APPENDIX A

NOTICE OF PREPARATION AND INITIAL STUDY (NOP/IS)

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

SUBJECT: **NOTICE OF PREPARATION OF DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT**

PROJECT TITLE: **SUNSHINE GAS PRODUCERS RENEWABLE ENERGY PROJECT**

In accordance with the California Environmental Quality Act (CEQA), the South Coast Air Quality Management District (SCAQMD) is the Lead Agency has prepared this Notice of Preparation (NOP) and Initial Study (IS) for the project identified above. The project's description, location, and potential environmental impacts are described in the NOP and the Initial Study. This NOP/IS serves two purposes: 1) to solicit information on the scope of the environmental analysis for the proposed project, and 2) notify the public that the SCAQMD will prepare a Draft Subsequent Environmental Impact Report (SEIR) to further assess potential adverse environmental impacts that may result from implementing the proposed project.

This letter, NOP, and the attached IS are not SCAQMD applications or forms requiring a response from you. Their purpose is simply to provide information to you on the above project. If the proposed project has no bearing on you or your organization, no action on your part is necessary.

Comments focusing on your area of expertise, your agency's area of jurisdiction, or issues relative to the environmental analysis should be addressed to Mr. Jeff Inabinet at the address shown above, sent by FAX to (909) 396-3324, or e-mailed to jinabinet@aqmd.gov. Comments must be received no later than 5:00 p.m. on Friday, December 18th, 2009. Please include the name and phone number of the contact person for your organization.

Project Applicant: Sunshine Gas Producers

Date: November 13, 2009 **Signature:** Steve Smith

Steve Smith, Ph.D.
Program Supervisor
Planning, Rules, and Area Sources

Reference: California Code of Regulations, Title 14, Sections 15082, 15103, and 15375

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
21865 Copley Drive, Diamond Bar, California 91765-4182

NOTICE OF PREPARATION OF A DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Project Title:
Sunshine Gas Producers Renewable Energy Project

Project Location:
The project site is located within the Sunshine Canyon Landfill which is approximately 0.75 mile southwest of the intersection of Interstate 5 and SR-14. The proposed project is located within the County of Los Angeles.

Description of Nature, Purpose, and Beneficiaries of Project:
Sunshine Gas Producers (SGP) is proposing to develop and operate a gas turbine electricity generation facility at the existing Sunshine Canyon Landfill. The facility would use otherwise flared landfill gas (LFG) to generate electricity. The electrical generation facility will use LFG extracted from the landfill as fuel in gas turbines to drive electricity generators. The proposed facility would consist of LFG treatment equipment for compression, gas dewatering, filtration, and siloxane removal; five gas turbine engines connected to individual electricity generators; and ancillary equipment. The renewable energy facility would be located on property leased from Browning-Ferris Industries of California, Inc. (BFI), the operators of the landfill, on the northern end of the landfill property away from the residential communities and located immediately south of Sunshine Canyon Landfill property boundary.

Lead Agency:	**Division:**
South Coast Air Quality Management District	Planning, Rule Development and Area Sources

Initial Study and all Supporting Documentation are Available at:

SCAQMD Headquarters
21865 Copley Drive
Diamond Bar, CA 91765

or by Calling:
(909) 396-2039

Or by accessing:
http://aqmd.gov/ceqa/nonaqmd.html

Scheduled Scoping Meeting Date:
A CEQA scoping meeting will be held on Wednesday, December 9th, 2009 at 6:30pm at the Sylmar Public Library, 14561 Polk Street, Sylmar, California 91342 on the proposed project.

The Notice of Preparation is provided through the following:

☑ Los Angeles Times (November 19, 2009)
☑ San Fernando Valley Sun (November 19, 2009)
☑ SCAQMD Website
☑ SCAQMD Public Information Center
☑ Interested Parties
☑ SCAQMD Mailing List

Review Period:
Thursday, November 19th, 2009 through Friday, December 18th, 2009

CEQA Contact Person:	**Phone Number:**	**E-Mail Address**
Jeff Inabinet	(909) 396-2453	jinabinet@aqmd.gov

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

INITIAL STUDY FOR THE
SUNSHINE GAS PRODUCERS RENEWABLE ENERGY PROJECT

SCH No. TBD

November 2009

Executive Officer
Barry Wallerstein, D.Env.

Deputy Executive Officer,
Planning, Rule Development, and Area Sources
Elaine Chang, DrPH

Assistant Deputy Executive Officer,
Planning, Rule Development, and Area Sources
Laki Tisopulos, Ph.D, P.E.

Planning and Rules Manager
CEQA and Toxics
Susan Nakamura

Prepared by: ARCADIS U.S., Inc.

Reviewed by: Jeffrey Inabinet - Air Quality Specialist
Steve Smith, Ph.D. - Program Supervisor
Jeri Voge – Senior Deputy District Counsel

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EXECUTIVE OFFICER

BARRY R. WALLERSTEIN, D. Env.

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CHAPTER 1

PROJECT DESCRIPTION

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INTRODUCTION

Sunshine Gas Producers (SGP) is proposing to develop and operate a gas turbine electrical generation facility at the existing Sunshine Canyon Landfill in northern Los Angeles County, California. SGP is proposing to install five gas turbines that would utilize currently flared landfill gas to generate power. No component of the currently proposed project would expand landfill capacity or increase the amount of waste that can be accepted on a daily, monthly or annual basis. Sunshine Gas Producers, LLC, a Michigan limited liability company, is jointly-owned by DTE Biomass Energy and Landfill Energy Systems, under the management of DTE Biomass Energy. Headquartered in Ann Arbor, Michigan, DTE Biomass Energy is a wholly owned subsidiary of DTE Energy. Landfill Energy Systems is headquartered in Wixom, Michigan, and is a wholly owned subsidiary of EIF Renewable Energy Holdings, LLC.

SGP has contracted with Browning-Ferris Industries of California, Inc. (BFI), the owner of Sunshine Canyon Landfill, for the sale of landfill gas from the Sunshine Canyon Landfill. Sunshine Gas Producers, LLC, and BFI are separate corporate entities. A more detailed project location and project description for the proposed project are provided below.

This Initial Study (IS) has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA; California Public Resources Code §21000 et seq.) to evaluate the potential environmental impacts associated with the Sunshine Gas Producers Renewable Energy Project. Throughout this document, references to "proposed project" or "Sunshine Gas Producers Renewable Energy Project" (SGPREP) are one and the same and are used interchangeably.

AGENCY AUTHORITY

The proposed SGPREP is a "project" as defined by California Public Resources Code §21065 and CEQA Guidelines §15378. CEQA requires that potential adverse environmental impacts of proposed projects be evaluated and that methods to reduce or avoid identified significant adverse environmental impacts of these projects be implemented if feasible. An environmental impact is defined as an impact to the physical conditions that exist within the area that would be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic significance.

The lead agency for a proposed project is the public agency principally responsible for carrying out or approving a project that may have a significant adverse effect upon the environment (Public Resources Code §21067). Consultation with the County of Los Angeles determined that, because the South Coast Air Quality Management District (SCAQMD) has the greatest responsibility for supervising or approving the SGPREP as a whole, and because the only expected significant environmental effect of this project relates to air quality, the SCAQMD would be the most appropriate public agency to act as lead agency for the proposed project (CEQA Guidelines §15051(b)). The SCAQMD has the authority to issue discretionary approvals for this project, and specifically must conduct a new source review and issue an Authority to Construct (ATC) and a Permit to Operate (PTO) before the project can move forward.

PROJECT BACKGROUND

The proposed project site straddles the boundary between the County of Los Angeles ("the County") and City of Los Angeles ("the City"). The current configuration of the Sunshine Canyon Landfill consists of the existing operating County Landfill and an inactive landfill on the City portion of the proposed project site. Sunshine Canyon Landfill is owned and operated by BFI, a wholly owned subsidiary of Allied Waste Industries, Inc. Landfill operations formally commenced in the City portion of Sunshine Canyon Landfill in 1958 and continued there until the expiration of a City zoning variance in 1991.

The current configuration of the landfill is the result of a complex history of land use and zoning actions undertaken over the last 20 years by both the City and the County, with the ultimate objective being the merger of two preexisting landfills in separate jurisdictions into one larger landfill that would be subject to the same, or similar, mitigation and operating requirements.

In the mid-1980s, while the original City Landfill was operating, BFI began planning to extend landfill operations into the adjoining County portion of Sunshine Canyon Landfill. In 1986, BFI applied to the County for a Conditional Use Permit (CUP) and other related entitlements (i.e., Compound Plan Amendment, Sub-Plan Amendment and Oak Tree Permit), and the County began preparation of an environmental impact report ("the County EIR"). In February 1991, the Board of Supervisors certified the EIR as a Final EIR (FEIR), granted several land use approvals, issued requisite project permits, and approved the project, known as the "County Landfill," which accommodated disposal of an average of 6,000 tons of refuse per day (exclusive of inert/exempt materials), six days per week (with a 6,600-ton daily maximum), for a total of approximately 17 million tons of landfill capacity over the landfill's site life. The County Landfill footprint was approximately 215 acres. Disposal was permitted on multiple working face areas that were limited to two to three acres each.

The County envisioned that landfilling would eventually cross back into the City portion of Sunshine Canyon Landfill, and that City and County operations would be combined into a single landfill. Accordingly, in Condition 10b of the CUP, the Board of Supervisors directed BFI to pursue an application to the City of Los Angeles to allow further landfilling within the City portion to avert the destruction of oak trees and other significant ecological resources in the County portion. Combining the City and County landfills would increase the capacity to approximately 100 million tons without appreciably expanding the total footprint of the separate operations in the City and County. In the FEIR, the combined City/County operation was analyzed as an alternative landfill design. The FEIR noted that in order to be executed, the alternative design required issuance of complementary entitlements by the City.

Both the City of Los Angeles and the North Valley Coalition (NVC), a group of residents located south of the City Landfill, challenged the County Landfill approval and Final EIR certification in court. In 1992, the court required preparation of additional CEQA documentation. Two Addenda to the 1991 FEIR and a document entitled *Additional Information and Analysis* were prepared. In November 1993, the County recertified the FEIR as supplemented by these documents,[1] and the County Landfill project was granted final approval. The NVC also challenged the recertified FEIR in court, but this challenge was unsuccessful, and the FEIR was upheld.

[1] *Final Environmental Impact Report, Sunshine Canyon Landfill Extension,* State Clearinghouse Number 89071210 (November 1993).

In 1991, while litigation was underway in connection with the County FEIR, in accordance with Condition 10b of the County CUP, BFI filed project applications with the City for the entitlements necessary to develop the City portion of a joint City/County landfill, including a City General Plan Amendment and Zone Change.

Although the FEIR had already analyzed a combined City/County landfill design, the earlier design was somewhat larger than that contemplated in BFI's applications to the City. In addition, the City requested certain other refinements in the design and operation of the proposed project that were not contemplated in the FEIR. Thus, the City determined that a Subsequent EIR (SEIR) would be required under CEQA to more specifically address these changes.[2]

As a result of the lawsuits by the City and the NVC challenging the 1991 County approvals and the 1993 FEIR, there was substantial delay in processing of the City approvals. In July 1997, six years after project applications were filed with the City, the Draft Subsequent Environmental Impact Report ("Draft SEIR"),[3] which incorporated by reference the FEIR, was issued. The Final Subsequent Environmental Impact Report ("Final SEIR"), incorporating the Draft SEIR and responding to several hundred individual comments, was then issued in June 1998. After nine public hearings before various City planning bodies, including a City Hearing Examiner, the Planning Commission, the City Council Planning and Land Use Management ("PLUM") Committee, and the full City Council, the City certified the SEIR for the combined City/County Landfill Project and issued the City entitlements necessary to carry out the project on December 8, 1999. In doing so, the City adopted the SEIR's conclusion that all impacts of the project, except for the regional cumulative air quality impact, were less than significant after mitigation. As to the air quality impact, the City found the impact could not be feasibly mitigated below a level of significance, and it adopted a Statement of Overriding Considerations in compliance with CEQA.

In December 1999, the City granted the necessary City entitlements for the City/County Landfill: a General Plan Amendment and a Zone Change (Sunshine Canyon Extension Project). In January 2000, the NVC filed a lawsuit attacking the project approvals rendered by the City, including the City's certification of the SEIR. The NVC alleged numerous deficiencies in the SEIR and alleged that the project was inconsistent with the City's General Plan and zoning. In December 2000, the Los Angeles Superior Court upheld the project approvals in all respects, and that decision was upheld by the California Court of Appeal. The decision of the Court of Appeal was not appealed to the State Supreme Court and therefore is final. Accordingly, the 1999 City approvals remain in full force and effect.[4] A final addendum to the EIR and SEIR for Sunshine Canyon Combined Landfill was drafted in 2004 in order to finalize modifications to the CUP and update conditions associated with the permit, the analyses presented in the 2004 Addendum to the EIR and SEIR ensured that the City/County Landfill project was consistent with conditions approved by the City of Los Angeles.

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[2] The City's Environmental Study Advisory Committee (ESAC) determined in 1991 that the following environmental topical areas should be fully addressed in the SEIR. They included: earth, air quality, biological, noise, land use, risk of upset, transportation/circulation/access, public services, energy conservation, water conservation, service systems, equestrian issues and cultural resources.

[3] *Draft Subsequent Environmental Impact Report, Sunshine Canyon Landfill,* State Clearinghouse Number 92041053 (July 1997).

[4] In addition, a solid waste facilities permit (SWFP) has been issued by the City Environmental Affairs Department on May 21, 2003, as approved by the California Integrated Waste Management Board (CIWMB), for landfilling within the City portion of Sunshine Canyon; the City approved an Oak Tree removal permit on April 7, 2004; and Waste Discharge Requirements have been approved by the Regional Water Quality Control Board for that landfilling.

To facilitate the development of the combined landfill contemplated in 1993 by the County and to ensure consistency between County and City approvals for the City/County Landfill described in the 1999 SEIR, BFI returned to the County to obtain certain revisions to the 1993 CUP, which were embodied in the New CUP. In several areas, these revisions increased the mitigation obligations contained in the 1993 County CUP. This final action resulted in the issuance of a revised Mitigation Monitoring and Reporting Plan (MMRP) for the landfill.

Currently, all of the governmental permits necessary for development of the Sunshine Canyon Extension Project are in place, including: the 404 Department of the Army Permit from the U.S. Army Corp of Engineers, No. 2003- 00408-A0A, dated February 26, 2004; the Conditional Water Quality Certification 401 Permit from the Regional Water Quality Control Board (RWQCB), file No. 03-001, dated February 6, 2004; the Waste Discharge Requirements from the RWQCB, file No. 58-76, Order No. R4-2003-0155, dated December 17, 2003; the General Permit to Discharge Storm Water Associated with Construction Activity from the State Water Resources Control Board (SWRCB), identification No. 419C326485; the General Permit to Regulate Storm Water Discharges Associated with Industrial Activities from the SWRCB, identification No. 000165360; the Oak Tree Removal Permit from the City, approved on April 7, 2004; the 1603 Streambed Alteration Agreement with the California Department of Fish and Game, No. R5-2003-0005 dated March 11, 2004; the Fugitive Dust Emissions Control Plan for Sunshine Canyon Facility ID Number 049111 per the SCAQMD Rule 403; and building and grading permits from the City.

As described in the SEIR and approved by the City, the combined City/County Landfill will accommodate a total disposal capacity of approximately 90 million tons, consisting of 55 million tons in the City and 35 million tons in the County.[5] Because of setback requirements and a change in the location of a sedimentation basin and related drainage issues, the design provides less capacity than the 100-million ton landfill envisioned in the County FEIR**.** The County portion of the Project included the 17-million-ton County Landfill currently in operation and the 18 million-ton increment in the 42-acre bridge area, both of which were authorized by the 1993 County CUP. The 42-acre bridge area also accommodates approximately 22 million tons of landfill capacity on the City side.

The City/County Landfill Project allows for disposal in the combined City and County areas of an average of 11,000 tons per day, six days per week, of Class III solid waste (with a 12,100 ton daily maximum), and 6,600 tons per week of inert/exempt materials, which would result in approximately a 25-year operational site life. The landfill footprint encompasses approximately 451 acres: 194 acres in the City (including part of the inactive City Landfill) and 257 acres in the County (including the 215-acre footprint of the operational County Landfill and the 1993-authorized 42-acre bridge area). The Project also provides for a maximum 10-acre working face area (i.e., the area where waste is being deposited).

The analysis in this IS relies upon the environmental analysis from two previously approved environmental impact reports for the initial development of the Sunshine Canyon Landfill. The first is the *Final Environmental Impact Report for the Sunshine Canyon Landfill Extension* (State Clearinghouse No. 89071210), initially certified by the County of Los Angeles Board of Supervisors on February 19, 1991, and, after litigation, recertified with two Addenda and a document entitled *Additional Information and Analysis* (collectively the "FEIR") on November

[5] See City [Q] Conditions B.2.a and B.2.b. As of April 2002, approximately 7 million tons of capacity has been utilized in the County Landfill.

30, 1993. The FEIR was supplemented by the *Final Subsequent Environmental Impact Report, Sunshine Canyon Landfill* (State Clearinghouse No. 92041053) June 1998, certified by the City of Los Angeles on December 8, 1999 ("the SEIR") in connection with its adoption of a Zone Change and General Plan Amendment that approved landfilling in the City portion of Sunshine Canyon Landfill ("the City Landfill"). The 1999 SEIR authorized several revisions to the County Conditional Use Permit (CUP), including the deletion, modification, and renumbering of certain conditions, as well as the addition of conditions (collectively, "the New CUP"). The 1999 SEIR also incorporated revisions to the Mitigation, Monitoring and Reporting Summary (MMRS) approved in 1993 for the County Landfill. The MMRS was recently updated in 2006 to incorporate the most stringent requirements of either the City or County side CUP, the contents of which are presented in **Appendix 1-1** . The previously completed environmental review documents will be relied upon to provide background information and analysis of environmental conditions within the footprint of the existing Sunshine Canyon Landfill that would remain unaffected by the construction and/or operation of the proposed project. These documents are available for public review from the SCAQMD as part of the administrative record of this action.

To fulfill the purpose and intent of CEQA for the proposed SGPREP, the SCAQMD has prepared this IS to determine the appropriate CEQA document for the proposed project. This IS tiers off of the Final Subsequent Environmental Impact Report (Final SEIR) prepared for the Sunshine Canyon Landfill that was certified in June 1998 by the City of Los Angeles (referred to hereafter as the 1998 Final SEIR). This IS has been prepared to address potential adverse environmental impacts associated with the SGPREP pursuant to CEQA Guidelines § 15152.

PROJECT LOCATION

The project site is located within the boundaries of the Sunshine Canyon Landfill, which is surrounded by unincorporated areas of the County of Los Angeles to the north and west and the communities of Granada Hills and Sylmar to the south and east, respectively. The landfill is approximately 0.75 mile southwest of the intersection of the Golden State Freeway (Interstate 5) and Antelope Valley Freeway (SR-14) multi-level freeway interchange. The entrance to the landfill is situated 0.75 mile northwest of the intersection of Balboa Boulevard and San Fernando Road in the City of Los Angeles. More specifically, the proposed facility would be located in the northern portion of the landfill within an unincorporated area of the County of Los Angeles (**Figure 1 -1**). The renewable energy facility, which is proposed by Sunshine Gas Producers, LLC, would be located on the northern end of the landfill area approximately 1.7 miles from residential communities located immediately south of Sunshine Canyon Landfill, within the existing landfill footprint and outside of the lined area of the landfill that contains municipal solid waste (**Figure 1-2).**

The current land use designation within the City's jurisdiction is "heavy industrial," with a zoning designation of M3-1-O (Heavy Industry). Within the County portion of the landfill, the land use designation is "Hillside Management, Non-Urban Hillside," and "Residential," and the corresponding zoning is A-2-2 (Heavy Agriculture, 2-Acre Minimum Lot Size). In the County portion, an amended conditional use permit is in effect, the details of which are described in the Project Background Section, above. The surrounding area is zoned "Open Space" in the city jurisdiction and "Hillside Management" and "Residential" in the county jurisdiction.

PROJECT DESCRIPTION

Sunshine Canyon Landfill is an existing Class III non-hazardous landfill facility that accepts municipal solid waste and is not a generator of, or repository for, hazardous wastes. The landfill covers approximately 451 acres and is located partially within the City of Los Angeles and partially within the County of Los Angeles (see **Figure 1-1**). Landfills are an essential public service based on Rule 1302. The maximum daily tonnage of all materials that may be received at the facility, including municipal solid waste (MSW) for disposal and materials received for beneficial reuse and recycling is 12,100 tons per day. The remaining capacity of the landfill is 111,200,000 cubic yards, and the closing date for the landfill is estimated for December 2037. No component of the currently proposed project includes expanding the landfill capacity or increasing the amount of waste that can be accepted on a daily, monthly or annual basis.

The decomposition of MSW produces methane gas, also known as landfill gas (LFG). According to the U.S. Environmental Protection Agency, landfills are the largest human-related source of methane in the U.S., accounting for 34% of all methane emissions. Methane is generated in landfills and open dumps as waste decomposes under anaerobic (without oxygen) conditions. The amount of methane created depends on the quantity and moisture content of the waste and the design and management practices at the site. In order to prevent LFG from migrating into the atmosphere and contributing to local smog and global climate change and causing a possible detriment to public health, LFG from the Sunshine Canyon Landfill is currently collected and destroyed via three flares pursuant to the SCAQMD's Rule 1150.1.

SGP is proposing to develop and operate a gas turbine electricity generation facility powered by renewable energy at the Sunshine Canyon Landfill. The renewable energy facility would utilize LFG as its fuel. The energy produced from landfills helps contribute to the achievement of the State of California's mandated Renewables Portfolio Standard, which requires electrical utilities to achieve a 33% renewable energy target by 2020 (California Governor's Executive Order S-14-08). In the proposed project, waste landfill gas that is currently flared would be used to generate electricity, thereby displacing non-renewable fossil fuel electrical generation, resulting in a net reduction in future criteria pollutant and greenhouse gas emissions from non-renewable projects.

The LFG from Sunshine Canyon Landfill is currently being recovered through the use of three blower systems and is destroyed in one of three existing enclosed flares that have been issued permits from the SCAQMD. The renewable energy facility would be located on property leased from BFI, the operators of the landfill, on the northern end of the landfill property located approximately 1.7 miles away from the residential communities immediately south of Sunshine Canyon Landfill. The existing flares would be maintained by Sunshine Canyon Landfill and may be operated from time to time whenever it is necessary to shut down the turbines for maintenance and when collected landfill gas volumes exceed the fuel requirements of the turbines.

The project site is located inside the boundary of the existing grading permit for the landfill and is on soil that has been previously disturbed by work at the landfill. The placement of waste at the landfill is confined within an area that is lined to prevent waste from leaching into the soil. The project site is outside of the lined area that contains waste (see **Figure 1-2**), but within the landfill property boundary. The proposed project facility would involve the utilization of

methane-rich gas extracted from the landfill as fuel in gas turbines to drive electricity generators. The proposed project would generally consist of five gas turbine electricity generator sets, LFG compressors, gas treatment equipment, a small enclosed flare, two substations, two buildings, and a parking lot.

The proposed project would be located on a portion of the northwest property of the Sunshine Canyon Landfill (**Figures 1-2** and **1-3**). The proposed project facility would be equipped with five Solar Turbines Mercury 50 gas turbine electricity generator sets that have a total gross electricity generation capacity of 24.5 Megawatts (MW), and a net output of 20 MW. The gas turbines would be fueled with LFG that is recovered from the Sunshine Canyon Landfill, transferred to the SGP facility and treated (filtered, dewatered, and compressed) prior to combustion. The gas treatment process would include a siloxane removal system that would be regenerated on site and a new enclosed ground flare to control the regenerated waste gas from the siloxane removal system (see **Figure 1-4**). The regeneration flare would be completely enclosed and no flame would be visible. The proposed project would also involve relocation of a BFI internal power pole at Flare 8 and installation of new transmission power poles to the project site from the Southern California Edison (SCE) transmission line on the landfill, as well as a new SCE substation (see **Figure 1-5**).

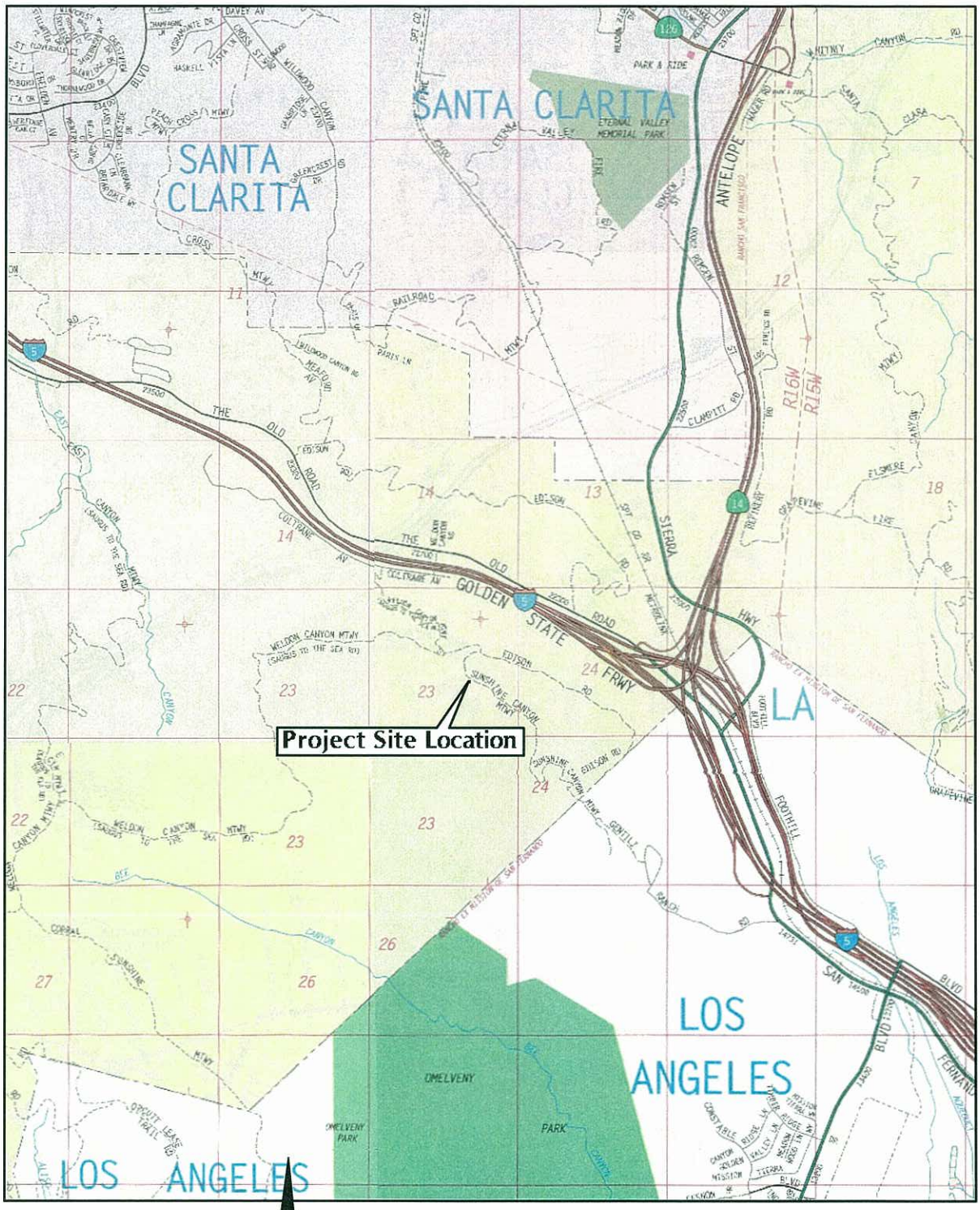
LFG would be supplied to the SGP compression and treatment equipment by a pipe that is connected to the existing LFG collection system header installed for the County portion of the landfill. Prior to startup of the proposed electrical generation facility, the City and County LFG collection systems would be connected such that all LFG collected would be routed to the common gas header to be treated and compressed at the proposed project facility. The treated and compressed LFG would be piped to the gas turbine generator sets for combustion. When the electrical generation facility is operating, the existing flares would normally be off as the current landfill gas volumes are below the maximum capacity of the turbines. However, the existing flares would be maintained by Sunshine Canyon Landfill and may be operated from time to time whenever it is necessary to shut down the turbines for maintenance and when collected landfill gas volumes exceed the fuel requirements of the turbines.

The supply of landfill gas collected from the Sunshine Canyon Landfill is expected to continue to increase until the year 2038 (peak of gas curve), at which point the supply of gas will level off and begin to decrease thereafter. The maximum gas recovered at the peak of the gas curve is expected to be 16,100 standard cubic feet per minute (scfm) at 50% methane content. The electrical generation facility would have an average capacity of 9,700 scfm and a maximum capacity of 11,500 scfm. Therefore, at 2022, it is expected that the gas supply will exceed the capacity of the electrical generation facility. From this point forward, the excess gas that cannot be consumed by the turbines must be flared pursuant to the SCAQMD's Rule 1150.1. An additional landfill gas to energy project may be completed at some point in the future if additional LFG becomes available. Any future project would be the subject of a separate CEQA review.

The analysis of the environmental topics in Chapter 2 of this IS suggests that the SGPREP would result in potentially significant cumulative environmental effects to air quality because the impacts of emissions from the combustion of the landfill gas in turbines and the siloxane regeneration system would result in impacts to air quality that were not studied in the City's

1999 Final SEIR for Sunshine Canyon Landfill. Aside from air quality impacts from the turbines, the project would not create any new impacts or substantially worsen the impacts of the previous project. Therefore, the SCQAMD concludes that the project would not have any significant environmental impacts other than air quality impacts and potentially noise related impacts, and additional information is required to fully evaluate wastewater management and utility tie-in locations. Based on this conclusion, it appears that a focused SEIR is necessary to complete the environmental review process of the proposed SGPREP.

Regarding the previous project, the City concluded that all impacts of the landfill project except for the regional cumulative air quality impact were less than significant after mitigation. As to the air quality impact, the City found that the impact could not be feasibly mitigated below a level of significance, and it adopted a Statement of Overriding Considerations in compliance with CEQA. The California Court of Appeal upheld these conclusions.



Source: Thomas Guide®

SUNSHINE GAS PRODUCERS
RENEWABLE ENERGY PROJECT

INITIAL STUDY

SITE VICINITY MAP

ARCADIS

FIGURE
1-1

CITY:(Read) DIV/GROUP:(Read) DB:(Read) LD:(Opt) PIC:(Opt) PMI(Read) TM:(Opt) LYR:(Opt)ON=*OFF=*REF*
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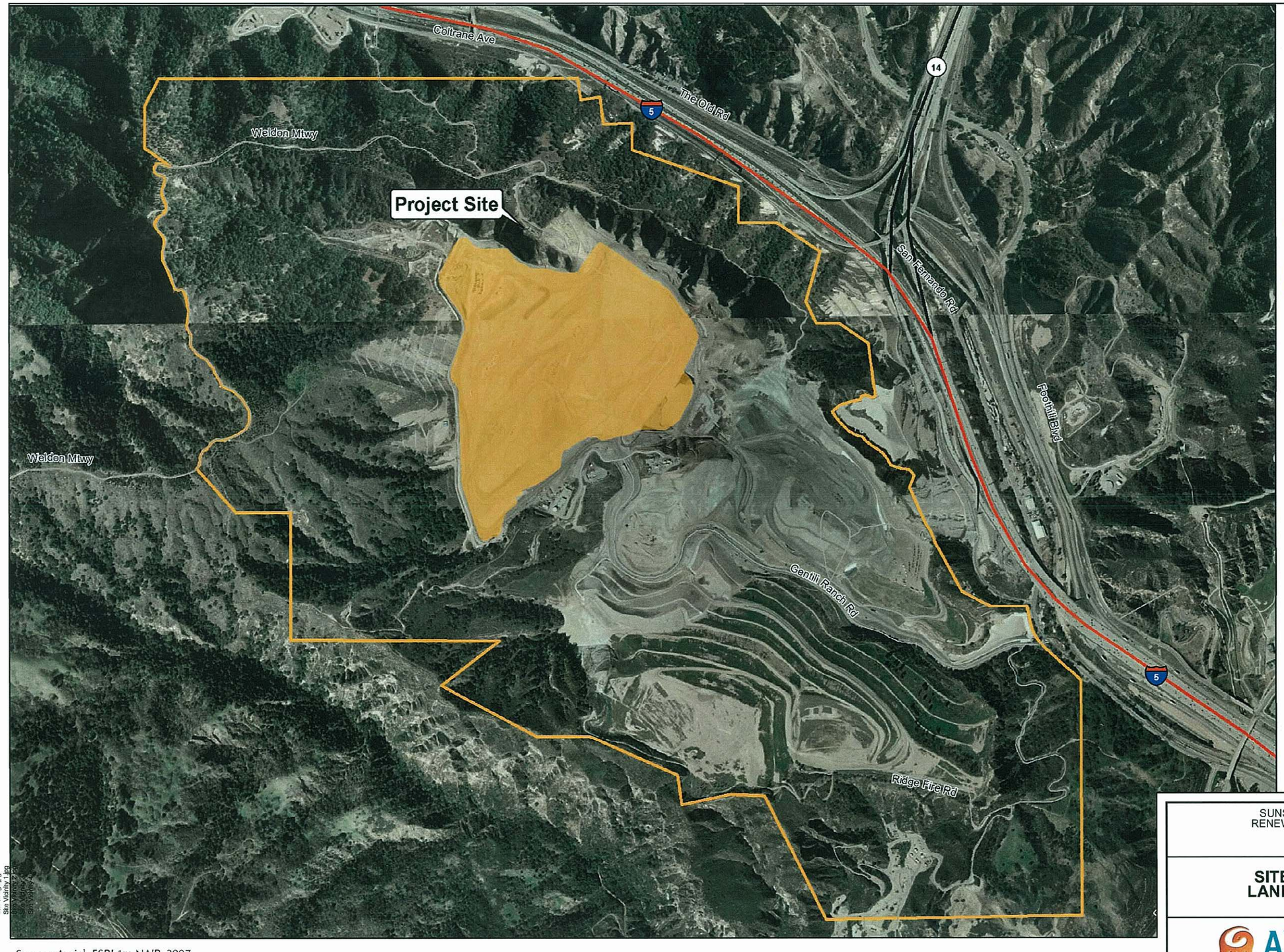
Site Image.jpg
Site Vicinity 1.jpg
Site Vicinity 2.jpg
Site Vicinity 3.jpg
Site Vicinity 4.jpg



LEGEND

- Interstate
- State Highway
- Road
- Approximate Limits of Existing Liner - County Landfill
- Landfill Boundary

N

0 500 1,000 1,500

Feet

Scale: 1:12,000

Source: Aerial- ESRI 1m NAIP, 2007

SUNSHINE GAS PRODUCERS
RENEWABLE ENERGY PROJECT

INITIAL STUDY

SITE LOCATION AND LANDFILL BOUNDARY

ARCADIS

FIGURE
1-2

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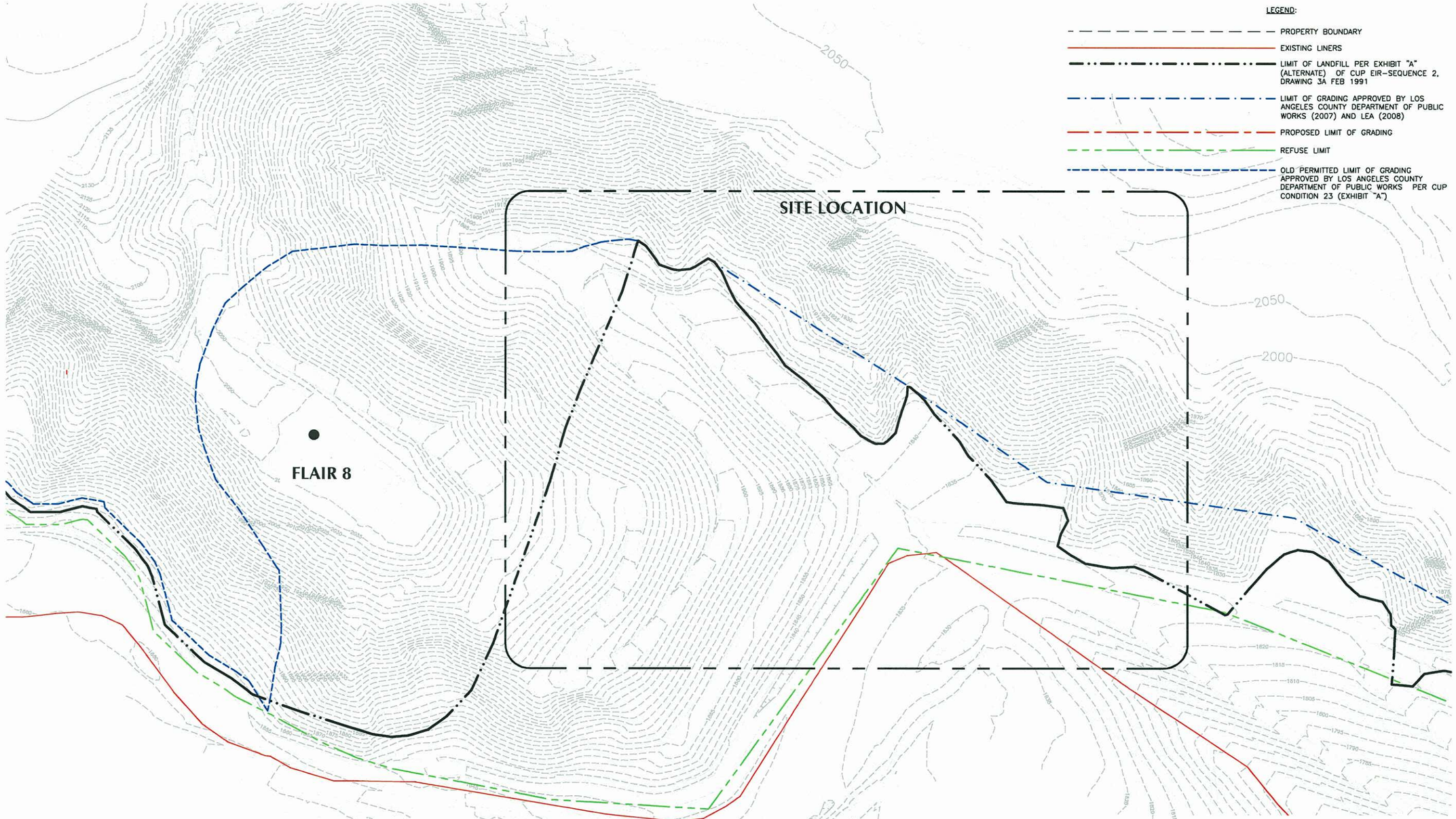
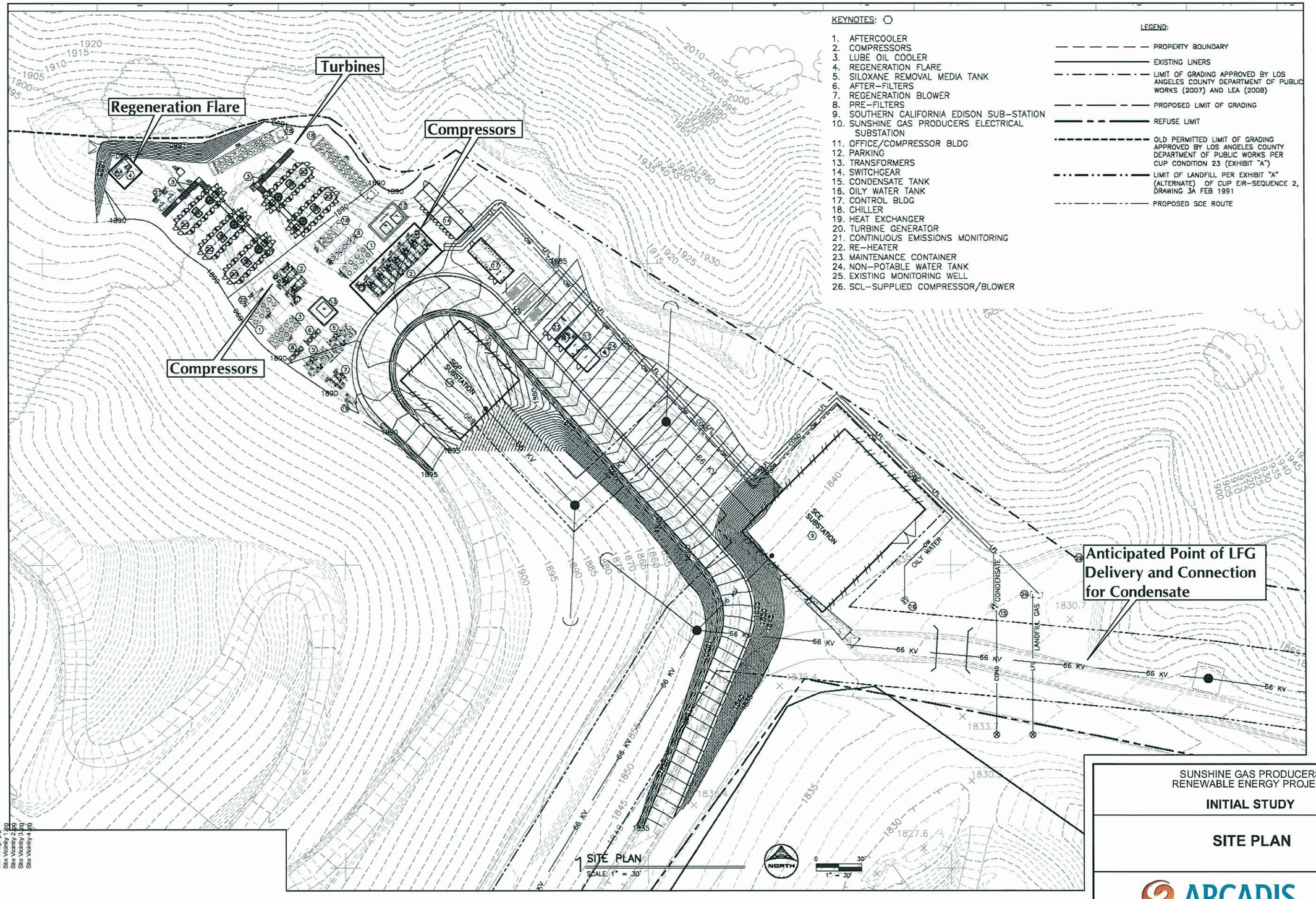


SUNSHINE GAS PRODUCERS
RENEWABLE ENERGY PROJECT
INITIAL STUDY

OVERALL SITE PLAN LOCATION

ARCADIS

FIGURE
1-3



KEYNOTES:

1. AFTERCOOLER
2. COMPRESSORS
3. LUBE OIL COOLER
4. REGENERATION FLARE
5. SILOXANE REMOVAL MEDIA TANK
6. AFTER-FILTERS
7. REGENERATION BLOWER
8. PRE-FILTERS
9. SOUTHERN CALIFORNIA EDISON SUB-STATION
10. SUNSHINE GAS PRODUCERS ELECTRICAL SUBSTATION
11. OFFICE/COMPRESSOR BLDG
12. PARKING
13. TRANSFORMERS
14. SWITCHGEAR
15. CONDENSATE TANK
16. OILY WATER TANK
17. CONTROL BLDG
18. CHILLER
19. HEAT EXCHANGER
20. TURBINE GENERATOR
21. CONTINUOUS EMISSIONS MONITORING
22. RE-HEATER
23. MAINTENANCE CONTAINER
24. NON-POTABLE WATER TANK
25. EXISTING MONITORING WELL
26. SCL-SUPPLIED COMPRESSOR/BLOWER

LEGEND:

- PROPERTY BOUNDARY
- EXISTING LINERS
- LIMIT OF GRADING APPROVED BY LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS (2007) AND LEA (2008)
- PROPOSED LIMIT OF GRADING
- REFUSE LIMIT
- OLD PERMITTED LIMIT OF GRADING APPROVED BY LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS PER CUP CONDITION 23 (EXHIBIT "A")
- LIMIT OF LANDFILL PER EXHIBIT "A" (ALTERNATE) OF CUP EIR-SEQUENCE 2, DRAWING 3A FEB 1991
- PROPOSED SCE ROUTE

Source: Howard R Green Company

SUNSHINE GAS PRODUCERS
RENEWABLE ENERGY PROJECT

INITIAL STUDY

SITE PLAN

ARCADIS

FIGURE
1-4

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Site Vicinity 2.jpg
Site Vicinity 3.jpg
Site Vicinity 4.jpg

POWER GENERATION FACILITY

75'

75'

75'

75'

TREES

DENSE TREES

DIRT

2050

2000

1950

1900

1850

1800

1750

1700

2036.0

1770

50' EASEMENT

EXPLANATION:

Proposed 66 KV transmission lines

Existing transmission lines

0 200 Feet

SUNSHINE GAS PRODUCERS
RENEWABLE ENERGY PROJECT

INITIAL STUDY

TRANSMISSION LINE LOCATION

ARCADIS

FIGURE
1-5

CONSTRUCTION SCHEDULE

Due to recent litigation, there is currently a moratorium on providing emission offsets for exempt projects under SCAQMD Rule 1304 and projects that would obtain emission offsets pursuant to Rule 1309.1. Because the project is considered to be an essential public service as defined in Rule 1302, approval of permits is dependent on the results of an appeal to the Superior Court's decision or re-adoption of proposed Rule 1315.

The current project schedule is based on completion of CEQA review and air permitting by June 2010. The site construction is forecasted to begin in late July 2010 with initial civil work and site grading, followed by concrete placement and conduit and piping installation from August 2010 through March 2011. Major pieces of equipment would begin arriving on site in the second half of 2010 and the plant is forecast to be substantially complete in June 2011. The startup is forecast to take place in June 2011 and July 2011, with the plant being operational by July 30, 2011. Overall construction estimates are from 8 to 12 months depending on equipment deliveries, weather, and other outside factors that affect the construction schedule.

PROJECT ALTERNATIVES

Pursuant to CEQA Guidelines §15126.6, the Subsequent EIR (SEIR) to be prepared for this project will identify and compare the relative merits of a range of reasonable alternatives to the proposed project. The project alternatives will consider other possible means of feasibly attaining the objectives of the proposed project that would avoid or substantially lessen significant effects of the proposed project. The alternatives will be developed by varying basic components of the proposed project. The "No Project" alternative will also be evaluated.

Alternatives must include realistic measures for attaining the basic objectives of the proposed project and provide a means for evaluating the comparative merits of each alternative. Alternatives should be designed to mitigate the significant adverse environmental impacts of the project. In addition, the range of alternatives must be sufficient to permit a reasoned choice and it need not include every conceivable project alternative. The key issue is whether the selection and discussion of alternatives fosters informed decision making and public participation. A CEQA document need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. Suggestions on alternatives submitted by the public will be evaluated for inclusion in the Draft SEIR.

SGP previously evaluated the potential for a pipeline that would originate at the Sunshine Canyon Landfill and terminate at the Berry Petroleum Production field located just off Sierra Highway east of Santa Clarita, California. The pipeline would have transported landfill gas for beneficial reuse. The pipeline route would have extended from the north side of the landfill, across Interstate 5, south along The Old Road to the SR-14 Exit ramp, and then the pipeline would have followed the SR-14 exit ramp to the Sierra Highway overpass and down the hill to the Sierra Highway. The pipeline would have followed Sierra Highway from that location to the Berry Petroleum Production facility, where it would have been used as an alternative fuel in place of natural gas. The pipeline project would have disturbed a larger overall land area than the proposed turbine project due to the need to excavate along the existing roads to install the pipeline and would have affected local traffic flows throughout the construction of the pipeline. The pipeline project posed several technical risks including the need to drill from the landfill

under Interstate 5 and install the pipeline over an existing Los Angeles aqueduct supply line without interrupting the water supply. Due to the technical difficulties and risks posed by the pipeline, which were greatly outweighed by the benefits of an on-site electric generation facility, the power project was chosen for advancement over the pipeline.

An alternative to the proposed plant location would be to place the turbines on the ridge at Flare 8. There are several geotechnical stability concerns with the ridge that would require extensive modifications to the roadway to Flare 8 and the side slopes of the ridge. Due to the technical difficulties and estimated installation costs, the single lower plant site was chosen for advancement.

An alternative to the proposed plant would be to install a plant smaller than the five-turbine plant proposed, which would have proportionally reduced emissions and slightly reduced area required for the plant. However, the beneficial use of the landfill gas would be proportionally reduced and the remaining landfill gas would continue to be flared, resulting in a loss to the community of the potential renewable energy from the LFG.

An additional project alternative includes the configuration of the connection of the proposed project substation to the SCE transmission system, as shown on **Figure 1-5**. The alternative to the proposed transmission line connection would be to connect the existing 66 kilovolt (kV) transmission line through an extension of the line from existing electric poles located on the north side with new poles that will have two sets of power line. This alternative would essentially utilize power poles that are currently under environmental review for the Sunshine Canyon Landfill. With respect to the proposed project, the proposed transmission line and the alternative transmission line are the same. Under both scenarios, the two sets of power lines would be required to allow for the safe operation of the project facility and the SCE transmission line. This would result in an altered utility system that would be built by SCE and incorporated into their transmission system. However, the SCE transmission system is large relative to the proposed project transmission line and these changes would not result in a substantially altered transmission system.

No Project Alternative – If a beneficial use project is not installed, the landfill gas would continue to be flared as required by regulations. The community would lose the benefit of the renewable energy from the landfill gas, and current emissions from the flares would continue.

CHAPTER 2

ENVIRONMENTAL CHECKLIST

Introduction
General Information
Potentially Significant Impact Areas
Determination
Environmental Checklist and Discussion

INTRODUCTION

The environmental checklist provides a standard evaluation tool to identify a project's adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts associated with the implementation of the Sunshine Gas Producers Renewable Energy Project.

GENERAL INFORMATION

Project Title:	Sunshine Gas Producers Renewable Energy Project
Lead Agency Name:	South Coast Air Quality Management District
Lead Agency Address:	21865 Copley Drive, Diamond Bar, CA 91765
CEQA Contact Person and Phone Number:	Jeff Inabinet, Air Quality Specialist – CEQA Section South Coast AQMD 909-396-2453
Project Sponsor's Name:	Sunshine Gas Producers LLC
Project Sponsor's Address:	Ann Arbor, Michigan
Project Sponsor's Contact Person and Phone Number:	Michael Mann (734) 913-2977
General Plan Designation:	County designation: Hillside Management, Non-Urban Hillside and Residential (Non-Urban). City designation: Heavy Industrial
Zoning:	County: A-2-2 (Heavy Agricultural, 2-Acre Minimum Lot Size). City: M3-1-O (Heavy Industrial)
Description of Project:	SGP is proposing to develop and operate a gas turbine electricity generation facility at the Sunshine Canyon Landfill utilizing otherwise flared LFG. The electricity generation facility would be located on property leased from BFI, the operators of the landfill, on the northern end of the landfill property away from the residential communities immediately south of Sunshine Canyon Landfill. This site is within the existing landfill grading permit and outside of the lined area that contains municipal solid waste. The proposed facility would involve the utilization of methane-rich gas extracted from the landfill as fuel in gas turbines to drive electricity generators and would consist of five gas turbine electricity generator sets that have a total gross electricity generation capacity of 24.5 MW and a net output of

Description of Project (continued):

20 MW. The gas turbines would be fueled with LFG that is recovered from the Sunshine Canyon Landfill, transferred to SGP, and treated (filtered, dewatered, and compressed) prior to combustion. The gas treatment process would include a siloxane removal system that would be regenerated on-site and an enclosed ground flare to control the regenerated waste gas. The LFG is currently being recovered through the use of three blower systems and enclosed flares that have been issued permits from the SCAQMD. The proposed project would also involve relocation of a BFI internal power pole and installation of new transmission power poles to the project site from the SCE transmission line on the landfill and an SCE substation.

Sunshine Canyon Landfill is an existing Class III non-hazardous landfill facility and is not a generator of, or repository for, hazardous wastes. The maximum daily tonnage of all materials that may be received at the facility, including MSW, for disposal and materials received for beneficial reuse and recycling is 12,100 tons per day. The remaining capacity of the landfill is 111,200,000 cubic yards, and the closing date for the landfill is estimated for December 2037. No component of the currently proposed project includes expanding landfill capacity or increasing the amount of waste that can be received on a daily, monthly, or annual basis.

SGP plans to construct an electrical generation facility that would use methane gas extracted from the landfill as fuel in gas turbines to drive electricity generators. The proposed facility would consist of LFG treatment equipment for compression, gas dewatering, filtration, and siloxane removal, five turbine engines connected to individual electricity generators, and ancillary equipment.

The LFG compressors, gas treatment equipment, and enclosed flare would be located on a portion of the northwest property of the Sunshine Canyon Landfill near the existing stormwater retention basin. LFG would be supplied to the Sunshine Gas Producers compression and treatment equipment by a pipe that is connected to the existing LFG collection system header installed for the County portion of the landfill. Prior to startup of the proposed electrical generation facility, the City and County LFG collection systems would be tied together such that all LFG collected would be routed to the common gas header. The treated and compressed LFG would be piped to the gas turbine generator sets located on the canyon ridgeline near existing flare number 8.

Surrounding Land Uses and Setting:	Industrial, commercial, residential, and manufacturing.
Other Public Agencies Whose Approval is Required:	City of Los Angeles, County of Los Angeles

POTENTIALLY SIGNIFICANT IMPACT AREAS

The following environmental impact areas have been assessed to determine their potential to be affected by the proposed project. As indicated by the checklist on the following pages, environmental topics marked with a "✓" may be adversely affected by the proposed project. An explanation relative to the determination of impacts is provided following the checklist for each area.

☐ Aesthetics	☐ Agricultural Resources	☑ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Hazards & Hazardous Materials	☐ Hydrology/Water Quality
☐ Land Use/Planning	☐ Mineral Resources	☑ Noise
☐ Population/Housing	☐ Public Services	☐ Recreation
☐ Solid/Hazardous Waste	☐ Transportation/ Traffic	☑ Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

- ☐ I find the proposed project COULD NOT have a significant effect on the environment, and that a **NEGATIVE DECLARATION** will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be significant effects in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project MAY have a significant effect(s) on the environment, and a Supplemental **ENVIRONMENTAL IMPACT REPORT** is required.
- ☑ I find that the proposed project MAY have a "potentially significant impact" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: 11/17/09 Signature: Steve Smith

Steve Smith, Ph.D.
Program Supervisor, CEQA
Planning, Rule Development and Area Sources

ENVIRONMENTAL CHECKLIST AND DISCUSSION

		Potentially Significant Impact	Less Than Significant Impact	No Impact
I.	**AESTHETICS.** Would the project:			
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☑
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☑
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☑
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☑

AESTHETICS DISCUSSION

Aesthetic impacts for combining the City and County landfills and associated operations were analyzed in the 1998 SEIR. The environmental aesthetic impacts of the City/County landfill project had to do directly with the visibility of landfilling operations from either the I-5 Freeway or I-210 Freeway; and during latter stages of the landfill operations, visibility of the City/County landfill from the upper elevations of the existing O'Melveny Park hiking and equestrian trail. Mitigation measures were identified to reduce the significant impacts identified for the City/County landfill project to less than significant levels. These mitigation measures are summarized in the current MMRS (**Appendix 1-1**). The proposed project would adopt the mitigation measures summarized in the MMRS to ensure compliance with the current landfill CUP requirements, although the aesthetic impacts identified for the City/County landfill project and associated mitigation measures are not directly applicable to the proposed project. The following mitigation measure identified for visual impacts due to lighting would apply:

- All lighting shall be shielded and directed onto the site; no floodlighting shall be located that can be seen directly by adjacent residents, motorists on adjacent public streets or highways, or pilots within the Airport Approach Zone. This condition shall not preclude the installation of low-level security lighting.

Significance Criteria

The proposed project impacts on aesthetics will be considered significant if:

- The project will block views from a scenic highway or corridor;
- The project will adversely affect the visual continuity of the surrounding area; or

- The impacts on light and glare will be considered significant if the project adds lighting which would add glare to residential areas or sensitive receptors.

As described below, there are no aesthetics impacts associated with the proposed project. Therefore, the proposed project would not make significant impacts associated with the City/County landfill project substantially worse or create new significant impacts.

I. a) The proposed project is not located on or adjacent to a scenic highway or within a scenic corridor. The existing flare on the northern portion of the landfill (Flare 8) is visible for a split second to motorists traveling northbound on the Interstate 5 Freeway at normal highway speeds. However, overall views of the landfill are generally blocked by existing structures, topography, and landscaping. The new facility would be located in a canyon and the exhaust stacks and flare would have minimal visibility from any view outside of the landfill.

The proposed project would not result in any new impacts to visual quality. The proposed project would not block views from a scenic highway or corridor, and is unlikely to be visible even for a split second from the Interstate 5 Freeway due to the distance from the freeway (over two miles away), the project's relatively small project footprint and low profile (less than one acre disturbed and 26.5 feet high at its highest point), and the topography of the area. The visual impacts of the development of the Sunshine Canyon Landfill were mitigated to a less than significant level through the implementation of mitigation measures that involved the planting of a significant number of oak trees to replace those that had been removed for the development of the landfill. The proposed project, which is located in a previously disturbed section of the landfill, would not impact any oak trees and would not degrade a view shed identified in the previous environmental review documents. Accordingly, the proposed project would not have any significant visual impacts. Therefore, no further analysis of this issue is required.

I. b) The project site is located within an existing landfill that has been in existence since 1958. Therefore, the site is already disturbed and does not contain exceptional aesthetic characteristics that would warrant preservation. The project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. The proposed project siting and operation would not impact the visual environment beyond that already described in the FEIR and SEIR. Therefore, no further analysis of this issue is required.

I. c) The proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings. The project would be sited on the northern portion of the Sunshine Canyon Landfill that is currently highly disturbed with visually degraded landscape due to solid waste disposal and public utility uses of the site. The project proponent is proposing to construct an electricity generating facility that would generate electricity with the flared LFG. The project would not significantly increase the impacts identified in the previous environmental review documents. Therefore, no further analysis of the issue is required.

I. d) The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The project would be constructed on the northern portion of the Sunshine Landfill Canyon, away from sensitive receptors, and away from structures or land uses that would be affected by any potential light, shadow, or glare. In addition, the project would be no more than two stories tall and would be constructed using

materials that would not result in light and glare impacts. Therefore, no further analysis of the issue is required.

Based on these considerations, significant adverse aesthetic impacts are not anticipated and will not be further analyzed in the Draft SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

		Potentially Significant Impact	Less Than Significant Impact	No Impact
II.	**AGRICULTURAL RESOURCES.** Would the project:			
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☑
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☑
c)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☑

AGRICULTURAL RESOURCES DISCUSSION

Environmental impacts associated with agricultural resources were not identified as a project issue in the 1993 FEIR or the 1998 SEIR.

Significance Criteria

Project-related impacts on agricultural resources will be considered significant if any of the following conditions are met:

- The proposed project conflicts with existing zoning or agricultural use or Williamson Act contracts;
- The proposed project will convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, to non-agricultural use; or
- The proposed project would involve changes in the existing environment, which due to their location or nature, could result in conversion of farmland to non-agricultural uses.

II. a) - c) The proposed project would not result in a change in land use or otherwise impact agricultural resources. The project site is not located on agricultural land designated as land under a Williamson Act Contract. The current zoning on the County portion of the site on which

the proposed project would be located is A-2-2 (heavy agricultural). However, a conditional use permit is in effect for this area which allows industrial uses, including the proposed electrical generation facility. Because the CUP is in effect, the proposed project would not require a change in land use that would convert an existing farmland to a non-agricultural use and no impacts would occur. Therefore, no further analysis of the issue is required.

The proposed electricity generating facility would be located on a site that is highly disturbed and currently used for solid waste disposal/public utility. Therefore, no further analysis of this issue is required.

Based on these considerations, significant agricultural resource impacts are not anticipated and will not be further analyzed in the Draft SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

		Potentially Significant Impact	**Less Than Significant Impact**	**No Impact**
III.	**AIR QUALITY.** Would the project:			
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☑	☐	☐
b)	Violate any air quality standard or contribute to an existing or projected air quality violation?	☑	☐	☐
c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	☑	☐	☐
d)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☑
e)	Create objectionable odors affecting a substantial number of people?	☐	☐	☑
f)	Diminish an existing air quality rule or future compliance requirement resulting in a significant increase in air pollutant(s)?	☑	☐	☐
g)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?	☑	☐	☐

		Potentially Significant Impact	Less Than Significant Impact	No Impact
h)	Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☑	☐	☐

AIR QUALITY DISCUSSION

It is the responsibility of the SCAQMD to ensure that state and federal ambient air quality standards are achieved and maintained in its geographical jurisdiction. Health-based air quality standards have been established by California and by the federal government for the following criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter with a mean diameter less than 10 microns (PM_{10}) and particulate matter with a mean diameter of less than 2.5 microns ($PM_{2.5}$), sulfur dioxide (SO_2), and lead. A new standard for ozone was recently adopted by the United States Environmental Protection Agency (U.S. EPA) and the state NO_2 standard was recently revised. Furthermore, California has additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility. Attainment of the state and federal ambient air quality standards protects sensitive receptors and the public in general from the criteria pollutants that are known to have adverse human health effects. These standards are established to protect sensitive receptors within a margin of safety from adverse health impacts due to exposure to air pollution.

Previous environmental analyses of the City/County landfill project have resulted in the development of a detailed MMRS that is designed to reduce potentially significant air quality impacts of various landfill activities to less than significant levels. The proposed project would implement applicable mitigation measures to ensure compliance with the current landfill CUP requirements. With regard to air quality impacts, the following mitigation measures apply directly to the proposed project:

- The permittee shall utilize the most effective available technology and methodology to avert fugitive dust emissions. In addition to the revegetation measures required in Condition 41 and in the MMRS, the program shall include:
    - The permittee shall not engage in any excavation or other operation during high wind conditions, or when such conditions may be reasonably expected, that would result in significant emissions of fugitive dust which cannot be confined to the area under the permittee's control. *(This mitigation measure would be applicable during construction activities for the proposed project. Due to the location of the proposed project within a small canyon area, an analysis of fugitive dust emissions and wind speed within the area of project construction will be presented in the Draft SEIR to determine the appropriate wind speed required to reduce significant emissions of fugitive dust during high wind conditions).*
    - All access roads to permanent facilities, except those infrequently used, shall be paved. *(This mitigation measure would be applicable to the portion of road that extends access from the currently used perimeter road to the proposed facility).*

- The landfill will be operated in accordance with SCAQMD Rule 1150.1 and other SCAQMD regulations and with applicable Department of Public Works requirements.
- Flaring systems shall be sited as required by the SCAQMD and constructed using BACT. The flames shall be totally contained within the stack. Flame arrestors shall be provided to the satisfaction of the SCAQMD and the County Forester and Fire Warden. The permittee will convert gas, as it is recovered, to a renewable energy resource and to the extent technically and economically feasible.
- The following mitigation measures will reduce emissions to the maximum extent reasonably feasible:
    - The permittee will maintain equipment in tune per manufacturer's specifications.
    - The permittee will use catalytic converters on gasoline-powered equipment. (*In general, only small gasoline-powered equipment would be utilized at the site. This mitigation measure would be implemented to the extent practical, as catalytic converters may not be available for purchase for certain types of small equipment*).
    - The permittee will tune all diesel engines to manufacturer's specifications.
    - High-pressure fuel injectors will be installed.
    - Heavy equipment will use reformulated, low-emission diesel fuel.
    - The permittee will substitute diesel-powered equipment with electric and gasoline-powered equipment where feasible.
    - Where applicable, equipment will not be left idling for prolonged periods.
    - The permittee will curtail (cease or reduce) construction during periods of high ambient pollutant concentrations (i.e., Stage II smog alerts).

Requirements for mitigation measures including monitoring actions, responsibility, and other requirements are listed in **Appendix 1-1**.

Significance Criteria

The following impact analyses consider the current conditions baseline as continued flaring of the recovered landfill gas using the enclosed flares owned by Sunshine Canyon Landfill based on the landfill gas generation and recovery curve provided by Sunshine Canyon Landfill to estimate landfill gas recovery through the year 2025 (compliant with the Los Angeles County planning horizon). To determine whether or not air quality impacts from implementing the proposed project are significant, potential impacts will be evaluated and compared to the criteria listed in **Table 2-1** or the Greenhouse Gas (GHG) significance thresholds presented below. If impacts equal or exceed any of the criteria, they will be considered significant.

Air quality impacts associated with the City/County Landfill project indicated that regional cumulative air quality impacts were less than significant after implementation of applicable

mitigation measures (summarized in **Appendix 1-1**). For project specific air quality impacts associated with the flaring of LFG, the City found that the impact could not be feasibly mitigated below a level of significance, and it adopted a Statement of Overriding Considerations.

The proposed project would not create new significant impacts than those identified in the previous City/County Landfill environmental analyses. With regard to the identified significant impact associated with the flaring of LFG, the proposed project would utilize most, if not all, LFG generated on-site. This implies that, for the most part, LFG would either be flared at one of the permitted flare stations or would be converted to energy at the SGP's facility. Therefore, the proposed project does have the potential to make the recognized significant air quality impact associated with the City/County Landfill operations worse.

TABLE 2-1
SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds		
Pollutant	**Construction**	**Operation**
NO_x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk $\geq$ 10 in 1 million Hazard Index $\geq$ 1.0 (project increment) Hazard Index $\geq$ 3.0 (facility-wide)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality for Criteria Pollutants[(a)]		
NO_2 1-hour average annual average	In attainment; significant if project causes or contributes to an exceedance of either of the following standards: 0.25 parts per million (state) 0.053 parts per million (federal)	
PM_{10} 24-hour average annual geometric average annual arithmetic mean	 10.4 µg/m^3 (recommended for construction)[(b)] 2.5 µg/m^3 (operation) 1.0 µg/m^3 20 µg/m^3	
Sulfate 24-hour average	 25 µg/m^3	
CO 1-hour average 8-hour average	In attainment; significant if project causes or contributes to an exceedance of either of the following standards: 20 parts per million (state) 9.0 parts per million (state/federal)	

(a) Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.
(b) Ambient air quality threshold based on SCAQMD Rule 403.
µg/m^3 = microgram per cubic meter; lbs/day = pounds per day; $\geq$ = greater than or equal to
VOC = volatile organic compound

Greenhouse Gas (GHG) Significance Thresholds

SCAQMD adopted an interim GHG significance threshold proposal in December 2008 that uses a tiered approach to determine significance for GHG emissions. Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA. Tier 2 consists of determining whether or not the project is consistent with a GHG reduction plan that may be part of a local general plan, for example. Tier 3 establishes a screening significance threshold level to determine significance using a 90 percent emission capture rate approach, which corresponds to 10,000 metric tons of CO_2 equivalent emissions per year ($MTCO_2$ eq/yr). Tier 4 consists of a decision tree approach that allows the lead agency to choose one of three compliance options based on performance standards.[6] Under Tier 5 the project proponent would implement off-site mitigation (GHG reduction projects) to reduce GHG emission impacts to less than the proposed screening level.

II. a) - c) and f) - h) The proposed project would not conflict with or obstruct implementation of the Air Quality Management Plan published by SCAQMD. The proposed project would not add any dwelling units for residential uses, and would only add two to three employees from the existing employee pool in Southern California. The proposed project would not diminish an existing air quality rule or future compliance requirement, because the proposed project must demonstrate compliance with all applicable SCAQMD rules and regulations before any permit applications can be approved.

Construction Impact Analysis

A preliminary analysis of construction phase emissions was performed based on expected equipment usage. It was assumed that the construction work would take place over a one-year period, with an average of twenty 10-hour days per month. The distance for soil hauling to the site is unknown at this time. Calculations were performed for a short-haul distance of 0.5 roundtrip miles (landfill stockpile) and long-haul distance of 20 roundtrip miles (off-site soil provider). **Table 2-2** provides a comparison of expected construction emissions on a pounds per day basis (assuming that the fill soil can be taken from the landfill stockpile) compared to SCAQMD significance thresholds. **Table 2-3** provides a worst case scenario comparison of expected construction emissions on a pounds per day basis (assuming that the fill soil must be hauled for a roundtrip of 20 miles) compared to SCAQMD significance thresholds.

As the specific model and year of equipment cannot be known at this time, it was assumed that all off-road equipment would meet U.S. EPA Tier 3 emission standards, and all on-road equipment would meet current California Air Resources Board (CARB) on-road emission standards. The haul trucks are assumed to carry 13 cubic yards of soil per trip. The emissions are estimated as maximums for each month, based on an assumed equipment schedule. Note that a full analysis of toxic air contaminants (TACs), SOx and lead emissions were not performed as part of this initial study.

[6] Consideration of the Tier 4 compliance options were deferred until some point in the future and, therefore, they are not currently in effect.

TABLE 2-2
ESTIMATED SHORT-HAUL TRIP CONSTRUCTION EMISSION INVENTORY
(POUNDS PER DAY)

	NOx	VOC	PM_{10}	CO
January Emissions (Excavator, Haul Trucks, Flatbed, Generators)	37.00	2.01	1.83	142.75
February Emissions (Excavator, Haul Trucks, Flatbed, Generators)	37.00	2.01	1.83	142.75
March Emissions (Large Dozers, Excavator, Haul Trucks, Flatbed, Generators)	99.83	5.32	5.14	200.07
April Emissions (Large Dozers, Excavator, Flatbed, Generators)	98.54	5.19	5.11	199.67
May Emissions (Large Dozers, Excavator, Tractor, Flatbed, Generators)	104.95	5.52	5.60	207.99
June Emissions (Large Dozers, Excavator, Tractor, Flatbed, Cranes, Generators)	123.80	6.52	7.06	232.46
July Emissions (Small Dozers, Flatbed, Cranes, Generators)	63.99	3.37	3.75	175.42
August Emissions (Small Dozers, Flatbed, Crane (All Terrain), Generators)	57.70	3.04	3.27	167.26
September Emissions (Small Dozers, Concrete Truck, Flatbed, Crane (All Terrain), Generators)	92.89	4.89	4.59	554.39
October Emissions (Concrete Truck, Flatbed, Paving Equipment, All Terrain Crane, Generators)	115.70	6.09	6.35	584.00
November Emissions (Concrete Truck, Flatbed, All Terrain Crane, Generators)	92.89	4.89	4.59	554.39
December Emissions (Flatbed, Generators)	20.01	1.05	0.97	128.02
CEQA Thresholds of Significance	100	75	150	550

TABLE 2-3
ESTIMATED LONG-HAUL TRIP CONSTRUCTION EMISSION INVENTORY
(POUNDS PER DAY)

	NOx	VOC	PM_{10}	CO
January Emissions (Excavator, Haul Trucks, Flatbed, Generators)	87.27	7.14	3.10	158.27
February Emissions (Excavator, Haul Trucks, Flatbed, Generators)	87.27	7.14	3.10	158.27
March Emissions (Large Dozers, Excavator, Haul Trucks, Flatbed, Generators)	150.10	10.45	6.40	215.59
April Emissions (Large Dozers, Excavator, Flatbed, Generators)	98.54	5.19	5.11	199.67
May Emissions (Large Dozers, Excavator, Tractor, Flatbed, Generators)	104.95	5.52	5.60	207.99
June Emissions (Large Dozers, Excavator, Tractor, Flatbed, Cranes, Generators)	123.80	6.52	7.06	232.46
July Emissions (Small Dozers, Flatbed, Cranes, Generators)	63.99	3.37	3.75	175.42
August Emissions (Small Dozers, Flatbed, Crane (All Terrain), Generators)	57.70	3.04	3.27	167.26
September Emissions (Small Dozers, Concrete Truck, Flatbed, Crane (All Terrain), Generators)	92.89	4.89	4.59	554.39
October Emissions (Concrete Truck, Flatbed, Paving Equipment, All Terrain Crane, Generators)	115.70	6.09	6.35	584.00
November Emissions (Concrete Truck, Flatbed, All Terrain Crane, Generators)	92.89	4.89	4.59	554.39
December Emissions (Flatbed, Generators)	20.01	1.05	0.97	128.02
CEQA Thresholds of Significance	100	75	150	550

As shown, NOx and CO emissions may exceed SCAQMD thresholds if this equipment were used in accordance with the assumed schedule. As a contractor has not been selected for this project, the schedule and equipment assumptions are likely to change.

Construction CO_2 emissions were estimated to be 9,500 tons (short-haul distance) and 9,630 tons (long-haul distance), using Urbemis2007, version 9.2.4. Because of the number of pieces of construction equipment and hours of operation required to install and relocate equipment at the site, construction equipment emissions could exceed the SCAQMD's maximum daily significance threshold for construction. It should be noted that the construction emissions calculated thus far do not include activities associated with the relocation of the BFI internal power pole and installation of new transmission power poles to the project site from the SCE transmission line on the landfill (shown on **Figure 1-5**). However, the preliminary analysis of construction of the plant alone indicates potentially significant impacts to air quality and GHG emissions. Therefore, construction related impacts to air quality and GHG emissions will be further evaluated in the Draft SEIR.

Facility Operation Impact Analysis

Emissions from the proposed electricity generation facility will increase slightly from the current level of emissions generated by the flaring due to differences in the combustion process of the turbines as compared to the flares. In addition, it is expected that LFG production will increase in the future as decomposition of solid waste increases. As the supply of LFG increases, it will eventually exceed the capacity of the turbines in the proposed project. At this point, the excess gas will be flared as required by SCAQMD regulations. The total emissions for NO_2 and CO for the proposed five Mercury 50 turbines and enclosed flare are expected to be higher than the emissions from the existing flares. An enclosed flare controls NO_2 emissions through maintaining a flame temperature to minimize NO_2 formation. CO formation is controlled in a flare by a high residence time (the time that the exhaust gas is in the combustion chamber) which results in the CO converting to CO_2.

There are two primary combustion differences in the turbines compared to the enclosed flare. First, a pilot flame of landfill gas on the turbine is used as the ignition source for the main combustion flame and is adjusted to maintain flame temperature and flame stability. The NO_2 formation in the gas turbine is a result of maintaining flame temperatures for stability that results in higher NO_2 emissions. The second difference is the residence time in the combustion chamber. In a gas turbine, the residence time in the combustion chamber is reduced when compared to an enclosed flare. This results in less time for reduction of the CO to CO_2, resulting in higher emissions than an enclosed flare. For this project, the turbine manufacturer, Solar Turbines, has guaranteed NO_2 levels at below the current waste gas turbine best available control technology (BACT) levels of 25 parts per million (ppm) for NO_2 and 130 ppm for CO. Thus, while the Solar Turbines have the lowest guaranteed NO_2 level of any electrical generation turbine currently on the market, the substitution of the turbines for the existing flares will still result in a slight increase in CO emissions over the existing flares.

In order to analyze air quality impacts due to operation of the proposed project, the current conditions baseline was calculated based on emission rates associated with continued flaring of the recovered landfill gas using the enclosed flares owned by Sunshine Canyon Landfill. A

landfill gas generation and recovery curve provided by Cornerstone Environmental Group was used to estimate landfill gas recovery through the year 2025. Based on direct measurements from three flares taken for 2004 through 2008, criteria air pollutant emission rates (CO, NOx, PM_{10} and SO_2) for the enclosed Sunshine Canyon Landfill flares were calculated based on a mass emission per volume gas combusted basis (pounds per million cubic feet landfill gas, lb/MMcf) using the average measured emission rates. The average measured enclosed flare emission rate for the criteria air pollutant emissions for the Sunshine Canyon Landfill flares and the estimated emission rate for operation of the proposed project is summarized in **Table 2-4**.

TABLE 2-4
ESTIMATED FACILITY OPERATION EMISSION INVENTORY

	Flare Emission Factor (lb/MMcf)	Baseline Flare Emissions (pounds/day)	Renewable Energy Project Emissions (pounds/day)	Difference (pounds/day)
NOx	11.9	166.8	638.5	472
CO	13.2	183.9	857.8	674
ROG	1.8	24.8	107.4	83
SO_2	--	--	--	N/C
PM_{10}	1.8	24.9	112.8	87.9

Sulfur dioxide formation is a function of the amount of sulfur compounds present in the recovered LFG as opposed to combustion technology; therefore there would not be a difference in the amount of sulfur dioxide emitted by the proposed project compared with baseline conditions. Similarly, PM_{10} emissions are somewhat dependent on the particulate matter present in the LFG. Using the PM_{10} emission rate for the enclosed flares with an assumed increase in PM_{10} of 20% that could occur over the course of the proposed project due to future LFG composition, the PM_{10} emissions were modeled based on the proposed siloxane adsorption and regeneration system that would treat the LFG prior to combustion. Based on this analysis, PM_{10} emissions would not exceed the significance threshold for the SCAQMD. However, NOx, CO, and ROG exceed the significance threshold for the SCAQMD and would be a potentially significant impact of the proposed project.

The baseline GHG emission rate for flaring 9,700 scfm gas in the existing Sunshine Canyon Landfill enclosed flares is 351 tons per day. The estimated LFG fuel use rate for the proposed project (9,700 scfm) results in daily GHG emissions of 382 tons, or an increase of 31 tons per day compared to the baseline scenario. However, it should be noted that while operation of the proposed project creates a net increase in GHG emissions at the site, the proposed facility is designed to export up to 20 megawatts (MW) of electricity to local utilities. This will presumably replace 20 MW of electricity generation elsewhere in the greater Los Angeles area that may be produced using fossil fuels.

Because the increase in the baseline criteria pollutant and GHG emissions exceeds the significance threshold set by the SCAQMD, this issue will be further analyzed in the Draft SEIR.

II. d) The proposed project would not expose sensitive receptors to substantial pollutant concentrations. The proposed project is not associated with a school, hospital, public assembly site, or other sensitive use, nor are these types of uses located in proximity to the proposed renewable energy facility. The closest sensitive receptor is the residential community at the southern boundary of the landfill, but the closest residence in this community is located over 1.7 miles away from the proposed project site. The proposed project would involve utilization of methane-rich gas extracted from the existing landfill for electricity generation. The energy facility would not alter the existing land uses on- and off-site and is not expected to generate new risks to sensitive uses that were not previously analyzed in the FEIR and SEIR. Accordingly, the impacts are not expected to be significant. Therefore, no further analysis of this issue is required.

II. e) The proposed project would not create objectionable odors affecting a substantial number of people. LFG does have an odor associated with it; however, the LFG will continue to be collected to prevent escape into the atmosphere either during construction or after the project is operational. During construction, the LFG will continue to be flared, which will neutralize any odor from the LFG. Once the project is operational, the LFG will be directed through the turbines and combusted, thereby neutralizing the odor from the LFG. The proposed electricity generation facility is not anticipated to create obnoxious odors or generate dust. Some odor is expected to be generated by the construction equipment, but these odors would be intermittent and will not be close enough to sensitive receptors to be detected. Dust from construction activities will be controlled through watering as required by the MMRP for the landfill. Therefore, no further analysis of this issue is required. However, as discussed in responses (a), (b), (c), and (f), further analysis of air emissions is required and will be presented in the Draft SEIR to be prepared for this project.

		Potentially Significant Impact	**Less Than Significant Impact**	**No Impact**
IV.	**BIOLOGICAL RESOURCES.** Would the project:			
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☑
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☑

		Potentially Significant Impact	Less Than Significant Impact	No Impact
c)	Have a substantial adverse effect on federally protected wetlands as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☑
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☑
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☑
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☑

BIOLOGICAL RESOURCES DISCUSSION

As identified during environmental analyses of the City/County Landfill project, the Sunshine Canyon Landfill contains some areas with sensitive coastal sage scrub, riparian habitat, and oak woodland habitat, but these habitats are located mostly along the south and southwestern portions of the site and around the outer portions of the Sunshine Canyon Landfill, and are not located near the proposed project site. Additionally, the proposed project is located in a highly disturbed area on the northern portion of the Sunshine Canyon Landfill, where there is no evidence of major riparian or other sensitive habitat present, and where active brush removal is ongoing. Although the project site is generally free of the identified sensitive biological habitats that are present in the Sunshine Canyon Landfill, the proposed project would maintain the mitigation measures summarized in the MMRS to ensure compliance with the current landfill CUP requirements. Note that certain biological monitoring programs have been developed per the Sunshine Canyon Landfill MMRS to satisfy CUP requirements; because the proposed project would not increase the amount of disturbed areas within the footprint of Sunshine Canyon Landfill, additional monitoring locations would not be necessary. The project proponent would utilize previously prepared biological survey reports, as recent monitoring reports may provide important background information relative to the proposed project location. Additionally, the project proponent would work with the Sunshine Canyon Landfill's biologist, as necessary, to ensure that the following mitigation measures are maintained throughout implementation of the proposed project. This cooperative approach to biological resource management would serve as

the mitigation measure for the proposed project. Relevant Sunshine Canyon Landfill's mitigation and monitoring requirements are summarized below:

- In the event the proposed project is required to remove an oak tree or native tree species, or Venturan coastal sage scrub, Mitigation Measures 4.10 through 4.29 (see **Appendix 1-1**) would be applicable to the proposed project.
- Prior to on-site grading activities, various biological surveys are required to determine the status of certain species within development areas including California gnatcatcher, least bell's vireo, and western burrowing owl. If these species are present, on-site grading activities will be conducted in compliance with the applicable Mitigation Measures 4.30 through 4.32.
- Migratory Bird Treaty Act: To prevent the loss of an active migratory bird nest, vegetation shall not be cleared during the breeding season (i.e., March 15 to August 1). If vegetation clearing needs to occur, surveys shall be conducted by biologists to determine active migratory bird nests. All active migratory bird nests shall be protected until the young become independent.
- Items used at the landfill facility that could attract vectors (e.g., food, seed, office supplies, etc.) shall be stored in closed containers and/or within an enclosed structure. These containers shall be inspected regularly and be disposed of if they appear to be an attraction to any vectors.
- All buildings, paved areas, landscaped areas, and perimeter areas shall be inspected regularly for signs of vectors. Any building openings, ground holes, and deficiencies shall be repaired as they are discovered during routine inspections to prevent the intrusion of any ground vectors.

Requirements for mitigation measures including monitoring actions, responsibility, and other requirements are listed in **Appendix 1-1**.

Significance Criteria

The proposed project site, which is currently mostly graveled and paved, does not support any sensitive, rare or protected plants or animals. The proposed project would incorporate the relevant mitigation measures identified above to ensure that previously identified significant impacts relevant to biological resources would be maintained at less than significant levels. As described below, the proposed project would not create new significant impacts to biological resources.

The impacts on biological resources would be considered significant if any of the following criteria apply:

- The project results in a loss of plant communities or animal habitat considered to be rare, threatened or endangered by federal, state or local agencies;
- The project interferes substantially with the movement of any resident or migratory wildlife species; or
- The project adversely affects aquatic communities through construction or operation of the project.

IV. a), b) and d) The proposed project would not have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish & Wildlife Service, nor would it have a substantial adverse effect on any riparian habitat or other sensitive natural community. Additionally, the proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites as discussed below.

The proposed site for the electricity generating facility and new regeneration flare is in a portion of Sunshine Canyon Landfill that has been disturbed by heavy construction equipment and is near one of the three existing flares. As such, the area has been graded and is subject to regular vehicle traffic and brush removal. The site, which is currently mostly graveled and paved, does not support any sensitive, rare or protected plants or animals. In fact, no animals have been observed on the proposed project site other than rodents and vermin. The proposed project would not involve direct impact on habitat for known sensitive species. The Sunshine Canyon Landfill contains some areas with sensitive coastal sage scrub, riparian habitat, and oak woodland habitat, but this habitat is not located near the proposed project site. The nearest habitat to the project area is likely coastal sage scrub located approximately 500 feet north of the project site, up the canyon walls. As noted above, the project proponent would work with the Sunshine Canyon Landfill's biologist, as necessary, to ensure that the appropriate mitigation measures are maintained throughout implementation of the proposed project. In the event the proposed project is required to remove an oak tree or native tree species, or Venturan coastal sage scrub, Mitigation Measures 4.10 through 4.29 (see **Appendix 1-1**) would be applicable to the proposed project. Therefore, no further analysis of the issue is required.

IV. c) The proposed project would not have a substantial adverse affect on federally protected wetlands as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal) through direct removal, filling, hydrological interruption, or other means. The proposed electricity generating facility would be located on a highly disturbed site located on the northern portion of the Sunshine Canyon Landfill, where there is no evidence that major riparian or other sensitive habitat exists. The Sunshine Canyon Landfill site does, however, contain coastal sage scrub, riparian habitat, and oak woodland, all of which are considered sensitive habitats. These habitats are mostly located along the south and southwestern portions of the site and around the outer portions of the Sunshine Canyon Landfill. The closest sensitive habitat area is located approximately 500 feet to the north of the project site. Activities on the project site are not expected to disturb this habitat and construction activity, such as grading and transporting of construction material, will generally be kept away from these habitats. Additionally, the project proponent would work with the Sunshine Canyon Landfill's biologist, as necessary, to ensure that the appropriate mitigation measures are maintained throughout implementation of the proposed project. In the event the proposed project is required to remove an oak tree or native tree species, or Venturan coastal sage scrub, Mitigation Measures 4.10 through 4.29 (see **Appendix 1-1**) would be applicable to the proposed project. Therefore, no further analysis of the issue is required.

IV. e) and f) The proposed project does not include any components that would conflict with local policies or ordinances protecting biological resources, or conflict with the provisions of any adopted local, regional, or state conservation plans because it will occur on an existing landfill

site that has no such plans, policies, or ordinances in place. Effects on biological resources outside the boundary of the facility are not anticipated. Further, the proposed project will not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, locally adopted conservation or restoration plan or any other relevant Habitat Conservation Plan, as the proposed project will not require any land use changes that would conflict with any local policies protecting biological resources or Habitat Conservation Plans. The property has no such plans overlapping or adjacent to the site.

Based on these considerations, significant adverse biological resource impacts are not anticipated and will not be further analyzed in the Draft SEIR. Because no significant impacts were identified, no additional mitigation measures are necessary or required beyond those imposed as part of previous approvals.

		Potentially Significant Impact	Less Than Significant Impact	No Impact
V.	**CULTURAL RESOURCES.** Would the project:			
a)	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☑
b)	Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	☐	☐	☑
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☑
d)	Disturb any human remains, including those interred outside formal cemeteries?	☐	☐	☑

CULTURAL RESOURCES DISCUSSION

Previous environmental analyses of cultural resources at the Sunshine Canyon Landfill have resulted in the development of mitigation measures to reduce potentially significant environmental impacts of landfill activities to less than significant impacts, as specified in the MMRS. The proposed project would be constructed within a previously disturbed area and most grading activities would be conducted in backfilled material and would not disturb native soils. However, components of the proposed project that disturb native soils would adopt the applicable mitigation measures to ensure compliance with the current landfill CUP requirements. With regard to cultural resources, the following mitigation measures listed in the Archeological, Historical, and Paleontological sections of the MMRS apply to the proposed project:

- Prior to the commencement of initial earth excavation, specific sections of the landfill project area will be resurveyed as a precautionary measure to minimize potential loss of

undiscovered archaeological or paleontological resources. Specific sections of the project area to be resurveyed will be determined by the intended cut and fill areas proposed for landfill development. As new areas for excavation are identified by the permittee, an evaluation of the need for resurveying of those areas will be made based on prior survey results and consultation with the appropriate technical specialists. Factors to be considered for delineation of areas to be resurveyed will be known site selection factors associated with aboriginal groups suspected of having inhabited the general area. These factors include: proximity to water; the type of local vegetation (e.g., food source, shelter, and fuel); and the topography (e.g., slope and aspect).

- An archaeologist and paleontologist will be on-site during major infrastructure work which requires significant excavation. In the event that archaeological and paleontological resources are discovered during grading or excavation, the archaeologist and/or paleontologist shall be allowed to redirect grading away from the area of exposed fossils to allow sufficient time for inspection, evaluation, and recovery.
- Archaeological resources recovered during surface collection, subsurface excavations, and monitoring, with related records, notes, and technical reports, shall be curated at a regional repository approved by the County.

Requirements for mitigation measures including monitoring actions, responsibility, and other requirements are listed in **Appendix 1-1**.

Significance Criteria

The proposed project would incorporate the relevant mitigation measures identified above to ensure that previously identified significant impacts relevant to cultural resources would be reduced to less than significant levels. As described below, the proposed project would not create new significant impacts to cultural resources.

Impacts to cultural resources would be considered significant if:

- The project results in the disturbance of a significant prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group;
- Unique paleontological resources are present that could be disturbed by construction of the proposed project; or
- The project would disturb human remains.

V. a), b) and d) The proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 because the proposed project site occupies highly disturbed land used for solid waste disposal/public utility use. The site and surrounding area has been used for refuse disposal since the 1950s, and prior to that time was the site of active oil exploration and extraction, with many abandoned well heads and drilling platforms still in existence. Previous records searches and on-site surveys have not determined that historical resources exist on the project site. The proposed project would not result in new disturbances of any additional areas not analyzed in the FEIR and SEIR. The previous FEIR and SEIR found no significant impacts to cultural, paleontological or historical resources within the boundaries of the Sunshine Canyon Landfill. Therefore, no further analysis of this issue is required.

As identified in the FEIR and SEIR, an archaeological survey of the landfill conducted in 1975 resulted in the discovery of one archaeological site (recorded as CA-LAN-816), which is not in the vicinity of the proposed project. Records searches and additional on-site surveys since that time have not identified any additional archaeological resources. In addition, no human remains, including those interred outside formal cemeteries, have been identified on the property. Therefore, no further analysis of this issue is required.

V. c) A discussion of paleontological resources was included in Section 3.2.5 of the FEIR and Section 4.19.2 of the SEIR. According to previous assessments, the project site is underlain by marine sedimentary rocks, and, as such, there is a high degree of probability that significant fossil resources could be recovered on the project site. These resources have the potential to be scientifically valuable. The proposed project would not result in new disturbances of any additional areas not analyzed in the FEIR and SEIR, and impacts of the proposed project on paleontological resources would be the same as those identified in the FEIR and SEIR. Previous environmental review work did not reveal any significant impacts to paleontological resources. Therefore, no further analysis of this issue is required.

Based on these considerations, significant adverse cultural resource impacts are not anticipated and will not be further analyzed in the Draft SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

		Potentially Significant Impact	Less Than Significant Impact	No Impact
VI.	**ENERGY.** Would the project:			
a)	Conflict with adopted energy conservation plans?	☐	☐	☑
b)	Result in the need for new or substantially altered power or natural gas utility systems?	☐	☑	☐
c)	Create any significant effects on local or regional energy supplies and on requirements for additional energy?	☐	☐	☑
d)	Create any significant effects on peak and base period demands for electricity and other forms of energy?	☐	☐	☑
e)	Comply with existing energy standards?	☐	☑	☐

ENERGY DISCUSSION

Environmental impacts associated with energy were not identified as a project issue in the 1993 FEIR or the 1998 SEIR.

Significance Criteria

The impacts to energy resources will be considered significant if any of the following criteria are met:

- The proposed project conflicts with adopted energy conservation plans or standards;
- The proposed project results in substantial depletion of existing energy resource supplies;
- An increase in demand for utilities impacts the current capacities of the electric and natural gas utilities; or
- The proposed project uses non-renewable resources in a wasteful and/or inefficient manner.

VI. a), c) and d) The proposed project does not require any action that would conflict with an adopted energy conservation plan or violate any energy conservation standard. In fact, the energy produced from the proposed project would help contribute to the achievement of the State of California's mandated Renewables Portfolio Standard, which requires electrical utilities to achieve a 33% renewable energy target by 2020 (California Governor's Executive Order S-14-08). The proposed project would convert the existing LFG that is currently flared into a useful energy source through the construction of a new electricity generating facility on the Sunshine Canyon Landfill site. Once the power generation facility is complete, in order to start the first turbine the plant would require 1-3MW of capacity and energy from SCE for a period of up to 1-2 hours. After the first turbine becomes operational, and is electrically connected to SCE's transmission system and generating electricity, the facility would generate sufficient energy to provide for the internal use of the plant auxiliary equipment.

The proposed project would consume approximately 15-17% of the total energy generated from the LFG to supply internal auxiliary equipment loads. The electricity generated by the facility would not be connected or supplied to the existing landfill electricity distribution system. Instead, the electricity generated by the facility would be delivered to the SCE transmission system. Additionally, as a new energy source, the proposed project would not create any significant adverse impacts on peak and base period demands for electricity and other forms of energy. Based upon these considerations, significant adverse energy impacts are not anticipated and will not be further analyzed in the SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

VI. b) and e) The proposed facility would generate electricity that would be input into the state-wide electrical grid and used in southern California. The proposed project would include the construction of new internal power poles and installation of new transmission power poles to the project site from the SCE transmission line on the landfill, as well as a new SCE substation (see **Figure 1-5**). The new transmission line would have a 66 kV capacity which would sufficiently transmit the 20 MW electricity generated from the proposed project. The new substation is required to allow for safe connection from the facility to the SCE transmission system. The substation would contain the appropriate circuit breakers, relays, and metering to monitor and control the electricity generated by the project. The substation would be connected to the SCE transmission system as shown on **Figure 1-5**. As shown, the connection would be made through an extension of the existing 66 kV transmission line located on the north side, and construction of new power poles that would have two sets of power lines that allow for the safe operation of the project facility and the SCE transmission line. The two sets of power lines would result in an altered utility system that would be built by SCE and incorporated into their transmission system.

However, the SCE transmission system is large relative to the proposed project transmission line and these changes would not result in a substantially altered transmission system. In addition, the installation of the proposed 66 kV transmission line would comply with existing energy standards. Therefore these impacts are considered less than significant. However, due to the SCE's procedural requirements for the CEQA process, this issue will be discussed in further detail in the Draft SEIR.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:			
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☑
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☑
2. Strong seismic ground shaking?	☐	☐	☑
3. Seismic–related ground failure, including liquefaction?	☐	☐	☑
4. Landslides?	☐	☐	☑
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☑
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☑
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☑
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☑

GEOLOGY AND SOILS DISCUSSION

Previous environmental analyses of geologic conditions within the Sunshine Canyon have identified potentially significant impacts associated with grading activities and construction of

engineered structures. The proposed project would adopt the following mitigation measures from the current MMRS (**Appendix 1-1**) to ensure compliance with the current landfill CUP requirements and to reduce potentially significant impacts to less than significant levels:

- Final designs for major engineered structures will be based on the results of the detailed stability analyses of potential seismic events. Final cut slopes shall be no steeper than 1.5:1 (horizontal to vertical ratio excluding benches).
- All grading activities shall be performed in accordance with applicable provisions of the County Code and with the rules and regulations as established by the County Department of Public Works.
- All grading activities shall be in compliance with specific requirements provided in a comprehensive geotechnical report prepared specifically for the proposed Project, including provisions for excavation approved by the County Department of Public Works, the County Local Enforcement Agency (LEA) and other Responsible Agencies.
- Areas outside of and above the cut and fill will not be graded or similarly disturbed to create landfill areas. The Director of Public Works may approve additional grading, based upon engineering studies provided by the permittee and independently evaluated by the Director. Additional grading would be necessary for slope stability or related drainage purposes.
- Grading allows for ancillary facilities outside of the landfill footprint.
- Revegetation and erosion control of all exposed slopes will be an ongoing process. The erosion controls to be implemented at the site will include soil stabilization measures and revegetation in accordance with the approved Revegetation Program. The installation of interceptor ditches shall be designed for the diversion of stormwater runoff to sedimentation basins. Sediment traps will be used at points of runoff concentration along the perimeter of exposed slopes surfaces.

Requirements for mitigation measures including monitoring actions, responsibility, and other requirements are listed in **Appendix 1-1**.

Significance Criteria

The proposed project would incorporate the relevant mitigation measures identified above to ensure that previously identified significant impacts relevant to geologic and soil conditions within the proposed project location would be reduced to less than significant levels. As described below, the proposed project would not result in new significant impacts due to geologic or soil conditions within the proposed project area.

The impacts on the geological environment would be considered significant if any of the following criteria apply:

- Topographic alterations would result in significant changes, disruptions, displacement, excavation, compaction or over covering of large amounts of soil;
- Unique geological resources (paleontological resources or unique outcrops) are present that could be disturbed by the construction of the proposed project;
- Exposure of people or structures to major geologic hazards such as earthquake surface rupture, ground shaking, liquefaction or landslides;

- Secondary seismic effects could occur that could damage facility structures (e.g., liquefaction); or
- Other geological hazards exist which could adversely affect the facility (e.g., landslides, mudslides).

VII. a) Seismic-related discussions were previously provided in Section 3.2.1 of the FEIR for the Sunshine Canyon Landfill Extension (certified by the County of Los Angeles Board of Supervisors in 1991) and Section 4.1 of the SEIR for Sunshine Canyon Landfill (certified by the City of Los Angeles City Council in 1999). As identified in these documents, the closest active faults to the landfill are the San Fernando-Sierra Madre Fault, which is located 3.3 miles from the site, and the Northridge Blind-Thrust Fault, which is located 6.2 miles from the site.

The risk of seismic hazards, such as fault rupture or strong ground shaking, cannot be avoided; however, implementation of standard engineering design measures (e.g., Uniform Building Code) would minimize potential seismic hazard impacts. The general intent of building and construction design codes is to minimize structural damage resulting from a seismic event. In addition, the FEIR and SEIR provided mitigation measures to address impacts associated with seismic hazards. Because the proposed project would be located within the boundaries of Sunshine Canyon Landfill, the permittee of the proposed project would be required to implement applicable mitigation measures from the FEIR and SEIR. Accordingly, project impacts would be the same as those previously identified in the FEIR and SEIR, and implementation of the proposed project would present no additional risk associated with seismic activity. Therefore, no further analysis of this issue is required.

According to the Seismic Hazard Zones Map for the Oat Mountain Quadrangle prepared by the California Department of Conservation, the project site is not located within a liquefaction zone. Therefore, no further analysis of this issue is required.

According to the Seismic Hazard Zones Map for the Oat Mountain Quadrangle prepared by the California Department of Conservation, the project site is located in a landslide area. Exploratory investigations within Sunshine Canyon Landfill indicate that landslide deposits are relatively scarce within the landfill site, although an area immediately north of the proposed project may need to be stabilized as part of the proposed project. Following the appropriate design level geologic and engineering design, the proposed project would incorporate the necessary recommendations to maintain the appropriate factor of safety.

Any construction within a landslide area is required to include excavation of the affected soils and ensure that there are no resulting impacts to slope stability. In addition, the FEIR and SEIR provided mitigation measures to address impacts associated with seismically induced landslides. Because the proposed project would be located within the boundaries of Sunshine Canyon Landfill, the permittee of the proposed project would be required to implement applicable mitigation measures from the FEIR and SEIR. Accordingly, project impacts would be the same as those previously identified in the FEIR and SEIR, and implementation of the proposed project would present no additional risk associated with landslide activity. Additionally, the proposed project would comply with the SCAQMD Rule 403, which, in addition to reducing potential air quality impacts due to fugitive dust emission, also helps minimize soil erosion. Therefore, no further analysis of this issue is required.

VII. b) Detailed discussions of the types of soils in the project area are provided in Section 3.2.1 of the FEIR and Section 4.1 of the SEIR. The soils consist of silty sand with minor clay and gravel components, and the fine fraction is of low to medium plasticity. Mitigation measures presented in the SEIR require that the base of the landfill be excavated down to a bedrock foundation to reduce the potential risks from expansive soils. Because the proposed project would be located within the boundaries of Sunshine Canyon Landfill, the proposed project would be required to implement applicable mitigation measures from the FEIR and SEIR. Additionally, all structures would be required to conform to the 2007 (or current version pending future updates) California Building Code and L.A. County slope stabilization and erosion control requirements. Accordingly, the proposed project would not alter ongoing grading and excavating activities, and the impacts would be the same as those identified in the FEIR and SEIR. Additionally, the proposed project would comply with the SCAQMD Rule 403, which, in addition to reducing potential air quality impacts due to fugitive dust emission, also helps minimize soil erosion. Therefore, no further analysis of this issue is required.

VII. c) and d) Slope conditions were previously described in Section 3.2.1 of the FEIR and Section 4.1 of the SEIR for Sunshine Canyon Landfill. As identified in these documents, the existing natural slopes on the project site are considered relatively stable. Engineered slopes are designed to be stable, as required by the mitigation measures provided in the FEIR and SEIR to address impacts associated with slope stability. Because the proposed project would be located within the boundaries of Sunshine Canyon Landfill, the proposed project would be required to implement applicable mitigation measures from the FEIR and SEIR, namely to provide properly engineered slopes for all graded areas. Accordingly, project impacts would be the same as those previously identified in the FEIR and SEIR, and implementation of the proposed project would present no additional risk associated with slope stability. Therefore, no further analysis of this issue is required.

According to the Seismic Hazard Zones Map for the Oat Mountain Quadrangle prepared by the California Department of Conservation, the project site is not located within a liquefaction zone. Therefore, no further analysis of this issue is required.

VII. e) The proposed project would add two to three additional employees that would generate less than 60 gallons per day (gpd) of incidental wastewater effluent through the use of common areas such as the employee washroom. The generation of 60 gpd of wastewater effluent is considered an insignificant amount. It is anticipated that all wastewater generated at the facility would be collected in a holding tank which would be pumped out and removed from the site as needed. As such, the proposed project would not include the installation of a septic tank. Therefore, no further analysis of the issue is required.

		Potentially Significant Impact	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, disposal of hazardous materials?	☐	☐	☑
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☑
c)	Emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☑
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☑
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☑
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☑
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☑
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☑

		Potentially Significant Impact	Less Than Significant Impact	No Impact
i)	Significantly increased fire hazard in areas with flammable materials?	☐	☐	☑

HAZARDS AND HAZARDOUS MATERIALS DISCUSSION

Previous environmental analyses of landfill projects have resulted in the development of mitigation measures that reduce potentially significant impacts due to hazards and hazardous materials on the landfill to less than significant impacts. The proposed project would adopt the applicable mitigation measures to reduce potentially significant impacts and ensure compliance with the current landfill CUP requirements. Specific to hazards and hazardous materials, the following mitigation measure applies directly to the proposed project:

- All on-site fuel storage tanks shall be installed and necessary containment and air quality controls provided in accordance with the requirements of the County Forester and Fire Warden, the County Department of Public Works, the RWCQB, the SCAQMD, and other applicable regulations. Labeling and reporting of motor fuel storage will comply with provisions of Proposition 65, the Safe Drinking Water and Toxic Enforcement Act of 1986.
- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. Any person owning or having control of any facility, structure, or group of structures on the premises shall provide and maintain Fire Department access. Fire breaks, roads, and fire trails shall be maintained by the permittee in accordance with County Fire Department requirements.
- On-site structures shall be continuously monitored for the presence of unsafe levels of methane gas.
- If necessary, the permittee shall install electrical (e.g., battery backup) combustible gas detectors in habitable structures. Employees shall be trained in all applicable safety requirements to prevent any upset conditions from occurring.
- A detailed fire response plan that incorporates the County Fire Department requirements shall be prepared, and signs shall be posted on site prohibiting open burning within the project area. The following procedures shall be maintained;
    - Fire extinguishers shall be maintained in all heavy equipment, on-site work vehicles, and all structures as required by County Fire Department.
    - Vehicle and mechanical inspections shall be performed on a regular basis, and focus on the electrical system, hydraulic, and fuel lines.
- The permittee shall implement a fire prevention plan in compliance with CCR, Title 8, ' 3221. Components of this written fire prevention plan shall include potential fire hazards and their proper handling and storage procedures; potential ignition sources (i.e., welding or smoking), their control procedures, and the type of fire protection equipment or systems that can control a fire involving them; names or regular job titles of those

responsible for maintenance of equipment and systems installed to prevent or control ignitions or fires; and names or regular job titles of those responsible for the control of accumulation of flammable or combustible waste materials.

- All gas extraction equipment, including gas condensate and propane tanks, shall be adequately secured to prevent damage during a seismic event. Inspections of the gas collection and flaring system shall be performed after ground-shaking from an earthquake, and necessary action shall be taken to correct any potential problems
- Equipment operators involved in excavation shall be made cognizant of the potential presence of existing unrecorded subsurface wellheads. If a wellhead (or other unidentifiable obstruction) is encountered during construction, all excavation activities shall cease. The area will be cordoned off, and the landfill supervisor shall be called to determine whether the obstruction is an abandoned wellhead.
- A portable explosive gas detection device shall be used to determine whether the obstruction is a wellhead that may be leaking natural gas. If this is the case, all personnel shall be evacuated within a 500-foot radius and a representative from the California Department of Conservation, Division of Oil, Gas and Geothermal Resources shall be notified. Excavation activities shall cease until further instruction from the Department is received. If gas is not detected, a backhoe or similar type equipment shall be brought in to further expose the obstruction. If necessary, well abandonment procedures shall be utilized following Department protocol.
- A spill response program shall be part of required training for all facility employees. In the event of a spill, containment is paramount. All landfill employees shall be trained to use dirt and/or other absorbent materials to pick up and/or contain small spills of oils, solvents, and/or other materials that may be harmful to the public, facility workers, or the environment. Training in the use of personal protective equipment, fire extinguishing aids (e.g., hoses or extinguishers), and spill containment/mitigation (e.g., absorbents) shall be provided.

Significance Criteria

The proposed project would incorporate the above mentioned mitigation measures to ensure that previously identified significant impacts relevant to hazards and hazardous materials and the proposed project would be reduced to less than significant levels. As described below, the proposed project would not create new significant impacts due to hazards or hazardous materials,

The impacts associated with hazards will be considered significant if any of the following occur:

- Non-compliance with any applicable design code or regulation;
- Non-conformance to National Fire Protection Association standards;
- Non-conformance to regulations or generally accepted industry practices related to operating policy and procedures concerning the design, construction, security, leak detection, spill containment or fire protection; or
- Exposure to hazardous chemicals in concentrations equal to or greater than the Emergency Response Planning Guideline (ERPG-2) levels.

VIII. a) and b) The Sunshine Canyon Landfill is an existing Class III non-hazardous landfill facility and is not a generator of, or repository for, hazardous wastes. No hazardous, acutely

hazardous, radioactive, infections medical or liquid wastes are accepted at this facility. Mitigation measures identified in the FEIR and SEIR require that the landfill operator implement hazardous waste load-checking programs. The proposed project would not, in any way, affect the amount or character of wastes disposed of at the landfill.

The proposed project would include various oil storage and wastewater containment units associated with operation and maintenance of the power generation facility. Specifically, the proposed project would maintain between 2,000 and 3,000 gallons of oil products for operation and maintenance of the turbines, compressors, and transformers. All equipment related oil storage units would meet current standards for above ground storage tanks and would be managed under a site-specific Spill Prevention, Control, and Countermeasure (SPCC) Plan compliant with the U.S. EPA SPCC Rule, as well as a Hazardous Materials Business Plan (HMBP) compliant with the State of California, Office of Emergency Services. Additionally, oily wastewater would potentially be generated due to processing of LFG through the compressor system; however the proposed project is not expected to generate any wastewater that would be classified as hazardous waste. If any hazardous waste is generated, it would be properly disposed of in landfill or other method that is authorized to accept such waste. Therefore, no further analysis of the issue is required.

VIII. c) The proposed project site is not within one-quarter mile of a residential unit, school, or hospital. The closest school to the project site is Van Gogh Elementary School, located more than 2 miles south of the proposed project site. Accordingly, the proposed project would not emit, handle, or transport hazardous materials within 0.25 mile of an existing school. Because of the distance between the project site and all sensitive receptors (over 1.7 miles), the project poses no hazards to such receptors. Additionally, implementation of the proposed project would not result in emission of hazardous materials or involve handling acutely hazardous materials. Therefore, no further analysis of the issue is required.

VIII. d) Previous review of the Department of Toxic Substances Control's Hazardous Waste and Substances Site List (Cortese List) for the Sunshine Canyon Landfill indicates that the project site is not included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. Furthermore, the FEIR and SEIR include mitigation to reduce potential impacts related to hazardous materials at the project site. The project is not expected to generate any hazardous wastes and does not pose a threat of contamination to soil or groundwater. Therefore, no further analysis of the issue is required.

VIII. e) and f) The proposed renewable energy facility will be less than 30 feet tall and would not interfere with flight paths of any airport or pose a safety hazard for any airport in the area. The proposed project would present no impacts related to any airport land use plan. Additionally, the proposed project is not located within a two mile radius of a public airport. Therefore, no further analysis of the issue is required.

VIII. g) Construction activities would occur within the boundaries of the existing landfill site and would not interrupt emergency vehicle access on major roadways surrounding Sunshine Canyon Landfill or interfere with an adopted emergency response/evacuation plan. Therefore, no further analysis of the issue is required.

VIII. h) and i) The FEIR and SEIR both include mitigation measures to ensure that no impacts to existing and planned emergency access would occur and to mitigate potential fire hazards associated with landfill activities. The proposed project would have impacts related to fire hazard

that are substantially the same as those described in the FEIR and SEIR for Sunshine Canyon Landfill. The electrical generation facility will have its own carbon dioxide (CO_2) fire suppression system for each turbine designed specifically to address the fire hazards associated with electrical equipment. Prior to project construction, the project proponent would consult the local fire marshal and ensure that the proposed project meets all applicable fire codes. Based on the foregoing analysis and information, no further analysis of issues related to fire hazards or fire/sheriff services is required.

Based on these considerations, significant adverse hazards and hazardous materials impacts are not anticipated and will not be further analyzed in the Draft SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

		Potentially Significant Impact	**Less Than Significant Impact**	**No Impact**
IX.	**HYDROLOGY AND WATER QUALITY.** Would the project:			
a)	Violate any water quality standards or waste discharge requirements?	☐	☐	☑
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☑
c)	Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	☑
d)	Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☑

		Potentially Significant Impact	Less Than Significant Impact	No Impact
e)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☑
f)	Otherwise substantially degrade water quality?	☐	☐	☑
g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☑
h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☑
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☑
j)	Inundation by seiche, tsunami, or mudflow?	☐	☐	☑
k)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☑	☐
l)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☑	☐
m)	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☑	☐
n)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☑

	Potentially Significant Impact	Less Than Significant Impact	No Impact
o) Require in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☑

HYDROLOGY AND WATER QUALITY DISCUSSION

Previous environmental analyses of landfill projects have resulted in the development of mitigation measures that reduce potentially significant environmental impacts of landfill activities to less than significant impacts. The proposed project would adopt the applicable mitigation measures to reduce potentially significant impacts and ensure compliance with the current landfill CUP requirements. Specific to hydrology and water quality, the following mitigation measure applies directly to the proposed project:

- On-site drainage control channels will be designed per CCR, Title 23, Division 3 Chapter 15, Article 3, § 2546, which mandates the requirements for a capital storm event (100-year, 24-hour precipitation).
- An erosion control plan will be implemented by the permittee to prevent stormwater pollution from construction activity. Construction materials, equipments and vehicles will be stored or parked in areas protected from stormwater runoff. Construction material loading and unloading would be in designated areas to minimize any washout due to stormwater runoff. Pre-construction controls will be implemented to include the use of a sandbagging system, including sandbag check dams and sandbag desilting basins, which would be used to limit runoff velocities and minimize sediment in stormwater runoff.
- In order to monitor the effectiveness of those measures designed to prevent pollution from entering the off-site stormwater system, the permittee shall be required to apply for coverage under the SWRCB's General Construction Activities Stormwater Permit Programs
- Dust control water will be applied to wet only the upper soil surface. Evaporation is the natural means whereby this water is dissipated.

Significance Criteria

The proposed project would incorporate the above mentioned mitigation measures to ensure that previously identified significant impacts relevant to hydrology and water quality and the proposed project would be reduced to less than significant levels. As described below, the proposed project would increase the storage of oil products on-site; however these activities would not create new significant impacts to hydrology or water quality.

Potential impacts on water resources will be considered significant if any of the following criteria apply:

Water Quality

- The project will cause degradation or depletion of groundwater resources substantially affecting current or future uses;
- The project will cause the degradation of surface water substantially affecting current or future uses;
- The project will result in a violation of National Pollutant Discharge Elimination System (NPDES) permit requirements;
- The capacities of existing or proposed wastewater treatment facilities and the sanitary sewer system are not sufficient to meet the needs of the project;
- The project results in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs; or
- The project results in alterations to the course or flow of floodwaters.

Water Demand

- The existing water supply does not have the capacity to meet the increased demands of the project, the project would use a substantial amount of potable water; or
- The project increases demand for water by more than five million gallons per day.

IX. a) and f) Water quality discussions were previously provided in Sections 3.2.2 and 3.2.3 of the FEIR and Section 4.3 of the SEIR for the Sunshine Canyon Landfill. Due to the nature of operations at the landfill, construction-type activities are ongoing as the landfill accepts waste Monday through Saturday. Elevated concentrations of groundwater contaminants have sporadically been detected on site. To address this issue, the landfill operators are currently implementing mitigation measures that incorporate a number of environmental protection and control systems, including a groundwater extraction trench/cut-off wall, an LFG collection and flaring system, a leachate collection and removal system (LCRS), a landfill liner system, and ongoing water quality monitoring to ensure that adequate groundwater protection and control systems are in place. With incorporation of these measures and requirements, any landfill-related impacts to groundwater are detected and remedied. Construction of the proposed project would not involve activities that are substantially different from those that are currently conducted at the landfill.

The proposed project would involve construction of the LFG treatment system, a siloxane removal system that would be regenerated on site, and an enclosed ground flare to control the regenerated waste gas. Construction activities would be subject to the requirements of the landfill's Waste Discharge Requirements (WDRs) and applicable NPDES permit which requires the use of Best Management Practices (BMPs) that prevent water quality impacts due to construction activities. During operation of the proposed project, between 2,000 and 3,000 gallons of oil products would be contained on-site as certain pieces of equipment require fueling and maintenance, such as the turbines, compressors, and transformers. As described in section VIII, all equipment related oil storage units would meet current standards for above ground storage tanks and would be managed under a site-specific Spill Prevention, Control, and Countermeasure (SPCC) Plan compliant with the U.S. EPA SPCC Rule, as well as an HMBP compliant with the State of California, Office of Emergency Services. Proper storage and maintenance of oil products would prevent additional impacts to water quality that were not analyzed in previous environmental documents. Therefore, no further analysis of the issue is required.

IX. b) The proposed project does not propose the use of individual water wells. The proposed project site location is currently mostly graveled and paved, and most likely limits the ability for groundwater recharge to occur. Additionally, the proposed project would not substantially increase the amount of impervious surfaces within the landfill. With respect to groundwater resources, the proposed project would not alter landfill operations beyond what was analyzed in the FEIR and SEIR or otherwise generate additional impacts to groundwater that were not analyzed in previous environmental documents. Therefore, no further analysis of the issue is required.

IX. c), d), e) and m)

The proposed project would not require the alteration of a stream or river, and would not alter the dominant drainage pattern of the site location. As described above, the project site location is currently mostly graveled and paved indicating the proposed project would not substantially increase the amount of impervious surfaces on-site. The mitigation measures in the FEIR and SEIR and landfill permit requirements ensure that adequate stormwater runoff protection and control systems are in place. The activities associated with the proposed project would not alter the drainage pattern or otherwise generate additional impacts to stormwater runoff that were not analyzed in previous environmental documents. The mitigation measures in the FEIR and SEIR and landfill permit requirements ensure that adequate stormwater runoff protection and control systems are in place. Therefore, no further analysis of this issue is required.

IX. g), h) and i) The proposed project does not include construction of houses and would not place housing within a 100-year flood hazard. Additionally, the National Flood Insurance Program sponsored by the Federal Emergency Management Agency (FEMA) categorized the majority of Sunshine Canyon Landfill in Zone C on the Flood Insurance Rate Map (FIRM), which is the classification for areas of minimal flooding. A small area located near the bottom of the canyon, where the creek flows off site, is categorized as Zone A. Zone A is the classification for a 100-year floodplain. The FEIR and SEIR include mitigation measures that require construction of sedimentation basins that are designed to handle a 100-year storm event in accordance with California Code of Regulations (CCR), Title 23, Division 3, Chapter 15, Article 3, Section 25333 (c) (Flooding). Because the proposed project would be located within the boundaries of Sunshine Canyon Landfill, the proposed project would be required to implement applicable mitigation measures from the FEIR and SEIR, described above. The proposed project would not expose people or property to additional flood hazards beyond those analyzed and mitigated for in the FEIR and SEIR. Therefore, no further analysis of this issue is required.

IX. j) The potential for mudslides at Sunshine Canyon Landfill is minimal due to the limited thickness of soil veneer on slopes and the on-site control measures listed in the FEIR and SEIR that limit erosion, manage surface water, and ensure that mudflow conditions on site are avoided. Neither is the site subject to seiche or tsunami due to the distance between the site and nearby lakes and coastline (over 8 miles). The proposed project would not generate new risks from mudflows beyond those analyzed and mitigated for in the FEIR and SEIR. Therefore, no further analysis of this issue is required.

IX. k) The proposed electrical generation facility would process LFG through a treatment process that filters, dewaters, and compresses the gas prior to combustion. The gas treatment process would include a siloxane removal system (siloxane is a compound made of alternating silicon and oxygen atoms with hydrocarbon chains attached to the silicon atoms) that would

provide additional filtration for the LFG prior to combustion in the electricity generating turbines. Additionally, the project design may include an inlet air cooling and thermal energy storage system which uses water to store heat and to reduce the inlet air temperature to the turbine to improve system capacity when ambient conditions reduce the turbine capacity. This water would be stored on-site and continuously used in a closed-loop system so no wastewater discharges would be generated from this system.

Assuming that the LFG is saturated and the treatment process removes 100% of the water vapor, it is expected that approximately 8,500 gallons of wastewater would be generated each day during the gas treatment process. The majority of the wastewater would be generated from the compressor system and a portion may also be generated in the siloxane removal system. Preliminary estimates of water quality indicate that the wastewater may contain a component of oily waste. An additional 500 to 1000 gallons of wash water would be generated on a quarterly basis as part of equipment cleaning and maintenance. This wash water would be captured and included in the wastewater management described below.

Specifically, the proposed project would be designed to separate relatively clean water that could be returned to Sunshine Canyon Landfill and managed under the current condensate and leachate handling program. The relatively clean wastewater would either be piped directly to the Sunshine Canyon Landfills storage and treatment system, or alternatively stored near the power generation facility using an above ground storage tank with up to 5,000 gallon capacity and than piped directly to the Sunshine Landfill's treatment system. The remaining portion that would contain the oily wastewater would either be disposed of at a proper waste disposal facility, or if appropriate, the wastewater would possibly be treated on-site and returned to the Sunshine Canyon Landfill for disposal.

The Sunshine Canyon Landfill manages wastewater associated with the landfill operation under an Industrial Wastewater Permit issued by the City of Los Angeles (Permit Number W-464583, amended June 1, 2007; the "Industrial Wastewater Permit"). The permit was issued because the total process wastewater discharged from the facility is greater than 25,000 gallons per day, which is a Federal threshold value for a Significant Industrial User under the Code of Federal Regulations (CFR 403.12). The sources of wastewater collected at the landfill and discharged to the sewer are landfill leachate, gas condensate, spring (seep) water, and wash water. The landfill operates three water treatment facilities to ensure that the water quality meets the discharge limitations specified in the Industrial Wastewater Permit. Additionally, the landfill conducts monitoring and reporting in accordance with the Industrial Wastewater Permit.

The wastewater that would be generated as part of the proposed project would likely be similar in composition to the gas condensate that is already collected as part of the Industrial Wastewater Permit. However, additional information is required to fully describe the procedures necessary to properly handle the anticipated 8,500 gallons of wastewater per day, and to verify that those procedures comply with the Sunshine Canyon Landfill Industrial Wastewater Permit and any applicable RWQCB requirements. Although detailed information is not available at this time, it is reasonable to assume that the wastewater could be appropriately managed and possibly treated on-site in accordance with relevant waste discharge requirements. Therefore, this impact is considered less than significant but would be discussed in the Draft SEIR to provide the appropriate level of detail to document wastewater handling procedures and compliance with applicable requirements.

IX. l) and o) The proposed electricity generation facility would not result in operations that would generate substantial amounts of wastewater. The proposed project would add two to three additional employees that would generate less than 60 gpd of wastewater effluent, which is considered an insignificant amount. The proposed project would not be connected to the sanitary sewer system. It is anticipated that all wastewater generated at the facility would be collected in a holding tank which would be pumped out and removed from the site as needed. As such, the proposed project would not create capacity problems to a community sewage system or require the construction of new municipal water or wastewater treatment facilities. Therefore, no further analysis of the issue is required.

However, as described above, the proposed project would result in the generation of up to 8,500 gallons of wastewater per day. The wastewater would either be piped directly to the Sunshine Canyon Landfills storage and treatment system, or alternatively stored near the power generation facility using an above ground storage tank with up to 5,000 gallon capacity, and then piped directly to the Sunshine Landfill's treatment system. As described in the Industrial Wastewater Permit, the current on-site wastewater treatment system is designed to collect four primary wastewater sources associated with operation of the landfill:

- The landfill leachate is collected in the leachate collection system, wastewater generated is approximately 17,854 gpd;
- The gas condensate is produced due to the temperature drop that takes place as the LFG is conveyed from the landfill to the flare stations (which generates wastewater that is most similar in composition to the wastewater that would be generated as part of the proposed project), wastewater generated is approximately 5,315 gpd;
- Spring (seep) water is from natural springs next to and under the old refuse footprint in the City Landfill side, the wastewater generated is estimated to be 36,283 gpd;
- And the wash water from the equipment wash pad is generated from the rinsing of heavy equipment from landfill operations, the wastewater generated is approximately 2,500 gpd.

In total, the landfill's storage and treatment system accommodate an average of 60,000 gpd, of which approximately 5,315 gpd are generated from the gas condensate.

Through implementation of the proposed project, the majority of the 5,315 gpd of gas condensate would be collected in the proposed compressor system. Due to the LFG processing efficiency, the compressors would increase the amount of gas condensate by approximately 3,000 to 4,000 gpd. The additional 3,000 to 4,000 gpd generated as part of the proposed project would require an approximately 5% of additional processing capacity for the landfill treatment systems. However, due to the fact that the current facility is equipped with large holding tanks, and the proposed project would be capable of installing up to 5,000 gallons of additional storage capacity, the tanks would essentially modulate fluctuations in wastewater generated and the additional 3,000 to 4,000 gallons of wastewater generated as part of the proposed project would not require expansion of the on-site water treatment system. Therefore, no further analysis of this issue is required.

IX. n) The project will include a CO_2 fire suppression system for the turbines. A CO_2 fire suppression system, as opposed to a water system, is the recommended system for the proposed renewable energy facility. However, the proposed project does have the potential to increase

water demand by at least 60 gpd and additionally, by 500 to 1000 gallons on a quarterly basis associated with equipment cleaning and maintenance.

The Sunshine Canyon Landfill has an existing backup water system for firefighting that is considered adequate for fighting fires within the landfill boundaries. The project proponents will consult with local fire officials who have jurisdiction over the project area to ensure that the existing water system will be adequate for the proposed renewable energy facility. SGP does not anticipate bringing water service to the site. Water needs would be addressed through the use of a service water tank and bottled water for drinking. All effluent would be stored in a holding tank and removed on an as-needed basis. Based on these considerations, significant adverse hydrology and water quality impacts are not anticipated and will not be further analyzed in the Draft SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

		Potentially Significant Impact	Less Than Significant Impact	No Impact
X.	**LAND USE AND PLANNING.** Would the project:			
a)	Physically divide an established community?	☐	☐	☑
b)	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☑
c)	Conflict with any applicable habitat conservation or natural community conservation plan?	☐	☐	☑

LAND USE PLANNING DISCUSSION

Previous environmental impact analyses of land use planning identified potentially significant impacts associated with open space and the buffer area in the southern portion of the site. The proposed project would not interfere with the defined buffer area that is part of the MMRS. The land use planning impact identified for the City/County landfill project and associated mitigation measure are not directly applicable to the proposed project..

Significance Criteria

The proposed project would not make significant impacts to land use identified from previous analyses substantially worse or create a new significant impact. Land use and planning impacts would be considered significant if the project conflicts with the land use and zoning designations established by the local jurisdiction.

X. a) – c) The proposed project would be located within the boundaries of Sunshine Canyon Landfill. Accordingly, the proposed project would not physically divide an established

community, including those located south of the landfill in the Community of Sylmar, and, as such, no impacts are anticipated. Therefore, no further analysis of the issue is required.

Sunshine Canyon Landfill has been used for solid waste disposal since 1958. The proposed electricity generation facility would not change the current use of the landfill. The CUP for the County Landfill that was amended in 1999 contemplates that an electrical generation facility would be built to utilize the landfill gas that is currently being flared. As documented in a letter to SCAQMD from the Los Angeles County, Department of Regional Planning, no changes to the existing CUP would be required in order to operate on the County portion of the landfill. A copy of the letter is provided as **Appendix 2-1**. The proposed project would have the same land use impacts as those described in the FEIR and SEIR. Therefore, no further analysis of the issue is required.

The proposed project site is not located in an area currently designated as Sensitive Environmental Area (SEA). However, the County's General Plan designated the County portion of the site as "Hillside Management, Non-Urban Hillside." Because the proposed project would be located within the boundaries of Sunshine Canyon Landfill, the project operators would be required to implement applicable mitigation measures from the FEIR and SEIR to mitigate potential hillside area hazards. Accordingly, the proposed project would have the same impacts as those described in the FEIR and SEIR. Therefore, no further analysis of the issue is required.

Based on these considerations, significant adverse land use and planning impacts are not anticipated and will not be further analyzed in the Draft SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

		Potentially Significant Impact	Less Than Significant Impact	No Impact
XI.	**MINERAL RESOURCES.** Would the project:			
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☑
b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☑

MINERAL RESOURCES DISCUSSION

The Sunshine Canyon Landfill area was historically used as an area for oil drilling operations. Significant impacts to natural resources within the City/County landfill projects were not identified during previous environmental analyses.

Significance Criteria

As described below, there are no impacts to mineral resources associated with the proposed project.

Project-related impacts on mineral resources will be considered significant if any of the following conditions are met:

- The project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or
- The proposed project results in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

XI. a) and b) Aside from the LFG, which is considered a renewable resource being produced on site by the natural decomposition of solid waste, the existing site does not contain known mineral resources that would be of future value. Currently, LFG is being flared and not harvested for use as an energy resource. Previous discussions on mineral resources included in Section 3.2.7 of the FEIR and Section 4.2.13 of the SEIR addressed converting LFG produced on site to beneficial uses as possible mitigation for any impacts to mineral resources. The proposed project would convert LFG into an energy resource that would potentially produce approximately 20 MW of electricity.

The proposed project would not result in a new disturbance of any additional areas not analyzed in the FEIR or SEIR. As such, the proposed project would not result in the loss of availability of a known mineral resource, and impacts would be the same as or less than those identified in the FEIR and SEIR. Therefore, no further analysis of this issue is required.

The project site does not contain a mineral resource site delineated on a land use plan. The proposed project would not result in a new disturbance of any additional areas not analyzed in the FEIR or SEIR, or otherwise impact the availability of a mineral resource. Therefore, no further analysis of this issue is required.

Based on these considerations, significant adverse mineral resources impacts are not anticipated and will not be further analyzed in the SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

		Potentially Significant Impact	Less Than Significant Impact	No Impact
XII.	**NOISE.** Would the project result in:			
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☑	☐
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☑	☐
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☑	☐	☐

		Potentially Significant Impact	Less Than Significant Impact	No Impact
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☑	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☑
f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☑

NOISE DISCUSSION

Previous environmental analyses of the City/County landfill project have resulted in the development of a detailed MMRS that is designed to reduce potentially significant noise impacts of various landfill activities to less than significant levels. The proposed project would implement applicable mitigation measures to ensure compliance with the current landfill CUP requirements. With regard to noise impacts, the following mitigation measures apply directly to the proposed project:

- Small commercial and private users who will use the landfill will be encouraged by the permittee to use alternate routes other than Balboa Boulevard, because this roadway is in close proximity to residential areas.
- All landfill equipment will be equipped with low-noise mufflers and air flow silencers on intake systems (if available) and will be properly maintained.

Significance Criteria

The proposed project would incorporate the relevant mitigation measures identified above to ensure that previously identified significant impacts relevant to noise would be reduced to less than significant levels. However, the proposed project does have the potential to increase the noise levels during normal landfill operating hours due to equipment operation associated with the proposed project. Additionally, as described below, the proposed project has the potential to create new significant impacts to sensitive noise receptors within the project area due the possible presence of new residential neighborhoods that were not present during previous EIR analyses, which would create new sensitive receptors within the project vicinity; and/or due to the fact that the facility will be operational twenty-four hours a day, seven days a week.

The proposed project is located within the jurisdiction of the County of Los Angeles. Therefore, all noise regulations applicable to this project are contained within the County of Los Angeles noise ordinance and noise element. Noise impacts to the on-site workers will be governed by federal Occupational Safety and Health Administration (OSHA) noise exposure regulations. Project related noise impacts will be considered significant if any of the following conditions are met:

- Construction noise levels exceed the County of Los Angeles noise ordinance threshold limits for daytime and nighttime operations or, if the project noise sources are shown to increase the current ambient noise levels by more than three decibels at the proposed project site boundary.
- Facility operations and/or construction noise levels will be considered significant to on-site workers if they exceed federal OSHA noise threshold exposure limits; or
- Facility operation noise levels exceed the County of Los Angeles noise ordinance threshold limits for daytime and nighttime operations or, if the project noise sources increase the current ambient noise levels by more than three decibels at the proposed project site boundary.

a) The project site is located within a small canyon area that is part of the larger Sunshine Canyon. The proposed project would include five (5) gas powered turbines, eight (8) compressor units, two (2) chiller units, and a single enclosed flare unit, which would generally operate continuously for 24 hours 7 days a week. Additional project related equipment may also contain outdoor and/or rooftop heating, ventilating, and air conditioning (HVAC) units for cooling purposes. The proposed equipment would require periodical maintenance work that would be conducted by off-site service vehicles and necessary ancillary equipment traveling to and from the project site. **Table 2-4** summarizes the proposed equipment and associated noise emission levels.

Table 2-5. Summary of Equipment Noise Levels

Quantity	Equipment Description	Manufacturer	Occurrences per Hour	Related Sound Level Distance (ft)	Noise Level (dBA)
5	Turbine	N/A	100%	3	85.0
8	Compressor Unit	N/A	100%	3	95.0 (e)
2	Chiller Unit	N/A	100%	3	90.0 (e)
1	Enclosed Flare Unit	N/A	100%	3	90.0 (e)

(e) = estimated value; additional details will be provided in the Draft SEIR.

The total combined noise level emitting from the proposed equipment is estimated to be 105 dBA.

As documented in the 1998 SEIR, the nearest residential receptor is located approximately one mile southwest of the proposed project site. Given the equipment assumptions and operation schedules, preliminary calculations estimate that the noise impacts to the residential receptor would be approximately 41 dBA. These estimated noise impacts are considered less than significant during the daytime period; however, there may be closer residential receptors that

were not addressed in the 1998 SEIR, which would possibly be subject to higher noise levels that would exceed the nighttime noise limit of 45 dBA. The possibility of new receptors will be defined and evaluated within the Draft SEIR, along with more precise equipment specifications to ensure that no significant noise impacts occur during the nighttime hours of operation.

The employees located within the active landfill operational areas are considered to be sensitive noise receptors. The federal OSHA Standards regulate an individual workers noise exposure level based on an eight hour work day. The exposure level is based on the noise level of the source and the duration that the worker is exposed to the noise. Based on the noise emission levels of the proposed mechanical equipment and the hours of the facilities operation, workers located within the refuge acceptance area may be exposed to noise levels above the OSHA regulations, and may require additional personal protective equipment to ensure safe working conditions.

Additionally, the current landfill facility administrative employees (located in temporary on-site buildings) are considered to be sensitive noise receptors due to the location of the administrative buildings and the distance to the proposed project site. The noise impacts to the administrative employees are dependent on the building construction including typical exterior wall materials, windows, and roof assemblies.

In general, the presence of steep canyon walls serves as a shielding mechanism for the propagation of noise. However, a detailed analysis of noise associated with the proposed project and site topography is required to assess potential noise impacts associated with the proposed project. In the event that noise impacts are identified upon further analysis, the project would be required to deploy mitigation measures such as construction of a sound blanket wall, acoustic designed equipment enclosures, or other standard measures to dampen noise. However, due to the limited data available at this time, these issues are considered a potentially significant impact of the proposed project and will be further evaluated in the Draft SEIR.

b) The operation and construction of the proposed facility would include the use of equipment that would generate ground-borne vibration. Possible sources of vibration may include any hard mounted turbine units, the enclosed flare unit, graders, dump trucks, backhoes, compactors, pile driving and other vibration intensive equipment.

A preliminary review of vibration impacts due to the proposed project indicates that this impact would likely be considered less than significant due to the fact that the proposed project site is located within an operational landfill with large earth moving equipment operating on almost a daily basis. In fact, the majority of equipment that would be used during construction of the proposed facility would be smaller than that currently used to manage waste within the landfill operations. However, sufficient information is not available at this time to fully analyze the vibration impacts associated with the proposed facility and equipment. Additional information with regard to the vibration potential of long-term operation of facility equipment and where necessary, soil propagation rates, are required to provide an appropriate analysis of this issue. In the event that vibration is found to be a significant impact of the proposed project, mitigation measures such as specific foundation design requirements, could be implemented would help reduce the vibration generated as part of the proposed project, and would therefore reduce any significant impacts to less than significant levels. This issue will be further evaluated in the Draft SEIR.

c) The 1998 SEIR states that the ambient noise level within the vicinity of the project site is 52.4 dBA. Based on the combined noise level for the proposed facility equipment (105 dBA), permanent increases to the ambient noise levels within the vicinity of the project site may occur, particularly in the vicinity of the landfill facility administrative buildings and to workers located within the refuge acceptance area. An evaluation of the present day ambient noise level, as well as the facilities' noise impacts to the surrounding residential area, is required to define current noise conditions within the project area and determine if the increase in noise levels due to the proposed project creates a substantial permanent increase in ambient noise levels in the project vicinity. Therefore, this issue will be further evaluated in the Draft SEIR.

d) Construction noise can cause temporary impacts on ambient noise levels because the levels emitted by construction activities can produce high noise levels over a short period of time. The significance of the construction noise impacts to the surrounding area is based on the type of equipment used and the duration of the activities. At this time, limited information is available for the construction equipment and there is not enough information to evaluate construction noise impacts.

Ongoing service vehicles and equipment providing necessary operational maintenance for the proposed facility may also cause temporary noise impacts which may increase the ambient noise levels. The significance of service related noise impacts is based on the frequency of the required maintenance and the noise emission levels of the maintenance equipment. For the most part, very few service vehicles and operational equipment would be required once the proposed facility is constructed. Additionally, as required by the CUP and MMRS, all landfill equipment must be equipped with low-noise mufflers and air flow silencers on intake systems (if available) and must be properly maintained. Mobile and stationary internal-combustion-engine powered equipment or machinery associated with the proposed project would also be equipped with suitable exhaust and air-intake silencers to be periodically checked and measured on an annual basis to ensure proper working order. Implementation of this mitigation measure would likely reduce this impact to less than significant levels; however at this time there is not enough information to fully evaluate the noise impacts from the service vehicles and necessary related ancillary equipment. Therefore, this issue will be further evaluated in the Draft SEIR.

e) The proposed project is not located within a two mile vicinity of any public airport or public use airport.

f) The proposed project is not located within a two mile vicinity of a private airstrip.

Based on these considerations, significant adverse noise impacts are anticipated and will be further analyzed in the Draft SEIR.

	Potentially Significant Impact	**Less Than Significant Impact**	**No Impact**
XIII. POPULATION AND HOUSING. Would the project result in:			
a) Induce substantial growth in an area either directly (for example, by proposing new homes	☐	☐	☑

		Potentially Significant Impact	Less Than Significant Impact	No Impact
	and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?			
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☑
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☑

POPULATION AND HOUSING DISCUSSION

Environmental impacts associated with population and housing were not identified as a project issue in the 1993 FEIR or the 1998 SEIR.

Significance Criteria

The impacts of the proposed project on population and housing will be considered significant if any of the following criteria are exceeded:

- The demand for temporary or permanent housing exceeds the existing supply; or
- The proposed project produces additional population, housing or employment inconsistent with adopted plans either in terms of overall amount or location.

XIII. a) – c) The proposed project will not require any actions that will, either directly or indirectly, induce growth or adversely affect population or population distribution. The proposed project is not a growth-inducing project. The proposed project would not create residential units, significantly impact job opportunities, or influence property values in the surrounding communities. The proposed project would facilitate energy recovery from the LFG currently flared at the landfill site. It is expected that the proposed project would require hiring three new employees. It is expected that three additional employees could be selected from the existing employee pool in southern California. The proposed project would not result in growth but would help alleviate the increasing energy needs of the State of California. Accordingly, the proposed project would not cause impacts to population projections beyond those analyzed in the FEIR and SEIR, and those impacts were not considered significant. Therefore, no further analysis of the issue is required.

The proposed project would be located within the boundaries of Sunshine Canyon Landfill. There are no temporary or permanent housing units on the landfill site. Accordingly, the proposed project would not displace any housing and, as such, would have no impact on the existing housing supply. Therefore, no further analysis of the issue is required.

Based on these considerations, significant adverse population and housing impacts are not anticipated and will not be further analyzed in the Draft SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES. Would the proposal result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:			
a) Fire protection?	☐	☐	☑
b) Police protection?	☐	☐	☑
c) Schools?	☐	☐	☑
d) Parks?	☐	☐	☑
e) Other public facilities?	☐	☐	☑

PUBLIC SERVICES DISCUSSION

Previous environmental analyses of landfill projects have resulted in the development of mitigation measures to reduce potentially significant impacts to public services. As part of the MMRS, the landfill operator maintains on-site fire response capabilities. The proposed project would coordinate with the landfill operator and the County Fire Department to ensure that the appropriate fire safety measures are implemented as per the following mitigation measure:

- The permittee shall maintain on-site fire response capabilities, construct access roads, provide water tanks, water mains, fire hydrants and fire flows and perform brush clearance to the satisfaction of the County Forester and Fire Warden. The landfill will comply with all applicable County codes and ordinances which delineated the requirements for fire access, water mains, fire flows and fire hydrants, specifically defined by the County Fire Department. New construction of water tanks, water mains and fire hydrants will be completed to meet the fire flow requirements of the Fire Department.

Significance Criteria

- Impacts on public services would be considered significant if the project results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time or other performance objectives.

XIV. a) – b) The proposed project does not require any action that would alter and, thereby, adversely affect existing public services, or require an increase in governmental facilities or services to support the affected facilities, as explained in the following paragraphs.

In regard to fire protection and police services, the Los Angeles County Fire Department (LACFD) provides fire protection and paramedic services to the County portion of the Sunshine Canyon Landfill, where the proposed project would be located. LACFD Station 124 (25111 Pico Canyon Road) is the primary respondent to the project site. The Los Angeles County Sheriff's Department (LASD) serves the County portion of the landfill. LASD Santa Clarita Valley Station (23740 Magic Mountain Parkway) currently serves the project site. The proposed project would not involve development of dwelling units that would require additional fire and sheriff staff to service the area and maintain service ratio levels. Furthermore, as discussed in detail in Section 3 (Traffic/Access) of this document, the proposed project would generate minimal new vehicle trips. In addition, construction activities would occur on site and would not interrupt vehicle access on major roadways surrounding the Sunshine Canyon Landfill that would result in decreased response times for these services. Existing staffing at the fire station and sheriff substation serving the landfill is adequate to serve the proposed project site. However, the proposed project would be equipped with a fire extinguisher system that would be installed as part of the turbine enclosures, which would reduce the possibility of uncontrolled fires due to the proposed facility. Accordingly, the proposed project would not have any impacts beyond those described in the FEIR and SEIR, and those impacts were not considered significant. Therefore, no further analysis of the issue is required.

Special law enforcement problems are not associated with the project area. However, brush fires, landfill subsurface fires, and fires generated by the discharge of hot loads from waste trucks all have the potential to occur within the landfill. Nonetheless, the proposed project would be required to comply with applicable codes and regulations including, but not limited to, the Uniform Building Code, Uniform Mechanical Code, fire safety codes, and building safety to ensure that potential fire hazards or fire incidents are minimized. Therefore, the impacts are not expected to be significant and no further analysis of this issue is required.

XIV. c) – e) The proposed project will not directly or indirectly induce population growth in the area, either locally or regionally. Operation of the proposed project is expected to require only three additional employees. As such, the proposed project will not result in substantial adverse physical impacts on schools, parks, or other public facilities, or create the need for new additional schools, parks, or other public facilities. Therefore, the proposed project is not a growth-inducing project.

Additionally, the proposed project would not create residential units, significantly impact job opportunities, or influence property values in the surrounding communities. As such, the proposed project would not induce growth or otherwise increase demand for recreational facilities. Accordingly, the proposed project would not result in the impacts to recreational facilities beyond those analyzed in the FEIR and SEIR, and those impacts were not considered significant. Therefore, no further analysis of the issue is required.

Based on these considerations, significant adverse public service impacts are not anticipated and will not be further analyzed in the Draft SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XV. RECREATION.			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☑
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☑

RECREATION DISCUSSION

Environmental impacts associated with recreation were not identified as a project issue in the 1993 FEIR or the 1998 SEIR.

Significance Criteria

The impacts to recreation will be considered significant if:

- The project results in an increased demand for neighborhood or regional parks or other recreational facilities; or
- The project adversely affects existing recreational opportunities.

XV. a) and b) The proposed project does not require any action that will promote or alter existing population growth or densities in the area locally or regionally as operation of the proposed project would only require three additional employees. Furthermore, there are no provisions of the proposed project that would directly or indirectly affect any land use plans, policies or ordinances, or regulations. As a result, no provisions of the proposed project would either directly or indirectly cause an increase in population that would increase the use of neighborhood/regional parks or recreational facilities, thereby causing any accelerated deterioration. Further, the proposed project will not involve the use of recreational facilities or require the construction of new or expansion of existing recreational facilities to the detriment of the environment.

Based on these considerations, significant adverse recreation impacts are not anticipated and will not be further analyzed in the Draft SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

		Potentially Significant Impact	Less Than Significant Impact	No Impact
XVI.	**SOLID/HAZARDOUS WASTE.** Would the project:			
a)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☑
b)	Comply with federal, state, and local statutes and regulations related to solid and hazardous waste?	☐	☐	☑

SOLID/HAZARDOUS WASTE DISCUSSION

Previous environmental analyses of landfill projects have identified potentially significant impacts due to solid and hazardous waste. However, these impacts were directly associated with the acceptance of solid waste at the landfill and mitigation measures were identified to reduce the potential for hazardous waste to be placed in the landfill, as the Sunshine Canyon Landfill is classified as a non-hazardous waste facility. Therefore, the mitigation measures specified in the MMRS are not directly applicable to the proposed project.

Significance Criteria

The proposed project would not makes significant impacts to land use identified from previous analyses substantially worse or create a new significant impact. The proposed project impacts on solid and hazardous waste will be considered significant if the following occurs:

- The generation and disposal of hazardous and non-hazardous waste exceeds the capacity of designated landfills.

XVI. a) and b) There are no provisions of the proposed project that would alter the current generation or disposal of non-hazardous solid waste or hazardous solid waste at the Sunshine Canyon Landfill once operational. The proposed project would result in the construction of a new energy producing facility that would be fueled by the LFG that is currently flared on the Sunshine Canyon Landfill site. Accordingly, no impacts are expected to occur. Therefore, no further analysis of this issue is required.

The proposed project would potentially generate an oily wastewater that would be generated from processing of LFG through the compressor system, however the proposed project is not expected to generate any wastewater that would be classified as hazardous waste. If any hazardous waste is generated, it would be properly disposed of at a landfill that is authorized to accept such waste, or through appropriate waste management strategies.

Based on these considerations, significant adverse solid/hazardous waste impacts are not anticipated and will not be further analyzed in the Draft SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

		Potentially Significant Impact	Less Than Significant Impact	No Impact
XVII.	**TRANSPORTATION/TRAFFIC.** Would the project:			
a)	Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☑
b)	Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☑
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☑
d)	Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☑
e)	Result in inadequate emergency access or access to nearby uses?	☐	☐	☑
f)	Result in inadequate parking capacity?	☐	☐	☑
g)	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)?	☐	☐	☑

TRANSPORTATION/TRAFFIC DISCUSSION

Previous environmental analyses of landfill projects have identified potentially significant impacts to transportation and traffic in the project vicinity. These impacts are directly associated with the daily delivery of waste to the landfill and indirectly with cumulative impacts from reasonably foreseen projects that would be built in the vicinity of the landfill expansion. Significant impacts on traffic conditions due to the landfill expansion were identified at the following five key intersections:

- Roxford Street at the I-5 Freeway (SB ramp)
- Roxford Street at Encinitas/I-NB Ramps
- San Fernando Road at Balboa Boulevard
- San Fernando Road at Sierra Highway
- San Fernando Road at Sunshine Canyon Landfill.

Based on the analyses presented in the FEIR, SEIR, and Addendum, mitigation measures were identified to address the landfill expansion traffic issues, and these mitigation measures have or will be incorporated into the landfill expansion project. Specifically, the Project Proponent for the landfill expansion has addressed the traffic mitigation measures in the form of funding for Los Angeles Department of Transportation projects (specifically the San Diego Freeway Corridor Phase I ATSAC System) for design and construction of improvements for San Fernando Road and Balboa Boulevard; the Project Proponent designed and constructed a traffic signal at Sierra Highway and San Fernando Road and re-striped Sierra Highway to create a separate left-turn lane and shared left/right-turn lane on the westbound approach of Sierra Highway; the Project Proponent installed a new traffic signal at San Fernando Road/Project Driveway and widened and re-striped the northbound approach of San Fernando Road to provide a left-turn lane and a through lane; and the Project Proponent also filed a bond in the amount of $200,000 to the City of Los Angeles for any street improvements and signal modifications not completed at the time that the Findings of Fact were filed for the FEIR/SEIR/Addendum for the Sunshine Canyon Landfill - County Project 00-194, in November 2006. In addition to these mitigation measures, the Project Proponent for the landfill expansion has a program to avert wasted trips to the landfill and illegal disposal when the landfill meets its weekly and/or daily maximum limit, and has provided $125,000 to fund the construction of a traffic signal for improvements along San Fernando Road, if and when it is pursued by Los Angeles Department of Transportation in conjunction with other improvements along San Fernando Road.

The mitigation measures described above were also intended to help avoid potential significant effects to safety, as the landfill expansion project would generate additional truck traffic along San Fernando Road resulting in potential circulation safety problems at the landfill entrance. In addition to these measures, the Project Proponent for the landfill expansion has implemented additional mitigation measures to increase safety issues associated with truck traffic along San Fernando Road.

Construction traffic differs in numbers from traffic during the proposed project operational hours, as approximately 60 daily trips are anticipated during some of the construction stages. To mitigate the effects of construction traffic during these stages, BMPs established by the Sunshine Canyon Landfill will be employed (see Section XVII. a) and b) of this report).

The proposed project would not increase the capacity of the landfill or increase the amount of waste that the landfill is able to accept, and would only increase the number of trips to the landfill by up to13 additional trips per day. By comparison, based on actual trip rates developed from the existing County side of the landfill in 2002, the 2004 traffic study projected that the proposed landfill expansion project (within the City jurisdiction) would generate up to 319 trips per day (as stated in the Findings of Fact FEIR/SEIR/Addendum for the Sunshine Canyon Landfill - County Project 00-194, dated November 2006).

Although the mitigation measures specified in the MMRS are not directly applicable to the proposed project, the implementation of these mitigation measures by the Project Proponent for the landfill expansion project has resulted in improvements to road conditions which would accommodate the additional flux of traffic to the site.

Significance Criteria

The impacts on transportation/traffic would be considered significant if any of the following criteria are met:

- Peak period levels on major arterials are disrupted to a point where level of service (LOS) is reduced to D, E or F for more than one month;
- An intersection's volume to capacity ratio increase by 0.02 (two percent) or more when the LOS is already D, E or F;
- A major roadway is closed to all through traffic, and no alternate route is available;
- There is an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system;
- The demand for parking facilities is substantially increased;
- Waterborne, rail car or air traffic is substantially altered; or
- Traffic hazards to motor vehicles, bicyclists or pedestrians are substantially increased.

The proposed project would not make significant impacts to transportation or traffic, as identified from previous analyses, substantially worse or create a new significant impact.

XVII. a) and b) The proposed project would not involve construction of any dwelling units. The proposed project involves the development of an electricity generation facility, which would generate minimal additional trips. Occasional trips (likely up to four per month) to and from the project site for facility maintenance, general deliveries, and waste removal as necessary, would occur. In addition, up to four new employees would make up to two trips to and from the plant daily. Beyond these, no trips would be generated by the proposed project.

By comparison, a traffic study completed in 2002 found that the existing landfill generates approximately 850 trips per day. If a conservative growth rate of 0.5% is used to project the number of trips in year 2010 when the proposed SGPREP project would likely be implemented, the landfill would generate 885 trips a day. Additionally, the study suggested that the proposed landfill expansion would generate an additional 319 trips per day (as stated in the Findings of Fact FEIR/SEIR/Addendum for the Sunshine Canyon Landfill - County Project 00-194, dated November 2006). That brings the total number of trips to the site to 1,204 trips per day.

The proposed SGPREP project would generate only about 16 trips (or 8 trips to and from the proposed project site) a day during normal operations plus an additional eight trips (or four trips

to and from the proposed project site) per month for regular facility maintenance, general deliveries and waste removal. Because the number of trips generated by the proposed SGPREP project is only approximately 1.5% of the already existing and anticipated trips (generated by the landfill expansion), roadway and intersection improvements specified in the MMRS would be sufficient to accommodate the additional trips to the site. Accordingly, the proposed project would not have any traffic impacts beyond those described in the FEIR and SEIR as implementation of the proposed project results in approximately 1.5% traffic volume increase. Additionally, those impacts described in the FEIR and SEIR were determined to be less than significant after mitigation. Therefore, no further analysis of the issue is required.

Construction traffic would likely occur over the course of one year and three months through implementation of approximately six phases of development. Each phase would last between one and four months, as described below:

- Phase one would be implemented over the first three months and would entail delivery of imported soil. Up to 40,000 cubic yards of soil may need to be imported, and approximately 25,500 cubic yards of soil would be delivered during phase one of construction, which would involve approximately 33 to 34 dump trucks per day holding approximately 10 cubic yards of soil over the course of approximately 74 working days. Additionally, one dozer would be delivered the first day of soil deliveries, and one equipment operator and supervisor would drive to and from the site in up to two personal or company vehicles. This would result in up to 74 to 76 trips (or 37 to 38 trips to and from the proposed project site) per day; or up to 140 passenger car equivalents (PCEs) per day.

- Phase two would be implemented over the next three months of construction and would entail delivering large earth moving equipment that would be used for excavation, site preparation, and civil construction. Additionally, if a total of 40,000 cubic yards of soil need to be imported, the additional 14,500 cubic yards of soil would be delivered during phase two of the construction schedule. During phase two, soil deliveries would be made with approximately 30 dump trucks per day holding approximately 10 cubic yards of soil for 49 working days. Additionally up to 10 equipment operators and supervisors would travel to and from the site in up to five personal or company vehicles. This would result in up to 70 trips (or 35 trips to and from the proposed project site) per day; or up to 130 PCEs per day.

- Phase three would be implemented over the next one to two months and would entail laying foundations and underground piping, including delivery of various construction materials. Concrete trucks would bring cement at a rate of up to four loads per day for approximately 10 days. Additionally, up to 20 on-site personnel in up to 10 personal or company vehicles would travel to and from the site. This would result in up to 28 trips (or 14 trips to and from the proposed project site) per day; or up to 36 PCEs per day.

- Phase four would be implemented over the following one to two months and would entail the delivery of the facility equipment, including large equipment such as turbines and step-up transformers. Additionally, up to eight on-site personnel would drive to and from

the site in up to five personal or work vehicles. This would result in up to 28 trips (or 14 trips to and from the proposed project site) per day; or up to 54 PCEs per day.

- Phase five would be implemented over the following four months and would entail various construction activities such as installation of piping and wires. Up to thirty construction workers and supervisors would drive to and from the site in up to thirty on-site personal or work vehicles. This would result in up to 60 trips (or 30 trips to and from the proposed project site) per day in passenger vehicles.

- Phase six would be implemented over the following one to two months and would entail miscellaneous work including painting and commissioning of the plant. This work would require up to 15 on-site personnel would drive to and from the site in up to 15 personal or work vehicles. This would result in up to 30 trips (or 15 trips to and from the proposed project site) per day in passenger vehicles.

As described in the 1997 Draft SEIR for the landfill expansion project, the City/County Landfill Project will be constructed in phases and would occur throughout project development. The analysis of construction related impacts to traffic assumed that during construction activities, that on-site personnel would not exceed 70 persons and assumed one person per vehicle. Specifically, during construction activities, approximately 140 trips (or 70 trips to and from the landfill) per day would occur. Additionally, the number of trucks bringing construction related material would be limited to a maximum of five vehicles per day and would generate up to 16 trips (or eight round trips to and from the landfill) per day. The results of the analysis concluded that no significant impacts would occur and no mitigation measures were required for the landfill to conduct construction projects.

The total number of construction related trips to and from the landfill for the proposed project would be below the PCE of 140 trips plus the landfill expansion project estimate of an additional 16 trips per day due to the delivery of construction related material during any of the six phases of construction described above. Additionally, best management practices would be implemented and include staging construction traffic at off-peak times to the extent possible, and working closely with the Sunshine Canyon Landfill personnel to ensure that construction related traffic remains below the assumed values used in the SEIR. Accordingly, the proposed project would not have any traffic impacts beyond those described in the FEIR and SEIR, and those impacts were determined to be less than significant after mitigation. Therefore, no further analysis of the issue is required.

XVII. c) The proposed project would not result in changes to air, rail, or water traffic conditions that were not previously addressed in the FEIR and SEIR. The proposed project is located near railroad operations, but is not located within two miles of an airport, private airstrip, or water ways. The proposed project would not encroach or affect the operations of any railway, as the proposed project would be located approximately 6,800 feet away from the railroad tracks and would not result in substantial new traffic that would interfere with the operation of the railroad tracks. Because the vertical height of the proposed project would not exceed a three-story building and the top of the proposed project would be below the nearby ridgeline, the proposed project would not result in a change in air traffic patterns and therefore would not result in

substantial safety risks. No other transportation impacts would occur. Therefore, no further analysis of the issue is required.

XVII. d), e), f) and g) The proposed project would not include any design features, such as the alteration of a roadway, additional parking spaces, etc., that would create any hazardous traffic conditions. The proposed facility would be placed in an area where it would not pose any hazards or barriers for pedestrian, bicyclists, or motorists. Accordingly, no impacts would occur regarding safety hazards. Therefore, no further analysis of the issue is required.

Implementation of the proposed project would not change the planned emergency access in the surrounding area. Further, access to nearby uses would not be altered from the original landfill design. Accordingly, there are no impacts associated with emergency access. Therefore, no further analysis of the issue is required.

The proposed project would not affect the parking capacity in the project area. As discussed in response (a), the proposed project would generate commute trips for up to four new employees to the site each day during the week and up to three additional trips per month to and from the project site for facility maintenance, general deliveries, and waste management. Beyond the number of trips described, additional trips and associated parking would not be generated by the proposed project. Accordingly, no impacts would occur regarding parking. Therefore, no further analysis of the issue is required.

As discussed in response (a), the proposed project would generate up to three trips per day by new plant employees plus up to four additional trips per month to and from the project site for facility maintenance, general deliveries, and waste management. Beyond these trips, no other trips would be generated by the proposed project. The additional trips per day are considered an insignificant impact as it results in an approximate 4% increase in traffic to the Sunshine Canyon Landfill. Implementation of the project would not increase traffic levels beyond those analyzed in the FEIR and SEIR. Accordingly, there would be no additional traffic congestion impacts related to the proposed project. Therefore, no further analysis of the issue is required.

Based on these considerations, significant adverse transportation/traffic impacts are not anticipated and will not be further analyzed in the Draft SEIR. Because no significant impacts were identified, no mitigation measures are necessary or required.

		Potentially Significant Impact	Less Than Significant Impact	No Impact
XVIII.	**MANDATORY FINDINGS OF SIGNIFICANCE.**			
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☑
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a 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)	☑	☐	☐
c)	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☑	☐	☐

DISCUSSION OF MANDATORY FINDINGS OF SIGNIFICANCE

XVIII. a) The proposed project would be located on a site that is highly disturbed. No sensitive habitat, sensitive species, or substantial natural resources are located on the proposed project site that could be substantially degraded as a result of the development of an electricity generation facility. Likewise, no examples of major periods of California history or prehistory would be affected due to implementation of the proposed project because the site has already been heavily disturbed and cultural resources have not been identified to date. Because the proposed project would be located within the boundaries of Sunshine Canyon Landfill, the project operators would be required to implement applicable mitigation measures from the FEIR and SEIR to ensure that the project does not substantially degrade the quality of the environment. Accordingly, the proposed project will not have any significant impacts beyond those described in the FEIR and SEIR. Therefore, no further analysis of the issue is required.

XVIII. b) Project-specific impacts for the proposed project are individually limited and not cumulatively considerable as they relate to geology, flooding, fire, noise, water quality, cultural resources, mineral resources, agricultural resources, visual qualities, traffic and access, sewage

disposal, education, public services and utilities, environmental safety, land use and population, housing, employment, and recreation. As identified in the Initial Study, it was concluded that these environmental topic areas would not be significantly affected by the proposed project. As a result, impacts to these environmental topic areas are not considered to be cumulatively considerable pursuant to CEQA Guidelines §15064(h)(1). Therefore, the proposed project is not expected to generate significant adverse cumulative impacts in the referenced environmental topic areas. However, further analysis is required to determine whether the proposed project would result in individually significant impacts and thereby cumulatively considerable with respect to air quality. Further analysis of air quality is required to determine the significance of the impacts when compared to applicable thresholds.

XVIII. c) As discussed in this Initial Study, the proposed project would be located on the northern portion of Sunshine Canyon Landfill away from residential uses and sensitive receptors. However, as discussed in response (b) above, air quality effects may be considered significant and will be further studied in a Draft SEIR. As such, the proposed project may result in adverse affects to human beings indirectly due to air quality impacts from the proposed project.

APPENDIX 1-1

SUNSHINE CANYON LANDFILL MITIGATION MONITORING AND REPORTING SUMMARY

This appendix can be found as Appendix B of the

Sunshine Gas Producers Renewable Energy Project Draft SEIR

APPENDIX 2-1

LETTER FROM LOS ANGELES COUNTY DEPARTMENT OF REGIONAL PLANNING

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Bruce W. McClendon, FAICP
Director of Planning

December 2, 2008

Steve Smith, Ph.D.
Program Supervisor – CEQA Section
SCAQMD
21865 Copley Drive
Diamond Bar, CA. 91765

Regarding: CEQA application for the SGP Landfill Gas to Energy project

Dear Dr. Smith:

This is to provide written notification that the County Department of Regional Planning declines the role of lead agency for the Sunshine Gas Producers Landfill Gas to Energy project at the Sunshine Canyon Landfilll. Staff has reviewed the proposed project and has found that it is within the scope of work previously approved under a Conditional Use Permit to construct, operate and maintain the landfill.

If you have any further questions please contact Anita Gutierrez or Mark Child in the Zoning Permits Section I at (213) 974-6443.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Bruce W. McClendon, FAICP
Director of Planning

Mark Child, Supervising Regional Planner
Zoning Permits I Section

c: Michael Mann, DTE Biomass Energy

MC:ag