this comment.

As stated in response 9-4, in Section 2.0 of this Final EIR, "The Draft EIR provides a detailed analysis of the potential surface water quality impacts and the measures that will be implemented to prevent potential impacts to the sediment load of the Anaverde Creek. Pages 3-15 through 3-19 (including Figure 3-6) discuss the project's proposed Drainage Control and Surface Water Management System. Additionally, pages 4.3-14 and 4.3-15 and Figure 4.3-4 outline the project's Stormwater Management Plan and Erosion Control Measures to be implemented for stormwater runoff prior to discharge to the Anaverde Creek. Lastly, Section 4.4 of the Draft EIR also addresses this issue. Mitigation Measure 4.4-3 states, "Prior to issuance

of the landfill's Waste Discharge Requirements (WDRs), the project engineer shall finalize erosion and siltation control plans and other BMPs, as necessary to prevent graded and cleared areas from being eroded, resulting in the transport of sediment downstream to Anaverde Creek."

Response 16-12

The comment is acknowledged. When available, a copy of the Final EIR will be provided to the Department.

Letter No. 17



JONATHAN E. FIELDING, M.D., M.P.H.
Director and Health Officer

JONATHAN E. FREEDMAN
Chief Deputy Director

ANGELO J. BELLOMO, REHS
Director of Environmental Health

ALFONSO MEDINA, REHS
Director of Environmental Protection Bureau

Solid Waste Program
Cindy Chen, Chief, REHS
5050 Commerce Drive
Baldwin Park, California 91706
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August 5, 2010

Mr. Richard Kite
Assistant Director of Planning
City of Palmdale Planning Department
38250 North Sierra Highway
Palmdale, CA 93550-4609

Dear Mr. Kite:

ANTELOPE VALLEY PUBLIC LANDFILL (AVPLF) CUP AMENDMENT TO DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) - (SCH # 1990010988)

The County of Los Angeles Solid Waste Management Program, acting as the Local Enforcement Agency (LEA), has reviewed the amendment to the DEIR for AVPLF. The LEA is submitting the following comments based on its review of the aforementioned DEIR.

- 17-1
- 1. No Appendices were provided in the electronic version of the DEIR that was provided to the LEA.
- 17-2
- 2. The DEIR does not identify Waste Management's waste hauling and collection operation whose facilities are located within the permitted boundary of the landfill.

**Letter No. 17,
Continued**

Mr. Richard Kite
August 5, 2010
Page 2

17-3

3. The updated traffic studies does not include the waste hauling and collection operation which includes residential and commercial waste collection trucks and support vehicles that service the Antelope Valley region. The following potential impacts should be evaluated and included as part of this report:

17-4

a. It is not clear if the potential impact on air quality of the waste collection operation was evaluated.

17-5

4. Provide a clear description of the proposed recycling drop-off/transfer activities. Section 1.1.2, pages 1-6 and 1-7 states there will be a proposed construction of ancillary facilities, one of which is the recycling drop-off/transfer center. The description should include the proposed daily tonnage. Additionally it is not clear if associated traffic, noise, and air quality impacts as a result of this proposed facility were analyzed for.

17-6

5. How will this activity impact the parking of vehicles utilized in the waste hauling operation which is located in proximity to the proposed recycling drop-off/transfer activities?

17-7

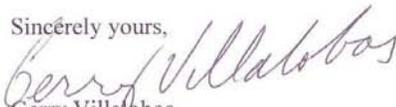
6. What measures will be implemented to prevent the tracking of soil by vehicles utilizing the facility onto public streets. Measures for the removal of fugitive soils tracked offsite should be incorporated into this DEIR.

17-8

The LEA requests that revisions to the DEIR and a copy of any future DEIR revisions and the Final Report be submitted to this department.

If you have any questions please contact Mark Como at (626) 430- 5540.

Sincerely yours,



Gerry Villalobos
Environmental Health Specialist IV

cc: Maria Masis, Los Angeles County Department of Regional Plannin
Pat Porano, Los Angeles Department of Public Works
Jane Chang, EDAW/AECOM

Response to Letter No. 17
County of Los Angeles, Public Health – August 5, 2010

Response 17-1

It is unclear why the Technical Appendices Volume I and Volume II were not included on the CD provided to the LEA and we apologize for the mix up. Over 60 CDs were created and distributed to various agencies with the electronic version of the May 2010 Amendment to the Draft EIR. The technical appendices were contained as separate PDF file on the same CD as the May 2010 Amendment to the Draft EIR. The technical appendices were also posted on the City's website for review during the 45-day review period from May 24, 2010 to July 7, 2010.

Response 17-2

Please refer to Figure 1-5, Ancillary Facility Layout Plan, of the Amendment to the Draft EIR, which depicts the waste hauling and collection operation facilities located within the permitted boundary of the landfill. The trucks are parked around the maintenance and equipment bin storage south of the existing maintenance building.

Response 17-3

The waste hauling and collection operating trucks have been included within the existing counts and future project impact analysis included in Section 4.7 of the Amendment to the Draft EIR and the Kunzman Associates' traffic tables.

Please refer to Section 4.7, Traffic and Circulation of the Amendment to the Draft EIR (pages 4.7-6 and Table 4.7-3 which include an analysis of the existing truck traffic). Page 4.7-6 states that,

“Table 4.7-3 shows actual existing count data on tons per loads and tons per day as well as truck loads in and total trips. Appendix G contains count data for total tonnage and truckloads collected on an hourly basis as well as peak hour and daily in and out volumes.”

Page 4.7-6 continues,

“there are an average 208 loads per day and 1,372 tpd of deposited material. These 208 loads consist of 142 municipal solid waste loads, pick ups, roll ups, packers, 16 transfer trailer loads, 17 petroleum contaminated soil loads, 23 greenwaste loads, and 10 beneficial use loads. WMI trucks currently average 4.05 tons each for municipal solid waste, 21 tons each for transfer trailers, 25 tons each for petroleum contaminated soil, 0.7 tons each for greenwaste, and average of 8 tons each for others.”

Also, please refer to Section 4.7.4, which includes the analysis of future project related traffic. As stated on page 4.7-13,

“trip generation rates were determined for daily traffic, morning peak hour inbound and outbound traffic, and evening peak hour inbound and outbound traffic for the proposed land use. Table 4.7-4 shows actual projected data for future truck loads and tonnages as well as the expected change in the existing and future operation. Table 4.7-5 exhibits the traffic generation rates, project peak hour volumes, and project daily traffic volumes.”

Response 17-4

Please refer to Section 4.2 (pages 4.2-18 to 4.2-21 of the Amendment to the Draft EIR) which includes an analysis of the potential air quality impact from the waste collection operation. Table 4.2-4B provides a comparison of landfill truck hauling emissions and impacts.

Response 17-5

Plans for a recycling/drop-off transfer facility are not known at this time nor have any submittals been made to any agency. Therefore, it would be speculative to analyze the potential effects of such a facility. When detailed plans become available, required building permits and CEQA analysis and clearances will be obtained at that time.

Response 17-6

As shown on Figure 1-5 of the Amendment to the Draft EIR, such a facility, if ever proposed, is not expected to impact the truck parking as it would most likely be considered to be located to the southeast of the future facility.

Response 17-7

WMI currently employs measures as part of its existing landfill operations to prevent the tracking of soil by vehicles utilizing the site on to public streets. These measures include a rumble grate located before the outbound scales to collect excess soils and weekly street sweeping along the landfill access road. Proposed air quality mitigation measures 4.2-2 and 4.2-3 and traffic mitigation measure 4.7-1 will also assist with the reduction and removal of fugitive dust and offsite tracking potential.

Response 17-8

When available, a copy of the Final EIR, which would include any revisions to the Amendment to the Draft EIR, will be submitted to the Department.

Letter No. 18



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

August 11, 2010

Richard Kite, Assistant Director
City of Palmdale Planning Department
38250 North Sierra Highway
Palmdale, CA 93550

RECEIVED
AUG 16 2010
PLANNING DEPARTMENT

Dear Mr. Kite:

**NOTICE OF AVAILABILITY FOR THE PUBLIC REVIEW OF THE DRAFT ENVIRONMENTAL
IMPACT REPORT (EIR) AMENDMENT (SCH #1990110988), PALMDALE
(FFER #201000104)**

18-1

The Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. We have not comments at this time.

18-2

LAND DEVELOPMENT UNIT:

1. The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project. At this time, the Land Development Unit does not have additional comments for the proposed CUP. Additional access and water system requirements will be addressed with further submittal of plans to the Fire Department. The building plans shall be submitted to the Lancaster Fire Prevention office, located at 335-A Avenue K-6 in Lancaster for review.

18-3

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division includes erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CEDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWSDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENDORA	IRVINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA-HENTRIDGE	LYNSWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
			LA HABRA				WHITTIER

**Letter No. 18,
Continued**

18-3
Cont'd

Richard Kite, Assistant Director
August 11, 2010
Page 2

2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

18-4

1. The Health Hazardous Materials Division has no jurisdiction on landfills. The Regional Water Quality Control Board and the Los Angeles County Department of Public Health, Solid Waste Program have jurisdiction over landfill activities. The Draft EIR should be reviewed by those agencies.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:ss

Response to Letter No. 18
County of Los Angeles, Fire Department – August 11, 2010

Response 18-1

The comment is acknowledged, but does not raise an issue regarding the environmental analysis contained in the Amendment to the Draft EIR; therefore, no response is warranted.

Response 18-2

The comment is acknowledged, but does not raise an issue regarding the environmental analysis contained in the Amendment to the Draft EIR; therefore, no response is warranted.

Response 18-3

The comment is acknowledged, but does not raise an issue regarding the environmental analysis contained in the Amendment to the Draft EIR; therefore, no response is warranted.

Response 18-4

The comment is acknowledged. Both agencies did review/comment on the Amendment to the Draft EIR. Please refer to response letter No. 13 Regional Water Quality Control Board and letter No. 17 Los Angeles County Department of Public Health, Solid waste Program for their comments.

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4.0 CHANGES TO THE DECEMBER 2005 DRAFT EIR AND MAY 2010 AMENDMENT TO THE DRAFT EIR

4.1 INTRODUCTION

The text revisions and modifications included in this section have resulted from the comments on the Draft EIR and Amendment to the Draft EIR during the 45-day public review periods (December 14, 2006 through January 27, 2006 and May 24, 2010 through July 7, 2010, respectively). In some instances, recommendations and questions raised in the comments have necessitated revisions to the Draft EIR and Amendment to the Draft EIR text. Where appropriate, the response directs readers to a specific page or pages in the Draft EIR and Amendment to the Draft EIR. Changes made to the Draft EIR and Amendment to the Draft EIR text in response to comments are indicated in ~~strikeout~~ (deletion) and underlined (addition) text. The errata pages/exhibit(s), starting in Section 4.2, reflect these changes and modifications to the Draft EIR and Section 4.3 for Amendment to the Draft EIR.

The changes to the original text, which consists of completeness or accuracy edits, are being corrected at this time through errata as well. The changes to the Draft EIR and Amendment to the Draft EIR as they related to issues contained within this section do not affect the overall conclusions of the environmental document relative to significance of impacts.

4.2 DECEMBER 2005 DRAFT EIR ERRATA PAGES

In response to correcting a typographical error, paragraph within Impact 4.3-4 in Section 1.0, Table 1-1, page 1-18 is revised as follows:

Implementation of project design measures / components (i.e., Leachate Collection and Removal System, Composite Liner System and Groundwater Monitoring System), developed consistent with Title 27 and NPDES requirements, will reduce the potential groundwater quality impacts, ~~including potential permeability impacts~~ to less than significant levels.

In response to comment 8-2 (Letter 8, County of Los Angeles, Department of Public Works, Donald L. Wolfe – January 26, 2006), Table 2-1 – “List of Potential Responsible Agencies/Project Approvals” has been modified to include the County Solid Waste Management Committee/Integrated Waste Management Board should a second Finding of Conformance be required.

In response to comment 9-2 (Letter 9, California Regional Water Quality Control Board, Lahontan Region, January 27, 2006), page 4.1-10 in Section 4.1, Earth Resources of the Draft

EIR has been modified to correctly reflect the information shown on Figure 4.1-1. The modified page 4.1-10 is included in this section of the Final EIR.

Mapping by the State of California (Bryant et al., 2002; California Geological Survey, 2003) indicates that the Alquist-Priolo Earthquake Fault Zone (AP Zone) is within the southwestern part and adjacent to the northeastern boundary of the AVPL site (**Figure 4.1-1**, Geology and Fault Zones). An AP Zone is a regulatory zone delineated by the State Geologist (Chief of the California Geological Survey) where active faults may pose a surface rupture hazard for structures for human occupancy built within the zone. ~~No AP Zone is present within the 11-acre expansion area.~~

In response to comment 9-3 (Letter 9, California Regional Water Quality Control Board, Lahontan Region, January 27, 2006), Mitigation Measure 4.1-1 in Section 1.0, Table 1-1, page 1-12; Section 4.1, page 4.1-14; and Section 8.0, page 8-5 of the Draft EIR is revised as follows:

Prior to the issuance of the Waste Discharge Requirements (WDR's) and approval of the Joint Technical Document (JTD) for the project by the Lahontan Regional Water Quality Control Board, the proposed design and supporting engineering analysis of the landfill's containment structures shall be reviewed and approved by the RWQCB to ensure the design complies with State regulations pursuant to California Code of Regulations, Title 27, Division 2. The applicant shall demonstrate to RWQCB satisfaction that the landfill liner and leachate collection system have been designed to preclude failure and will resist the maximum seismic shaking expected at the site based on risk assessment. Further, the design shall demonstrate that the final slopes will be stable under both static and dynamic conditions to protect public health and safety and prevent damage to the facility such that no significant impact to the environment will occur. The liner design, as proposed in Appendix B of the EIR, shall be modified or refined if necessary based on final engineering analysis and review by the RWQCB to ensure that the approved landfill design will mitigate impacts to a less than significant level.

The landfill containment structures shall be constructed as approved by the RWQCB. During on-going landfill construction, Ggeologic mapping of rock and soil exposed in future excavations shall be completed—during ongoing landfill construction. Information on rock type and any exposed folds, fractures and folds will be collected. Permanent cut slopes shall be observed by a qualified geologist to check for adverse bedding, joint patterns, or other geologic features that may impact the approved landfill design. Where necessary, the permanent cut slopes shall be constructed to ensure their stability. The geologic maps will be included with the construction reports for each portion of the constructed landfill. The reports will be submitted to the LEA and Lahontan RWQCB.

In response to correcting a typographical error, Mitigation Measure 4.2-4 in Section 1.0, Table 1-1, page 1-17; Section 4.2, page 4.2-22; and Section 8.0, page 8-6 of the Draft EIR is revised as follows:

If an odor nuisance problem should develop, appropriate control measures shall be employed such as applying additional cover material or more frequent application of the cover material to seal the surface, or adjustments to the ~~vacuum pressure on wells, or disposal equipment~~ landfill gas collection system.

In response to comment 9-6 (Letter 9, California Regional Water Quality Control Board, Lahontan Region, January 27, 2006), the following revision has occurred to the text on page 4.3-12 to correct the sentence.

Final design of scour protection must comply with the requirements of the City of Palmdale and California Department of Fish and Game, if applicable, ~~requirements~~ as well as maintain some flexibility given the proximity to geologic faulting.

In response to correcting a typographical error, Impact 4.3-4 in Section 1.0, Table 1-1, page 1-18 and Section 4.3, page 4.3-19 of the Draft EIR is revised as follows:

Impact 4.3-4 Potential for groundwater quality impacts, ~~including permeability~~.

In response to correcting a typographical error, second paragraph in Section 4.3, page 4.3-21 of the Draft EIR is revised as follows:

Project design measures / components (i.e., Leachate Collection and Removal System, Composite Liner System and Groundwater Monitoring System), developed consistent with Title 27 and NPDES requirements shall be implemented so that the potential groundwater quality impacts, ~~including potential permeability impacts~~ are less than significant.

In response to correcting a typographical error, last paragraph in Section 4.3, page 4.3-21 of the Draft EIR is revised as follows:

Implementation / construction of the proposed SMP as depicted on **Figure 3-4**, Stormwater Management Plan and the proposed SWCP depicted on **Figure 4.3-4**, Post-Development Surface Water Control Plan will reduce potential runoff and surface water quality impacts to less than significant levels. As concluded in the 1992 certified EIR for Landfill II, the proposed project will not alter the groundwater level and no significant impacts to groundwater fluctuation are anticipated. With the implementation of project design measures / components (i.e., Leachate Collection and Removal System, Composite Liner System and Groundwater Monitoring System) the potential groundwater quality ~~including potential permeability impacts~~ will be reduced to less than significant levels.

In response to correcting a typographical error, Mitigation Measure 4.6-4 in Section 1.0, Table 1-1, page 1-25; Section 4.6, page 4.6-8; and Section 8.0, page 8-9 of the Draft EIR is revised as follows:

During landfill operations and after construction activities, personnel ~~members~~ shall conduct periodic litter cleanup along, 1) the access roadway (R-5 access) and adjacent land from the scales to Tierra Subida Avenue and 2) ~~adjacent~~ properties adjacent to the landfill. The goal is to ensure that stray litter (including litter that is illegally dumped along the landfill access road) is immediately removed when strong winds occur.

In response to correcting a typographical error, third bulleted item in Section 8.0, page 8-4 is revised as follows:

- Hydrology and Water Quality
 - Post development flows during flooding events (project specific)
 - Erosion at the north bank of the Anaverde Creek (project specific)
 - Contamination of the Anaverde Creek and surface water quality (project specific)
 - Groundwater quality impacts ~~and permeability~~ (project specific)
 - Regional flooding (cumulative)
 - Regional water quality (related to runoff, scour) (cumulative)

4.3 MAY 2010 AMENDMENT TO THE DRAFT EIR ERRATA PAGES

In response to correcting a typographical error, Impact 4.4-7 in Section 1.0, Table 1-1, page 1-27 of the Amendment to the Draft EIR is revised as follows:

The project, in conjunction with other cumulative developments in the area, will result in cumulative losses of natural upland desert formations, native vegetation, and habitat values along Anaverde Creek and which may result in the displacement effects to ~~agency-listed~~ CEQA-sensitive songbird and small mammal species.

In response to correcting a typographical error, Mitigation Measure 4.4-6 in Section 1.0, Table 1-1, page 1-27; Section 4.4.6, page 4.4-12; and Section 8.3.2, page 8-9 of the Amendment to the Draft EIR is revised as follows:

~~The final design of the “off site” utility pole placement shall be outside of the bed and bank of the channel to permit free passage by wildlife along the channel.~~

In response to providing clarification for cumulative GHG level of significance conclusion, the first paragraph on page 4.2-28 of the Amendment to the Draft EIR is revised as follows:

The proposed project will not conflict with AB-32 or create potential adverse effects of global warming. The project complies with all existing GHG control requirements for landfills. The 25,000 MT/year proposed mandatory reporting threshold would not be exceeded. It would similarly not cause the 10,000 MT/year threshold of the CARB Market Advisory Committee to be exceeded, and therefore, would not be considered “substantial” in a CEQA sense. Nevertheless, because of the globally cumulative nature of

anthropogenic GHG emissions and suspected global warming, any reasonably available additional control measures should be implemented on a project basis. ~~Implementation of Mitigation Measures 4.2-5 through 4.2-7 would reduce the project's cumulative contribution to GHG/global warming to the extent feasible.~~ With the adoption of the Mitigation Measures 4.2-5 through 4.2-7, the proposed Project is anticipated to result in little, if any, additional GHG emissions. Where a proposed project would add no, or very little, incremental contribution whatever to a significant cumulative impact, the increment cannot be cumulatively considerable. (See CEQA Guidelines, § 15130, subd.(a)(1).) The cumulative contribution of the proposed Project to global climate change is therefore considered less than cumulatively considerable and therefore less than cumulatively significant.

In response to providing clarification for cumulative GHG level of significance conclusion, the fifth paragraph on page 4.2-32 of the Amendment to the Draft EIR is revised as follows:

~~Although GHG/global warming related significant impacts are not anticipated, Mitigation Measures 4.2-5 through 4.2-7 are proposed to reduce the project's cumulative contribution to GHG/global warming to the extent feasible.~~ With the adoption of the above Mitigation Measures 4.2-5 through 4.2-7, the proposed Project is anticipated to result in little, if any, additional GHG emissions. Where a proposed project would add no, or very little incremental contribution whatever to a significant cumulative impact, the increment cannot be cumulatively considerable. (See CEQA Guidelines, § 15130, subd.(a)(1).) The cumulative contribution of the proposed Project to global climate change is therefore considered less than cumulatively considerable and therefore less than cumulatively significant.

In response to providing clarification for GHG mitigation measure, Mitigation Measure 4.2-5 on page 1-19, page 4.2-30, and page 8-7 of the Amendment to the Draft EIR is revised as follows:

The recommended mitigation measures to reduce hauling and disposal related GHG exhaust emissions are:

4.2-5 The applicant project shall include the following set of measures that, working together, will reduce operational greenhouse gas emissions of the project and the project's potential effects on climate change of global warming:

- Hauling trucks shall be powered by liquefied natural gas (LNG), Compressed Natural Gas (CNG) or ultra-low sulfur diesel fuel.
- Idling of heavy-duty hauling trucks in excess of five minutes, and idling of off-road mobile sources of any type in excess of five ten-minutes shall be prohibited.
- When new landfill equipment is purchased by WMI, new commercially available equipment shall be purchased that ~~meets or~~ exceeds California's emission standards in effect at the time of purchase.

- Onsite vehicles and equipment shall be properly maintained by being serviced at least every 90 days and once annually in compliance with Department of Transportation (DOT) requirements.
- Operation equipment used for the proposed project shall use clean alternative (i.e., non-diesel/biodiesel) fuels, or use equipment that has been retro-fitted with diesel particulate reduction traps or equivalent control technology, using equipment certified by CARB. ~~Such equipment is now subject to CARB's new regulation to control PM emissions from off-road diesel engines.~~
- For the purchase of primary heavy duty, diesel powered landfill equipment at AVPL (dozers and compactors), if equipment meeting California's 2014 emission standards for off-highway, heavy duty diesel equipment is commercially available before 2014, WMI shall purchase such equipment as older equipment is replaced.

In response to comment 12-13 (Letter 12, California Clean Energy Committee, July 3, 2010), Mitigation Measure 4.2-6 on page 1-21, page 4.2-30, and page 8-7 of the Amendment to the Draft EIR is revised as follows:

- 4.2-6** Within ~~one-three~~ years of project approval, the applicant shall develop, and submit to the City, a Greenhouse Gas Reduction Plan that demonstrates how the ~~WMI/AVPL~~ will achieve by 2020 a reduction in annual GHG emissions such that emissions are no greater than 10 percent below 2006 levels and will meet or exceed all regulatory requirements related to GHG control. The Reduction Plan shall include one or more of the following measures, or combination thereof:
- Use of alternative fuels, including but not limited to CNG, LNG, B-5 or B-20 Biodiesel in on-site equipment and in heavy duty truck fleets (and as a condition of future contract approvals if third-party haulers are used);
 - Use of hybrid, LNG, CNG or other similarly effective alternative fuel in hauling trucks;
 - Use of Best Available Control Technology and BMPs when designating new waste disposal cells (e.g., by designing any additional gas collectors in bottom liner systems) and to increase gas combustion capacity/improve flare destruction efficiency;
 - ~~Reconsider the feasibility of gas to energy production capacity in the future for use in fueling vehicles, operating equipment or energy conversion~~ Begin the process of developing, for construction and operation, a landfill gas-to-energy (LFGTE) or landfill gas to LNG or CNG plant in the future for use in fueling on- and off-road vehicles, operating equipment or for energy use when: (1) for a LFGTE project, the AVPL generates 1,200 scfm of landfill gas at

50 percent or better methane quality consistently for six months; (2) for LFGTLNG or CNG plant, the AVPL generates 2,500 scfm at 50 percent or better methane quality consistently for six months;

- Increased diversion of organic material from landfill disposal and use as landfill cover material;
- Increased recycling and carbon offsets if available through an adopted program (e.g., the Western Climate Initiative);
- The plan shall include cost estimates for GHG reduction measures and identify funding sources. The plan shall include an implementation schedule that demonstrates substantial GHG emission reductions prior to the 2020 deadline, including implementation of “Early action” measures that may be implemented within three years of plan approval. The plan shall include an updated inventory of projected GHG emissions and an updated estimate of GHG emissions in 1990. The plan shall be subject to review and approval by AVAQMD.
- ~~Increase waste diversion of recyclable materials~~

In response to providing clarification for GHG mitigation measure, Mitigation Measure 4.2-7 on page 1-22, page 4.2-37, and page 8-8 of the Amendment to the Draft EIR is revised as follows:

4.2-7 Following closure of the landfill, the applicant shall continue to operate, maintain, and monitor the landfill gas collection and treatment system as long as the landfill continues to produce landfill gas, or until it is determined by the AVAQMD to ensure that emissions do not significantly contribute to no longer constitute a considerable contribution to additional greenhouse gas emissions, whichever comes first.

In response to comment 13-4 (Letter 13, California Regional Water Quality Control Board, Lahontan Region, July 7, 2010), the paragraph under SURFACE WATER QUALITY in Section 4.3, page 4.3-5 of the Amendment to the Draft EIR is revised as follows:

The Anaverde Creek is the nearest surface drainage/surface water feature to the project site, and according to the Lahontan Region Basin Plan, it is considered minor surface water. Anaverde Creek lies adjacent to the site, but is separated from the proposed landfill use area by several dirt roadways or excavated basins with marginal roadway berms. This reach of the creek is narrow and rocky, with steeply incised banks, both sides of which have been filled or otherwise disturbed for much of its length. Although the creek channel shows signs of seasonal high-water flows, the persistent drought conditions of the past several decades likely have reduced the frequency with which it carries runoff, and there was no evidence of surface water between November, 2003 and May, 2004. As reported in the 1992 certified EIR for Landfill II, samples collected in March 1991 showed TDS concentrations of 258 ppm which is

considered good by the Federal Drinking Water Standards. There is currently construction of residential housing upstream of the proposed project, within the remaining portions of the watershed. There have been little to no changes in the watershed and therefore no changes in the surface water quality would be expected at this time.

In response to comment 13-4 (Letter 13, California Regional Water Quality Control Board, Lahontan Region, July 7, 2010), the last paragraph on page 4.3-12 of the Amendment to the Draft EIR is revised as follows:

As indicated previously, the nearest surface water is Anaverde Creek located approximately 300 feet south-southwest of the active landfill site. The Anaverde Creek is considered a minor surface water in the Lahontan Region Basin Plan. As indicated in the 1992 certified EIR for Landfill II, Anaverde Creek water collected during the March 1991 sampling event showed TDS concentrations of 258 ppm which is considered good quality by the Federal Drinking Water Standards. The Anaverde Creek is an intermittent stream which flows only during peak flood. No evidence of surface water was observed in the reach of the creek south of the Landfill between November 2003 and May 2004. Although no surface water have been observed recently, a “Stormwater Management Plan” has been proposed to prevent contamination of the Anaverde Creek and surface waters. With implementation of “Proposed Stormwater Management Plan” (see **Figures 3-4**, Stormwater Management Plan in Section 3.0 and 4.3-4, Post-Development Surface Water Control Plan) and implementation of the actions described below, no impact to surface water quality are anticipated.

In response to comment 13-4 (Letter 13, California Regional Water Quality Control Board, Lahontan Region, July 7, 2010), the second paragraph on page 4.3-21 of the Amendment to the Draft EIR is revised as follows:

Implementation/construction of the proposed Stormwater Management Plan (SWMP) and Surface Water Control Plan (SWCP) developed consistent with NPDES and the Lahontan Region Basin Plan requirements shall occur so that surface water quality impacts are less than significant.

In response to correcting typographical error, Mitigation Measure 4.4-4 on page 1-26, page 4.4-12, page 8-9 of the Amendment to the Draft EIR is revised as follows:

4.4-4 Landfill expansion actions which directly affect vegetation formations (i.e., initial vegetation cleaning) shall be initiated outside of the timing of the native bird nesting season (mid-April through mid-August) to avoid disturbing active nests, per provisions of the Migratory Bird Treaty Act and California Fish and Game Code. If initial vegetation disturbance and clearing cannot be performed outside of this window of non-breeding activity, then it shall be preceded by a thorough site/pre-construction surveys in coordination with DFG survey for active nests by a qualified biologist; nests found shall be flagged, and a perimeter fence installed at an appropriate distance (usually between 50 and 300 feet from the nest, depending upon species and terrain). No

work shall be performed within the fenced areas until such time as the nests are determined to be inactive and the fledglings have left the area.

In response to correcting a typographical error, Impact 4.4-7 in Section 4.4.5, page 4.4-10 of the Amendment to the Draft EIR is revised as follows:

The project, in conjunction with other cumulative developments in the area, will result in cumulative losses of natural upland desert formations, native vegetation, and habitat values along Anaverde Creek and which may result in the displacement effects to CEQA-sensitive songbird and small mammal species.

In response to correcting typographical error, Mitigation Measure 4.8-1 on page 1-35, page 4.8-4, and page 8-11 of the Amendment to the Draft EIR is revised as follows:

4.8-1 The permittee shall ~~establish and~~ maintain a comprehensive waste load checking program, which shall include the following:

- a. All waste hauling vehicles shall be screened at the scales with a radiation detector device acceptable to the Local Enforcement Agency for the presence of radioactive materials.

In response to correcting typographical error, the second bulleted item on page 8-4 of the Amendment to the Draft EIR is revised as follows:

- Air Quality
 - Short-term construction impacts – PM-10 (project specific)
 - Long-term operational impacts – PM-10 (project specific)
 - Long-term odor (project specific)
 - GHG Emissions (project specific & cumulative)

In response to providing clarification for cumulative GHG level of significance conclusion, the third paragraph on page 5-12 of the Amendment to the Draft EIR is revised as follows:

The 1,800 TPD alternative would not cause the most stringent candidate significance threshold of 10,000 MT/year to be exceeded, and it would not interfere with programs, plans and policies to reduce GHG emissions to mandated levels. The GHG impact of the 1,800 TPD alternative is considered less than significant. The mitigation measure would still be required to reduce the project's contribution to cumulative impact to less than significant.

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5.0 MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

5.1 Introduction

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to State of California Public Resources Code Section 21081.6, which requires adoption of a MMRP for projects in which the Lead Agency has required changes or adopted mitigation to avoid significant environmental effects. The City of Palmdale is the lead agency for the proposed Antelope Valley Public Landfill CUP project and, therefore, responsible for administering and implementing the MMRP. The decision-makers must define specific reporting and/or monitoring requirements to be enforced during project implementation prior to final approval of the proposed project. The primary purpose of the MMRP is to ensure that the mitigation measures identified in the Antelope Valley Public Landfill EIR are implemented to reduce or avoid identified environmental effects.

The purpose of discussing the MMRP in the Final EIR is to reiterate to the reader the mitigation responsibilities of the Lead Agency in implementing the proposed project. The mitigation measures listed in the MMRP are required by law or regulation and will be adopted by the City as the primary project approval. Certain elements of the project will be adopted or approved by other entities, as indicated in the MMRP matrix.

Mitigation is defined by the California Environmental Quality Act (CEQA) as a measure which:

- Avoids the impact altogether by not taking a certain action or parts of an action.
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reduces or eliminates the impact over time by preservation and maintenance activities during the life of the project.
- Compensates for the impacts by replacing or providing substitute resources or environments.

Mitigation measures provided in this MMRP were initially identified in Section 4.0, Environmental Analysis of the Draft EIR, as feasible and effective in mitigating project-related environmental impacts. Some of the mitigation measures are modified as a result of the public review processes.

5.2 Basis for the Mitigation Monitoring and Reporting Program

The legal basis for the development and implementation of the MMRP lies within CEQA (including the California Public Resources Code). Sections 21002 and 21002.1 of the California Public Resources Code state:

- Public agencies are not to approve projects as proposed if there are feasible alternatives or feasible mitigation measures available that would substantially lessen the significant environmental effects of such projects; and
- Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so.

Section 21081.6 of the California Public Resources Code further requires that: the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation.

The monitoring program must be adopted when a public agency makes its findings under CEQA so that the program can be made a condition of project approval in order to mitigate significant effects on the environment. The program must be designed to ensure compliance with mitigation measures during project implementation to mitigate or avoid significant environmental effects.

Mitigation Monitoring Program Procedures

The MMRP for the proposed project will be in place through all phases of the project, including design, prior to construction, during construction, and during operation. The City of Palmdale shall have primary responsibility for administering the MMRP activities to staff, consultants, or contractors. The City has the responsibility of ensuring that monitoring is documented through periodic reports and that deficiencies are promptly corrected. The City's designated environmental monitor will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to remedy problems. Specific responsibilities of the City include:

- Coordination of all mitigation monitoring activities.
- Management of the preparation, approval, and filing of monitoring or permit compliance reports.
- Maintenance of records concerning the status of all approved mitigation measures.

- Assure quality control of field monitoring personnel.
- Coordinate with other agencies regarding compliance with mitigation or permit requirements.
- Review and recommend acceptance and certification of implementation documentation.
- Act as a contact for interested parties and surrounding property owners who wish to register complaints and observations of unsafe conditions and environmental violations; verify any such actions; and develop any necessary corrective actions.

5.3 Resolution of Noncompliance Complaints

Any person or agency may file a complaint that states noncompliance with the mitigation measures that were adopted as part of the approval process for the Antelope Valley Public Landfill CUP project. The complaint shall be directed to the City of Palmdale in written form providing detailed information on the purported violation. The City shall conduct an investigation and determine the validity of the complaint. If noncompliance with a mitigation measure is verified, the City shall take the necessary action(s) to remedy the violation. The complaint shall receive written confirmation indicating the results of the investigation or the final corrective action that was implemented in response to the specific noncompliance issue.

5.4 Mitigation Monitoring and Reporting Plan Matrix

The MMRP is organized in a matrix format. The first column identifies the mitigation measure numbers. The second column identifies the mitigation measures. The third column, entitled "Time Frame for Implementation," refers to when monitoring will occur. The fourth column, entitled "Responsible Monitoring Agency," refers to the agency responsible for ensuring that the mitigation measure is implemented. The fifth column, entitled "Verification of Compliance," has a sub-column for Initials, Date and Remarks. This last column will be used by the lead agency to document the person who verified the implementation of the mitigation measure, the date on which this verification occurred, and any other notable remarks.

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**Table 5-1
Mitigation Monitoring and Reporting Program Matrix**

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
Earth Resources						
4.1-1	Prior to the issuance of the Waste Discharge Requirements (WDR's) and approval of the Joint Technical Document (JTD) for the project by the Lahontan Regional Water Quality Control Board, the proposed design and supporting engineering analysis of the landfill's containment structures shall be reviewed and approved by the RWQCB to ensure the design complies with State regulations pursuant to California Code of Regulations, Title 27, Division 2. The applicant shall demonstrate to RWQCB satisfaction that the landfill liner and leachate collection system have been designed to preclude failure and will resist the maximum seismic shaking expected at the site	Prior to Issuance of WDRs	City of Palmdale Public works Department; LEA; and the Lahontan RWQCB			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	<p>based on risk assessment. Further, the design shall demonstrate that the final slopes will be stable under both static and dynamic conditions to protect public health and safety and prevent damage to the facility such that no significant impact to the environment will occur. The liner design, as proposed in Appendix B of the EIR, shall be modified or refined if necessary based on final engineering analysis and review by the RWCQB to ensure that the approved landfill design will mitigate impacts to a less than significant level.</p> <p>The landfill containment structures shall be constructed as approved by the RWQCB. During on-going landfill construction, geologic mapping of rock and soil exposed in future</p>	<p>During landfill construction and operations</p>				

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	excavations shall be completed. Information on rock type and any exposed folds, fractures and folds will be collected. Permanent cut slopes shall be observed by a qualified geologist to check for adverse bedding, joint patterns, or other geologic features that may impact the approved landfill design. Where necessary, the permanent cut slopes shall be constructed to ensure their stability. The geologic maps will be included with the construction reports for each portion of the constructed landfill. The reports will be submitted to the LEA and Lahontan RWQCB.					
4.1-2	Earth moving operations shall be observed, and the placement of fill shall be tested by a qualified geotechnical engineer during ongoing landfill operations. Observation and testing will	During landfill operations	City of Palmdale Public Works Department and the LEA			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	ensure fill placements are consistent with the approved landfill design.					
<i>Air Quality</i>						
4.2-1	Because the grading/disturbance of more than 10 acres will cause the daily PM-10 thresholds to be exceeded, construction of landfill ancillary facilities (new frontage road, R-5 access, and the Anaverde Creek erosion protection) shall not exceed 10 acres of grading on any given day.	During grading and operations	City of Palmdale Planning Department			
4.2-2	The internal haul road from the scale house into the landfill shall be incrementally paved with asphalted concrete or equivalent as depicted on Figure 4.2-1.	During grading and operations	City of Palmdale Planning Department			
4.2-3	Because of the potential for fugitive dust emissions from the	During grading and operations	City of Palmdale Planning			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	<p>proposed landfill to cause a public nuisance or exacerbate PM₁₀ non-attainment status within the Antelope Valley, dust generated by project activities shall be kept to a minimum and prevented from dispersing offsite. The project shall comply with all best available control measures of existing AVAQMD Rule 403, or any of its possible near future control measure enhancements. The project size is not sufficient to require preparation and approval of a formal fugitive dust control plan (DCP) as it is less than 100 acres of simultaneous disturbance. However, because of the non-attainment status of the air basin and the cumulative significance of continued elevated levels of PM-10 emissions, a DCP shall be prepared and submitted to the AVAQMD for their review and approval. The elements of such</p>		Department and the AVAQMD			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	<p>and active portions of the landfill, including on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary to prevent fugitive dust from leaving the landfill site.</p> <p>d. Signs shall be posted on-site limiting traffic to speeds of 15 mph or less on unpaved roads and 25 mph on paved roads.</p> <p>e. During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created</p>	<p>During grading and operations</p> <p>During grading, excavation, and operations</p>	<p>Department and the LEA</p> <p>City of Palmdale Planning Department and the LEA</p> <p>City of Palmdale Planning Department and the LEA</p>			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	by on-site activities and operations from being a nuisance or hazard, either off-site or on-site.					
4.2-4	If an odor nuisance problem should develop, appropriate control measures shall be employed such as applying additional cover material or more frequent application of the cover material to seal the surface, or adjustments to the landfill gas collection system.	During landfill operations	City of Palmdale Planning Department and the LEA			
4.2-5	The applicant shall include the following set of measures that, working together, will reduce operational greenhouse gas emissions of the project and the project’s potential effects on climate change: <ul style="list-style-type: none"> Hauling trucks shall be powered by liquefied natural gas (LNG), Compressed Natural Gas (CNG), or ultra-low sulfur diesel fuel. 	During grading, excavation, and operations	City of Palmdale Planning Department and the LEA			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	<ul style="list-style-type: none"> • Idling of heavy-duty hauling, trucks in excess of five minutes, and idling of off-road mobile sources of any type in excess of five minutes shall be prohibited. • When new landfill equipment is purchased by WMI, new commercially available equipment shall be purchased that exceeds California's emission standards in effect at the time of purchase. • Onsite vehicles and equipment shall be properly maintained by being serviced at least every 90 days and once annually in compliance with Department of Transportation (DOT) requirements. • Operation equipment used for the proposed project shall use clean alternative (i.e., non-diesel/biodiesel) fuels, or use equipment that has been 					

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	<p>retro-fitted with diesel particulate reduction traps or equivalent control technology, using equipment certified by CARB.</p> <ul style="list-style-type: none"> For the purchase of primary heavy duty, diesel powered landfill equipment at WMI (dozers and compactors), if equipment meeting California’s 2014 emission standards for off-highway, heavy duty diesel equipment is commercially available before 2014, WMI shall purchase such equipment as older equipment is replaced. 					
4.2-6	<p>Within one year of project approval, the applicant shall develop, and submit to the City, a Greenhouse Gas Reduction Plan that demonstrates how the AVPL will achieve by 2020 a reduction in annual GHG emissions such that emissions are no greater than 10</p>	<p>Within one year of project approval</p>	<p>City of Palmdale Planning Department and the LEA</p>			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	<p>percent below 2006 levels and will meet or exceed all regulatory requirements related to GHG control. The Reduction Plan shall include one or more of the following measures, or combination thereof:</p> <ul style="list-style-type: none"> • Use of alternative fuels, including but not limited to CNG, LNG, B-5 or B-20 Biodiesel in on-site equipment and in heavy duty truck fleets (and as a condition of future contract approvals if third-party haulers are used); • Use of hybrid, LNG, CNG or other similarly effective alternative fuel in hauling trucks; • Use of Best Available Control Technology and BMPs when designating new waste disposal cells (e.g., by 					

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	<p>designing any additional gas collectors in bottom liner systems) and to increase gas combustion capacity/improve flare destruction efficiency;</p> <ul style="list-style-type: none"> • Begin the process of developing, for construction and operation, a landfill gas-to-energy (LFGTE) or landfill gas to LNG or CNG plant in the future for use in fueling on- and off-road vehicles, operating equipment or for energy use when: (1) for a LFGTE project, the AVPL generates 1,200 scfm of landfill gas at 50 percent or better methane quality consistently for six months; (2) for LFGTLNG or CNG plant, the AVPL generates 2,500 scfm at 50 percent or better methane quality consistently for six months; 					

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	<ul style="list-style-type: none"> Increased diversion of organic material from landfill disposal and use as landfill cover material; Increased recycling and carbon offsets if available through an adopted program (e.g., the Western Climate Initiative); The plan shall include cost estimates for GHG reduction measures and identify funding sources. The plan shall include an implementation schedule that demonstrates substantial GHG emission reductions prior to the 2020 deadline, including implementation of “Early action” measures that may be implemented within three years of plan approval. The plan shall include an updated inventory of 					

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	projected GHG emissions and an updated estimate of GHG emissions in 1990. The plan shall be subject to review and approval by AVAQMD.					
4.2-7	Following closure of the landfill, the applicant shall continue to operate, maintain, and monitor the landfill gas collection and treatment system as long as the landfill continues to produce landfill gas, or until it is determined by the AVAQMD to ensure that emissions do not significantly contribute to additional greenhouse gas emissions.	After the closure of the landfill	City of Palmdale Planning Department and the LEA			
Hydrology and Water Quality						
4.3-1	The final design for the Anaverde Creek Scour Protection System shall be developed by a qualified engineer to comply with the City of Palmdale engineering design	Upon project approval in accordance with CUP conditions	City of Palmdale Public Works Department			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	requirements. The construction of the approved Scour Protection System shall be completed in conjunction with Landfill II and the wedge expansion in accordance with the CUP Conditions of Approval.					
Biological Resources						
4.4-1	Prior to the removal of any Joshua/Juniper trees, the <i>1998 Desert Vegetation Preservation Plan</i> (see Appendix E-2) prepared by FH&A shall be updated and approved by the City of Palmdale consistent with the City's Desert Vegetation Ordinance.	Prior to removal of any Joshua/Juniper trees	City of Palmdale Planning Department			
4.4-2	Pursuant to Section 1601 – 1603 of the California Fish and Game Code responsible agencies (i.e., CDFG and Lahontan RWQCB) shall be notified and permits/approvals shall be obtained prior to any activities	Prior to grading of the 1.9 acres of CDFG delineated area	City of Palmdale Planning Department			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	within, or encroachment upon delineated bed and bank of the Anaverde Creek along the southern margin of the Landfill property.					
4.4-3	Prior to issuance of the landfill's Waste Discharge Requirements (WDRs), the project engineer shall finalize erosion and siltation control plans and other BMPs, as necessary to prevent graded and cleared areas from being eroded, resulting in the transport of sediment downstream to Anaverde Creek.	Prior to issuance of the WDRs	City of Palmdale Planning Department and Lahontan RWQCB			
4.4-4	Landfill expansion actions which directly affect vegetation formations (i.e., initial vegetation clearing) shall be initiated outside of the timing of the native bird nesting season (mid-April through mid-August) to avoid disturbing active nests, per provisions of the Migratory Bird	Prior to initial vegetation clearing	City of Palmdale Planning Department			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	Treaty Act and California Fish and Game Code. If initial vegetation disturbance and clearing cannot be performed outside of this window of non-breeding activity, then it shall be preceded by a thorough site/pre-construction surveys in coordination with DFG for active nests by a qualified biologist; nests found shall be flagged, and a perimeter fence installed at an appropriate distance (usually between 50 and 300 feet from the nest, depending upon species and terrain). No work shall be performed within the fenced areas until such time as the nests are determined to be inactive and the fledglings have left the area.					
4.4-5	Facility design and management practices shall be implemented to reduce the intensity of exterior and security lighting adjacent to	During landfill activities and operation	City of Palmdale Planning Department			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	habitat areas. Measures such as shielded, downward-directed exterior light fixtures, use of sodium vapor or similar low-intensity bulbs (other than mercury vapor), shall be utilized. Security and activity lighting shall be directed onto target working face areas, and not into the creek channel.					
4.4-6	The final design of the “off-site” utility pole placement shall be outside of the bed and bank of the channel to permit free passage by the wildlife along the channel.	Prior to site plan approval for utility poles	City of Palmdale Planning Department			This mitigation measure has been satisfied.
Noise						
4.5-1	In conjunction with grading permit issuance for the construction of new frontage road and the realignment of City Ranch Road (R-5 access) and during grading and construction operations, the following mitigation measures					

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	<p>shall be implemented for the project:</p> <p>a. All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers, to the satisfaction of the City's Public Works or Building Inspector.</p> <p>b. During construction of the new landfill access road, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers, to the extent practical, to the satisfaction of the City's Public Works or Building Inspector.</p> <p>c. During construction of the new landfill access road and to the satisfaction of the City's Public Works Inspector</p>	<p>During grading and construction</p> <p>During grading and construction</p> <p>During grading and construction</p>	<p>City of Palmdale Public Works Department</p> <p>City of Palmdale Public Works Department</p> <p>City of Palmdale Public Works Department</p>			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	or Building Inspector, stockpiling and vehicle staging areas shall be located as far as practical from noise sensitive receptors during construction activities.					
4.5-2	Operational activities before 6:00 a.m. or after 8:00 p.m. shall be restricted as follows: a. No receipt of refuse or unloading activities shall be conducted during those hours. b. No heavy equipment operation within 1,000 feet of any residence under clear line-of-sight conditions shall take place during those hours. c. No bird repellent activity sound generators shall occur	During landfill operations During landfill operations During landfill operations	City of Palmdale Planning Department City of Palmdale Planning Department City of Palmdale Planning			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	before 7:00 a.m. or after 8:00 p.m.		Department			
Aesthetics / Light and Glare						
4.6-1	Interim vegetative cover shall be established as land filling proceeds to help offset visual impacts prior to application of final cover and vegetation at landfill closure. This interim measure provides that the outer southerly facing slopes shall receive cover material consistent with native species of the surrounding terrain as the phased development continues with application at appropriate intervals but at a minimum of every two to four years. Interim vegetation plant densities/seed mix shall be completed consistent with the baseline study to be conducted prior to the beginning of land filling operations in the expansion area.	During the phased landfill development; at appropriate intervals but at a minimum of every 2 to 4 years, prior to application of final cover and vegetation at landfill closure	City of Palmdale Planning Department			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
4.6-2	Final design of the access roadway shall comply with Policy ER 3.1.2, to the extent feasible, to reduce the visual impact to the existing ridgeline as viewed from Tierra Subida and Rayburn Road.	Prior to site plan approval for the new access roadway	City of Palmdale Planning Department			
4.6-3	During conditions of severe wind, operating hours shall be limited, size of the working face shall be reduced, and completed cells shall be promptly covered.	During landfill operations	City of Palmdale Planning Department			
4.6-4	During landfill operations and after construction activity, personnel shall conduct periodic litter cleanup along, 1) the access roadway (R-5 access) and adjacent land from the scales to Tierra Subida Avenue and 2) properties adjacent to the landfill. The goal is to ensure that stray litter (including litter that is illegally dumped along the landfill access road) is	During landfill operations	City of Palmdale Planning Department			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	immediately removed when strong winds occur.					
Traffic and Circulation						
4.7-1	<p>The City of Palmdale shall approve the final roadway design for the new landfill access and periodically review traffic operations in the vicinity of the project once the project is constructed to assure that the traffic operations are satisfactory.</p> <p>The future landfill access road alignment shall be along R-5 as a two lane roadway (60-foot right-of-way). R-5 shall intersect a new frontage road.</p> <p>The R-5 access road shall be constructed as a two lane roadway (60-foot right-of-way).</p> <p>The future landfill access road alignment shall also be along the new frontage road that would</p>	Upon site plan approval for the new access roadway and during landfill operations	City of Palmdale Public Works Department			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	<p>connect with City Ranch Road and intersect Tierra Subida at Rayburn Road, and create a 4-way signalized intersection, and construct the remaining access road along the R-5 dedicated right-of-way (Figures 4.7-13, Proposed Realignment of City Ranch Road to be Opposite Rayburn Road at Tierra Subida Avenue and 4.7-14, Proposed City Ranch Road Roadway Cross-Section).</p> <p>Preliminary design of the frontage road calls for a 40-foot roadway measured from curb to curb, with an 8-foot sidewalk adjacent to the west curb and a 10-foot-minimum buffer between the east curb and the ultimate location of the west sidewalk of Tierra Subida proper. The new realignment of the landfill access (new frontage road) shall accomplish the following:</p>					

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	<ul style="list-style-type: none"> ▪ Improve sight distance and related operational safety. ▪ Improve horizontal and vertical alignment. ▪ Wider lanes will result at the Tierra Subida Avenue/Rayburn Road intersection than at the existing City Ranch Road intersection. ▪ Improve traffic signal spacing along Tierra Subida Avenue. 					
4.7-2	The applicant shall construct right-of-way and traffic signal improvements at the intersection of the landfill access road at Rayburn Road (see Figure 4.7-13) in conjunction with Landfill II and the wedge expansion in accordance with the CUP Conditions of Approval.	Upon project approval in accordance with CUP conditions	City of Palmdale Public Works Department			
4.7-3	During landfill operations, worker-	During landfill	City of Palmdale			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	rideshare and transit plans shall be encouraged by the landfill operator consistent with the goals of the Air Quality Management Plan.	operations	Public Works Department			
4.7-4	The applicant shall pay traffic impact fees in accordance with the City Traffic Impact Fee Ordinance. Credits shall be applied consistent with the Ordinance for the improvements (see Mitigation Measure 4.7-2) installed by the applicant.	Upon project approval	City of Palmdale Public Works Department			
Risk of Upset and Human Health						
4.8-1	<p>The permittee shall maintain a comprehensive waste load checking program, which shall include the following:</p> <p>a. All waste hauling vehicles shall be screened at the scales with a radiation detector device acceptable to the Local Enforcement</p>	During landfill operations	City of Palmdale Public Works Department and the LEA			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	Agency for the presence of radioactive materials.					
	b. Sensors capable of detecting volatile organic compounds, acceptable to the Local Enforcement Agency shall be available and used as directed by the Local Enforcement Agency.	During landfill operations	City of Palmdale Public Works Department and the LEA			
	c. A remote television monitor or an alternative procedure acceptable to the Local Enforcement Agency shall be maintained at the scales to visually inspect incoming roll-off type loads and open top vehicles.	During landfill operations	City of Palmdale Public Works Department and the LEA			
	d. The dumping area shall be continuously inspected for hazardous and liquid waste and radioactive waste/materials. This inspection shall be	During landfill operations	City of Palmdale Public Works Department and the LEA			

No.	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
	<p>accomplished by equipment operators and spotters who have been trained in an inspection program approved by the Local Enforcement Agency (LEA). The landfill currently complies with the LEA inspection procedures and will continue to comply as required by their SWFP.</p> <p>e. Manual inspection of randomly selected refuse loads shall be conducted. The frequency of inspections shall be as directed by the Local Enforcement Agency. The checking program shall be conducted by personnel trained in accordance with a plan approved by the Local Enforcement Agency.</p>	During landfill operations	City of Palmdale Public Works Department and the LEA			

APPENDIX A

ANTELOPE VALLEY/PALMDALE LANDFILL GAS FLOW LETTER

Waste Management
September 23, 2010



PALMDALE LANDFILL
 1200 W. City Ranch Road
 Palmdale, CA 93551
 (661) 947-7197

September 23, 2010

Attn: Jane Chang
AECOM
 2737 Campus Drive
 Irvine, CA 92612

Re: Antelope Valley / Palmdale Landfill Gas Flow

Dear Ms. Chang:

Please see table below tracking gas flow at the Antelope Valley Palmdale Landfill from January 6, 2010 through September 1, 2010:

	Methane	Carbon Dioxide	Oxygen	Balance Gas (Nitrogen)	Total Flow	
1/6/2010 8:10	44	38.3	0.4	17.3	949	No Adj. Made
1/13/2010 15:15	43.8	37.8	0.4	18	975	No Adj. Made
1/20/2010 8:22	44.5	38.5	0.4	16.6	996	No Adj. Made
1/21/2010 9:52	45.8	38.1	0.6	15.5	1002	
1/28/2010 12:08	43.1	38.2	0.5	18.2	1058	
2/2/2010 8:45	43.3	38.2	0.4	18.1	1036	No Adj. Made
2/4/2010 12:47	45	39.3	0.4	15.3	1031	
2/10/2010 14:06	44.3	39	0.6	16.1	1044	
2/17/2010 13:57	45.6	39.7	0.3	14.4	1080	
2/24/2010 14:14	45.6	38.3	0.6	15.5	1044	
3/3/2010 12:56	45.8	39.3	0.6	14.3	1052	
2/24/2010 12:30						
3/10/2010 14:55	45.3	38.2	0.6	15.9	1068	
3/17/2010 9:26	44.8	39.3	0.6	15.3	780	
3/17/2010 9:30						
3/24/2010 8:31	45.2	38.9	0.5	15.4	752	No Adj. Made
4/1/2010 15:01	45.7	39.4	0.4	14.5	758	
4/7/2010 9:13	44.7	39	0.5	15.8	660	
4/12/2010 14:10	44.2	37.2	0.7	17.9	710	
4/12/2010 15:24	47.6	40.4	0.4	11.6	840	Inc. Flow/Vac.
4/13/2010 11:40	46.8	39.5	0.5	13.2	952	
4/14/2010 8:27	46.3	39.3	0.7	13.7	908	
4/16/2010 13:44	42.2	37.9	0.6	19.3	992	
4/21/2010 15:56	45.4	39.1	0.6	14.9	1006	
4/22/2010 7:52	45.3	39.9	0.4	14.4	978	
4/28/2010 12:18	44.3	39.4	0.3	16	1006	No Adj. Made
5/3/2010 13:12	39	37.3	0.4	23.3	1033	No Adj. Made
5/3/2010 14:38	39.4	38	0.2	22.4	1048	Inc. Flow/Vac.
5/5/2010 9:24	40.5	38.2	0.4	20.9	991	No Adj. Made
5/7/2010 13:13	40.1	38	0.4	21.5	923	No Adj. Made
5/13/2010 9:27	41.3	37.8	0.3	20.6	888	
5/19/2010 15:16	42	38.4	0.3	19.3	826	
5/21/2010 13:41	42.8	38.8	0.3	18.1	868	
5/25/2010 8:37	42.5	37.8	0.2	19.5	889	

September 23, 2010

Page 2

5/26/2010 8:34	42.8	37.9	0.2	19.1	874	
6/2/2010 9:04	41	38.5	0.2	20.3	884	No Adj. Made
6/3/2010 8:55	42.3	38.5	0	19.2	830	
6/9/2010 8:42	42.3	38.6	0.2	18.9	818	
6/14/2010 7:15	41.8	37.5	0.3	20.4	820	
6/24/2010 9:10	43.2	38.1	0.5	18.2	856	
6/30/2010 10:03	43.9	38.8	0	17.3	843	
6/3/2010 9:00						
7/7/2010 8:31	42.5	38.1	0.5	18.9	825	
7/8/2010 7:30						
7/14/2010 10:10	42.8	38.9	0.2	18.1	839	
7/21/2010 8:18	43.7	38.8	0.2	17.3	757	No Adj. Made
7/28/2010 8:22	42.3	37.8	0.7	19.2	770	No Adj. Made
8/3/2010 10:28	43.3	38.2	0.4	18.1	780	
8/3/2010 10:30						
8/10/2010 8:37	44.2	38.9	0.2	16.7	769	No Adj. Made
8/17/2010 9:38	44.7	38.6	0.5	16.2	712	
8/24/2010 12:07	45.7	37.6	0.9	15.8	712	
8/25/2010 8:22	45.7	38.7	0.7	14.9	684	
9/1/2010 9:28	46.2	38.8	0.7	14.3	671	No Adj. Made
Averages	43.77	38.55	0.43	17.26	889.53	

If you have any questions or if we provide you with additional information, please contact me at 480-624-8410.

Sincerely,

Dave Bearden
WASTE MANAGEMENT
West Group Manager Gas Operations

DB/MSH

APPENDIX B

CALIFORNIA CLEAN ENERGY COMMITTEE APPENDICES

California Clean Energy Committee
July 3, 2010

(Available at the City of Palmdale Planning Department)

APPENDIX C

PROTOCOLS FOR SURVEYING AND EVALUATING IMPACTS TO SPECIAL STATUS NATIVE PLANT POPULATIONS AND NATURAL COMMUNITIES

California Department of Fish and Game
November 24, 2009

Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities

State of California
CALIFORNIA NATURAL RESOURCES AGENCY
Department of Fish and Game
November 24, 2009¹

INTRODUCTION AND PURPOSE

The conservation of special status native plants and their habitats, as well as natural communities, is integral to maintaining biological diversity. The purpose of these protocols is to facilitate a consistent and systematic approach to the survey and assessment of special status native plants and natural communities so that reliable information is produced and the potential of locating a special status plant species or natural community is maximized. They may also help those who prepare and review environmental documents determine when a botanical survey is needed, how field surveys may be conducted, what information to include in a survey report, and what qualifications to consider for surveyors. The protocols may help avoid delays caused when inadequate biological information is provided during the environmental review process; assist lead, trustee and responsible reviewing agencies to make an informed decision regarding the direct, indirect, and cumulative effects of a proposed development, activity, or action on special status native plants and natural communities; meet California Environmental Quality Act (CEQA)² requirements for adequate disclosure of potential impacts; and conserve public trust resources.

DEPARTMENT OF FISH AND GAME TRUSTEE AND RESPONSIBLE AGENCY MISSION

The mission of the Department of Fish and Game (DFG) is to manage California's diverse wildlife and native plant resources, and the habitats upon which they depend, for their ecological values and for their use and enjoyment by the public. DFG has jurisdiction over the conservation, protection, and management of wildlife, native plants, and habitat necessary to maintain biologically sustainable populations (Fish and Game Code §1802). DFG, as trustee agency under CEQA §15386, provides expertise in reviewing and commenting on environmental documents and makes protocols regarding potential negative impacts to those resources held in trust for the people of California.

Certain species are in danger of extinction because their habitats have been severely reduced in acreage, are threatened with destruction or adverse modification, or because of a combination of these and other factors. The California Endangered Species Act (CESA) provides additional protections for such species, including take prohibitions (Fish and Game Code §2050 *et seq.*). As a responsible agency, DFG has the authority to issue permits for the take of species listed under CESA if the take is incidental to an otherwise lawful activity; DFG has determined that the impacts of the take have been minimized and fully mitigated; and, the take would not jeopardize the continued existence of the species (Fish and Game Code §2081). Surveys are one of the preliminary steps to detect a listed or special status plant species or natural community that may be impacted significantly by a project.

DEFINITIONS

Botanical surveys provide information used to determine the potential environmental effects of proposed projects on all special status plants and natural communities as required by law (i.e., CEQA, CESA, and Federal Endangered Species Act (ESA)). Some key terms in this document appear in **bold font** for assistance in use of the document.

For the purposes of this document, **special status plants** include all plant species that meet one or more of the following criteria³:

¹ This document replaces the DFG document entitled "Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened and Endangered Plants and Natural Communities."

² <http://ceres.ca.gov/ceqa/>

³ Adapted from the East Alameda County Conservation Strategy available at http://www.fws.gov/sacramento/EACCS/Documents/080228_Species_Evaluation_EACCS.pdf

- Listed or proposed for listing as threatened or endangered under ESA or candidates for possible future listing as threatened or endangered under the ESA (50 CFR §17.12).
- Listed⁴ or candidates for listing by the State of California as threatened or endangered under CESA (Fish and Game Code §2050 *et seq.*). A species, subspecies, or variety of plant is **endangered** when the prospects of its survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, disease, or other factors (Fish and Game Code §2062). A plant is **threatened** when it is likely to become endangered in the foreseeable future in the absence of special protection and management measures (Fish and Game Code §2067).
- Listed as rare under the California Native Plant Protection Act (Fish and Game Code §1900 *et seq.*). A plant is **rare** when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens (Fish and Game Code §1901).
- Meet the definition of rare or endangered under CEQA §15380(b) and (d). Species that may meet the definition of rare or endangered include the following:
 - ♦ Species considered by the California Native Plant Society (CNPS) to be "rare, threatened or endangered in California" (Lists 1A, 1B and 2);
 - ♦ Species that may warrant consideration on the basis of local significance or recent biological information⁵;
 - ♦ Some species included on the California Natural Diversity Database's (CNDDDB) *Special Plants, Bryophytes, and Lichens List* (California Department of Fish and Game 2008)⁶.
- Considered a **locally significant species**, that is, a species that is not rare from a statewide perspective but is rare or uncommon in a local context such as within a county or region (CEQA §15125 (c)) or is so designated in local or regional plans, policies, or ordinances (CEQA Guidelines, Appendix G). Examples include a species at the outer limits of its known range or a species occurring on an uncommon soil type.

Special status natural communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. These communities may or may not contain special status species or their habitat. The most current version of the Department's *List of California Terrestrial Natural Communities*⁷ indicates which natural communities are of special status given the current state of the California classification.

Most types of wetlands and riparian communities are considered special status natural communities due to their limited distribution in California. These natural communities often contain special status plants such as those described above. These protocols may be used in conjunction with protocols formulated by other agencies, for example, those developed by the U.S. Army Corps of Engineers to delineate jurisdictional wetlands⁸ or by the U.S. Fish and Wildlife Service to survey for the presence of special status plants⁹.

⁴ Refer to current online published lists available at: <http://www.dfg.ca.gov/biogeodata>.

⁵ In general, CNPS List 3 plants (plants about which more information is needed) and List 4 plants (plants of limited distribution) may not warrant consideration under CEQA §15380. These plants may be included on special status plant lists such as those developed by counties where they would be addressed under CEQA §15380. List 3 plants may be analyzed under CEQA §15380 if sufficient information is available to assess potential impacts to such plants. Factors such as regional rarity vs. statewide rarity should be considered in determining whether cumulative impacts to a List 4 plant are significant even if individual project impacts are not. List 3 and 4 plants are also included in the California Natural Diversity Database's (CNDDDB) *Special Plants, Bryophytes, and Lichens List*. [Refer to the current online published list available at: <http://www.dfg.ca.gov/biogeodata>.] Data on Lists 3 and 4 plants should be submitted to CNDDDB. Such data aids in determining or revising priority ranking.

⁶ Refer to current online published lists available at: <http://www.dfg.ca.gov/biogeodata>.

⁷ <http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/natcomlist.pdf>. The rare natural communities are asterisked on this list.

⁸ <http://www.wetlands.com/regs/lpge02e.htm>

⁹ U.S. Fish and Wildlife Service Survey Guidelines available at <http://www.fws.gov/sacramento/es/protocol.htm>

BOTANICAL SURVEYS

Conduct botanical surveys prior to the commencement of any activities that may modify vegetation, such as clearing, mowing, or ground-breaking activities. It is appropriate to conduct a botanical field survey when:

- Natural (or naturalized) vegetation occurs on the site, and it is unknown if special status plant species or natural communities occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
- Special status plants or natural communities have historically been identified on the project site; or
- Special status plants or natural communities occur on sites with similar physical and biological properties as the project site.

SURVEY OBJECTIVES

Conduct field surveys in a manner which maximizes the likelihood of locating special status plant species or special status natural communities that may be present. Surveys should be **floristic in nature**, meaning that every plant taxon that occurs on site is identified to the taxonomic level necessary to determine rarity and listing status. "Focused surveys" that are limited to habitats known to support special status species or are restricted to lists of likely potential species are not considered floristic in nature and are not adequate to identify all plant taxa on site to the level necessary to determine rarity and listing status. Include a list of plants and natural communities detected on the site for each botanical survey conducted. More than one field visit may be necessary to adequately capture the floristic diversity of a site. An indication of the prevalence (estimated total numbers, percent cover, density, etc.) of the species and communities on the site is also useful to assess the significance of a particular population.

SURVEY PREPARATION

Before field surveys are conducted, compile relevant botanical information in the general project area to provide a regional context for the investigators. Consult the CNDDDB¹⁰ and BIOS¹¹ for known occurrences of special status plants and natural communities in the project area prior to field surveys. Generally, identify vegetation and habitat types potentially occurring in the project area based on biological and physical properties of the site and surrounding ecoregion¹², unless a larger assessment area is appropriate. Then, develop a list of special status plants with the potential to occur within these vegetation types. This list can serve as a tool for the investigators and facilitate the use of reference sites; however, special status plants on site might not be limited to those on the list. Field surveys and subsequent reporting should be comprehensive and floristic in nature and not restricted to or focused only on this list. Include in the survey report the list of potential special status species and natural communities, and the list of references used to compile the background botanical information for the site.

SURVEY EXTENT

Surveys should be comprehensive over the entire site, including areas that will be directly or indirectly impacted by the project. Adjoining properties should also be surveyed where direct or indirect project effects, such as those from fuel modification or herbicide application, could potentially extend offsite. Pre-project surveys restricted to known CNDDDB rare plant locations may not identify all special status plants and communities present and do not provide a sufficient level of information to determine potential impacts.

FIELD SURVEY METHOD

Conduct surveys using **systematic field techniques** in all habitats of the site to ensure thorough coverage of potential impact areas. The level of effort required per given area and habitat is dependent upon the vegetation and its overall diversity and structural complexity, which determines the distance at which plants can be identified. Conduct surveys by walking over the entire site to ensure thorough coverage, noting all plant taxa

¹⁰ Available at <http://www.dfg.ca.gov/bioqeodata/cnddb>

¹¹ <http://www.bios.dfg.ca.gov/>

¹² Ecological Subregions of California, available at <http://www.fs.fed.us/r5/projects/ecoregions/toc.htm>

observed. The level of effort should be sufficient to provide comprehensive reporting. For example, one person-hour per eight acres per survey date is needed for a comprehensive field survey in grassland with medium diversity and moderate terrain¹³, with additional time allocated for species identification.

TIMING AND NUMBER OF VISITS

Conduct surveys in the field at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting. Space visits throughout the growing season to accurately determine what plants exist on site. Many times this may involve multiple visits to the same site (e.g. in early, mid, and late-season for flowering plants) to capture the floristic diversity at a level necessary to determine if special status plants are present¹⁴. The timing and number of visits are determined by geographic location, the natural communities present, and the weather patterns of the year(s) in which the surveys are conducted.

REFERENCE SITES

When special status plants are known to occur in the type(s) of habitat present in the project area, observe reference sites (nearby accessible occurrences of the plants) to determine whether those species are identifiable at the time of the survey and to obtain a visual image of the target species, associated habitat, and associated natural community.

USE OF EXISTING SURVEYS

For some sites, floristic inventories or special status plant surveys may already exist. Additional surveys may be necessary for the following reasons:

- Surveys are not current¹⁵; or
- Surveys were conducted in natural systems that commonly experience year to year fluctuations such as periods of drought or flooding (e.g. vernal pool habitats or riverine systems); or
- Surveys are not comprehensive in nature; or fire history, land use, physical conditions of the site, or climatic conditions have changed since the last survey was conducted¹⁶; or
- Surveys were conducted in natural systems where special status plants may not be observed if an annual above ground phase is not visible (e.g. flowers from a bulb); or
- Changes in vegetation or species distribution may have occurred since the last survey was conducted, due to habitat alteration, fluctuations in species abundance and/or seed bank dynamics.

NEGATIVE SURVEYS

Adverse conditions may prevent investigators from determining the presence of, or accurately identifying, some species in potential habitat of target species. Disease, drought, predation, or herbivory may preclude the presence or identification of target species in any given year. Discuss such conditions in the report.

The failure to locate a known special status plant occurrence during one field season does not constitute evidence that this plant occurrence no longer exists at this location, particularly if adverse conditions are present. For example, surveys over a number of years may be necessary if the species is an annual plant having a persistent, long-lived seed bank and is known not to germinate every year. Visits to the site in more

¹³ Adapted from U.S. Fish and Wildlife Service kit fox survey guidelines available at www.fws.gov/sacramento/es/documents/kitfox_no_protocol.pdf

¹⁴ U.S. Fish and Wildlife Service Survey Guidelines available at <http://www.fws.gov/sacramento/es/protocol.htm>

¹⁵ Habitats, such as grasslands or desert plant communities that have annual and short-lived perennial plants as major floristic components may require yearly surveys to accurately document baseline conditions for purposes of impact assessment. In forested areas, however, surveys at intervals of five years may adequately represent current conditions. For forested areas, refer to "Guidelines for Conservation of Sensitive Plant Resources Within the Timber Harvest Review Process and During Timber Harvesting Operations", available at <https://r1.dfg.ca.gov/portal/Portals/12/THPBotanicalGuidelinesJuly2005.pdf>

¹⁶ U.S. Fish and Wildlife Service Survey Guidelines available at http://www.fws.gov/ventura/speciesinfo/protocols_guidelines/docs/botanicalinventories.pdf

than one year increase the likelihood of detection of a special status plant especially if conditions change. To further substantiate negative findings for a known occurrence, a visit to a nearby reference site may ensure that the timing of the survey was appropriate.

REPORTING AND DATA COLLECTION

Adequate information about special status plants and natural communities present in a project area will enable reviewing agencies and the public to effectively assess potential impacts to special status plants or natural communities¹⁷ and will guide the development of minimization and mitigation measures. The next section describes necessary information to assess impacts. For comprehensive, systematic surveys where no special status species or natural communities were found, reporting and data collection responsibilities for investigators remain as described below, excluding specific occurrence information.

SPECIAL STATUS PLANT OR NATURAL COMMUNITY OBSERVATIONS

Record the following information for locations of each special status plant or natural community detected during a field survey of a project site.

- A detailed map (1:24,000 or larger) showing locations and boundaries of each special status species occurrence or natural community found as related to the proposed project. Mark occurrences and boundaries as accurately as possible. Locations documented by use of global positioning system (GPS) coordinates must include the datum¹⁸ in which they were collected;
- The site-specific characteristics of occurrences, such as associated species, habitat and microhabitat, structure of vegetation, topographic features, soil type, texture, and soil parent material. If the species is associated with a wetland, provide a description of the direction of flow and integrity of surface or subsurface hydrology and adjacent off-site hydrological influences as appropriate;
- The number of individuals in each special status plant population as counted (if population is small) or estimated (if population is large);
- If applicable, information about the percentage of individuals in each life stage such as seedlings vs. reproductive individuals;
- The number of individuals of the species per unit area, identifying areas of relatively high, medium and low density of the species over the project site; and
- Digital images of the target species and representative habitats to support information and descriptions.

FIELD SURVEY FORMS

When a special status plant or natural community is located, complete and submit to the CNDDDB a California Native Species (or Community) Field Survey Form¹⁹ or equivalent written report, accompanied by a copy of the relevant portion of a 7.5 minute topographic map with the occurrence mapped. Present locations documented by use of GPS coordinates in map and digital form. Data submitted in digital form must include the datum²⁰ in which it was collected. If a potentially undescribed special status natural community is found on the site, document it with a Rapid Assessment or Relevé form²¹ and submit it with the CNDDDB form.

VOUCHER COLLECTION

Voucher specimens provide verifiable documentation of species presence and identification as well as a public record of conditions. This information is vital to all conservation efforts. Collection of voucher specimens should

¹⁷ Refer to current online published lists available at: <http://www.dfg.ca.gov/biogeodata>. For Timber Harvest Plans (THPs) please refer to the "Guidelines for Conservation of Sensitive Plant Resources Within the Timber Harvest Review Process and During Timber Harvesting Operations", available at <https://r1.dfg.ca.gov/portal/Portals/12/THPBotanicalGuidelinesJuly2005.pdf>

¹⁸ NAD83, NAD27 or WGS84

¹⁹ <http://www.dfg.ca.gov/biogeodata>

²⁰ NAD83, NAD27 or WGS84

²¹ http://www.dfg.ca.gov/biogeodata/vegcamp/veg_publications_protocols.asp

be conducted in a manner that is consistent with conservation ethics, and is in accordance with applicable state and federal permit requirements (e.g. incidental take permit, scientific collection permit). Voucher collections of special status species (or suspected special status species) should be made only when such actions would not jeopardize the continued existence of the population or species.

Deposit voucher specimens with an indexed regional herbarium²² no later than 60 days after the collections have been made. Digital imagery can be used to supplement plant identification and document habitat. Record all relevant permittee names and permit numbers on specimen labels. A collecting permit is required prior to the collection of State-listed plant species²³.

BOTANICAL SURVEY REPORTS

Include reports of botanical field surveys containing the following information with project environmental documents:

- **Project and site description**
 - ♦ A description of the proposed project;
 - ♦ A detailed map of the project location and study area that identifies topographic and landscape features and includes a north arrow and bar scale; and,
 - ♦ A written description of the biological setting, including vegetation²⁴ and structure of the vegetation; geological and hydrological characteristics; and land use or management history.
- **Detailed description of survey methodology and results**
 - ♦ Dates of field surveys (indicating which areas were surveyed on which dates), name of field investigator(s), and total person-hours spent on field surveys;
 - ♦ A discussion of how the timing of the surveys affects the comprehensiveness of the survey;
 - ♦ A list of potential special status species or natural communities;
 - ♦ A description of the area surveyed relative to the project area;
 - ♦ References cited, persons contacted, and herbaria visited;
 - ♦ Description of reference site(s), if visited, and phenological development of special status plant(s);
 - ♦ A list of all taxa occurring on the project site. Identify plants to the taxonomic level necessary to determine whether or not they are a special status species;
 - ♦ Any use of existing surveys and a discussion of applicability to this project;
 - ♦ A discussion of the potential for a false negative survey;
 - ♦ Provide detailed data and maps for all special plants detected. Information specified above under the headings "Special Status Plant or Natural Community Observations," and "Field Survey Forms," should be provided for locations of each special status plant detected;
 - ♦ Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms should be sent to the CNDDDB and included in the environmental document as an Appendix. It is not necessary to submit entire environmental documents to the CNDDDB; and,
 - ♦ The location of voucher specimens, if collected.

²² For a complete list of indexed herbaria, see: Holmgren, P., N. Holmgren and L. Barnett. 1990. Index Herbariorum, Part 1: Herbaria of the World. New York Botanic Garden, Bronx, New York. 693 pp. Or: <http://www.nybg.org/bsci/ih/ih.html>

²³ Refer to current online published lists available at: <http://www.dfg.ca.gov/biogeodata>.

²⁴ A vegetation map that uses the National Vegetation Classification System (<http://biology.usgs.gov/npsveg/nvcs.html>), for example *A Manual of California Vegetation*, and highlights any special status natural communities. If another vegetation classification system is used, the report should reference the system, provide the reason for its use, and provide a crosswalk to the National Vegetation Classification System.

- **Assessment of potential impacts**
 - ♦ A discussion of the significance of special status plant populations in the project area considering nearby populations and total species distribution;
 - ♦ A discussion of the significance of special status natural communities in the project area considering nearby occurrences and natural community distribution;
 - ♦ A discussion of direct, indirect, and cumulative impacts to the plants and natural communities;
 - ♦ A discussion of threats, including those from invasive species, to the plants and natural communities;
 - ♦ A discussion of the degree of impact, if any, of the proposed project on unoccupied, potential habitat of the species;
 - ♦ A discussion of the immediacy of potential impacts; and,
 - ♦ Recommended measures to avoid, minimize, or mitigate impacts.

QUALIFICATIONS

Botanical consultants should possess the following qualifications:

- Knowledge of plant taxonomy and natural community ecology;
- Familiarity with the plants of the area, including special status species;
- Familiarity with natural communities of the area, including special status natural communities;
- Experience conducting floristic field surveys or experience with floristic surveys conducted under the direction of an experienced surveyor;
- Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
- Experience with analyzing impacts of development on native plant species and natural communities.

SUGGESTED REFERENCES

- Barbour, M., T. Keeler-Wolf, and A. A. Schoenherr (eds.). 2007. *Terrestrial vegetation of California* (3rd Edition). University of California Press.
- Bonham, C.D. 1988. *Measurements for terrestrial vegetation*. John Wiley and Sons, Inc., New York, NY.
- California Native Plant Society. Most recent version. *Inventory of rare and endangered plants* (online edition). California Native Plant Society, Sacramento, CA. Online URL <http://www.cnps.org/inventory>.
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- Elzinga, C.L., D.W. Salzer, and J. Willoughby. 1998. *Measuring and monitoring plant populations*. BLM Technical Reference 1730-1. U.S. Dept. of the Interior, Bureau of Land Management, Denver, Colorado.
- Leppig, G. and J.W. White. 2006. *Conservation of peripheral plant populations in California*. *Madroño* 53:264-274.
- Mueller-Dombois, D. and H. Ellenberg. 1974. *Aims and methods of vegetation ecology*. John Wiley and Sons, Inc., New York, NY.
- U.S. Fish and Wildlife Service. 1996. *Guidelines for conducting and reporting botanical inventories for federally listed plants on the Santa Rosa Plain*. Sacramento, CA.
- U.S. Fish and Wildlife Service. 1996. *Guidelines for conducting and reporting botanical inventories for federally listed, proposed and candidate plants*. Sacramento, CA.
- Van der Maarel, E. 2005. *Vegetation Ecology*. Blackwell Science Ltd., Malden, MA.

Sensitivity of Top Priority Rare Natural Communities in Southern California

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

- S1.# Fewer than 6 known locations and/or on fewer than 2,000 acres of habitat remaining.
- S2.# Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.
- S3.# Occurs in 21-100-known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

- S1.1 = very threatened
- S2.2 = threatened
- S3.3 = no current threats known

Sensitivity Rankings (February 1992)

<u>Rank</u>	<u>Community Name</u>
S1.1	Mojave Riparian Forest Sonoran Cottonwood Willow Riparian Mesquite Bosque Elephant Tree Woodland Crucifixion Thorn Woodland Allthorn Woodland Arizonan Woodland Southern California Walnut Forest Mainland Cherry Forest Southern Bishop Pine Forest Torrey Pine Forest Desert Mountain White Fir Forest Southern Dune Scrub Southern Coastal Bluff Scrub Maritime Succulent Scrub Riversidean Alluvial Fan Sage Scrub Southern Maritime Chaparral Valley Needlegrass Grassland Great Basin Grassland Mojave Desert Grassland Pebble Plains Southern Sedge Bog Cismontane Alkali Marsh

- S1.2 Southern Foredunes
Mono Pumice Flat
Southern Interior Basalt Flow Vernal Pool
- S2.1 Venturan Coastal Sage Scrub
Diegan Coastal Sage Scrub
Riversidean Upland Coastal Sage Scrub
Riversidean Desert Sage Scrub
Sagebrush Steppe
Desert Sink Scrub
Mafic Southern Mixed Chaparral
San Diego Mesa Hardpan Vernal Pool
San Diego Mesa Claypan Vernal Pool
Alkali Meadow
Southern Coastal Salt Marsh
Coastal Brackish Marsh
Transmontane Alkali Marsh
Coastal and Valley Freshwater Marsh
Southern Arroyo Willow Riparian Forest
Southern Willow Scrub
Modoc-Great Basin Cottonwood Willow Riparian
Modoc-Great Basin Riparian Scrub
Mojave Desert Wash Scrub
Engelmann Oak Woodland
Open Engelmann Oak Woodland
Closed Engelmann Oak Woodland
Island Oak Woodland
California Walnut Woodland
Island Ironwood Forest
Island Cherry Forest
Southern Interior Cypress Forest
Bigcone Spruce-Canyon Oak Forest
- S2.2 Active Coastal Dunes
Active Desert Dunes
Stabilized and Partially Stabilized Desert Dunes
Stabilized and Partially Stabilized Desert Sandfield
Mojave Mixed Steppe
Transmontane Freshwater Marsh
Coulter Pine Forest
Southern California Fellfield
White Mountains Fellfield
- S2.3 Bristlecone Pine Forest
Limber Pine Forest

APPENDIX D

2009 SOLID WASTE DISPOSAL SUMMARY REPORTS BY FACILITIES

County of Los Angeles
July 8, 2010



Solid Waste Disposal Summary Reports by Facilities (Including Out-of-County Imports) By All Jurisdictions

Reporting Period: January 2009 to December 2009

County	Jurisdiction	Antelope Valley Public Landfill #2 (TONS)	Azusa Land Reclamation (TONS)	Calabasas Landfill (TONS)	Chiquita Canyon Landfill (TONS)	City of Burbank Landfill #3 (TONS)	Commerce Refuse-to-Energy Facility (TONS)	Lancaster Landfill (TONS)	Pebble Beach Landfill (TONS)	Puente Hills Landfill (TONS)	San Clemente Landfill (TONS)	Savage Canyon Landfill (TONS)	Schoff Canyon Landfill (TONS)	Southeast Resource Recovery Facility (TONS)	Sunshine Canyon City/County Landfill (TONS)	Total
ALAMEDA COUNTY	ALAMEDA		55.22													55.22
	ALAMEDA COUNTY		59.74													59.74
	BERKELEY		46.10													46.10
	DUBLIN		227.99													227.99
	FREMONT		224.18													224.18
	HAYWARD		154.23													154.23
	LIVERMORE		91.81													91.81
	NEWARK		81.89													81.89
	OAKLAND		120.95													120.95
	PLEASANTON		47.13													47.13
	SAN LEANDRO		97.80													97.80
	UNION CITY		155.40													155.40



Solid Waste Disposal Summary Reports by Facilities (Including Out-of-County Imports) By All Jurisdictions

Reporting Period: January 2009 to December 2009

County	Antelope Valley Public Landfill #2 (TNS)	Azusa Land Reclamation (TNS)	Calabasas Landfill (TNS)	Chiquita Canyon Landfill (TNS)	City of Burbank Landfill #3 (TNS)	Commerce Refuse-to-Energy Facility (TNS)	Lancaster Landfill (TNS)	Pebble Beach Landfill (TNS)	Puente Hills Landfill (TNS)	San Clemente Landfill (TNS)	Savage Canyon Landfill (TNS)	Scholl Canyon Landfill (TNS)	Southeast Resource Recovery Facility (TNS)	Sunshine Canyon City/County Landfill (TNS)	Total
ALAMEDA COUNTY		1,382.44													1,382.44
AMADOR COUNTY		17.15													17.15
		31.26													31.26
		48.41													48.41
BUTTE COUNTY		77.81													77.81
		23.50													23.50
		11.00													11.00
		112.31													112.31
CALAVERAS COUNTY		1.78													1.78
		1.78													1.78
CONTRA COSTA COUNTY		186.10													186.10
													0.94		0.94
		238.12													238.12



Solid Waste Disposal Summary Reports by Facilities (Including Out-of-County Imports) By All Jurisdictions

Reporting Period: January 2009 to December 2009

	Antelope Valley Public Landfill #2 (TONS)	Azusa Land Reclamation (TONS)	Calabasas Landfill (TONS)	Chiquita Canyon Landfill (TONS)	City of Burbank Landfill #3 (TONS)	Commerce Refuse-to-Energy Facility (TONS)	Lancaster Landfill (TONS)	Pebble Beach Landfill (TONS)	Puente Hills Landfill (TONS)	San Clemente Landfill (TONS)	Savage Canyon Landfill (TONS)	Scholl Canyon Landfill (TONS)	Southeast Resource Recovery Facility (TONS)	Sunshine Canyon City/County Landfill (TONS)	Total
CONTRA COSTA COUNTY		15.25					0.49								15.74
DANVILLE		39.85													39.85
EL CERRITO		17.09													17.09
LAFAYETTE		49.33													49.33
MARTINEZ		12.12													12.12
PINOLE		57.09													57.09
PITTSBURG		70.38													70.38
PLEASANT HILL		49.43													49.43
RICHMOND		96.09													96.09
SAN RAMON		124.50													124.50
WALNUT CREEK		136.88													136.88
Total		1,064.23					0.49						0.94		1,065.66
EL DORADO COUNTY		90.62													90.62



Solid Waste Disposal Summary Reports by Facilities (Including Out-of-County Imports) By All Jurisdictions

Reporting Period: January 2009 to December 2009

Jurisdiction	Antelope Valley Public Landfill #2 (TONS)	Azusa Land Reclamation (TONS)	Calabasas Landfill (TONS)	Chiquita Canyon Landfill (TONS)	City of Burbank Landfill #3 (TONS)	Commerce Refuse-to-Energy Facility (TONS)	Lancaster Landfill (TONS)	Pebble Beach Landfill (TONS)	Puente Hills Landfill (TONS)	San Clemente Landfill (TONS)	Savage Canyon Landfill (TONS)	Scholl Canyon Landfill (TONS)	Southeast Resource Recovery Facility (TONS)	Sunshine Canyon City/County Landfill (TONS)	Total
ARCADIA		2,006.72		2,585.93		2,557.98	97.28		28,188.18				3,406.59	5,092.20	43,944.88
ARTESIA		87.64				11.24			1,020.95				84.28	2,206.44	3,412.55
AVALON		14.28						3,197.94						212.31	3,424.53
AZUSA		7,839.88		27.38		56.49	10.51		33,099.76				247.86	48.81	41,290.49
BALDWIN PARK		1,016.59		4.59		1,468.50	142.64		19,074.86				1,328.56	3.00	23,038.54
BELL		11.65		1,386.19		906.64	1.33		3,081.31				4,059.14	5,332.23	14,778.49
BELL GARDENS		52.70		531.53		162.24	4.40		25,946.75		19.85		72.37	4,233.78	31,023.62
BELLFLOWER		83.66		264.96		18.53			20,903.87		513.51		11,550.30	1,261.16	34,575.99
BEVERLY HILLS		86.08		29,979.07		0.72	116.72		9,306.18					34.42	39,523.19
BRADBURY		9.09							3,984.26					1.08	3,994.43
BURBANK		193.13		23,898.98	37,711.46	34.02	1,791.53		11,444.79				47.97	12,347.01	87,466.89
CALABASAS		26.26	34,599.28	701.33		1.67	6.77		162.55					58.67	35,556.53



Solid Waste Disposal Summary Reports by Facilities (Including Out-of-County Imports) By All Jurisdictions

Reporting Period: January 2009 to December 2009

	Antelope Valley Public Landfill #2 (TONS)	Azusa Land Reclamation (TONS)	Calabasas Landfill (TONS)	Chiquita Canyon Landfill (TONS)	City of Burbank Landfill #3 (TONS)	Commerce Refuse-to-Energy Facility (TONS)	Lancaster Landfill (TONS)	Pebble Beach Landfill (TONS)	Puente Hills Landfill (TONS)	San Clemente Landfill (TONS)	Savage Canyon Landfill (TONS)	Scholl Canyon Landfill (TONS)	Southeast Resource Recovery Facility (TONS)	Sunshine Canyon City/County Landfill (TONS)	Total
LOS ANGELES COUNTY	848.38	292.98		605.77		163.38	2,327.58		163,587.86				0.37	2,392.54	170,218.86
		184.27		2.67		2,863.65	1.13		15,654.84				4,300.83	133.87	23,141.26
		47.28		5.71		0.09	48.69		3,446.74						3,548.51
	28,400.23	59.82		2,429.79		7,754.85	110.54		52,146.25					11,868.00	103,569.48
		737.76		10,662.96		879.10	14.41		19,475.26				15,828.73	49,080.95	96,779.17
		139.81		113.47		1,981.96	4.98		38,146.14				208.26	228.38	40,823.00
		104.23		1,921.54			123.10		1,612.68				25.78	8,119.98	11,907.21
		99.61		29,931.91		0.01	633.61		14,990.02				4,250.28	710.92	50,616.36
		61.23		3.84		15.04			18,936.87					1.69	19,018.67
		222.59		30.49		5,828.62	8.79		55,998.74					163.29	62,053.52
		276.51		4.15		25.14	184.09		18,977.33					4.43	19,471.65
		3,261.63		30.44		116.99	17.65		88,634.39					51.64	93,112.64



Solid Waste Disposal Summary Reports by Facilities (Including Out-of-County Imports) By All Jurisdictions

Reporting Period: January 2009 to December 2009

	Antelope Valley Public Landfill #2 (TONS)	Azusa Land Reclamation (TONS)	Calabasas Landfill (TONS)	Chiquita Canyon Landfill (TONS)	City of Burbank Landfill #3 (TONS)	Commerce Refuse-to-Energy Facility (TONS)	Lancaster Landfill (TONS)	Pebble Beach Landfill (TONS)	Puente Hills Landfill (TONS)	San Clemente Landfill (TONS)	Savage Canyon Landfill (TONS)	Scholl Canyon Landfill (TONS)	Southeast Resource Recovery Facility (TONS)	Sunshine Canyon City/County Landfill (TONS)	Total
LOS ANGELES COUNTY		8699		3,763.18		492.68	190.30		10,755.98				7.80	14,637.61	29,934.54
		120.72		2,825.01		3,287.47	249.82		66,915.60				7.66	6,897.89	80,404.17
		1,297.00		11,121.23		83.26	1,751.65		21,924.54			115,263.38		12,790.16	164,323.22
		371.14		6.63		36.05	33.01		35,762.70						36,211.53
		28.28				0.61	3.53		1,179.21					874.63	2,086.26
		123.99		2,469.03		164.40	7.74		8,151.75				13,119.84	46,210.14	70,246.89
		1.44		3,218.31					1,194.21				1,728.33	9,752.63	15,884.92
				24.85		0.07			6.84					5.48	1,626.02
		50.62		4,170.16		0.36	9.06		12,427.01				5,966.44	18,957.65	41,601.30
		534.21		725.09		84.56	165.56		96,400.33					1,377.31	99,287.06
		458.52		253.69		2.23	84.71		6,002.60				249.82	780.30	7,832.07
		5,423.97		187.60		186.40	56.30		32,194.66				42.64	3.07	38,094.64



Solid Waste Disposal Summary Reports by Facilities (Including Out-of-County Imports) By All Jurisdictions

Reporting Period: January 2009 to December 2009

	Antelope Valley Public Landfill #2 (TONS)	Azusa Land Reclamation (TONS)	Calabasas Landfill (TONS)	Chiquita Canyon Landfill (TONS)	City of Burbank Landfill #3 (TONS)	Commerce Refuse-to-Energy Facility (TONS)	Lancaster Landfill (TONS)	Pebble Beach Landfill (TONS)	Puente Hills Landfill (TONS)	San Clemente Landfill (TONS)	Savage Canyon Landfill (TONS)	Scholl Canyon Landfill (TONS)	Southeast Resource Recovery Facility (TONS)	Sunshine Canyon City/County Landfill (TONS)	Total
LOS ANGELES COUNTY		50.81		2,933.55		178.67	300.06		1,216.13			2,951.28	1,912.39	9,076.56	18,622.45
LA CANADA FELINTRIDGE															
LA HABRA HEIGHTS						8.07			4,458.22						4,466.29
LA MIRADA		201.17		0.82		146.28			8,452.81		0.43			1,731.84	10,533.35
LA PUENTE		1,089.30				66.74	0.97		38,602.02					2.12	39,733.15
LA VERNE		55.27				3.64			4,600.22					1.02	4,684.70
LAKEWOOD		130.31				17.20	12.84		4,563.10				42,140.62	2,445.27	49,356.87
LANCASTER	18,111.28	303.25		5.40			94,746.72		935.64					4.252	114,143.81
LAWDALE		221.37		2,620.28		0.17	12.01		2,360.38				4,296.20	8,847.84	18,360.25
LOMITA		121.34		31.88		395.07	6.62		3,478.47				9,051.94	895.76	13,981.08
LONG BEACH		2,949.06		6,615.23		542.14	1,496.19		77,859.01				208,718.22	65,432.83	363,612.68
LOS ANGELES	1,779.68	15,618.68	170,053.47	285,403.69		27,679.24	107,564.15		205,346.66			926.59	31,361.19	1,608,156.96	2,454,110.31
LOS ANGELES COUNTY	57,491.07	625.62	20,214.98	68,290.37		932.27	12,770.55		433,545.33	337.00	4,050.68	24,565.62	384.65	174,560.40	797,788.54



Solid Waste Disposal Summary Reports by Facilities (Including Out-of-County Imports) By All Jurisdictions

Reporting Period: January 2009 to December 2009

	Antelope Valley Public Landfill #2 (TONS)	Azusa Land Reclamation (TONS)	Calabasas Landfill (TONS)	Chiquita Canyon Landfill (TONS)	City of Burbank Landfill #3 (TONS)	Commerce Refuse-to-Energy Facility (TONS)	Lancaster Landfill (TONS)	Pebble Beach Landfill (TONS)	Puente Hills Landfill (TONS)	San Clemente Landfill (TONS)	Savage Canyon Landfill (TONS)	Scholl Canyon Landfill (TONS)	Southeast Resource Recovery Facility (TONS)	Sunshine Canyon City/County Landfill (TONS)	Total
LYNWOOD		288.81		321.85		5.50	7.81		7,088.98				9,324.90	10,555.60	27,603.25
MALIBU		20.14	22,026.21	171.81			50.71		802.17					213.77	23,284.81
MANHATTAN BEACH		151.69		696.22		28.29	23.31		7,871.08				1,844.72	499.64	11,314.94
MAYWOOD		31.11		728.39		942.27	1.14		3,882.55				665.55	9,704.45	15,955.46
MONROVIA		1,981.87		571.79		550.69	4.41		28,742.18				1,834.78	2,838.23	38,301.95
MONTEBELLO		183.87		2,732.65		708.27	27.05		57,637.19				118.50	4,720.39	66,127.92
MONTEREY PARK		104.66		5,001.31		244.51	196.29		35,982.04				201.23	542.65	42,252.69
NORWALK		103.19		91.28		67.05	10.71		8,953.85		2,584.76		4,948.78	10,859.67	27,619.29
PALMDALE	95,850.36	277.00		39.27			8,559.92		15.72					45.61	104,787.88
PALOS VERDES ESTATES		2.87		663.54		10.58	9.46		9,051.32				214.47	856.00	10,808.24
PARAMOUNT		85.65		359.32		560.23	149.75		5,119.33				3,356.11	838.01	10,488.40
PASADENA	2.01	628.00		4,936.02		1,581.78	500.67		28,835.17			106,974.40	7,256.52	7,554.31	158,270.88



Solid Waste Disposal Summary Reports by Facilities (Including Out-of-County Imports) By All Jurisdictions

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Jurisdiction	Antelope Valley Public Landfill #2 (TONS)	Azusa Land Reclamation (TONS)	Calabasas Landfill (TONS)	Chiquita Canyon Landfill (TONS)	City of Burbank Landfill #3 (TONS)	Commerce Refuse-to-Energy Facility (TONS)	Lancaster Landfill (TONS)	Pebble Beach Landfill (TONS)	Puente Hills Landfill (TONS)	San Clemente Landfill (TONS)	Savage Canyon Landfill (TONS)	Scholl Canyon Landfill (TONS)	Southeast Resource Recovery Facility (TONS)	Sunshine Canyon City/County Landfill (TONS)	Total
LOS ANGELES COUNTY		303.39		42.29		1,922.83	4.18		59,799.35					356.46	62,428.50
		848.28		50.13		135.06	2.65		83,798.54					460.19	85,294.85
		103.01		275.34		0.50	46.31		2,687.03				1,827.32	2,810.13	7,549.64
	0.11	486.54		5,256.81		5.53	41.32		7,020.64				13,377.64	13,238.35	39,427.14
		5.83		84.27		0.67	3.68		1,290.92					2,052.45	3,437.72
				57.70			17.07		1,944.81					1,366.62	3,386.20
		284.54		3,483.09		3,745.44	2.70		12,892.55				1,206.36	22,423.04	44,027.72
		136.30		3.02		2.45			7,211.48						7,353.25
		78.60		14,632.73		55.33	101.74		3,373.86					1,009.47	19,251.73
		113.39		3,101.08		2,013.11	3.71		24,805.92				1,339.92	56.12	31,432.95
		49.11		1,441.76		121.58	83.08		8,629.82				205.68	11.12	11,688.07
		656.76		94,325.56		0.04	991.74		314.55					3,264.92	126,210.22



Solid Waste Disposal Summary Reports by Facilities (Including Out-of-County Imports) By All Jurisdictions

Reporting Period: January 2009 to December 2009

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LOS ANGELES COUNTY															
SANTA FE SPRINGS		18,727.29		2,570.89		1,754.87			35,028.36		16,923.87		11.96	7,353.58	82,370.82
SANTA MONICA		469.89		6,721.86		15,616.30	826.32		73,242.75				2,206.57	2,096.46	101,182.15
SIERRA MADRE		1.67		123.74		659.66	0.99		3,813.51			3,270.40	516.66		8,386.63
SIGNAL HILL		11,539.56		404.52		4.02	2.97		431.72				5,019.36	2,810.35	20,212.52
SOUTH EL MONTE		380.25		3,923.55		22.41			27,572.76				342.77	3.44	32,245.18
SOUTH GATE		179.03		32.96		2,882.76	276.64		57,039.51				1,132.17	87.35	61,630.42
SOUTH PASADENA				2,342.36		439.49	2.81		10,842.09			2,283.09		6.70	16,500.50
TEMPLE CITY				2,892.66		37.58	0.44		22,423.85					4.80	25,404.76
TORRANCE		265.78		5,786.80		223.06	287.66		25,009.27				19,343.01	75,939.23	127,537.59
VERNON		35,508.22		5,094.64		2,265.36	1,439.99		54,125.56				18.61	71,586.58	170,120.73
WALNUT		438.84		5.04		2.87	12.73		7,380.73						7,840.21
WEST COVINA		251.86		276.40		77.02	16.18		63,746.68					10.19	64,378.33



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LOS ANGELES COUNTY		7.27		3,763.23		32.23	437.55		20,582.40					3,166.18	27,988.86
		56.10	4,138.83	95.51		0.63	0.63		3.76					9.42	4,304.35
		674.89		851.46		73.06	33.46		54,177.03		50,927.93			3,119.51	109,857.34
	265,943.75	87,390.37	259,558.49	674,388.63	37,711.46	95,885.96	239,285.66	3,197.84	2,612,978.13	337.00	75,021.03	257,980.68	441,122.81	2,352,946.70	7,403,141.61
MADERA COUNTY		24.29													24.29
		60.90													60.90
		85.19													85.19
MARIN COUNTY		14.54													14.54
		125.25													125.25
		91.02													91.02
		230.81													230.81
MERCED COUNTY		1.68													1.68
		28.38													28.38



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INDIANA STATE		12.02													12.02
Total		36.93													36.93
ORANGE COUNTY		44.75													44.75
ANAHEIM		593.07		67.80		7.46	5.02		28.19					13.34	714.88
BREA		181.67		25.54		4.42			10.25						221.88
BUENA PARK		152.07		2.03		25.21			190.48					5.65	375.44
COSTA MESA		680.46		63.62		17.08			82.46				3,397.06	7.76	4,248.44
CYPRESS		128.78		30.32			0.53		1.21			7.42	60.79		229.05
DANA POINT		1.37					6.78								8.15
FOUNTAIN VALLEY		203.95													203.95
FULLERTON		653.65		12.43		821.07	2.07		149.75					35.33	1,674.30
GARDEN GROVE		372.62		20.30		144.82	0.65		348.74					19.83	906.86
HUNTINGTON BEACH		592.52		38.09		5.43	4.11		32.45					73.00	745.60



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ORANGE COUNTY	20.53	1,565.65		274.60		0.12	24.96		21.23				117.76	3.90	2,028.75
LA HABRA		158.31		9.27		6.72			10.86		27.25		428.21	9.50	650.12
LA PALMA		0.01		3.59		0.01			0.93						4.54
LAGUNA BEACH		8.48											12.48		20.96
LAGUNA HILLS		92.14							20.32						112.46
LAGUNA NIGUEL		137.37													137.37
LAKE FOREST		165.01													165.01
LOS ALAMITOS		38.85		20.82		1.37	9.61		153.75					64.08	288.48
MISSION VIEJO		243.40				0.05			8.34				4,534.06		4,785.85
NEWPORT BEACH		21.95		1.13		0.07	0.91		3.31				7,809.48	1.63	7,838.48
ORANGE		535.41		177.75		3.74			24.16				10,407.47	19.46	11,167.99
ORANGE COUNTY		91.12		90.84		1.09	1.02		7.13				579.61		770.81



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ORANGE COUNTY		10.46													10.46
									0.04				10.21		10.25
RANCHO SANTA MARGARITA															
SAN CLEMENTE		95.90													95.90
SAN JUANCAPISTRANO		121.72				18.85			3.88						144.45
SANTA ANA		1,398.36		41.19		245.62			55.54				2,476.92	83.10	4,300.73
SEAL BEACH		118.17		27.32		292.73			370.27					67.98	876.47
STANTON		181.27				7.29			4.65				9.57		202.78
TUSTIN		242.69		2.81					2.09				146.38		393.97
WESTMINSTER		148.22		5.49					0.16					3.12	156.99
YORBA LINDA		195.16				25.56			126.19						346.91
Total	20.53	9,174.56		914.94		1,628.71	55.66		1,656.38		27.25		29,936.63	466.47	43,883.13
PLACER COUNTY		23.54													23.54
LINCOLN		21.11													21.11



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PLACER COUNTY		30.03													30.03
		337.66													337.66
		412.34													412.34
RIVERSIDE COUNTY		171.04							1.12						172.16
		123.89													123.89
		245.41													245.41
		3.63													3.63
		186.09													186.09
		21.61				229.96			0.47						252.04
		723.66		0.96		0.37			2,119.52						2,856.41
		7.24													7.24
		163.48													163.48
		27.79													27.79



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RIVERSIDE COUNTY		275.07													275.07
INDIO															
LA QUINTA		71.31							0.28						71.59
LAKE ELSINORE		151.83													151.83
MORENO VALLEY		488.16					58.73								556.89
MURRIETA		192.00				0.82									192.82
NORCO		254.19				0.09			654.08						908.36
PALM DESERT		202.84													202.84
PALM SPRINGS		73.26													73.26
PERRIS		288.42							7.06						305.48
RANCHO MIRAGE		6.53													6.53
RIVERSIDE		1,242.41		0.30		719.04			3,546.99						5,508.74
RIVERSIDE COUNTY	462.36	69.66		1.94		1.46	1.30		667.95						1,204.59



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RIVERSIDE COUNTY		34.05					303.10								337.15
		359.59				12.25			3.53						375.37
		5,383.18		3.20		863.99	363.13		7,001.00						14,188.76
SACRAMENTO COUNTY		88.84													88.84
		125.47					0.97								126.44
		210.08													210.08
		699.70				3.02									702.72
		146.60													146.60
		1,270.69				3.02	0.97								1,274.68
SAN BERNARDINO COUNTY	0.55	1.19				1.87	0.38		0.94						4.93
		444.39													444.39
		109.79				230.92	1.22								341.93
		32.68													32.68



Solid Waste Disposal Summary Reports by Facilities (Including Out-of-County Imports) By All Jurisdictions

Reporting Period: January 2009 to December 2009

Jurisdiction	Antelope Valley Public Landfill #2 (TONS)	Azusa Land Reclamation (TONS)	Calabasas Landfill (TONS)	Chiquita Canyon Landfill (TONS)	City of Burbank Landfill #3 (TONS)	Commerce Refuse-to-Energy Facility (TONS)	Lancaster Landfill (TONS)	Pebble Beach Landfill (TONS)	Puente Hills Landfill (TONS)	San Clemente Landfill (TONS)	Savage Canyon Landfill (TONS)	Scholl Canyon Landfill (TONS)	Southeast Resource Recovery Facility (TONS)	Sunshine Canyon City/County Landfill (TONS)	Total
SAN BERNARDINO COUNTY		360.10				276.84			5,147.38				83.65	20.89	5,690.86
CHINO		221.98				7.06			790.16						1,019.20
CHINO HILLS		132.43					1.02		19.84						153.29
COLTON		1,388.52		11.73		470.39			731.03				1,865.26		4,470.93
FONTANA		90.32							5.70						96.02
GRAND TERRACE		231.56					32.34								291.38
HESPERIA	27.48	48.55				4.00			0.96						53.51
HIGHLAND		4.75				6.58			0.95						12.28
LOMA LINDA		251.69					0.79		4,732.22						4,984.70
MONTCLAIR		14.88													14.88
NEEDLES		1,361.66		1.67		164.71	0.40		3,220.41					10.04	4,756.89
ONTARIO		705.04		0.84		12.58			308.94						1,027.40
RANCHO CUCAMONGA															



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SAN BERNARDINO COUNTY	29.02	173.89					1.24						2,853.90		2,853.90
		68.88				59.23			157.22						285.33
SAN BERNARDINO	16.39	1,140.74				42.08	5.29		225.91						1,430.41
SAN BERNARDINO COUNTY	10.84	5,486.91		1.91		17.91	22.33		517.73						6,037.43
TWENTYNINE PALMS		76.59													76.59
UPLAND		151.66							312.03						463.69
VICTORVILLE	2.81	289.13				78.72	22.91		20.43						384.00
YUCAIPA		2.06				242.53			160.17				1,865.20		2,269.96
YUCCA VALLEY		39.39													39.39
Total	86.89	12,788.78		16.15		1,617.42	87.92		16,332.02				6,492.01	30.93	37,452.12
SAN DIEGO COUNTY		139.84					1.10								140.94
CHULA VISTA		235.63													235.63
CORONADO		8.89													8.89



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SAN DIEGO COUNTY		252.88					0.02								252.70
		145.76													145.76
		427.72													427.72
		59.99													59.99
		130.92													130.92
		119.55													119.55
		427.23				24.38									451.61
		186.62													186.62
		1,584.25				132.27			1.95						1,718.47
		360.20				6.91			18.69						385.80
		150.09													150.09
		162.66													162.66



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SAN DIEGO COUNTY		111.90													111.90
		204.80													204.80
		4,708.73				163.56	1.12		20.64						4,894.05
SAN FRANCISCO COUNTY		319.29													319.29
		319.29													319.29
SAN JOAQUIN COUNTY		2.16													2.16
		5.45													5.45
		41.87													41.87
		44.59													44.59
		353.92													353.92
		135.77													135.77
		583.76													583.76
SAN LUIS OBISPO COUNTY	19.41						26.59								46.00



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STATE		11.76													11.76
	TEXAS STATE														
	UTAH STATE		6.11												6.11
	Total		3,126.77												3,126.77
SUTTER COUNTY															60.52
	YUBA CITY		60.52												60.52
	Total		60.52												60.52
TULARE COUNTY													2,922.47		2,922.47
	CONSOLIDATED WASTE MANAGEMENT AUTHORITY														
	DINUBA		12.08												12.08
	EXETER												40.91		40.91
	FARMERSVILLE												88.56		88.56
	PORTERVILLE		66.38												66.38
	TULARE		36.29												36.29
	TULARE COUNTY												9,085.98		9,085.98
	VISALIA		116.85												116.85



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TULARE COUNTY		231.60											12,137.92		12,369.52
TUOLUMNE COUNTY		17.94													17.94
TUOLUMNE COUNTY		0.57													0.57
Total		18.51													18.51
VENTURA COUNTY		179.36		25.52											204.88
FILMORE		19.70		147.62											167.32
MOORPARK		1.69													1.69
OJAI				173.90											173.90
OXNARD		256.39		74.87											333.26
PORT HUENEME		6.52					13.26								19.78
SANTA PAULA		5.68		396.02											401.70
SIMI VALLEY	67.59	262.32		98.55			1.09							11.46	441.01
THOUSAND OAKS	37.42	275.54	9,712.84	16.97			0.28		0.05					5.44	10,048.54





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VENTURA COUNTY	3,114	237.75		82.15											3,510.4
		7.93	4,575.83	11,394.54		0.03			215.17					49.79	16,243.29
		1,254.89	14,288.67	12,410.14		0.03	14.63		215.22					66.69	28,386.41
YOLO COUNTY		20.83													20.83
		17.98													17.98
		92.68													92.68
		131.49													131.49
		14.03													14.03
		14.03													14.03
		137,279.02	273,847.16	687,713.06	37,711.46	100,265.69	253,086.07	3,197.84	2,636,223.39	337.00	75,048.28	257,390.66	489,660.37	2,353,513.73	7,574,048.83
Total	266,742.88	137,279.02	273,847.16	687,713.06	37,711.46	100,265.69	253,086.07	3,197.84	2,636,223.39	337.00	75,048.28	257,390.66	489,660.37	2,353,513.73	7,574,048.83



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1. Solid waste quantities listed above are reported to the County of Los Angeles Department of Public Works by permitted solid waste facility operators located in Los Angeles County pursuant to the California Public Resources Code, Section 41821.5, and the California Code of Regulations, Sections 18800-18813. The County of Los Angeles Department of Public Works is not responsible for the accuracy of the data reported by the solid waste facility operators. Questions regarding this report may be directed to the County of Los Angeles Department of Public Works at (800) 320-1771, Monday through Thursday 7:00 A. M. to 5:30 P. M. Questions regarding specific data listed from a facility should be directed to the receiving facility.
2. Pursuant to CCR Section 18720, permitted Solid Waste Facility is defined as "a solid waste facility for which there exists a Solid Waste Facility Permit issued by the local enforcement agency and concurred by the California Integrated Waste Management Board, or which is permitted under the regulatory scheme of the another state."
3. Facilities located outside of Los Angeles County that received waste generated from jurisdictions located within Los Angeles County will report that waste to the county in which the receiving facility is located. Subsequently, that county will forward the information to the appropriate jurisdictions.
4. The reported information was compiled without any assessment, modification, or alteration based on data provided to this office by the operators of the solid waste facilities located in the Los Angeles County.

Report last updated on May 27, 2010, up to 4th Quarter 2009 data.

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