



**SIMI VALLEY LANDFILL AND
RECYCLING CENTER**

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September 20, 2007

Ms. Becky Linder
County of Ventura
Planning Department
800 S. Victoria Avenue
Ventura, CA 93009

Subject: Incomplete Application, Response to Comments

Dear Becky:

In response to your letter dated May 22, 2007 regarding the Application for Modification 8 of CUP 3142 (LU07-0054), the following response is provided for your review. Our responses are bulleted in ***bold and italicized text***.

Ventura County Resource Management Agency, Planning Division

1. Discrepancies exist between the configuration of the lot lines that are shown in Parcel Map Waiver/Lot Line Adjustment Case No. 1246 (Recorded on August 11, 2004; Parcel "C") and Parcel Map Waiver/Lot Line Adjustment Case No. 1247 (Recorded on August 18, 2004; Parcel "B"), for the portion of the project site that includes the existing landfill. Furthermore, Figures 1-4 and 1-5 (March 2007) of the project application identify "proposed" property lines. As such, it is unclear as to what are the configurations of the existing legal lots that constitute the project site. Please submit a revised site plan that shows the legal lot lines for all of the lots that constitute the project site. This information will be used to verify the project's compliance with the development standards of the *Ventura County Non-Coastal Zoning Ordinance* (2005, Article 6), and compliance with the terms of Land Conservation Act (LCA) Contract No. 85-1.1, to which Assessor Parcel Numbers (APNs) 615-0-160-135 and 615-0-150-325 are subject.

Also, Assessor Parcel Number 615-0-160-29 shown in Tables 1-1 and 1.2, Section B - Project Description, does not exist in the County GIS parcel data base. The parcel number should have been 615-0-150-29. Please change all references to parcel number 615-0-160-29 in the project description packet to reflect the correct parcel number: 615-0-150-29.

- ***Please see Application Addendum/Response to Comments Figures 1-3, 1-4 and 1-5 for revised maps. The APN has been corrected.***
2. The project description (Section 5.0, "Personnel and Equipment") states that the total number of employees for G.I. Rubbish and the Simi Valley Landfill and Recycling Center (SVLRC) would increase from 250 to 395-400 employees (a net increase of 145-150 employees). However the response to the Project Questionnaire, Item No. 11, states that the total number of employees for G.I. Rubbish and the SVLRC would increase from approximately 230 to "+/-400" employees. Please reconcile the discrepancy in the existing number of employees and provide a more precise estimate on the proposed number of employees.
- ***Discrepancy corrected.***
- 2a. Pursuant to the *Ventura County General Plan (2005) Employment and Commerce/Industry Policy 3.4.2.8*, projects that would result in an increase of 30 or more employees require an evaluation of impacts to the jobs/housing balance of Ventura County. If the project would result in an increase of 30 or more employees, you will need to submit a jobs/housing analysis, pursuant to the requirements of the *Ventura County Initial Study Assessment Guidelines (2006, §2.b.D.2)*.
- ***A housing analysis, prepared by Psomas, is included in the Application Addendum/Response to Comments at Tab D.***
3. Provide an estimate of the timing of the four phases of the project.
- ***Figure 3-1 was modified to include the referenced timing of each phase of project development.***
4. Provide a written statement and accompanying revised site plan describing and showing, respectively, the location of all proposed uses and development within the proposed buffer area, as well as revised technical reports (as necessary) to analyze the potential impacts of development activities within the buffer zone.
- ***Please reference Figure 1-5, which was revised to include the known uses within the buffer area (i.e., riparian area, sedimentation basins, etc).***

5. Please submit a noise study that analyzes the project's potential noise impacts, pursuant to the requirements of the *Ventura County Initial Study Assessment Guidelines* (2006, §19).
 - ***As discussed, SVLRC would prefer to analyze this potential impact during any subsequent CEQA documents required.***

6. Provide conceptual plans (a site plan, floor plans, and building elevations) for all proposed buildings, structures, and outdoors lighting.
 - ***Included in the Application Addendum/Response to Comments at Tab E is a site plan with building elevations, etc. Also provided are color renderings along with paint color recommendations.***

7. The Project Description Questionnaire, Item No. 24, states that the exact number of trees that would be removed as part of the proposed project has not been determined. Moreover, the biological report (PSOMAS, February 27, 2006) recommends the preparation of an arborist's report to assess the proposed project's potential to adversely affect the protected trees within the project site. Please submit an arborist's report that analyzes the project's potential to adversely affect protected trees, pursuant to the requirements of the *Ventura County Non-Coastal Zoning Ordinance* (2005, §8107-25 et seq).
 - ***As discussed, SVLRC would prefer to analyze this potential impact during any subsequent CEQA documents required.***

8. Submit map or site plan showing location for eight-inch sewer main that would connect with the City of Simi Valley's sewer line.
 - ***Attached in the Application Addendum/Response to Comments at Tab F is a sewer study prepared by Psomas. As you know, issues regarding the connection to the City of Simi Valley's sanitary sewer line have been raised. As such, this report was prepared to also address the feasibility of installing an onsite packaged wastewater treatment unit should the sanitary sewer connection not be feasible.***

9. The project site is located within an area that has a high potential for archaeological and paleontological resources (Ventura County GIS Maps 2006). The archaeological report (Greenwood and Associates, April 1998) and the paleontological report (Paleo Environmental Associates, April 27, 1998) did not evaluate potential impacts to archaeological and paleontological resources that might be located within the proposed landfill expansion area. Moreover, it is unclear from the Initial Study (PSOMAS, April 11, 2007),

which appears to be a literature review of previous reports for the existing landfill area, whether or not additional studies have been prepared to evaluate the proposed project's potential impacts to archaeological and paleontological resources within the proposed expansion area. Therefore, please submit a Phase I archaeological and paleontological resources report that meets the requirements of the *Ventura County Initial Study Assessment Guidelines* (2006, §9, *Paleontological Resources*, and §10.a, *Archaeological Resources*).

- ***Please reference the Application Addendum/Response to Comments at Tab G of Cultural and Paleological determinations.***

10. Contact Mr. Steven A. Fields, Operations Engineer, State of California Department of Conservation, Division of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) to determine if any active, abandoned, or plugged oil wells or ancillary facilities exist on or within the vicinity of the project site. Submit a site plan identifying the location of any such wells or facilities in relation to the project site.

- ***Please reference the Hazards Report submitted with the application package for all the DOGR information on abandoned well locations.***

11. The *Ventura County General Plan* (2005), Biological Resources Policy 1.5.2.3 states (in part): *...Discretionary development that would have a significant impact on significant wetland habitats shall be prohibited, unless mitigation measures are adopted that would reduce the impact to a less than significant level; or for lands designated 'Urban' or 'Existing Community,' a statement of overriding considerations is adopted by the decision-making body.*

The project site has land use designations of "Open Space," "Urban," and "Urban Reserve." Please submit a revised site plan that identifies: the location of the areas that are subject to the various land use designations for the property; the unnamed drainage within the landfill expansion area; and, any other wetlands within the project site. In order to obtain a map that identifies the location of the land use designations for the project site, please contact Mr. Jose Moreno, County of Ventura, GIS Mapping at (805) 477-1585.

- ***The requested map is provided in the Application Addendum/Response to Comments at Tab H***

12. Please provide a detailed description of the methodology that was used for calculating the anticipated closure dates of the Simi Valley Landfill for the currently permitted facilities and the proposed facilities. Please make sure to include the following: population growth estimates for Ventura County and any other jurisdictions from which the Simi Valley Landfill accepts solid

waste; identification of the source and amount of all existing and anticipated sources of solid waste; existing and anticipated solid waste generation rates for the jurisdictions from which the Simi Valley Landfill accepts solid waste; and, any other assumptions on which the calculations are based.

- *Population projections based upon SCAG and U.S. Census Bureau data suggest Ventura County is to grow in population at a rate of 1% from 2000 to 2030:*

Year	2000	2005	2010	2015	2020	2025	2030
Ventura County Population	758,054	821,045	865,145	897,295	929,181	960,025	989,765

Source: Southern California Association of Governments (SCAG) and the United States Census Bureau

The California Integrated Waste Management Board has recorded waste generation data for the five-year period of 2001 through 2005. Review of this data yields a mean average annual increase in waste generation of 4.8% per year:

CIWMB Data

	2001	2002	2003	2004	2005
Annual Tonnage	900,391	922,477	971,475	1,037,454	1,074,691
Percent Increase		2.45%	5.31%	6.79%	3.59%
TPD @ 286 days/yr	3,148	3,225	3,397	3,627	3,758
Total Ventura County Daily Cap	4,500	4,500	4,500	4,500	4,500
Ventura County Daily Capacity vs. Actual Daily Tonnage	1352	1275	1103	873	742

The data from SCAG as well as the CIWMB can be utilized as the basis for developing reasonable forecasts of future waste generation and compared to remaining landfill capacities to determine estimates of site life.

Landfill capacities are determined by comparing design capacity with landfill volume consumed over time.

Factors such as compacted density are also essential to complete the estimate of landfill life. Density for the SVLRC is assumed (based upon historic site performance) to be 0.8-tons/cubic yard.

Waste generation for Ventura County can be estimated for future years using the data as indicated above. The following table forecasts waste generation assuming

an annual increase of 4.84% for the initial period through 2010 (based upon recent historic figures), and then begin to conservatively reduce the year over year increase to 2.42% (2011 through 2015) and 1.21% (2016 through 2030):

	2010	2015	2020	2025	2030
VC Disposal Volumes	1,361,190	1,534,061	1,629,145	1,730,122	1,837,359
Year over year increase	4.84%	2.42%	1.21%	1.21%	1.21%
Tons per day (286 days per year)*	4,759	5,364	5,696	6,049	6,424

* Days per year calculated at 5.5 days per week

CURRENT PERMITTED LANDFILL (SVLRC)

The current SVLRC operation is limited to 3,000 TPD for waste disposal (MSW). Remaining landfill capacity estimates have been developed utilizing topographic survey results to calculate volume consumed between surveys and comparing the cumulative volume consumption with the established design capacity. This yields remaining capacity which is converted to remaining tons using the 0.8 tons/cubic yard density factor.

Utilizing the background waste generation data and site specific remaining tonnage capacity calculations, together with the fact the SVLRC operates at near the 3,000 TPD limit, results in a forecasted remaining site life through 2025.

It has also been noted that a shortcoming exists in the area of available daily tonnage to serve Ventura County disposal needs. County waste generation forecasts indicate that daily tonnage needs will exceed the combined available daily limits of both disposal sites operating within the County by 2010.

PROPOSED EXPANDED LANDFILL

For the proposed landfill expansion the closure date has been estimated utilizing the above base data and by assuming that the landfill will operate at the proposed 6,000 TPD MSW disposal limit, 312 days per year. This yields a calculated closure date of 2051, which represents the soonest the expanded landfill will close if running at full capacity 6 days per week. However, it is reasonable to assume that the landfill will not operate at the maximum daily permit limits every day, therefore the life of the landfill is likely to extend further beyond the 2051 estimated closure date.

Waste generation forecasts for Ventura County indicate that the expansion project with the proposed 6,000 TPD limit will accommodate more than 90% of the County's disposal needs through at least 2030.

13. The *Ventura County General Plan (2005) Waste Treatment and Disposal Facilities Policy 4.4.2.5* requires the project site to be restored to a use that is compatible with surrounding land uses. Please provide a written statement that describes how the project would comply with this policy.

- ***The Project Description was modified to include a statement regarding the site being restored to a use compatible with surrounding land uses.***

14. The *Ventura County General Plan (2005) Public Utilities Policy 4.5.2.3* states that all discretionary development shall be conditioned to place utility service lines underground wherever feasible. Please submit either: a site plan that illustrates the location of overhead utility service lines that will be placed underground; or, submit evidence (e.g., a written statement or cost estimate from a licensed contractor or electrician) to demonstrate that the undergrounding of utility service lines is infeasible for this project.

- ***Please refer to the Site Plan - Figure 3-2. As indicated, all utility lines will be installed in accordance with Ventura County ordinances.***

Advisory information: The County sent the biological resources report to the USACOE and CDFG for review and comment. Once those agencies have commented, the County will forward their recommendation and requirements for additional analysis of potential impacts to bio resources.

- ***Advisory Noted***

Ventura County Resource Management Agency, Environmental Health Division

15. The project description did not contain information on the status of the existing buildings and septic system(s) in the facility area. Provide information on the proposed use or demolition of any existing buildings and/or septic systems.

- ***Please refer to the project questionnaire. Ultimately, the existing septic system will be removed and the buildings demolished with the exception of one portable building (referred to as EMD) that will remain to support the CoGen and landfill O&M personnel. Please note: this building is NOT on the existing septic system.***

16. The project description did not contain information on any existing buildings/structures/residences within the proposed property lines/CUP boundary. EHD noted existing structures on an aerial photograph of the project. Provide information on the location and distances to existing structures on the subject property including the new boundary.

- ***The ranch house noted in the aerial photograph was discussed on page 5 in the project questionnaire, however it should be noted that the ranch house is on a septic system and the pumping report is included in the Application Addendum at Tab K.***

17. The project description did not contain detailed information on the proposed expansion of the green waste processing operation. Provide detailed information on the processing of green waste, including but not limited to, amount of material received, processing time, end use, vector control, odor control, dust, chipping and grinding, self haul, etc.

- ***The project description was modified to include additional information on the green waste operation.***

18. The project description did not contain detailed information on the construction and demolition processing facility. Provide detailed information on the processing of construction and demolition material, including but not limited to, amount of material received, processing time, end use, vector control, dust, self haul, etc.

- ***The project description was modified to include additional information on the construction and demolition debris processing operation.***

19. The project description did not contain information on traffic from the public. Provide information on the estimated traffic from visitors for the household hazardous waste operation, and self haul trips for the green waste and construction and demolition processing operations.

- ***The traffic projections provided in the Project Questionnaire on Page 13 details all the traffic associated with this project including the operations referenced above.***

20. The expansion of the SVLRC could affect the Los Alamos Creek drain, which is a Watershed Protection District (District) jurisdictional channel, because the Site Layout Plan, Figure 3-3, shows the grading limit extending across the creek's bed and banks. This proposed work will require a watercourse permit from the District.

- ***The SVLRC had a wetlands biologist mark the bed and bank limits of Los Alamos Creek. We have overlaid those points on a map with the sedimentation basin, which is the limit of the grading in that location. Our assessment concludes that the grading for the project will not encroach into Los Alamos Creek drainage. Please see letter report and map included in the Application Addendum at Tab I.***

21. Page 15 in the project description questionnaire under section D-1, Drainage, states that "Storm water from the expanded site will be managed without increasing peak discharges above existing or historical volumes." The hydrology study submitted was not produced using District standards so it is unclear if the volumes of runoff will be reduced to existing or historic levels in all storm events, which is the District's basic CEQA requirement.

- **Preliminary hydrology developed for the expansion project was compared to flows presented in the Master Plan of Drainage for Simi Valley as a check for conformance. The analysis indicated a peak flow of 634 cfs for the 100-year storm and maximum outflow of 305 cfs from the sedimentation basin. For the subject area, the Simi Valley Master Plan of Drainage peak flow rate is 610 cfs for 100-yr event and 338 cfs for the 10-year event. Thus, inflows are comparable, slightly conservative, and acceptable for a preliminary planning level analysis. In addition, predicted outflows are consistent with requirements that 100-year developed conditions result in outflows less than 10-year existing conditions.**

A detailed hydrologic analysis will be performed at the time construction drawings are prepared for the sedimentation basins. The detailed hydrologic analysis will be performed in accordance with Ventura County standards and the County will have an opportunity to review and comment on the draft construction drawings prior to finalizing the drawings and proceeding with sedimentation basin construction.

22. Simi Valley Landfill Recycling and Expansion Project Initial Study, dated April 11, 2007, states in the Section 5.8 Hydrology and Water Quality, page 30, subsection h): "Place within a 100 year flood hazard area structures which would impede or redirect flood flows? No Impact". This is not correct as it is clear from checking the FIRM maps and the figure 1-5 that a detention basin is planned in an area of a 100 year flood plain ("A" zone) along Los Alamos

Creek and its tributary as shown on the FIRM map for this area. This detention basin would likely connect directly to our jurisdictional channel, the Los Alamos Creek, so the basin must be designed to meet the District's construction standards.

- ***We concur that if the basin is in the 100-year flood plan then it will be constructed to District Standards.***

Ventura County Public Works Agency, Integrated Waste Management Division (IWMD)

California State Assembly Bill 939 (AB 939) requires every city and county in the state to divert a minimum of 50% of their wastestream from disposal at landfills or face potential fines of up to \$10,000 per day. Should the proposed project be approved, there will be a 3,000 TPD reduction in the recycling capacity previously approved by the Board of Supervisors on November 26, 2002 for CUP 3142 (Major Mod 6) at the landfill, the County's largest solid waste facility, until the year 2050.

23. Therefore, the IWMD requests that Waste Management of California provide data, forecasts, and/or studies that substantiate their conclusion that a reduction in recycling capacity at the SVLRC will not negatively impact Ventura County jurisdictions' ability to meet the requirements of AB 939.

- ***Ventura County currently generates approximately 4,000 tons per day of waste for disposal at the two landfills in Ventura County. These two landfill operations have a combined daily permitted disposal capacity of 4,500 tons. In the next 5 years, Ventura County will generate more tons of waste for disposal on a daily basis than the two landfills are allowed to receive under current permits. (See comment #12 response). The IWMD is concerned that the reduction in daily recycling capacity at SVLRC from 6,250 to 3,250 will negatively impact the county's ability to meet the state's mandated AB939 goals. Currently SVLRC receives approximately 1,000 TPD of recyclables, of which 500 TPD are generated in Ventura County. This is far below the 6,250 TPD limitation the SVLRC is currently permitted to receive as well as the lower limit of 3,250 TPD that the project proposes. The current recycling operations, which include construction and demolition, organic and inert recycling and some commodities recycling such as metal, only represent a small portion of the total recycling infrastructure serving Ventura County. In addition to the two MRF/Transfer Stations located in west county, there are multiple organic, metals and paper product recyclers operating in various parts of the county. Therefore the reduction in permitted limits will not negatively impact diversion goals. In fact, our project includes the addition of a recyclables transfer/materials recycling facility and***

Environmental Collection Center, which will positively add to the County's goals. As stated previously, these recycling components, both current and proposed, only represent a small portion of the recycling infrastructure serving the County and the collective volumes of these facilities are well below the proposed lower recycling limit of 3,250 TPD.

24. Construction & Demolition (C&D) Processing Area at SVLRC:
- What type of equipment will be utilized in the processing area to ensure the efficient handling of all C&D delivered to the SVLRC for processing?
 - Can this equipment handle the anticipated volume of C&D received for processing (per day, per month) at the SVLRC until 2050?
 - Is the processing area designed in a manner that will assist all County jurisdictions in their efforts to meet the diversion requirements of AB 939 until 2050?

- The Construction and Demolition (C&D) materials recycling facility is currently being developed under our existing CUP and is anticipated to be operational in late 2007. Based on the Daily Reporting System (DRS) records SVLRC disposes 1-200 TPD of commingled C&D than can be processed to remove recyclable content. The Facility we are developing will have the capacity to manage up to 500 TPD. Using the same growth rates to forecast refuse we generated the following estimates.*

Forecasted Volume

	2006	2010	2020	2030	2040	2050
SVLRC Average C&D Volumes (tons)	150	190	214	253	286	322
Year over year increase	4.84%	2.42%	1.21%	1.21%	1.21%	1.21%

In conjunction with other operating C&D processing facilities within the county, a 500 TPD facility will be adequately sized to process East County commingled C&D.

25. The Del Norte Transfer Station and Gold Coast Recycling & Transfer Station provide the west County with 4,379 TPD capacity to process recyclables.

a. *Explain how a 500 TPD cap at the proposed SVLRC MRF will assist east County jurisdictions in their efforts to comply with the mandates of AB 939 until the year 2050*

- *The proposed 500 TPD recycle transfer/materials recovery facility is designed to transfer/ process commingled recyclable material generated in the East County. The following forecast is prepared using the same growth rates applied to refuse.*

Forecasted Volume

	2006	2010	2020	2030	2040	2050
SVLRC Average Recycling Volumes (tons)	200	242	300	338	381	430
Year over year increase	4.84%	2.42%	1.21%	1.21%	1.21%	1.21%

It should also be noted when referencing the two MRF's in the West County that these facilities are transfer stations as well as recycling facilities. Del Norte and Gold Coast transfer station operations consume the majority of the published daily tonnage processed through the facilities which is then transferred for disposal at disposal operations such as the SVLRC. Therefore the referenced 4,379 TPD for these facilities is primarily the MSW component of their operation. The IWMD requests that Waste Management of California provide data, forecasts, and/or studies that substantiate their conclusion that a reduction in recycling capacity at the SVLRC will not negatively impact Ventura County jurisdictions' ability to meet the requirements of AB 939.

Ventura County Public Works, Transportation Department

26. The Traffic and Circulation Study dated March 27, 2007, pages 7 and 16, assumes that no landfill truck traffic will travel beyond the City of Moorpark on the impacted segment of State Route 118 between Somis and Moorpark. There is no factual evidence to support this assumption. The Traffic Study/ developer shall provide a guarantee that there will be no project-specific impacts based on Ventura County impact thresholds. The Application for Modification of the Conditional Use Permit dated April 11, 2007, prepared by Psomas, shall address this Traffic and Circulation Study stating that there will be no truck traffic beyond the impact segment of State Route 118 and the City of Moorpark.

- *The SVLRC has limited options to provide a "guarantee" as requested. However, WM will include contract language in new contracts requiring*

vendors to avoid the use of State Route 118 between Somis and Moorpark as part of the contract requirements.

27. The proposed modification shall establish the new trip baseline for the project.

- **Comment noted and we concur**

Advisory information from the Watershed Protection District:

28. Proposed project does not lie within the Simi Groundwater Basin. The waste footprint of the expansion area lies over the South Las Posas Groundwater Basin. Page 88, Section 6.8.1.3 (Regional Groundwater Basins) – This section states the proposed project lies within the Simi Groundwater Basin. The actual boundary of the Simi Groundwater Basin is outside of the landfill boundary and is located south and east of the landfill. Although the landfill lies over portions of both the East Las Posas Hydrologic Subarea and the Simi Valley Hydrologic Subarea when surface drainage is considered, the correct identification for the groundwater basin that the landfill lies over is the (the proposed waste footprint of the expansion area) South Las Posas Groundwater Basin.

- **Advisory noted**

29. Include discussion of potential impacts to South Las Posas Groundwater basin in subsequent environmental evaluations. (Hydrogeologic Assessment Proposed Facility Expansion Area) - The application contains a hydrogeologic assessment with both monitoring well placement and soil/groundwater sampling results within the proposed expansion area. Although this report is fairly comprehensive, it failed to acknowledge the underlying South Las Posas Groundwater Basin and its associated implications toward water quality and potential loss of groundwater supply should any negative impacts result from landfill seepage. A discussion of such potential impacts should be included in subsequent Environmental Impact Reports or site evaluations. Exposures of porous soil materials or loss of aquifer recharge (infiltration areas) that have a hydrologic connection to the vital Fox Canyon or Grimes Canyon aquifers should be examined (Sespe Formation equivalent?).

- **Advisory noted**

30. Page 91, Section 6.8.1.6 (Occurrence and Movement of Groundwater) – The statement, “The existing SVLRC does not lie within a designated groundwater basin, “should be modified to acknowledge the “active portion of the existing SVLRC” does not overlie any groundwater basin, however the proposed expansion would (see prior comments above). Results of field investigations are detailed in this section, including the measured or probable conductivity

(K) rates of near-surface soils beneath the proposed landfill extension. Several of these rates can be considered fairly rapid when compared to typical soil or bedrock not within a known groundwater basin, therefore evidence exists that the expansion may directly impact the aquifer exposures within the South Las Posas Groundwater Basin, and if contaminated, could result in far-reaching effects on downstream groundwater users or groundwater quality.

- **Advisory noted**

Ventura County Fire District

31. Provide scaled plans showing existing and proposed structures.
 - **Please reference Application Addendum/Response to Comments at Tab E.**
32. Include access to all structures per fire district standards.
 - **Please reference Application Addendum/Response to Comments at Tab E.**
33. Fire flow proposed of 1250 gallons per minute (gpm) is inadequate to support the proposed 30,000 and 25,000 square feet of structures. Based on the project information provided, the fire flow shall be a minimum of 2500 gpm.
 - **2500 gpm will be the minimum provided.**

Ventura County Air Pollution Control District - Advisory Comments

- :
38. Section 6.3 of the application packet and the initial study in Section 5.3 address air quality issues pertaining to the project. These tables and discussions conclude that air quality impacts from the project will be less than significant. We have reviewed the air quality discussion and initial study checklist and do not concur with the findings. Because the proposed project involves a large change to the existing operation and the fact that Simi Valley tends to have the highest ozone levels in Ventura County, we recommend potential air quality impacts be evaluated in an environmental impact report. Specifically, the air quality assessment in the environmental impact report should consider reactive organic compound and nitrogen oxide emissions from all project-related motor vehicles and construction equipment from all phases of the project. The air quality assessment should also evaluate PM2.5, PM10 and fugitive dust impacts to potential receptors in the area. This evaluation will likely require modeling analyses.

- **Advisory Noted**

39. The District also recommends that a formal health risk assessment be conducted for the project. Possible health risk impacts on nearby receptors should be evaluated, including potential health risks from diesel vehicle emissions traveling to and from the landfill. Mitigation measures should also be identified and discussed if the assessment indicates a significant risk.

- ***Advisory Noted***

Ventura County Office of Agricultural Commissioner

Issue: APN 615-0-150-32 and APN 615-0-160-13 contain farmland classified as "Local Importance."

40. Provide map of proposed new SVLRC boundary and CUP boundary w/Important Farmland Inventory overlain.

- ***Please reference Application Addendum/Response to Comments at Tab J***

41. Explain omission of "Local Importance" Farmland from Initial Study.

- ***Omission was in error.***

42. Calculate area of "Local Importance" Farmland within proposed waste expansion area and buffer area.

- ***The areas of "Local Importance" Farmland within the area of the proposed SVLRC expansion project totals 206.8 acres (95.8 acres within the Buffer Area and 111.0 acres within the Proposed Waste Expansion Area). Please see the attached figure in Tab J entitled Simi Valley Landfill and Recycling Center Expansion – Farmlands of Local Importance for a graphic representation.***

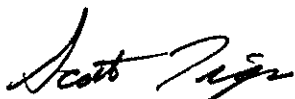
43. Initial Study does not follow format of Ventura County Guidelines for new or expanded non-farming uses adjacent to off-site classified farmland or crop production. THIS COMMENT DOES NOT REQUIRE A RESPONSE—the Ag Commissioner's office invites an explanation, but does not require one.

- **Comment Noted**

In closing we would like to mention that at the request of Ventura County agencies, the processing and handling of Biosolids is a program that can be evaluated and assessed further by Waste Management if appropriate. However, we have not included this operation at this time as part of the proposed project.

Please contact me at 805-579-7478 if you have any further questions regarding this submittal.

Regards,

A handwritten signature in black ink, appearing to read "Scott Tignac". The signature is fluid and cursive, with the first name "Scott" written in a larger, more prominent script than the last name "Tignac".

SCOTT TIGNAC
District Manager