FINAL
SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

EL SOBRANTE LANDFILL SOLID WASTE FACILITY PERMIT REVISION

(STATE CLEARINGHOUSE NO. 2007081054)

Lead Agency:

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March 31, 2009

Errata Sheet

Background

In accordance with the California Equality Act (CEQA), a Supplemental Environmental Impact Report (SEIR) was prepared to assess potential environmental impacts associated with the El Sobrante Solid Waste Facility Permit Revision. The draft SEIR was circulated on December 22, 2008, for public review and comment. The public review period ended on February 4, 2009. During the public review period, the Riverside County Waste Management Department (RCWMD) received comment letters from a number of interested individuals and agencies. Based on the comment letters received, it was determined that corrections to the SEIR were necessary due to typographical or other minor errors. This Errata Sheet is intended to summarize the changes that occurred between the Public Review Draft SEIR and the Final SEIR document.

Revisions to the Final SEIR Text

The following text changes are incorporated as part of the Final SEIR for the Project. Original text from the Public Review Draft SEIR is presented below in *italics*. Deletions are indicated by ~~*strikethrough*~~ text and insertions are indicated by *underlined* text.

S.0 Summary

Section S.1.3, *Project Objectives*, page S-2

SEIR Section S.1.3, page S-2, was revised to correct a typographic error.

> *The El Sobrante Landfill Project objectives are as follows:*
>
> - *Provide greater flexibility in landfill operations to meet the disposal needs of the regional waste system;*
> - *Improve solid waste management services to southern California customers;*
> - *Increase operational efficiencies in anticipation of meeting future waste disposal needs of both western Riverside County and other non-County users; and*
> - *Reduce the amount of daily peak hour trips associated with the Project site.~~; and~~*

Section S.1.5.C, *Environmental Analysis – Noise*, page S-3

A minor revision to SEIR Section S.1.5.C, page S-3, was necessary to ensure consistency with revisions made to SEIR Section 4.3 (as described below) and to correct a typographic error.

> *This SEIR includes an analysis of potential noise impacts related to the Project. As discussed in SEIR Section 4.3, Noise, the proposed Project would result in the addition of approximately 0.7~~2.4~~ dBA CNEL, which is considered less than a "barely perceptible" increase. As such, the Project would not result in a significant increase in noise levels and no new mitigation would be required. In addition, the nearest sensitive land uses would not be ~~in~~ exposed to significant increases in noise levels.*

Section S.2, *Areas of Concern*, page S-4

A minor correction to Section S.2, page S-4, was made to accurately describe the date of distribution for the NOP.

> *A Notice of Preparation (NOP) for this SEIR was distributed on August 9~~April 12~~, 2007 to Responsible Agencies and the public for a 30-day public review and comment period and is included as Appendix A to this SEIR.*

Table S-1, *Expansion EIR Mitigation Measures Still in Effect*, page S-8

Mitigation Measure A-7 was revised to incorporate amended mitigation language that was previously adopted as part of the 1st Amendment to the Second Agreement.

> *A plan that assures the removal of litter associated with the proposed project shall be approved by the CIWMB prior to the issuance of a SWFP. USA Waste or its successor-in-interest shall be responsible for the control and cleanup of litter and debris from the landfill and/or waste-hauling vehicles along the landfill access road to its intersection with Temescal Canyon Road, and along Temescal Canyon Road ~~between the landfill access road and~~ from the intersection of Interstate 15 (1-15) to the intersection with ~~and Temescal Canyon~~ Weirick Road. At a minimum, USA Waste or its successor-in-interest shall inspect and remove litter and debris from these roadways on a weekly basis and within 48 hours upon receipt of notice of complaint. (Board of Supervisors)*

4.3 Noise

In response to a comment letter received during the public review period it was determined that there was a mathematical error in the Project Noise Analysis. Tables 5-2 and 5-3 from the Noise Analysis (SEIR Technical Appendix C) depict the existing ambient long-term noise levels for Locations "A," "B," and "C." The data presented for Locations "A" and "B" were mistakenly reversed. Because the calculations of noise impacts to nearby sensitive receptors were based upon the existing ambient noise levels, revised calculations were performed as part of an addendum letter to the Noise Analysis to more accurately describe potential noise effects to nearby sensitive receivers. The Noise Analysis Addendum, dated February 10, 2009, is provided as Appendix C1 to the Final SEIR.

As documented in the noise analysis addendum, the nearest sensitive receivers are located approximately 3,600 feet to the south of landfill operations, and these uses are separated from the landfill by rolling hills extending approximately 500 feet above the floor of Dawson Canyon. The revised calculations have determined that, with considerations for topography, the "project only" noise level would be approximately 40.0 dBA Leq. When combined with the existing ambient noise level of 47.9 dBA Leq, total noise levels would be 48.6 dBA Leq at the nearest noise sensitive use, representing an increase of only 0.7 dBA. An increase of 0.7 dBA Leq is less than the 3.0 dBA that is considered to be "barely perceptible." These findings are generally consistent with the findings disclosed in the Public Review Draft SEIR, which disclosed a total noise increase of 2.4 dBA Leq.

The following summarizes the revisions made to Section 4.3 pursuant to the Noise Analysis Addendum.

Section 4.3, *Noise,* Page 4.3-1 (first paragraph)

A Noise Analysis was prepared for the Project by Urban Crossroads, dated April 16, 2008, and a subsequent addendum to the Noise Analysis was prepared for the Project by Urban Crossroads, dated February 10, 2009. ~~A c~~Copies~~y~~ of the technical report and the addendum letter are~~is~~ included as Appendix C and Appendix C1 to this SEIR, respectively..

Table 4.3-2, *Measured Existing Long-Term Noise Levels,* page 4.3-4

Observed Location	Description	Primary Noise Source	Daytime Noise Level (Leq dBA) 7AM – 7PM	Nighttime Noise Level (Leq dBA) 7PM – 7 AM
A	*Located at the nearest noise sensitive residences to the south of the El Sobrante Landfill.*	*Ambient Noise*	*47.1 - 51.1~~52.3 - 56.1~~*	*47.9 - 50.5~~50.0 - 58.1~~*
B	*Located 100 feet north of the Clay Canyon Drive centerline near the existing cement piping factory.*	*Traffic on Clay Canyon Drive and operations at the cement piping factory.*	*52.3 - 56.1~~47.1 - 51.1~~*	*50.0 - 58.1~~47.9 - 50.5~~*
C	*Located 100 feet west of the El Sobrante Access centerline south of the landfill facility.*	*Traffic on the El Sobrante Access Road*	*53.7 - 61.5*	*50.4 - 60.3*

Source: Urban Crossroads, 2009~~8~~.

Section 4.3.3.1, *No Impacts/Less Than Significant Impacts*, page 4.3-5

The noise sensitive uses nearest to the Project site are the rural single family homes located in Dawson Canyon, approximately 3,600 feet south of the site. These homes are located within the Canyon and have their line of sight to the Landfill obstructed by rolling hills that reach up to 500 feet above the Canyon floor. These intervening hills serve as natural noise barriers and attenuate noise levels generated at the site. As depicted in Table 4.3-3, Project Noise Contributions (12:00 Midnight – 4:00AM), when intervening topography and geometric spreading (i.e., the dissipation of the intensity of noise over a distance) are taken into consideration, the Project site would emit noise levels of approximately 40.0 dBA CNEL at the Dawson Canyon rural residences.

As shown below in Table 4.3-3, Project Noise Contributions (12:00 Midnight – 4:00AM), when combined with existing ambient noise levels, the proposed Project would result in exterior noise levels of approximately 48.6~~52.4~~ dBA CNEL at the Dawson Canyon rural residences, referred to as Location "A," between the hours of 12:00 Midnight and 4:00AM. As shown above in Table 4.3-3, the existing noise levels at Location "A" range from 47.9 to 50.5~~50.0 to 58.1~~ dBA CNEL without the proposed Project. As such, the Project would result in an increase of no more than 0.7~~2.4~~ dBA CNEL. An increase in noise levels of less than three (3) dBA CNEL is considered "barely perceptible," and as such, a substantial increase in noise levels would not occur with implementation of the proposed Project. ~~Additionally, the homes at Location "A" are located in a canyon surrounded by rolling hills that reach up to 500 feet above the canyon floor, further reducing estimated noise levels due to intervening topographic features.~~

Table 4.3-3, *Project Noise Contributions (12:00 Midnight – 4:00 AM)*, page 4.3-6

Location	Condition	Exterior Noise Levels (Leq dBA)
A	*Project Only Noise Total*	*40.0~~8.6~~*
	Existing Ambient Noise Level	*47.9~~50.0~~*
	Combined Project & Ambient Noise Level	*48.6~~52.4~~*
	Project Contribution	***0.7~~2.4~~***
County of Riverside Nighttime Residential Noise Standard		*45.0*

Source: Urban Crossroads, 2009~~8~~.

Section 4.3.4, *Cumulative Analysis*, page 4.3-6

As described in the above analysis, traffic noise associated with the proposed Project would result in a worst-case noise level increase of 0.7~~2.4~~ dBA CNEL at the homes along Dawson Canyon Road.

Section 4.3.5, *Significance of Impacts Prior to Mitigation*, page 4.3-7

The proposed Project would result in the addition of approximately 0.7~~2.4~~ dBA CNEL, which is considered less than "barely perceptible" and as such, the Project would not result in a substantial increase in noise levels.

Section 4.4 Public Health and Safety

Pursuant to comments from the Riverside County Fire Department, minor corrections were made to SEIR Section 4.4, *Public Health and Safety*. These minor corrections did not affect any of the conclusions in SEIR Section 4.4 as to the significance of Project impacts.

Section 4.4.1.5, *Fire Hazard Controls*, page 4.4-4

The El Sobrante Landfill site is located within a high fire hazard area of the County and is classified as a Category III~~I~~ project, which requires a fire station within three (3) miles or a 12-minute response time.

Section 4.4, *Cumulative Impact Analysis*, page 4.4-7

Lastly, because the proposed Project would not physically modify the existing landfill site, and because the Expansion SEIR concluded that the landfill would not result in a significant impact to fire hazards on a Project-specific or cumulative level, the proposed Project also would not result in a significant cumulative impact due to fire hazards.

CEQA Requirements

State CEQA Guidelines §15088.5(a) requires that a lead agency recirculate an environmental impact report when significant new information is added to the SEIR following conclusion of the public review and comment period but before certification of the SEIR. As stated in the CEQA Guidelines §15088.5(a), "New information added to an SEIR is not 'significant' unless the SEIR is changed in a way that deprives the public a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect."

As noted above, revisions to the Final SEIR would correct a simple mathematical error in the Project Noise Analysis and would also correct several minor typographic errors. Changes made to the SEIR as a result of public comments were not significant enough so as to deprive the public a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. None of the revisions described above resulted in the disclosure of new information, the identification of any new significant impacts, substantial increases in the severity of identified impacts, or the need for new mitigation measures. Accordingly, recirculation of the SEIR for the Project is not required pursuant to CEQA Guidelines §15088.5(a).

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

February 5, 2009

Ryan Ross
Riverside County Waste Management Department
14310 Frederick Street
Riverside, CA 92553

Subject: El Sobrante Landfill Solid Waste Facility Permit Revision Project
SCH#: 2007081054

Dear Ryan Ross:

The State Clearinghouse submitted the above named Supplemental 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 February 4, 2009, 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

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

SCANNED #74929
BY: KNK
Date: 2/11/09

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
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Document Details Report
State Clearinghouse Data Base

SCH#	2007081054
Project Title	El Sobrante Landfill Solid Waste Facility Permit Revision Project
Lead Agency	Riverside County
Type	SIR Supplemental EIR
Description	The project is a proposal to revise the El Sobrante Landfill Solid Waste Facility Permit to: 1) Extend the hours at the gate for waste delivery by four (4) hours, thus allowing for acceptance of material for a continuous 24-hour period; (2) Change the maximum disposal tonnage limits from a daily limit of 10,000 tons per day (tpd) to a weekly limit of 70,000 tons per week.

Lead Agency Contact

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City	Riverside *State* CA *Zip* 92553

Project Location

County	Riverside
City	Corona
Region	
Lat / Long	33° 47' 52" N / -117° 27' 51" W
Cross Streets	Temescal Canyon Road and Dawson Canyon Road
Parcel No.	283-090-014, -015; 283-080-007, etc
Township	4S *Range* 6W *Section* 19,23 *Base* SBBM

Proximity to:

Highways	I-15
Airports	No
Railways	No
Waterways	No
Schools	No
Land Use	Landuse: Public Facility (PF) Zoning: Residential Agricultural-10 acre minimum (R-A-10), Rural Residential (R-R) and Light Agriculture-one acre minimum (A-1-1) General Plan: Existing Landfill

Project Issues Aesthetic/Visual; Air Quality; Cumulative Effects; Noise; Traffic/Circulation

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 6; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 8; Air Resources Board, Major Industrial Projects; Regional Water Quality Control Board, Region 8; Department of Toxic Substances Control; Native American Heritage Commission; Integrated Waste Management Board

Date Received 12/22/2008 *Start of Review* 12/22/2008 *End of Review* 02/04/2009

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

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File Number: 88888-188/ .
Total pages including cover sheet: 11

Subject: Comments on the Draft Supplemental Environmental Impact Report for the El Sobrante Solid Waste Facility Permit Revision

Comments:

Please see the attached correspondence. If you should have any questions, please do not hesitate to contact our office.

Original will: ☐ be sent via mail ☐ be sent via messenger ☐ be sent via fedex/courier ☑ not be sent

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Via Facsimile (951) 486-3205

February 4, 2009

Mr. Ryan Ross, Planner IV
Riverside County Waste Management
Department
14310 Frederick Street
Moreno Valley, CA 92553

Re: Comments on the Draft Supplemental Environmental Impact Report for the El Sobrante Solid Waste Facility Permit Revision

Dear Mr. Ross:

On behalf of our client, Temescal Heights-8 LLC ("Temescal Heights") we offer these comments on the Draft Supplemental Environmental Impact Report ("SEIR") for the El Sobrante Solid Waste Facility (the "Landfill") Permit Revision Project (the "Project"). Temescal Heights and its affiliates, including Temescal Canyon Properties-8, LLC, own properties nearby the Landfill. Temescal Heights has several concerns regarding the analysis presented in the SEIR, and asserts that the SEIR violates the California Environmental Quality Act ("CEQA") for several reasons, all of which are discussed in greater detail in the comments that follow. A-1

Prior Commitment to the Project

The SEIR is defective because of the Board of Supervisors' action on March 13, 2007, committing to the Second Amendment to Landfill Agreement subject to subsequent CEQA review. As pointed out in its letter to the Board from Josh Gottheim, delivered January 30, 2007, CEQA review cannot be conducted appropriately if the lead agency has so committed to the project in advance that the legislative body cannot impartially or objectively consider the analysis. *See Laurel Heights Improvement Assn. v. Regents of the Univ. of California*, 47 Cal. 3d 376 (1988) (Agencies may not pre-commit to carrying out a proposed action because "[a] fundamental purpose of [CEQA review] is to provide decision makers with information they can use in deciding *whether* to approve a proposed project, not to inform them of the environmental effects of projects that they have already approved.) (italics in original); *see also Save Tara v. City of West Hollywood*, 45 Cal. 4th 116 (2008). This defect can only be cured, if at all, by vacating the prior Board action and re- A-2

A-1 Comment is acknowledged; please refer to Responses A-2 through A-33 below.

A-2 The Second Amendment specifically provides that the County and regulatory agencies having jurisdiction over the operation of the El Sobrante Landfill retain their full discretion to approve, modify, or deny the revisions to the landfill operations contemplated in the Second Amendment and evaluated in the SEIR. While the Second Amendment allows USA Waste to pursue the approvals and permits necessary to implement the revisions to landfill operations, the Second Amendment does not give USA Waste any vested rights. The revisions to landfill operations will not occur until the full nature and extent of the changes have been environmentally assessed, the County and the regulatory agencies have been fully apprised to those changes, and the County and the regulatory agencies have determined that is appropriate to proceed. The Board's action to approve the Second Amendment was found to be exempt from CEQA, and a Notice of Exemption was filed with the County Clerk on March 23, 2007.

commencing the CEQA review with a new initial study and a revised and re-circulated SEIR addressing the points and comments set forth below. A-2

Aesthetics

The SEIR Must Identify Those Areas of the Landfill Site That Have Been "Phased" For Development: The SEIR states that "the landfill facility has been phased in such a manner so as to reduce the visual prominence of the facility over time…specifically, the portions of the landfill with greatest visibility to surrounding off-site areas are targeted for earlier phases of the landfill's operation." SEIR, at 4.1-2. The SEIR does not provide sufficient detail regarding which specific areas are targeted for this phased approach nor timing regarding when these areas are anticipated to be closed and revegitated. Without this information it is impossible to analyze if this approach is appropriate as a means to reduce visual impacts of the entire Landfill site over its operating life. In addition, the habitat restoration plan contemplated under Expansion EIR Mitigation Measures A-1, A-2, and A-4, and which was evidently approved by the California Department of Fish and Game and the United States Fish & Wildlife Service, should be provided for review and analysis. A-3

The Litter Removal Plan, as Contemplated by Expansion EIR Mitigation Measure A-7, Should Be Updated and Provided for Public Review and Comment: The SEIR states that pursuant to Expansion EIR Mitigation Measure A-7, the Landfill is responsible for the control and cleanup of litter and debris from the landfill and waste-hauling vehicles that travel along Dawson Canyon Road. SEIR, at 4.1-2. This plan, which is likely over a decade old, should be updated and circulated for public review. The update and additional review is particularly necessary given that there currently exists a considerable trash dumping problem along Dawson Canyon Road—a significant impact to visual quality from the Landfill site operations that has historically not been adequately reduced to a level of less than significant. A-4

It Is Improper for the SEIR to Rely on the Expansion EIR Mitigation Measures: The SEIR provides no new mitigation measures to offset the significant impacts to aesthetic and visual qualities as discussed above. Instead, the SEIR simply references the aesthetic mitigation measures from the Expansion EIR. The SEIR contains limited or no discussion and analysis regarding the historic success of these mitigation measures. This is especially problematic since many of the mitigation measures, including Mitigation Measure A-7 discussed above, have not been implemented such that impacts from current Landfill operations have been reduced to a level of less than significant. The SEIR must first provide an analysis of the success, or lack of success, of the Expansion EIR Mitigation Measures on reducing aesthetic and visual impacts from the Landfill to a level of less than significant and, depending on this analysis, prepare new and/or additional mitigation measures as necessary and appropriate. A-5

A-3 The El Sobrante Landfill is already a fully-permitted, 24-hour landfilling operation. Currently, only the landfill gate hours are limited to 20 hours for the receipt of waste. All other operations, including spreading, compacting, and covering the waste, occur on a 24-hour basis. These operations will not change as a result of the proposed project. The lateral and vertical expansion of the El Sobrante Landfill, which was analyzed in the Expansion EIR certified by the Board of Supervisors in 1998, required that development of the landfill disposal footprint area, which is comprised of approximately 495 acres, be phased in terms of disturbance, closure, and revegetation to minimize visual impacts to surrounding views from developing the entire 495-acre landfill disposal footprint in toto. The order of the phasing has been implemented to target those phases with greater visibility before other phases, but is not a requirement of the Expansion EIR, and serves to satisfy Expansion EIR Mitigation Measure A-6 to provide, where feasible, visual screening of operations at the working face and to reduce, where feasible, potential glare impacts on surrounding residences from nighttime activities at the working face. Revegetation is performed in accordance with a comprehensive Multiple Species Habitat Conservation Plan (MSHCP) covering the entire 1,322 landfill property, along with contingency acreage, that goes well beyond anything envisioned by the mitigation measures to revegetate with native materials. This MSHCP is being implemented pursuant to an Implementing Agreement between USA Waste, the County of Riverside, the USFWS, and CDFG with conservation easements in favor of CDFG on all lands outside the active landfill areas. The effectiveness of these mitigation measures is reviewed on an annual basis by the County's Administrative Review Committee, the Citizen Oversight Committee, and the MSHCP Management Committee, with an annual report filed with the Board of Supervisors. Accordingly, the SEIR properly excludes a discussion of visual quality effects associated with existing landfill operations since landfill operations would not change with approval of the SWFP revision.

A-4 As in Response A-3, there would be no changes to landfill operations as part of the proposed project that should result in an increased incidence of litter or illegal dumping on surrounding roadways or highways. Litter and/or illegal dumping along Dawson Canyon Road are nuisance impacts that may or may not be directly attributed to landfill operations. The litter along the I-15 segment comes from a variety of sources, including, but not limited to the large commercial retail and residential growth located along the highway and the interstate and intrastate transportation of goods. In addition, the commenter is incorrect in stating

A-4 *(cont)* that the litter removal measures are "…likely over a decade old…" The mitigation measures pertaining to litter removal were last amended on July 1, 2003 when the Board of Supervisors approved the First Amendment to the Second El Sobrante Landfill Agreement with the following two (2) provisions:

- Item 23.a. of the Conditions of Approval, Exhibit "F" [Mitigation Measure A-7], is revised as follows: USA Waste or its successor-in-interest shall be responsible for the control and cleanup of litter and debris from the landfill and/or waste-hauling vehicles along the landfill access road to its intersection with Temescal Canyon Road, and along Temescal Canyon Road from the intersection with Interstate 15 (I-15) to the intersection with Weirick Road.
- In order to provide more focused assistance with the problem of illegal dumping on private property, USA WASTE or its successor-in-interest will provide one roll-off bin per quarter in the Spanish Hills area and one roll-off bin per quarter in the Dawson Canyon area for private property owners in those areas. Costs associated with transportation and disposal of waste deposited in the bins will be borne by USA WASTE, with the understanding that the private property owners will bear the responsibility of depositing waste in the bins.

In compliance with these provisions, USA Waste, as operator of the landfill, maintains a litter removal crew and allots a minimum of sixteen man-hours per week to the clean-up of litter and debris along the landfill access road to its intersection with Temescal Canyon Road and along Temescal Canyon Road from the intersection with I-15 to the intersection with Weirick Road. Facility managers monitor the entire area on a daily basis and dispatch crews to keep the area clear of litter and abandoned junk. The operator also provides one roll-off bin in the Spanish Hills area and one roll-off bin in the Dawson Canyon area for private property owners in those areas. Although the requirement clearly states that the bins are to be provided on a quarterly basis, USA Waste typically transports and disposes of the two roll-off bins on an "as needed" basis on an average of once every 45 days or upon request of the residents in these areas. These services are all part of on-going efforts to keep the surrounding neighborhoods and areas immediately adjacent to the landfill site litter-free and would not change under the proposed project.

In addition to required measures, USA Waste has sponsored Caltrans Adopt-A-Highway program for the past eleven years. They are respon-

A-4 *(cont)* sible for six miles of the I-15 freeway, starting on the southbound side at Ontario Avenue and ending right before the Temescal Canyon Road exit and starting on the northbound side at Temescal Canyon road and ending right before Cajalco Avenue. In June 2007, USA Waste created a supplemental clean up crew of eight workers and started to pick up litter on their adopted miles twice a month. The crew comprises six or more workers than what the Adopt-A-Highway contractor previously used for litter removal activities along this highway segment and utilizes performance standards that are far greater relative to standards utilized by typical Adopt-A-Highway contractors. In January 2008, USA Waste increased the frequency of highway litter removal activities from a bi-weekly to a weekly basis. Since the commencement of the litter removal efforts, USA Waste has collected over 3500 bags of litter from this portion of the I-15 freeway.

In Spring 2007, El Sobrante sponsored a community clean up event along Temescal Wash to address illegal dumping that occurs along the Temescal Wash, and another one is planned in March 2009.

Lastly, a portion of funds ($150,000) that USA Waste was required to pay the County under the Second Agreement was placed in a trust fund for use by the County for local mitigation projects in areas surrounding the landfill, as recommended by the Citizens Oversight Committee (COC). Currently, the COC has focused funding and efforts on illegal dumping in the Temescal Valley.

The effectiveness of these measures is reviewed on an annual basis by the Administrative Review Committee and the COC, with an annual report filed with the Board of Supervisors. Since no changes are proposed to the litter removal programs, and since the total weekly volume of waste accepted at the landfill will not change, implementation of the proposed project would not result in any new significant aesthetic impacts associated with litter in the local area. Mitigation measures already in place at the landfill are sufficient to ensure that any potential impacts to aesthetics from litter are less than significant.

A-5 Refer to Responses A-3 and A-4. No changes that could affect aesthetic conditions are proposed as part of the SWFP revisions, except for the addition of waste delivery trucks to surrounding roadways during the extended hours of waste acceptance. Impacts associated with vehicle headlights during the extended hours of operation are evaluated in Chapter 4.1, and the analysis concludes that no new significant impacts

Air Quality

The SEIR Fails to Account for Vehicle Emissions: The air quality analysis presented in the SEIR appears to disregard the emissions from vehicles delivering refuse to the Landfill. The emissions related to the Landfill workers' vehicles are accounted for in both the existing condition and proposed Project conditions (SEIR, at 4.2-5 and 4.2-9); however, the emissions from the vehicles delivering refuse to the Landfill is not included in the accounting. The apparent reason for this omission is found in the Air Quality Report (Appendix B of the SEIR) which justifies not including emissions estimates from refuse delivery vehicles due to the fact that the proposed Project would not change the maximum number of allowable daily trips to the Landfill. SEIR, Appx. B, at 12. A-6

Project implementation will likely lead to an increase in the overall quantity (by weight) of refuse delivered to the Landfill. Under the proposed Project, although daily trips to the Landfill will remain capped at 1,305 trips per day, the total amount of refuse delivered to the Landfill could be as high as 70,000 tons per day. Given that the proposed Project will allow for weekly accounting of the allowable weight of refuse deliveries instead of a daily accounting, the expectation presented in the SEIR that certain days will see additional tons per day of deliveries over and above the existing 10,000 tons per day cap. Under "worst case" conditions, it would be possible that the entire 70,000 tons per week cap could be reached in a day or over only a few days, rather than over a 7-day period (as per the current accounting methods). A-7

With an allowance for additional tons (up to 60,000 additional tons over existing conditions) per day of Landfill deliveries, it would be expected that the type of trucks making deliveries to the Landfill could change. Namely, more of the large, heavy-duty trucks that are capable of hauling more waste materials could make Landfill deliveries still keeping the Landfill within its daily trip cap and the weekly tonnage cap. The emissions from heavy-duty trucks differ from that of smaller trucks and vehicles due to engine size, fuel type, etc. If there were additional heavy-duty trucks (as opposed to smaller vehicles) it would be expected that the emissions from this change in delivery vehicle type would lead to a change in the emissions attributable to the Project.

Nowhere in the SEIR or the Air Quality Report supporting the SEIR, is the likely change in the type of delivery vehicle considered. The failure to consider the likely change in the distribution of delivery vehicles, along with the potential change in vehicle miles traveled, represents a significant lack of analysis presented in the SEIR. The conclusions of less than significant impacts reached in the SEIR with regard to air quality are questionable at best, are not properly supported, and likely are incorrect, given the lack of consideration of changed delivery vehicle type. A-8

The SEIR Undercounts On-site Emissions: The SEIR appears to have undercounted potential emissions impacts from on-site sources for reasons similar to those discussed, above, related to delivery vehicle emissions. The Air Quality Report supporting the SEIR states in one instance that there may be "slightly additional equipment" [sic] required on site due to Project A-9

A-5 *(cont)* would result. Litter on surrounding roadways would not increase with approval of the SWFP revision; therefore, the SEIR properly relies on the mitigation from the Expansion EIR and the Second Agreement and its Amendments thereto in concluding that no new mitigation is required.

A-6 Total daily trips to the landfill are currently limited to 1,305 and would remain unchanged under the revised SWFP. As such, emissions associated with vehicles delivering refuse to the landfill would not increase on a weekly or annual basis. The daily ADT restriction included in the existing and proposed SWFP applies to employee vehicle trips; therefore, Table 4.2-6 slightly overestimates the increase in emissions that would result from the proposed SWFP revision. No further response is necessary.

A-7 As noted throughout the SEIR, total ADT at the landfill may not exceed 1,305 trips, including vehicle trips associated with employees. As shown in SEIR Table 3-1, approximately 65 employee trips per day would occur under the proposed revision to the SWFP, leaving a balance of 1,240 ADT that may be used for waste deliveries. In the unlikely circumstance that all 1,240 trips are associated with transfer trailer deliveries, the maximum tonnage that could be delivered on an individual day would be 26,040 tons (1,240 transfer trailer trips x 21 tons/transfer trailer trip = 26,040 tons). Based on observed data from the landfill (SEIR Table 2-3), it is reasonable to conclude that transfer trailers would only account for approximately 53% of the total daily trips at the landfill, with the remaining vehicle trips comprising personal vehicles, commercial trucks, and transfer rigs. For this reason, the SEIR evaluates a total "worst-case" value of 16,053 tons per day (SEIR Table 4.5-3).

A-8 Please refer to Response A-7.

In addition, it should be noted that in the event that larger vehicles are used for the delivery of waste to the landfill, such as transfer trailers, total weekly ADT at the landfill would necessarily decrease as the weekly tonnage limit would be achieved with the use of fewer vehicles. The resulting reduction in vehicle trips would thereby reduce potential impacts to air quality relative to what is evaluated in the SEIR.

For example, if all waste deliveries were to occur via transfer trailers, with a capacity of 21 tons per truck, the total amount of weekly vehicle

implementation and that "types and quantities of equipment used for daily operations at the Project site would generally be consistent with the types and quantities of equipment that are use for ongoing landfill operations" under existing conditions. SEIR, Appx. B, at 11. Based on these assumptions, the SEIR then concludes that equipment emissions will not be substantially different under the Project conditions as under existing conditions. *See* SEIR, Table 4.2-6, at 4.2-9.

This assumption fails to account for the potential under the proposed Project for substantially greater amounts of waste tonnage to be delivered to the Landfill in comparison to existing conditions. Up to 60,000 tons more per day could be delivered to the Landfill under the Project than currently is allowed. There would have to be additional equipment on-site and operating to manage the greater deliveries of refuse. Not only is the need for this additional equipment not discussed in the SEIR, but also the emissions from this equipment are not accounted for in the analysis. Without such analysis, the SEIR's conclusions related to air quality emissions are lacking support and are potentially erroneous. A-9

The SEIR's Analysis of Potential Climate Change Impacts Is Inadequate: As a result of the State legislature's adoption of the Global Warming Solutions Act ("AB 32") in 2006 and Senate Bill 97 in 2007, the adoption of the AB 32 Scoping Plan by the California Air Resources Board ("CARB") in 2008, and the actions of the California Attorney General's office in numerous CEQA matters, addressing a proposed project's contribution to existing climate change problems has become a top priority in the State. In order to address this global problem, most CEQA documents these days include a quantitative analysis of a proposed project's increased contribution of greenhouse gas emissions to the atmosphere, a minimal significance threshold anywhere from zero net emissions to some relatively minor increase, a conclusion that a project's contribution is cumulatively considerable and, thus, significant, and the imposition of all feasible mitigation measures to reduce the project's emissions to a level below significance. Unfortunately, the SEIR does none of these things. Perhaps the best way to explain the SEIR's deficiencies is a comparison of an appropriate CEQA analysis vs. what was done in the SEIR. A-10

Quantification of Greenhouse Gas Emissions: In order to appropriately assess the significance of a proposed project's greenhouse gas emissions, the CEQA document should include an inventory of all of the project's emission sources including both direct and indirect sources. *See* CEQA Guidelines §§ 15151, 15126, and 15358(a)(2). In performing this inventory, the analysis should include: (1) electricity and natural gas usage in buildings, (2) vehicle trips generated by the project, (3) water supply and transportation to the project, (4) operation of construction vehicles and machinery, (5) manufacture and transport of building materials, (6) waste disposal, including transport of solid waste and methane emissions from decomposition, (7) the burning of fossil fuels extracted, and all other relevant sources. A-11

The only assessment of greenhouse gas emissions contained in the SEIR is identified in Table 4.2-7 and only includes on-site activities. It fails to include all direct and indirect sources and therefore needs to be reanalyzed. In addition, the analysis only shows a comparison to the proposed A-12

A-8 *(cont)* trips associated with the landfill would be 3,333 (70,000 tons per week ÷ 21 tons per vehicle trip = 3,333 vehicle trips per week).

By contrast, using the vehicle mix and tonnage values presented in SEIR Table 4.5-3, the weekly maximum tonnage would be achieved in approximately 4.4 days (after which, the landfill no longer would be allowed to accept waste). Such assumptions would result in a maximum of 5,742 vehicle trips during the week (4.4 days x 1,305 vehicle trips/day = 5,742 vehicle trips). Of this total, approximately 2,988 trips would consist of transfer trailers based on the vehicle mix presented in SEIR Table 4.5-3.

Therefore, the values studied in the SEIR assume only 345 fewer transfer trailers trips (3,333 – 2,988 = 345) per week than would occur if all deliveries were made using larger transfer trailers. In addition to the transfer trailer trips, the SEIR also accounts for the use of 1,162 personal vehicles, 1,580 commercial trucks, and 13 transfer rigs on a weekly basis (based on the assumed 4.4 days of waste acceptance per week described above). Emissions associated with 345 transfer trailers per week would be less than the weekly emissions associated with 1,162 personal vehicles, 1,580 commercial trucks, and 13 transfer rigs.

Therefore, the SEIR evaluates an appropriate vehicle mix that is based on projections from actual observed data from 2007 and properly accounts for the "worst-case" conditions that could result from the proposed SWFP revisions.

A-9 SEIR Table 3-2 depicts a comparison of existing and proposed daily peak landfill equipment usage. As shown, there would be slight changes to the amount of equipment operating on-site. The emission calculations presented in the project's air quality study and in SEIR Table 4.2-6 are based on the equipment assumptions presented in SEIR Table 3-2. As presented in Table 3-2, certain equipment types are anticipated to be used more frequently, while others would be used less frequently due to operational efficiencies that would result from the proposed SWFP revision. In the unlikely event that the theoretical maximum daily tonnage of 26,040 tons is achieved on a single day (refer to Response A-7), there may be increased use of equipment on-site during that day. However, because the landfill is restricted to a total weekly tonnage limit of 70,000 tons, a concomitant reduction in on-site equipment would occur during other days of the week. As a result, while there may be an increase in the amount of ground disturbance on a given day, the average

A-9 *(cont)* daily emissions from on-site equipment would not increase beyond the values presented in SEIR Table 4.2-6 due to a reduction in the amount of equipment needed during other days of the week.

A-10 The CEQA statutes do not require any Lead Agency to establish significance thresholds under CEQA for any pollutant. Even the Preliminary Draft CEQA Guidelines that were recently promulgated for comment do not attempt to identify a GHG emissions significance threshold, but instead suggest many factors for consideration that would constitute the substantial evidence on which the determination of significance of GHG impacts would be based. In the absence of guidance from the State of California and the AQMD, the SEIR utilizes a qualitative approach to evaluating project impacts to Global Climate Change (GCC). Such an approach is supported by the California Air Pollution Control Officers Association (CAPCOA) in its publication, CEQA & Climate Change (January 2008). Based on guidance from the CAPCOA, the significance of the proposed project's impacts to GCC was evaluated on a project-specific basis. A comparison of the existing and proposed GHG emissions is documented in SEIR Table 4.2-7. A lengthy discussion is provided within Chapter 4.2.3.3 to demonstrate why implementation of the proposed Project would not result in cumulatively significant impacts to GCC. This determination is based, in part, on mitigation requirements already in effect at the landfill (refer to SEIR Table S-1) and regulatory requirements set forth by the CIWMB. For example, Mitigation Measure AQ-12 from the Expansion EIR (which also is listed in SEIR Table S-1) requires that the landfill explore the technological and economical feasibility of using natural gas fuel or other alternative fuel in transfer trucks. Until very recently manufacturers have not produced an alternative fueled tractor with sufficient horsepower to reliably pull transfer trailers. This has recently changed. Manufacturers are now preparing to release class 8 tractors powered by LNG which will be capable of pulling transfer trailers. USA Waste will be evaluating the economic feasibility of converting to these transfer trailers and will be submitting a plan to Riverside County to begin phasing in these tractors. Conversion of transfer trailers to LNG would result in a net reduction in GHG emissions associated with landfill operations.

A-11 As noted in SEIR Chapter 3.0, the project consists of a proposed revision to the SWFP to extend the period during which waste may be collected at the landfill by four hours and to change the maximum tonnage limit from 10,000 tons per day to 70,000 tons per week. The proposed project would not result in any substantial changes to on-site operations

24-hour operations relative to the current 20-hour operations. Since the Expansion EIR did not have any analysis of the Project's contribution to climate change, the changed circumstances and new information dictate a more complete analysis of the entire Project's operations to appropriately determine whether the ongoing operations as well as the proposed changes constitute significant impacts that need to be mitigated.

A-12 *(cont)*

Climate Change Cumulative Impact Analysis: After quantifying a project's greenhouse gas emissions, the agency must then determine whether the impacts from those emissions are significant. *See* Cal. Pub. Res. Code § 21082.2. This significance determination relates not only to a project's direct impacts, but also to its cumulative impacts. If a project's impacts are found to be cumulatively considerable, the lead agency must make a finding of significance. *See* Pub. Res. Code § 21083(b). As noted in numerous recent Attorney General comment letters on CEQA documents, "cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. *See* CEQA Guidelines § 15130(a). Climate change is the classic example of a cumulative effects problem; emissions from numerous sources combine to create the biggest environmental problem of our time. These sources may appear insignificant when considered individually, but when considered collectively, they are significant. As noted by the Attorney General's office, courts have rejected the argument that a project has no cumulatively considerable impacts simply because it is contributing only a relatively small or de minimus percentage to a larger environmental problem. *See Kings County Farm Bureau v. City of Hanford*, 221 Cal. App. 3d 692 (1990) and *Communities for a Better Environment v. California Resources Agency*, 103 Cal. App. 4th 98 (2002). As noted by the Attorney General's office, global warming is a quintessentially cumulative impact caused by the added effects of countless individual projects of the local, regional, state, national and international level. The relevant question is whether any additional contribution to the problem should be considered significant in light of these serious consequences.

A-13

In contrast to the appropriate way of addressing this issue in a CEQA document as outlined by the Attorney General, the SEIR does not even mention greenhouse gas emissions in the context of its very brief cumulative impact analysis. It only discusses local air quality constituents such as sulfur dioxide, carbon monoxide, and other such criteria pollutants. *See* SEIR § 4.2.4.

Climate Change Significance Threshold: Under CEQA, a lead agency is responsible for determining whether or not a potential impact should be considered significant. The primary means of making this determination is the adoption of significance thresholds to guide the agency's decision-making. There is currently no standard significance threshold for greenhouse gas emissions. However, many recent CEQA documents have included variations including: (1) net zero; (2) a 20–30 percent reduction over business-as-usual; (3) a qualitative standard requiring consistency with AB 32.

A-14

A-11 *(cont)* unclear what the commenter is referring to in describing the need to evaluate the "manufacture and transport of building materials," as the proposed project would not involve the construction of any new buildings or facilities. As noted in the footnote to Table 4.2-7, methane emissions associated with decomposition were not calculated, because LFG collection systems already are in place and are estimated to have a 99-percent destruction efficiency. Moreover, there would be no increase to methane emissions associated with the proposed project, because total weekly tonnage would not increase. GHG emissions associated with increased on-site equipment usage, including emissions associated with the burning of fossil fuels, are presented in SEIR Table 4.2-7.

A-12 An evaluation of GHG emissions associated with existing landfill operations is not required under CEQA. As determined in Fairview Neighbors v County of Ventura (1990; 70 CA4th 238, 82 CR2d 436), the court upheld that the maximum level of operations authorized by an existing permit should be treated as the baseline for purposes of an EIR evaluating expansion of the previously permitted project. Therefore, the SEIR for the SWFP revision project properly identifies the existing permitted operations of the El Sobrante Landfill as the environmental baseline. SEIR Table 4.2-7 discloses the change in GHG emissions that would result from minor increases to on-site equipment usage.

A-13 GCC is not discussed separately in SEIR Section 4.2.4, because SEIR Section 4.2.3.3 already includes a comprehensive discussion of potential GCC effects and concludes that "the RCWMD has determined that the Project will not have a significant cumulative impact" on GCC. Including a summary within Section 4.2 of the information presented on the previous page would have been repetitive. Moreover, as noted in the SEIR discussion, GCC is a global phenomenon and the cumulative study area is therefore different than the study area used in SEIR Section 4.2.4. The SEIR discussion within Section 4.2.3.3 describes the County's reasoning for determining that cumulatively considerable GCC effects would not occur. Refer also to responses A-10 through A-12.

Refer to Responses A-10 through A-13. The analysis within SEIR Section 4.2.3.3 properly concludes that implementation of the proposed project would not have a cumulatively considerable impact to GCC. The incremental increase in GHG emissions from landfill operations were determined not to be cumulatively significant because of existing mitigation requirements (refer to SEIR Table S-1) and on-going regula-

The SEIR not only fails to adopt any of these thresholds, but also the only one that the SEIR does adopt is so vague as to be irrelevant. In section 4.2.2 of the SEIR, significance threshold 3 states as follows: "Alteration to air movement, moisture, or temperature, or result in any change in climate." The issue is not whether an individual project's contribution to greenhouse gas emissions will result in any change in climate. The question is whether a project's contribution of greenhouse gas emissions to an already globally significant problem should be considered cumulatively considerable. These are two very different questions and, thus, the significance threshold used in the SEIR lacks any foundational support. Any significance thresholds adopted by a lead agency must be supported by substantial evidence in the record. CEQA Guidelines § 15064.7(b). There is nothing in the record that would support the climate change threshold of significance used in the SEIR.

A-14 *(cont)*

Climate Change Mitigation: One of the primary purposes of a CEQA document is to assess a project's significant impacts so that all appropriate feasible mitigation can be included as a condition of project approval. *See* Cal. Pub. Res. Code § 21002.1(a). By failing to adopt appropriate significance thresholds and appropriately analyze significance, a CEQA document fails in one of its most important functions.

The SEIR wholly fails in this regard by inappropriately quantifying the proposed Project's contribution to greenhouse gas emissions, completely failing to analyze cumulative impacts, and adopting invalid significance thresholds. The end result is a finding of insignificance with no mitigation measures to mitigate the Project's greenhouse gas emissions. Clearly, there are a number of practical and feasible mitigation measures that could reduce the Project's contribution to the problem of global warming. These measures must be identified and included in the SEIR.

A-15

Other Concerns with Air Quality Analysis: The flawed rationales (assumption of no significant change in on-site equipment and failure to account for changed truck distribution) are cited in the SEIR as justification for not preparing an analysis of fugitive dust emissions. For the same reasons as discussed above relative to truck distribution and on-site equipment, these rationales are not appropriate, do not support an omission of fugitive dust analysis, and thus, air quality conclusions presented in the SEIR are not supported.

A-16

A key element to the reduction of potentially significant impacts from PM_{10} emissions is implementation of mitigation measures that require the Project applicant to obtain emission offsets for PM_{10}. SEIR, at 4.2-10. Emissions offsets for particulate matter are extremely limited in the air basin relative to the proposed Project. Because the SEIR discloses that emissions of particulate matter will increase with Project implementation, it is likely that emissions offsets will need to be obtained. Unless it is known that sufficient emission offset credits are available for application to the proposed Project, the impacts of increased particulate emissions (both PM_{10} and $PM_{2.5}$) would be unmitigated. An analysis of the reasonable availability of particulate emission offsets should be included in a revised SEIR.

A-17

A-14 *(cont)* tory compliance requirements from the CIWMB and SCAQMD for landfill operations.

A-15 Refer to Responses A-10 through A-14. Mitigation measures already in effect at the landfill are documented in SEIR Table S-1 and would continue to be enforced with approval of the proposed Project. Mitigation measures for air quality that would continue to be enforced and which would have the effect of reducing the landfill's contribution to GHGs include Mitigation Measures AQ-1, AQ-5, AQ-7, AQ-8, AQ-9, AQ-11, AQ-12, and AQ-14. In addition, landfill operations are subject to regulatory compliance requirements from the CIWMB, SCAQMD, and other agencies, as described in SEIR Section 4.2.3.3, which also would assist in reducing the project's cumulative contribution to GHG emissions.

A-16 Refer to Responses A-8 and A-9. The proposed project would result only in a slight increase to on-site vehicular operations due to the increased hours of waste acceptance (refer to SEIR Table 3-2) and the addition of eight new employees (SEIR Table 3-1). The total amount of waste acceptance at the landfill would not change on a weekly basis. Therefore, the amount of on-site grading which could produce fugitive dust would not increase on a weekly basis and the SEIR properly concludes that implementation of the proposed project would not result in an increase in fugitive dust emissions.

A-17 As documented in SEIR Table 4.2-6, with implementation of the proposed project, the total increase in PM10 emissions is estimated at 2.50 pounds per day, which is below the SQAMD Regional and Localized Thresholds of 150 pounds per day and 8 pounds per day, respectively. Therefore, implementation of the proposed project would not require emission offsets for PM10. It should be noted, though, that the mitigation measure on Page 4.2-10, as referenced by the commenter, refers to Expansion EIR Mitigation Measure AQ-5, which relates to the offsetting of stationary source emissions (i.e., LFG flare) by Emission Reduction Credits (ERCs) banked in the Priority Reserve (SCAQMD Rule 1309) for essential public services; these ERCs are not purchased. Since the project does not include installing, constructing, replacing, or relocating stationary equipment with emissions, this Rule does not apply.

Noise

The SEIR Fails to Disclose Significant Noise Impacts: Noise measurements presented in the SEIR reveal that noise levels, especially nighttime noise levels, at the sensitive receptor sites nearby the Landfill are already in excess of levels considered acceptable by the County's Noise Ordinance. The County's Noise Ordinance (Mun. Code §9.52.040) establishes a 55 daytime and 45 nighttime decibel maximum for outdoor noise levels at residences, such as those located south and east of the Landfill. Noise measurements disclosed in the SEIR reveal that noise levels, especially those at night, far exceed what is considered acceptable at these residences; noise levels reached up to 58.1 decibels with the lowest measurement being 50.0 decibels. Any additional noise from Landfill operations or the delivery vehicles traveling to and from the Landfill reaching these sensitive receptors represents a significant impact in that the noise would be aggravating an already impaired situation. A-18

The SEIR claims that noise from operations within the Landfill's gates would result in both an exterior noise level of 52.4 decibels and 48.6 decibels. SEIR, at 4.3-5. Firstly, both of these results cannot be true and there is obviously a flaw in the analysis presented in the SEIR. Secondly, the SEIR's noise analysis appears biased in favor of lower noise levels, as the lowest possible nighttime noise level measured at the nearby residences (50.0 decibels) was utilized in the analysis instead of the higher nighttime noise level of 58.1 decibels. Thirdly, as discussed above, relative to air quality, it is highly likely that operations (and equipment use) at the Landfill site will be higher than what was predicted in the SEIR due to a need for additional equipment to process what would likely be substantially higher tonnage on a daily basis than is currently processed. Thus, it is likely that the actual noise levels at the nearby sensitive receptors will be higher than the 2.4-decibel increase discussed in the SEIR. Also, as discussed above related to air quality, it is likely that more heavy trucks will utilize the Landfill under the proposed Project conditions, and such an increase in heavy truck usage would present higher and more frequent noise levels than disclosed in the SEIR (29.6 decibels). These higher and more frequent nighttime noise levels would likely be considered significant. Furthermore, given the already impaired noise levels in this area, any addition of nighttime noise will be noticeable and should be considered significant. The SEIR fails to disclose these significant impacts and fails to provide any mitigation for the impacts. A-19 A-20 A-21 A-22

Additionally, the SEIR mistakenly claims that the noise standards applicable to the nearby sensitive receptors are 65 decibels for exterior uses and 45 decibels for interior uses. SEIR, at 4.3-5. Per the County's Noise Ordinance, acceptable outdoor noise levels at residences are 55 decibels during the day and 45 decibels at night. Furthermore, the SEIR only compares daytime noise levels at the sensitive receptors (38.1 and 45 decibels) to the noise generated by vehicles traveling to and from the Landfill. The analysis should have included assessments of nighttime noise levels in addition to the daytime levels. Without such analysis, the SEIR's conclusions of less than significant noise impacts are unsupported, and the SEIR fails to disclose what are likely significant nighttime noise impacts from vehicle use. A-23 A-24

A-18 The noise level measurements as shown in the Technical Appendices made available for public review, which were referenced in SEIR Table 4.3-2 and depicted on SEIR Figure 4.3-1, incorrectly reversed the labels for Locations A and B. Noise measurements depicted for Location "B" are reflective of the observed noise conditions at the nearest sensitive receptors. An addendum to the noise impact analysis has been prepared by Urban Crossroads (dated February 10, 2009) to correct this error, and this addendum has been included as part of the Final SEIR for the project.

Existing night time ambient noise levels at the nearby sensitive receptors ranges from 47.9 to 50.5 dBA Leq, as documented in the El Sobrante Landfill Noise Analysis Addendum (dated February 10, 2009). However, the commenter is incorrect in noting that "any additional noise…reaching these sensitive receptors represents a significant impact." Under CEQA, in order for an impact to be considered "significant," there must be a discernable impact to the environment resulting from direct, indirect, or cumulative effects. The Draft SEIR reported that project implementation would result in a 2.4 Leq dBA increase, without taking into consideration intervening topography. The SEIR correctly notes that such a noise level increase would not be significant, because any increase below 3.0 decibels is "barely perceptible" to the receiver. As documented in SEIR Section 4.3.4, there are no known approved or pending projects, which could contribute to increased noise levels at the nearest receptor during the extended hours of waste acceptance. As such, there are no conditions surrounding the project site, which could result in a cumulative noise increase in excess of the 3.0 dBA Leq threshold.

However, due to the error in the original noise impact analysis, a subsequent analysis was conducted to evaluate potential noise increases and taking into consideration the intervening topography so as to more accurately represent projected noise level increases during the extended hours of waste acceptance. As documented in the noise analysis addendum, the nearest sensitive receivers are located approximately 3,600 feet to the south of landfill operations, and these uses are separated from the landfill by rolling hills extending approximately 500 feet above the floor of Dawson Canyon. The revised calculations have determined that, with considerations for topography, the "project only" noise level would be approximately 40.0 dBA Leq. When combined with the existing ambient noise level of 47.9 dBA Leq, total noise levels would be 48.6 dBA Leq at the nearest noise sensitive use, representing

A-18 *(cont)* an increase of only 0.7 dBA. An increase of 0.7 dBA Leq is less than the 3.0 dBA that is considered to be "barely perceptible." Therefore, implementation of the proposed project would not result in a perceptible increase in noise levels at the nearest sensitive uses, and no cumulative developments in the area would contribute to any further increases to projected noise levels. As such, although the project would result in a slight increase in noise levels, such increases would not be perceptible to the sensitive receptors and a significant impact would not occur.

Therefore, although revisions to the noise analysis were necessary, the revisions do not change the conclusions of SEIR Section 4.3 that implementation of the proposed project would not result in a "substantial" increase in noise levels, nor would the project "result in the exposure of sensitive receptors to severe noise levels." Please refer to the Errata Sheet, included in the Final EIR, for a summary of changes that have been made to the text of the SEIR since the document was released for public review.

A-19 SEIR Table 4.3-3 shows the "Project Only Noise Total" and the "Combined Project & Ambient Noise Levels" as being 48.6 Leq dBA and 52.4 Leq dBA, respectively. The "Project Only Noise Total" describes the anticipated noise contributions if the proposed SWFP permit revision were to be implemented in the absence of any ambient noise sources. The "Combined Project & Ambient Noise Levels" describes the total combined noise levels that would result from the SWFP permit revision project and existing ambient sources of noise.

However, as noted above in Response A-18, revised calculations were performed due to an error in the original noise impact analysis. The revised analysis has determined that the existing ambient noise levels at the nearest sensitive receptor is 47.9 dBA Leq, the project only noise level would be 40.0 dBA Leq, and the combined noise level would be 48.6 dBA Leq.

A-20 Please refer to response A-18, which describes minor corrections that have been made to the noise impact analysis.

The commenter correctly notes that the analysis in the SEIR relies on the lowest recorded ambient noise level of 50.0 Leq dBA. This value was selected for analysis because it represents a "worst case" analysis of the project's potential impact on noise levels at the nearest sensitive receptor. If the ambient noise level of 58.1 Leq dBA were evaluated

A-20 *(cont)* in lieu of 50.0 Leq dBA, the resulting "Combined Project & Ambient Noise Level" would be 58.6 Leq dBA and the total "Project Contribution" would amount to an increase of only 0.5 Leq dBA. Therefore, SEIR Table 4.3-3 properly discloses the "worst case" analysis of potential noise increases affecting nearby sensitive receptors (i.e., 2.4 Leq dBA).

However, as discussed in Response A-18, an addendum to the original noise impact analysis was prepared due to minor errors that have since been corrected. As with the data presented in SEIR, project impacts were assessed in the noise analysis addendum based on the lowest reported ambient noise level of 47.9 dBA Leq. The lowest recorded ambient noise levels were used in the revised analysis, because they represent conditions under which the project would have the greatest potential for producing noise level increases of greater than 3.0 dBA Leq.

A-21 SEIR Table 3-2 depicts the anticipated changes to on-site equipment operation as a result of the revised SWFP. The values presented in Table 3-2 account for the need for increased night-time operations as necessary to process anticipated increases in waste volumes, which are conservatively estimated at 16,054 tons per day.

Noise levels from heavy mobile equipment range from 70 dBA to 95 dBA at 50 feet [refer to SEIR Technical Appendix "C" (Noise Impact Analysis), Exhibit 6-A]. The noise study prepared for the proposed Project utilizes an assumption that on-site equipment operating during the extended hours of waste delivery would produce noise levels of up to 95 dBA at 50 feet, which represents a "worst case" analysis of potential noise sources due to on-site operations. As reported in SEIR Section 4.3, the use of such equipment would result in a project-only noise level of 48.6 dBA Leq when topography is not considered. When intervening topography is included in the analysis, the project-only noise level is projected to be 40.0 dBA Leq at the nearest sensitive receptor. When combined with the corrected existing ambient noise level of 47.9 dBA Leq (refer to response A-18), the total combined noise level would be 48.6 dBA Leq, resulting in a total increase of 0.7 dBA Leq. An increase of less than 3.0 dBA Leq is not considered to be a perceptible change in noise levels. Therefore, with the minor revisions to SEIR Section 4.3 to account for the error in the original noise impact analysis, the SEIR correctly concludes that on-site operations following approval of the revised SWFP would not result in an increase in ambient noise

A-21 *(cont)* levels beyond 3.0 Leq dBA. Please refer to the Errata Sheet, included in the Final EIR, for a summary of changes that have been made to the text of the SEIR since the document was released for public review.

A-22 For the purposes of the noise study, the heavy transfer truck traffic noise impacts were treated as single-event noise levels. Due to the nature of the possible impact, a truck pass-by is generally perceived as a non-continuous linear noise source by the receiver. By completing the calculations in this manner, a more conservative approach is used rather than taking an hourly approach, which would factor in time within the hour that does not include heavy truck noise. This worse-case scenario describes the impact as a truck is passing by (loudest to the receiver) and comparing that to the ambient noise when no truck noise impact is present. As stated in SEIR Section 4.3, truck traffic along access roads during the extended hours of waste delivery are anticipated to produce noise levels of only 29.6 dBA Leq at the nearest sensitive receptor. As noted above, the corrected existing ambient noise level at the nearest sensitive receptor is 47.9 dBA Leq (refer to response A-18). When the difference between two noise sources is greater than 10.0 dBA Leq, the lesser of the two noise sources would not produce a perceptible change in noise levels. When noise levels of 29.6 dBA Leq and 47.9 dBA Leq are combined, the combined noise level is only 47.96 dBA Leq, representing an increase of only 0.06 dBA Leq. As noted in Response A-21, an increase in noise levels of less than 3.0 dBA Leq is not considered to be perceptible to the receiver. In addition, there are no cumulative projects in the study area, which have the potential to produce cumulative noise increases of 3.0 dBA Leq or greater. As such, the SEIR correctly reports that noise impacts associated with increased traffic volumes during the extended waste delivery hours would not produce a significant noise impact to nearby sensitive receptors. Please refer also to Response A-18 for a discussion of why projected noise increases would not be considered significant despite the existing ambient noise level of 47.9 dBA Leq.

A-23 As stated in Section 1 of the County's Noise Ordinance, the Noise Ordinance "…is not intended to establish thresholds of significance for purposes of any analysis required by the California Environmental Quality Act and no such thresholds are hereby established." In addition, Section 2.a. of the County's Noise Ordinance explicitly exempts "facilities owned or operated by or for a government agency" from the provisions of the ordinance. Pursuant to the Second El Sobrante Landfill Agreement, the El Sobrante Landfill is a facility that is owned and

A-23 *(cont)* operated by USA Waste as a public-private partnership with the County of Riverside, and the landfill is a public project providing an essential public service. It is therefore exempt from the standards established in the Noise Ordinance and the 55 decibel daytime standard set forth by the County's Noise Ordinance is not applicable to the proposed Project. As noted in SEIR Section 4.3.1.2, stationary noise standards are based on the County's General Plan standards for facility-related noise, which discourage noise levels in excess of 65 dBA (10-minute) Leq between 7:00AM and 10:00PM and 45 dBA (10-minute) Leq between 10:00PM and 7:00AM(refer to General Plan Policy N 4.1).

A-24 In order for vehicular trips from the landfill to create significant noise impacts to nearest sensitive receptor, the project noise levels must result in an increase of at least 3.0 dBA and the combined noise level must exceed the County's standard of 45 dBA. Any combined noise level which is less than 45dBA would be in compliance with the Noise Element standards; any noise increase of less than 3.0 dBA would not result in any significant impacts, because the receiver cannot perceive a difference in noise levels. As documented in SEIR Section 4.3, the nearest sensitive receiver is located approximately 3,600 feet south of the landfill site. At a distance of 3,600 feet from the site, vehicular noise would reach noise levels of up to 29.6 dBA. When two noise sources are greater than 10 dBA apart, the change in the combined noise level also is considered to be barely perceptible. For example, if the existing ambient noise level at the nearest sensitive receptor is assumed to be 45 dBA, the addition of a noise source measuring 29.6 dBA would produce a combined noise level of only 45.1 dBA, or an increase of only 0.1 dBA. An increase of 0.1 dBA is far below the 3.0 dBA threshold that is normally considered to be "barely perceptible." Even if existing noise levels at the existing sensitive receptors are assumed to be 45 dBA or greater, noise increases associated with project traffic would not be perceptible to the nearest sensitive receiver. Therefore, the SEIR correctly concludes that noise increases due to off-site vehicle operations would not result in a significant impact to nearby sensitive receptors.

Noise Measurements Appear Flawed: Noise measurements presented in the SEIR do not make logical sense and must be flawed. It should first be pointed out that short-term noise measurements were only taken once and only during morning hours at nearby sensitive receptors and were not collected during nighttime hours, when noise sensitivity tends to be higher. SEIR, Appx. C (Noise Report), at 18 (showing short-term noise measurements collected at 10:44 and 11:03 a.m. on February 6, 2008 for residences south and east of the Landfill). The noise levels at the nearby residences appear to be lower during the day than during nighttime hours as represented by the short-term noise measurements (38.1 and 45 decibels) and the long-term daytime measurements (42.3–56.1 decibels) compared with long-term nighttime levels (50.0–58.1). It would appear illogical that nighttime noise at rural residences would be at higher levels than daytime noise. Furthermore, noise levels reported in the SEIR at a location proximate to a roadway and cement piping factory were lower than at the rural residences (47.1–51.1 daytime near the factory vs. 42.3–56.1 near the residences and 47.9–50.5 nighttime near the factory vs. 50.0–58.1 near the residences). Such irregularities cast significant doubt on the validity of the noise measurements disclosed in the SEIR. Without accurate noise measurements, the entirety of the noise analysis presented in the SEIR is flawed and cannot support any claims of less than significant noise impacts resulting from Project implementation.

A-25

A-26

Traffic

The SEIR Fails to Rationalize Traffic Hourly Distribution Assumptions: The SEIR presumes that with expansion of delivery hours by 4 hours between midnight and 4 a.m., vehicles delivering waste to the Landfill would shift their hours to off-peak times. SEIR, at 4.5-7. There is no proper justification provided in the SEIR for this presumption. The SEIR utilizes past operational history at the Landfill, wherein deliveries to the landfill were limited to specific hours, which cannot justify a future condition wherein trips under Project conditions would be unlimited in terms of time of day. Moreover, given the significant impacts discussed in other sections, above, resulting from the additional hours of delivery (e.g., noise) the SEIR should include a discussion of the need at the Landfill to shift to a 24-hour-per-day waste acceptance schedule. Without a proper justification for the assumption that vehicles to and from the Landfill would shift their travel to off-peak times, the entire analysis of traffic impacts is fundamentally flawed and the conclusions of less than significant impacts reached in the SEIR are unsupported. We suggest additional mitigation measures be included in the SEIR to prohibit Landfill-related trips during peak periods, i.e., 6–9 a.m. and 4–7 p.m.

A-27

A-28

The SEIR's Traffic Analysis Fails to Account for Likely Changed Delivery Vehicle Types: As discussed above, under the air quality discussion, implementation of the Project is likely to lead to a change in the type of delivery vehicle to the Landfill. With increased tonnage allowed on a daily basis to the Landfill, it is likely that more heavy-duty trucks as opposed to more passenger-type vehicles would be delivering refuse to the facility. This shift in the type of vehicle would impact the traffic analysis presented on pages 4.5-9 through 4.5-11 of the SEIR. The SEIR should

A-29

A-25 Specific noise level impacts to the residences associated with equipment used in the landfill operation, such as a bulldozer or dump truck, cannot accurately be determined, due to the large distance, intervening terrain, and other ambient noise. Consequently, long-term ambient noise measurements were used to more accurately characterize the existing noise environment in the area. The long-term, 24-hour noise measurements were used to identify noise conditions for all hours in a given typical day at the nearest noise sensitive receptors. When predicting future impacts with the 24-hour operation of the facility, noise impacts associated with the landfill can be combined with the hourly nighttime noise levels taken from the long-term measurements to predict impacts perceived at the nearest noise sensitive residential uses. In addition, it was determined that project-related traffic would not have the potential to impact nearby sensitive receptors (as explained above in Response A-24).

As noted in Response A-18, an addendum to the noise impact analysis has been prepared due to an error in the original study which incorrectly reversed the recorded existing ambient noise levels for Locations A and B, as presented in Tables 5-2 and 5-3 of the noise impact analysis. As shown in Table 5-2 for Location B, which reports the noise levels at the nearest sensitive receptor, nighttime noise levels range from 47.9 to 50.5 dBA Leq. As shown in Table 5-3, however, the peak nighttime noise level occurred during the 6:00AM hour, which represents the beginning of the morning rush hour when traffic volumes on surrounding roadways are highest. As shown in Table 5-3, the peak recorded ambient noise level at the nearest sensitive receptor was 51.1 dBA Leq recorded during the 7:00AM hour, which immediately follows the 6:00AM when the peak nighttime noise levels were recorded.

A-26 Refer to Response A-18. As noted, the noise level measurements as shown in the Technical Appendices made available for public review, which were referenced in SEIR Table 4.3-2 and depicted on SEIR Figure 4.3-1, incorrectly reversed the labels for Locations A and B. Noise measurements depicted for Location "B" are reflective of the observed noise conditions at the nearest sensitive receptors. An addendum to the noise impact analysis has been prepared by Urban Crossroads (dated February 10, 2009) to correct this error, and this addendum has been included as part of the Final SEIR for the project.

As noted in the revised analysis, which correctly uses the existing ambient noise level of 47.9 dBA Leq at the nearest sensitive receptor, and taking into account the intervening topography, the project noise level at

A-26 *(cont)* the nearest sensitive receptor is projected to be 40.0 dBA Leq, resulting in a combined noise level of 48.6 dBA Leq. This reflects an increase of only 0.7 dBA Leq, which is far below the 3.0 dBA Leq that is considered the threshold of perceptibility. Therefore, the SEIR correctly concludes that project implementation would not result in any significant impacts to nearby sensitive receptors.

A-27 Please refer to Response A-7. As noted, the Second Amendment stipulates that no less than 2,400 tpd of waste must be reserved for delivery to the landfill between the hours of 9 PM and 5 AM. In addition, please refer to Tables 1 and 2 of the project's traffic study (SEIR Appendix D), which depict the existing hourly ADT volumes and the proposed hourly ADT volumes that would occur under the revised SWFP. As shown in Table 1, under existing conditions the landfill receives a disproportionate number of trips during the first hour of operation, which occurs, because it is more efficient for the transfer station operators to make deliveries during off-peak hours when traffic conditions are more favorable. However, on return trips these same vehicles are departing during unfavorable traffic conditions, which reduce the total number of deliveries that the transfer station operators can make in a given day. The trip distribution data provided in Table 2 of the traffic study projects that approximately 130 of the 679 daily transfer trailer trips would occur during the extended hours of waste acceptance, in addition to approximately three employee trips. These projections are reflective of the Second Amendment requirement to reserve 2,400 tpd of waste for nighttime deliveries and also assume that the transfer station operators would have an inherent incentive to make transfer trailer deliveries during the new extended hours of waste acceptance so as to minimize inefficiencies that result from peak hour traffic conditions. The projections also assume that any reduction in hourly ADT would most likely occur in the early morning hours as deliveries are scheduled to occur earlier in the morning, while projected volumes during the evening peak hour are not anticipated to change substantially relative to existing conditions.

A-28 Please refer to Response A-27, above. A brief discussion of the need for the proposed project is provided in SEIR Section 3.2., where it is stated that the project is needed to improve operational efficiencies and to provide greater flexibility in landfill operations. As noted above in Response A-27, the Second Amendment requires a minimum of 2,400 tpd be reserved for nighttime deliveries. In addition, the transfer station operators have an inherent incentive to shift a portion of their waste deliveries to the new hours of waste acceptance because it would result

reassess potential traffic impacts utilizing differing types of vehicle distributions than currently presented.

A-29 *(cont)*

Traffic Mitigation Measure T-5 Has Not Been Implemented: Traffic mitigation measure T-5 requires that vehicles delivering refuse to the Landfill be prohibited from using that portion of Temescal Canyon Road save that portion of the road between its intersection with I-15 and the landfill access road. The exception to this general prohibition is for vehicles collecting waste in the "immediate vicinity" of the Landfill. First of all, the phrase "immediate vicinity" does not appear to be defined either in the SEIR or the Expansion EIR, creating a large potential loophole in the mitigation measure wherein vehicles from a large, undefined area would be allowed to use the entirety of Temescal Canyon Road, including those portions outside of the I-15 intersection to Landfill access road portion; this overuse of Temescal Canyon Road would create significant traffic-related impacts for all users of Temescal Canyon Road and the homes and businesses served by that road. Second of all, we understand that, currently, many vehicles delivering refuse to the Landfill that do not appear to be delivering refuse from the "immediate vicinity" have been using Temescal Canyon Road outside of the I-15 intersection to Landfill access road portion. Because mitigation measure T-5 has not been properly implemented and cannot be properly implemented without further clarification, mitigation measure T-5 cannot be relied upon to mitigate any potential traffic impacts of the Project. Although the SEIR claims that Project impacts related to traffic will be less than significant, based on the comments presented above, we assert that Project impacts are likely to be significant and that mitigation measure T-5 cannot support any conclusion of less than significant impacts.

A-30

Cumulative Impacts/Segmenting

All Cumulative Impacts Analyses Presented in the SEIR are Faulty Due to an Inadequate Cumulative Projects List: The SEIR ostensibly bases its analyses of cumulative Project impacts on a list of past, present, and reasonably probable future projects per CEQA Guidelines section 15130(b)(1)(A). SEIR, at 2-16–17. The cumulative projects list (Table 2-7 in the SEIR) contains a glaring omission that invalidates all of the cumulative impacts analyses presented in the SEIR. Waste Management, Inc., the parent company of the Project applicant, USA Waste, has filed an application for a General Plan Amendment with Riverside County (the "GPA") that would modify the zoning of properties directly adjacent to the Landfill, changing their designations to allow for heavy industrial uses on the properties. (Application filed on February 14, 2008.) One could only logically expect that the purpose of the change in designation of properties abutting the Landfill would be to expand Landfill operations to these areas. However, even if the proposed GPA did not directly affect operations at the Landfill, the project proposed by that GPA is a "probable future project" under CEQA and should have been included in the consideration of cumulative impacts in the SEIR. As all the cumulative impacts analyses in the SEIR are fundamentally flawed, none of the less than significant impact conclusions reached in the SEIR are justified.

A-31

A-28 *(cont)* in more efficient operations and would enable the operators to achieve more deliveries in a given day than occurs under existing conditions. Therefore, because the Second Amendment already includes a requirement for nighttime deliveries, and because it is reasonable to conclude that transfer station operators would seek to improve operational efficiency by taking advantage of the new extended hours of waste acceptance, no additional mitigation measures would be necessary.

A-29 The proposed SWFP revision would not create any new incentives for use of larger delivery vehicles than occurs under existing conditions. Based on data from the El Sobrante Landfill for daily deliveries in 2007, the landfill achieved its maximum daily tonnage limit on only a single day following severe wildfire events that resulted in an unusually high amount of tonnage delivered to the facility. If the increased volume of waste on this day warranted the use of larger delivery vehicles, such an incentive would have been reflected in the observed mix of vehicle types for that day. SEIR Table 2-3 shows the maximum observed daily vehicle trips and tonnage estimates for the peak day in 2007. As shown, transfer trailers accounted for 442 of the 837 trips recorded on that day, or roughly 52.8% of the total. As shown in SEIR Table 4.5-3, transfer trailers under the revised SWFP are anticipated to account for 679 of the total 1,305 allowable trips, or 52.0% of total projected daily traffic. The slight reduction in transfer trailers as a percentage of total traffic is due to the addition of eight employee trips, which must be included within the total 1,305 daily trips allowed at the landfill. Therefore, no shift in vehicle type is anticipated with the revised SWFP, and no revisions to the project's traffic study are warranted.

In addition, please also refer to Response A-8. As discussed, the use of larger delivery vehicles would result in the need for fewer vehicular trips to achieve the daily and weekly maximum tonnage values specified by the Second Amendment. As discussed in Response A-8, if a shift to larger vehicles was to occur there would be an increase of 345 transfer trailer trips per week, but there also would be a reduction of 1,162 personal vehicles, 1,580 commercial trucks, and 13 transfer rigs. Traffic impacts associated with 1,162 personal vehicles, 1,580 commercial trucks, and 13 transfer rigs would be greater than the impact of 345 transfer trailer trips. Therefore, the SEIR properly evaluates the "worst-case" conditions that could result from implementation of the revised SWFP.

A-30 All transportation-related Mitigation Measures have been fully implemented, and all impacts associated with the currently permitted level of traffic, which does not change with the proposed Project, have been fully mitigated. Mitigation Measure T-5 (formerly Expansion EIR Mitigation Measure T-7) was intended to only minimize truck trips on this portion of Temescal Canyon Road. It also only applies to collection vehicles in control of USA Waste and not any other haulers in Riverside County using this landfill. The only way to halt truck traffic on this portion of road would be to close it to all truck traffic, but because it is a public road that also provides secondary, emergency access to the landfill, and because of the many industrial and commercial land uses along Temescal Canyon Road, this cannot be implemented. With that said, however, USA Waste has posted a sign located at the intersection of Dawson Canyon Road and Temescal Canyon Road restricting all waste haulers from turning right onto that portion of Temescal Canyon Road when they leave the landfill. When a driver is observed not using the designated route, the management of the trucking company is notified of the violation, and a request is made to correct the behavior. The El Sobrante staff tracks violations, and repeated violations by a drive will result in the driver being banned from using the El Sobrante facility. The effectiveness of this mitigation measure is reviewed on an annual basis by the Administrative Review Committee and the COC, with an annual report filed with the Board of Supervisors.

A-31 The proposed General Plan Amendment (GPA), referenced by the commenter, is a completely separate action by Waste Management, Inc. (WMI) and not-related to the landfill or the proposed project. If it was intended for expansion of the landfill, as the commenter conjectures, a GPA would not be needed at this juncture, because as a “public facility” the General Plan would be amended through a County-initiated action, but only after all the necessary disclosures, analyses, and approvals were obtained, not the least of which would be further amendment of the Second Agreement and further environmental review pursuant to CEQA. With that said, the proposed GPA was submitted without any accompanying applications that would grant WMI land use entitlement or change the zone on the adjacent property. Consequently, there is no “probable future project” under CEQA.

The County is Likely Improperly Segmenting the Project: If indeed the purpose of the proposed GPA by Waste Management, Inc. is to expand or directly affect Landfill operations, as it would be expected such an application would be, then the County would be inappropriately segmenting projects through the SEIR currently under consideration. CEQA requires that an EIR analyze the "whole of an action." CEQA Guidelines §15378(a). If the County intends on processing the GPA through a separate CEQA document and if that GPA relates to Landfill operations, then the project assessed in that separate CEQA document and the proposed Project SEIR at issue now would be improperly piecemealed or segmented. Segmenting the Project in this way would directly contradict the purpose of CEQA's requirement to assess the whole of a project, which is to ensure "that environmental considerations not become submerged by chopping a large project into many little ones, each with a potential impact on the environment, which cumulatively may have disastrous consequences." *Burbank-Glendale-Pasadena Airport Auth. v. Hensler*, 233 Cal. App. 3d 577, 592 (1991). The County must reconsider the appropriateness of the SEIR given the proposed GPA. If the proposed Project and the GPA are related, then a separate CEQA document assessing the potential impacts of both must be prepared.

A-32

Conclusion

In conclusion, the SEIR flaws outlined above render that document inadequate under CEQA. The SEIR must be rejected, and a new SEIR must be produced which substantially revises the current text to provide additional information supporting its conclusions, to discuss additional significant Project-related impacts, and to provide adequate mitigation and amelioration measures for such significant Project impacts where appropriate and legally required. The revised CEQA document must then be circulated for an additional public review period, pursuant to the provisions of CEQA. Additionally, the County's commitment to the Second Amendment to the Landfill Agreement (made on March 13, 2007) must be set aside until after completion of the Project's CEQA processing.

Thank you for this opportunity to comment on the SEIR. If you have any questions regarding any of the above comments, please do not hesitate to call me.

A-33

Kind regards,

Shanda M. Beltran

Shanda M. Beltran

SMB:pmt

A-32 Refer to Response A-31.

A-33 Comment acknowledged. However, for the reasons provided in Responses A-2 through A-32, the SEIR for the El Sobrante SWFP Revision project adequately discloses the potential for environmental impacts that could result from project implementation and makes reasonable assumptions about future site operations. Based on the analysis in the SEIR, it was determined that no new significant impacts to the environment would result from project approval. Mitigation requirements already in effect in association with the Expansion EIR would continue to be enforced with approval of the proposed project. Continued enforcement of these mitigation requirements would further ensure that landfill operations do not result in significant environmental impacts. Therefore, the County has properly adhered to the substantive and procedural requirements of CEQA, and further review of the proposed project under CEQA is not warranted.

LINDA S. ADAMS
SECRETARY FOR ENVIRONMENTAL PROTECTION

CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

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February 4, 2009

Mr. Ryan Ross
Riverside County Waste Management Department
14310 Frederick Street
Moreno Valley, CA 92553

Subject: **SCH No. 2007081054** – Draft Supplemental Environmental Impact Report for the revision of El Sobrante Landfill's Solid Waste Facilities Permit (SWFP) No. 33-AA-0217, Riverside County

Dear Mr. Ross:

Thank you for allowing the California Integrated Waste Management Board's (Board) 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.

Board staff has reviewed the environmental document cited above and offers the following project description, analysis and our recommendations for the proposed project based on our understanding of the project. If the Board's project description varies substantially from the project as understood by the Lead Agency, Board staff requests incorporation of any significant differences in the Final Supplemental Environmental Impact Report.

B-1

Project Description

The Riverside County Waste Management Department, acting as Lead Agency, has prepared and circulated a Draft Supplemental Environmental Impact Report proposing to extend the hours for receipt of waste to 24 hours per day and change the limits on tonnage from a maximum of 10,000 tons per day, 70,000 tons per week to a weekly maximum of 70,000 tons.

SCANNED #74879
By:
Date: 2/9/09

INTEGRATED WASTE MANAGEMENT BOARD

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B-1 Comment is acknowledged. The project description included in this comment is accurate and is consistent with the description contained within the SEIR. As such, no changes to the Final SEIR were necessary as a result of this comment.

Entitlements for El Sobrante Landfill
Current and Proposed

	Current Entitlements 2007 SWFP	Proposed Entitlement
Hours of Operation Receipt of Waste	4 am to 12 am Monday thru Sunday	24 hours per day 7 days per week
Hours of Operation All Other	24 hours per day 7 days per week	No Change
Maximum/Peak Permitted Tonnage	10,000 tons per day	70,000 tons per week
Unprocessed and Processed Green Material	2284 tons per day or 14,788 tons per week	No Change
Maximum/Peak Permitted Traffic	1305 vehicles per day	No Change
Total Permitted Area	1322 acres	No Change
Disposal Footprint	481 acres	No Change
Peak Elevation	1832 feet above mean sea level	No Change

No new environmental impacts were identified as a result of this change in permit conditions and previously identified environmental impacts did not increase to a level of significance.

B-1 *(cont)*

BOARD STAFF'S COMMENTS

For clarity and convenience, questions and comments that Board staff is seeking a specific response to will be *italicized* so the reader can more easily locate and respond to them.

Peak Tonnage Increase

While there theoretically is no limit to the peak tonnage entering a landfill, other than the operator's ability to handle the waste in a timely manner and to meet State Minimum Standards. *The environmental document did not present any discussion regarding peak handling capacity. Board staff is uncomfortable in considering a change in limitations of this magnitude without detailed discussion or analysis regarding the landfills ability to handle this increase.*

B-2

Potentially, with the limitations proposed the operator could take, while unlikely, 70,000 tons one day a week, only being limited by the maximum vehicle limits. Board staff is uncertain why the operator wishes to remove the peak daily tonnage cap of 10,000 tons per day; but can only assume they are or expect to bump against the 10,000 tons per day ceiling. *If that is the case present analysis or discussion regarding what peak tonnage could be handled and still meet State Minimum Standards.*

B-3

B-2 Please refer to Response A-7. In addition, SEIR Tables 3-1 and 3-2 describe the changes in daily personnel and landfill equipment that would be necessary to process waste at the facility during the extended waste delivery hours. The shift to 24-hour waste acceptance will allow for the addition of a full 3rd shift, complete with the personnel and equipment necessary to handle any potential increase in daily tonnage as analyzed in the SEIR. Therefore, the SEIR adequately discusses and analyzes the ability of the landfill to handle increased tonnage resulting from 24-hour waste acceptance at 70,000 tons per week.

B-3 Please refer to Response A-7 for discussion on peak tonnage. While it is anticipated that the landfill may receive tonnage above the current daily limit of 10,000 tons, continued adherence to the operating procedures outlined in the JTD and the addition of a full 3rd shift to assist in the processing of waste at the facility during the extended waste delivery hours will ensure that the landfill remains in full compliance with Title 27, and thereby continues to meet State Minimum Standards.

Board staff suggests a new peak daily tonnage that will allow for growth and still be able to meet State Minimum Standards. An example could be 15,000 tons per day with a maximum of 70,000 tons per week which would allow a higher peak daily tonnage but limit the landfill to 70,000 tons per week.

B-4

Twenty-Four Hour Operation

Board staff suggests that the similar conditions that currently exist on the 2007 Solid Waste Facilities Permit continue.

- **24 Hour Continuous Operations**: When the landfill is conducting 24-hour operations at the working face of the landfill, daily cover will be placed on any disposed waste that will not receive new waste within a 12-hour period.
- **All other operations:** When the landfill is operating less than 24 hours per day, daily cover will be placed on the disposed waste at the end of each working day. When earthen daily cover is applied, the working face is sloped and covered with soil to reduce the amount of infiltration into the waste from precipitation and the associated surface water runoff. The daily cover will be compacted to six inches by heavy equipment.

Board staff recommends that earthen daily cover be applied to the working face not less than every 7 calendar days for the same reasons as above under "All Other Operations."

B-5

CONCLUSION

The Board staff thanks the Lead Agency for the opportunity to review and comment on this Draft Supplemental 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.

The Board staff requests copies of any subsequent environmental documents including, the Final Supplemental Environmental Impact Report, the Report of Facility Information/Joint Technical Document, any Statements of Overriding Consideration, copies of public notices, and any Notices of Determination for this project.

Please refer to 14 CCR, § 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]."

The Board 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 Supplemental Environmental Impact Report. Refer to Public Resource Code, Section 21092.5(a).

B-6

B-4 Board staff's suggestion of imposing a daily tonnage limit while maintaining a weekly limit of 70,000 tons is acknowledged. However, the purpose in going to 24-hour, continuous waste delivery is to provide greater flexibility in addressing fluctuations in tonnage and to increase operational efficiencies in anticipation of meeting future waste disposal needs of both western Riverside County and other non-County users, by adding a full, third shift of employees, by providing a more even distribution of traffic, and by keeping the landfill gate open. A weekly limit provides these efficiencies and is consistent with the Waste Board's decision to define the "operating day" in terms of the application of daily cover at the landfill as the end of the work week.

As noted in Response A-7, 16,054 tons per day is estimated to be the worse case daily tonnage, as based on the maximum permitted vehicles of 1,305 and assumed vehicle types. If the vehicle types were to shift towards larger transfer trucks (currently estimated at 53% of trips), then there is the potential for an increase in daily tonnage above the 16,054 tons. However, the SEIR has adequately described the environmental impacts associated with the proposed project.

B-5 No changes to the existing SWFP conditions referenced by this comment are proposed as part of the project. Therefore, these requirements will still remain in effect with approval of the proposed project.

B-6 The comments and requests of Board staff are acknowledged.

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

B-6 *(cont)*

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

Sincerely,

Raymond M. Seamans
Waste Compliance and Mitigation Program
Permitting and LEA Support Division
South Branch Permitting
California Integrated Waste Management Board

Cc: Lillian Conroe, Supervisor
Waste Compliance and Mitigation Program
Permitting and LEA Support Division
South Branch Permitting, Region 4
California Integrated Waste Management Board

Susan Markie, Branch Manager
Waste Compliance and Mitigation Program
Permitting and LEA Support Division
South Branch Permitting
California Integrated Waste Management

Sam Martinez, Supervisor
County of Riverside
Community Health Agency
Department of Environmental Health
P. O. Box 1280
Riverside, CA 92502

PUBLIC COMMENT CARD
El Sobrante Landfill Solid Waste Facility Permit Revision Supplemental EIR

We would appreciate your comments on the Project. If there are any questions or concerns you have, please feel free to list those as well. If you wish to comment on the Project, please fill out this card completely and leave it with Riverside County Waste Management Staff, or mail to: RCWMD, 14310 Frederick Street, Moreno Valley, CA 92553. Comments will be accepted until February 4, 2009.

Name: Melany Denkers Address: 9303 Stone Canyon Road

Comment: I consider myself a community member of Temescal Valley - and I do not forsee any critical impacts on my residence, whether it be property value or personal enjoyment · due to the El Sob. Landfill Solid Waste Facility Permit Revision.
Thank you for the presentation + information to clarify the project. Keep up the good work.

Signature 1-27-09 Date

C-1

PUBLIC COMMENT CARD
El Sobrante Landfill Solid Waste Facility Permit Revision Supplemental EIR

We would appreciate your comments on the Project. If there are any questions or concerns you have, please feel free to list those as well. If you wish to comment on the Project, please fill out this card completely and leave it with Riverside County Waste Management Staff, or mail to: RCWMD, 14310 Frederick Street, Moreno Valley, CA 92553. Comments will be accepted until February 4, 2009.

Name: Richard Walchle Address: 15863 Consul Ave Corona

Comment:
Good Presentation — No objections

Signature Date

D-1

Responses

C-1 The comment that the commenter does not foresee any critical impacts on their property value or personal enjoyment as a result of the proposed project is acknowledged; no further response is necessary.

D-1 The comment that the commenter has no objections to the proposed project is acknowledged; no further response is necessary.

PUBLIC COMMENT CARD
El Sobrante Landfill Solid Waste Facility Permit Revision Supplemental EIR

We would appreciate your comments on the Project. If there are any questions or concerns you have, please feel free to list those as well. If you wish to comment on the Project, please fill out this card completely and leave it with Riverside County Waste Management Staff, or mail to: RCWMD, 14310 Frederick Street, Moreno Valley, CA 92553. Comments will be accepted until February 4, 2009.

Name: JANA WALCHLE Address: 18863 Consul Ave. Corona CA 92881

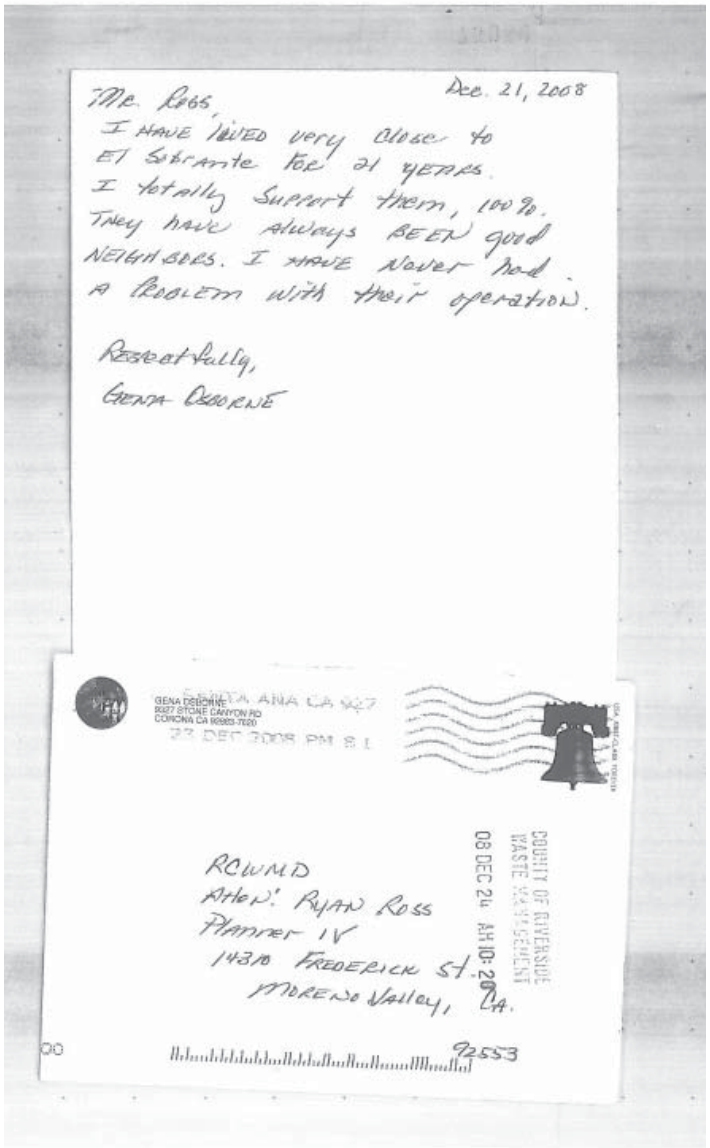
Comment:

Jeremy Harding and Ryan Doss did a very fine presentation at the El Cerrito Community meeting! We have no problems w/ the changes.

E-1

Jana Walchle 1-27-09
Signature Date

E-1 The comment acknowledges that the commenter has no concerns over the proposed project; no further response is necessary.



Dec. 21, 2008

Mr. Ross,
I have lived very close to El Sobrante for 21 years. I totally support them, 100%. They have always been good neighbors. I have never had a problem with their operation.

Respectfully,
Gena Osborne

SANTA ANA CA 927
GENA OSBORNE
8927 STONE CANYON RD
CORONA CA 92883-7620
22 DEC 2008 PM 5 L

COUNTY OF RIVERSIDE
WASTE MANAGEMENT
08 DEC 24 AM 10:20

RCWMD
Attn: Ryan Ross
Planner IV
14310 Frederick St.
Moreno Valley, CA.
92553

F-1

F-1 The comment that the commenter has no concerns over the proposed project is acknowledged. No further response is necessary.

WARREN D. WILLIAMS
General Manager-Chief Engineer

1995 MARKET STREET
RIVERSIDE, CA 92501
951.955.1200
FAX 951.788.9965
www.rcflood.org

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

January 12, 2009

09 JAN 14 PM 12:19
COUNTY OF RIVERSIDE
WASTE MANAGEMENT

Mr. Ryan Ross, Planner IV
Riverside County Waste Management Department
14310 Frederick Street
Moreno Valley, CA 92553

Dear Mr. Ross:

Re: Draft Supplemental Environmental Impact Report for the El Sobrante Solid Waste Facility Permit Revision

This letter is written in response to the Draft Supplemental Environmental Impact Report (SEIR) for the El Sobrante Solid Waste Facility Permit Revision. The proposed project revises the El Sobrante Landfill Solid Waste Facility Permit to allow for the following operation changes: 1) extend the hours at the gate for waste delivery by four (4) hours; and 2) change the maximum disposal tonnage limits from a daily limit of 10,000 tons per day to a weekly limit of 70,000 tons per week. The Project site is located within an unincorporated portion of western Riverside County, east of the Temescal Valley, between Olsen Canyon and Dawson Canyon. Nearby cities include the city of Corona to the northwest, and the city of Lake Elsinore to the south. G-1

The Riverside County Flood Control and Water Conservation District has no comments at this time. G-2

Thank you for the opportunity to review the SEIR. Please forward any subsequent environmental documents regarding the project to my attention at this office. Any further questions concerning this letter may be referred to Art Diaz at 951.955.4643 or me at 951.955.8581. G-3

Very truly yours,

KRIS FLANIGAN
Senior Civil Engineer

c: TLMA
Attn: David Mares

AD:mcv
P8\123200

SCANNED # 74330
By: ____
Date: 1/14/09

G-1 The Flood Control District's description of the proposed project is accurate; comment is acknowledged.

G-2 The "No comment" is acknowledged.

G-3 Comment is acknowledged; any subsequent environmental documents regarding the project will be forwarded to Mr. Art Diaz at the contact information provided.

RIVERSIDE COUNTY
FIRE DEPARTMENT
In cooperation with the
California Department of Forestry and Fire Protection

210 West San Jacinto Avenue • Perris, California 92570 • (909) 940-6900 • Fax (909) 940-6910

John R. Hawkins
Fire Chief

Proudly serving the unincorporated areas of Riverside County and the Cities of:

Banning
Beaumont
Calimesa
Canyon Lake
Coachella
Desert Hot Springs
Indian Wells
Indio
Lake Elsinore
La Quinta
Moreno Valley
Palm Desert
Perris
Rancho Mirage
San Jacinto
Temecula

Board of Supervisors

Bob Buster, District 1
John Tavaglione, District 2
Jeff Stone, District 3
Roy Wilson, District 4
Marion Ashley, District 5

COUNTY OF RIVERSIDE
WASTE MANAGEMENT
09 JAN 13 AM 10:41

January 9, 2009

Riverside County Waste Management Dept.
Mr. Ryan Ross, Planner IV
14310 Frederick St.
Moreno Valley, CA 92553

Re: **The El Sobrante Landfill SEIR, SCH # 2007-081054**

With respect to the referenced project (EIR), the Riverside County Fire Department has the following comments:

The proposed project(s) will add to the cumulative adverse affect on the Fire Department's ability to maintain the current level of service. These impacts include fire and medical emergencies as well as public service calls, all due to the increased presence of people, traffic and structures. H-1

Mitigation measures should be considered in order to help reduce these impacts to a level below significant. Examples of mitigation measures might include: H-2

- Developer participation in land acquisition and fire facility construction;
- Equipment upgrade and/or purchase;
- Participation in a fire mitigation fee program which would allow one-time capitol improvements such as land and equipment purchases, and construction development.
- Participation in the cost of adding additional personnel.
- Costs necessary to maintain the increased level of service may be at least partially offset by taxes acquired by the new construction; however additional funding sources may have to be identified to cover any shortfalls.

The 3 nearest Fire stations that would respond to any incident are: H-3

RCO Station #15, El Cerrito 20320 Temescal Canyon Rd. Corona, CA

RCO Station #64, Sycamore Creek, 25310 Campbell Ranch Rd. Corona, CA

RCO Station #82, Lake Hills, 17452 Lake Point Dr. Riverside, CA

H-1 As described in SEIR Chapter 3.0, the project consists of a proposal to revise the SWFP to: a) extend the number of hours waste can be accepted by four (4) hours to include the hours of 12:00 Midnight to 4:00 AM, thereby allowing acceptance of waste over a continuous 24-hour period; and b) change the maximum tonnage limit of 10,000 tpd, 7 days a week, to a weekly tonnage limit of 70,000 tpw, with no net increase in the amount of waste allowed on a weekly basis. In addition, the project would maintain the daily maximum vehicle trips count of 1,305 as specified under the existing SWFP. Based on the SWFP restriction on daily vehicle trips to the landfill, there would be no increase in the amount of traffic visiting the landfill. As shown in SEIR Table 3-1, implementation of the proposed project would result in an increase of eight (8) employees at the landfill. No new structures are proposed as part of the project. The proposed project is not growth-inducing. Both fire suppression equipment and heavy equipment are maintained onsite, which includes water trucks, and landfill personnel are trained in fire safety and emergency evacuation situations. As such, the proposed project will not "add to the cumulative adverse affect on the Fire Department's Ability to maintain the current level of service," because there would be no increase in traffic or structures at the landfill, and the project would only result in the addition of eight new employees at the landfill. Impacts to fire protection services were previously evaluated as part of the Expansion EIR, which determined that impacts to fire protection services would be reduced to a level below significance with the incorporation of mitigation measures. These mitigation measures, which are summarized in SEIR Table S-1, would continue to be enforced with approval of the proposed project.

H-2 Please refer to Response H-1. As noted, based on the changes proposed as part of the SWFP revisions project, no impacts to fire protection services are anticipated. The Riverside County Waste Management Department reviewed the proposed project as part of an Initial Study, and determined that the previous Expansion EIR adequately disclosed and mitigated for impacts to fire protection services. Therefore, because implementation of the proposed project would not result in any new significant impacts to fire protection services, additional mitigation requirements beyond those that were previously identified as part of the Expansion EIR are not warranted.

H-3 The Fire Department's description of existing fire protection facilities available to serve the landfill site is acknowledged. No response is necessary.

All the above mentioned RCO Fire stations are staffed full-time, 24 hours/7 days a week, with a minimum 3 person crew operating "Type-1" structural fire fighting apparatus providing Paramedic service.

The first unit should arrive within 3-5 minutes after dispatch, the second within 5-8 minutes and the third between 8-10 minutes. These times are approximate.

H-3 *(cont)*

Current minimum staffing levels of 3 persons per responding unit presently meet existing demands. As with any additional construction within a response area, a "cumulative" increase in requests for service will add to the Fire Department's ability to provide adequate service.

H-4

Fire flow requirements within commercial projects are based on square footage and type of construction of the structures. The minimum fire flow for **any** commercial structure is 1500 gallons per minute, at a residual operating pressure of 20-psi, and can rise to **8000** gallons per minute, (per Table A-III of the California Fire Code). Any water system shall be designed in accordance with the appropriate section of Riverside County Ordinance 460 and/or 787.2, subject to the review and approval by the Riverside County Fire Department.

H-5

In addition, provide Fire Department vehicle access roads; unobstructed width of not less than twenty-four (24) feet and an unobstructed vertical clearance of not less than thirteen (13) feet six (6) inches. (CFC 902.2.2.1)

H-6

Provide the gradient for fire apparatus access; roads shall not exceed fifteen (15) percent. (CFC 902.2.2.6)

H-7

Prior to approval of any development plan for lands adjacent to open space areas, a fire protection/vegetation management (fuel modification) plan shall be submitted to the fire department for review and approval. The appropriate management entity shall be responsible for maintaining the elements of the plan. The fuel modification plan is subject to review by the Fire Marshal at the tract map phase.

H-8

In the interest of Public Safety, the project shall provide an Alternate or Secondary Access(s) as stated in the Transportation Department Conditions. Said Alternate or Secondary Access(s) shall have concurrence and approval of both the Transportation and Fire Departments, and shall be maintained through out any phasing. Primary and secondary access points were not shown on the submittal.

The Fire Department will need to review any proposed access/road circulation plan pertaining to this project.

Primary and Secondary access points were not provided on the submittal to determine if they will meet Fire's needs. Fire will need to review any proposed access/road circulation plan.

H-9

This project shall participate in any program required regarding impact fees to fund increased emergency service needs.

H-10

Please add the following comments to section 4.4.15 Fire Hazard Controls Fire Services Section.

Remove: Category III project and replace with Category II project

H-11

H-4 The Fire Department's statement that existing staffing levels are adequate to meet existing demands is acknowledged. As indicated in Response H-1, the project would not result in a cumulatively considerable increase in demands for fire department personnel. As such, implementation of the proposed project would have no effect on the current acceptable staffing levels for the area, and no new impacts to fire protection services would occur. In addition, and as documented in SEIR Section 3.0, the project does not involve the construction of any new facilities and will therefore not result in a cumulative increase in demands for fire protection services which could inhibit the Fire Department's ability to provide adequate service.

H-5 The project does not propose the construction of any new buildings or facilities. Construction of buildings and facilities on-site were previously evaluated as part of the Expansion EIR, and mitigation was imposed to ensure that such construction occurs in conformance with current County ordinances and policies. Please refer to the mitigation measures from the Final EIR for Public Services and Utilities, which are provided in SEIR Table S-1 and would continue to be enforced upon approval of the proposed project.

H-6 SEIR Figure 4.5-5 depicts the existing emergency access routes at the landfill. However, because the proposed project does not propose to alter the physical conditions at the landfill or change the existing operational characteristics at the landfill (except for the extension of the hours of waste acceptance and a change from a daily to a weekly tonnage limit, as described in Response H-1), project implementation would not result in the need for the construction of new vehicle access roads.

H-7 Please refer to Response H-1. No new construction is proposed as part of the SWFP revision project. Therefore, the proposed project would not affect the gradients on existing landfill access roads.

H-8 Please refer to Response H-1. No new construction is proposed as part of the project. Fuel management concerns were previously addressed as part of the Expansion EIR, which identified significant but mitigable impacts due to fire hazards. Mitigation Measure U-6 from the Expansion EIR (which also is included in Table S-1 of the SEIR) already specifies the requirement to prepare a fire protection/revegetation management plan for any development of lands adjacent to open space areas. As required pursuant to Mitigation Measure U-6, a fire protection/revegetation management plan, which was previously filed with

H-8 *(cont)* the Fire Department in 2003 for review and approval, has been implemented. Mitigation Measure U-6 would continue to be enforced with approval of the proposed project. Construction is underway to increase the water supply at El Sobrante by adding additional storage tanks and pumps. The Fire Department will receive a dedicated hook-up to each of the new tanks.

H-9 SEIR Figure 4.5-5, which was included in the Draft SEIR that was circulated for public review, depicts the existing emergency access routes at the landfill. No changes to the physical conditions on-site are proposed as part of the project. The existing access roads were previously reviewed and approved by the Transportation and Fire Departments prior to implementation of the Landfill Expansion project. Therefore, the proposed project would not be subject to review by either the Transportation or Fire Department, because no alteration to the existing primary and secondary access routes are proposed. Similarly, no changes to existing access/road circulation plans are proposed as part of the project, and these existing facilities would therefore not require further review by the Fire Department.

H-10 Please refer to Response H-1. No impacts to fire protection services would result from project implementation; therefore, project implementation would not warrant the imposition of additional impact fees to fund emergency services.

H-11 Comment is acknowledged. Minor revisions have been made in Section 4.4.1.5 of the Final SEIR to account for the suggested revisions provided in this comment (please refer to the Errata Sheet included in the Final SEIR for a summary of changes made to the SEIR since the draft was circulated for public review). However, as noted above, the project would not result in an increased demand for fire protection services; as such, no new impacts have been identified and no new mitigation would be warranted due to these suggested revisions.

Remove: 12 minute response and replace with 15 minute response
Remove: County Ordinance 546 and replace with County ordiance787.

The El Sobrante Landfill site is located within a high fire hazard area of the County and is classified as a Category III project, which requires a fire station within three (3) miles or a 12-minute response time. As such, buildings on-site were required to be constructed in compliance with County Ordinance No. 546, which required special construction provisions relative to fire safety.

Based on the adopted Riverside County Fire Protection Master Plan, the Category II – Urban specifies that a full alarm assignment be operating on the fire ground within 15 minutes and the fire station to be located within 3 miles. The primary station serving this area would not be within the 3 mile objective.

H-11

The following comments reflect the construction phase of the project.

Provide access to all fire hydrants along all access routes in the project area and provide and maintain fire department vehicle access roads along the project site.

Construction activities could result in traffic delays that could affect the ability of fire and emergency service units to meet response time goals within the project area.

Temporary road closures, lane closures, or detour routes may impair response times by the fire department and other emergency service providers.

Non fire related medical emergencies could temporary increase within the presence of construction workers and heavy machinery during construction of the project.

Mitigation measures should be considered in order to help reduce these impacts to a level below significance.

The California Fire Code outlines fire protection standards for the safety, health, and welfare of the public. These standards will be enforced by the Fire Chief.

If you have additional questions feel free to contact me.

H-12

Sincerely,

Jason Neuman, Captain
Strategic Planning Division
Riverside County Fire Department
(951) 840-8810

H-12 As noted in Response H-1, no new construction is proposed as part of the project. As such, the comments pertaining to the "construction phase" are not applicable to the proposed project. The comment that the California Fire Code fire protection standards would continue to be enforced by the Fire Chief is acknowledged. No further response is necessary.

El Sobrante Citizens Oversight Committee

February 4, 2009

Mr. Hans Kernkamp
County of Riverside
Waste Management Department
14310 Frederick Street
Moreno Valley, California 92553

RE: El Sobrante Landfill Solid Waste Facility Permit Revision Project

Dear Mr. Kernkamp:

The El Sobrante Citizens Oversight Committee ("COC") fully supports the El Sobrante Landfill Solid Waste Facility Permit Revision Project ("Project"). The presentation given on January 14, 2009, by the County of Riverside Waste Management Department was very informative and provided clarity to COC members on the Project's objectives and the potential benefits to the surrounding community. The technical studies performed for the Project thoroughly evaluated potential areas of concern (aesthetics, air, noise, and traffic) and we feel that the proposed Project will not negatively impact the quality of life enjoyed by residents of the Temescal Valley. In fact, the Project has potential to improve the quality of life by reducing traffic impacts during the morning rush hour.

I-1

We appreciated the professionalism and quality of the presentation and offer this letter of support in favor of the Project.

Sincerely,

Michelle Randall, Chairperson

Michelle Randall, Chairperson
El Sobrante Landfill Citizens Oversight Committee

I-1 Comments acknowledged. No response is necessary.

DEPARTMENT OF THE ARMY

February 6, 2009

REPLY TO
ATTENTION OF:
Office of the Chief
Regulatory Division

Ryan Ross
County of Riverside
Waste Management Department
14310 Frederick Street
Moreno Valley, CA 92553

Dear Mr. Ross:

It has come to our attention that you plan to improve the El Sobrante Landfill Solid Waste Facility in Corona, Riverside County, California. This activity may require a U.S. Army Corps of Engineers permit.

A Corps of Engineers permit is required for:

a) the discharge of dredged or fill material into, including any redeposit of dredged material within, "waters of the United States" and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to,

1. creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;

2. mechanized landclearing, grading which involves filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the United States;

3. allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the United States;

4. placing pilings when such placement has or would have the effect of a discharge of fill material;

b) any combination of the above.

J-1

SCANNED #74930
By: kmc
Date: 02/11/09

J-1 The provided description of the process for obtaining a U.S. Army Corps of Engineers (ACOE) permit is acknowledged. However, as documented throughout the SEIR, the proposed Project consists only of a change to the operational characteristics at the landfill and would not require or result in any physical improvements. Because no physical improvements are proposed, no impacts to waters of the United States would occur. Therefore, no permits from the ACOE will be necessary in association with the proposed Project. However, since the landfill is a fully permitted, exiting operation, there are currently mitigation measures in place (see revised B-4 through B-7 of Mitigation Monitoring Plan) to ensure that ACOE will be consulted prior to any disturbance of wetland/riparian areas and that all necessary permits will be obtained.

Enclosed you will find a permit application form and a pamphlet that describes our regulatory program. If you have any questions, please contact Veronica at 213-452-3292 or via e-mail at Veronica.C.Chan@usace.army.mil. Please refer to this letter and SPL-2009-00130-VCC in your reply.

J-1 *(cont)*

Sincerely,

Jason Lambert
Project Manager
South Coast Branch
Regulatory Division

Enclosures

Table of Contents

Appendices

(Provided under separate cover)

List of Figures

List of Tables

List of Acronyms

AAM	Annual Arithmetic Mean
AB32	Assembly Bill 32 (California Global Warming Solutions Act)
ACOE	US Army Corps of Engineers
ADT	average daily trips
AMR	Annual Monitoring Report
amsl	above mean sea level
ARB	Air Resources Board
BACT	Best Available Control Technology
BOS	Riverside County Board of Supervisors
CARB	California Air Resources Board
CCR	California Code of Regulations
CEC	California Energy Commission
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CETAP	Community and Environmental Transportation Acceptability Process
CH_4	Methane
CIWMB	California Integrated Waste Management Board
CIWMP	Riverside Countywide Integrated Waste Management Plan
CO	Carbon Monoxide
CO_2	Carbon Dioxide
COC	Citizen Oversight Committee
CSS	Cross Street Stop
dB	decibel
dBA	A-weighted decibel
EA	Environmental Assessment
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
Eq	Equivalent
ERC	Emission Reduction Credits
ERF	Energy Recovery Facility
(F)	Fahrenheit
FEIR	Final Environmental Impact Report
GCC	Global Climate Change
GHG	Greenhouse Gas
GIS	Geographic Information Systems
HDPE	High-Density Polyethylene
IA	Implementation Agreement
I-15	Interstate 15

I-215	Interstate 215
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
JTD	Joint Technical Document
LCP	Load Check Program
LCRS	Leachate Collection and Removal System
LEA	Local Enforcement Agency
Leq	equivalent sound level
LFG	Landfill Gas
LOS	Level of Service
MCP	Mid-County Parkway
MMP	Mitigation Monitoring Program
MND	Mitigated Negative Declaration
MOU	Memorandum of Understanding
MSW	municipal solid waste
MSHCP	Multiple Species Habitat Conservation Plan
ND	Negative Declaration
NMOC	non-methane organic compound
NO_x	Nitrogen oxides
NMOC	Non-Methane Organic Compounds
NOP	Notice of Preparation
O_3	Ozone
OS-CH	Open Space-Conservation Habitat
PCE	Passenger Car Equivalent
PF	Public Facility
PM_{10}	Inhalable Particulates
$PM_{2.5}$	Ultra-Fine Particulates
RCDEH	Riverside County Department of Environmental Health
RCF	Regional Composting Facility
RCIP	Riverside County Integrated Project
RCTC	Riverside County Transportation Commission
RCWMD	Riverside County Waste Management Department
ROG	Reactive Organic Gas
ROWD	Report of Waste Discharge Requirements
RWQCB	Regional Water Quality Control Board
SB 97	Senate Bill 97
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Governments
SCH	State Clearing House
SEIR	Supplemental Environmental Impact Report

SIP	State Implementation Plan
SKR	Stephen's Kangaroo Rat
SO_2	Sulfur Dioxide
SOI	Sphere of Influence
SR-91	State Route 91
SWFP	Solid Waste Facility Permit
T-BACT	Toxics-Best Available Control Technology
TACs	Toxic Air Contaminants
tpd	tons per day
tpw	tons per week
Tg	Teragrams
TS	Traffic Signal
USFWS	US Fish and Wildlife Service
VOC	Volatile Organic Compounds
WDR	Waste Discharge Requirement
WMI	Waste Management, Inc.

S.0 Summary

This document is a Supplemental Environmental Impact Report (SEIR) prepared pursuant to the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code §21000, et seq.) and the State CEQA Guidelines (California Code of Regulations §15000, et seq.) for the purpose of disclosing the potential for significant environmental impacts to occur as a result of the proposed project to revise the El Sobrante Landfill SWFP (herein, the Project), pursuant to the Second Amendment to the Second El Sobrante Landfill Agreement (herein, Second Amendment).

A previous EIR for the El Sobrante Landfill Expansion Project (herein, Expansion EIR) was certified by the Riverside County Board of Supervisors on September 1, 1998 (SCH No. 1990020076). The Riverside County Waste Management Department (RCWMD), acting on behalf of the County of Riverside (County) as the Lead Agency, has determined that only minor revisions to the previous Expansion EIR are necessary to make the previous Expansion EIR adequately apply to the proposed Project in the changed situation. Accordingly, and pursuant to CEQA Guidelines §15163, the RCWMD has determined that a Supplement to an EIR or SEIR is required.

This chapter is intended to briefly summarize the proposed Project and its potential environmental consequences in clear, simple, and practical language, in accordance with CEQA Guidelines Section 15123. The listing of environmental effects, mitigation measures, and summary of proposed alternatives provided in this chapter constitute the required identification of issues to be resolved and areas of concern, pursuant to CEQA Guidelines Section 12123(b).

S.1 Project Synopsis

S.1.1 Project Location

The Project site is located within an unincorporated portion of western Riverside County, California, east of the Temescal Valley, between Olsen Canyon and Dawson Canyon. Nearby cities include the City of Corona, which lies approximately (2) two miles northwest of the landfill, and the City of Lake Elsinore, approximately 13 miles to the south. Regional access to the site is provided via Interstate 15 (I-15) located just west of the Project site. Direct access to the site is provided by Temescal Canyon Road, and Dawson Canyon Road, a private landfill access road.

S.1.2 Project Description

The Project is a proposal to revise the El Sobrante Landfill Solid Waste Facility Permit (SWFP) pursuant to the Second Amendment to the Second Agreement, which would allow for USA Waste of California, the owner/operator and a subsidiary of Waste Management, Inc., to seek the appropriate approvals necessary to implement the following changes in the landfill's operations:

- Extend the number of hours waste can be accepted by four (4) hours to include the hours of 12:00 Midnight to 4:00 AM, thereby allowing acceptance of waste material over a continuous 24-hour period; and

- Change the maximum tonnage limit of 10,000 tons per day (tpd), seven days per week, to a weekly tonnage limit of 70,000 tons per week (tpw). No increase in the

permitted vehicle trips and the amount of waste allowed on a weekly basis is proposed.

S.1.3 Project Objectives

The El Sobrante Landfill Project objectives are as follows:

- Provide greater flexibility in landfill operations to meet the disposal needs of the regional waste system;
- Improve solid waste management services to southern California customers;
- Increase operational efficiencies in anticipation of meeting future waste disposal needs of both western Riverside County and other non-County users; and
- Reduce the amount of daily peak hour trips associated with the Project site.; and

S.1.4 Environmental Setting

A. Existing Land Uses

The El Sobrante Landfill is an existing Class III, nonhazardous municipal solid waste (MSW) facility situated on 1,322-acres, of which 481 acres are permitted for landfill operations. The landfill accepts waste from both Riverside County and out-of-County sources. The entire landfill property totals 1,322 acres. Non-waste operations, such as grading and site and vehicle maintenance, are allowed to occur 24 hours per day, seven (7) days per week, and MSW is allowed to be accepted on a daily basis between the hours of 4:00 AM and 12:00 Midnight. Operations are currently closed on certain County landfill holidays and Sundays.

B. Surrounding Land Uses

Lake Mathews, a 2,800-acre fresh water reservoir, lies approximately (2) two miles northeast of the Project site, near the City of Corona. Open space is the most common land use within 1,000 feet of the landfill site. The 162.4-acre Synagro Regional Composting Facility (RCF) occurs west and adjacent to the Project site. Light industrial/manufacturing occurs to the south and west, several mining operations (primarily clay and aggregates) occur to the southwest, pockets of residential land uses occur throughout Dawson Canyon to the southeast, and open space-conservation habitat blankets the eastern and northern boundaries of the landfill.

C. Site Topography

The topography of the El Sobrante Landfill area varies from gently to steeply sloping hills, knolls and ridges to flat mesas. Elevations on-site range from about 1,100 feet above mean sea level (amsl) near the southwest portion of the site, to about 1,400 feet amsl towards the central portions of the site. Natural slopes range from 1.5:1 (horizontal to vertical) to nearly flat, with most slopes less than 2:1. Most of the steeper slopes are predominately found in the eastern portions of the site. Topographic conditions are subject to change as waste is delivered, processed, compacted, and covered with earthen materials.

D. Vegetation/Habitats

The Project site supports various plant communities, comprising Riversidean sage scrub, annual grasslands, riparian/wetlands, cismontane juniper woodland and scrub, and alluvial fan scrub. The portions of the site supporting landfill operations and related activities are graded or disturbed areas. These areas consist primarily of flat-profile lands intermixed with moderate-depth drainages, characterized by annual grassland with some areas of Riversidian sage scrub. Drainages on the Project site generally are ephemeral and have little to no riparian vegetation. The remaining 677 acres of the site (approximately 52-percent of the total property) is designated by the El Sobrante MSHCP as undisturbed open space.

S.1.5 Environmental Analysis

A. Aesthetics

This SEIR analyzed the potential for the Project to adversely impact the visual environment. As discussed in SEIR Section 4.1, *Aesthetics*, the proposed Project would not result in any new impacts to local visual quality, scenic vistas, or scenic highways that were not previously analyzed in the Expansion EIR; therefore, a significant impact would not occur. In addition, implementation of the Project would not result in significant adverse impacts related to night lighting or glare.

B. Air Quality

This SEIR includes an analysis of potential air quality impacts related to the Project. As discussed in SEIR Section 4.2, *Air Quality*, with continued enforcement of mitigation measures identified in the Expansion EIR and MMP, the proposed Project would not exceed SCAQMD's regional or localized thresholds, and impacts would be less than significant. In addition, the Project would not contribute substantially to global climate change and would not result in significant odor emissions.

C. Noise

This SEIR includes an analysis of potential noise impacts related to the Project. As discussed in SEIR Section 4.3, *Noise*, the proposed Project would result in the addition of approximately 0.7~~2.4~~ dBA CNEL, which is considered less than a "barely perceptible" increase. As such, the Project would not result in a significant increase in noise levels and no new mitigation would be required. In addition, the nearest sensitive land uses would not be ~~in~~ exposed to significant increases in noise levels.

D. Public Health and Safety

This SEIR includes an analysis of public health and safety concerns associated with landfill operations. As described in SEIR Section 4.4, *Public Health and Safety*, the proposed Project would have an incremental and less than significant impact on existing health nuisances associated with litter and potential vectors. No additional mitigation measures beyond those identified in the MMP for the Expansion EIR are required. In addition, the Project would not result in an increased fire hazard in areas with flammable brush, grass or trees, and the Project would not result in any alterations to the existing emergency response and evacuation plan for the site.

E. Transportation and Circulation

An analysis of projected transportation and circulation impacts related to the Project is included in this SEIR. As discussed in SEIR Section 4.5, *Transportation and Circulation*, the proposed Project would not result in an increase in vehicle trips and would reduce traffic congestion at Project intersections and on freeway mainlines during peak hours. In addition, the proposed Project would not adversely impact emergency access routes, would not result in inadequate parking, and would not create hazards for local automobile, bicycle, or pedestrian traffic. No significant adverse effects were identified for the Project related to transportation and circulation.

F. Effects Found Not to be Significant as Part of the Initial Study

As described in SEIR Section 5.0, *Mandatory CEQA Topics*, an Initial Study (IS) prepared for the Project on August 8, 2007, determined that proposed Project would not have the potential to cause adverse effects associated with the following areas: Biological Resources, Cultural Resources, Geology/Soils, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Population/Housing, Public Services, Recreation, Utilities and Services. Therefore, these issues are not carried forward for detailed analysis in Section 4.0 of this SEIR. For these issue areas, there is no new information to be disclosed, and no revisions to the Expansion EIR are necessary. In addition, applicable mitigation measures previously imposed on the Project as part of the Expansion EIR would continue to be enforced. Table S-1 provides a summary of those mitigation measures from the Expansion EIR, which would continue to be enforced with implementation of the proposed Project.

S.2 Areas of Concern

A Notice of Preparation (NOP) for this EIR was distributed on August 9~~April 12~~, 2007 to Responsible Agencies and the public for a 30-day public review and comment period and is included as Appendix A to this SEIR. Both written and verbal comments received by the County of Riverside during the NOP process are addressed in this EIR.

NOP Comment Letters received raised the following concerns:

a. Potential traffic related impacts due to re-distribution of existing traffic patterns and associated with extending the hours the facility is permitted to accept material.

b. Potential violation of existing or future air quality standards associated with a 24 hour operation and use of additional on-site equipment.

c. Potential air quality impacts associated with the exposure of sensitive receptors to air pollutants associated with extended operating hours.

d. Potential air quality impacts associated with greenhouse gas (GHG) emissions at the Project level.

e. Potential air quality and safety impacts associated with the addition of heavy equipment operating during extended hours to accommodate the processing of anticipated daily tonnage.

f. Potential safety impacts to workers due to extended nighttime operations.

g. Potential noise impacts resulting from higher traffic volumes and extended operating hours of heavy equipment.

h. Potential aesthetic impacts due to an increase in glare coming both from the landfill site and from waste hauling vehicles.

These areas of concern have been evaluated in this SEIR, and none are considered to be "controversial" based on the extensive analyses provided under the appropriate issue area heading throughout this document.

S.3 Required Permits and Approvals

This SEIR serves to inform the various governing agencies with regulatory oversight of the El Sobrante Landfill operations of the environmental impacts associated with increasing the number of hours waste is accepted at the site and with changing the daily capacity limit to a weekly capacity limit. The following public entities and/or agencies may use this SEIR when considering the project:

❑ Riverside County Board of Supervisors

- Review of SEIR for adequacy and consistency with CEQA
- Approve/Disapprove the Project and Certify the SEIR
- Adopt the appropriate findings pursuant to CEQA Guidelines §15091
- Adopt the Mitigation Monitoring Program (MMP)
- File/Post the Notice of Determination

❑ Local Solid Waste Management Enforcement Agency (LEA)

- Confirm findings of conformance with the California Integrated Waste Management Plan
- Issue the revised SWFP upon concurrence from the CIWMB

❑ California Integrated Waste Management Board (CIWMB)

- Approve/Disapprove the issuance of the proposed SWFP by the LEA

S.4 Project Alternative

The CEQA Guidelines, Section 15126.6, identifies the parameters within which consideration and discussion of alternatives to the proposed project should occur. As stated in this section of the guidelines, alternatives must focus on those that are reasonably feasible and which attain most of the basic objectives of the project. Since the Project is a proposal to revise the SWFP to allow for operational changes at an existing facility, where the impacts from the fully permitted operation have been fully analyzed and mitigated for in the Expansion EIR, the only 'feasible' alternative is the "No Project Alternative."

Under the No Project Alternative, the El Sobrante Landfill site would continue to operate under its existing SWFP No. 33-AA-0217. As required by CEQA, the "No Project Alternative" will provide decision makers the opportunity to identify impacts that would occur with or without development of

the proposed Project. Additional alternatives were previously considered as part of the Expansion EIR, and as such, no additional alternatives need to be identified (nor are any feasible).

S.5 Expansion EIR Mitigation Requirements

As documented throughout this SEIR, new or expanded mitigation measures were not required in association with the proposed Project, because it was determined that the proposed Project would not result in any new impacts to the environment that were not previously accounted for, and mitigated by, the Expansion EIR.

Since certification of the Expansion EIR in 1998, several of the mitigation requirements associated with the Expansion project have since been fulfilled, while others reflect on-going or yet-to-be fulfilled requirements imposed by the Expansion EIR to reduce potential impacts to a level below significance. Table S-1, *Expansion EIR Mitigation Measures Still in Effect*, provides a summary of all of the mitigation measures that would remain in effect with approval of the proposed SWFP revision Project. It should also be noted that some of the Mitigation Measures listed in Table S-1 have been updated to reflect partial fulfillment of the requirement and/or changed circumstances; such modifications are denoted in the left-hand column of Table S-1.

Table S-1 Expansion EIR Mitigation Measures Still in Effect

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
Aesthetics				
A-1	To assure visual screening of landfill operations and facilities, a phased closure and restoration plan shall be implemented. The closure and restoration plan shall utilize Riversidian sage scrub consistent with native vegetation in nearby undisturbed areas of the Gavilan Hills to minimize visual impacts to surrounding views.	USFWS, CDFG	Multispecies Restoration Plan and Implementation Plan to be reviewed and approved by USFWS and CDFG prior to closure of the initial phase of the expanded landfill. Ongoing monitoring and reporting to be conducted in accordance with the approved Restoration Plan and Implmentation Plan through landfill operation and postclosure monitoring period.	A-1
A-2	Development shall be phased such that only approximately 20 acres are disturbed at any one time. Riversidian sage scrub restoration activities shall be similarly phased.	RCWMD, LEA	RCWMD and LEA to review phasing plans and inspect the landfill upon their discretion.	A-2
A-3	Landfill-associated facilities and structure exteriors (including rooftops) and signage shall be of a color consistent with the surrounding area.	RCBSD	RCBSD to review and approve building plans prior to issuance of building permits.	A-3
A-4	A plan that assures the removal or approved use of landfill-associated facilities, structures, and signage shall be approved by the CIWMB, as part of the Post-closure Plan.	LEA, CIWMB	Postclosure Monitoring Plan to be reviewed and approved by LEA and CIWMB prior to phased closure.	A-4
A-5	Outdoor lighting associated with the access road, administration building, and scales shall be directed toward the ground and shall be shielded. Portable lighting used for landfill operations (i.e., working face of the landfill) shall be shielded and directed toward the working area.	LEA	LEA to inspect lighting upon their discretion.	A-5
A-6	Wherever feasible, temporary earthen or landscape berms, or other structures or measures, shall be utilized to provide	LEA	LEA to inspect lighting upon their discretion.	A-6

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	visual screening of operations at the working face and to reduce potential glare impacts on surrounding residences from nighttime activities at the working face of El Sobrante. Any measures implemented for this purpose shall be subject to annual review by the Citizen Oversight Committee. (Board of Supervisors)			
A-7	A plan that assures the removal of litter associated with the proposed project shall be approved by the CIWMB prior to the issuance of a SWFP. USA Waste or its successor-in-interest shall be responsible for the control and cleanup of litter and debris from the landfill and/or waste-hauling vehicles along the landfill access road to its intersection with Temescal Canyon Road, and along Temescal Canyon Road ~~between the landfill access road and~~ from the intersection of Interstate 15 (1-15) to the intersection with ~~and Temescal Canyon~~ Weirick Road. At a minimum, USA Waste or its successor-in-interest shall inspect and remove litter and debris from these roadways on a weekly basis and within 48 hours upon receipt of notice of complaint. (Board of Supervisors)	LEA, CIWMB	Litter program to be included in the JTD and reviewed and approved by the LEA and CIWMB prior to issuance of the SWFP.	A-7
Air Quality				
AQ-1	The following activities shall occur based on SCAQMD Rule 1150.1 - Control of Gaseous Emissions from Active Landfills: • Landfill gas collection and thermal destruction systems shall be provided and operated. • Landfill gas destruction system shall be constructed using best available control technology (BACT). Improved combustion technology (e.g., boiler) shall be installed at the time that the continued use of current technology flares would exceed SCAQMD standards for stationary sources. (Final EIR). • A network of landfill gas monitoring probes shall be installed to identify potential areas of subsurface landfill gas migrations.	LEA, SCAQMD	LEA and SCAQMD to review and approve the Authority to Construct (ATC) and the Permit to Operate (PTO) prior to construction of each phase. LEA and SCAQMD to inspect landfill gas collection and monitoring system upon system installation and upon agency discretion through landfill operation. LEA and SCAQMD to review quarterly and annual monitoring/testing reports.	AQ-1

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	• The project includes a landfill gas barrier layer (i.e., 10- to 20-mil high-density polyethylene [HDPE] or polyvinyl chloride [PVC] sheeting) as part of the intermediate cover and final cover system. This gas barrier layer is not required by Subtitle D and would minimize excess air infiltration and fugitive landfill gas emissions, and would increase landfill gas collection efficiency. • Monitoring of landfill gas concentrations at perimeter probes, gas collection system headers, landfill surface, and in ambient air downwind of the landfill shall be conducted in accordance with applicable regulations. • Annual emissions testing of inlet and exhaust gases from the landfill gas destruction system shall be conducted to evaluate gas destruction efficiency. • The gas collection system shall be adjusted and improved based on quarterly monitoring and annual stack testing results.			
AQ-2	The following activities shall occur based on SCAQMD Rule 403 - Fugitive Dust: • Emission controls necessary to assure that dust emissions are not visible beyond the landfill property boundary shall be implemented. • New cell construction and cell closure activities shall not occur simultaneously. • The Rule 403 Fugitive Dust Emissions Control Plan for the landfill, approved by SCAQMD in May 1993, shall be adhered to. The plan itemized various control strategies for dust emissions from earthmoving, unpaved road travel, storage piles, vehicle track-out, and disturbed surface areas, including watering, chemical stabilizers, revegetation, and operational controls or shutdown for implementation during both normal and high wind conditions. • Rule 403 Fugitive Dust Emissions Control Plan shall	LEA, SCAQMD	LEA and SCAQMD to review inspection reports and to conduct inspections upon agency discretion. SCAQMD to review and approve annual revisions of the Rule 403 Dust Emission Control Plan.	AQ-2

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	be revised on an annual basis.			
AQ-3	The following mitigation measures exceed current regulatory requirements and shall be incorporated by design, construction, and operation: • PM_{10} monitoring stations and an onsite meteorological station shall be installed and operated, as agreed in consultation with the SCAQMD. • Where feasible, landfill roads shall be paved. • Portions of paved roads abutting unpaved haul truck traffic areas shall be routinely swept and/or washed. • Onsite vehicles shall be routinely maintained.	LEA, SCAQMD	LEA and SCAQMD to review construction plans prior to construction of each phase. LEA and SCAQMD to conduct inspection upon agency discretion.	AQ-3
AQ-4	In the event monitoring indicates that permissible levels of PM_{10} are being exceeded, some combination of the following dust control measures shall be implemented: (Final EIR) • Washing of truck wheels. • Routing paved access roads away from directions that result in property boundary impacts. • Curtailing specific activities (e.g., new phase construction) when conditions are unfavorable for fugitive PM_{10} control.	LEA, SCAQMD	LEA and SCAQMD to review inspection reports prepared by USA Waste upon agency discretion. LEA and SCAQMD to conduct onsite inspection during construction and through landfill operation upon agency discretion.	AQ-4
AQ-5	The following activities would occur based on SCAQMD Regulation XIII - New Source Review: • Control devices for stationary emission sources shall be provided which satisfy BACT requirements. • NOx, ROG, SOx, and PM_{10} emissions from stationary sources shall be offset according to SCAQMD requirements for essential public services.	SCAQMD	SCAQMD to review and approve the ATC and PTO prior to installation of air emission control devices.	AQ-5
AQ-6	The following activity shall occur based on SCAQMD Regulation XIV - Toxics and Other Noncriteria Pollutants: • Control devices for stationary emission sources shall be provided which assure that emissions of potentially carcinogenic and/or toxic compounds do not result in unacceptable health risks downwind of the landfill.	SCAQMD	SCAQMD to review and approve the ATC and PTO prior to installation of air emission control devices.	AQ-6
AQ-7	Onsite vehicles shall be routinely maintained.	SCAQMD	SCAQMD to review USA Waste	AQ-7

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
			vehicle maintenance records upon discretion of agency.	
AQ-8	Heavy construction equipment shall use low sulfur fuel (<0.05 percent by weight) and shall be properly tuned and maintained to reduce emissions.	SCAQMD	USA Waste to specify sulfur content conditions in contracts for fuel, and maintain contracts on file. SCAQMD to review files upon agency discretion.	AQ-8
AQ-9	Construction equipment shall be fitted with the most modern emission control devices.	SCAQMD	USA Waste to keep records documenting onsite vehicle compliance. SCAQMD to review records upon agency discretion.	AQ-9
AQ-10	The project shall comply with SCAQMD Rule 461 which establishes requirements for vapor control from the transfer of fuel from the fuel truck to vehicles.	SCAQMD	USA Waste to keep records documenting compliance. SCAQMD to review records upon agency discretion.	AQ-10
AQ-11	Prior to construction and construction/operation activities, the following premonitoring measures shall be implemented to avoid or lessen boundary concentrations of $N0_2$: (Board of Supervisors) • Normal landfill operations and cell construction/closure activities shall be preplanned to avoid potentially adverse alignments (both horizontally and vertically) during anticipated periods of meteorological conditions which could result in the greatest property boundary concentration. • During periods when both disposal and construction activities are occurring, downwind property line monitoring of NO_2 shall be implemented for wind and stability conditions which could result in the highest boundary concentrations. During construction and construction/operation activities, the following postmonitoring measures shall be implemented to avoid or lessen boundary concentrations of NO_2: (Board of Supervisors) • If monitoring determines that the 1-hour NO_2 standard (i.e., 470 µg/m3) is being approached (i.e., within 95	LEA, SCAQMD	LEA and SCAQMD to review inspection reports prepared by USA Waste upon agency discretion. LEA and SCAQMD to conduct onsite inspection during construction and through landfill operation upon agency discretion.	AQ-11

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	percent of the standard or approximately 450 µg /m3), construction or cell closure activities shall be curtailed until the appropriate tiered mitigation measures can be implemented, or until adverse meteorological conditions no longer exist. • The waste placement and/or clay preparation areas shall be moved to a preplanned alternative working location to separate emissions from clay placement construction emissions. • Construction procedures shall be configured such that operations requiring heavy equipment do not occur simultaneously (e.g., clay placement and protective soil placement by scrapers will not be done during periods with adverse meteorological conditions). • Construction scheduling will be slowed to reduce daily equipment usage. • Hours of construction with designated pieces of equipment (e.g., scrapers) shall be constrained to occur outside of peak adverse meteorological conditions.			
AQ-12 (Revised)	Within three years of start date [July 1, 2001], USA Waste or its successor-in-interest shall submit to the County of Riverside an evaluation of the technological and economical feasibility of using natural gas fuel or other alternative fuel in transfer trucks. The technological feasibility of the evaluation shall include review comments by the South Coast Air Quality Management District. The evaluation shall be subject to County approval. If the County finds that natural gas fuel or other alternative fuel in transfer trucks is technologically and economically feasible, USA Waste or its successor-in-interest shall develop and implement a program to phase-in transfer trucks capable of using these fuels. The program shall be subject to County approval. If the County concludes that transfer trucks capable of using	RCWMD	The feasibility studies of alternative fuels for transfer trucks to be submitted by USA Waste to RCWMD in accordance with the schedule included in this measure. Alternative fueled transfer trucks to be phased-in by USA Waste upon a determination that they are technologically and economically feasible.	AQ-12

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	alternative fuels are not technologically and economically feasible, USA Waste or its successor-in-interest shall periodically reevaluate the feasibility of using alternative fuels in transfer trucks. Such reevaluations shall be at least every three (3) years. USA Waste or its successor-in-interest shall, however, conduct such a reevaluation anytime deemed appropriate by County.			
AQ-13	The project shall provide the required emission reductions of NO_X and ROG sufficient to cause no net increase of project emissions.	SCAQMD, RCWMD	Prior to the fourth quarter of each calendar year, USA Waste will estimate maximum project emission rates of NO_x and ROG for the upcoming calendar year. USA Waste will also adjust the emission estimates for SCAQMD Priority Reserve emission reduction credits (ERCs) and baseline emission rates at the currently permitted waste disposal rate of 4,000 tons per day. USA Waste will provide written proof of acquisition of NOx, and ROG ERCs in a quantity at least equal to the difference between the adjusted emission rates (see above) and the SCAQMD emission rate thresholds for facility operations. The information described above will be incorporated as part of the Annual Mitigation Monitoring Program Status Report and provided to the SCAQMD and RCWMD at least 90 days prior to the start of each calendar year. USA Waste to keep records documenting compliance. SCAQMD	AQ-13

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
			and RCWMD to review records upon agency discretion.	
AQ-14	USA Waste shall amend its Policies and Procedures Manual at the landfill to require that heavy construction and operating equipment at the landfill shall not idle for longer than 15 minutes.	RCWMD	USA Waste to keep records documenting compliance. RCWMD to review records upon its discretion.	AQ-14
Biological Resources				
B-1 (Revised)	Development shall be phased so that the area to be disturbed shall be minimized. Restoration of previously disturbed areas shall be performed in accordance with the *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto.	USFWS, CDFG, ACOE, RWQCB, RCWMD	Ongoing monitoring and reporting to be conducted in accordance with the approved *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement through landfill operation and postclosure monitoring period.	B-1
B-2 (Revised)	Areas within the landfill limits of disturbance shall be restored with Riversidian sage scrub in accordance with the *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto.	USFWS, CDFG, ACOE, RWQCB, RCWMD	Ongoing monitoring and reporting to be conducted in accordance with the approved *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement through landfill operation and postclosure monitoring period.	B-2
B-3 (Revised)	Dudleya salvaging and restoration shall be performed in accordance with the Multiple Species Habitat Conservation Plan for the El Sobrante Landfill and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto.	USFWS, CDFG, ACOE, RWQCB, RCWMD	Ongoing monitoring and reporting to be conducted in accordance with the approved *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement through landfill operation and postclosure monitoring period.	B-3
B-4 (Revised)	Prior to disturbance to wetland/riparian areas, a wetland compensation and mitigation plan shall be developed in consultation with the ACOE, if a 404 Permit is required, the CDFG, pursuant to Section 1603 of the California Fish and Game Code, the RWQCB, pursuant to 401 Water Quality requirements and/or policies to protect wetlands, and the USFWS, if consultation is triggered pursuant to	USFWS, CDFG, ACOE, RWQCB, RCWMD	The wetland compensation and mitigation plan to be developed in consultation with the USFWS and CDFG. The final determination of wetland mitigation ratios to be made by the USFWS, ACOE, and CDFG.	B-4

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	Section 7 of the Endangered Species Act. Mitigation of riparian habitats shall be targeted at a 3:1 ratio with compensation of 6.36 acres. Target mitigation of an additional 1.28 acres of riparian herb vegetation shall be at a 1:1 ratio. Final determination of mitigation ratios shall be made subsequent to onsite evaluation by the ACOE, CDFG, RWQCB, and/or USFWS and shall not be unreasonable or arbitrary.		Ongoing monitoring and reporting to be conducted in accordance with the approved wetland compensation and mitigation plan through landfill operation and postclosure monitoring period.	
B-5	Activities to mitigate the disturbance to wetlands may include, but are not limited to: • Identification and assessment of sites and specific riparian mitigation measures along Temescal Wash. • Enhancement of degraded areas within existing channels. • Weed removal to improve existing riparian habitat. • Potential purchase of offsite riparian habitat.	USFWS, CDFG, ACOE, RWQCB, RCWMD	The wetland compensation and mitigation plan to be developed in consultation with the USFWS and CDFG. The final determination of wetland mitigation ratios to be made by the USFWS, ACOE, and CDFG. Ongoing monitoring and reporting to be conducted in accordance with the approved wetland compensation and mitigation plan through landfill operation and postclosure monitoring period.	B-5
B-6 (Revised)	The purchase of offsite riparian/wetland habitat shall be incorporated into the mitigation plan in the event that the ACOE Section 404 permit and CDFG Section 1603 agreement process conclude that onsite enhancement and offsite mitigation along Temescal Wash could not provide sufficient compensation for disturbance to onsite riparian habitat. If this mitigation were implemented, surveys shall be conducted in coordination with USFWS and CDFG to identify offsite riparian habitat that would be suitable for purchase as mitigation for onsite habitat disturbance. Considerations shall include, but not be limited to: • Proximity to landfill site. • Similarity of adjacent habitat. • Management plans.	USFWS, CDFG, ACOE	The wetland compensation and mitigation plan to be developed in consultation with the USFWS, CDFG, and ACOE. The purchase of offsite riparian/wetland habitat, if such purchase is required, to be incorporated into the wetlands compensation and mitigation plan developed in consultation with the USFWS, CDFG, and ACOE.	B-6

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	• Comparability. • Sustainability. • Cost.			
B-7 (Revised)	Wetland/riparian habitat mitigation shall be implemented in accordance with all permits, approvals, and/or agreements as may be required by ACOE, CDFG, RWQCB, and/or USFWS.	ACOE, CDFG, RQQCB, USFWS	Ongoing monitoring and reporting to be conducted in accordance with the approved wetland compensation and mitigation plan through landfill operation and postclosure monitoring period.	B-7
B-8	Landfill personnel shall be instructed as to the requirement for and importance of restoration of completed areas of the site.	USFWS, CDFG	USA Waste to instruct personnel and to provide copy of training materials to the USFWS and CDFG prior to closure of the initial phase of the expanded landfill.	B-8
B-9 (Revised)	Approximately 406 acres of undisturbed open space, upon which a Declaration of Conservation Covenants and Restrictions has been recorded in favor of CDFG and USFWS, shall be maintained and managed for the benefit of Covered Species, pursuant to federal and state incidental take permits and the *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto.	RCWMD	Ongoing monitoring and reporting to be conducted in accordance with the approved *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement through landfill operation and postclosure monitoring period.	B-11
B-10	Pursuant to Section 5 of the Agreement, USA Waste or its successor-in-interest shall pay the County a per ton charge for the deposit of Non-County waste at El Sobrante Landfill, $1.50 of which shall be utilized for multi-species habitat acquisition and management, including planning and research activities, as provided in Section 10.7 of the Agreement and as approved by the Board of Supervisors on September 1, 1998. Monies to be utilized for multi-species purposes shall be deposited in a trust fund administered by the Executive Officer of the County.	RCWMD	Landfill scales to be operated by RCWMD ongoing through the operation of the landfill. RCWMD to collect $1.50/ton and disburse funds to appropriate agencies, ongoing through the operation of the landfill.	B-13
B-11	In the unlikely event that out-of-County waste ceases to be disposed of at El Sobrante, use of the 60 million tons of air space currently allocated for out-of-County waste shall	RCWMD	Landfill scales to be operated by RCWMD ongoing through the operation of the landfill.	B-14

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	include the requirement for payment of $1.00 per ton for multispecies habitat acquisition and management.		RCWMD to collect $1.00/ton for in-County waste in the event that out-of-County waste ceases to be disposed of at the landfill, and disburse funds to appropriate agencies, ongoing through the operation of the landfill.	
B-12	Lighting at the working face shall be downcast and shielded to minimize reflection, and shall be directed inward toward the landfill.	RCWMD	RCWMD to conduct inspections at their discretion.	B-15
B-13 (Revised)	A predator monitoring and control plan shall be implemented in accordance with the *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto.	USFWS, CDFG	Ongoing monitoring and reporting to be conducted in accordance with the approved *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement through landfill operation and postclosure monitoring period.	B-16
B-14 (Revised)	Brush clearing and habitat removal in each phase of landfill expansion will not be allowed to occur between February 1 and August 15, pursuant to the *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto.	USFWS, CDFG	USFWS and CDFG to review landfill development phasing plans prior to construction of each phase. USFWS and CDFG to monitor landfill site habitat and landfill development per discretion of the respective agencies.	B-17
B-15 (Revised)	When the landfill expansion is complete (i.e., after closure of all phases and at the end of the postclosure monitoring maintenance period [currently a minimum of 30 years]), including all restoration activities in accordance with the *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto, the area of onsite disturbance (approximately 645 acres) shall be kept in permanent conservation through a conservation easement in favor of the CDFG. In the event that CDFG revokes its acceptance	RCWMD	Ongoing monitoring and reporting to be conducted in accordance with the approved *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement through landfill operation and postclosure monitoring period.	B-18

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	of the conservations easement, the land shall be placed into conservation with the County, or other County-designated entity, such as Western Riverside County Regional Conservation Authority as approved by the US Fish and Wildlife Service and the El Sobrante habitat management committee.			
B-16 (Revised)	USA Waste or its successor-in-interest shall continue to include the County in all aspects of future permitting processes involving USFWS, pursuant to Section 7 of the Endangered Species Act, CDFG, pursuant to Section 1603 of the California Fish and Game Code, ACOE 404 permitting, and RWQCB, pursuant to 401 Water Quality requirements and/or policies to protect wetlands.	RCWMD	Upon the request of the County, USA Waste will cooperate in discussions with the USFWS regarding the development of an agreement that allows a portion of the multispecies mitigation monies to be used for research and planning.	B-19
Cultural Resources				
C-1	Prior to grading, a Society of Professional Archaeologists (SOPA)-certified archaeologist(s) shall be retained, at the expense of the project, to provide surface collection, mapping, and test excavations for identified archaeological sites. If the sites are determined to be important, the resources within these sites shall be either preserved or a data recovery excavation shall be conducted.	RCPD	RCPD to determine appropriate action based on archaeologist's findings during each landfill expansion phase.	C-1
C-2	In the event that additional archaeological sites are uncovered during initial grading, work shall be redirected and an archaeologist shall be retained at the expense of the project, to evaluate the importance of the site and, if necessary, shall develop and implement an appropriate data recovery program. The archaeologist shall be allowed to redirect grading in the area of exposed resources until inspection, evaluation, and recovery activities are completed.	RCPD	RCPD to review reports submitted by the approved archaeologist upon discovery of additional resource sites. RCPD to approve commencement of grading activities upon completion of resource evaluation/recovery.	C-2
C-3	Routine road or stormwater facilities, maintenance or other land-altering activities in the vicinity of sites shall be monitored by a SOPA-certified archaeologist to prevent inadvertent disturbance or loss of important resources.	RCPD	RCPD to review semiannual monitoring reports submitted by the approved archaeologist.	C-3

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
			RCPD to determine appropriate action based on archaeologist's findings during each landfill expansion phase.	
C-4	The status of the sites shall be monitored on a semi-yearly basis to assure that incidental disturbance or recreational collection of resources has not occurred.	RCPD	RCPD to review semiannual monitoring reports submitted by the approved archaeologist. RCPD to determine appropriate action based on archaeologist's findings during each landfill expansion phase.	C-4
C-5	Archaeological materials recovered during surface collections, subsurface excavations, and monitoring shall be curated in perpetuity at a regional repository approved by the County. Expenses for curation shall be borne by the project.	RCPD	RCPD to approve regional repository prior to surface collections of cultural resources. RCPD to review semiannual monitoring reports submitted by the approved archaeologist. RCPD to maintain inventory list of materials curated from the site, upon initial surface collection and upon discovery of any additional resource sites.	C-5
C-6	While the archaeological sites that will be affected by the proposed project are not expected to include human remains or burial artifacts, should such items be discovered during subsurface testing or data recovery, or if such items are discovered at unknown sites during construction or operation of the proposed action, project-related earthmoving activities shall be redirected away from the area. A SOPA-certified archaeologist shall consult with the County and representatives of local Native American groups regarding removal and re-interment.	RCPD	RCPD to review semiannual monitoring reports submitted by the approved archaeologist. Archaeologist to notify RCPD upon finding human remains or burial artifacts. RCPD to consult with Native American Groups and determine appropriate action upon discovery of human remains or burial artifacts.	C-6

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
C-7	The approved archaeological mitigation measures shall be affixed to all copies of the project grading plans.	RCBSD	RCBSD to attach measures upon approval of grading plans and prior to issuance of grading permits.	C-7
Geology, Soils and Seismicity				
G-1	The landfill and associated structures shall be designed and constructed to withstand the expected ground motions and potential effects of seismic ground shaking.	RCBSD, LEA, RWQCB, CIWMB	Building plans to be reviewed and approved at the discretion of RCBSD prior to issuance of grading permits (building permits for structure). Building to be inspected at the discretion of the RCBSD prior to occupancy certification. Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB prior to initiation of operations of the landfill expansion and through the life of the expansion.	G-1
G-2	Final exterior waste fill slopes shall not be steeper than 1.75:1 with a minimum of one 15-foot wide bench for every 50-feet of vertical height.	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB through the life of the expansion.	G-2
G-3	A slope or foundation stability report shall be prepared by a registered civil engineer or certified engineering geologist. The report must indicate at least a 1.5 factor of safety for the critical slope under dynamic conditions, or	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase.	G-3

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	appropriate factor of safety in accordance with applicable regulations.		Landfill to be inspected at the discretion of the LEA and RWQCB through the life of the expansion.	
G-4	In lieu of achieving a 1.5 factor of safety under dynamic conditions, a more rigorous analytical method that provides a quantified estimate of the magnitude of movement may be employed.	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB through the life of the expansion.	G-4
G-5	Significant slopes (including cut, fill, and waste prism slopes greater than 20 feet high and steeper than 3:1) shall be designed to comply with RWQCB and CIWMB requirements for the identified maximum probable earthquake peak acceleration.	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB through the life of the expansion.	G-5
G-6	RWQCB and CIWMB requirements shall be complied with, and the final cover surface slopes shall be limited to 3:1, based on seismic considerations, with intermediate fill stage heights limited to 70 feet, with 15-foot wide benches to improve stability, unless subsequent analyses verify the acceptability of steeper slopes or greater fill heights. Under no circumstance, however, shall the final exterior waste fill slope be steeper than 1.75:1 (see G-2 above).	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB through the life of the expansion.	G-6
G-7	Slope buttresses shall be provided, if necessary, to increase slope stability and reduce deformations.	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB through the	G-7

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
			life of the expansion.	
G-8	Parameters developed by geosynthetic and geotechnical testing shall be included in the analysis of liner systems on side slopes. Residual strength values (i.e., after shearing) shall be used, unless control of peak strengths can be demonstrated.	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB through the life of the expansion.	G-8
G-9	A post-earthquake inspection plan shall be submitted to the RWQCB and CIWMB, for approval which provides for detailed site inspection after an earthquake of magnitude (M) 5.0 or greater within 25 miles of the site to determine the integrity of landfill structures and systems. The plan shall identify appropriate measures which may be initiated to correct earthquake-related damage. Also, a routine inspection plan shall be developed and implemented by a registered certified engineer to examine slope conditions. (Final EIR)	LEA, RWQCB, CIWMB	The LEA and RWQCB to review and approve plan for the landfill prior to issuance of the SWFP. Routine inspections to be conducted by a registered engineer or registered geologist in accordance with the approved plan.	G-9
G-10	If geotechnical investigations reveal the need for blasting for a specific landfill phase, a blasting study shall be conducted in compliance with County requirements. If such a study is necessary, it shall be conducted by a licensed engineer and submitted to the County Engineering Geologist for approval.	RCPD	County Engineering Geologist (RCPD) to determine potential necessity for blasting study prior to approval of each landfill expansion phase.	G-10
G-11	If isolated saturated bedrock conditions are encountered in cut slopes, appropriate drainage systems shall be installed. These systems could consist of weep systems, subdrain systems, or the flattening of excavated cut slopes to improve slope stability.	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB through the life of the expansion.	G-11
G-12	Landfill liners shall be placed over the side slopes, and surface water runoff control systems (e.g., V-ditches at the	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and	G-12

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	top of slopes) shall be constructed to prevent uncontrolled flow down the face of the slopes. (Final EIR)		CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB through the life of the expansion.	
G-13	Structural fills shall be built above ground water and compacted in place to a specific high relative density.	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB through the life of the expansion.	G-13
G-14	Expansive index testing shall be performed to verify the suitability of native soils for fill materials. If testing indicates a potential for high expansiveness in the soil, such soils shall be either treated (e.g., mixed with non-expansive soils) or removed.	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB through the life of the expansion.	G-14
G-15	Blasting shall be conducted in compliance with local building code requirements to prevent damage to structures and new construction from shear waves generated during blasting.	RCPD	County Engineering Geologist (RCPD) to approve independent, qualified consultant to monitor blasting operation prior to construction of each landfill phase which will involve blasting.	G-15
G-16	Only state-licensed blasters shall be used to design, supervise, and detonate explosives on the site.	RCPD	County Engineering Geologist (RCPD) to verify state-licensing of contractor prior to each blasting operation.	G-16
G-17	Seismic monitoring of each blast shall be conducted by an independent, qualified consultant.	RCPD	County Engineering Geologist (RCPD) to approve monitoring consultant prior to each construction phase requiring blasting.	G-17

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
			Consultant to provide information to the RCPD upon request during construction phases requiring blasting.	
G-18	There shall be no onsite storage of explosives. Explosives shall be transported to the site by the licensed blaster on an as-needed basis.	RCPD	County Engineering Geologist (RCPD) to monitor blasting operations and verify that there is no onsite storage of explosives through each construction phase and ongoing operation of the landfill.	G-18
G-19	USA Waste shall inform the Riverside County Sheriffs Department (Sheriffs Dept.) and the Riverside County Fire Department (Fire Dept.) prior to blasting.	RCPD	County Engineering Geologist (RCPD) to confirm notification of Sheriff's and Fire Departments prior to each construction phase involving blasting.	G-19
G-20	USA Waste shall notify neighbors within 1,000 feet of potential blasting areas prior to a blasting episode.	RCPD	County Engineering Geologist (RCPD) to receive copies of notifications and copy of distribution list from USA Waste prior to each blasting operation.	G-20
G-21	A record of each blast shall be retained for at least three years and shall be submitted to the County Building and Safety Department as requested by the Building and Safety Director.	RCBSD	Upon completion of each blasting phase, state-licensed blaster to provide reports to USA Waste for record maintenance. USA Waste to provide copies of blasting records to the RCBSD upon request.	G-21
G-22	Preblast inspections shall be made by a civil engineer licensed by the State of California of residences and facilities existing at the time of landfill permit approval and located within 1,000 feet of potential blasting areas.	RCPD	County Engineering Geologist (RCPD) to review inspection report prior to initial blasting operation.	G-22
G-23	A letter containing a general description of the blasting operations and precautions, including the blast-warning whistle signals that are required by the State of California Construction Safety orders, shall be sent to residents within a one-half mile radius of the landfill operations by USA Waste in accordance with applicable regulations.	RCPD	County Engineering Geologist (RCPD) to review and approve letter and distribution prior to initial blasting operation.	G-23
G-24	Blasting complaints, if any, shall be recorded by USA Waste as to complainant, address, data, time, nature of the	RCPD, RCBSD, LEA	County Engineering Geologist, RCPD, RCBSD, and LEA to review complaints	G-24

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	complaint, name of the person receiving the complaint, and the complaint investigation conducted. Complaint records shall be made available to the County Engineering Geologist, Planning Department, and Building and Safety Department.		upon discretion of each respective department.	
Land Use and Land Use Plans				
L-1	The development of El Sobrante Landfill Expansion shall be in accordance with the mandatory requirements of all applicable County ordinances and shall conform substantially with the project description in the EIR (State Clearinghouse No. 90020076), as filed in the office of the RCWMD.	RCWMD, RCPD	The plans for the development of the landfill are to be reviewed and approved by RCWMD and RCPD to assure compliance with applicable County ordinances.	L-1
L-2	Prior to any offsite grading, USA Waste or its successor-in-interest shall obtain and record appropriate offsite easements.	RCWMD	Recorded easements for offsite areas to be provided to RCWMD prior to grading for each area.	L-2
L-3	A Citizen Oversight Committee shall be formed by the Board of Supervisors upon approval of the project. The Citizen Oversight Committee shall be composed of a total of five (5) members, whose term of service will be established upon formation of the committee. Three (3) of the five (5) members will be appointed by the Supervisor of the district in which the landfill is located. Of these three (3), two (2) members must reside within a three (3) mile radius of the landfill property. One (1) member shall be a representative from a corporate operation within a three (3) mile radius of the landfill property. The remaining two (2) members will be appointed by the entire Board of Supervisors and shall be chosen at large to represent the affected communities of interest.	County Board of Supervisors	The Citizen Oversight Committee to be established by the Board of Supervisors. The Citizen Oversight Committee to meet at least once annually.	L-3
L-4	The Citizen Oversight Committee shall meet at least once annually to review the Annual Status Reports that will be submitted by an Administrative Review Committee which will include all reports and data that will be provided by USA Waste or its successor-in-interest and shall submit written comments on the project to the Board of	County Board of Supervisors	The Citizen Oversight Committee to be established by the Board of Supervisors. The Citizen Oversight Committee to meet at least once annually.	L-4

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	Supervisors as they deem necessary.			
Noise				
N-1	Excavation and liner construction of new landfill cells shall be limited to the hours of 8:00 a.m. to 5:00 p.m., Monday through Saturday.	LEA	USA Waste to provide operating plans to the LEA prior to excavation and linear construction of new landfill cells. LEA to monitor construction operations at its discretion throughout the excavation and construction of the liner.	N-1
N-2	Landfill equipment working on the outside slopes of the landfill shall be limited to the hours of 8:00 a.m. to 5:00 p.m.	LEA	USA Waste to provide operating plans to the LEA prior to excavation and linear construction of new landfill cells. LEA to monitor construction operations at its discretion throughout the excavation and construction of the liner.	N-2
N-3	Construction equipment shall use industrial-grade mufflers to reduce noise emission.	LEA	USA Waste to keep records documenting onsite vehicle compliance. LEA to review records upon agency discretion. LEA to inspect vehicles upon agency discretion.	N-3
N-4	Blasting shall be postponed during temperature inversions and unfavorable wind conditions (wind blowing toward residences).	RCPD	Licensed blasting contractor to monitor climatic conditions and postpone blasting in adverse conditions. As appropriate, contractor shall document climatic conditions in blast records to be maintained by USA Waste. County Engineering Geologist (RCPD) to coordinate with blasting contractor to assure suspension of blasting during unfavorable conditions. County Engineering Geologist (RCPD) to	N-4

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
			respond to noise complaints, if any, during construction of each landfill expansion phase requiring blasting.	
N-5	Drilling and blasting shall be conducted between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday, and will not occur on federal, state, and local holidays.	RCPD	County Engineering Geologist (RCPD) to monitor operations during construction of each landfill expansion phase requiring blasting.	N-5
N-6	Acoustic blankets shall be used around drilling operations to reduce potential drilling noise.	RCPD	County Engineering Geologist (RCPD) to monitor operations during construction of each landfill expansion phase requiring blasting.	N-6
N-7	Wherever feasible, temporary earthen or landscape berms, or other structures or measures, shall be utilized to reduce potential noise impacts on surrounding homeowners from nighttime activities at the working face of El Sobrante. Any measures implemented for this purpose shall be subject to annual review by the Citizen Oversight Committee.	LEA	USA Waste to keep records of measure implemented to reduce potential nighttime noise impacts to surrounding homeowners. LEA to inspect the landfill at its discretion and respond to noise complaints, if any.	N-7
Paleontological Resources				
P-1	A qualified paleontologist shall be retained, at the expense of the project, to monitor ongoing grading or other extensive activities in the Silverado Canyon and Lake Mathews formations. The monitoring program shall reflect the County's intent to research, recover, and preserve significant paleontological resources.	RCPD	RCPD to review and approve monitoring program submitted by paleontologist prior to issuance of grading permits.	P-1
P-2	In the event that significant paleontological resources are uncovered during excavation, earthmoving and/or grading, work shall be redirected from the area until an appropriate data recovery program can be developed and implemented.	RCPD	RCPD to be notified of discovery (by paleontologist) and enforce direction of grading activity, as necessary, through each phase of landfill construction.	P-2
P-3	Recovered fossils shall be cleaned, cataloged, and identified to the lowest taxon possible. A report containing monitoring results, including an itemized list of fossils, shall be submitted to the County. A copy shall	RCPD	RCPD to maintain copies of fossil inventory to be prepared and submitted by the approved paleontologist in accordance with the approved	P-3

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	accompany the fossils to an appropriate repository.		monitoring plan.	
P-4	Collected fossils shall be curated at a public institution with an educational/research interest in the material. The expenses shall be borne by the project.	RCPD	RCPD to approve repository upon collection of fossils during initial construction phase. RCPD to verify submittal of monitoring results and fossil inventory to the repository upon completion of initial construction phase and subsequent phases.	P-4
P-5	The approved paleontologic mitigation measures shall be affixed to all copies of the project grading plans.	RCBSD	RCBSD to attach measures upon approval of grading plans and prior to issuance of grading permits.	P-5
Traffic and Circulation				
T-1	Out-of-County waste from Los Angeles County, Orange County, San Bernardino County, and San Diego County shall be transported to El Sobrante by transfer trucks.	RCWMD, LEA	RCWMD and LEA to monitor out-of-County waste receipt at landfill scales.	T-2
T-2	Transportation of out-of-County waste from areas other than Los Angeles County, Orange County, San Bernardino County, and San Diego County shall not be permitted without additional environmental review and approval.	RCWMD, LEA	RCWMD and LEA to monitor out-of-County waste receipt at landfill scales.	T-4
T-3	Transfer trucks hauling waste from out-of-County to El Sobrante that use State Route (SR) 91 shall travel to and from the landfill during off-peak hours for SR 91.	RCWMD, RCTD	USA Waste to provide truck routing and scheduling information to RCWMD and RCTD.	T-5
T-4	Vehicles delivering waste from out-of-County to be disposed at El Sobrante shall utilize on all trips (both inbound and outbound) only that portion of Temescal Canyon Road between its intersection with 1-15 and the landfill access road, except in the event of a closure of the on- and/or offramps at Temescal Canyon Road and 1-15.	RCWMD, RCTD	USA Waste to provide truck routing and scheduling information to RCWMD and RCTD.	T-6
T-5	Except for vehicles collecting waste in the immediate vicinity of El Sobrante, USA Waste's or successor's-in-interest collection vehicles delivering waste from in-County to be disposed at El Sobrante shall utilize only that portion of Temescal Canyon Road between its intersection	RCWMD, RCTD	USA Waste to provide truck routing and scheduling information to RCWMD and RCTD.	T-7

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	with 1-15 and the landfill access road for all trips (both inbound and outbound), except in the event of a closure of the on-and/or off-ramps at Temescal Canyon Road and I-15.			
Public Services and Utilities				
U-1	Access roads/streets shall be wide enough to accommodate movement and parking without hindering the flow of traffic. Roadway modifications shall be designed to provide smooth and orderly traffic flow and shall be well lighted.	RCTD	RCTD to approve road improvement plans and inspect completed improvements prior to construction of the initial landfill expansion phase.	U-1
U-2	Warning or caution signs shall be placed on Temescal Canyon Road and the El Sobrante access road to indicate the presence of slow-moving traffic/trucks.	RCTD	RCTD to review and approve proposed traffic control devices prior to construction of the initial landfill expansion phase. RCTD to inspect devices upon installation.	U-2
U-3	Upon assignment of a numbered street address by the County, the project entrance shall be clearly marked with address numbers.	RCTD	RCTD to inspect address numbers prior to construction of the initial landfill expansion phase.	U-3
U-4	Buildings shall be constructed with fire retardant roofing material as approved by the County Fire Department.	RCBSD	Building plans to be reviewed and approved by the RCBSD prior to issuance of building permits. RCBSD to inspect buildings upon completion.	U-4
U-5	Water mains and fire hydrants providing required fire flows shall be constructed subject to approval by the County Fire Department.	RCFD	RCFD to review and approve water system plans prior to issuance of building permits.	U-5
U-6	Prior to approval of any development plan for lands adjacent to open space areas, a fire protection/revegetation management plan shall be submitted to the Riverside County Fire Department for review and comment.	RCFD	RCFD to review And approve protection/revegetation plan prior to the construction of each phase.	U-6
U-7	Landfill equipment operators, waste transfer vehicle drivers, and landfill personnel assigned to nighttime	LEA	USA Waste to maintain records and provide verification of appropriate	U-7

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	operations shall have appropriate training for night operation of heavy equipment.		employee training to LEA upon request.	
U-8	Portable lights shall be used at the working face to provide a safe working environment during nighttime operations.	LEA	The LEA to inspect the site at their discretion.	U-8
U-9	The landfill access road and onsite roads to the working face shall be equipped with reflectors, reflective cones, reflective barriers and signs.	LEA	LEA to review and approve proposed traffic control devices prior to construction of the initial landfill expansion phase. LEA to inspect devices upon installation and throughout operation of landfill per agency discretion.	U-9
U-10	Public access to the landfill shall be restricted to the hours of 6:00 a.m. to 6:00 p.m.	LEA	LEA to inspect site records at its discretion to assure hours of operation are enforced.	U-10
U-11	Installation of low flow toilets, faucets, and showers.	RCBSD	RCBSD to review and approve building and facility plans prior to issuance of building permits. RCBSD to inspect buildings upon completion.	U-11
U-12	Wastewater shall go to the Lee Lake Treatment Facility, which makes water available for reuse.	RCWMD, RCEHA	RCWMD and RCEHA to review and approve wastewater system plans prior to construction of the initial phase of the expansion.	U-12
Water Resources				
W-1	Drainage structures, such as the perimeter drainage channels, sedimentation basins, leachate evaporation ponds, stormwater retention basins, and collection pipes and ditches, shall be inspected and maintained on a regular basis.	RCFCD, RWQCB, LEA	Improvements to be inspected upon construction and ongoing through the life of the expansion at the discretion of RCFCD, LEA, and RWQCB.	W-1
W-2	Regular monitoring (and possibly testing) of perimeter drainage channels and retention ponds shall be completed to assure that discharged stormwater does not contain contaminants from the landfill.	RCFCD, RWQCB	RCFCD and RWQCB to review USA Waste records and conduct monitoring and/or testing per discretion of their respective jurisdictions.	W-2

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
W-3	A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared. It shall include a Spill Prevention and Response Plan and a monitoring plan. The facility shall implement "best management practices" as required by NPDES.	RWQCB	SWPPP to be reviewed and approved by RWQCB prior to issuance of the SWFP.	W-3
W-4	Leachate shall be collected by the leachate collection and removal system (LCRS) installed at the base of each landfill cell. Such leachate shall be sampled regularly and, if necessary, treated prior to use for dust control on lined areas of the landfill.	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB through the life of the expansion.	W-4
W-5	Stormwater runoff that falls on the active working face of the landfill shall be diverted to a collection sump and reused for dust control on lined areas of the landfill. The sump for stormwater runoff from the active working face shall be designed to hold the runoff from the 100-year, 24-hour storm.	LEA, RWQCB, CIWMB	Landfill design to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Landfill to be inspected at the discretion of the LEA and RWQCB through the life of the expansion.	W-5
W-6	Drainage improvements shall be designed and constructed to provide all-weather access to the landfill.	RCTD, RCFCD	RCTD and RCFCD to review drainage improvement plan for landfill access prior to construction of such improvements.	W-6
W-7	To reduce the quantity of water used, the following measures shall be implemented: • Low-flow plumbing fixtures shall be installed for onsite facilities. • Washwater for cleaning equipment at the operations and maintenance center shall be collected and recycled, and reused for washing or dust control. (Final EIR) • Stormwater that falls on the active working face of the landfill shall be collected and used for dust control.	RCBSD	RCBSD to review building plans (and washing facility plans) at its discretion prior to issuance of building permits. RCBSD to inspect facilities at its discretion upon construction.	W-7
W-8	The liner system for the expansion of El Sobrante shall	LEA, RWQCB,	Linear design of each expansion phase	W-8

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	meet the following requirements: (Board of Supervisors) • The liner system (inclusive of the bottom liner and the sideslope liner) of the landfill shall exceed the requirements of Subtitle D and California Code of Regulations (CCR) Title 27 and shall be composed of the alternative bottom liner (identified as Alternative Bottom Liner B2) and the alternative sideslope liner (identified as Sideslope Liner Alternative S2), which are both described and evaluated in Evaluation of Liner System Alternatives, El Sobrante Landfill Expansion, Riverside County, California, prepared by GeoSyntec Consultants and dated February 1998. • If it is determined that this liner system will not meet the requirements of the regulatory agencies, a substitute liner system must be approved by the regulatory agencies, and evidence of such a determination shall be forwarded to the El Sobrante Landfill Administrative Review Committee of Riverside County. In this event, the substitute liner system shall be composed of a bottom liner and a sideslope liner that are at least equal to Alternative Bottom Liner B2 and Sideslope Liner Alternative S2, respectively, and must be approved by the Administrative Review Committee.	CIWMB	to be reviewed at the discretion of the LEA, RWQCB, and CIWMB prior to construction of each phase. Liners to be inspected at the discretion of RWQCB upon installation and prior to receiving waste for each expansion phase.	
W-9	Landfill gas collectors shall be placed as compacted lifts of waste are finished. Once sufficient waste has been placed above the collectors to prevent air intrusion, the collectors shall be used for active landfill gas extraction.	LEA, RWQCB, CIWMB, SCAQMD	Landfill gas collection system to be reviewed at the discretion of the LEA, RWQCB, CIWMB, and SCAQMD prior to construction of each phase. LEA, RWQCB, and SCAQMD to review landfill gas monitoring reports (provided by USA Waste) and inspect systems. Report review to be conducted periodically and inspections upon agency discretion.	W-9

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
W-10	The final cover of the landfill shall conform to Subtitle D and CCR Title 27, and shall consist of a minimum of four (4) feet of vegetative layer in accordance with the augmented cover described in the EIR (State Clearinghouse No. 90020076). Any change from the augmented cover shall require clearance from the RCWMD, the California Integrated Waste Management Board (CIWMB), Regional Water Quality Control Board (RWQCB), the U.S. Fish and Wildlife Service (USFWS), and the California Department of Fish and Game (CDFG).	LEA, RWQCB	Cover system to be reviewed at the discretion of the LEA and RWQCB prior to closure of each phase. Cover to be inspected at the discretion of the RWQCB upon installation.	W-10
W-11	In accordance with applicable regulations, landfill gas shall be monitored at the landfill perimeter and in the vadose zone.	LEA, RWQCB, SCAQMD	Monitoring reports to be submitted to and reviewed by the LEA, RWQCB, and SCAQMD ongoing through operation of the landfill, and during the postclosure monitoring period.	W-11
W-12	"Point of compliance" ground water monitoring wells, as required by CCR Title 27, shall be installed along the downgradient perimeter of the landfill footprint, pursuant to a monitoring plan approved by the RWQCB. These wells shall be sampled on a quarterly basis beginning one year prior to landfilling each respective cell, and will provide a secondary warning of a leak in the liner system.	LEA, RWQCB	LEA and RWQCB to review and approve location of ground water monitoring wells prior to issuance of SWFP and WDRs. LEA and RWQCB to review quarterly monitoring reports beginning one year prior to landfilling each respective cell.	W-12
W-13	If leachate or landfill gas generated by the landfill expansion were determined to be a potential risk to ground water, a corrective action plan shall be developed and implemented in conjunction with the RWQCB as required by CCR Title 27.	LEA, RWQCB, SCAQMD	Leachate and landfill gas monitoring reports to be reviewed quarterly by the LEA, RWQCB, and SCAQMD. As necessary, corrective action plan to be developed and implemented in consultation with RWQCB.	W-13
W-14	Whenever a specified material, design, system or action is required by the project or any exhibit thereto, USA Waste or its successor-in-interest may substitute such material, design, system or action, provided that: (Board of Supervisors)	RCWMD, LEA, RWQCB	Design of each expansion phase to be reviewed at the discretion of the LEA, RWQCB, and RCWMD prior to construction of each phase.	W-15

Mitigation No.	Mitigation Measure	Responsible Agencies[1]	Implementation and Timing[1]	Previous Mitigation No.[2]
	Such material, design, system or action complies with applicable Federal, State, and local regulations; and, Any Federal, State or local regulatory agency having jurisdiction has approved the use of the material, design, system or action for similar facilities (i.e., Class III landfills); and, The General Manager - Chief Engineer of the RCWMD, with concurrence of the appropriate regulatory agency(ies), has determined that such material, design, system or action is technically equal, or superior to, those required in these conditions.		Construction of each phase of the expansion to be inspected at the discretion of LEA, RWQCB and RCWMD prior to receiving waste for each expansion phase.	
W-15	USA Waste or its successor-in-interest shall deposit 50 cents per ton into a Third Party, Environmental Impairment Trust, which fund shall be established and maintained throughout the life of the project. Any balance in the existing fund contributed by USA Waste or its successor-in-interest under the First El Sobrante Landfill Agreement, as amended, shall continue to accrue with deposits from all waste delivered to the site on or after the start date, including interest earnings on the funds, until the fund has reached a total of $2,000,000, at which time deposits may be discontinued until withdrawals cause the fund to fall below the $2,000,000 cap. The cap shall increase annually by 90 percent of the change in the Consumer Price Index (CPI) starting in the year 2002.	RCWMD	An Environmental Impairment Trust to be established upon receipt of the SWFP for the landfill. Funds to be withdrawn from the Environmental Impairment Trust only for environmental remediation purposes with the approval of USA Waste and the RCWMD.	W-16
W-16	Monies may be withdrawn from the Environmental Impairment Trust only for environmental remediation purposes with approval by USA Waste or its successor-in-interest and the General Manager - Chief Engineer of the RCWMD. The Trustee shall be required to report quarterly to the Department on all fund activity and balances.	RCWMD	An Environmental Impairment Trust to be established upon receipt of the SWFP for the landfill. Funds to be withdrawn from the Environmental Impairment Trust only for environmental remediation purposes with the approval of USA Waste and the RCWMD.	W-17

1. Definition of Acronyms: RCWMD = Riverside County Waste Management Department; LEA = Local Enforcement Agency; RCBSD = Riverside County Building and Safety Department; RCEHA = Riverside County Environmental Health Agency; RCFCD = Riverside County Flood Control District; RCFD = Riverside County Fire Department; RCPD = Riverside County Planning Department; RCTD = Riverside County Transportation Department; SCAQMD = South Coast Air Quality Management District; CIWMB = California Integrated Waste Management Board; RDSO = Report of Disposal Site Information (included as part of the Joint Technical Document); JTD = Joint Technical Document; ACOE = Army Corps of Engineers.
2. Mitigation Measure numbering in this column reflects the numbering utilized in the Expansion EIR (1998) MMP. In some cases, the numbering of Mitigation Measures has been changed to reflect the completion of mitigation requirements and/or to omit mitigation measures that no longer apply.

1.0 Introduction

1.1 Document Purpose and Legal Authority

1.1.1 Document Purpose

This document is a SEIR prepared pursuant to the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code §21000, et seq.) and the State CEQA Guidelines (California Code of Regulations §15000, et seq.) for the purpose of disclosing the potential for significant environmental impacts to occur as a result of the proposed project to revise the El Sobrante Landfill SWFP, pursuant to the Second Amendment to the Second El Sobrante Landfill Agreement (herein, Second Amendment). The SEIR also serves to identify mitigation measures for reducing, minimizing or avoiding any potential significant impacts associated with the proposed project.

The purpose of an Environmental Impact Report (EIR) is to provide unbiased and objective information to decision makers, such as Lead Agencies and Responsible Agencies, on the environmental effects of a given project and to assist them in their decision-making process. According to the CEQA Guidelines, a Lead Agency is the public agency responsible for approving or denying a project. A Responsible Agency is another public agency, other than the Lead Agency, with some discretionary approval over the project. For the proposed Project, the Lead Agency is the County of Riverside, or otherwise "the County."

A previous EIR for the El Sobrante Landfill was certified by the Riverside County Board of Supervisors on September 1, 1998 (SCH No. 1990020076). This EIR, which was prepared to address the El Sobrante Landfill Expansion Project contemplated in the Second El Sobrante Landfill Agreement (herein, Expansion Project), found that the Expansion Project would cause significant effects to geology, soils and seismicity; water resources; biological resources; land use and land use plans; traffic and circulation; air quality; noise; aesthetics; cultural resources; paleontological resources; and public services and utilities. The EIR for the Expansion Project (herein, Expansion EIR) determined that these impacts would be reduced to below a level of significance with implementation of mitigation measures identified in the Expansion EIR.

The proposal to revise the existing SWFP (herein referred to as the "Project") involves operational and administrative changes including the following:

- An extension of hours at the gate to allow for waste disposal activities to occur over a continuous 24-hour period. The landfill is currently permitted to be open 24 hours a day for ancillary landfill activities, but acceptance of waste for disposal is limited to 20 hours a day, from 4:00 AM to 12:00 Midnight. The Project would increase landfill hours to accept waste for disposal by four (4) hours. Permitted days of operation would remain Sunday through Saturday, seven (7) days per week, except for County landfill holidays.

- A change in the maximum disposal tonnage limits from a daily limit to a weekly limit. The landfill is currently permitted to accept a maximum of 10,000 tpd, seven (7) days per week, or 70,000 tpw. Instead of a maximum daily limit, the proposed change would set a maximum weekly tonnage limit of 70,000 tpw.

A more detailed account of the existing SWFP is provided in Section 2.0, *Environmental Setting*, while Section 3.0, *Project Description*, provides additional detail about changes that would occur as a result of the Project.

The RCWMD, acting on behalf of the Lead Agency, has determined that there are changes proposed in the Project and/or in the circumstances under which the Project would be undertaken that could result in new significant environmental effects or impacts not previously disclosed or addressed in the Expansion EIR, triggering the need for a further EIR, pursuant to CEQA Guidelines §15162. The RCWMD has further determined that only minor revisions to the previous Expansion EIR are necessary to make the previous Expansion EIR adequately apply to the proposed Project in the changed situation. Accordingly, and pursuant to CEQA Guidelines §15163, the RCWMD has determined that a Supplement to an EIR or SEIR is required.

CEQA Guidelines §15126.2(a) requires that an EIR "*identify and focus on the significant environmental effects*" of the proposed project. "Effects" and "impacts" have the same meaning and are used interchangeably in this EIR. In the environmental analysis sections of this SEIR (Section 4.0), the existing site conditions are disclosed followed by an analysis of potential impacts that may result from implementation of the proposed Project. Where the analysis demonstrates that new or added environmental impacts of significance would or may (without undue speculation) occur, which were not previously addressed in the Expansion EIR, mitigation measures are recommended to reduce or avoid these new or added significant effects. Likewise, where the analysis demonstrates that no new or added environmental impacts of significance would or may occur, additional mitigation measures are not recommended.

1.1.2 Legal Authority

As Lead Agency, the County will consider the following issues regarding the proposed revisions to the El Sobrante Landfill SWFP: a) evaluation of the SEIR and previously-certified Expansion EIR to determine if the physical environmental impacts are adequately disclosed; b) assessment of the adequacy and feasibility of identified mitigation measures and the potential addition, modification to, or deletion of mitigation measures, standard conditions, or project design features; and c) consideration of alternatives to the project that would reduce or eliminate significant environmental effects of the project.

Pursuant to State CEQA Guidelines §15040 through §15043, upon completion of the CEQA review process, the County has the legal authority to take the following actions:

a. Approve the proposed project;
b. Require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment;
c. Disapprove the project if necessary in order to avoid one or more significant effects on the environment that would occur if the project were approved as proposed; and,
d. Approve the project even though the project would cause a significant effect on the environment if the agency (i.e., Riverside County) makes a fully informed and publicly disclosed decision that i) there is no feasible way to lessen the effect or avoid the significant effect; and ii) specifically identifies expected benefits from the project that outweigh the policy of reducing or avoiding significant environmental impacts of the project.

1.2 Trustee and Responsible Agencies

State law requires that all EIRs be reviewed by trustee and responsible agencies. A Trustee Agency is defined in §15386 of the State CEQA Guidelines as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California." §15381 of the State CEQA Guidelines provides that, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project."

For the El Sobrante Landfill Project, the Riverside County Department of Environmental Health, Solid Waste Management LEA and the CIWMB have been identified as Responsible Agencies. The LEA will be responsible for issuance of the revised SWFP, once the CIWMB has reviewed and concurred. No Trustee Agencies have been identified for this Project.

1.3 Incorporation by Reference

State CEQA Guidelines §15150 allows for an EIR to "…incorporate by reference all or portions of another document…Incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand." Several documents have been completed for the Project site, including the El Sobrante Landfill Expansion EIR (State Clearinghouse No. 1990020076), which includes a Draft EIR (1994), Final EIR (1996), and an Update to the Final EIR (1998). The El Sobrante Landfill Expansion EIR (1998) is herein incorporated by reference and is available for review at the Riverside County Waste Management Department, 14310 Frederick Street, Moreno Valley, CA 92553. In addition, the Second El Sobrante Landfill Agreement (1998), the First and Second Amendments to the Second El Sobrante Landfill Agreement (2003 and 2007, respectively), and the Solid Waste Facility Permit for the El Sobrante Landfill are herein incorporated by reference and are available for review at the Riverside County Waste Management, at the above-listed address.

Another document, entitled, "Joint Technical Document, El Sobrante Landfill Expansion, Riverside, CA" (revised December 2004), was prepared to satisfy the Report of Waste Discharge Requirements (ROWD) found in California Code of Regulations (CCR), Title 27, §21585 and the Report of Disposal Site Information requirements found in CCR Title 27, §21600. This document is herein incorporated by reference, and is available for review at the Riverside County Department of Environmental Health, Local Enforcement Agency, located at 4080 Lemon Street, Riverside, CA 92501.

Table 1-1, *Pertinent and Related Documents*, provides a summary of the existing and related documents pertaining to the proposed Project.

Table 1-1 Pertinent And Related Documents

Document Type	Date	Description
Draft EIR for the El Sobrante Landfill Expansion Project	June 1994	CEQA compliance documentation to add 1,144 acres to the landfill site, for a total of 1,322 acres; to expand the overall waste disposal capacity of the landfill from approximately eight (8) million tons to approximately 108 million tons, or 196.11 million cubic yards; to increase acceptable daily tonnage from 4,000 to 10,000 tpd, and to permit waste disposal operations from 4:00 AM to 12:00 Midnight, seven (7) days per week, with the exception of holidays designated by the County.
Final EIR for the El Sobrante Landfill Expansion Project	April 1996	
Update to Final EIR for the El Sobrante Landfill Expansion Project	September 1, 1998	
Second El Sobrante Landfill Agreement	September 1, 1998	Public-private agreement between County of Riverside and USA Waste of California, Inc., for the expansion (as described above) and operation of the El Sobrante Landfill. The Second Agreement superseded the original agreement and the six (6) subsequent amendments thereto.
First Amendment to Second El Sobrante Landfill Agreement	June 20, 2003	Permits the construction and operation of a landfill gas to energy facility and a yard trimmings chipping, grinding and processing facility at the landfill.
RCIP General Plan Amendment No. 618	October 7, 2003	2002 Riverside County Integrated Project (RCIP) General Plan update.
EIR No. 441 for GPA No. 618	October 7, 2003	Program EIR for the RCIP General Plan Amendment No. 618.
Joint Technical Document, El Sobrante Landfill Expansion, Riverside, CA	December 2004	Provides operational characteristics at the landfill in conformance with the ROWD found in CCR, Title 27, §21585, and the Report of Disposal Site Information requirements found in CCR Title 27, §21600.
NOP and Initial Study for SWFP Revision	August 9, 2007	Preliminary assessment of potentially significant impacts related to proposed changes to the El Sobrante Landfill SWFP, and Notice of Preparation to responsible and trustee agencies, and other federal, state and local agencies potentially affected by the proposed Project.
Second Amendment to Second El Sobrante Landfill Agreement	March 12, 2007	Allows for USA Waste to seek regulatory approvals for proposed operational changes, sets disposal rates, requires the diversion of some County Waste from the landfill into a County owned or operated landfill, and increases the aggregate capacity reserved for County waste at the landfill.

1.4 Scope and Content

1.4.1 Scope

A NOP for a SEIR, including a description of potential adverse impacts of the proposed Project in the form of an IS, was distributed to the State Clearinghouse, responsible agencies and other interested parties on August 9, 2007. The objective of distributing the NOP and IS was to solicit input from the various agencies and to determine the full range and scope of environmental issues of concern so that these issues could be fully examined in this EIR. Both written and verbal comments received by the County during the NOP process are addressed in this SEIR. The NOP/EA distribution list and written comments received by the County are contained in Technical Appendix A. Issues raised in response to the NOP are listed below in Table 1-2, *Areas of Known Concern and Issues to be Resolved*.

Pursuant to CEQA, additional environmental review shall be conducted to determine potential environmental impacts resulting from subsequent discretionary actions, such as future expansion, agreements and/or further amendments to the El Sobrante Landfill SWFP.

Table 1-2 Areas of Concern and Issues to be Resolved

a.	Potential traffic related impacts due to re-distribution of existing traffic patterns and associated with extending the hours the facility is permitted to accept material.
b.	Potential violation of existing or future air quality standards associated with a 24 hour operation and use of additional on-site equipment.
c.	Potential air quality impacts associated with the exposure of sensitive receptors to air pollutants associated with extended operating hours.
d.	Potential air quality impacts associated with GHG emissions at the Project level.
e.	Potential air quality and safety impacts associated with additional hours of heavy equipment usage to accommodate the processing of anticipated daily tonnage.
f.	Potential safety impacts to workers due to extended nighttime operations.
g.	Potential noise impacts resulting from higher traffic volumes and extended operating hours of heavy equipment.
h.	Potential aesthetic impacts due to an increase in glare coming both from the landfill site and from waste hauling vehicles.

1.4.2 Format and Content

Pursuant to §15122 of the State CEQA Guidelines, an EIR must contain "…*at least a table of contents or an index to assist readers in finding the analysis of different subjects and issues*." Table 1-3, *Index of SEIR Sections*, provides the description and location of the various sections contained in this EIR.

Table 1-3 Index of SEIR Sections

Section	Description
Section 1.0, Introduction	Includes a brief summary of the Project, accompanying environmental documentation and regulatory requirements for compliance with CEQA.
Section 2.0, Environmental Setting	Describes the baseline physical conditions by which the County will determine if an impact is significant. Descriptions of the existing on-site conditions and surrounding land uses and development also are included.
Section 3.0, Project Description	Includes a discussion of the project objectives and provides baseline information which is relied upon by all technical reports and reviewing agencies.
Section 4.0, Environmental Analysis	Provides an analysis of potential direct, indirect, and cumulative impacts that may occur with implementation of the proposed project. Land use appropriateness, General Plan and land use consistency, and Community Plan consistency are also discussed.
Section 5.0, Mandatory CEQA Topics	Includes issue areas determined not to be significant in the project's Initial Study, unavoidable impacts and significant irreversible impacts that would occur as a result of project implementation.
Section 6.0, Alternatives to the Proposed Project	Provides a reasonable range of feasible alternatives to the project that could meet most of the basic project objectives and would avoid or substantially lessen any significant environmental impacts proposed by the project.
Section 7.0, References	Provides a list of persons involved in the preparation of the EIR, documents and websites consulted, and a list of appendices.

Several technical studies, reports, and supporting documentation, which were used in preparing this SEIR, are bound separately as Technical Appendices and are available for review at the Riverside County Waste Management Department, 14310 Frederick St. Moreno Valley, CA. These Appendices include a Traffic Impact Analysis, Air Quality Impact Report, and a Noise Analysis. The title of each Technical Appendix is listed in the Table of Contents to this SEIR.

This SEIR references other non-project specific technical studies, analyses and reports that have been incorporated by reference. Referenced, non-project specific documents are identified in the appropriate section(s) of this document. The relationship between the incorporated part of the referenced document and this SEIR is also described. In addition to those persons consulted, other documents and reference sources used during the preparation of this SEIR are identified in Section 8.0, *References*.

CEQA requires that an EIR contains, at a minimum, certain specified contents. Table 1-4, *Location of CEQA Required Topics*, below provides a quick reference in locating the CEQA required sections within this document.

Table 1-4 Location of CEQA Required Topics

CEQA Required Topic	Applicable CEQA Guideline(s)	SEIR Location
Table of Contents	§15122	Table of Contents
Summary	§15123	Executive Summary
Areas of Known Concern	§15123(b)(2)	Executive Summary; Table 1-2
Issues to be Resolved	§15123(b)(3)	Executive Summary; Table 1-2
Project Description	§15124	Section 2.0
Environmental Setting	§15125	Section 3.0
Significant Environmental Effects	§15126(a), 15126.2(a)	Executive Summary; Section 4.0
Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented	15126(b); 15126.2(b)	Section 5.2
Significant Irreversible Environmental Changes Which Would be Involved in the Proposed Project Should it be Implemented	§15126(c); 15126.2(c)	Section 5.4
Growth Inducing Impacts	§15126(d); 15126.2(d)	Section 5.3
Mitigation Measures Proposed to Reduce the Significant Environmental Effects	§15126(e), 15126.4	Executive Summary; Section 4.0
Project Alternatives	§15126(f), §15126.6	Section 6.0
Effects Found Not to be Significant	§15128	Section 5.1
Organizations and Persons Consulted	§15129	Section 7.0
Discussion of Cumulative Impacts	§15130	Section 4.0
Citations/References/Project Correspondence	§15148	Section 7.0; Technical Appendices

1.5 Summary of Proposed Project Actions

RCWMD, acting on behalf of the County as Lead Agency, has prepared this SEIR. This document will be used by the following public agencies in connection with the following decisions:

- **Riverside County Board of Supervisors**

  a. Certify the SEIR, adopt the appropriate findings pursuant to CEQA Guidelines §15091, adopt, as necessary, an appropriate statement of overriding considerations, and adopt the MMP for the Project as required by Public Resources Code §21081.6.

- **California Integrated Waste Management Board**

  a. Following certification of the SEIR by Riverside County, the CIWMB will be responsible for concurring with the issuance of the SWFP by the LEA. Specifically, the CIWMB must review the proposed Project for compliance with §§18105.1 and 18105.2(g) of Title 14 CCR, Division 7, Chapter 5, Article 3.

- **Local Solid Waste Management Enforcement Agency**

  a. The LEA will be responsible for the issuance of the revised SWFP, once the CIWMB has issued a letter notifying the LEA that it concurs with the issuance of the permit revisions.

2.0 Environmental Setting

2.1 Regional Location and Setting

2.1.1 Regional Location

The Project site is located within an unincorporated portion of western Riverside County, California, east of the Temescal Valley, between Olsen Canyon and Dawson Canyon. Nearby cities include the City of Corona, which lies approximately two (2) miles to the northwest, and the City of Lake Elsinore, approximately 13 miles to the southwest. The Project site's location within western Riverside County is shown on Figure 2-1, *Regional Location Map*, and Figure 2-2, *Vicinity Map*.

The 1,322-acre Project site is located in portions of Sections 23, 24, 25, and 26, Township 4 South, Range 6 West and within portions of Section 18, Township 4 South, Range 5 West. Regional access to the site is provided via I-15 located just west of the Project site. Direct access to the site is provided by Temescal Canyon Road and Dawson Canyon Road, a private landfill access road.

2.1.2 Regional Setting

Riverside County is located in an urbanizing area referred to as the Inland Empire. Southern California's Inland Empire is a 28,000-square mile region, comprising San Bernardino County, Riverside County, and the eastern tip of Los Angeles County, and is a fast-growing metropolitan area with large amounts of available land for future growth.

In addition to abutting Los Angeles County to the north and San Bernardino County to the northeast, western Riverside County also abuts Orange County to the west and San Diego County to the south. These adjacent counties have large employment bases, and, given Riverside County's relatively close proximity to these adjacent counties, many Riverside County residents commute to jobs in adjacent counties. Year 2000 Census data reported the population of Riverside County as approximately 1.5 million persons. The Southern California Association of Governments' (SCAG) forecast models predict that the population of Riverside County will almost double to approximately 2.8 million persons by year 2025 (County General Plan EIR Table 5.D).

As a result of population growth and the availability of jobs in adjacent counties, I-15 and Interstate 215 (I-215) have become major vehicular travel routes between Riverside and San Diego and Orange Counties. The proposed Project site is located just east of I-15 and approximately 19 miles west of I-215. The Project site's relationship to regional aspects of traffic, air quality, visual quality, public health and safety, and noise, are identified in Section 4.0, *Environmental Analysis*, of this EIR.

The Project site is also partially within the Lake Matthews/Woodcrest and Temescal Canyon Area Plans. Specifically, the site is located in the Gavilan Hills area, within the foothills east of the Temescal Valley between Olsen and Dawson Canyons. The area historically has been moderately rural in character with open space, mining, manufacturing and residential constituting the majority of land uses.

Figure 2-1 Regional Location Map

Figure 2-2 Vicinity Map

2.2 Surrounding Land Uses and Development

Lake Mathews, a 2,800-acre fresh water reservoir, lies approximately (2) two miles northeast of the Project site, near the City of Corona. Open space is the most common land use within 1,000 feet of the landfill site. The 162.4-acre Synagro RCF occurs west and adjacent to the Project site, which is permitted to process up to 500 pounds of biosolids per day. Light industrial/manufacturing occurs to the south and west, several mining operations (primarily clay and aggregates) occur to the southwest, pockets of residential land uses occur throughout Dawson Canyon to the southeast, and open space-conservation habitat blankets the eastern and northern boundaries of the landfill. Figure 2-3, *Surrounding Land Uses and Development*, depicts the Project site in relation to surrounding land uses and development.

2.3 Site Conditions

2.3.1 Topography

The topography of the El Sobrante Landfill area varies from gently to steeply sloping hills, knolls and ridges to flat mesas, as shown on Figure 2-4, *Site Topography*, and Figure 2-5, *Aerial Photograph*. Elevations on-site range from about 1,100 feet amsl near the southwest portion of the site, to about 1,400 feet amsl towards the central portions of the site. Natural slopes range from 1.5:1 (horizontal to vertical) to nearly flat, with most slopes less than 2:1. Most of the steeper slopes are predominately found in the eastern portions of the site. Topographic conditions are subject to change as waste is delivered, processed, compacted, and covered with earthen materials.

2.3.2 Geography

The Project site is located east of Temescal Canyon in the western portion of the Peninsular Ranges Physiographic Province of southern California. The site is of low-relief with evidence of some surface erosion and exposure of bedrock. It consists of a predominant geologic unit, the Jurassic Bedford Canyon Formation which is differentially weathered and fractured across the site. The Project is not located within an Alquist-Priolo Earthquake Fault Zone or an existing County Fault Hazard Zone, which means that no active faults have been mapped within 200 feet of the Project site.

2.3.3 Hydrology

The Project site lies within the greater Lake Mathews Hydrologic Area. Surface water originating from the site ultimately drains to either Dawson Canyon or Olsen Canyon, which are both tributaries to the northwest-trending Temescal Wash. Surface water also drains directly to Temescal Wash in the western portion of the site. Groundwater flow on the Project site occurs predominantly from the northeast to the south and southwest. No natural lakes or other bodies of standing water occur on the Project site.

2.3.4 Biological Resources

With respect to biological resources, the Project site supports various plant communities, comprising Riversidean sage scrub, annual grasslands, riparian/wetlands, cismontane juniper woodland and scrub, and alluvial fan scrub. The portions of the site supporting landfill operations and related activities are graded or disturbed. These areas consist primarily of flat-profile lands intermixed with

Figure 2-3 Surrounding Land Uses and Development

Figure 2-4 Site Topography

Figure 2-5 Aerial Photograph

moderate-depth drainages, characterized by annual grassland with some areas of Riversidian sage scrub. Drainages on the Project site generally are ephemeral and have little to no riparian vegetation. The remaining 677 acres of the site (approximately 52-percent of the total property) is designated by the El Sobrante MSHCP as undisturbed open space.

A total of 31 sensitive wildlife species occur or could potentially occur on the Project site. Species observed on-site include the coastal western whiptail, coastal California gnatcatcher, southern California rufous-crowned sparrow, loggerhead shrike, Stephen's Kangaroo Rat, and San Diego black-tailed jackrabbits. Most of the Project site is located within the west-central portion of the Lake Mathews Study Area for Stephen's Kangaroo Rat (SKR). In addition, the proposed Project is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) area.

2.4 Operational Characteristics

The El Sobrante Landfill is an existing Class III, nonhazardous MSW facility situated on 1,322-acres, of which 481 acres are permitted for landfill disposal operations. The landfill accepts waste from both Riverside County and out-of-County sources. It is privately-owned and operated by USA Waste of California, Inc., a subsidiary of Waste Management, Inc. (WMI). Non-waste operations, such as application of daily cover, stockpiling of daily cover, site maintenance, grading, and vehicle maintenance, are permitted to occur 24 hours per day, seven (7) days per week. MSW is allowed to be accepted for disposal on a daily basis between the hours of 4:00 AM and 12:00 Midnight. Operations are closed on certain County landfill holidays.

The El Sobrante Landfill operates under Solid Waste Facility Permit (SWFP) No. 33-AA-0217, last issued by the LEA on August 20, 2007, and its corresponding Joint Technical Document. Landfill operations are guided by the JTD, which supports regulatory permitting and approvals, and addresses applicable regulatory requirements for a landfill site. The JTD is prepared to satisfy the Report of Waste Discharge Requirements (WDR) found in California CCR, Title 27, Section 21585 and the Report of Disposal Site Information requirements found in CCR Title 27, Section 21600. The purpose of the JTD is to describe, in comprehensive detail, a landfill project including proposed design and operational features and procedures, and the proposed design for closure, as well as a description of post-closure maintenance activities.

The JTD for the El Sobrante Landfill Expansion was initially prepared in July of 2001 and revised in December 2004 and April 2007 to address changes in the landfill phasing, the operating day, the size of the landfill disposal footprint, and other operational changes, and to document the relocation of buildings, facilities, and operational yards. The final fill plan remained unchanged by the revised JTD. Primary operating permits and approvals for the landfill are provided in Table 2-1, *Operating Permits and Approvals*.

The El Sobrante Landfill operates in accordance with the project design features and specifications described in the JTD and as analyzed in the El Sobrante Landfill Expansion EIR (SCH No. 1990020076; July 1998). Landfill operations are also subject to the mitigation measures identified in the Expansion EIR's related MMP (August 1998). It is, however, the SWFP No. 33-AA-0217 that dictates the specific requirements for the landfill operations, incorporating the requirements of the 1998 MMP. As such, the El Sobrante Landfill currently operates under the SWFP restrictions specified in Table 2-2, *Existing Solid Waste Facility Permit Specifications*.

Table 2-1 Operating Permits and Approvals

Permit	Permitting Agency	Comments
Solid Waste Facility Permit (SWFP) #33-AA-0217	Riverside Department of Environmental Health (LEA)	Approved August 6, 2001, permit allows 10,000 tpd of waste to be disposed within 481 acres and a maximum of 1,305 daily vehicle trips.
Waste Discharge Requirements Order No. 01-53	Regional Water Quality Control Board -- Santa Ana Region	Approved July 21, 2001, order updates and replaces Order No. 85-131, as amended by Order No. 99-79, and those portions of WDR Order No. 98-99 that still apply to the landfill.
Rule 1150.1 Compliance Plan	South Coast Air Quality Management District (SCAQMD)	Measures to provide compliance with Rule 1150.1.
Rule 406, Fugitive Dust Emissions Control Plan	SCAQMD	Renewal to be submitted annually (Form 403 NC).
Rule 431.1 Exemption	SCAQMD	Exemption granted. Regulates sulfur content of gaseous fluids.
Title V Federal Operating Permit No. 113674	SCAQMD	Replaces all existing Permits to Operate and Permits to Construct that were issued by the SCAQMD.

Table 2-2 Existing Solid Waste Facility Permit Specifications

Category	Description
Permitted Hours of Operation	24 hours a day for non-waste operations (i.e., application of daily cover, stockpiling of daily cover, site maintenance, grading and vehicle maintenance) Monday through Sunday except certain County holidays. Waste is accepted between the hours of 4:00 a.m. and 12:00 a.m. Monday through Sunday. The application of daily cover may occur at any time during that period.
Permitted Tons per Day (tpd)	10,000 tons of Municipal Solid Waste[1]
Permitted Traffic Volume per Day	1,305 vehicles
Permitted Disposal Area	481 acres
Permitted Disposal Site Capacity	184.93 million yards[3]
Maximum Elevation	1832 ft.
Maximum Depth	170 ft.
Estimated Closure Date	2030[2]

1. Municipal solid wastes include agricultural wastes, animal wastes, construction demolition wastes, inert materials, dead animals, tires, egg washing wastes, urban wood wastes, white goods and large metallic materials (per County policy implementing State Public Resources Code Section No. 42170), Class III and inert wastes, Petroleum Contaminated Soils (as approved by the County Hazardous Materials Management Division and RWQCB), treated auto shredder fluff, and treated medical waste. The landfill is also allowed to accept certain Universal Wastes (i.e., treated wood wastes).
2. The landfill will continue to operate until it reaches design capacity. The closure date is an estimate only based on landfill design, compaction density, rate of disposal tonnage, etc.

The proposed post-closure land use of the project site is non-irrigated open space vegetated with native plant species to blend in with the surroundings. No construction improvements are proposed on the completed site.

2.4.1 Existing On-Site Improvements

Facilities at the entrance to the El Sobrante Landfill site consist of a security gate, queuing area, and up to four (4) scales. A vehicle pull out area is located adjacent to the scales for load and break inspections, as well as a driver rest area with restrooms and potable water. A total of four (4) pre-fabricated buildings exist at the El Sobrante Landfill site, including an administration building, office and laboratory buildings, all of which are located inside the entrance area. A paved 0.6-acre parking area, which provides 50 parking spaces for employees and visitors, is located adjacent to the entrance and the administration building. An area for maintenance of landfill equipment is located in the western portion of the site on approximately six (6) acres, and includes a vehicle maintenance building, truck wash, equipment storage yard and fueling station.

Existing on-site utilities include: water (potable and non-potable); electricity for lighting at the scales, maintenance and administrative buildings; landfill gas to energy facilities, including the landfill gas flare station; sewage and wastewater disposal for the showers, toilets and washdown facilities; and telephone services for the administration and maintenance buildings.

2.4.2 Existing Traffic, Tonnage Volumes, Staffing and Equipment

The El Sobrante Landfill currently is allowed to accept a maximum of 10,000 tons of waste per day. Based on data provided by the RCWMD, the busiest day at the landfill in 2007 occurred on October 23. A total of 141 personal vehicles, 252 commercial trucks, 442 transfer trailer trips, and two transfer rig trips were made to the site, with an estimated tonnage totaling 10,542 tons. While this slightly exceeded the maximum daily allowance of 10,000 tpd, the increase in tonnage observed was due to an "emergency situation" that resulted from an outbreak of wildfires within Riverside and San Diego Counties in October 2007, and under such emergency conditions the landfill is allowed to receive waste in excess of that allowed under normal daily operations by the SWFP. Table 2-3, *2007 Maximum Observed Daily Vehicle Trips and Tonnage Estimates*, provides a summary of the data collected, which represents a worst-case operating day at the landfill under existing conditions.

Table 2-3 2007 Maximum Observed Daily Vehicle Trips and Tonnage Estimates

Vehicle Type	Trips	Tonnage
Personal Vehicles	141	<1.05% of total
Commercial Trucks	252	1,260
Transfer Trailers	442	9,282
Transfer Rigs	2	<0.2% of total
TOTAL	**837**	**10,542**

Source: RCWMD

Note Personal Vehicles and Transfer Rigs account for roughly 1% of the total tonnage. Therefore, this tonnage is not included in the total tonnage estimation.

The landfill employs approximately 57 employees. Personnel responsibilities and duties include implementing general landfill operations, maintenance activities, environmental controls, records, emergencies, and health and safety procedures. Table 2-4, *Existing Daily Personnel*, provides an

estimate of the number of employees that currently operate and manage the El Sobrante Landfill on a daily basis pursuant to the existing approved SWFP. Additionally, the landfill currently operates approximately 40 pieces equipment, including landfill compactors, tractors, water trucks, off-road trucks, excavators, wheel loaders, graders, grinders, generators, and landfill tippers. Table 2-5, *Existing Landfill Equipment*, summarizes the number of vehicles and equipment necessary for processing waste per the current SWFP.

Table 2-4 Existing Daily Personnel

Job Title	Personnel Required (10,000 tpd)
Landfill Operations Management	8
Field and Maintenance Crew	36
Litter Maintenance	10
Environmental Technician	2
Energy Plant Operator	1
TOTAL	**57**

Source: USA Waste Services of California, Inc.

Table 2-5 Existing Landfill Equipment

Equipment Type	No. of Pieces
Waste Processing	
836 Compactor	4
Tractor (Cat D-9)	2
Tractor (Cat D-8)	3
Landfill Tipper	3
Water Truck	1
Soil Cover	
365 Excavator	1
Volvo A-40 ADT	3
Tractor (Cat D-6)	1
Motor Grader	1
Green Waste Processing	
644 Wheel Loader	1
Grinder	1
Volvo A-40 ADT	1
Misc. Tasks and Equipment	
Motor Grader	1
Light Plants (small generator)	13
Equipment Maintenance	
Mechanics Trucks	3
Fuel/Lube Trucks	1
TOTAL	**40**

Source: USA Waste Services of California, Inc.

2.5 Project History

A brief summary of environmental changes from 1984 leading up to this document is provided in the subsections below, and summarized chronologically in Table 2-6, *History of Project Changes*. All supporting environmental documentation referenced in the following sections will be made available for review by contacting the Planning Section of the Riverside County Waste Management Department (RCWMD) at (951) 486-3200 during the hours of 7:30 AM to 5:30 PM, Monday through Thursday, and 7:30 AM to 4:30 PM on Fridays.

2.5.1 Original Operating Agreement (1984-1986)

The landfill site was selected by the Riverside County Board of Supervisors (BOS) in 1984 to replace the Corona and Elsinore landfills, following a siting study and preparation of an EIR (SCH No. 198404110) that evaluated potential landfill locations that could serve western Riverside County.

Pursuant to the Original Operating Agreement, effective September 3, 1985, and the landfill's operating permit from the LEA, the El Sobrante Landfill site comprised 160 acres and accepted 1,000 tons per day (tpd) of waste. Hours of operation were Monday thru Saturday from 6:00 AM to 6:00 PM, with the exception of County holidays, and waste disposal was accepted from Riverside County municipalities only. Landfill operations began in 1986.

2.5.2 Early Modifications (1989-1994)

In October 1989, a Negative Declaration (SCH No. 1989061907) was approved to increase the acceptable daily tonnage from 1,000 to 2,000 tpd, followed by an SEIR (SCH No. 1991106014) in July 1991 to add an 18-acre parcel to the landfill site, thereby increasing the total size of the landfill from 160 to 178 acres. MSW disposal was permitted on approximately 90 of the 178 acres and the landfill employed approximately 17 full-time employees.

In August 1992, Western Waste Industries, former owner/operator, was authorized by the County BOS to import waste to the landfill site from areas outside Riverside County and in 1994, a Mitigated Negative Declaration (MND; SCH No. 1994106650) was processed to increase the acceptable daily tonnage from 2,000 to 4,000 tpd.

2.5.3 The Second Agreement (1998-2003)

In 1998, the BOS certified an EIR (SCH No. 1990020076) for the El Sobrante Landfill Expansion Project and approved the Second El Sobrante Landfill Agreement (Second Agreement), allowing USA Waste of California to solicit the permits necessary to expand the 178-acre landfill site by 1,144 acres to a total of 1,322 acres, to increase the overall waste disposal capacity of the landfill from approximately eight (8) million tons to approximately 108 million tons, or 196.11 million cubic yards, to increase the landfill disposal footprint to 495 acres, and to increase the total daily disposal capacity of the landfill from 4,000 to 10,000 tpd, with 4,000 tpd reserved for in-County waste and 6,000 tpd for out-of-County waste. The Second Agreement, along with the SWFP, which was issued in 2001, also increased the hours of operation for the landfill, allowing waste disposal operations from 4:00 AM to 12:00 Midnight, seven (7) days per week, with the exception of holidays designated by the County, with non-waste operations (i.e., application of daily cover, stockpiling of daily cover, site maintenance, grading, and vehicle maintenance) occurring 24-hours daily. Pursuant to the First Amendment to the Second Agreement, approved by the BOS on July 1, 2003, the El Sobrante

Table 2-6 History of Project Changes

Year Approved	SCH #	Project Description	CEQA Document
1984	1984041108	Landfill activities initiated at the 160-acre El Sobrante Landfill site, with a permitted daily capacity of 1,000 tpd of waste and an overall capacity of 6.2 million tons.	EIR
1989	1989061907	Increased the maximum daily tonnage from 1,000 to 2,000 tpd.	ND
1990	1990100074	Revised LEA permit for landfill operations.	Unk.
1991	1991106014	Added an additional 18-acre parcel to the landfill site, thereby increasing the size of the landfill to 178 acres.	SEIR
1992	--	Allowed import and acceptance of waste at the landfill site from areas outside Riverside County.	Exempt
1994	1994106650	Increased the maximum daily tonnage from 2,000 to 4,000 tpd.	MND
1998	1990020076	BOS adopted resolutions to approve landfill expansion project, to certify Expansion EIR, and to approve Second El Sobrante Landfill Agreement.	EIR
2001	1990020076	SWFP issued by LEA for landfill expansion project, adding 1,144 acres to the landfill site, for a total of 1,322 acres; expanding the overall waste disposal capacity of the landfill from approximately eight (8) million tons to approximately 108 million tons, or 196.11 million cubic yards; increasing maximum daily tonnage from 4,000 to 10,000 tpd, and permitting waste disposal operations from 4:00 AM to 12:00 Midnight, seven (7) days per week, with the exception of holidays designated by the County.	EIR
2001	2001128375	Conveyed approximately 282 acres of land to Riverside County for the protection of habitat as a condition of mitigation.	NOE
2002	2002078283	Conveyed approximately 406 acres of land through a Conservation Easement for the protection of habitat as a condition of mitigation.	NOE
2003	1990020076	Permitted to operate electrical generating equipment to convert landfill gas and to grind green waste on-site.	NOE
2003	1990020076	BOS approved proposed modification to the SWFP/JTD to identify an operating day for the landfill and to establish protocol for the application of daily cover and/or alternative daily cover.	Addendum to EIR
2004	1990020076	SWFP revision approved, changing the operating day to be 3:00 AM Monday to 8:00 PM Saturday (facility operates 24-hours continuously, Monday through Sunday).	Addendum to EIR
2007	2007088214	SWFP reissued to modify disposal footprint from 495 acres to 481 acres as a result of stability berm design and to limit green materials (processed and unprocessed) received at site to a maximum rate of 2,284 tpd or 14,788 tons per week (tpw).	NOE
2007	--	The El Sobrante Landfill JTD was amended to describe the following recycling activities: 1) Addition of a Recycle Reload area for the acceptance of recyclable materials from both residential curbside and commercial recycling programs; and 2) Diversion of select C&D loads for sorting and material recovery.	NOE

Landfill also was permitted to operate electrical generating equipment to convert landfill gas to energy and to grind green waste.

In 2001, approximately 282 acres of land was conveyed to Riverside County as part of a conservation easement to mitigate impacts to biological resources. Again in 2002, an additional 406 acres was placed in conservation to provide mitigation for impacts to biology. State Clearinghouse Numbers for these projects are No. 2001128375 and No. 2002078283, respectively. Additional technical information is provided in Section 2.6.3, *Existing Operating Agreement*.

2.5.4 Additional Project Changes

In 2007, a Notice of Exemption under CEQA (SCH No. 2007088214) was approved to clarify that the net disposal footprint was 481 acres due to stability berm design and to limit the amount of processed and unprocessed green materials received by the landfill to 2,284 tpd or 14,788 tpw.

2.6 Planning Context

2.6.1 Riverside County General Plan and Zoning

The County of Riverside's primary planning document is the County General Plan, adopted October 7, 2003. The General Plan, along with the Community and Environmental Transportation Acceptability Process (CETAP) and MSHCP, are part of the RCIP. The Project site is partially within both the Lake Mathews/Woodcrest and Temescal Canyon Area Plans, which designate the El Sobrante Landfill site as Public Facility (PF) and Open Space-Conservation Habitat (OS-CH) land uses. The majority of the site is zoned *Residential Agricultural -10 acre minimum (R-A-10)*, along with small portions zoned *Rural Residential (R-R)* and *Light Agriculture - one acre minimum (A-1-1)*. As a public project, the proposed Project is not subject to the provisions of the Riverside County Land Use and Zoning Ordinance No. 348 , pursuant to the provisions of Section 18.2.a.b.(1).

2.6.2 Circulation

Regional access to the Project site is provided via Interstate 15 and Temescal Canyon Road. Access to the El Sobrante Landfill site is provided by an existing 1.3-mile paved, private, two-lane access road extending from Temescal Canyon Road. The access road has a width of approximately 32-feet with an average grade of three (3) percent slope and a 46-foot wide bridge extending over the Temescal Wash. On-site roads are maintained as paved roads and are generally about 40-feet wide, with maximum grades reaching approximately eight (8) percent.

2.6.3 Existing Operating Agreement

Operations at the El Sobrante Landfill are governed by the Second El Sobrante Landfill Agreement (Second Agreement, which is a legal contract between the County and USA Waste of California, Inc. The Second Agreement, effective September 17, 1998 and valid until January 1, 2075, and any amendments thereto, supersedes all terms and conditions outlined in the Original El Sobrante Agreement (First Agreement), including the six (6) amendments and one (1) addendum to the First Agreement.

A. Procedural Operations

Pursuant to the Second Agreement, both County and non-County waste is accepted at the El Sobrante Landfill. The Second Agreement specifies that all non-County waste shall be delivered and accepted

in accordance with the California Integrated Waste Management Act of 1989 (AB 939 et seq.). Solid waste generated from within the County may be processed at the landfill through facilities approved in accordance with the Riverside Countywide Integrated Waste Management Plan (CIWMP). Also, the Riverside County Department of Environmental Health (RCDEH), which has been designated as the LEA pursuant to AB 939, has the authority to regulate all disposal, processing and/or transferring activities within the County. Changes that require additional CEQA analysis, such as revisions to the operating permit must first be approved by the BOS and then other responsible agencies.

B. Landfill Gas Conversion and Green Waste Processing

The First Amendment to the Second Agreement (herein "First Amendment") was authorized by the County BOS on July 1, 2003 to permit the landfill site to construct facilities to convert landfill gas into electricity and to provide a facility for chipping, grinding, sorting and processing of yard trimmings (i.e., grass, leaves, brush, etc.). Additionally, the First Amendment establishes that yard waste materials must be processed from USA Waste within the hours of 8:00 AM and 5:00 PM, Monday through Saturday.

Pursuant to the First Amendment, USA Waste committed to provide additional litter control services and to provide quarterly grading services at the following unimproved dirt roadway locations: (1) Park Canyon/Dawson Canyon Road; (2) Dawson Canyon Road; (3) Sunway Drive; and (4) Spanish Hills Drive.

C. Second Amendment

On March 13, 2007, the BOS approved the Second Amendment to the Second El Sobrante Landfill Agreement. It is the Second Amendment that provides for USA Waste to pursue the approvals and permits necessary to implement the proposed Project. It also allows County personnel to inspect and monitor load check activities at facilities owned by USA Waste, eliminates charges to the County for County waste deposited in the El Sobrante Landfill during community cleanups, and sets an interim rate that the County pays USA Waste for County waste deposited in the El Sobrante Landfill.

2.6.4 Other Applicable Policy Documents

A. Multiple Species Habitat Conservation Plan for the El Sobrante Landfill

In July 2001, USA Waste of California, Inc. (USA Waste) prepared a MSHCP for the El Sobrante Landfill. The El Sobrante MSHCP was prepared as part of the applications that USA Waste submitted to the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG) for permits authorizing incidental take of certain listed plant and animal species. Preparation of the El Sobrante MSHCP also was required pursuant to mitigation measures imposed on the landfill as part of the Expansion EIR.

The El Sobrante MSHCP serves as a comprehensive habitat conservation plan focusing on the conservation of species and their associated habitats that occur within lands owned and operated in conjunction with the El Sobrante Landfill. The Implementation Agreement (IA) for the El Sobrante MSHCP, under which a Section 10(a) Permit for Incidental Take from USFWS and a Section 2081(b) Permit to Take from CDFG were issued, was entered into by USFWS, CDFG, USA Waste, and the County in July 2001. The MSHCP covers the duration of waste management activities (including post-closure activities for the landfill) and continued management of conserved habitat

after USA Waste leaves the site. The resulting authorization for incidental take of covered species covers a period of 80 years.

The El Sobrante MSHCP encompasses approximately 1,322 acres, including 645 acres associated with landfill activities and an additional 677 acres of undisturbed open space which abut the landfill areas. The El Sobrante MSHCP provides take authority for incidental take of two species that are federally and/or state listed: the coastal California gnatcatcher and the Stephens' kangaroo rat. The El Sobrante MSHCP also provides take coverage for an additional 29 species to account for their potential future state or federal listing. In addition, the El Sobrante MSHCP is intended to provide for the restoration of Riversidean sage scrub (RSS) as a component of landfill closure, and to establish measures and components that constitute the multi-species restoration plan, the salvage-enhancement plan for many-stemmed dudleya, the implementation plan for habitat mitigation, the predator monitoring and control plan, and the gnatcatcher and cactus wren measures required pursuant to the Expansion EIR.

The El Sobrante MSHCP permits certain activities to occur on-site, including all waste management, activities associated with landfill operations, and the implementation of certain El Sobrante MSHCP conservation measures.

The Expansion EIR found that implementation of the El Sobrante MSHCP requirements, in conjunction with other specified measures contained in the Expansion EIR's MMP, would reduce impacts to biological resources to a level below significance.

B. Community and Environmental Transportation Acceptability Process (CETAP)

As part of the RCIP process, the County is considering adoption of the CETAP. CETAP identifies locations for major new multimodal transportation facilities to serve the current and future transportation needs of Western Riverside County. The Riverside County Transportation Commission (RCTC) is conducting various studies to determine the most appropriate location for each of these facilities. The corridors under examination would provide right-of-way for future multimodal transportation facilities. The proposed Project site is identified within the "preferred" alignment for the Mid-County Parkway (MCP), a proposed 32-mile transportation corridor proposed between the San Jacinto and Corona areas. The preferred alignment for this facility would traverse through the northeastern corner of the Project site, within areas that are proposed for permanent open space. There are no active landfill operations occurring within the preferred alignment for the MCP facility. An EIR/EIS for the Mid-County Parkway was released for public review in October 2008 (SCH #2004111103). Certification of an EIR for the MCP, along with the identification of a final alignment for the facility, is anticipated in the near future.

2.7 List of Past, Present, and Reasonably Anticipated Future Projects in the Project Area

The cumulative baseline for this Project includes existing land uses, projects presently under construction, and probable future projects that include approved projects, projects that have a pending application on-file, and future development as anticipated by Riverside County's General Plan and the long-range plans of adjacent jurisdictions. The specific projects evaluated in the cumulative impacts analysis, in addition to existing, developed projects and General Plan buildout, are identified in Table 2-7, *Past Present, and Future Projects*, and illustrated by Figure 2-6, *Location*

of Past, Present, and Future Projects. Other long-range planning documents were also reviewed for determining projects to be considered in the cumulative impacts analysis. These documents include Riverside County Area Plans and the General Plans of nearby jurisdictions such as the cities of Corona, Lake Elsinore, Norco and Riverside. Given the environmental issues to be evaluated in this SEIR, this study area was selected because it encompasses all areas that could potentially be significantly impacted by traffic, air quality, noise, and/or light and glare effects of the proposed Project.

Table 2-7 Past, Present, and Future Projects

Project	Location/Land Use	Land Use Intensity[1]
Regional Projects		
Riverside County General Plan	Unincorporated Riverside County	General Plan Buildout
City of Corona General Plan	City of Corona	General Plan Buildout
City of Norco General Plan	City of Norco	General Plan Buildout
City of Lake Elsinore General Plan	City of Lake Elsinore	General Plan Buildout
City of Riverside General Plan	City of Riverside	General Plan Buildout
Projects In The Immediate Vicinity		
Past Projects (Approved and fully-developed)		
Wildrose Specific Plan	Corona SOI/Residential	1,040 DU/552.7AC = 1.9 DU/AC
Spanish Hills	Corona SOI/ Residential	158.6AC
Horsethief Canyon Specific Plan	Unincorporated/Residential	1,900DU/547.8AC = 2.2DU/AC
Dawson Canyon	Unincorporated/ Residential	221.9AC
Synagro	Corona SOI/Industrial	162.3AC
Hydro Conduit	Corona SOI/Industrial `	61.5AC
Montecito Ranch	Corona SOI/Residential	304DU/125.4AC = 2.4 DU/AC
Mountain Cove	Corona SOI/Residential	518DU/823.2AC = 0.6 DU/AC
Painted Hills	Corona SOI/Residential	205DU/135.2AC = 1.5 DU/AC
Chandler Mines	Corona SOI/Mineral Extraction	325.7AC
Cemex Mines	Corona SOI/Mineral Extraction	230.0AC
Werner Mines	Corona SOI/Mineral Extraction	203.4AC
Present Projects (Under construction)		
The Retreat Specific Plan	Corona SOI/Residential	540 DU/1,037.2AC = 0.5 DU/AC
Sycamore Creek Specific Plan	Corona SOI/Residential	1,765DU/717.3AC = 2.5 DU/AC
Dos Lagos Specific Plan	Corona SOI/Residential & Mixed Use	590 AC
Future Projects (Pending approval from local jurisdiction)		
Elmore Properties	Unincorporated/Residential	134DU
Saddleback Estates	Unincorporated/Residential	285DU/144.2AC = 2.0DU/AC
Temescal Heights	Unincorporated/Residential	320DU/515.7AC = 0.6 DU/AC
Morger Property	Corona SOI/Unk.	384.9AC
Serrano Commerce Center	Corona SOI/Industrial/Commercial	489.3AC
Renaissance Ranch	Unincorporated/Residential	355DU/158.2AC = 2.2 DU/AC
Toscana	Corona SOI/Residential	1,443DU/955.3AC = 1.5 DU/AC
Twin Creeks Specific Plan	Corona SOI/Residential	2,000 DU/692.4 AC = 2.9 DU/AC

[1] DU = Dwelling Units; AC = Acres, SOI= Sphere of Influence, Unk.= Unknown

Figure 2-6 Location of Past, Present, and Future Projects

3.0 Project Description

In accordance with CEQA §15124(b), the following section includes a statement of Project objectives and a description of the Project's technical, economic and environmental characteristics. A more detailed account of the Project site's environmental setting, including its regional location, surrounding land uses, physical characteristics, and site conditions, is contained in Section 2.0 of this document. Overall, the Project proposes to revise the existing SWFP to allow for operational and administrative changes, which include extending the hours that waste is accepted into the site and changing the maximum tonnage capacity limit from a daily limit to a weekly limit. The Project will not increase the number of vehicle trips currently permitted, nor will it increase the maximum amount of waste allowed on a weekly basis.

3.1 Project Location

The Project site is located in the Temescal Canyon area of unincorporated western Riverside County, California. As shown on Figure 2-2, the site is located east of I-15 and Temescal Canyon Road, approximately two (2) miles southeast of the City of Corona. Direct access to the site is provided by Temescal Canyon Road and Dawson Canyon Road, a private landfill access road.

3.2 Statement of Objectives

The primary objective of the proposed Project is to execute revisions to the El Sobrante Landfill SWFP that will allow the landfill to achieve greater operating efficiencies. The following is a list of objectives sought by the proposed Project:

- Provide greater flexibility in landfill operations to meet the disposal needs of the regional solid waste system;
- Improve solid waste management services to southern California customers;
- Increase operational efficiencies in anticipation of meeting future waste disposal needs of both western Riverside County and other non-County users; and,
- Reduce the current and future amount of daily peak hour vehicle trips associated with the Project site.

3.3 Project Characteristics

This SEIR analyzes potential environmental effects associated with the proposed revisions to the El Sobrante Landfill SWFP, which would enable USA Waste of California to seek approvals and/or permits to allow for changes to the landfill's operations. Specifically, the Project proposes the following modifications to the existing SWFP:

- Extend the number of hours waste can be accepted by four (4) hours to include the hours of 12:00 Midnight to 4:00 AM, thereby allowing acceptance of waste material over a continuous 24-hour period;

- Change the maximum tonnage limit of 10,000 tpd, 7 days a week, to a weekly tonnage limit of 70,000 tpw. No increase in the amount of waste allowed on a weekly basis is proposed;

- Maintain the permitted days of operation of Sunday through Saturday, seven (7) days a week, 360 days per year; and

- Maintain the daily maximum vehicle trips count of 1,305 as specified under the existing SWFP.

3.3.1 Operations

Although the Project proposes to extend the allowable hours for waste delivery from 20 hours to 24 hours per day, the facility currently operates 24 hours per day to allow for unrestricted application of daily cover, stockpiling of daily cover, grading, vehicle maintenance, and other maintenance activities. The landfill site utilizes lighting to ensure the safety of its maintenance personnel assigned to the working face of the landfill during dark hours. Lighting on-site during the night-time and early morning hours would be unaffected by the proposed increase in waste delivery hours. Similarly, waste processing operations (i.e., application of daily cover, stockpiling of daily cover, site maintenance, grading, and vehicle maintenance) would continue to occur over a continual 24-hour period.

Existing traffic associated with daily landfill operations consists of waste transfer trucks, packer trucks, delivery trucks, and private vehicles. With approval of the proposed Project, the maximum number of daily vehicles allowed at the landfill would remain at 1,305 vehicular trips, as is currently allowed under the existing SWFP. However, with the proposed revision to allow for waste delivery between the hours of 12:00 Midnight and 4:00 AM, these 1,305 trips would be distributed over a longer period of time to reduce peak traffic. Additionally, there would be no change to the existing SWFP requirement that all waste trucks, except for waste trucks servicing local residential communities, must exclusively utilize the Temescal Canyon Road interchange at I-15 for access to and from the landfill site.

In order to accommodate the proposed Project, an increase of eight (8) employees is anticipated, while the change in the number of equipment pieces is expected to be minimal and would not result in any net change. Table 3-1, *Proposed Daily Personnel*, summarizes the increase in the number and type of employees needed in support of the proposed Project. The area requiring the greatest labor increase is for field and maintenance workers. Table 3-2, *Proposed Daily Peak Landfill Equipment Operation*, depicts the change in the type and number of equipment needed for future waste processing volumes. Waste processing equipment would be reduced under the proposed Project. Although there is the potential that daily tonnage would increase with implementation of the Project, waste deliveries would be spread out over a greater period of time than under existing conditions (*i.e.*, 24 hours); therefore, there will be less waste processing equipment operating at any given time. While the Project would increase the number of artificial light sources on-site during the additional four-hour period that the landfill is open for waste delivery to ensure public health and safety, artificial lighting is already utilized at the site during these hours. As shown in Table 3-2, there would be no net change in equipment at the landfill site (see Section 2.0, *Environmental Setting*, for a breakdown of existing employee and equipment amounts).

Table 3-1 Proposed Daily Personnel

Job Title	Existing Personnel	Proposed Personnel	Increase From Existing Conditions
Landfill Operations Management	8	9	1
Field and Maintenance Crew	36	43	7
Litter Maintenance	10	10	0
Environmental Technician	2	2	0
Energy Plant Operator	1	1	0
TOTAL	**57**	**65**	**8**

Table 3-2 Proposed Daily Peak Landfill Equipment Operation

Equipment Type	Existing Quantity	Proposed Quantity	Change from Existing Conditions
Waste Processing			
836 Compactor	4	3	-1
Tractor (Cat D-9)	2	1	-1
Tractor (Cat D-8)	3	1	-2
Landfill Tipper	3	3	0
Water Truck	1	1	0
Soil Cover			
365 Excavator	1	1	0
Volvo A-40 ADT	3	4	+1
Tractor (Cat D-6)	1	1	0
Motor Grader	1	1	0
Green Waste Processing			
644 Wheel Loader	1	1	0
Grinder	1	1	0
Volvo A-40 ADT	1	1	0
Misc. Tasks and Equipment			
Motor Grader	1	1	0
Light Plants (small generator)	13	16	+3
Equipment Maintenance			
Mechanics Trucks	3	3	0
Fuel/Lube Trucks	1	1	0
TOTAL	**40**	**40**	**0**

Source: WMI, Damon Defrates, February 2008

3.3.2 Environment

The proposed Project does not include any components that would preclude implementation of measures intended to reduce the environmental effects associated with the landfill. The proposed Project does not propose a change to the permitted area for landfill operations, the landfill disposal footprint, or the elevation of the landfill, and therefore, no new or additional disturbance of existing natural resources would occur. The proposed Project does, however, increase motor vehicle and truck activity during the early morning hours between midnight and 4:00 AM, which corresponds to when wildlife activity is high. Because the landfill operates on a continuous 24-hour basis, it is reasoned that over time, wildlife has learned to avoid using the primary truck routes leading to/from the site. Therefore, no substantial changes to impacts identified for biological resources in previous environmental analyses are identified for the proposed Project. The proposed Project would continue to be implemented pursuant to the Expansion EIR and the Expanion EIR MMP).

3.4 Subsequent Discretionary Actions

Concurrent to the certification of this SEIR by the Riverside County Board of Supervisors, the Project proponent would file applications for a revised SWFP with the LEA. As part of the application process, the LEA would issue a draft SWFP to the CIWMB requesting concurrence or rejection of the proposed SWFP revisions. Upon concurrence from the CIWMB, LEA would be authorized to issue the revised SWFP. Because the fundamental operational characteristics of the landfill are not proposed for change (i.e., no new areas are proposed for waste disposal, and there would be no net increase in weekly traffic or tonnage), the proposed permit modification would not result in the need for subsequent discretionary actions beyond what is described in this SEIR.

3.5 Intended Uses of the EIR

This SEIR serves to inform the various governing agencies with regulatory oversight of the El Sobrante Landfill operations of the environmental impacts associated with increasing the number of hours waste is accepted at the site and with changing the daily capacity limit to a weekly capacity limit. The types of actions that these agencies may take in connection with this SEIR include, but are not limited to the following:

- Approving/Disapproving, adopting or amending applicable plans, policies or programs;
- Making findings;
- Approving and issuing permits;
- Approving agreements;
- Providing public services.

Table 3-3, *Agency Approvals and Reviews*, summarizes the agency approvals required to implement the proposed Project.

For a more detailed account of the agencies expected to use this EIR and the existing related permits and other requirements which regulate operation of the El Sobrante Landfill, see Table 2-1, *Operating Permits and Approvals*, contained in Section 2.0, *Environmental Setting*.

Table 3-3 Agency Approvals and Reviews

Agency	Permit or Approval
Riverside County Board of Supervisors	• Review SEIR for adequacy and consistency with CEQA • Certify the SEIR • Adopt the appropriate findings pursuant to CEQA Guidelines §15091 • Adopt, as necessary, an appropriate statement of overriding considerations • Adopt the MMP • File and post Notice of Determination
Local Solid Waste Management Enforcement Agency (LEA)	• Confirm findings of conformance with the California Integrated Waste Management Plan • Issue revised SWFP upon concurrence from the CIWMB
California Integrated Waste Management Board (CIWMB)	• Approve/Disapprove issuance of the proposed SWFP by the LEA

4.0 Environmental Analysis

In accordance with CEQA Guidelines §15126 and §15126.2(a), this Section provides analyses of potential direct and indirect environmental impacts that could occur from implementation of the proposed Project.

A description of the existing physical conditions as they existed at the time this SEIR's NOP was distributed for public review is provided in each subsection. The description of existing conditions is followed by a summary of applicable federal, state and local regulations and policies applicable to the subject area. The environmental analysis focuses on the "changes in the environment that would result from the development Project" while also "examin(ing) all phases of the Project including planning, construction, and operation" (CEQA Guidelines §15161). The physical environmental changes identified are referred to as "effects" or "impacts." Thresholds of significance and mitigation measures also are found in this Section. Lastly, in compliance with CEQA Guidelines (§15130 *et al.*), this section of the EIR includes a discussion of the potential cumulative impacts.

The environmental subject areas evaluated in this Section include:

4.1 Aesthetics
4.2 Air Quality
4.3 Noise
4.4 Public Health and Safety
4.5 Transportation and Circulation

4.1 Aesthetics

The following discussion is based on the existing conditions and improvements at the El Sobrante Landfill site and a viewshed analysis prepared by T&B Planning to evaluate potential impacts to aesthetics as a result of the proposed Project. It should be noted that mitigation measures identified in the Expansion EIR and MMP pertaining to aesthetics and visual quality would continue to be enforced upon implementation of the proposed Project (as indicated in SEIR Table S-1).

4.1.1 Existing Conditions

4.1.1.1 On-Site Conditions

The proposed Project site encompasses approximately 1,322 acres in unincorporated western Riverside County. The Project site is located east of I-15, in the upper elevations of the foothills east of Temescal Valley between Olsen Canyon and Dawson Canyon. The site is characterized by gently to steeply sloping hills, as well as knolls, ridges and mesas. Elevations on-site range from approximately 1,100 feet amsl near the southwest portion of the Project site, to about 1,500 feet amsl at the center of the site; however, topographic conditions on-site are subject to change as waste is delivered, processed, compacted and covered with earthen materials.

Of the 1,322 acres, 645 acres constitute the active landfill area, which is primarily located in the western portion of the property. The landfill disposal footprint area accounts for 481 acres of this area. Other facilities on-site are generally clustered at the entrance to the El Sobrante Landfill, and include: a security gate, a vehicle queuing area, four (4) scales, three single-story pre-fabricated buildings, a rest area, and a paved parking area. In addition, a landfill gas-to-energy facility/flare station (consisting of three generators and supporting equipment) is located adjacent to the landfill entrance. A maintenance area is located approximately one-half mile northeast of the entrance, and consists of a vehicle maintenance building, truck wash, equipment storage yard, and a fueling station. A paved, two-lane access road (Dawson Canyon Road) enters the Project site from the southwest and travels north to the El Sobrante Landfill entrance. A series of dirt roads traverse the landfill site providing access to the various activity areas. The remaining 677 acres in the northern, eastern, and southern portions of the Project site are managed as natural open space conservation lands and are characterized by gently to steeply sloping hillsides and native vegetation.

A. Operational Characteristics

- **Artificial Lighting**

The El Sobrante Landfill utilizes artificial light sources to facilitate operations during non-daylight hours. As described in Section 2.4, *Operational Characteristics*, waste processing and site maintenance activities occur 24 hours per day, seven days per week, with waste delivery permitted to occur on a daily basis from 4:00 AM to 12:00 Midnight. Artificial lighting associated with the El Sobrante Landfill is produced from two sources: on-site operational lighting for landfill activities (*e.g.*, application of daily cover materials, site maintenance, grading, vehicle maintenance, etc.), and vehicle headlights associated with vehicles traveling to and from the site between the hours of 4:00 AM and 12:00 Midnight. On-site artificial lighting sources, which are utilized throughout the nightly operations, even during hours when waste is not accepted at the landfill, are typically stationary and located at the scales, maintenance facility, administration building, gas-to-energy facility/flare station, and crew quarters. Portable lights are used at the working face of the landfill. Vehicle headlights represent a mobile source of artificial lighting, which is concentrated along the landfill's

north-south access road (via Dawson Canyon Road). The access road begins at Temescal Canyon Road and stretches northeast for approximately one mile.

Previous environmental analyses conducted for the El Sobrante Landfill identified artificial lighting as a potential cause of significant visual quality impacts to surrounding residential areas. To minimize potential adverse impacts associated with light pollution (*i.e.*, sky glow, light trespass, and glare), the El Sobrante Landfill has installed outdoor lighting that is downward facing and shielded, in accordance Mitigation Measure A-5, as required by the MMP. Earthen berms have also been constructed when feasible to provide a visual buffer and preclude significant visual quality impacts associated with light pollution (per Mitigation Measure A-6 from the MMP). In addition, the landfill facility has been phased in such a manner so as to reduce the visual prominence of the facility over time. Specifically, the portions of the landfill with greatest visibility to surrounding off-site areas are targeted for earlier phases of the landfill's operation. Once these areas are filled, they would be closed and revegetated. Subsequent phase of landfill operation would then occur interior to the site, in areas that are not visible from off-site locations. These phasing design considerations, in conjunction with continued enforcement of Mitigation Measures A-5 and A-6, will continue to ensure that lighting effects associated with landfill operations remain below a level of significance.

❑ Litter Removal

The El Sobrante Landfill is responsible for the control and cleanup of litter and debris from the landfill and waste-hauling vehicles that travel along Dawson Canyon Road, per Mitigation Measure A-7 from the MMP. The control and cleanup of litter precludes a significant adverse effect to local visual quality. Litter removal activities are an on-going requirement of the El Sobrante Landfill; thus, Mitigation Measure A-7 would continue to be enforced for subsequent modifications to the landfill (including the proposed Project).

❑ Facilities and Improvements

Facilities and improvements on-site (including signage) have been constructed using colors that are compatible with the surrounding landscape in order to minimize potential impacts to local visual character. In addition, non-reflective building materials have been used on-site to minimize glare. As required by Mitigation Measure A-3 from the MMP, future development on-site would be required to incorporate a color palette that is consistent with the surrounding areas, as well as building materials that produce a minimum amount of glare.

❑ Landfill Restoration

The El Sobrante Landfill has prepared a plan to guide the closure and restoration of the landfill site. The restoration plan includes the restoration of areas disturbed by landfill operations with native plant species. Upon completion of the restoration plan, potential impacts associated with the long-term visual quality of the site would be precluded. The restoration plan is phased and will be implemented as individual phases of the landfill reach their respective disposal capacities. Construction on the first phase of closure and restoration began in 2006. The restoration plan was developed in accordance with the requirements of Mitigation Measures A-1, A-2, and A-4 from the MMP, and has been approved by CDFG and USFWS.

4.1.1.2 Characteristics of the Surrounding Viewshed

A. Surrounding Land Uses

Since the El Sobrante Landfill was first permitted for operation as a landfill facility, the development patterns within vicinity of the landfill have been in a constant state of change. Figure 4.1-1, *Historical Development Patterns*, depicts a series of aerial photographs depicting land uses between 1980 and 2008. As shown, at the time the El Sobrante Landfill was first approved for operation in 1984, the surrounding areas consisted largely of open space and agricultural land uses, with one industrial operation located southerly of the landfill site. Over time, most of the agricultural land uses have been developed with master-planned residential communities and/or residential-serving commercial land uses. Additionally, open space areas located north and east of the landfill have remained largely undisturbed by development.

As depicted on Figure 2-3, *Surrounding Land Uses and Development*, and as shown on Figure 4.1-1, current land uses within the vicinity of the El Sobrante Landfill site consist primarily of open space, light industrial, mining, rural residential, and urban residential. The majority of development within the surrounding areas includes rural and suburban residential neighborhoods and industrial operations.

Specifically, areas north and east of the Project site are undeveloped and consist of open space-conservation habitat. Areas south and southeast of the El Sobrante Landfill are characterized by hilly terrain and scattered rural residential home sites. A majority of the residences in this area are constructed on hillsides and ridgelines.

Southwest of the El Sobrante Landfill site is an industrial operation. The site is improved with four (4) large warehouse buildings and several smaller buildings, all of which are constructed of white metal siding and roofing. The majority of the site is dedicated to the outdoor storage of concrete piping and associated pipe products. Further southwest are several mining operations (located on the western and eastern sides of I-15), primarily consisting of clay and aggregates mining.

Development just west of the Project site includes the Synagro RCF on approximately 162 acres. The site has been cleared and contains stockpiles of compost and cover materials (*i.e.*, soil). Site improvements are minimal and include dirt roadways that traverse the site in north-south and east-west directions, and a single-story prefabricated structure. Hauling trucks are scattered about the site to deliver and receive compost materials. In addition to providing access to the site, Dawson Canyon Road is used as an access way by hauling trucks and semi-tractor trailers associated with the Synagro RCF and Gail Trucking. Further west is I-15, a six-lane freeway that serves as a primary north-south thoroughfare for western Riverside County. Several light industrial operations are located along the eastern side of I-15, while traditional suburban residential subdivisions form the predominant land use west of the freeway. The single-family homes west of the freeway are characterized as medium density residential development (approximately 3 to 8 dwelling units per acre), which are served by a hierarchical street network with a full complement of nighttime street lighting.

Figure 4.1-1 Historic Development Patterns

B. Viewshed Inventory

As described in SEIR Chapter 3.0, the Project is proposing to alter the operational characteristics at the landfill. Accordingly, implementation of the Project would not affect any of the aesthetic conditions previously evaluated in the Expansion EIR. As the majority of potential aesthetic changes proposed by the Project are associated with vehicular trips along access roads, potential impacts to aesthetics are limited only to the potential for light trespass impacts associated with proposed changes in traffic to and from the landfill (i.e., additional traffic to and from the landfill between the hours of 12:00 Midnight and 4:00AM).

In order to assess the visibility of the proposed change in operations at the El Sobrante Landfill from surrounding areas, a viewshed inventory has been prepared and is shown on Figure 4.1-2, *Viewshed Analysis Key Map*. A total of 15 view points were identified along the route that vehicles travel to access the Landfill from I-15 (via Temescal Canyon Road, Dawson Canyon Road, and the landfill access roadway). Using existing topographic data for the surrounding community and using Geographic Information Systems (GIS), areas that are visible from any location along the access routes the landfill were simulated and are shown on Figure 4.1-1.

Based on areas that were determined to be visible from the access roadways leading to the landfill, further GIS data and aerial photography were consulted to identify potentially sensitive land uses within areas visible from the access routes. Specifically, all parcels that were identified as containing residential land uses (the only light-sensitive land use in the surrounding area) and that were determined to be visible from the access roads were considered to be potentially impacted by the proposed Project. Potentially affected land uses were then assigned one of eight study groups for further analysis. As shown, sensitive land uses visible from the landfill access roads include three groups of rural residential areas to the south and southeast, and five groups of urban-density residential land uses located westerly of I-15.

It should be noted that the viewshed analysis depicted on Figure 4.1-2 is reflective of local topographic conditions only, and that views of the Project site and the access road may be obstructed in some areas by intervening development and landscaping features. Nonetheless, as shown on Figure 4.1-2, local topography severely limits views of the Project site and access roadways from off-site locations, beyond a radius of approximately 1.5 miles.

4.1.1.3 Regulatory Context

A. Scenic Highways

The Lake Mathews/Woodcrest Area Plan and the Temescal Canyon Area Plan identify designated and eligible scenic highways and roadway corridors. The Lake Mathews/Woodcrest Area Plan identifies Cajalco Road, located approximately two (2) miles north of the Project site, as a County-Eligible Scenic Highway. Under existing conditions, the El Sobrante Landfill site is not visible from Cajalco Road due to intervening topography. In addition, the Temescal Canyon Area Plan identifies I-15, located approximately one-mile west of the El Sobrante Landfill, as a State-Eligible Scenic Highway. The landfill is visible from several portions of I-15 as it passes the site, but a majority of the landfill is screened by intervening topography, vegetation, and/or development.

Figure 4.1-2 Viewshed Analysis Key Map

B. Light Pollution Ordinance

The County's Light Pollution Ordinance (Riverside County Ordinance No. 655) provides restrictions on artificial outdoor lighting elements in order to minimize light pollution and to protect against its detrimental effects on astronomical research at the Palomar Observatory. The Light Pollution Ordinance defines two zones, Zones A and B, and applies standards for lighting elements within each zone. Zone A encompasses areas within a 15-mile radius of the Observatory and Zone B includes all areas within a 45-mile radius of the Observatory. The Project site is located outside the 15-mile radius of Zone A and outside the 45-mile radius of Zone B. Accordingly, the Project is not subject to the Zone A or Zone B requirements of the Riverside County Light Pollution Ordinance.

4.1.2 Basis for Determining Significance

The proposed Project would result in a significant impact to Aesthetics if any of the following would occur as a result of a Project-related component:

1. *The Project would adversely affect a scenic vista or highway.*

2. *The Project would have a demonstrable negative aesthetic effect.*

3. *The Project would create new sources of night lighting or glare.*

(Source: El Sobrante Landfill SWFP Revision Project Initial Study; August 9, 2007)

4.1.3 Impact Analysis

4.1.3.1 No Impacts/Less Than Significant Impacts

Issue No. 1: Would the Project adversely affect a scenic vista or highway

Issue No. 2: Would the Project have a demonstrable negative aesthetic effect?

The Expansion EIR prepared for the El Sobrante Landfill (SCH No. 1990020076) includes an in-depth analysis of potential adverse impacts to the overall visual quality and character of the El Sobrante area as well as potential impacts to scenic vistas and County- and State-Eligible Scenic Highways. As a result of the previous analysis, several significant adverse impacts to visual quality were identified. Mitigation measures were included in the Expansion EIR to reduce potential visual quality impacts to below a level of significance, and the required mitigation measures have been incorporated into the operational characteristics of the El Sobrante Landfill, as described above in Section 4.1.1.1.

Implementation of the proposed Project would result in minor modifications to the operational characteristics of the landfill, as waste would be accepted 24 hours a day, seven days per week. No lateral or vertical expansion of the landfill site would occur as a result of the Project, and no new buildings or structures would be constructed on-site upon implementation of the Project. In addition, all mitigation measures identified in the Expansion EIR would continue to be enforced upon implementation of the proposed Project. Accordingly, the Project would not result in any new significant impacts to local visual quality, scenic vistas, or scenic highways beyond those identified in the Expansion EIR, and no additional mitigation measures would be required.

Issue No. 3 Would the Project create new sources of night lighting or glare?

As discussed in Section 2.4, waste-processing operations occur on-site 24 hours per day, seven days per week, while waste deliveries are accepted on a daily basis, from the hours of 4:00 AM to 12:00 Midnight. Implementation of the Project would extend the hours for waste delivery from 20 hours to 24 hours per day (on-site waste processing and maintenance operations would continue to occur over a continuous 24-hour period). Because the scope of nighttime operations at the landfill would be expanded, implementation of the Project has the potential to introduce increased artificial lighting into the surrounding areas during non-daylight hours. On-site landfill operations (*i.e.*, waste processing and site maintenance) would not change as a result of the Project. In addition, mitigation measures identified in the Expansion EIR to reduce potential impacts associated with on-site artificial lighting (see Mitigation Measures A-5 and A-6) would continue to be enforced upon implementation of the Project. Accordingly, there is no potential for the Project to result in visual quality impacts due to artificial lighting and glare at the landfill site that were not analyzed in the Expansion EIR.

The Project, however, would contribute traffic to Temescal Canyon Road, Dawson Canyon Road, and the landfill access roadways over a greater period of time during non-daylight hours than under existing conditions, as vehicles would travel to and from the site to deliver waste over a continuous 24-hour period. Artificial lighting (*i.e.*, headlights) associated with vehicles traveling to and from the El Sobrante Landfill could result in a significant adverse impact to nighttime visual quality in the surrounding area. Although there are no residences located immediately adjacent to Temescal Canyon Road, Dawson Canyon Road, or the landfill access roadways, a significant impact would occur if the light emitted by the vehicle headlights would spill into residential properties or homes that have an unobstructed view of these roadways, resulting in a form of light pollution referred to as "light trespass." Typical adverse effects associated with light trespass include the disruption of a nighttime view due to glare and the disruption of sleep due to light shining through windows.

The following discussion analyzes the potential for vehicle headlights from Project-related traffic to impact the nighttime visual characteristics of the Project area. As depicted on Figure 4.1-2, the El Sobrante Landfill and its access route are visible from portions of eight (8) residential areas in the Project vicinity. Five (5) of the residential areas that may be exposed to the headlights of vehicles traveling to-and-from the site during non-daylight hours are located west of I-15 and three (3) residential areas are located east of I-15.

A. Potential Impacts to Residential Areas West of Interstate 15

Each of the five residential areas located west of I-15 (i.e., Groups 1 through 5 on Figure 4.1-2) are separated from the El Sobrante Landfill and its access route by a minimum distance of approximately 0.5-mile. According to the standards of the 2008 California Vehicle Code (§24400-24411), lower beam vehicle headlamps emit sufficient light to illuminate an area a minimum of 100 feet away, and upper beam headlights shall emit sufficient light to illuminate an area a minimum of 350 feet away, respectively. Under a worst-case scenario, assuming the maximum intensity of light emitted by vehicle headlights is four times stronger than the minimum standards established in the Vehicle Code and would provide illumination to an area approximately 0.25-mile away, the residential communities west of I-15 would be located beyond the effective illumination range of Project vehicle headlights. Accordingly, the headlights of vehicles traveling to-and-from the El Sobrante Landfill during non-daylight hours would not result in light trespass. In addition, these residential areas are located west of I-15 and are urbanized in character with streetlights illuminating all roadways. These existing streetlights would help reduce the effect of any headlight impacts associated with additional

traffic at the landfill during non-daylight hours. Because these communities already feature sources of artificial lighting during non-daylight hours, and the headlights of vehicles traveling to-and-from the Project site would not produce a significant amount of illumination visible from these off-site areas (as described above), headlights generated by the Project during nighttime hours would not result in the exposure of these existing light-sensitive uses to substantial light levels. As such, lighting impacts to light-sensitive land uses within Groups 1 through 5 on Figure 4.1-2 would not be significant.

B. Potential Impacts to Residential Areas East of Interstate 15

As depicted on Figure 4.1-2, three (3) residential areas in the Project vicinity are located east of I-15. These residential areas are located between approximately 0.25-mile and 1.5 miles from the El Sobrante Landfill and/or its access route, and are identified as Groups 6 through 8 on Figure 4.1-2. Unlike areas west of I-15, which are characterized by urban development, areas east of I-15 are composed primarily of sparse rural residential development featuring large lots and low residential densities. Also, this area features no streetlights and there are very few sources of outdoor artificial light under existing conditions. Because of the relative close distance to the El Sobrante Landfill and its access route, and the lack of existing sources of outdoor artificial light that would otherwise reduce the potential for light trespass from the site, residential development in the Project vicinity (east of I-15) is susceptible to adverse visual impacts related to artificial lighting during non-daylight hours.

Due to the increased potential for light trespass in these areas, additional analysis was conducted for Groups 4 through 6 to determine whether light-sensitive uses would be impacted by the proposed Project. Figure 4.1-2 merely shows areas within the surrounding community that are visible from the access roads to the landfill, but does not take into account the directional orientation of vehicles traveling along these roadways. Where an area is only visible perpendicularly to the access roadways, then it can be reasonable assumed that no direct headlight impacts would occur.

In order to further determine the potential for light trespass on light sensitive uses within Groups 6 through 8, the viewshed map depicted on Figure 4.1-2 was refined for each Group to exclude view points where the roadway is not oriented towards the light-sensitive land uses. For example, viewpoints 7 and 8 on Figure 4.1-2 have no potential to result in light trespass on sensitive land uses within Group 6, as all headlights would be oriented in a general north-south direction. Because the light-sensitive land uses within Group 6 are located easterly of the roadway, no headlights would impact Group 6 from this location. Based on this analysis, a new series of viewshed maps were produced and are depicted on Figure 4.1-3 through Figure 4.1-6. Each is discussed below.

❑ Group 6

Group 6 is located along Dawson Canyon Road, adjacent to the southeastern boundary of the Project site (see Figure 4.1-2). Land uses within this group consist of scattered single-family residences on large lots. Based on the analysis of directional orientation, it was determined that light sensitive uses within Group 6 only have the potential to be impacted from Viewpoints 10 and 11. As shown on Figure 4.1-3, *Group 6 Viewshed Map*, vehicle headlights on this portion of the roadway would be visible from undeveloped portions of residential lots within Group 6; however, none of the homes within Group 6 would be impacted by headlights traveling along the landfill access roadways.

Figure 4.1-3 Group 6 Viewshed Map

Use Viewshed Analysis – Group 1A

Accordingly, implementation of the proposed Project would not result in significant adverse light trespass to any light-sensitive uses within Group 6, and a significant impact would not occur.

❑ Group 7

Group 7 is located approximately 1.5 miles southeast of the El Sobrante Landfill and its access route (see Figure 4.1-2). This area is predominantly undeveloped; however, two rural residential lots are located within this area. Based on the analysis of directional orientation, it was determined that light sensitive uses within Group 7 only could be impacted by headlights along the landfill access roads at Viewpoint 11, as this is the only location along the access roads where headlights could be oriented directly on light-sensitive uses within Group 7. As depicted on Figure 4.1-4, *Group 7 Viewshed Map*, headlights from vehicles using the landfill access roads would be visible from undeveloped portions of residential lots; however, none of the residences within Group 7 would be impacted. Accordingly, implementation of the proposed Project would not result in significant adverse light trespass to any light-sensitive uses within Group 7, and a significant impact would not occur.

❑ Group 8

Group 8 is located along Spanish Hills Drive, approximately one mile south of the landfill site. Based on the analysis of directional orientation, it was determined that light sensitive uses within Group 8 only could be impacted by headlights along the landfill access roads at Viewpoints 11 and 12, and at Viewpoints 1, 2, and 3, as these are the only locations along the access roads where headlights could be oriented directly towards light-sensitive uses within Group 8.

As depicted on Figure 4.1-5, *Group 8 – Viewshed Analysis (Viewpoints 11 and 12)*, light-sensitive land uses (i.e., single family homes) would have a direct line-of-site to the access roads and could potentially be impacted by light trespass. Based on this finding, topographical data for the surrounding area was used to prepare a cross-section depicting the vertical orientation of vehicles along the access roads in relation to residential uses within Group 8. First, the slope of the Dawson Canyon Road at Viewpoints 11 and 12 were calculated in order to determine the angle at which vehicle headlights would be projected. Second, the location and elevation of the nearest residence with an unobstructed view of Viewpoints 11 and 12 was plotted to determine if the residence would be located within the field of headlight projection, in both the horizontal and vertical planes. If the residence was located within the horizontal and vertical areas of projection, there would be the potential for light trespass. Finally, the distance of the residence from Viewpoints 11 and 12 was calculated to determine if the luminous intensity of vehicle headlights would be sufficient to result in light trespass.

As depicted on Figure 4.1-5, the light sensitive land uses within Group 8 are located within the horizontal field of projection for vehicle headlights along the landfill access routes. In addition, a residence is located within the vertical field of projection for vehicle headlights along the landfill access route, as depicted on the cross-section on Figure 4.1-5. Accordingly, there is the potential for unwanted light to spill onto the property during non-daylight hours due to the headlights of vehicles traveling to-and-from the landfill. However, the nearest residence within Group 8 is located approximately 1.1 miles east of Viewpoints 11 and 12 (the location at which light would be emitted), which would be beyond the effective illumination range of automobile headlights. As described above, under a worst-case scenario vehicle headlights would be unable to provide effective illumination beyond a maximum distance of approximately 0.25-mile. The three remaining

Figure 4.1-4 Group 7 Viewshed Map

Use Viewshed Analysis – Group 3

Figure 4.1-5 Group 8 – Viewshed Analysis (Viewpoints 11 and 12)

residences in this area with an unobstructed view of Viewpoints 11 and 12 are approximately 1.25-1.50 miles east of Viewpoints 11 and 12, and also would be located beyond the effective illumination range of vehicle headlights. Thus, headlights of vehicles traveling to-and-from the El Sobrante Landfill during non-daylight hours would not result in significant adverse impacts related to light trespass or glare from Viewpoints 11 or 12.

The entrance to the El Sobrante Landfill (Viewpoints 1, 2, and 3) also is visible from undeveloped areas within Group 8. As depicted on Figure 4.1-6, *Group 8 – Viewshed Analysis (Viewpoints 1, 2, and 3)*, one light sensitive land use within Group 8 would be within the visibility area for headlights, although the remaining residences would not be affected. Thus, for the majority of light sensitive uses within Group 8, there would be no impact due to headlights traveling along the landfill access roadway at Viewpoints 1, 2, and 3. For the one light-sensitive use potentially affected, impacts to Group 8 would be similar as those described above for Viewpoints 11 and 12. That is, vehicle headlights would not result in light trespass impacts beyond a range of approximately 0.25-mile, while the distance between the light-sensitive uses within Group 8 and Viewpoint 3 is at least 1.5 miles. Thus, the one potentially affected light-sensitive use within Group 8 is located approximately six times the effective distance in which headlights could result in significant light trespass impacts. Therefore, implementation of the proposed Project would result in less than significant impacts to light-sensitive uses within Group 8 when viewed from Viewpoints 1, 2, and 3.

4.1.4 Cumulative Impact Analysis

The anticipated growth in the area surrounding the El Sobrante Landfill would result in a partial transition of the area's character from an undeveloped and rural community to a mixture of rural and suburban residential development with industrial and commercial development interspersed. This transition would be regarded as a substantial change in visual character in areas proposed for development, but is not considered significantly adverse from an aesthetic standpoint. Continued adherence to the required mitigation measures from the Expansion EIR (Mitigation Measures A-1 through A-7) would ensure that the Project does not significantly degrade the existing visual character of the surrounding community.

Cumulative development in the Project area may result in increases in artificial light and glare emissions which may adversely impact day and nighttime views in the vicinity of the Project site, due to the introduction of artificial light sources into a previously undeveloped and rural area. As described in the analysis above, the Project only has the potential to result in adverse impacts related to night lighting and glare along the access route to the El Sobrante Landfill. Upon implementation of the Project, the El Sobrante Landfill would continue to be closed to the public from 6:00 PM to 6:00 AM. Accordingly, vehicular traffic would be restricted to commercial waste haulers and the total number of trips would not increase above levels proposed by the Project. Thus, there would be no cumulative increase in artificial lighting along the landfill access routes. In addition, artificial lighting from vehicle headlights would not illuminate an area beyond a maximum of 0.25-mile from the El Sobrante Landfill access route. Because all anticipated development in the Project area would occur well beyond the illumination range of Project vehicle headlights, there is no potential for the Project to contribute significant cumulative light and glare impacts.

Figure 4.1-6 Group 8 - Viewshed Analysis (Viewpoints 1, 2, and 3)

4.1.5 Significance of Impacts Prior to Mitigation

Issues 1 and 2: No Impact. The proposed Project would not result in any new impacts to local visual quality, scenic vistas, or scenic highways that were not analyzed in the Expansion EIR; therefore, a significant impact would not occur.

Issue 3: Less than Significant. Implementation of the Project would not result in significant adverse impacts related to night lighting or glare.

4.1.6 Mitigation Measures

Many of the mitigation measures required by the Expansion EIR and MMP have been implemented, although some mitigation measures would continue to be enforced (refer to Table S-1 for a summary of mitigation measures for Aesthetics that would remain in effect with approval of the proposed Project). As indicated in the above analysis, no impacts have been identified in association with the proposed Project, and additional mitigation is therefore not necessary.

4.2 Air Quality

The following analysis is based on the *El Sobrante Air Quality Analysis*, prepared for the proposed Project by Urban Crossroads and dated April 22, 2008. A copy of the technical report is provided as Appendix B to this SEIR. Current air quality conditions at the El Sobrante Landfill site are presented in the Expansion EIR, and implementation of mitigation requirements pursuant to the Expansion EIR is documented in the Annual Monitoring Reports (AMR) through 2007, which are prepared for the Citizen Oversight Committee (COC) and the BOS. It should be noted that mitigation measures listed in the MMP for the Expansion Project will continue to be enforced upon implementation of the proposed Project, if they are still applicable. The mitigation measures that are still in effect for the proposed Project are listed and updated in SEIR Table S-1.

4.2.1 Existing Conditions

4.2.1.1 Atmospheric Conditions

The proposed Project site is located in the inland expanses of the Santa Ana Mountains, which is the transitional microclimatic zone of the South Coast Air Basin (SCAB), between a valley marginal and high desert climate. Located far enough from the ocean to escape its major influences, the summers are hot and the winters are sunny but cool. Annual average daytime temperatures range from 98.7° Fahrenheit (F) in July and 66°F in January. Overnight low temperatures vary from 59.4°F in the summer to 35.6°F during the winter. Annual precipitation for the area is 11.66 inches and occurs primarily from November to March.

4.2.1.2 State and Federal Regulatory Requirements

Existing air quality is measured based upon ambient air quality standards. These standards are the levels of air quality that are considered safe, within an adequate margin of safety, to protect the public health and welfare. Those standards currently in effect for both California and federal air quality standards are shown in Table 4.2-1, *State and Federal Air Quality Standards*.

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the state and federal standards presented in Table 4.2-1. The air quality in a region is considered to be in attainment by the state if measured ambient air pollutant levels for Ozone (O_3), Carbon Monoxide (CO), Sulfur Dioxide (SO_2), Nitrogen Dioxide (NO_2), Inhalable Particulates (PM_{10}), and Ultra-Fine Particulates ($PM_{2.5}$) are not equaled or exceeded more than once per year. The O_3 standard is attained when the fourth highest eight-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when 99 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Table 4.2-2, *Attainment Status of Criteria Pollutants in the South Coast Air Basin*, summarizes the attainment status in the basin based on the California Air Resources Board's (CARB) Area Designations. Due to the variations in both the regional meteorology and in area-wide differences in levels of air pollution emissions, patterns of non-attainment have strong spatial and temporal differences.

Table 4.2-1 State and Federal Air Quality Standards

Pollutant	Averaging Time	California Standards	Federal Standards	
		Concentration	Primary	Secondary
Ozone (O_3)	1 Hour	0.09 ppm (180 Ėg/m^3)	--	Same as Primary
	8 Hour	0.07 ppm (137 Ėg/m$^{3)}$	0.08 ppm (157 Ėg/m^3)	
Respirable Particulate Matter (PM_{10})	24 Hour	50 Ėg/m^3	150 Ėg/m^3	Same as Primary
	AAM	20 Ėg/m^3	--	
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	--	35 Ėg/m^3	Same as Primary
	AAM	12 Ėg/m^3	15 Ėg/m^3	
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 Ėg/m^3)	9 ppm (10 Ėg/m^3)	None
	1 Hour	20 ppm (23 Ėg/m^3)	35 ppm (40 Ėg/m^3)	
Nitrogen Dioxide (NO_2)	AAM	0.03 ppm (56 Ėg/m^3)	0.053 ppm (100 Ėg/m^3)	Same as Primary
	1 Hour	0.18 ppm (338 Ėg/m^3)	--	
Sulfur Dioxide (SO_2)	AAM	--	0.03 ppm (70 Ėg/m^3)	--
	24 Hour	0.04 ppm (105 Ėg/m^3)	0.14 ppm (365 Ėg/m^3)	--
	3 Hour	--	--	0.5 ppm (1300 Ėg/m^3)
	1 Hour	0.25 ppm (655 Ėg/m^3)	--	--
Lead	30 Day Average	1.5 Ėg/m^3	--	--
	Calendar Quarter	--	1.5 Ėg/m^3	Same as Primary
Visible Reducing Particulates	8 Hour	Extinction coefficient of 0.23 per kilometer – visibility of 10 miles or more due to particles when relative humidity is less than 70 percent.	**No Federal Standards**	
Sulfates	24 Hour	25 Ėg/m^3		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 Ėg/m^3)		
Vinyl Chloride	24 Hour	0.01 ppm (26 Ėg/m^3)		

1. AAM = Annual Arithmetic Mean. Source: California Air Resources Board (2/22/2007)

Table 4.2-2 Attainment Status of Criteria Pollutants in the South Coast Air Basin

Pollutant	Federal Designation	State Designation
Ozone – 8 hour standard	Non-attainment – Severe 17	Not Established
Ozone – 1 hour standard	Revoked June 2005	Extreme Non-attainment
Carbon Monoxide	Non-Attainment	Attainment
PM_{10}	Serious Non-Attainment	Non-Attainment
$PM_{2.5}$	Non-attainment	Non-Attainment
NO_2	Unclassified/Attainment	Attainment

Source: CARB, Attainment Designation Fact Sheets, January 2006, Urban Crossroads, 2008.

4.2.1.3 Landfill Odors and Emissions

- **Landfill Odors**

Methane and carbon monoxide are the primary gaseous constituents for the landfill. These compounds are produced by microorganisms within the landfill under anaerobic conditions. Landfill gases also contain a small amount of non-methane organic compounds (NMOC). The NMOC

fraction contains VOCs, greenhouse gases, and compounds associated with stratospheric ozone depletion. To control these emissions, the facility utilizes a gas collection system, which combusts the collected gas through the use of internal combustion engines, flares, and/or turbines. According to a 1995 monitoring report, published by the SCAQMD, VOCs collected during the monitoring exercise were considered endemic to landfill operations and other industrial activities at "concentrations too low to qualify" and "no source-receptor relationship may be inferred."

❑ Landfill Emissions

Air pollutants are emitted in limited amounts from a variety of activities at the El Sobrante Landfill site. Current site emissions at the landfill result from worker-commute, waste-processing equipment, soil cover equipment, and equipment maintenance. Existing sources of air pollutants include:

- Exhaust emissions from loaded packer trucks and public vehicles traveling from the landfill gate to the working face of the landfill, and the return trips of empty vehicles back to the site exit.
- Exhaust emissions from scrapers, dozers, compactors, water trucks, and other operations equipment.
- Combustion emissions resulting from the combustion landfill gas (LFG) in the energy recovery facility (ERF). The ERF combusts LFG to generate electricity. To further reduce emissions or unburned hydrocarbons, each ERF unit contains an afterburner that destroys 80 percent of the reactive organic gasses (ROGs) that are not destroyed in the engine-generator set.
- Combustion of LFG in a waste gas flare. The flare system is a back-up system to the ERF, and used to supplement or replace if the ERF is inoperative due to maintenance or repair, or unable to handle 100% of the LFG collected.
- Surface emissions of LFG containing ROGs and trace amounts of toxic air contaminants from the fraction of LFG not captured by the control system.
- Fugitive dust from vehicle travel on unpaved surfaces from the extraction and transport of cover material, from the placement of daily cover, and from dust in certain types of refuse such as demolition debris or scrap green waste.

Baseline air quality within the El Sobrante area has been established by ambient air quality measurements collected by the SCAQMD at the monitoring stations closest to the site. The nearest long-term air quality monitoring site in relation to the proposed Project for PM_{10} is carried out by the SCAQMD at the Norco/Corona monitoring station, located approximately 10.5 miles northwest of the El Sobrante Landfill site. The Metropolitan Riverside County 2 and Lake Elsinore monitoring stations, located approximately 11.4 and 12.0 miles, respectively, were utilized in lieu of the Norco/Corona monitoring station only where data was not available from the nearest monitoring station.

Table 4.2-3, *Project Area Air Quality Monitoring Summary, 2004-2006*, summarizes the previous three (3) years of published data from the Norco/Corona monitoring station, the metropolitan Riverside County 2 monitoring station, and the Lake Elsinore monitoring station. Data for SO_2 was omitted because attainment is regularly met in the SCAB and few monitoring stations measure SO_2 concentrations. As shown in the tables, standards have not been exceeded for CO, NO_2, or PM_{10} in the previous three (3) years. Standards for O_3 were exceed for one (1) day within the previous three

years in 2005 and standards were exceeded for $PM_{2.5}$ for two (2), one (1), and nine (9) days per year for 2004, 2005, and 2006, respectively.

Table 4.2-3 Project Area Air Quality Monitoring Summary, 2004-2006[1]

Pollutant	Standard	2004	2005	2006
Ozone (O_3)[3]				
Maximum 1-hour Concentration (ppm)		0.130	0.149	0.14
Maximum 8-hour Concentration (ppm)		0.116	0.119	0.109
No. Days Exceeding State 1-Hour Standard	> 0.09 ppm	41	37	40
No. Days Exceeding State 8-Hour Standard	> 0.07 ppm	51	46	58
No. Days Exceeding Federal 1-Hour Standard	> 0.12 ppm	2	4	3
No. Days Exceeding Federal 1-Hour Standard	> 0.08 ppm	21	15	24
No. Days Exceeding Health Advisory	ƒ 0.15ppm	0	1	0
Carbon Monoxide (CO)[2]				
Maximum 1-hour Concentration (ppm)		4	4	4
Maximum 8-hour Concentration (ppm)		2.1	2.4	2.3
No. Days Exceeding State 8-Hour Standard	ƒ 9.0 ppm	0	0	0
No. Days Exceeding Federal 8-Hour Standard	ƒ 9.5 ppm	0	0	0
Nitrogen Dioxide (NO_2)[3]				
Maximum 1-hour Concentration (ppm)		0.06	0.07	0.07
Annual Arithmetic Mean Concentration (ppm)		0.0151	0.0142	0.0151
No. Days Exceeding State 1-Hour Standard	> 0.25 ppm	0	0	0
Inhalable Particulates (PM_{10})				
Maximum 24-Hour Concentration ($\mu g/m^3$)		76	79	74
No. of Samples		57	58	57
No. of Samples Exceeding State Standard	> 50 $\mu g/m^3$	11	5	10
No. of Samples Exceeding Federal Standard	> 150 $\mu g/m^3$	0	0	0
Ultra-Fine Particulates ($PM_{2.5}$)[2]				
Maximum 24-Hour Concentration ($\mu g/m^3$)		93.8	95.0	55.3
Annual Arithmetic Mean ($\mu g/m^3$)		20.8	18.0	17.0
No. Samples Exceeding Federal 24-Hour Standard	> 65 $\mu g/m^3$	2	1	9

1. Norco/Corona Monitoring Station data used unless otherwise noted.
2. Metropolitan Riverside County 2 Monitoring Station Data.
3. Lake Elsinore Monitoring Station Data. Source: South Coast AQMD.

❑ Implemented Preventative Measures

The El Sobrante Landfill, which has been operational since 1986, is subject to and compliant with various mitigation measures found within the MMP that reduce potential impacts to air quality to a level below significance (see Table S-1). Current emissions levels pursuant to the existing SWFP are presented below in Table 4.2-4, *Current 20-Hour Operational Vehicle and Equipment Emissions by Process (Pounds per Day).* Mitigation measures from the MMP include the following procedural requirements:

- Landfill gas collection and control of emissions, including fugitive dust (measures AQ-1 and AQ-2);
- Conformance with regulatory requirements for PM_{10}, Nitrogen Oxides (NO_X), ROGs, and CO levels (measures AQ-3 through AQ-6);

- Activities during construction and large operation activities (measures AQ-7 through AQ-11 and AQ-14).
- Goals for emissions reductions and advancement in fuel technology using natural gas fuel or other alternative fuels (measures AQ-12 and AQ-13).

Table 4.2-4 Current 20-Hour Operational Vehicle and Equipment Emissions by Process (Pounds Per Day)

Process	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Waste Processing	12.49	208.16	177.85	0.37	9.88	9.61
Soil Cover	6.25	76.20	38.13	0.11	3.22	3.06
Green Waste Processing	2.12	28.00	12.07	0.04	1.08	1.02
Misc. Tasks and Equipment	5.77	35.66	19.03	0.04	2.07	1.91
Equipment Maintenance	6.88	73.56	18.17	0.07	2.54	2.33
Worker Commute	11.91	73.62	94.02	0.12	2.81	2.35
Total	**45.41**	**495.19**	**359.27**	**0.75**	**21.60**	**20.28**

Source: Urban Crossroads, Inc., Hand Calcs, 2008 & SCAQMD 2008.

4.2.1.4 Global Climate Change

Global temperatures are regulated by naturally occurring atmospheric gases, such as water vapor, CO_2 (carbon dioxide), N_2O (nitrous oxide), CH_4 (methane), hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the Earth's atmosphere, but prevent radioactive heat from escaping, thus warming the Earth's atmosphere. Without the natural greenhouse gas (GHG) effect, the Earth's average temperature would be approximately 61° Fahrenheit (F) cooler than it is currently.

Global Climate Change (GCC) is simply defined as the change in average meteorological conditions on Earth with respect to temperature, precipitation, and storms. GHGs are released into the atmosphere by both natural and anthropogenic (human) activity. GCC is a controversial issue and much debate exists within the scientific community whether or not GCC is the result of natural shifts, the result of human activity, or the result of both. Some data suggests that GCC has occurred in the past over the course of thousands or millions of years. These climate changes occurred naturally without human influence, as in the case of an ice age. However, many scientists believe that the climate shift presently taking place is occurring at a quicker rate and magnitude.

Each year, the Environmental Protection Agency (EPA) prepares an inventory of national GHG emissions in order to track emissions trends and compare data on a global level. In the United States, the most abundant GHG emitted by human activity is carbon dioxide, comprising approximately 85 percent of total GHG emissions. Methane emissions, which are associated with livestock and waste decomposition, have steadily declined since 1990. Nitrous oxide emissions, produced by agricultural processes and motor vehicle exhaust, have decreased slightly since 1990.

GCC first became a matter of concern in the 1980s, and in 1988, the United Nations created the Intergovernmental Panel on Climate Change (IPCC) in order to assess the potential impacts of global warming and develop strategies that could be instituted by nations in order to reduce GHG emissions.

In order to manage California's energy needs and promote energy efficiency, AB 1575 created the California Energy Commission (CEC) in 1975. Additionally, Title 24 Part 6, enacted in 1978, required buildings to meet energy efficiency standards. Vehicle emissions of GHGs were targeted in 2002 with the passage of AB 1493, which required the CARB to develop regulations to limit GHG emissions by cars and light duty trucks. Pending successful litigation and a waiver from the EPA, these measures will go into effect in 2009, and it is estimated that vehicle emissions of GHGs will be reduced by approximately 18 percent by 2020 (CARB 2004).

In 2006, Assembly Bill 32 (AB 32), the California Global Warming Solutions Act, was signed into law, giving the CARB primary responsibility for reducing statewide greenhouse gas emissions to 1990 levels by 2020. The CARB is also required by January 1, 2008 to determine GHG emission levels for 1990 and to approve a statewide GHG emissions limit to be achieved by 2020 that is based on this level. On April 20, 2007, CARB published Proposed Early Actions to Mitigate Climate Change in California, which outlines recommendations for discrete early action measures to reduce GHG emissions.

In August 2007, Senate Bill 97 (SB 97) was adopted, which addresses GHG analysis under CEQA. SB 97 requires the California Office of Planning and Research to prepare and submit guidelines to the Resources Agency for the mitigation of GHG emissions and their effects by July 1, 2009. The Resources Agency is required to adopt regulations by January 1, 2010.

Currently, the CARB is developing guidance in limiting criteria for GHG emissions and the modeling of project specific contributions to GHG emissions. In addition to emitting other non-CO_2 gases, landfills contribute a majority of greenhouse gases through CH_4, which is 21 to 23 times more potent than CO_2. Based on the CARB draft inventory of greenhouse gases in 2004, solid waste contribution to GHG emissions was about 5.83 millions of metric tons of CO_2 equivalent[1] ($MMCO_2E$), which equates to less than 0.01%[2] to the net GHG emissions in California. Even with the addition of emissions from energy creation through landfill gas to energy technologies, the result would still be less than 0.01% of total emissions.[3] This finding is consistent with the conclusions of the IPCC 4th Assessment Report, "Climate Change 2007" (also referred to as AR4), that post-consumer waste is a small contribution to global GHG emissions.[4] Implementing integrated strategies, such as those identified below involving recycling, composting, and gas collection and energy recovery, serve to significantly reduce GHG emissions by recovering materials and energy from the municipal solid waste stream:

- Reduce the volume and toxicity of municipal solid waste by implementing and promoting programs and/or facilities to reduce, reuse, and recycle in compliance with California Integrated Waste Management Act of 1989 and AB 939 requirements.

- Improve landfill methane capture through the latest technology in effective landfill collection gas systems, assisting in decreasing GHG emissions an estimated 13 to 26 $MMTCO_2E$.[5]

[1] Draft California Greenhouse Gas Inventory, Air Resources Board (August 2007)
[2] Ibid., California Total net GHG emissions (2004) = 496.95
[3] Ibid., Instate Generation-Merchant Owned-Landfill gas (2004): CO= .011; N20=.022
[4] GHGs from waste include landfill and wastewater methane, wastewater N_2O, and CO_2 from incineration of fossil carbon.
[5] Proposed Early Actions to Mitigate Climate Change in California, California Air Resources Board

- Utilize the latest technology in gas to energy systems that would minimize the amount of CH_4 and non-CO_2 GHG emissions.

- Improve data collection of fugitive CH_4 and non-CO_2 GHGs to better determine the contributions of landfill operation to GHG emissions.

4.2.2 Basis for Determining Significance

The proposed Project would result in a significant impact to Air Quality if any of the following would occur as a result of a Project-related component:

1. *Violation of any air quality standard or contribution to an existing or projected air quality violation.*

2. *Exposure of sensitive receptors to substantial air pollutants.*

3. *Alteration to air movement, moisture, or temperature, or result in any change in climate.*

4. *Creation of objectionable odors.*

5. *An inconsistency with the 2003 Air Quality Management Plan.*

(Source: El Sobrante Landfill SWFP Revision Project Initial Study, August 9, 2007)

4.2.3 Impact Analysis

4.2.3.1 Compliance with Applicable Air Quality Standards (Threshold 1)

The SCAQMD has developed significance thresholds based on the volume of each pollutant emitted. The SCAQMD's *CEQA Air Quality Handbook, 1993* states that any project in the District with daily emissions that exceed any of the thresholds as shown in Table 4.2-5, *SCAQMD Maximum Daily Thresholds*, should be considered as having an individually and cumulatively significant air quality impact. Cumulative impacts are discussed below in section 4.2.4 of this subchapter.

The SCAQMD has established specific significance criteria to account for the continued degradation of local air quality conditions. As indicated in Table 4.2-6, *Proposed 24-Hour Operational Vehicle and Equipment Emissions by Process (Pounds Per Day)*, emissions associated with the revisions to the El Sobrante Landfill SWFP would result in some increases in emissions, however air quality emissions would not exceed SCAQMD's regional or localized thresholds for VOCs, CO, or SO_x. As such, the Project would comply with applicable air quality standards for these criteria pollutants, and impacts would be less than significant. Nonetheless, the Expansion EIR determined that Project emissions for NOx, ROGs, SOx, and CO emissions were potentially significant, and mitigation measures AQ-1 through AQ-14 were identified to reduce these impacts to a level below significant. In addition, it should be noted that since certification of the Expansion EIR, approximately 70% of El Sobrante's heavy equipment has been upgraded, and close to two-thirds of the equipment now meets Tier II or Tier III emission standards set by the SCAQMD. The equipment upgrade has resulted in an approximate 81% reduction of nitrogen oxide emissions. Additionally, new landfill gas flares that have since been installed on-site are 75% more efficient than previous models in reducing emissions of NOx. With implementation of the proposed Project, the Expansion EIR mitigation measures

would remain in effect and the upgraded equipment would still be utilized on-site; as such, impacts would continue to be less than significant.

Table 4.2-5 SCAQMD Maximum Daily Thresholds

Pollutant	Operations (lbs/day)
NO_X	100
VOC	75
PM_{10}	150
$PM_{2.5}$	55
SO_X	150
CO	550
Ambient Air Quality for Criteria Pollutants (LSTs)	
NO_X	423
CO	1,664
PM_{10}	8
$PM_{2.5}$	3

Source: SCAQMD, 2008.

As indicated in Table 4.2-6, implementation of the proposed revisions to the SWFP may result in an increase in NOx emissions of 37.10 pounds per day, which is below the SCAQMD regional and localized thresholds of significance. However, as shown, total emissions from the landfill, when existing emissions are considered, would exceed the SCAQMD thresholds of significance for this criteria pollutant. This potential impact was identified and disclosed in the Expansion EIR, and Mitigation Measure AQ-13 from the MMP was imposed to address this impact.

Mitigation Measure AQ-13 requires that USA Waste provide emission reductions of NOx and its precursors, sufficient to result in no net increase of project (i.e., non-construction) emissions after correction to baseline emissions, as defined in the Expansion EIR. The required mitigation requires USA Waste to determine the amount of annual emission offsets for NOx, which are needed for the upcoming year. The emission offset calculations require an estimate of the baseline NOx emissions prior to the landfill expansion and a comparison to the projected 2008 NOx emissions from both stationary and mobile sources at the site. If emission increases are determined to occur, USA Waste must provide written proof of acquisition of emission reduction credits (ERCs) in sufficient quantity to ensure no net increases in NOx. Based on the results of the analysis for the 1998 ERC requirements pursuant to Mitigation Measure AQ-13, and as documented in a letter dated September 13, 2007 from SCS Engineers (SCS) on behalf of USA Waste (refer to Attachment A of the El Sobrante Air Quality Analysis, provided as Appendix B to this SEIR), landfill operations are projected to result in a net reduction of 462.0 pounds per day of NOx emissions relative to the baseline conditions. Thus, for 2008, USA Waste was not required to purchase any ERCs for NOx emissions.

Table 4.2-6 Proposed 24-Hour Operational Vehicle and Equipment Emissions by Process (Pounds Per Day)

Process	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Waste Processing	13.71	213.71	192.78	0.42	11.31	10.98
Soil Cover	4.79	68.16	35.56	0.11	2.69	2.58
Green Waste Processing	2.13	27.15	11.54	0.04	1.06	1.00
Misc. Tasks and Equipment	6.63	39.06	22.11	0.05	2.37	2.18
Equipment Maintenance	9.47	101.24	25.01	0.10	3.49	3.21
Worker Commute	13.42	92.97	105.96	0.13	3.16	2.65
Project Total	**50.15**	**532.29**	**392.96**	**0.84**	**24.09**	**22.61**
Existing Condition	**45.41**	**495.19**	**359.27**	**0.75**	**21.60**	**20.28**
Net Difference in Emissions	4.73	37.10	33.69	0.09	2.50	2.33
SCAQMD Regional Threshold	75	100	550	150	150	55
SCAQMD Localized Threshold	N/A	423	1,664	N/A	8	3
Significant?	**No[1]**	**No[1]**	**No[1]**	**No[1]**	**No[1]**	**No[1]**

1. Assumes continued enforcement of Mitigation Measures AQ-1 through AQ-14 from the 1998 FEIR/2006 AMR.
Source: Urban Crossroads, Inc., Hand Calcs, 2008 & SCAQMD 2008.

With implementation of the proposed project, Mitigation Measure AQ-13 would continue to be enforced. If the total emissions from the landfill site exceed the baseline conditions, then USA Waste would be required to purchase ERCs to reduce the anticipated increase to below baseline conditions. Therefore, with continued enforcement of Mitigation Measure AQ-13 from the MMP, Project emissions of NOx would be reduced to a level below significant.

PM_{10} emissions associated with Project-related vehicle and equipment operations listed in Table 4.2-6 do not include fugitive dust emissions. Potential impacts related to fugitive dust were previously disclosed in the Expansion EIR, and mitigation measures were provided in the MMP for the Expansion EIR to reduce fugitive dust impacts to below a level of significance. Refer to SEIR Table S-1 for a list of mitigation measures that would continue to be enforced upon approval of the proposed Project to minimize fugitive dust impacts. Fugitive dust emissions were not quantified for the proposed Project because:

- The types and quantities of equipment used for daily operations at the landfill would generally be consistent with the types and quantities of equipment that are used for existing landfill operations analyzed in the Expansion EIR;
- The quantity of soil that would be disturbed on a daily basis for the proposed Project is not anticipated to be greater than the quantity of soil excavated for existing landfill operations analyzed in the Expansion EIR; and
- The maximum number of vehicles allowed for the proposed Project on a daily basis will not exceed the limits set by the current SWFP. Consequently, the number of vehicle trips associated with landfill operation activities will not be greater than the levels analyzed in the Expansion EIR.

Accordingly, fugitive dust emissions are not expected to change substantially as a result of the proposed Project; therefore, no new significant impacts association with dust emissions would occur with Project implementation.

As shown in Table 4.2-6, although the proposed revisions to the SWFP would not exceed the SCAQMD localized or regional thresholds for significance of PM_{10}, when considered in the context of existing emissions from the site, total PM_{10} emissions would equal 24.09 pounds per day, which would exceed the SCAQMD localized threshold of 8 pounds per day. This potential impact was identified in the Expansion EIR, and mitigation measures AQ-2 through AQ-5 were imposed to reduce this impact to a level below significant. These mitigation measures generally require the following:

- Compliance with SCAQMD Rule 403;
- Emission controls as necessary to preclude visible dust emissions beyond the landfill property;
- Prohibitions on new cell construction and cell closure activities from occurring simultaneously;
- Preparation, administration, and annual updates to a required Rule 403 Fugitive Dust Emissions Control Plan (originally approved by SCAQMD in 1993);
- PM_{10} monitoring stations on-site to be operated as agreed through consultation with the SCAQMD;
- Paving of landfill roads where feasible;
- Regular sweeping/washing of paved landfill haul routes;
- Regular maintenance of on-site vehicles;
- Offset of stationary PM_{10} emission sources pursuant to SCAQMD requirements for essential public services; and
- Additional measures as necessary in the event that monitoring indicates that permissible levels of PM_{10} are being exceeded.

With implementation of the proposed Project, these measures would continue to be enforced. Therefore, implementation of the proposed Project and Mitigation Measures AQ-2 through AQ-5 would ensure that Project emissions of PM_{10} do not exceed the SCAQMD localized or regional thresholds of significance.

Furthermore, the Expansion EIR did not evaluate project emissions of $PM_{2.5}$, because the SCAQMD had not identified thresholds of significance for this criteria pollutant until 2007. Pursuant to CEQA Guidelines Sections 15162(2) and 15163(2), this new regulation is considered a minor change "…to the circumstances under which the project [was] undertaken," resulting in a new potentially significant impact not previously evaluated in the Expansion EIR. As shown in Table 4.2-6, the proposed SWFP revisions would produce only 2.33 additional pounds per day of $PM_{2.5}$ and would not result in any exceedances of the SCAQMD localized (3 pounds per day) or regional (55 pounds per day) significance thresholds for $PM_{2.5.}$ When considered in the context of existing emissions at the site, total Project $PM_{2.5}$ emissions would amount to 22.61 pounds per day, which would exceed the SCAQMD localized threshold of 3 pounds per day. According to the Project's air quality consultant (Urban Crossroads), measures in effect to address the Project's impacts resulting from PM_{10} emissions also would be effective at reducing $PM_{2.5}$ emissions, because $PM_{2.5}$ comprises a portion of fugitive PM_{10} emissions. PM_{10} monitoring at the landfill would identify any excessive fugitive dust emissions from the site and would require a series of measures (as described above) to reduce these emissions. The measures identified to reduce PM_{10} levels also would be effective in

reducing $PM_{2.5}$ levels. Therefore, with continued enforcement of Mitigation Measures AQ-2 through AQ-5 from the MMP, Project emissions of $PM_{2.5}$ would be reduced to a level below significant.

4.2.3.2 Exposure of Sensitive Receptors to Substantial Air Pollutants (Threshold 2)

ERFs operating at the El Sobrante Landfill have the potential to emit toxic air contaminants (TACs) and expose sensitive receptors to air pollutants. SCAQMD's Rule 1401 prohibits the air district from issuing an authority to construct or permit to operate any facility that would create an unacceptable public health risk from emissions of TACs. Unacceptable individual cancer risk from a permitted source equals one excess cancer in one million people. If Toxics-Best Available Control Technology (T-BACT) is employed, the allowable risk is increased to ten in one million people.

According to the analysis provided in the Expansion EIR, the ERF at the landfill and associated heavy-duty diesel vehicle exhaust underwent a Tier 4 Assessment, which is a full health risk assessment, and the calculated risk for the existing ERF was determined to be less than one in one million at full capacity. Therefore, the proposed Project is not expected to significantly alter the previous findings since no changes to the ERFs are proposed. The total daily truck trips would remain within the currently permitted maximum of 1,305 trips, and health risks associated with truck trips would not change under the proposed Project.

Lastly, a small increase in the amount of diesel-fired particulate exhaust will result from on-site equipment activities for the proposed Project, as compared to current operating conditions (see Table 4.2-6); however, this increase was accounted for in the previous health risk assessment, which used conservative site conditions. Additionally, since certification of the Expansion EIR, approximately 70% of El Sobrante's heavy equipment has been upgraded, and close to two-thirds of the equipment now meets Tier II or Tier III emission standards set by the SCAQMD. The upgraded equipment on-site would serve to reduce the amount of diesel-fired particulate exhaust generated from landfill operations. Therefore, implementation of the proposed Project would not result in the exposure of sensitive receptors to substantial air pollutants.

4.2.3.3 Global Climate Change (Threshold 3)

Due to the global nature of climate change, it is unlikely that GHG emissions resulting from any single project would have a measurable impact on the extent of overall climate change effects. Instead, GHG emissions from the proposed Project would combine with those emitted across California, the United States, and the world, to cumulatively contribute to GCC.

Although CEQA does not require a lead agency to establish significance thresholds for GHG, the absence of an adopted threshold does not relieve the agency from the obligation to address project GHG emissions and determine impact significance. CEQA Guidelines § 15064(b) states: "*The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved. This judgment must, however, be based on scientific information and other factual data to the extent possible.*" The RCWMD has determined that the proposed project will not have a significant direct effect on global warming/climate change on the basis of the following facts and considerations:

1. Emissions from the landfill were estimated by Urban Crossroads consistent with the methodology used for calculating criteria pollutant emissions. Table 4.2-7, *Current 20-Hour Operation Vehicle and Equipment Greenhouse Gas Emissions by Process (Metric Tons per Year)*, shows the existing CO_2 equivalents based on IPCC Global Warming

Potential Values, and are expressed as total tons of Project-related emissions. As shown, it is estimated that the El Sobrante Landfill generates approximately 0.0128 Teragrams (Tg) of CO_2 equivalent (Eq.) in the existing condition.[6] The proposed Project would result in approximately 0.0148 Tg CO_2 Eq., which represents approximately 0.00259% and 0.003% respectively of California's 2004 total CO_2 emissions. This incremental increase in CO_2 Eq. related to the proposed Project is an increase of less than one-thousandth of a percent when compared to California's existing CO_2 emissions.

2. California's municipal solid waste (MSW) landfills' overall contribution to global warming is much less than what is suggested in terms of their CH_4 generation capacity, because the majority of the CH_4 generated within these highly regulated disposal facilities of today is typically collected and then destroyed either through combustion in a flare station or gas-to-electricity facility, or through conversion into an alternative fuel, such as propane or compressed natural gas (CNG), which will eventually be consumed in combustion engines. The combustion process oxidizes the CH_4 into CO_2, thus effectively reducing the global warming effect of landfill gas by a factor of 21, because methane is at least 21 times more potent than carbon dioxide in its ability to trap infrared radiation, or heat energy, in the atmosphere, causing the Earth's average temperature to increase, that is, global warming. For this reason, the CA Registry fully supports capturing methane that would otherwise escape from the landfills and then combusting it with a flare or utilizing it as a fuel on-site as a direct GHG emission reduction activity by a landfill operator.[7]

3. The process of capturing and combusting landfill gas converts the majority of a landfill's anthropogenic CH_4 generation from bio-degradation of organic waste into biogenic CO_2 emissions, and thus the LFG control system is an effective mitigation measure for the landfills' potential global warming impact. It should be noted that biogenic CO_2 emissions do not represent a net increase in atmospheric carbon dioxide, because they are theoretically equivalent to the carbon dioxide absorbed during plant growth, and thus accounted for in the atmospheric CO_2 flux.[8] In other words, biogenic CO_2 emission, whether it be a component of the landfill gas, or derived from CH_4 combustion with a flare or oxidation in the landfill cover, is part of the natural carbon cycle.

4. The El Sobrante Landfill is equipped with a landfill gas control system, which will be extended into all future landfill phases. Specifically, the bottom liner leachate collection system will be designed and constructed with the capability of LFG collection for protection against gas escaping through liner anchor trenches. Moreover, horizontal and variable depth vertical gas wells will be laid out within the growing waste mass above the liner to form a three dimensional gas collection matrix (i.e., integrated radii of influence of the gas collectors) that can maximize gas collection and minimize surface emissions.

5. As the daily refuse disposal tonnage gradually increases, refuse compaction efficiency will improve due to improved surface area to volume ratio of the landfill cell configuration. A higher refuse density may slow down the decomposition of organic

[6] See note for Table 4.2-7.

[7] California Climate Action Registry, "Landfill Project Protocol Development, November 2007

[8] Staff Report, California 1990 GHG Emissions Level and 2020 Emissions Limit, approved by the CARB on December 6, 2007

waste, which will then decrease landfill gas generation. In addition, the increasing density of the landfill mass will increasingly impede landfill gas migration toward the surface, thus increasing further the possibility of its being captured by the gas control system. In combination with the impermeable bottom liner and protective intermediate cover, these landfill interior conditions are conducive to the retention of methane gas in the interior of the landfill.

6. The El Sobrante Landfill is closed in phases further reducing potential surface emissions of GHG.

As concluded in a study by Weitz et al published in the Journal of the Air & Waste Management Association, Volume 52, September 2002, technological advancements, environmental regulations, and emphasis on resource conservation and recovery have greatly reduced the environmental impacts of MSW management, including emissions of GHGs. The study used a life-cycle methodology to track changes in GHG emissions from 1974 through 1997 from the management of MSW in the U.S. and found that GHG emissions had fallen from the estimated 36 $MMTCO_2E$ in 1974 to 8 $MMTCO_2E$ in 1997, despite an almost 2-fold increase in waste generation. The GHG emissions reduction effect of MSW management in California would have been even more pronounced in light of the enactment and implementation of the Integrated Waste Management Act of 1989 (AB 939 *et seq.*).

Although the RCWMD has determined that the Project will not have a significant cumulative impact on global warming, the El Sobrante Landfill will continue to adhere to the following GHG emission reduction strategies:

- The landfill gas control system will be extended into each phase of landfill development at an early stage and, at a minimum, will consist of horizontal and variable depth vertical gas collectors, looped piping, and lateral connections to the leachate collection and disposal system.

- Any upgrades to the landfill gas disposal system, from flare to gas-to-energy facility, will implement the latest flare and micro-turbine generator technology and shall comply with State and SCAQMD requirements.

- If necessary, the frequency of surface emissions monitoring (SEM) and peripheral landfill gas migration monitoring will be increased to fine tune the landfill gas control system and to maximize and maintain gas collection and disposal efficiency.

- The operator will implement strategies to comply with the CIWMB directive, pursuant to AB 32, to reduce organics in the landfill by 50 percent by 2020.

- The operator will implement practices to maximize waste compaction and increase density.

- The operator will implement Best Management Practices to prevent surface erosion of intermediate landfill cover.

Table 4.2-7 Current 20-Hour Operation and Proposed 24-Hour Operation Vehicle and Equipment Greenhouse Gas Emissions by Process (Metric Tons per Year)

Scenario	Process	CO_2	CH_4	N_2O
Current 20-Hour Operations	Waste Processing	6,387.75	0.69	0.17
	Soil Cover	1,804.06	0.18	0.05
	Green Waste Processing	603.43	0.06	0.02
	Misc. Tasks and Equipment	583.60	0.09	0.02
	Equipment Maintenance	1,043.80	0.10	0.03
	Worker Commute	1,992.64	Negligible	
	Total	12,415.27	1.11	0.27
	Total (Teragrams CO_2 Equivalent)	0.0128		
Proposed 24-Hour Operations	Waste Processing	7,669.78	0.83	0.20
	Soil Cover	1,794.16	0.17	0.05
	Green Waste Processing	568.83	0.06	0.01
	Misc. Tasks and Equipment	645.95	0.10	0.02
	Equipment Maintenance	1,436.63	0.14	0.04
	Worker Commute	2,245.67	Negligible	
	Total	14,361.01	0.32	0.32
	Total (Teragrams CO_2 Equivalent)	0.0148		
	Net Difference in Emissions	**1,945.73**	**0.18**	**0.04**

Note: GHG emissions estimates for the proposed Project are limited to emissions generated by equipment used on-site and during the processing of waste. The GHG emissions estimates do not include methane generated from landfill waste that is subsequently destroyed/converted by the flare or LFG collection system, as the Project would only change the hourly distribution of when waste material is brought to the landfill and processed and would not result in changes to the amount of waste processed at the landfill or to the amount of energy generated by the on-site LFG facility. However, it is not anticipated that the landfill generates substantial amounts of methane emissions, as the flare and LFG collection system is estimated to have a 99-percent destruction efficiency.
Source: Urban Crossroads, Inc. Hand Calcs, 2008.

4.2.3.4 Odors (Threshold 4)

The Expansion EIR evaluated odors at the El Sobrante Landfill site and concluded that with the incorporation of mitigation measures provided within the MMP relative to landfill gas collection, impacts would be less than significant. The proposed Project would not allow additional waste beyond what is permitted to be deposited at the landfill on a weekly basis and identified mitigation measures would continue to be implemented. Therefore, impacts would remain less than significant.

4.2.3.5 Air Quality Management Plan Consistency (Threshold 5)

The proposed Project is consistent with the land uses designated within the current Riverside County General Plan, which the SCAQMD relied upon for their modeling of the adopted State Implementation Plan (SIP) for the District. As such, because the Project would not result in any changes to the land uses that occur on the Project site, a significant impact would not occur.

4.2.4 Cumulative Impact Analysis

Cumulative impacts refer to the incremental effect of several projects that may have an individually minor, but collectively significant impact on air quality. Therefore, any project subject to CEQA

within the jurisdiction of the SCAQMD that results in an increase in air pollutant emissions above those assumed in regional air quality plans would contribute to a cumulative air quality impact.

The proposed Project, which involves extending the hours of waste acceptance and considering maximum amount of permitted waste on a weekly basis, as opposed to a daily basis, does not propose any construction activities and a short-term cumulative air quality impact would not occur. Additionally, as shown on Table 4.2-6, the Project would not exceed daily thresholds established by the SCAQMD for VOCs, CO, or SO_x and as such, a cumulative impact would not occur.

As discussed above under Threshold 1, although implementation of the revised SWFP proposed by the Project would not result in any exceedances of NOx, PM_{10}, or $PM_{2.5}$, when considered in the context of existing landfill emissions, the landfill would exceed the SCAQMD thresholds for these criteria pollutants. However, as indicated in the above analysis, required compliance with Mitigation Measures AQ-1 through AQ-14 from the MMP would reduce Project emissions relative to the baseline condition established prior to the landfill expansion in 1998. Because these mitigation requirements would continue to be enforced, implementation of the proposed Project would not result in a cumulatively significant impact for these criteria pollutants.

Lastly, as discussed in Section 4.5, *Transportation and Traffic*, the Project would result in a reduction of trips during peak hours, which would also result in a reduction to any potential cumulatively significant air quality impacts associated with CO hotspots within the Project vicinity.

4.2.5 Significance of Impacts Prior to Mitigation

With incorporation of the mitigation measures identified in the MMP, the proposed Project would not exceed SCAQMD's regional or localized thresholds and impacts would be less than significant.

ERFs, which were discussed in the Expansion EIR, would continue to operate and reduce the amount of air pollutants that could affect sensitive receptors, thereby reducing odor impacts to a level below significance.

The proposed Project would not alter air movement, moisture, temperature, or cause any change in climate. Also, the Project was found not to contribute substantially to global climate change because the Project-attributable in CO_2 Eq was less than one-thousandth of one-percent.

The proposed Project would not increase the amount of waste received and processed on a weekly basis and because the Expansion EIR determined odors were not a significant issue, the proposed Project would not result in a significant impact on odor emissions.

The land uses in the County General Plan have been included in the modeling of the adopted SIP for the SCAQMD. Therefore, as the Project would not modify the existing land uses, an impact would not occur.

4.2.6 Mitigation Measures

Many of the mitigation measures required by the Expansion EIR and MMP have been implemented and continue to remain in effect with approval of the proposed Project (refer to SEIR Table S-1). As indicated in the above analysis, no impacts have been identified in association with the proposed Project, and additional mitigation is therefore not necessary.

4.3 Noise

A Noise Analysis was prepared for the Project by Urban Crossroads, dated April 16, 2008, and a subsequent addendum to the Noise Analysis was prepared for the Project by Urban Crossroads, dated February 10, 2009. ~~A c~~Copies~~y~~ of the technical report and the addendum letter are~~is~~ included as Appendix C and Appendix C1 to this SEIR, respectively. Noise conditions at the El Sobrante Landfill facility were evaluated in the Expansion EIR, which determined noise impacts to be less than significant. While mitigation measures were provided to reduce potentially significant on-site noise levels in the short-term, Project-related operational noise impacts were found to be less than significant without mitigation.

This analysis is limited to the discussion of significant impacts that could result from revising: (1) the SWFP to permit waste delivery between the hours of 12:00 Midnight and 4:00AM; and (2) the accepted waste amounts from a daily to a weekly limit, without changing the total amount of waste allowed per week. For a complete description of the proposed Project, see Chapter 3.0 of this SEIR. A list of all mitigation measures related to noise is provided in SEIR Table S-1, *MMP*. All mitigation measures previously identified for noise would continue to be implemented as part of the proposed Project.

4.3.1 Existing Conditions

4.3.1.1 Noise Definitions

Noise is generally defined as unwanted or annoying sound that is typically associated with human activity and which interferes with or disrupts normal activities. Although exposure to high noise levels has been demonstrated to cause hearing loss, the principal human response to environmental noise is annoyance. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). The minimum change in sound level that the human ear can detect is approximately 3 dB. A change in sound level of 10 dB is usually perceived by the average person as a doubling (or halving) of the sound's loudness. A-weighted decibels (dBA CNEL) approximate the subjective response of the human ear to broad frequency noise sources by discriminating against very low and very high frequencies of the audible spectrum.

Most environmental noise includes a conglomeration of sounds from distant sources that create a relatively steady background noise in which no particular source is identifiable. For this type of noise, a single descriptor called the "Leq" (or equivalent sound level) is used. Leq is the energy-mean A-weighted sound level during a measured time interval. It is the equivalent constant sound level that would have to be produced by a given source to equal the average of the fluctuating level measured. The monitoring interval is generally described as on-hour, and is abbreviated as "Leq-h."

4.3.1.2 Regulatory Requirements

The County has identified two (2) separate types of noise sources: (1) transportation, and (2) stationary. For the purposes of this subchapter, the noise impacts associated with the operation of the El Sobrante Landfill are governed by the County noise ordinance standards for stationary noise sources and related off-site truck traffic noise impacts are subject to the County's noise standards for transportation noise. The County's standards include the following:

- ❑ Transportation Noise Standards
  - Require development that generates increased traffic and subsequent increases in the ambient noise level adjacent to noise sensitive land uses to provide for appropriate mitigation measures (the County requires exterior living areas should remain under 65dBA CNEL and interior living areas must be below 45 dBA CNEL).

- ❑ Stationary Noise Sources Standards
  - Prohibit facility-related noise, received by any sensitive use, from exceeding the following worst-case noise levels: 45dBA– 10-minute Leq between 10:00PM and 7:00AM and 65 dBA (10-minute) Leq between 7:00AM and 10:00PM.
  - Develop measures to control non-transportation noise impacts.
  - Ensure any use determined to be a potential generator of significant stationary noise impacts be properly analyzed and ensure that the recommended mitigation measures implemented.
  - Encourage major stationary noise-generating sources throughout the County to install additional noise buffering or reduction mechanisms to reduce noise levels to the lowest extent practicable prior to the renewal of Conditional Use Permits or business licenses or prior to the approval and/or issuance of new Conditional Use Permits for said facilities.

4.3.1.3 Existing Ambient Noise Levels

Existing noise conditions near the El Sobrante Landfill site were measured using six (6) 10-minute, and three (3) 24-hour noise level measurements, based on the Project's potential noise impact and the location of the nearest noise sensitive locations. The locations of the nine (9) monitoring stations are illustrated on Figure 4.3-1, *Noise Monitoring Locations*. The six (6) short-term measurements were taken in the vicinity of the El Sobrante Landfill along Dawson Canyon Road, Clay Canyon Drive, and Temescal Canyon Road. The three (3) long-term measurements were taken at the nearest noise sensitive residences southeast of the landfill, 100 feet north of the Clay Canyon Drive centerline and 100 feet west of the El Sobrante access road centerline, south of the landfill facility. The noise measurements were recorded February 5-6, 2008 during normal conditions. The results of the sound level monitoring are shown below in Table 4.3-1, *Measured Existing Short-Term Noise Levels*, and Table 4.3-2, *Measured Existing Long-Term Noise Levels*.

4.3.2 Basis for Determining Significance

The proposed Project would result in a significant impact to noise if any of the following would occur as a result of a Project-related component:

1. *A substantial increase in noise levels.*

2. *Exposure of sensitive receptors to severe noise levels.*

(Source: El Sobrante Landfill SWFP Revision Project Initial Study; August 9, 2007)

Figure 4.3-1 Noise Monitoring Locations

Table 4.3-1 Measured Existing Short-Term Noise Levels

Observed Location	Description	Primary Noise Source	Noise Levels (dBA)
1	Located near a gas station 100 feet from the centerline of Temescal Canyon Road, east of the I-15 Freeway.	Traffic on Temescal Canyon Road, I-15 Freeway	65.2
2	Located at the noise sensitive residences at the terminus of Dawson Canyon Road east of the El Sobrante Landfill.	Ambient Noise	38.1
3	Located at the nearest noise sensitive residences to the south of the El Sobrante Landfill.	Ambient Noise	45.0
4	Located near the motocross track at the intersection of Dawson Canyon Road and Clay Canyon Drive.	Motorcycles at the motocross track	69.0
5	Located 100 feet west of the El Sobrante Access centerline south of the landfill facility.	Traffic on the El Sobrante Access Road.	60.4
6	Located near 100 feet south of the El Sobrante Access Road near the landfill gas entrance gates.	Traffic on the El Sobrante Access Road.	64.9

Source: Urban Crossroads, 2008.

Table 4.3-2 Measured Existing Long-Term Noise Levels

Observed Location	Description	Primary Noise Source	Daytime Noise Level (Leq dBA) 7AM – 7PM	Nighttime Noise Level (Leq dBA) 7PM – 7 AM
A	Located at the nearest noise sensitive residences to the south of the El Sobrante Landfill.	Ambient Noise	47.1 - 51.1~~52.3 - 56.1~~	47.9 - 50.5~~50.0 - 58.1~~
B	Located 100 feet north of the Clay Canyon Drive centerline near the existing cement piping factory.	Traffic on Clay Canyon Drive and operations at the cement piping factory.	52.3 - 56.1~~47.1 - 51.1~~	50.0 - 58.1~~47.9 - 50.5~~
C	Located 100 feet west of the El Sobrante Access centerline south of the landfill facility.	Traffic on the El Sobrante Access Road	53.7 - 61.5	50.4 - 60.3

Source: Urban Crossroads, 2009~~8~~.

4.3.3 Impact Analysis

4.3.3.1 No Impacts/Less Than Significant Impacts

Issue No. 1: ***Would the Project result in a substantial increase in noise levels?***

Issue No. 2: ***Would the Project result in the exposure of sensitive receptors to severe noise levels?***

The term "sensitive receptors" refers to land uses that would be affected by an increase in noise levels. These include such land uses as schools, parks, churches, residences and other land uses that typically do not generate significant noise levels. As shown on Figure 2-6 of this SEIR, surrounding land uses immediately adjacent to the landfill include commercial, industrial and rural residential uses. Accordingly, the only sensitive receptors evaluated for this SEIR are the nine (9) rural residences within Dawson Canyon, located approximately 3,600 feet south of the Project site.

- **On-Site Landfill Operations (12:00 Midnight – 4:00AM)**

The noise sensitive uses nearest to the Project site are the rural single family homes located in Dawson Canyon, approximately 3,600 feet south of the site. These homes are located within the Canyon and have their line of sight to the Landfill obstructed by rolling hills that reach up to 500 feet above the Canyon floor. These intervening hills serve as natural noise barriers and attenuate noise levels generated at the site. As depicted in Table 4.3-3, *Project Noise Contributions (12:00 Midnight – 4:00AM),* when intervening topography and geometric spreading (*i.e.*, the dissipation of the intensity of noise over a distance) are taken into consideration, the Project site would emit noise levels of approximately 40.0 dBA CNEL at the Dawson Canyon rural residences.

As shown below in Table 4.3-3, *Project Noise Contributions (12:00 Midnight – 4:00AM),* when combined with existing ambient noise levels, the proposed Project would result in exterior noise levels of approximately 48.6~~52.4~~ dBA CNEL at the Dawson Canyon rural residences, referred to as Location "A," between the hours of 12:00 Midnight and 4:00AM. As shown above in Table 4.3-2, the existing noise levels at Location "A" range from 47.9 to 50.5~~50.0 to 58.1~~ dBA CNEL without the proposed Project. As such, the Project would result in an increase of no more than 0.7~~2.4~~ dBA CNEL. An increase in noise levels of less than three (3) dBA CNEL is considered "barely perceptible," and as such, a substantial increase in noise levels would not occur with implementation of the proposed Project. ~~Additionally, the homes at Location "A" are located in a canyon surrounded by rolling hills that reach up to 500 feet above the canyon floor, further reducing estimated noise levels due to intervening topographic features.~~

Existing primary noise sources occurring at the noise measurement locations are provided within Table 4.3-1 and Table 4.3-2. As shown, the majority noise sources in surrounding areas include traffic noise from the I-15 freeway (65.2 dBA), motorcycles at the motocross track (69.0 dBA), and operations at the cement piping factory (65.2 dBA). Due to distance and intervening topography, activities occurring at the El Sobrante Landfill site, which would result in exterior noise levels of 48.6 dBA, could not be heard at any of the noise measurement locations and impacts would be less than significant.

- **Off-Site Vehicle Operations**

A truck passing by can generate up to 76.0 dBA at 50 feet, however these noise levels reduce at a rate of approximately 7.5 dBA for every doubling of distance, excluding any intervening topography. As determined in the Project-specific noise study, a truck traveling to the landfill site would result in

noise levels of up to 29.6 dBA within the vicinity of the rural residences in Dawson Canyon, which is below County standards of 65 dBA and 45 dBA for both exterior and interior noise levels, respectively. When compared to the existing ambient noise levels measured in the vicinity of these homes, which is approximately 38.1 to 45.0 dBA, Project-related truck traffic would not result in any substantial increase in ambient noise levels for any noise-sensitive land uses within the study area.

Table 4.3-3 Project Noise Contributions (12:00 Midnight – 4:00AM)

Location	Condition	Exterior Noise Levels (Leq dBA)
A	Project Only Noise Total	40.0~~8.6~~
	Existing Ambient Noise Level	47.9~~50.0~~
	Combined Project & Ambient Noise Level	48.6~~52.4~~
	Project Contribution	**0.7~~2.4~~**
County of Riverside Nighttime Residential Noise Standard		45.0

Source: Urban Crossroads, 2009~~8~~.

4.3.4 Cumulative Impact Analysis

Projects included in the evaluation of cumulative impacts relative to noise are based on existing and planned developments surrounding the El Sobrante Landfill site, as provided within Table 2-7, *Past, Present, and Future Projects*. Noise monitoring locations as shown on Figure 4.3-1, which were established based on the Project's potential noise impact and the location of the nearest sensitive land uses, also are considered. The Project site is mostly surrounded by industrial and commercial land uses, which are not considered sensitive land uses; however, nine (9) rural residences are located directly south of the Project site, which are considered sensitive noise receptors.

Project-related automobile and truck traffic experienced at the landfill were calculated to verify the noise impacts resulting from operations extending to a continuous, 24-hour period, seven (7) days per week. As the Project does not include altering or increasing the currently approved and permitted maximum of 1,305 daily inbound trips, the proposed change in hours of operation would shift Project-related traffic to off-peak times in the late evening and/or early morning, reducing the Project's cumulative contribution to off-site areas when compared to existing operational characteristics.

Additionally, the majority of the roads where the Project could potentially contribute to a cumulative noise impact (i.e., Dawson Canyon Road) include roadways that would not be used by most of the surrounding land uses, especially between the hours of 12:00 Midnight and 4:00AM. The one exception is the nine (9) rural residences along Dawson Canyon Road, located south of the landfill. As described in the above analysis, traffic noise associated with the proposed Project would result in a worst-case noise level increase of 0.7~~2.4~~ dBA CNEL at the homes along Dawson Canyon Road. To be considered a significant impact, the Project traffic must create a noise level increase in the area adjacent to the roadway segment of greater than 3.0 dBA CNEL, and the resulting noise level must exceed the County's 65 dBA CNEL exterior standard; therefore, the proposed Project's noise level contributions, when considered with noises from surrounding land uses, would not result in significant impacts to the existing or future sensitive noise receptors identified in the Project area.

4.3.5 Significance of Impacts Prior to Mitigation

The proposed Project would result in the addition of approximately 0.7~~2.4~~ dBA CNEL, which is considered less than "barely perceptible" and as such, the Project would not result in a substantial increase in noise levels.

The nearest sensitive land uses, located south of the Project within Dawson Canyon, would not be exposed to significant increases in noise levels and as such, sensitive receptors would not be impacted by the proposed Project.

4.3.6 Mitigation Measures

Many of the mitigation measures required by the Expansion EIR and MMP have been implemented, although some mitigation measures would continue to be enforced (refer to Table S-1 for a summary of mitigation measures for Noise that would remain in effect with approval of the proposed Project). As indicated in the above analysis, no impacts have been identified in association with the proposed Project, and additional mitigation is therefore not necessary.

4.4 Public Health and Safety

This section focuses on public health and safety concerns associated with landfill operations including potential impacts related to hazardous substances (i.e., landfill gas, leachate, and hazardous waste), public health risks attributed to vectors (i.e., organisms that are capable of carrying disease such as mosquitoes, flies, ticks, rats, mice and birds), fire hazards, personnel safety, and the Project's compatibility with emergency response and evacuation plans. In addition, operations at the landfill are controlled by the JTD, which is described in SEIR Section 2.4.

4.4.1 Existing Conditions

Current health and safety requirements and conditions at the El Sobrante Landfill site are presented and detailed in the following documents: MMP, provided as SEIR Table S-1; the existing, approved SWFP; and the Second Agreement, including the first and second amendments thereto. It should be noted that mitigation measures identified in the Expansion EIR and MMP pertaining to health and safety have either since been implemented or would continue to be enforced upon implementation of the proposed Project. In addition, operations at the landfill are controlled by the JTD, which is described in SEIR Section 2.4.

4.4.1.1 Hazardous Substances

The following provides a summary of existing hazardous substances which have previously been disclosed as part of the 1998 Final EIR.

- **Landfill Gas**

The decomposition of waste in a landfill typically occurs under anaerobic conditions or in the absence of oxygen because of the landfill's containment properties. As such, the result is the generation of carbon dioxide, methane, and small quantities of trace gases that over time build up pressure within the landfill and ultimately migrate to the atmosphere through the porous soils surrounding the limits of the landfill site. Human health would be compromised should these gases accumulate and reach combustible levels in confined spaces above and surrounding the landfill site, such as on-site buildings and off-site residential homes. Federal and state regulatory requirements exist for the safe construction of landfills to address the management of such gases to reduce public health and safety concerns related to landfill gases to a level below significance. Such requirements include the application of a multi-layer and impermeable bottom liner and cover upon closure of the landfill, as well as the installation of gas recovery or collection systems, and methane monitoring programs.

Landfill gas collectors, also referred to as "vertical or horizontal collectors," have been and continue to be installed at the El Sobrante Landfill as compacted lifts of waste are finished. These collectors are then used to extract landfill gas. The collectors are used as a compliance measure to collect any newly generated gas and prevent free venting from the working face, as required per Mitigation Measure W-9 of the MMP. The El Sobrante Landfill then transforms methane gas into electricity by capturing landfill methane gas and feeding it directly to the local power grid. Mitigation Measure W-11 from the MMP also has been implemented, which requires regular monitoring of landfill gas along the landfill perimeter to identify and address undesirable leakage of landfill gases into the atmosphere.

❑ Leachate

Leachate refers to a liquid that can be generated either by the percolation of water through solid waste or from the decomposition or release of liquids from the waste. The generation of leachate is the result of precipitation percolating through waste deposited in a landfill site, which could potentially contaminate groundwater resources and result in public health concerns. State regulations require that the landfill operator must monitor, collect, treat and dispose of leachate for a minimum of 30 years and until the CIWMB, Regional Water Quality Control Board (RWQCB), and the LEA, determine that leachate is not being produced and would not impact groundwater resources.

All landfill cells at El Sobrante Landfill are lined with a redundant synthetic system design to collect any leachate that may have come in contact with disposed waste. The multiple liner system provided at the landfill exceeds federal standards for landfills and generally consists of the following: one-foot of compacted clay, a 40-milimeter high-density polyethylene (HDPE) liner, a geosynthetic liner, a 60-milimeter HDPE liner, a woven geotextile, a 12-inch layer of leachate collection gravel, a non-woven geotextile, and a 24-inch thick operations layer.

Furthermore, as required by Mitigation Measure W-4 in the MMP, a Leachate Collection and Removal System (LRCS) has been implemented prior to the development of each phase of the landfill (i.e., before any waste processing), and future phases of the landfill operations would continue to be subject to this requirement. The LCRS is designed to safely remove leachate from the drainage layer underlying waste areas as quickly as possible and dispose of it through evaporation or re-circulation into the landfill. Since the approval of the Expansion EIR, leachate conditions at the El Sobrante Landfill have been sampled and reported on an annual basis.

❑ Hazardous Waste

The El Sobrante Landfill SWFP identifies hazardous wastes as, "radioactive, medical (as defined in Chapter 6.1, Division 20 of the Health and Safety Code), liquid, designated sewage sludge in any form, incinerator ash or other wastes requiring special treatment or handling, except as identified in the JTD and as approved by the enforcement agency and other federal, state and local agencies." Hazardous waste could create health and safety risks for landfill employees and customers if deposited at the El Sobrante Landfill.

The El Sobrante Landfill site does not accept hazardous wastes and operates in accordance with the County's Landfill Load Check Program (LCP) for the screening of incoming waste, as required by the El Sobrante Landfill SWFP. This program, along with the Hazardous Waste Spill Contingency Plan (HWSCP), required by CCR Title 22, §66265.50 to §66265.56, is implemented by trained County personnel and designed to control and prevent the improper disposal of household or other hazardous waste by landfill patrons and to safely respond to spills. Results of the hazardous waste LCP, including the quantities and types of hazardous wastes, medical wastes, or otherwise prohibited wastes, are self-monitored and reported to the RCDEH on a quarterly basis, in compliance with the conditions of the SWFP. The SWFP also requires that operations at the landfill comply with the State's Minimum Standards for solid waste handling and disposal, as specified in Title 27 of the CCR.

4.4.1.2 *Vector Controls*

Vectors are defined as organisms that spread infections, which can result in adverse effects to human health if potential vector breeding sources are not identified or managed properly. Primary vectors

identified for the El Sobrante Landfill include birds (primarily seagulls), mosquitoes, flies, ticks, rats and mice. Measures identified in the JTD to control potential vector problems include;

- Control of the size of the working face;
- Litter containment and removal;
- Application of daily cover;
- Use of a bird grid wire, as necessary;
- Not using building materials, concrete or other wastes that might furnish habitat for rodents or material cover;
- Regular inspection around the working face and buildings for signs of vector activity;
- Limit areas of ponded water at the site.

Mitigation Measure A-7 in the MMP requires the preparation of a litter removal plan to manage litter and debris from landfill-related activities and/or illegal disposal activities and imposes those measures as requirements in the JTD. Subsequently, the Second Agreement increased the scope of off-site litter removal required by the JTD to include areas along the landfill access road to its intersection with Temescal Canyon Road and along Temescal Canyon Road from its intersection with I-15 and to the intersection with Weirick Road.

4.4.1.3 *Personnel Safety Controls*

Landfill operations involve the operation of heavy machinery over long periods of time and the flow of large waste hauling vehicles on a daily basis. Safety hazards and risks typically associated with landfill operations include human contact with hazardous waste, safety risks associated with the operation of large and heavy equipment, and other unsafe conditions occurring during non-daylight hours and adverse weather conditions. As a safety precaution, public access to the landfill is restricted to the hours of 6:00 AM to 6:00 PM.

Safety measures for on-site personnel have been implemented as part of the JTD to reduce the potential for significant risks to health and safety resulting from the exposure of hazardous substances. Likewise, Mitigation Measure U-1 required that access roads leading to the landfill site be constructed wide enough to accommodate movement and parking without hindering the flow of traffic. Signage is located along Temescal Canyon Road and the landfill access road to remind drivers of the presence of slow-moving vehicles, which is required by Mitigation Measure U-2. Mitigation Measures U-1 and U-2 have since been implemented.

Additionally, Mitigation Measure U-7 requires landfill equipment operators, waste transfer drivers, and landfill personnel to have completed training for the operation of heavy equipment during non-daylight hours and poor weather conditions. As such, the landfill conducts weekly safety training sessions and yearly critical operational training for all operation and maintenance employees. Current conditions at the landfill site include lighting at the scales, maintenance facility, administration building, flare station, crew quarters, and at the working face of the landfill, as required by Mitigation Measure U-8. All landfill equipment and waste transfer trucks are equipped with headlights and portable lighting devices and landfill access roads are equipped with reflectors, reflective cones and reflective signs and barriers, in compliance with Mitigation Measure U-9.

4.4.1.4 *Emergency Response Plans*

An emergency is an unexpected event, including both natural and man-made events that present an immediate risk to health, life, or property. In order to safely respond to an emergency situation, a set of procedures specific to particular types of emergencies is necessary.

A Health and Safety Plan for the landfill, approved by the California Occupational Safety and Health Administration (Cal-OSHA) and provided as an Appendix to the JTD, contains facility-specific information to safely manage emergency and unsafe situations. Procedures to follow during fires, bomb threats, earthquakes, floods, tornadoes, and personal medical emergencies are provided in the Health and Safety Plan, as well as protective measures specific to individual jobs performed at the landfill site. The SWFP requires that all unsafe occurrences such as fires, explosions, the discharge of hazardous wastes, and significant injuries, accidents, or damage to property are documented and reported to the RCDEH on a quarterly basis. The El Sobrante Landfill facility has not had any recent Cal-OSHA recordable incidents.

4.4.1.5 *Fire Hazard Controls*

Southern California is a region prone to wildfires resulting from Santa Ana winds that push out maritime moisture and create dry vegetative conditions, most of which is native low-lying brush (i.e., chaparral). The El Sobrante Landfill site is located within a high fire hazard area of the County and is classified as a Category ~~II~~ III project, which requires a fire station within three (3) miles or a 12-minute response time. As such, buildings on-site were required to be constructed in compliance with County Ordinance No. 546, which required special construction provisions relative to fire safety. Mitigation Measures U-4 and U-5 in the MMP required all buildings within the landfill site to be constructed with fire retardant roofing materials approved by the County Fire Department, and further required that water mains and fire hydrants accommodate fire flows in accordance with the County Fire Department requirements.

Additionally, a Fire Management Plan has been prepared for the landfill, which adopts many of the fire management areas identified in surrounding areas (i.e., the Lake Mathews preserve) and addresses fire safety concerns for adjacent open space areas, as required by Mitigation Measure U-6 from the MMP.

4.4.2 Basis for Determining Significance

The proposed Project would result in a significant impact to Public Health and Safety if any of the following would occur:

1. *A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals, or radiation).*

2. *The creation of any health nuisances or potential health hazards, such as litter and vector problems.*

3. *Possible interference with an emergency response plan or emergency evacuation plan.*

4. *Increased fire hazard in areas with flammable brush, grass, or trees.*

(Source: El Sobrante Landfill SWFP Revision Project Initial Study; August 9, 2007)

4.4.3 Impact Analysis

4.4.3.1 *No Impacts/Less Than Significant Impacts*

Issue No. 1: ***Would the Project result in a risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals, or radiation)?***

While the proposed Project would not result in an increase in tonnage above the permitted 70,000 tpw, the Project could result in an increase in daily tonnage above existing levels (10,000 tpd). This would then increase the volume of waste received on a daily basis. However, increases in leachate, hazardous substances, and the generation of gas at the landfill are not anticipated to occur with the proposed SWFP revisions because these risks are associated with long-term maintenance of the landfill areas, and daily increases in the amount of waste deposited at the landfill would not result in an increase in any of these adverse conditions. Moreover, landfill gas collection systems designed for the collection of gas already are in place and a methane gas monitoring program has been implemented. As such, any unanticipated increased risk of an accidental explosion of such gases would be identified and remediated as part of the on-going monitoring efforts. Additionally, as described in subsection 4.4.1.1, measures are in place to respond to the potential release of leachate and exposure to hazardous waste, and these measures are adequate to address conditions under the proposed modified SWFP. As such, impacts related to accidental explosion or release of hazardous substances would not increase with Project implementation, and impacts are evaluated as less than significant.

Issue No. 2: ***Would the Project result in the creation of any health nuisances or potential health hazards, such as litter and vector problems?***

The Project would change the maximum disposal tonnage limits from a daily limit to a weekly limit; however, the Project would not exceed the 70,000 tpw of waste that is allowed under the current SWFP. Given that weekly volumes of waste would remain unchanged, implementation of the proposed Project is not anticipated to increase any health nuisances or potential health hazards beyond those that occur under existing conditions. Litter and vector problems were addressed in the previous Expansion EIR, which determined that landfill activities and operations as presented in the JTD would not pose a significant risk to public health and safety.

The Project may also result in the need for additional maintenance vehicles, related landfill equipment, and a corresponding increase in the number of employees to accommodate the waste volumes expected beyond the currently permitted 10,000 tpd. As shown on Table 3-2, *Proposed Daily Personnel*, and Table 3-3, *Proposed Primary and Secondary Landfill Equipment* in Chapter 3.0, the proposed Project may result in an increase of approximately eight (8) landfill employees and a total of 17 machines. Operations under the proposed Project may also increase during non-daylight hours. With the increase in daily tonnage, the increase in people and machines on-site, and an increase in operations during non-daylight hours, a greater number of individuals would be exposed to potential health hazards associated with landfill operations. Nevertheless, this increase in potential health hazards is considered to be nominal for reasons that safety operations and procedures, as well as systems currently in place (i.e., methane monitoring, lighting requirements, litter removal plan, etc.), would continue to be implemented as described in the JTD and enforced per mitigation provided in the MMP. Also, because the general public is not allowed access to the site between the hours of 6:00 AM and 6:00 PM, the additional risk of accidents during non-daylight operations

would not increase. Further, under existing conditions, although the landfill does not accept waste between the hours of midnight and 4:00 am, on-site landfill operations do occur on a 24-hour basis. As such, impacts associated with health hazards resulting from increased operations and personnel are evaluated as a less than significant impact of the proposed Project.

Issue No. 3: ***Would the Project cause possible interference with an emergency response plan or emergency evacuation plan?***

As addressed in the Expansion EIR, the proposed Project would not result in the interference with an emergency response plan or increase fire hazards in areas with flammable brush. While the proposed Project would result in the additional employees and landfill equipment on a daily basis, the El Sobrante Landfill Health and Safety Plan would continue to address emergency issues and protocol in the event that an emergency situation occurs. Although some administrative updates/revisions to the El Sobrante Landfill Health and Safety Plan may be necessary to account for the new shifts and/or positions to accommodate the new employees, revisions to the safety procedures and emergency protocol in the El Sobrante Landfill Health and Safety Plan would not be necessary to continue to provide a safe working environment for landfill employees and customers.

Additionally, the site currently operates on a 24-hour basis processing the deposited waste accepted throughout the day. The proposed Project would not change current working face operations, other than the addition of equipment and personnel for processing the increase in waste expected. Any new equipment operator assigned to the working face would be required to complete appropriate training for nighttime operation of such heavy machinery as currently required. Also, as described above, the facility currently provides on-site lighting for the crews assigned to the working face of the landfill, for the administrative buildings, and at the landfill gate. All access roads and landfill machinery would continue to be equipped with lights for sufficient visibility and safe maneuverability. The lighting needs to accommodate the proposed extension of hours at the gate would not change upon implementation of the proposed Project. Therefore, impacts are evaluated as less than significant.

Issue No. 4: ***Would the proposed Project create an increased fire hazard in areas with flammable brush, grass, or trees?***

As discussed above, the El Sobrante Landfill has implemented a Fire Management Plan to address fire hazards at the site. The modification of landfill operations would be incremental and would not create conflicts with the Fire Management Plan; therefore, any perceived increase in fire hazards for adjacent open space areas is considered less than significant.

4.4.4 Cumulative Impact Analysis

As mentioned above, the El Sobrante Landfill site does not accept hazardous wastes and has operated in accordance with the County's LCP for the screening of incoming waste since the approval of the El Sobrante Landfill SWFP. The SWFP also requires that operations at the landfill comply with the State's Minimum Standards for solid waste handling and disposal, as specified in Title 27 of the CCRs. Because the Project would not result in any changes to these safety conditions and because the Expansion EIR concluded that the landfill would not contribute to a cumulative impact regarding hazardous wastes, the proposed Project also would not contribute to a cumulatively significant impact.

The El Sobrante Landfill site would continue to implement Mitigation Measure A-7 from the MMP, which requires clean up of litter in surrounding off-site areas. Therefore, because the Expansion EIR concluded that the landfill would not contribute to cumulative impacts regarding litter and vector problems, the proposed Project would not contribute to any cumulative impacts regarding litter and vector problems.

Because the Expansion EIR determined that the landfill would not contribute to emergency impacts on a cumulative level, and because the El Sobrante Landfill Health and Safety Plan would continue to address emergency issues and protocol in the event that an emergency situation occurs, the proposed Project would not result in a cumulative impact to an emergency response or evacuation plan.

Lastly, because the proposed Project would not physically modify the existing landfill site, and because the Expansion EIR concluded that the landfill would not result in a significant impact to fire hazards on a Project-specific or cumulative level, the proposed Project also would not result in a significant cumulative impact due to fire hazards.

4.4.5 Significance of Impacts Prior to Mitigation

The proposed Project would have an incremental and less than significant impact on existing health nuisances associated with litter and potential vectors; therefore, no additional mitigation measures beyond those identified in the MMP are required or provided.

The proposed Project would not result in any changes to the existing emergency response plan or emergency evacuation plan for the project site; therefore, no additional mitigation measures beyond those identified in the MMP are required or provided

The proposed Project would not result in an increased fire hazard in areas with flammable brush, grass, or trees; therefore, therefore, no additional mitigation measures beyond those identified in the MMP are required or provided.

4.4.6 Mitigation Measures

Compliance with and implementation of the mitigation measures specified in the MMP (see Table S-1), and compliance with all regulatory safety requirements mandated for the El Sobrante Landfill, would avoid or reduce impacts to public health and safety associated with the proposed Project. Because no new or substantial increase in significant impacts were identified beyond those already disclosed in previous environmental analysis, no new mitigation measures are required.

4.5 Transportation and Circulation

The following analysis is based on the *El Sobrante Landfill Traffic Evaluation*, dated April 8, 2008, and prepared by Urban Crossroads. This report is included in its entirety as Appendix D to this SEIR. Current traffic conditions at the El Sobrante Landfill site are presented in the Expansion EIR, and implementation of mitigation requirements pursuant to the Expansion EIR is documented in the Expansion EIR MMP. It should be noted that any previously identified on-going mitigation measures would continue to be enforced upon implementation of the proposed Project. However, there are former mitigation measures that have since been implemented and are no longer applicable (i.e., road improvements). Table S-1 provides a summary of the mitigation measures that would remain in effect with approval of the proposed Project.

4.5.1 Existing Conditions

4.5.1.1 Site Access

Regional access to the El Sobrante Landfill is provided by the Corona Freeway (I-15) via Temescal Canyon Road. Local access is achieved from either the north or south by a private two-lane paved roadway via Temescal Canyon Road. Figure 4.5-1, *Existing Roadway Configuration*, identifies the current roadway configuration for study area roadways, including the number of through travel lanes for existing roadways and intersections.

4.5.1.2 Existing Circulation Improvements

In support of the Expansion EIR, the County of Riverside Transportation Department issued Conditions of Approval for the expansion of the landfill, based on findings and conclusions determined in a project-specific traffic study. These conditions included the following requirements, which have since been implemented by the Project proponent:

- The addition of traffic signals at the I-15 freeway ramps on Temescal Canyon Road and at the intersection of Temescal Canyon Road and Dawson Canyon Road.
- The widening and the improvement of flood control structures on Dawson Canyon Road.
- The widening and addition of a lane in each direction between the I-15 and Temescal Canyon Road.
- The addition of turn lanes at Dawson Canyon Road and the I-15 freeway northbound on-ramp on Temescal Canyon Road.

4.5.1.3 Waste Delivery Requirements

As required per Mitigation Measure T-1 of the MMP, all waste delivered to the El Sobrante Landfill from areas outside Riverside County is delivered in transfer trucks. Packer trucks may be used for deliveries within Riverside County. Also, per Mitigation Measure T-2, waste is accepted from out-of-County areas, which include only the following counties:

- Los Angeles County
- Orange County
- San Bernardino County
- San Diego County

Figure 4.5-1 Existing Roadway Configuration

4.5.1.4 Existing Traffic Volumes

SEIR Table 2-3 presents vehicle trips to the El Sobrante Landfill collected during an "emergency situation" as a result of the southern California wildfires on October 23, 2007. The data in Table 2-3 represents the most conservative data available and provides for a "worst-case" scenario for existing traffic conditions at the landfill. To determine existing traffic conditions for normal circumstances, the trip distribution was restricted to the parameters of the current SWFP, which allows a maximum of 1,305 daily trips.

- **Average Daily Trips**

Table 4.5-1, *Permitted Traffic Conditions (20-Hour Waste Acceptance),* presents the estimated number of vehicle trips by vehicle type for the AM peak hour (8:00-9:00 AM) and PM peak hour (4:00-5:00 PM) in the event that 1,305 vehicles visit the site within the permitted 20-hour waste acceptance period. As stated in the current SWFP, under no circumstances would the El Sobrante Landfill facility be allowed to accept more than 1,305 vehicles per day. As shown in Table 4.5-1, the landfill does not normally receive more than 114 and 76 vehicle trips in the AM and PM peak hours, respectively.

Table 4.5-1 Permitted Traffic Conditions (20-Hour Waste Acceptance)

Vehicle Type	AM Peak Hour Trips			PM Peak Hour Trips			Total ADT
	In	Out	Total	In	Out	Total	
Passenger Cars	16	11	27	2	3	5	63
Heavy Trucks[1]	98	65	163	74	121	195	1,242
Total	**114**	**76**	**190**	**76**	**124**	**200**	**1,305**

[1] Heavy trucks consist of large vehicles with three (3) or more axles and a length greater than 25 feet.

- **Intersections**

Based on the existing intersection configurations and traffic control devices (i.e., traffic signals, stop signs, etc.) and assuming a two percent growth rate, peak hour traffic operations for 2009 conditions based on the 20-Hour waste acceptance permit were evaluated and are presented in Table 4.5-2, *Permitted Intersection Conditions (2009),* and are shown on Figure 4.5-2, *Permitted Intersection Conditions (2009).* As shown, all study area intersections operate at a level of service (LOS) "C" or better during the peak hours.

Table 4.5-2 Permitted Intersection Conditions (2009)

Intersection	Delay (secs)		Level of Service	
	AM	PM	AM	PM
I-15 Southbound Ramps (NS) at Temescal Canyon Rd. (EW)	23.6	22.2	C	C
I-15 Northbound Ramps (NS) at Temescal Canyon Rd. (EW)	25.0	17.3	C	B
Temescal Canyon Rd (NS) at Dawson Canyon Road (EW)	19.9	19.8	B	B
Clay Canyon Rd. (NS) at Dawson Canyon Rd. (EW)	11.6	12.0	B	B

Source: Urban Crossroads, April 11, 2008.

Figure 4.5-2 Permitted Intersection Conditions (2009)

Table 4.5-3, *Proposed Tonnage and Maximum Daily Trips (24-Hour)*, summarizes the estimated traffic and waste volume data anticipated under the proposed project. The estimates were calculated based on observed traffic data collected during an "emergency situation" resulting from the southern California wildfires on October 23, 2007 (refer to EIR Section 2.4.2). On this date, a total of 837 waste deliveries were recorded at the landfill, with total tonnage of waste estimated at 10,542 tons. Using this information and based on an hourly breakdown of trips observed on an average day at the landfill, the observed data was factored up to achieve a "worst-case" maximum of 1,305 trips to the landfill. The resulting calculation indicates that the maximum volume of trash that could theoretically be accepted at the landfill under the revised SWFP would be 16,054 tons per day. However, as noted above, even under emergency conditions associated with the October 2007 wildfire events, the total tonnage received at the El Sobrante Landfill was estimated at 10,542 tons, indicating that the theoretical maximum daily volume (16,054 tons per day) is highly unlikely; the theoretical maximum daily volume is therefore assumed in this SEIR only to evaluate "worst-case" landfill operating conditions. The Second Amendment further stipulates that the El Sobrante Landfill remain open six (6) days a week to in-County waste, reserving 5,000 tons per day (tpd) on Monday through Friday, 3,000 tpd on Saturdays, and 5,000 tpd on Saturdays following a holiday. Therefore, in the unlikely event that this theoretical maximum daily volume of 16,054 tons per day was to occur multiple times during any given week, USA Waste of California would adjust the incoming out-of-county tonnage to remain in compliance with the Second Agreement and its amendments thereto.

Table 4.5-3 Proposed Tonnage and Maximum Daily Trips (24-Hour)

Vehicle Type	Trips	Maximum Tonnage[1]
Personal Vehicles	264	< 1.3% of total
Commercial Trucks	359	1,795
Transfer Trailers	679	14,259
Transfer Rigs	3	< 0.2% of total
TOTAL	**1,305**	**16,054**

1. "Maximum Tonnage" refers to the theoretical maximum tonnage if the 1,305 daily trips were to be achieved. It should be noted that this tonnage amount is unlikely and is evaluated only to disclose the "worst-case" daily operations at the landfill that could occur under the revised SWFP. Based on records provided by USA Waste, the maximum observed daily volume in 2007 was 10,957 tons, which was the result of emergency conditions created by the October 2007 wildfire conditions.
2. Personal vehicles and transfer rigs account for roughly 1.5% of total maximum tonnage. Therefore, tonnage from these vehicle types are not included in the tonnage estimation.

❑ Freeway Mainlines

Impacts to freeway mainlines, including nearby segments of I-15 and State Route 91 (SR-91), were previously evaluated as part of the Expansion EIR. The analysis was based on a study prepared by Albert Grover and Associates titled, *Traffic Impact Study for El Sobrante Landfill Expansion Plan (Years 1996 to 2001, 10,000 tons per day)*, and dated April 1994. This study demonstrates that, prior to landfill expansion, I-15 was operating at LOS C and A in the peak and off-peak directions, respectively. The study also indicates that SR-91 was operating at a "very congested level during peak periods," implying that SR-91 was not achieving an acceptable level of service. However, the study concludes that the traffic associated with the landfill expansion would "…not significantly impact the I-15 and SR-91 freeways during both am and pm peak periods, as a majority of the project traffic will be during off-peak hours and the traffic is spread throughout the day" (Grover 1994, pg. 97).

Based on this analysis, the Expansion EIR concluded that I-15 would continue to operate at an acceptable LOS with the addition of project traffic. The Expansion EIR also concludes that due to planned measures for SR-91, including HOV lanes and toll roads that have since been implemented, the landfill expansion would not result in significant impacts to SR-91, because the majority of landfill traffic would occur during off-peak hours. These findings were subsequently confirmed based on updated traffic volume counts conducted in 1995, which demonstrated that actual traffic associated with the landfill was between 10 to 70 percent lower than volumes projected in the 1994 traffic study. The findings disclosed in the Expansion EIR were reviewed by Caltrans, who agreed with the conclusions of the EIR and traffic study.

A subsequent analysis was conducted by URS in July 2004 in order to demonstrate compliance with the Expansion EIR MMP. The findings were documented in a memorandum entitled, *Truck Traffic on I-15 North of the Cajalco Bridge*. Based on the results of this analysis, it was demonstrated that during peak operating hours at the landfill (which was determined to occur at noon weekdays) only 1.0 percent or less of the traffic along I-15 is due to trucks associated with the landfill. During the typical AM and PM peak hours for overall vehicle traffic (i.e., non-trucks) along I-15, the report demonstrates that waste management truck traffic represents less than one percent of the total volume of traffic.

In 2003, Riverside County updated its General Plan as part of the RCIP and certified a Programmatic EIR (SCH No. 2002051143) to disclose and mitigate for significant impacts resulting from the proposed land use and policy changes. Based on revisions proposed to the General Plan, the EIR concluded that implementation of the revised General Plan would result in significant and unmitigable cumulative traffic impacts to both SR-91 and I-15 during the morning and afternoon peak hours. However, it should be noted that the El Sobrante Landfill already was an existing use at the time this EIR was certified. As such, traffic associated with landfill operations was not a contributing factor in the determination that these mainline segments would operate at less than acceptable LOS with implementation of the updated General Plan.

4.5.2 Basis for Determining Significance

The proposed Project would result in a significant impact to Transportation and Circulation if any of the following would occur as a result of a Project-related component:

1. *A substantial increase in vehicle trips or traffic congestion.*
2. *Hazards to safety from design features or incompatible uses.*
3. *Inadequate emergency access or access to nearby uses.*
4. *Insufficient parking capacity on-site or off-site.*
5. *Hazards or barriers for pedestrians or bicyclists.*
6. *A conflict with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks, etc.).*
7. *An interference with rail, waterborne, or air traffic.*

(Source: El Sobrante Landfill SWFP Revision Project Initial Study; August 9, 2007)

4.5.3 Impact Analysis

4.5.3.1 No Impacts/Less Than Significant Impacts

Issue No. 1: ***Would the Project result in a substantial increase in vehicle trips or traffic congestion?***

Average daily trips and intersection conditions with implementation of the proposed Project are based on the observed data following the southern California wildfires on October 23, 2007 (as shown in SEIR Table 2-3) and are presented in two different formats. The first format determines Project traffic conditions based on the proposed revisions to permitted waste disposal activities over a continuous 24-hour period and assumes a maximum of 1,305 vehicles. Intersection conditions under these assumptions are shown on Figure 4.5-3, *Proposed Intersection Conditions (1,305 Maximum Daily Trips)*. The second method, referred to as a "typical day," determines Project traffic conditions based on the proposed revisions to allow for waste disposal activities over a continuous 24-hour period, and assumes fewer than 1,305 daily trips are made. Data used to establish the "typical day" traffic volumes was provided by USA Waste of California, Inc. These "typical day" conditions are shown on Figure 4.5-4, *Proposed Intersection Conditions "Typical Day" (1,180 ADT)*.

- **Average Daily Trips**

Table 4.5-4, *Proposed Traffic Conditions*, provides a comparison of the ADT under current 20-hour waste acceptance operations for the AM and PM peak hour to the proposed 24-hour operations of the Project assuming both 1,305 vehicle trips ("worst-case" maximum) and 1,180 vehicle trips ("typical day" operations). The change to allow for acceptance of waste over a 24-hour period would allow landfill traffic to be shifted to off-peak times in the late evening or early morning, thereby distributing the same amount of ADT (1,305) over 24 hours as opposed to the existing 20-hour period of operation. As shown, assuming the worst-case maximum of 1,305 vehicle trips, this would result in a reduction in the total amount of peak hour trips. In addition, peak AM trips would be reduced from 114 to 91, and a nominal change would result during the PM peak hour compared to the current operations. Thus, assuming worst-case daily maximum vehicle trips at the landfill, implementation of the proposed Project would result in a reduction in trips from the landfill during the AM peak hour, and would result in no change to the PM peak hour operations. Table 4.5-4 also shows that under normal operating conditions (i.e., 1,180 trips), implementation of the proposed Project would result in an anticipated reduction of 28 vehicles, from 114 to 86, during the AM peak hour, and a reduction of 8 vehicles, from 76 to 68, during the PM peak hour. Although the proposed Project would result in an overall reduction of total peak hour trips to-and-from the landfill, it should be noted that passenger car trips will increase during the AM peak hour due to the addition of new employees on site. Regardless, based on this analysis, it is concluded that implementation of the proposed Project would not result in a substantial increase in vehicle trips along study area roadways.

Figure 4.5-3 Proposed Intersection Conditions (1,305 Vehicle Trips)

Figure 4.5-4 Proposed Intersection Conditions "Typical Day" (1,180 Vehicle Tripss)

Table 4.5-4 Proposed Traffic Conditions

Vehicle Type	AM Peak Hour Trips			PM Peak Hour Trips			Total ADT
	In	Out	Total	In	Out	Total	
Current 20-Hour Waste Acceptance Operations							
Passenger Cars	16	11	27	2	3	5	63
Heavy Trucks[1]	98	65	163	74	121	195	1,242
Total	**114**	**76**	**190**	**76**	**124**	**200**	**1,305**
Proposed 24-Hour Operations (1,305 ADT)							
Passenger Cars	31	21	52	2	3	5	71
Heavy Trucks	60	40	100	74	121	195	1,234
Total	**91**	**61**	**152**	**76**	**124**	**200**	**1,305**
Proposed 24-Hour Operations "Typical Day" (1,180 ADT)							
Passenger Cars	31	21	52	2	3	5	71
Heavy Trucks	55	37	92	66	108	174	1,109
Total	**86**	**58**	**144**	**68**	**111**	**179**	**1,180**

[1] Heavy trucks consist of large vehicles with three (3) or more axles and a length greater than 25 feet.
Source: Urban Crossroads, April 11, 2008.

- **Intersections**

Based on the anticipated AM and PM peak hour volumes for the Project under the proposed 24-hour operations with 1,305 vehicle trips, it is projected that delays will improve during the AM and PM peak hours, especially at the intersections of Temescal Canyon Road/Dawson Canyon Road and Clay Canyon Drive/Dawson Canyon Road. Table 4.5-5, *Existing Intersection Conditions (2009) vs. Proposed 24-Hour Operations (1,305 ADT)*, shows the change in delay at each of the study area intersections between the current 20-hour and proposed 24-hour waste acceptance operations, assuming the maximum of 1,305 vehicle trips is achieved. As shown, the change in delay ranges from a reduction of 0.1 to 1.2 seconds during the AM peak hour and nominal changes during the PM peak hour. Additionally, Table 4.5-5 shows that levels of service at the study area intersections are anticipated to remain the same during peak hours with the proposed Project.

Table 4.5-5 Existing Intersection Conditions (2009) vs. Proposed 24-Hour Operations (1,305 Vehicle Trips)

Intersection	Traffic Control[2]	Existing				Proposed (1,305 ADT)				Ē Delay (secs)	
		Delay (secs)		Level of Service		Delay (secs)		Level of Service			
		AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
I-15 Southbound Ramps (NS) at Temescal Canyon Rd. (EW)	TS	23.6	22.2	C	C	23.5	22.2	C	C	-0.1	0.0
I-15 Northbound Ramps (NS) at Temescal Canyon Rd. (EW)	TS	25.0	17.3	C	B	24.9	17.3	C	B	-0.1	0.0
Temescal Canyon Rd (NS) at Dawson Canyon Road (EW)	TS	19.9	19.8	B	B	18.7	19.8	B	B	-1.2	0.0
Clay Canyon Rd. (NS) at Dawson Canyon Rd. (EW)	CSS	11.6	12.0	B	B	10.5	12.0	B	B	-1.1	0.0

Source: Urban Crossroads, April 11, 2008.

Table 4.5-6, *Existing Intersection Conditions (2009) vs. Proposed 24-Hour Operations "Typical Day" (1,180 ADT)*, compares the delay and levels of service anticipated for the current 20-hour waste acceptance operations to that of the "typical day" under the proposed 24-Hour waste acceptance operations. The change in delays anticipated for this scenario includes reductions of 0.1 to 1.4 seconds and 0.0 to 0.5 seconds during the AM and PM peak hours, respectively. Also, levels of service at the study area intersections are anticipated to remain unchanged during peak hours with the proposed Project.

Table 4.5-6 Existing Intersection Conditions (2009) vs. Proposed 24-Hour Operations "Typical Day" (1,180 ADT)

Intersection	Traffic Control[2]	Existing				Proposed "Typical Day" (1,180 ADT)				Ě Delay (secs)	
		Delay (secs)		Level of Service		Delay (secs)		Level of Service			
		AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
I-15 Southbound Ramps (NS) at Temescal Canyon Rd. (EW)	TS	23.6	22.2	C	C	23.4	22.1	C	C	-0.2	-0.1
I-15 Northbound Ramps (NS) at Temescal Canyon Rd. (EW)	TS	25.0	17.3	C	B	24.9	17.3	C	B	-0.1	0.0
Temescal Canyon Rd (NS) at Dawson Canyon Road (EW)	TS	19.9	19.8	B	B	18.5	19.4	B	B	-1.4	-0.4
Clay Canyon Rd. (NS) at Dawson Canyon Rd. (EW)	CSS	11.6	12.0	B	B	10.3	11.5	B	B	-1.3	-0.5

Source: Urban Crossroads, April 11, 2008.

Based on the analysis above, it is concluded that implementation of the proposed Project would not result in a substantial increase in vehicle trips or traffic congestion, as traffic conditions in the surrounding area actually would improve slightly over existing conditions. Impacts are therefore evaluated as less than significant.

❑ Impacts to Freeway Mainlines

As indicated in Section 4.5.1.4, the Expansion EIR evaluated project impacts to freeway mainlines, including nearby segments of SR-91 and I-15, and concluded that implementation of the landfill expansion project would not result in any significant impacts to either of these facilities. As demonstrated in Table 4.5-4, implementation of the proposed Project would result in a slight reduction in peak hour trips on surrounding roadways, including mainline freeway segments. Because Project implementation would result in a reduction in peak hour trips, and because the previous Expansion EIR determined that the landfill would not result in significant impacts to either SR-91 or I-15, implementation of the proposed Project would not result in any significant impacts to freeway mainline segments, and mitigation would not be required.

Issue No. 2: ***Would the Project result in hazards to safety from design features or incompatible uses?***

Pursuant to the Expansion EIR MMP, roadway modification and traffic signal installation requirements were implemented to improve several surrounding roadways and intersections to the County of Riverside Transportation and Land Management Department standards (as documented

previously in Section 4.5.1.2). The proposed Project does not involve physical modifications to the existing El Sobrante Landfill site or adjacent facilities or roadways, and the maximum number of vehicle trips currently permitted on a daily basis (i.e., 1,305 Vehicle Trips) would not be changed. Therefore, because no additional physical improvements to surrounding roadways are proposed or necessary, and because the Project would not increase vehicular trips on surrounding roadways, the proposed Project would not result in hazards to safety from design features or incompatible uses and significant impacts would not occur.

Issue No. 3: Would the Project result in inadequate emergency access or access to nearby uses?

The El Sobrante Health and Safety Plan (described in SEIR Section 4.4, *Public Health and Safety*) includes several options to provide access to the site during emergency situations, as depicted on Figure 4.5-5, *Emergency Access Routes*. Implementation of the proposed Project, which seeks merely to alter existing operational characteristics at the landfill facility, would not alter the emergency access routes depicted on Figure 4.5-5 and would not result in any changes to existing access to surrounding nearby uses. Additionally, much of the lands surrounding the site to the north and east are proposed for permanent conservation as part of the western Riverside County MSHCP. Land uses to the south of the landfill would continue to be provided with existing access routes, and access to remaining parcels surrounding the landfill would be unaffected by the proposed Project. Therefore, implementation of the proposed Project would not result in inadequate access to nearby uses, and impacts are evaluated as less than significant.

Issue No 4: Would the Project result in insufficient parking capacity on-site or off-site?

Parking capacity was evaluated as part of the Expansion EIR and was determined not to be significant. The proposed Project would result in minor reductions in the peak number of employees working on the site at any given time, and as such, the amount of parking would remain adequate upon implementation of the proposed Project. As such, no impact would occur.

Issue No. 5: Would the Project create hazards or barriers for pedestrians or bicyclists?

The proposed Project would continue to utilize the same routes when traveling to and from the El Sobrante Landfill site as were indicated in the Expansion EIR. In fact, because the proposed Project would increase the number of hours the facility is open to accept waste, trip distribution would be spread over a greater period of time and any potential hazards or barriers for pedestrians or bicyclists would be reduced incrementally upon implementation of the proposed Project. Additionally, because the Expansion EIR identified necessary roadway improvements that have been completed to increase roadway safety conditions, and because no physical modifications to surrounding roadways are proposed by the Project, implementation of the proposed Project would not increase any hazards or barriers for pedestrians or bicyclists; therefore, a significant impact would not occur.

Issue No. 6: Would the Project conflict adopted policies supporting alternative transportation?

The previously prepared Expansion EIR found that alternative transportation policies were adequately addressed and found that no significant impact would result. The proposed Project would not alter any of the conditions at the landfill that were previously determined not to conflict with any policies supporting alternative transportation. Therefore, a significant impact would not occur.

Figure 4.5-5 Emergency Access Routes

Issue No. 7: Would the Project result in an interference with rail, waterborne, or air traffic?

The proposed Project site is not located near any bodies of water supporting waterborne traffic, is not located within the Airport Influence Area of any airports, and is not located near any railroad operations. Additionally, the Expansion EIR found that landfill operations would not interfere with rail, waterborne, or air traffic, and the current Project proposes no changes that would affect this determination. Therefore, no impact to rail, waterborne, or air traffic would result from implementation of the proposed Project.

4.5.4 Cumulative Impact Analysis

Although individual environmental effects of a proposed project may be determined to be insignificant when analyzed separately, the additive effect when viewed in connection with impacts of past, present, and future projects may cause the cumulative effect to become significant. However, as previously discussed, the El Sobrante Landfill would extend its hours of operation by four (4) hours but would not extend the currently permitted 1,305 daily trips if the proposed Project were implemented. As such, it is expected that peak congestion within the Project study areas would slightly decrease and any cumulative contribution attributed to the proposed Project would be reduced when compared to conditions under the existing SWFP. Additionally, the additional four (4) hours of operation would occur between the hours of 12 Midnight and 4:00AM, when traffic within the Project study area is least congested. Therefore, cumulative impacts relative to transportation and traffic would not occur.

4.5.5 Significance of Impacts Prior to Mitigation

The proposed Project would not result in an increase in vehicle trips and would reduce traffic congestion at Project intersections and on freeway mainlines. As such, no additional mitigation would be required beyond that which was identified by the Expansion EIR and which was subsequently implemented. Significant impacts would not occur.

The proposed Project would not result in hazards to safety due to unsafe design features or incompatible uses and mitigation measures would not be required.

The proposed Project would not result in inadequate emergency access or access to nearby uses. Because significant impacts would not occur, mitigation would not be necessary.

The El Sobrante Landfill Project would not result in insufficient parking capacity, either on- or off-site. Because no significant impacts would result, mitigation would not be required.

The proposed Project would not result in hazards or barriers for pedestrians or bicyclists, and as such, significant impacts would not occur; therefore, mitigation measures would not be required.

The proposed Project would not conflict with adopted policies supporting alternative transportation or any kinds of traffic, including rail, waterborne, or air traffic and therefore, impacts are not anticipated and no mitigation measures are required or provided.

4.5.6 Mitigation Measures

Many of the mitigation measures required by the Expansion EIR and MMP have been implemented, although some mitigation measures would continue to be enforced (refer to Table S-1 for a summary

of mitigation measures for traffic and circulation that would remain in effect with approval of the proposed Project). As indicated in the above analysis, no impacts have been identified in association with the proposed Project, and additional mitigation is therefore not necessary.

5.0 Mandatory CEQA Topics

5.1 Effects Found Not to be Significant as Part of the Initial Study

As part of the permit review process for a project involving discretionary approval, an IS was prepared for the Project on August 8, 2007. The EA was completed pursuant to CEQA statute Section 21080(d) and related CEQA Guidelines Section 15063 to determine whether or not further analysis was required to evaluate the potential impacts of the proposed Project. The EA determined that proposed Project would not have the potential to cause adverse effects associated with the following issue areas: Biological Resources, Cultural Resources, Geology/Soils, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Population/Housing, Public Services, Recreation, Utilities and Services. Therefore, these issues are summarized below and not carried forward for detailed analysis in Section 4.0 of this SEIR. Overall, for these issue areas, there are no substantial changes to the circumstances under which the Project would be undertaken nor is there any new information to be disclosed as part of the proposed Project requiring a major revision of the Expansion EIR for the El Sobrante Landfill expansion. In addition, mitigation measures previously imposed on the Project for the following issue areas still would be required, as appropriate, and as described in the MMP (Table S-1).

5.1.1 Biological Resources

The proposed Project does not involve the expansion or disturbance of lands beyond the limits permitted under the Expansion EIR, nor does the Project increase landfill activity above what is already permitted; therefore, no new impacts beyond those already addressed in prior CEQA analysis would occur. The mitigation measures identified in the MMP, which include the purchase of off-site riparian/wetland habitat in concert with the western Riverside MSHCP, sufficiently address all biological impacts associated with previous landfill expansions. In addition, in July 2001, USA Waste prepared a MSHCP for the El Sobrante Landfill. The El Sobrante MSHCP serves as a comprehensive habitat conservation plan focusing on the conservation of species and their associated habitats that occur within lands owned and operated in conjunction with the El Sobrante Landfill. The El Sobrante MSHCP covers the duration of waste management activities, including post-closure activities for the landfill. The proposed Project would be consistent with the El Sobrante MSHCP. Therefore, implementation of the proposed Project would not result in any impacts to biological resources beyond that which was previously disclosed and mitigated for.

5.1.2 Cultural Resources

The Expansion EIR for the El Sobrante Landfill Expansion concluded that no sites of historical significance have been discovered on or near the Project site and, as such, no significant impacts to historical resources would occur.

While the potential for the existence of archaeological and paleontological resources is high in the El Sobrante area, mitigation measures responding to the potential discovery of such resources were incorporated into the MMP and are applicable to the proposed Project. Because the Project does not propose to disturb any additional areas beyond the limits of the existing landfill, the Expansion EIR adequately addressed the proposed Project's impact to archaeological, historical, and paleontological resources. Therefore, implementation of the proposed Project would not result in any impacts to cultural resources beyond that which was previously disclosed and mitigated for.

5.1.3 Geology/Soils

The Expansion EIR concluded that the Project is not located within an Alquist-Priolo Earthquake Fault Zone or any existing County Fault Hazard Zones, nor is it located in a Recommended Fault Hazard Zone. The Expansion EIR also concluded that there are no site conditions indicating the potential of ground rupture due to faulting, subsidence, or liquefaction during earthquake ground shaking, landslide or lurching of exposed slope faces. Landslides were determined to be unlikely due to the existence of shallow, consolidated bedrock. The Expansion EIR also determined that due to the site's topography, events such as tsunamis or seiches are precluded and potential geological hazards, such as volcanic activity, collapsible or expansive soil conditions, or excessive settlement, have not been identified on-site. All slopes and grading will continue to substantially conform with approved specifications, as identified in the Expansion EIR. Therefore, since the proposed Project would not result in any additional expansion or disturbance of the Project site beyond existing limits, issues relating to geology/soils were adequately examined in the Expansion EIR and are considered less than significant in this SEIR. The recommended mitigation measures identified in the MMP are applicable and will be implemented as part of the proposed Project. Therefore, implementation of the proposed Project would not result in any impacts to geology and soils beyond that which was previously disclosed and mitigated for.

5.1.4 Hydrology/Water Quality

As concluded in the Initial Study prepared for the proposed Project, no new or additional activities will occur that may impact absorption rates, drainage patterns, surface waters, groundwater, or expose people to water related hazards. The proposed Project does not involve any changes to the physical characteristics of the site and therefore, the previously prepared EIR adequately addresses Hydrology and Water Quality impacts. The recommended mitigation measures identified in the MMP are applicable and will be implemented as part of the proposed Project (refer to the MMP in SEIR Table S-1). Therefore, implementation of the proposed Project would not result in any impacts to hydrology and water quality beyond that which was previously disclosed and mitigated for.

5.1.5 Land Use/Planning

The proposed Project would not change the conclusions stated in the Expansion EIR (SCH No. 1990020076) nor would the Project result in a change in landfill operations that would create additional impacts to land use/planning. While the Project would result in the addition of four (4) hours of truck traffic to and from the landfill site, the total amount daily traffic permitted at the landfill would not increase beyond the 1,305 maximum daily trips permitted under existing conditions. Additionally, all mitigation measures relating to land use and planning identified in the MMP would remain in effect (refer to the MMP in SEIR Table S-1).

The Project does not propose to deviate from the previously-approved General Plan or zoning designations and would not create conflicts with environmental plans and policies, including the MSHCP. Potential conflicts with adjacent residential land uses, including the Toscana Specific Plan No. 327 which is located south of the El Sobrante Landfill Project site, were determined to be less than significant in the Expansion EIR due to the provision of extensive open space buffers. Because the Project does not propose any changes to the Project conditions evaluated in the Expansion EIR, the proposed Project would not result in conflicts with surrounding residential development.

Lastly, the Expansion EIR indicated that implementation of the landfill would not result in significant impacts to agricultural resources/operations, and further concluded that the physical division of a

community would not result from development of the landfill. Because the proposed Project would not increase areas proposed for disturbance, there would be no change to these prior determinations.

5.1.6 Mineral Resources

The Project does not propose to disturb any additional areas beyond what is currently permitted and implementation of the proposed Project would not change the impact findings concluded in the Expansion EIR with respect to the loss of mineral resources. Additionally, the proposed Project would not substantially change the nature of the existing activities on-site as evaluated in the Expansion EIR. Therefore, the Expansion EIR's conclusion with respect to potential land uses conflicts with mining operations would not change with approval of the proposed Project, and such impacts would not be significant. In addition, and as documented in the Expansion EIR, the proposed Project is not identified by the State Geologist as containing any "known mineral resource deposits," and as such, significant impacts would not occur. Furthermore, as the site was not historically used for mining operations, there would be no public health hazards associated with the prior use of the site for mining operations. As such, no significant mineral resource impacts would occur as a result of the proposed Project.

5.1.7 Population/Housing

The site is an existing landfill and no new homes or commercial development is being proposed as part of the Project. Therefore, no homes or people would be displaced. However, the proposed Project would result in the increase of eight (8) employees[1] at the Project site. These employees would likely be secured from the existing and surrounding population and therefore have a less than significant impact on cumulative population growth. No change to the impact findings concluded in the Expansion EIR relating to population and housing is anticipated, and significant impacts to population and housing would not result from Project implementation.

5.1.8 Public Services

Potential impacts to emergency medical services were analyzed in the Expansion EIR, which contained mitigation measures to ensure adequate emergency medical services, including fire services. The proposed Project would not result in a significant impact to emergency services as a result of increasing the number of employees from 57 to 65 with the incorporation of previously identified mitigation measures (refer to the MMP in SEIR Table S-1). Also, while an increase in truck trips would occur from the hours of 12:00 Midnight and 4:00 AM, the total number of daily trips evaluated in the Expansion EIR would not increase; therefore, the proposed Project would not result in additional need of police protection or road maintenance. Lastly, the increase of eight (8) additional employees does not represent a significant increase and additional jobs would be sourced from the surrounding areas. As such, a significant impact to schools, police, or health services would not occur.

5.1.9 Recreation

The proposed Project involves minor changes to the operational characteristics at an existing landfill which would not generate a need for park services or recreational activities and no recreational impacts are identified.

[1] Source: Waste Management, Inc.

5.1.10 Utilities/Service Systems

The proposed Project would result in the increase of approximately eight (8) on-site employees which would nominally increase power, natural gas and water consumption, wastewater and solid waste generation and communication services. The Expansion EIR sufficiently addresses utility and service system impacts relating to the landfill expansion and provides mitigation measures to reduce such impacts to less than significant levels. The minor increase in employees would not alter the Expansion EIR's conclusions that impacts to utilities and service systems would not be significant.

5.2 Unavoidable Significant Environmental Effects of the Proposed Project

The State CEQA Guidelines Section 15126(b) requires that an EIR disclose the significant environmental effects of a project which cannot be avoided if the proposed project is implemented. As described in detail in Section 4.0 of this SEIR, the proposed Project is not anticipated to result in significant unavoidable impacts to aesthetics, air quality, noise, public health and safety, or transportation.

5.3 Significant Irreversible Environmental Changes Which Would Be Caused By the Proposed Project Should It Be Implemented

CEQA Guidelines Section 15126.2(c) mandate that an EIR must address any significant irreversible environmental changes which would be involved in the proposed action should it be implemented. An impact would fall into this category if:

- The project would involve a large commitment of nonrenewable resources.
- The primary and secondary impacts of the project would generally commit future generations to similar uses.
- The Project involves uses in which irreversible damage could result from any potential environmental incidents associated with the Project.
- The proposed consumption of resources are not justified (e.g., the project results in wasteful use of energy).

Determining whether the proposed Project may result in significant irreversible effects requires a determination of whether key resources such as coal, oil, gas or water would be degraded or destroyed in such a way that there would be little possibility of restoring them.

The proposed Project would increase the hours of operation of the El Sobrante Landfill for acceptance of waste disposal by four (4) hours which would yield an increase in the number of trucks visiting the Project site above what currently exists; however, the maximum daily trips of 1,305 as specified in the SWFP would remain the same. According to records provided by the Project proponent, the landfill is currently operating sufficiently below the daily trip and tonnage capacity limits specified in the existing and proposed SWFP. The Project also proposes to change the daily tonnage capacity limit to a weekly capacity limit of 70,000 tons. In addition, as part of the proposed Project, on-site landfill activities including application of daily cover, stockpiling of daily cover, site maintenance, grading, and vehicle maintenance would continue to operate 24-hours a day as under

existing conditions. Although it is expected that the number of equipment used on-site and the number of workers would increase above existing conditions, the actual number required to handle the anticipated daily tonnage under the proposed Project is assumed to be consistent with the worst-case scenario estimates used in the Expansion EIR. The Expansion EIR already analyzed energy consumption and resource needs (i.e., fuel, power, water, gas) of the added equipment and employees. Therefore, the impacts of committing nonrenewable resources or the potential for irreversible environmental damage to occur or the potential wasteful use of energy associated with the proposed Project have already been accounted for in previous CEQA analysis.

Overall, the Project would not negatively impact the availability of nonrenewable resources, result in an increase in fuel consumption, or promote wasteful energy use. Additionally, the proposed Project would not change the findings relating to significant irreversible environmental change identified in the Expansion EIR for the El Sobrante Landfill for the following reasons:

1. The Project does not propose to change the size of the existing landfill site which otherwise would expand the limits of disturbance and change the topography and visual quality of the area.
2. The Project does not propose to disturb any additional land in support of its objectives to operate the landfill more efficiently which otherwise could affect sensitive biological resources.
3. The Project proposes modifications to the SWFP that are within the operating restrictions of the permit with respect to the 1,305 daily maximum vehicle trips and weekly tonnage limits of 70,000.
4. The proposed Project changes are consistent with the optimal-case scenario used in the impact analysis of the Expansion EIR.

As documented in SEIR Section 4.2, air quality in the local area would not be adversely affected by the proposed Project. Short-term air quality impacts would not occur as construction activities are not a part of the proposed Project. In addition, long-term daily operational and area source emissions would not increase as a result of ROG, NOx, CO, PM_{10} and SOx emissions and operational emissions impacts would be less than significant.

5.4 Growth Inducing Impacts of the Proposed Project

CEQA requires a discussion of the ways in which the proposed Project could be growth inducing. The CEQA Guidelines Section 15126.2(d) identify a project as growth-inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. New employees from nearby commercial development, schools, golf courses, and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with the increase in project population and thus reducing or removing the barriers to growth. This occurs in suburban or rural environs where population growth results in increased demand for service and commodity markets responding to the new population. This type of growth is, however, a regional phenomenon resulting from the introduction of a major employment center or regionally significant housing project. Additional economic growth may occur

as a result of the Project. It is expected that any such development would occur consistent with planned growth identified in the Riverside County General Plan and in the General Plans of adjacent jurisdictions.

Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment. Typically, growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies such as the Southern California Association of Governments (SCAG). Significant growth impacts could also occur if the project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

The proposed Project would not laterally or vertically expand the El Sobrante Landfill site and no new construction would occur. The Project is merely a response to existing population growth and solid waste generation and management trends. As described in Section 1.0, *Introduction*, the Project merely proposes to increase the hours of operation of the El Sobrante Landfill for acceptance of waste disposal by four (4) hours and would change the maximum disposal tonnage limits from a daily limit to a weekly limit; however, the net amount of tonnage per week would not change. The addition of four (4) hours of operational working hours would increase staff at the Project site by an additional eight (8) employees, which translates into the need for approximately two (2) dwelling units within the Project vicinity; however the addition of eight (8) employees is unlikely to result in an expansion of growth and would likely be sourced from the surrounding community. Likewise, the Project would not encourage future development in the surrounding areas because the Project does not include a change in net amount of waste received per week. Although not proposed, even if the landfill could receive more waste than what is permitted, a landfill is not a land use type that would generally attract new residents to the area and therefore, preclude any growth inducing impacts form occurring all together. In short, the proposed Project would not change the growth inducing impacts identified in the Expansion EIR.

6.0 Alternatives to the Proposed Project

6.1 Rationale for Alternatives Section

Section 15126.6(a) of the State CEQA Guidelines indicates the scope of alternatives to a proposed project that must be evaluated:

> *"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selection of a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."*

Based on the analysis conducted in this SEIR and discussed in Chapter 4.0, *Environmental Analysis*, implementation of the proposed Project would not result in significant impacts and mitigation measures would not be required. Finally, as discussed in Chapter 4.0, *Environmental Analysis*, and Chapter 5.0, *Mandatory CEQA Topics*, implementation of the Project would not result in significant impacts to aesthetics, air quality, biological resources, cultural resources, geology/soils, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public health and safety, public services, recreation, transportation and circulation, and utilities/service systems.

CEQA Guidelines Section 15126(d)(5) also states that "the range of alternatives in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The State CEQA Guidelines provide several factors that should be considered in regard to the feasibility of an alternative; those factors include: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site if an off-site alternative is evaluated. The reason for selecting the alternatives analyzed in this chapter is to reduce the Project's impacts on the issues that have received focused analysis in this document (i.e., aesthetics, air quality, noise, public health and safety, and transportation and traffic) through on-site land use alternatives.

6.2 Alternatives Under Consideration

The El Sobrante Landfill was sited as a consequence of an extensive siting analysis and EIR prepared by the County in the 1980's. Likewise, the Expansion EIR considered a range of alternatives pursuant to Section 15126.6(a) of the State CEQA Guidelines. As a consequence, it is not incumbent on the SEIR for the proposed Project, which is a supplement to the Expansion EIR, to consider more than the No Project Alternative, as no other alternatives are considered feasible. Under the No Project Alternative, decision-makers must either approve or deny the proposed Project.

6.2.1 No Project Alternative

Under the No Project Alternative, the proposed operational changes at the El Sobrante Landfill, as contemplated by the proposed revision to SWFP No. 33-AA-0217, would not be implemented. Per the CEQA Guidelines, this alternative includes what would be reasonably expected to occur in the foreseeable future if the proposed Project were not approved, based on current plans and consistency with available infrastructure and community services (CEQA Guidelines Section 15126.6). As such, under this alternative, the El Sobrante Landfill would continue to operate under its existing permit, SWFP No. 33-AA-0217. Table 6-1, *Comparison of Environmental Impacts of the No Project Alternative Relative to the Proposed Project*, provides a comparison of environmental impacts for the proposed Project and the No Project Alternative.

6.3 Alternatives Considered and Rejected

6.3.1 Alternative Sites

CEQA does not require that analysis of alternative sites always be included in an EIR. However, if all the surrounding circumstances make it reasonable to consider an alternative site then this alternative should be considered and analyzed in the EIR. In making the decision to include or exclude analysis of an alternative site, the *"key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR"* (CEQA Guidelines §15126.6(f)(2).

Among the factors that may be considered when addressing the feasibility of alternative sites are site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (CEQA Guidelines, Section 15126.6 (f)(1)).

This SEIR does not analyze an alternative site for the El Sobrante Landfill Project, because none are available. The proposed Project consists of an amendment to the operational characteristics of a previously approved project that is located in a fixed location. Due to the fact that the El Sobrante Landfill has been operational since 1986 and that the only identified alternative to the proposed Project is the No Project Alternative, this SEIR does not consider alternative site locations.

6.4 Alternatives Analysis

The following discussion compares the impacts of the No Project Alternative with the impacts of the proposed Project, as detailed in Chapter 4.0 of this SEIR. A conclusion is provided for each impact as to whether the alternative results in one of the following: (1) reduction or elimination of the impact, (2) a greater impact than the Project, (3) the same impact as the Project or (4) a new impact in addition to the proposed Project impacts.

6.4.1 No Project Alternative

Under this alternative, the El Sobrante Landfill site would continue to operate under its existing SWFP No. 33-AA-0217. As such, the El Sobrante Landfill would continue to operate on a 24-hour basis, would receive waste only between the hours of 4:00 AM and 12:00 Midnight, and would be held to a daily maximum disposal capacity of 10,000 tons.

6.4.1.1 Aesthetics

With the proposed Project, waste would be received on a continual 24-hour basis, and the amount of waste received would be permitted on a weekly limit, opposed to a daily limit. If the proposed Project were implemented, lighting associated with delivery trucks along the Project's access road would be increased between the morning hours of 12:00 Midnight and 4:00 AM. As a result, implementation of the No Project Alternative would have fewer impacts on aesthetics, visual quality, light and glare than the proposed Project. However, as with the proposed Project, mitigation measures identified in the MMP would continue to be implemented, and impacts to aesthetics, visual quality, light and glare would remain less than significant. .

6.4.1.2 Air Quality

Under the No Project Alternative, landfill operations would continue to occur on a 24-hour basis; however, waste would not be accepted between the hours of 12:00 Midnight and 4:00 AM, and the limit of waste received on a daily basis would not exceed 10,000 tpd. Also, the limit of vehicles accepted on-site would remain limited to a maximum of 1,305 daily trips. Mitigation measures identified in the MMP would continue to be implemented and impacts to air quality would remain less than significant. Because the proposed Project would allow waste disposal over a continual 24-hour period, peak hour trips and air quality would be slightly reduced. While the proposed Project would result in some increases in emissions, air quality emissions would not exceed SCAQMD's regional or localized thresholds upon Project implementation and with implementation of the mitigation measures from the Expansion EIR. Despite the slight differences between the proposed Project and the No Project Alternative, impacts to air quality would remain less than significant with either project.

6.4.1.3 Noise

Under the No Project Alternative, landfill operations would continue to occur on a 24-hour basis, however, waste would not be accepted between the hours of 12:00 Midnight and 4:00 AM and the limit of waste received on a daily basis would not exceed 10,000 tpd. Also, the limit of vehicles accepted on-site would remain limited to a maximum of 1,305 daily trips. Mitigation measures identified in the MMP would continue to be implemented, and impacts to noise would remain less than significant. Because the proposed Project would allow waste disposal over a continual 24-hour period, peak hour trips and noise conditions would be slightly reduced. Despite the slight differences between the proposed Project and the No Project Alternative, impacts to noise would remain less than significant with either project.

6.4.1.4 Public Health and Safety

Under the No Project Alternative, landfill operations would continue to occur on a 24-hour basis, however, waste would not be accepted between the hours of 12:00 Midnight and 4:00 AM and the limit of waste received on a daily basis would not exceed 10,000 tpd. Existing safety plans and established emergency procedures would continue to be implemented, as well as existing procedures dealing with the processing and screening of potentially hazardous wastes. As a result, the No Project Alternative would not result in an increase or decrease of impacts associated with public health and safety when compared to the proposed Project. As with the proposed Project, impacts to public health and safety would remain less than significant.

6.4.1.5 Transportation and Circulation

Under the No Project Alternative, waste delivery trucks would be permitted between the hours of 4:00 AM and 12:00 Midnight only. Mitigation measures identified in the MMP would continue to be implemented and the El Sobrante Landfill would be permitted to receive 1,305 vehicles per day. However, unlike the proposed Project, waste delivery trucks would not be permitted to deliver waste to the landfill between the hours of midnight and 4:00 AM. As such, the extended hours of operation would shift some landfill traffic to off-peak times in the late evening and early morning, thereby reducing the number of vehicles on the surrounding circulation network during peak hours. As a result, the No Project Alternative would result in a slight increase in traffic congestion when compared to the proposed Project. However as with the proposed Project, impacts to transportation and circulation would remain less than significant, because all impacts previously identified in the Expansion EIR have since been mitigated for.

6.4.1.6 Conclusion

As indicated in the above analysis, because the proposed Project would not result in any significant impacts, additional mitigation would not be required for the El Sobrante Landfill SWFP Revision. Implementation of the No Project Alternative would slightly reduce the Project's impacts to air quality and aesthetics, but would increase impacts to noise and traffic. Additionally, the No Project Alternative would fail to meet the Project objectives as identified in Chapter 3.0, *Project Description*, of this document.

Table 6-1 Comparison of Environmental Impacts of the No Project Alternative Relative to the Proposed Project

Environmental Analysis Subject	Proposed Project Impact Analysis	No Project Alternative	
		Impact Analysis	Impact Compared to Project
Aesthetics	L	L	-
Air Quality	L	L	-
Noise	L	L	+
Public Health and Safety	L	L	X
Transportation and Circulation	L	L	+

N/S = No significant impacts
L = Impacts are less than significant after mitigation.
S = Impacts are significant after mitigation
+ = Impacts are greater than the proposed Project
- = Impacts are less than the proposed Project
X = Impacts are similar to the proposed Project

7.0 References

7.1 Persons Contributing to SEIR Preparation

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Lesley Likins, Planning Manager
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Aric Evatt, Principal
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Charlene S. Hwang, Senior Transportation Engineer
J.T. Stephens, Acoustical Engineer

7.2 Websites Consulted

CEQANet. www.ceqanet.com

MapQuest. www.mapquest.com

7.3 List of References

7.3.1 Documents Consulted

Albert Grover and Associates
1994 Traffic Impact Study for El Sobrante Landfill Expansion Plan (Years 1996 to 2001, 10,000 tons per day).

Environmental Solutions, Inc.
1994 Draft Environmental Impact Report – El Sobrante Landfill Expansion (SCH No. 90020076).
1996 Final Environmental Impact Report – El Sobrante Landfill Expansion (SCH No. 90020076).
1998 Update to the Final Environmental Impact Report – El Sobrante Landfill Expansion (SCH No. 90020076).

Riverside County Department of Environmental Health
2007 El Sobrante Solid Waste Facility Permit No. 33-AA-0217.

Riverside County Waste Management Department.
2007 Environmental Assessment Form: Initial Study.

USA Waste Management of California, Inc.
2006 El Sobrante Landfill Annual Monitoring Report.

URS Corporation.
2004 Joint Technical Document – El Sobrante Landfill.
2004 Truck Traffic on I-15 North of the Cajalco Bridge.

7.3.2 Documents Incorporated by Reference

Riverside, County of.
2007a El Sobrante Solid Waste Facility Permit. (This document is available for review at the Riverside County Waste Management Department, 14310 Frederick Street, Moreno Valley, CA 92553).

2007b Second Amendment to the Second El Sobrante Landfill Agreement. (This document is available for review at the Riverside County Waste Management Department, 14310 Frederick Street, Moreno Valley, CA 92553).

2003 First Amendment to the Second El Sobrante Landfill Agreement. (This document is available for review at the Riverside County Waste Management Department, 14310 Frederick Street, Moreno Valley, CA 92553).

2001 Multiple Species Habitat Conservation Plan for the El Sobrante Landfill. (This document is available for review at the Riverside County Waste Management Department, 14310 Frederick Street, Moreno Valley, CA 92553).

2001 MSHCP Implementation Agreement (This document is available for review at the Riverside County Waste Management Department, 14310 Frederick Street, Moreno Valley, CA 92553).

1998 Second El Sobrante Landfill Agreement: A Public – Private Project Between County of Riverside and USA Waste of California. (This document is available for review at the Riverside County Waste Management Department, 14310 Frederick Street, Moreno Valley, CA 92553).

USA Waste of California, Inc.
2007 El Sobrante Landfill Annual Monitoring Report.

7.4 Documents Appended to this SEIR

The following reports are contained within the El Sobrante Landfill SEIR Technical Appendices. A copy of the Technical Appendices is available for review at the Riverside County Waste Management Department (RCWMD), 14310 Frederick Street, Moreno Valley, CA 92553.

Appendix A Notice of Preparation (NOP), Initial Study, and Comments Received.

Appendix B *El Sobrante Landfill Air Quality Evaluation*. Urban Crossroads, Inc., April 25, 2008.

Appendix C *El Sobrante Landfill Noise Evaluation*. Urban Crossroads, Inc., April 25, 2008.

Appendix C1 *El Sobrante Landfill Noise Analysis Addendum*. Urban Crossroads, Inc., February 10, 2009.

Appendix D *El Sobrante Landfill Traffic Evaluation*. Urban Crossroads, Inc., April 11, 2008.