



Toland Optimization Plan

Revised Initial Study

prepared by

Ventura Regional Sanitation District (VRSD)

1001 Partridge Drive, Suite 150

Ventura, California 93003

Contact: Chris Theisen, General Manager

prepared with the assistance of

Rincon Consultants, Inc.

180 North Ashwood Avenue

Ventura, California 93003

September 2019



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Environmental Scientists | Planners | Engineers

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1 Project Description

This Initial Study is an analysis of the potential environmental impacts of the proposed Toland Road Landfill (TRL) Optimization Plan located in unincorporated Ventura County. This Initial Study has been prepared by Rincon Consultants, Inc. under contract to Ventura Regional Sanitation District (VRSD) for use in support of the environmental documentation being prepared pursuant to the California Environmental Quality Act (CEQA) (Pub. Res. Code §21000) and the CEQA Guidelines (14 Cal. Code of Regs., §15000 et seq.). A project summary is provided in Table 1.

Table 1 Project Summary

Item	Description
1. Name of Applicant:	Ventura Regional Sanitation District (VRSD) 1001 Partridge Drive, Suite 150, Ventura, California 93003-0704
2. Project Location and Assessor's Parcel Number:	The proposed project location is 3500 Toland Road in unincorporated Ventura County. The project site is approximately 1.7 miles north of State Highway 126, between the cities of Santa Paula and Fillmore. The Tax Assessor's parcel numbers for the property that comprises the 214-acre project site are APNs: 041 0 140 090, 041-0-140-100, and 041-0-140-235 (See Figure 1, <i>Project Location</i>).
3. General Plan Land Use Designation and Zoning Designation of the Project Site:	
a. General Plan Land Use Designation:	Open Space
b. Area Plan Designation:	N/A
c. Zoning Designation:	Open Space (OS)
4. Description of the Environmental Setting:	TRL is located in a rural area of Ventura County, California, between the cities of Santa Paula and Fillmore. Surrounding land uses within two miles of the landfill consist of open space, agricultural land (primarily avocado and citrus orchards) with a few scattered residences, a school (located on the opposite side of State Highway 126), and an undeveloped County regional park.
5. Project Description:	As part of the Conditional Use Permit (CUP) Modification Request, VRSD does not propose to change the approved final grades of the landfill, equipment used on site, the days or hours of operation, nor type of waste accepted. VRSD requests the following modifications to CUP No. 3141: <ol style="list-style-type: none"> 1. Eliminate the existing maximum permitted daily tons of 1,500 tpd (Condition 3.j) and replace it with a condition that allows a maximum daily Municipal Solid Waste tonnage to be based on the capacity of 152 heavy truck trips per day as evaluated in the 1996 Final EIR for the current CUP; 2. Eliminate the 2027 closure date (Condition 5.a.2.b); 3. Eliminate the 15-million-ton lifetime cap (Condition 5.a.2.c); 4. Allow TRL to be filled to its maximum elevation of 1,435 feet above mean sea level as set forth in the current CUP; and 5. Modify the CUP Conditions of Approval related to the decommissioned biosolids facility

Item	Description
6. List of Responsible and Trustee Agencies:	County of Ventura, California Department of Resource Recycling and Recovery (CalRecycle), California Department of Fish and Wildlife, Los Angeles Regional Water Quality Control Board, Ventura County Air Pollution Control District
7. Methodology for Evaluating Cumulative Impacts:	The List Approach was used in the analysis of this Initial Study (see Section 2, <i>Impact Analysis</i> .)

Background

The proposed project is located in an unincorporated area of Ventura County between the cities of Santa Paula and Fillmore. Toland Road Landfill (TRL) is located in a confined V-shaped side canyon (i.e., a box canyon) between an unnamed creek to the east and the southerly-trending Timber Canyon originating from Santa Paula Peak. O’Leary Creek flows in a southerly direction, approximately 750 feet west of the TRL footprint, towards Santa Clara River. The existing site topography varies from gently to steeply sloping hills. The vegetation on site, outside of the landfill footprint consists of coastal sage scrub and ruderal grasslands. The southern, western, and eastern boundaries of the site consist of open space and citrus and avocado orchards. The area north of the site is predominantly open space. The facility is located in the open space zone district. Regional access to the site is from State Highway 126 (approximately 1.2 miles to the south) and local access is provided from Toland Road. TRL has been operating continuously since 1970.

TRL is owned and operated by the Ventura Regional Sanitation District (VRSD), a public agency formed in accordance with California Health and Safety Code § 4700 et seq., and it currently serves the municipal solid waste disposal needs of the Cities of Ventura, Oxnard, Thousand Oaks, Ojai, Santa Paula, Fillmore, Camarillo, Port Hueneme and surrounding unincorporated areas. It is currently permitted to receive 1,500 tons per day (tpd) of waste. It has a permitted capacity of 15 million tons and the maximum landfill elevation is 1,435 feet above mean sea level (amsl). The landfill operates as a Class III municipal solid waste facility, as defined by the California Code of Regulations (CCR).

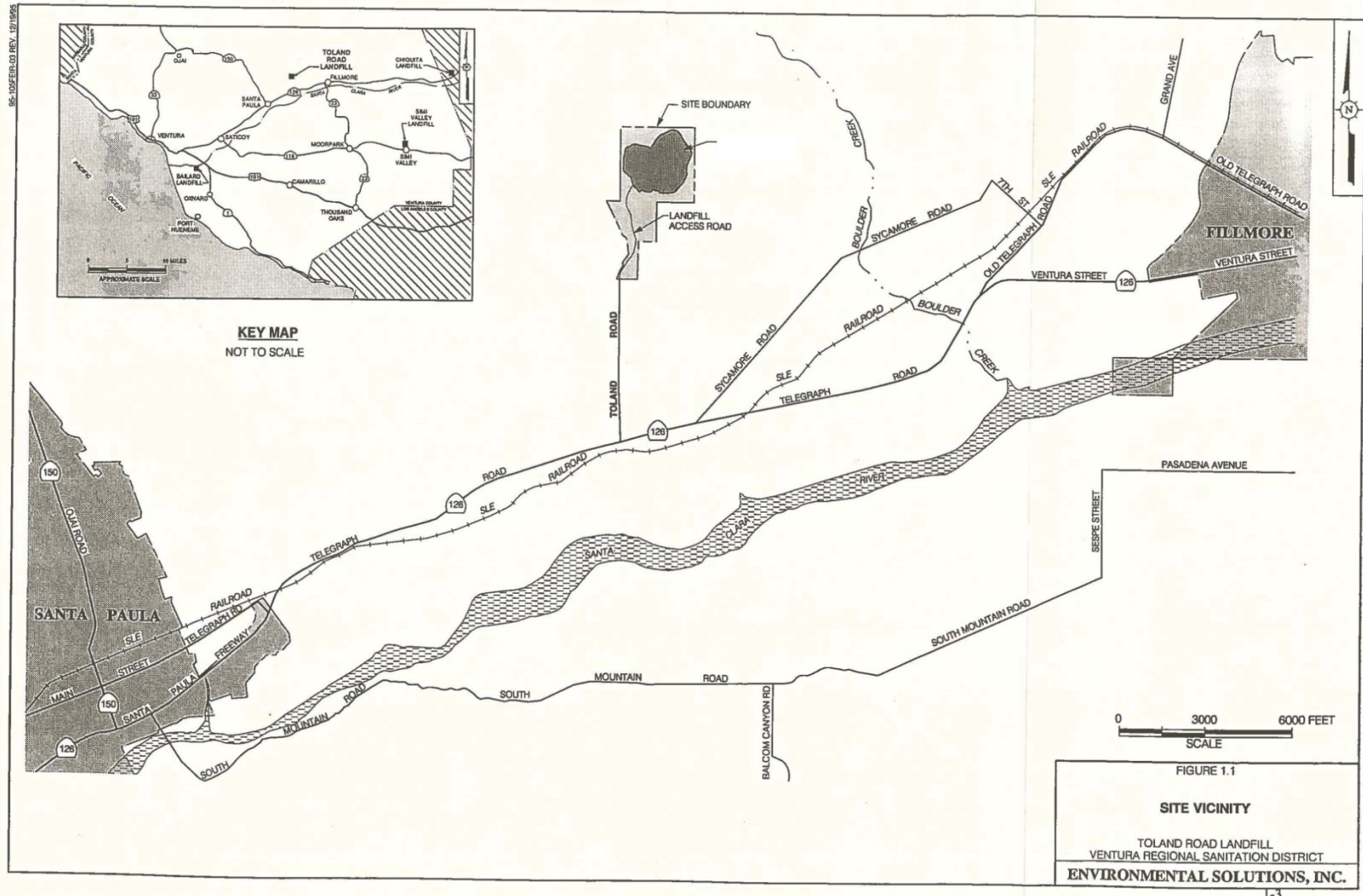
CUP Modification Request

VRSD is proposing to modify its current County-issued and approved CUP to reflect operational realities and to maximize an existing regional solid waste disposal capacity. Specifically, VRSD requests the following modifications to CUP No. 3141:

1. Eliminate the existing maximum permitted daily tons of 1,500 tpd (Condition 3.j) and replace it with a condition that allows a maximum daily Municipal Solid Waste (MSW) tonnage to be based on the capacity of 152 heavy truck trips per day as evaluated in the 1996 Final EIR for the current CUP;
2. Eliminate the 2027 closure date (Condition 5.a.2.b);
3. Eliminate the 15-million-ton lifetime cap (Condition 5.a.2.c);
4. Allow TRL to be filled to its maximum elevation of 1,435 feet above mean sea level as set forth in the current CUP; and
5. Modify the CUP Conditions of Approval related to the decommissioned biosolids facility.

The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. No impacts to the surrounding natural resources or agricultural operations would occur as part of this project.

Figure 1 Project Location



Source: VRSD 1996

Because VRSD does not propose any physical improvements or operational changes to TRL as part of this CUP modification request, CUP Condition 5.a.2.a that limits the acceptance of total MSW to the existing designated elevations and contours will remain in effect. This also means that the current CUP conditions that place a lifetime cap of 15 million tons of MSW to be buried at TRL (Condition 5.a.2.c) and the 2027 landfill closure date (Condition 5.a.2.b) are not necessary and should be eliminated. These conditions can and should be deleted from the CUP because they do not reflect current landfill engineering and operational realities.

Because the 1996 Final EIR for the current CUP previously evaluated potential environmental impacts associated with the delivery and deposit of MSW contained in 152 heavy truck trips per day to TRL, the current CUP limit of 1,500 tpd of MSW can and should be deleted in favor of a CUP condition that allows for the delivery and deposit of a maximum daily MSW tonnage at TRL that is equal to or less than the MSW capacity of 152 heavy truck trips per day to TRL. The current daily limit of 1,500 tpd of MSW at TRL is an artificial restriction on TRL operations which fails to recognize and allow for fluctuations and growth in MSW tonnage in the Western Ventura County watershed and advances in MSW compaction.

Because VRSD has decommissioned the biosolids processing facility and all other permits related to this facility have been updated to reflect the fact of its non-operational/decommissioned state, modification of conditions prescribed under CUP Modification No. 3 (LU-06-0111) related to the biosolids processing facility will make the TRL CUP consistent.

Project Objectives and Benefits

These proposed changes to the TRL CUP are in the public interest and for the public's benefit because they would maximize this publicly-financed and publicly-owned regional asset, especially for the Western Ventura County watershed.

The specific project objectives are:

- Utilize remaining MSW disposal capacity at TRL without expanding the operational footprint
- Ensure adequate financial resources are available for VRSD to oversee landfill operations, environmental compliance, and closure and post-closure operations at TRL
- Maximize in-county public waste disposal capacity at TRL which conforms to the Public Facilities, Services and Infrastructure Element in the existing and proposed amended County General Plan
- Maximize in-county waste disposal capacity at TRL which minimizes travel distances and related air pollutant and greenhouse gas emissions for waste hauling vehicles

Project benefits include, but are not limited to:

- Continued access to the only publicly-owned and publicly-operated Ventura County landfill for the Western Ventura County
- Continued low-cost, reliable MSW disposal capacity for Ventura County residents and businesses
- Continued public management of the western and central Ventura County waste-stream
- A reduction in vehicle miles travelled for transfer trucks delivering additional MSW, thereby generating fewer greenhouse gas and criteria pollutant emissions compared to the existing waste haul route

1996 Final EIR Baseline/Findings and Existing Conditions of Approval

The California Environmental Quality Act (CEQA) Guidelines Section 15082 requires the identification of “lead,” “responsible,” and “trustee” agencies. VRSD was the lead agency responsible for preparing the Certified Final EIR for the previously approved Toland Road Landfill Expansion Project (1996) and the IS-MND for the previously approved Bio-Solids Facility and Electric General Project (2006). Therefore, VRSD proposes to be the “lead agency” for the CUP Modification request, as it will be the public agency responsible for carrying out the proposed project (14 CCR § 15051[a]). County of Ventura will be a “responsible agency”, as it is a public agency other than the “lead agency” that has discretionary approval authority over certain components of a project.

Table 2 below summarizes the environmental impacts identified in the 1996 Certified Final EIR and the associated Conditions of Approval designed to reduce impacts within each environmental issue area. All of these Conditions of Approval would remain in place as part of the proposed project.

Table 2 CEQA Analysis Baseline and Findings/Existing Conditions of Approval

Impact	1996 FEIR Findings	2006 IS-MND Findings	EIR/IS-MND Mitigation Measures	CUP Conditions of Approval
Geology and Soils	PS-M	PS-M	EIR Section 3.2.7-1 IS-MND G-1 thru G-3	49, 50, 113-115
Water Resources	PS-M	PS-M	EIR Section 3.3.7-1,2 IS/MND WQ-1 thru WQ-6	18, 51-59, 104, 124
Biological Resources	PS-M	PS-M	EIR Section 3.4.7.1-1 IS-MND B-1 thru B-3	82, 97
Utilities, Services, and Housing	LS	LS	None Required	44, 69, 134-137
Cultural Resources	PS-M	PS-M	EIR Section 3.6.7-1,2 IS-MND C-1 thru C-5	83
Paleontological Resources	PS-M	PS-M	EIR Section 3.7.7-1 IS-MND C-4	84
Land Use	LS	LS	None Required	1-17, 85-87, 89-91, 94
Visual Resources	LS	LS	None Required	32-34, 70, 72, 81
Noise	Significant and Unavoidable Cumulative Impact	LS	EIR Section 3.10.7–1,2,3 IS/MND None Required	42(b), 43(c)(1-2), 46-47, 80
Traffic	Significant and Unavoidable Cumulative Impact - Caltrans oversight of Hwy. 126/Toland Rd. intersection improvements	LS	EIR Section 3.11.7-1,2 IS/MND None Required	42(a)(1-2), 79, 92-93, 98
Air Quality (Operational)	PS-M	PS-M	EIR Section 3.12.7-1 IS-MND A-1 thru A-17	42(d), 61-68

Ventura Regional Sanitation District (VRSD)
Toland Optimization Plan

Impact	1996 FEIR Findings	2006 IS-MND Findings	EIR/IS-MND Mitigation Measures	CUP Conditions of Approval
Air Quality (Mobile)	Significant and Unavoidable	PS-M	EIR Section 3.12.7-2 IS-MND A-1 thru A-17	42(d), 61-68, 125-133
Hazards/Health Risk Assessment	LS	LS	None Required	61-68, 77-78, 88, 99-100
Nuisance	LS	LS	None Required	61-68, 73-76
Health and Safety	LS	LS	None Required	48, 60, 71, 106-112, 117-123
Agricultural Resources	LS	PS-M	See IS-MND Air Quality Mitigation	N/A

Notes: CEQA = California Environmental Quality Act, FEIR = Final Environmental Impact Report, IS-MND = Initial Study – Mitigated Negative Declaration, EIR = Environmental Impact Report, CUP = Conditional Use Permit, PS-M = Potentially Significant, but Mitigable Impact, LS = Less than Significant Impact

Sources: VRSD 1996, VRSD 2006, Ventura County Resource Management Agency, Planning Division 1996

2 Impact Analysis

2.1 Determination of Environmental Document

2.1.1 Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, which would be studied further in a Supplemental EIR.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology and Soils |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

2.1.2 Preliminary Determination

Based on this initial evaluation a preliminary determination has been determined:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and 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 a significant effect in this case because revisions to 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 on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- I find that the proposed project **MAY** have a “potentially significant impact” or “potentially significant but mitigable” 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 potential 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.



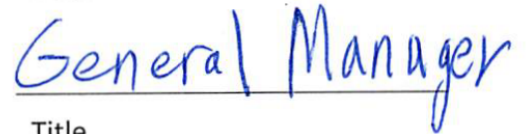
Signature



Printed Name



Date



Title

2.2 Methodology

The List Approach, as mentioned above, is used to analyze the impacts of the proposed project. The checklist is based on the Initial Study Assessment Guidelines (ISAG) (County of Ventura 2011).

2.3 Initial Study Checklist and Discussion of Responses

Table 3 Air Quality

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
1. Air Quality (VCAPCD)²		
Would the proposed project:		
1) Exceed any of the thresholds set forth in the air quality assessment guidelines as adopted and periodically updated by the Ventura County Air Pollution Control District (APCD), or be inconsistent with the Air Quality Management Plan?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 1 of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Ventura County Air Pollution Control District		

Impact Discussion

- 1.1) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Based on information provided by the applicant, including a draft Air Quality and Greenhouse Gas (GHG) Assessment prepared by Environmental Compliance Solutions (ECS), Inc. (ECS 2017), air quality impacts from the additional transfer trucks being rerouted to TRL would be a net reduction of criteria pollutants. These reductions would be below the 25 pounds per day threshold for reactive organic compounds and oxides of nitrogen as described in the Ventura County Air Quality Assessment Guidelines (APCD 2003). Therefore, the proposed project would have no impacts on regional air quality.
- 1.2) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. The subject project would generate local air quality impacts due to the transfer of waste material from the City of Oxnard to the Toland Road Landfill, but those impacts would not likely be significant. Implementation of existing APCD Conditions of Approval relating to fugitive dust, particulate matter and ozone precursor emissions that may result from vehicles driving or parking on the site and other project activities would ensure that project impacts would be less than significant. Therefore, the proposed project would be consistent with the applicable General Plan Goals and Policies for Item 1 of the ISAG.

Mitigation/Residual Impact(s)

None.

The threshold criteria in this Initial Study are derived from the ISAG. For additional information on the threshold criteria (e.g., definitions of issues and technical terms, and the methodology for analyzing each impact), please see the ISAG.

Table 4 Water Resources – Groundwater Quantity

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
2A. Water Resources – Groundwater Quantity (WPD)²		
Would the proposed project:		
1) Directly or indirectly decrease, either individually or cumulatively, the net quantity of groundwater in a groundwater basin that is overdrafted or create an overdrafted groundwater basin?	LS	LS
2) In groundwater basins that are not overdrafted, or are not in hydrologic continuity with an overdrafted basin, result in net groundwater extraction that will individually or cumulatively cause overdrafted basin(s)?	LS	LS
3) In areas where the groundwater basin and/or hydrologic unit condition is not well known or documented and there is evidence of overdraft based upon declining water levels in a well or wells, propose any net increase in groundwater extraction from that groundwater basin and/or hydrologic unit?	LS	LS
4) Regardless of items 1-3 above, result in 1.0 acre-feet, or less, of net annual increase in groundwater extraction?	LS	LS
5) Be consistent with the applicable General Plan Goals and Policies for Item 2A of the Initial Study Assessment Guidelines?	LS	LS

¹N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact

²Watershed Protection District

Impact Discussion

2A.1) – 2A.4) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, no new extraction of groundwater would result from the proposed project. The existing water requirement is provided by groundwater from a shared water well, located in the Fillmore Subbasin, managed by United Water Conservation District (United; United 2010). The Fillmore Subbasin relies on percolation of surface flow in the Santa Clara River, Sespe Creek, and minor tributary streams as its supply (Department of Water Resources [DWR] 2006). Therefore, the proposed project would have a less than significant impact, both project specific and cumulative, on the net quantity of groundwater in a groundwater basin that is over drafted or create an over drafted groundwater basin.

The proposed increase in MSW to TRL would not create a new demand for water, as all equipment, staff, and water used on a daily basis at TRL would not increase. Thus, project-specific and cumulative impacts on the quantity of available groundwater supplies would be less than significant.

- 2A.5) Based on the above discussion, the project would be consistent with the applicable General Plan Goals and Policies for Item 2A of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 5 Water Resources – Groundwater Quality

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
2B. Water Resources – Groundwater Quality (WPD)²		
Would the proposed project:		
1) Individually or cumulatively degrade the quality of groundwater and cause groundwater to exceed groundwater quality objectives set by the Basin Plan?	LS	LS
2) Cause the quality of groundwater to fail to meet the groundwater quality objectives by the Basin Plan?	LS	LS
3) Propose the use of groundwater in any capacity and be located within two miles of the boundary of a former or current test site for rocket engines?	N	N
4) Be consistent with the applicable General Plan Goals and Policies for Item 2B of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Watershed Protection District		

Impact Discussion

- 2B.1) and 2B.2) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, the proposed project will not individually or cumulatively degrade the quality of groundwater and cause groundwater to exceed groundwater quality objectives set by the Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) (Los Angeles Regional Water Quality Control Board [RWQCB] 2014). Wastewater for the proposed project will be handled by an existing on-site septic system. The septic system will have to continue meet regulations and permitting requirements set forth by the Los Angeles RWQCB. Therefore, the possible groundwater quality effects will be less than significant.
- 2B.3) The proposed project is not located within two miles of the boundary of a former or current test site for rocket engines. No new extraction of groundwater would result from the proposed project. The existing water requirement is provided by United. The Fillmore Subbasin relies on percolation of surface flow in the Santa Clara River, Sespe Creek, and minor tributary streams as its supply (DWR 2006).
- 2B.4) No new extraction of groundwater is anticipated with implementation of the proposed project. The existing water requirement is provided by United. The

Fillmore Subbasin relies on percolation of surface flow in the Santa Clara River, Sespe Creek, and minor tributary streams as its supply (DWR 2006). Therefore, the proposed project would, individually or cumulatively, have less than significant impacts to groundwater quality and it would be consistent with the applicable General Plan Goals and Policies for Item 2B of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 6 Water Resources – Surface Water Quantity

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
2C. Water Resources – Surface Water Quantity (WPD)²		
Would the proposed project:		
1) Increase surface water consumptive use (demand), either individually or cumulatively, in a fully appropriated stream reach as designated by SWRCB or where unappropriated surface water is unavailable?	N	N
2) Increase surface water consumptive use (demand) included but not limited to diversion or dewatering downstream reaches, either individually or cumulatively, resulting in an adverse impact to one or more of the beneficial uses listed in the Basin Plan?	N	N
3) Be consistent with the applicable General Plan Goals and Policies for Item 2C of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Watershed Protection District		

Impact Discussion

2C.1) – 2C.3) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. The existing water service is provided by United. The Fillmore Subbasin relies on percolation of surface flow in the Santa Clara River, Sespe Creek, and minor tributary streams as its supply (DWR 2006). Therefore, the proposed project would not increase surface water consumptive use (demand) or surface water quantity, either individually or cumulatively and it would be consistent with the applicable General Plan Goals and Policies for Item 2C of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s)

None.

Table 7 Water Resources – Surface Water Quality

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
2D. Water Resources – Surface Water Quality (WPD)²		
Would the proposed project:		
1) Individually or cumulatively degrade the quality of surface water causing it to exceed water quality objectives as contained in Chapter 3 of the three Basin Plans?	LS	LS
2) Directly or indirectly cause storm water quality to exceed water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits?	LS	LS
3) Be consistent with the applicable General Plan Goals and Policies for Item 2D of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Watershed Protection District		

Impact Discussion

- 2D.1) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. The existing drainage facilities will continue to capture and treat surface waters prior to off-site discharge in order to maintain water quality consistent with the objectives contained in Chapter 3 of the Basin Plan as applicable for this area. All of the existing Waste Discharge Requirements designed to protect water quality would remain in place. Therefore, impacts to surface water quality is considered less than significant.
- 2D.2) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, the proposed project will not directly or indirectly cause stormwater quality to exceed water quality objectives or standards in the California Industrial General Permit (IGP). The proposed project is located within the Ventura County Unincorporated Urban area and will involve no new soil disturbance relating to new construction. VRSD will continue to be required to implement a Stormwater Pollution Prevention Plan (SWPPP) for TRL. In addition, TRL is required by the IGP to sample and make visual observations for a minimum of four Qualified Storm Events annually and monthly visual inspections are conducted to assess potential for unauthorized discharges. Finally, the results of all stormwater sampling and monitoring activities are required to be reported annually to the RWQCB. All of the existing Waste Discharge Requirements (WDRs) designed to protect water quality would remain in place. Therefore, neither the individual project nor the cumulative threshold for significance would be exceeded and the project is expected to have a less than significant impact related to water quality objectives or standards in the applicable IGP.
- 2D.3) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. The proposed project will not individually or cumulatively degrade the quality of surface water causing it to exceed water quality objectives is contained in Chapter 3 of the Basin Plan as applicable for this area. The proposed project will involve no new soil disturbance relating to new

construction. VRSD will continue to be required to implement a SWPPP for TRL. In addition, TRL is required by the IGP to sample and make visual observations for a minimum of four Qualified Storm Events annually and monthly visual inspections are conducted to assess potential for unauthorized discharges. Finally, the results of all stormwater sampling and monitoring activities are required to be reported annually to the RWQCB. All existing WDRs designed to protect water quality would remain in place. Therefore, the proposed project is not expected to result in a violation of any surface water quality standards as defined in the Basin Plan. Therefore, proposed project is consistent with the applicable County of Ventura General Plan Goals and Policies for the ISAG Item 2d.

Mitigation/Residual Impact(s)

None.

Table 8 Mineral Resources – Aggregate

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
3A. Mineral Resources – Aggregate (Plng.)²		
Would the proposed project:		
1) Be located on or immediately adjacent to land zoned Mineral Resource Protection (MRP) overlay zone, or adjacent to a principal access road for a site that is the subject of an existing aggregate Conditional Use Permit (CUP), and have the potential to hamper or preclude extraction of or access to the aggregate resources?	N	N
2) Have a cumulative impact on aggregate resources if, when considered with other pending and recently approved projects in the area, the project hampers or precludes extraction or access to identified resources?	N	N
3) Be consistent with the applicable General Plan Goals and Policies for Item 3A of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Planning Division		

Impact Discussion

3A.1) – 3A.3) The proposed project would not be located on or immediately adjacent to land zoned Mineral Resource Protection (MRP) overlay zone, nor would it be adjacent to a principal access road for a site that is the subject of an existing aggregate Conditional Use Permit (CUP) (County of Ventura 2010, California Geological Survey [CGS] 2012). The proposed project would not have the potential to hamper or preclude extraction of or access to the aggregate resources. Therefore, the proposed project would have no impacts (individual or cumulative) to petroleum resources and it would be consistent with the applicable General Plan Goals and Policies for ISAG Item 3A.

Mitigation/Residual Impact(s)

None.

Table 9 Species

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
4A. Species		
Would the proposed project:		
1) Would the proposed project, directly or indirectly impact one or more plant and/or animal species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

4A.1) A biological resources impact assessment was conducted as part of the TRL 1996 FEIR. The study indicated that fourteen sensitive wildlife species potentially occurred in the project area or used on site or nearby local areas for foraging or travel. However, the report concluded that no federally- or State-protected sensitive species occurred in the project area and no significant impacts to biological resources would occur. The landfill is currently operating in compliance with all Conditions of Approval designed to protect biological resources.

The CUP Modification request will not modify the approved final grades or footprint of the landfill, equipment used on site, nor the type of waste accepted. Therefore, no impacts would occur.

Mitigation/Residual Impact(s)

No impacts to plant and animal species would occur since no construction is proposed, and no operational changes are proposed as part of the proposed project. VRSD will continue to comply with all applicable Conditions of Approval related to biological resources and species protection.

Table 10 Ecological Communities – Sensitive Plant Communities

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
4B. Ecological Communities – Sensitive Plant Communities		
Would the proposed project:		
1) Temporarily or permanently remove sensitive plant communities through construction, grading, clearing, or other activities?	N	N
2) Result in indirect impacts from project operation at levels that will degrade the health of a sensitive plant community?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

4B.1) and 4B.2) As discussed in Section 4A.1, sensitive plant communities were identified within a 5-mile radius of the project site but did not occur on site. The proposed project does not propose additional construction of the site or enlargement of the landfill footprint. In addition, VRSD is required to comply with Conditions of Approval related to sensitive plant communities and will continue to do so with the proposed project.

Therefore, the proposed project will not create project-specific direct or indirect impacts, or any cumulatively considerable contribution, to sensitive plant communities.

Mitigation/Residual Impact(s)

None.

Table 11 Ecological Communities – Water and Wetlands

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
4C. Ecological Communities – Water and Wetlands		
Would the proposed project:		
1) Cause any of the following activities within waters or wetlands: removal of vegetation; grading; obstruction or diversion of water flow; change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other unground piping; or any disturbance of the substratum?	N	N
2) Result in disruptions to wetland or riparian plant communities that will isolate or substantially interrupt contiguous habitats, block seed dispersal routes, or increase vulnerability of wetland species to exotic weed invasion or local extirpation?	N	N
3) Interfere with ongoing maintenance of hydrological conditions in a water or wetland?	N	N
4) Provide an adequate buffer for protecting the functions and values of existing waters or wetlands?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

4C.1) An unnamed creek lies to the east of the project site and O’Leary Creek flows in a southerly direction, approximately 750 feet west of the TRL footprint, towards Santa Clara River, which discharges into the Pacific Ocean. The United States Fish and Wildlife Service (USFWS) National Wetlands Inventory identify a forested/shrub riparian area near the southern boundary of the project site, which was filled and mitigated as part of the Biosolids Facility and Electric Generation Project (USFWS 2017; VRSD 2006). The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted.

With adherence to existing regulations (e.g., SWPPP, Conditions of Approval) during operation of TRL, no impacts to waters or wetlands would occur.

- 4C.2) The proposed project does not involve construction or enlargement of the landfill’s disturbance footprint. All impacts related to wetland or riparian plant communities are mitigated through existing Conditions of Approval that are adhered to by VRSD. No impact would occur.
- 4C.3) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, project-specific and cumulative hydrology impacts will not occur with adherence to existing Conditions of Approval and conformance to existing regulations (e.g., SWPPP).
- 4C.4) The Ventura County General Plan *Goals, Policies and Programs* Policy 1.5.2-4 requires a 100-foot setback buffer from significant wetland habitats. The CUP Modification request will not modify the approved final grades of the landfill. Therefore, no General Plan setback buffer is required and not impact would occur.

Mitigation/Residual Impact(s)

None.

Table 12 Ecological Communities Environmentally Sensitive Habitat Area

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
4D. Ecological Communities ESHA (Applies to Coastal Zone Only)		
Would the proposed project:		
1) Temporarily or permanently remove ESHA or disturb ESHA buffers through construction, grading, clearing, or other activities and uses (ESHA buffers are within 100 feet of the boundary of ESHA as defined in Section 8172.1 of the Coastal Zoning Ordinance)?	N	N
2) Result in indirect impacts from project operation at levels that would degrade the health of an ESHA?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

- 4.D.1) and 4.D.2) The project site is not within the coastal zone and does not contain coastal habitats. Therefore, the proposed project would have no impacts on coastal habitat.

Mitigation/Residual Impact(s)

None.

Table 13 Habitat Connectivity

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
4E. Habitat Connectivity		
Would the proposed project:		
1) Remove habitat within a wildlife movement corridor?	N	N
2) Isolate habitat?	N	N
3) Construct or create barriers that impede fish and/or wildlife movement, migration or long-term connectivity or interfere with wildlife access to foraging habitat, breeding habitat, water source, or other areas necessary for their reproduction?	N	N
4) Intimidate fish or wildlife via the introduction of noise, light, development or increased human presence?	LS	LS

¹N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact

Impact Discussion

4E.1) – 4E.3) Wildlife movement corridors, or habitat linkages and landscape linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging areas, or they may be regional landscape linkages.

There are no significant mapped landscape linkages or wildlife movement corridors on the project site (County of Ventura 2011, South Coast Wildlands 2008). In addition, the proposed project does not propose any construction or expansion of TRL’s disturbance footprint. Therefore, no project-specific and cumulative impacts to wildlife habitat and movement would occur.

4.E.4) Intermittent truck trips would create noise that could intimidate wildlife and cause relocation, but only temporarily as the trucks travel on existing roadways. With adherence to existing Conditions of Approval, project and cumulative impacts to wildlife from lighting would be less than significant.

Mitigation/Residual Impact(s)

Impacts will be less than significant with adherence to existing Conditions of Approval.

Table 14 Consistency with Applicable General Plan Goals and Policies

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
4F. Consistency with Applicable General Plan Goals and Policies		
Would the proposed project:		
1) Would the proposed project be consistent with the applicable General Plan Goals and Policies for Item 4 of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

4F.1) With incorporation of the existing Conditions of Approval, as discussed in this Initial Study, the proposed project will be consistent with the following Ventura County General Plan *Goals, Policies and Programs* related to biological resources (Section 1.5).

Ventura County General Plan Biological Resources Goals and Policies

Goal 1.5.1

Preserve and protect significant biological resources in Ventura County from incompatible land uses and development. Significant biological resources include endangered, threatened or rare species and their habitats, wetland habitats, coastal habitats, wildlife migration corridors and locally important species/communities.

Policy 1.5.2(1) Discretionary development which could potentially impact biological resources shall be evaluated by a qualified biologist to assess impacts and, if necessary, develop mitigation measures.

Policy 1.5.2(3) Discretionary development that is proposed to be located within 300 feet of a marsh, small wash, intermittent lake, intermittent stream, spring, or perennial stream (as identified on the latest USGS 7½ minute quad map), shall be evaluated by a County approved biologist for potential impacts on wetland habitats. Discretionary development that would have a significant impact on significant wetland habitats shall be prohibited, unless mitigation measures are adopted that would reduce the impact to a less than significant level; or for lands designated "Urban" or "Existing Community", a statement of overriding considerations is adopted by the decision-making body.

Policy 1.5.2(4) Discretionary development shall be sited a minimum of 100 feet from significant wetland habitats to mitigate the potential impacts on said habitats. Buffer areas may be increased or decreased upon evaluation and recommendation by a qualified biologist and approval by the decision-making body. Factors to be used in determining adjustment of the 100 foot buffer include soil type, slope stability, drainage patterns, presence or absence of endangered, threatened or rare plants or animals, and compatibility of the proposed development with the wildlife use of the wetland habitat area. The requirement of a buffer (setback) shall not preclude the use of replacement as a mitigation when there is no other feasible alternative to allowing a permitted use, and if the replacement results

in no net loss of wetland habitat. Such replacement shall be "in kind" (i.e. same type and acreage) and provide wetland habitat of comparable biological value. On-site replacement shall be preferred wherever possible. The replacement plan shall be developed in consultation with California Department of Fish and Game.

Policy 1.5.2(5) The California Department of Fish and Game [now referred to as the California Department of Fish and Wildlife], the U.S. Fish and Wildlife Service, National Audubon Society and the California Native Plant Society shall be consulted when discretionary development may affect significant biological resources. The National Park Service shall also be consulted regarding discretionary development within the Santa Monica Mountains or Oak Park Area.

The analysis in Section 4.a through 4.e of this Initial Study is based on biological field reconnaissance prepared by Lawrence E. Hunt, Ph.D. (1995) and ENSR International Corporation (2005), as required under General Plan Policy 1.5.2(3) and General Plan Policy 1.5.2(1). California Department of Fish and Wildlife, USFWS, the California Native Plant Society, and the National Audubon Society have been consulted as part of the review of TRL projects in 1995 and 2006, consistent with General Plan Policy 1.5.2(5). General Plan Policy 1.5.2(4) is not applicable to this project, but has been mitigated in previous projects of the site, including the Biosolids Facility and Electric Generation Project.

Therefore, the proposed project has been evaluated for potential impacts on biological resources, and less than significant impacts would occur.

Mitigation/Residual Impact(s)

None.

Table 15 Agricultural Resources – Soils

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
5A. Agricultural Resources – Soils (AG)²		
Would the proposed project:		
1) Result in the direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique or Local Importance, beyond the threshold amounts set forth in Section 5a.C of the Initial Study Assessment Guidelines?	N	N
2) Involve a General Plan amendment that would result in the loss of agricultural soils?	N	N
3) Be consistent with the applicable General Plan Goals and Policies for Item 5A of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Agricultural Department		

Impact Discussion

- 5A.1) The proposed project includes a non-agricultural use (landfill) in an area which is zoned Open Space. According to the 2016 Important Farmland Inventory Map, the project site soil is designated as urban and built-up land (California Department of Conservation 2017). The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, it would not result in the direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique or Local Importance beyond the threshold amounts set forth in Section 5A.C of the ISAG.
- 5A.2) The proposed project does not involve a General Plan amendment and will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. No impact would occur.
- 5A.3) The proposed project development would be a non-agricultural use in an area which is not zoned agricultural. The site is situated as such that it would not have an effect on any agricultural areas. The proposed project would not remove any land that is currently in agricultural production. In addition, it would not involve a General Plan amendment that would result in the loss of agricultural soils. Therefore, the proposed project would be consistent with the applicable General Plan Goals and Policies for Item 5A of the ISAG. No impact would occur.

Mitigation/Residual Impact(s)

None.

Table 16 Agricultural Resources – Land Use Incompatibility

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
5B. Agricultural Resources – Land Use Incompatibility (AG)²		
Would the proposed project:		
1) If not defined as Agriculture or Agriculture Operations in the zoning ordinances, be closer than the threshold distance set forth in Section 5b.C of the Initial Study Assessment Guidelines?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 5B of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Agricultural Department		

Impact Discussion

- 5B.1) and 5B.2) The ISAG threshold limitation is 300 feet for proposed project non-agricultural structures or uses of any common lot adjacent to off-site classified farmland without vegetative screening. The closest existing TRL structure is located approximately 750 feet northeast of a farmed orchard. In addition, the project would not result in the removal of any land that is currently in agricultural production. Therefore, no impacts on agricultural resources would occur and no land uses incompatible with agriculture would be introduced. The project would

be consistent with the applicable General Plan Goals and Policies for Item 5b of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 17 Scenic Resources

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
6. Scenic Resources (PIng.)²		
Would the proposed project:		
1) Be located within an area that has a scenic resource that is visible from a public viewing location, and physically alter the scenic resource either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects?	LS	LS
2) Be located within an area that has a scenic resource that is visible from a public viewing location, and substantially obstruct, degrade, or obscure the scenic vista, either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects?	LS	LS
3) Be consistent with the applicable General Plan Goals and Policies for Item 6 of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Planning Division		

Impact Discussion

6.1) through 6.3) The proposed project would not physically alter a scenic resource. However, it would continue to be visible from a public viewing location (State Highway 126). The existing landscaping and site topography would partially screen the site from nearby public viewing areas and is adequate to soften the industrial appearance of the existing facility. The existing Conditions of Approval include requirements for continued maintenance of the landscape screening. The project would not change previously approved finished grades or reclamation plans for the landfill. Therefore, impacts on visual resources would be less than significant.

The proposed development would continue to have a less than significant, project specific and cumulative, impact to scenic resources and it would be consistent with the applicable General Plan Goals and Policies for Item 6 of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 18 Paleontological Resources

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
7. Paleontological Resources		
Would the proposed project:		
1) For the area of the property that is disturbed by or during the construction of the proposed project, result in a direct or indirect impact to areas of paleontological significance?	LS	LS
2) Contribute to the progressive loss of exposed rock in Ventura County that can be studied and prospected for fossil remains?	LS	LS
3) Be consistent with the applicable General Plan Goals and Policies for Item 7 of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

- 7.1) – 7.3) TRL is not located in an area known for paleontological importance and would continue operation on a property that has been disturbed by previous development. Existing Conditions of Approval require paleontological monitoring and implementation of a Resource Protection Program. Therefore, the proposed project would have a less than significant impact on paleontological resources. The project is consistent with the applicable General Plan Goals and Policies for Item 7 of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 19 Cultural Resources – Archaeological

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
8A. Cultural Resources - Archaeological		
Would the proposed project:		
1) Demolish or materially alter in an adverse manner those physical characteristics that account for the inclusion of the resource in a local register of historical resources pursuant to Section 5020.1(k) requirements of Section 5024.1(g) of the Public Resources Code?	N	N
2) Demolish or materially alter in an adverse manner those physical characteristics of an archaeological resource that convey its archaeological significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA?	N	N
3) Be consistent with the applicable General Plan Goals and Policies for Item 8A of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

8A.1) – 8A.3) An archaeological study was conducted as part of the 1996 FEIR and included an archival records search, literature review, and pedestrian survey of the expansion project site (VRSD 1996). TRL is currently operating in conformance with all applicable cultural resource Conditions of Approval and the proposed project would not change the approved limits of operation. Therefore, the proposed project would have no impacts on cultural resources and would be consistent with the applicable General Plan Goals and Policies for Item 8A of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 20 Cultural Resources – Historic

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
8B. Cultural Resources – Historic (Plng.)²		
Would the proposed project:		
1) Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources?	N	N
2) Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Act or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code?	N	N
3) Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA?	N	N
4) Demolish, relocate, or alter an historical resource such that the significance of the historical resource will be impaired [Public Resources Code, Sec. 5020(q)]?	N	N

¹N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact

²Planning Division

Impact Discussion

8B.1) – 8B.4) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, no historical resources would be demolished or altered within the project area limits and the proposed project would have no impact on historic resources.

Mitigation/Residual Impact(s)

None.

Table 21 Coastal Beaches and Sand Dunes

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
9. Coastal Beaches and Sand Dunes		
Would the proposed project:		
1) Cause a direct or indirect adverse physical chance to a coastal beach or sand dune, which is consistent with any of the coastal beaches and coastal sand dunes policies of the California Coastal Act, corresponding Coastal Act regulations, Ventura County Coastal Area Plan, or the Ventura County General Plan Goals, Policies and Programs?	N	N
2) When considered together with one or more recently approved, current, and reasonably foreseeable probable future projects, result in a direct or indirect, adverse physical chance to a coastal beach or sand dune?	N	N
3) Will the proposed project be consistent with the applicable General Plan Goals and Policies for Item 9 of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

9.1) – 9.3) The proposed project would not be located near any coastal beaches or sand dunes. Therefore, the proposed development would have no impact, project specific and cumulative, to coastal beaches and sand dunes and would be consistent with the applicable General Plan Goals and Policies for Item 9 of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 22 Fault Rupture Hazard

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
10. Fault Rupture Hazard (PWA)²		
Would the proposed project:		
1) Be at risk with respect to fault rupture in its location within a State of California designated Alquist-Priolo Special Fault Study Zone?	LS	LS
2) Be at risk with respect to fault rupture in its location within a County of Ventura designated Fault Hazard Area?	N	N
3) Be consistent with the applicable General Plan Goals and Policies for Item 10 of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Public Works Agency		

Impact Discussion

10.1) – 10.3) There are no known active or potentially active faults extending through the project site, in accordance with the Alquist-Priolo Earthquake Fault Zoning Act, and Ventura County General Plan Hazards Appendix –Figure 2.2.3b. As shown in Figure 3.2.6 of the 1996 FEIR, the project site is bordered by several faults, including the San Cayetano fault to the north, the Oakridge fault to the south, and the Red Mountain fault to the west. The Culbertson Fault has been mapped on the California Seismic Hazard Zone maps (formerly Alquist-Priolo Special Studies Zone Maps) to the west of Toland. In 1992 and 1996, VRSD had fault studies completed to characterize and evaluate the significance of this fault to Toland. The fault studies included geologic logging of over 9,000 linear feet of trenches, age dating of sediments and interpretation of air photo and seismic data. The fault studies determined that there was no evidence that an active fault crossed the site and that the Culbertson Fault trace likely projects north of Toland (Fugro, 1992 and 1996). No new habitable structures are proposed as a part of this project. Therefore, there would be a less than significant impact from potential fault rupture hazard and no impact in regard to the proposed project’s location in a County designated Fault Hazard Area and consistency with the applicable General Plan Goals and Policies for Item 10 of the ISAG.

There is no known cumulative fault rupture hazard that would occur.

Mitigation/Residual Impact(s)

None.

Table 23 Ground Shaking Hazard

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
11. Ground Shaking Hazard (PWA)²		
Would the proposed project:		
1) Be built in accordance with all applicable requirements of the Ventura County Building Code?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 11 of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Public Works Agency		

Impact Discussion

11.1) and 11.2) TRL, like most of southern California, would be subject to moderate to strong ground shaking from seismic events of local and regional fault systems. VRSD has had multiple geotechnical reports prepared that have evaluated and confirmed the ability of the landfill liners and cover to accommodate for the potential for ground shaking in order to maintain slope stability and landfill integrity. Additionally, no new structures are proposed to be built as a part of the project. Therefore, the effects of ground shaking to less than significant and the proposed project would be consistent with the applicable General Plan Goals and Policies for Item 11 of the ISAG.

The hazards from ground shaking will affect each project individually. No cumulative ground shaking hazard would occur as a result of other projects.

Mitigation/Residual Impact(s)

None.

Table 24 Liquefaction Hazards

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
12. Liquefaction Hazards (PWA)²		
Would the proposed project:		
1) Expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving liquefaction because it is located within a Seismic Hazards Zone?	LS	LS
2) Be consistent with the applicable General Plan Goals and Policies for Item 12 of the Initial Study Assessment Guidelines?	LS	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Public Works Agency		

Impact Discussion

12.1) and 12.2) As discussed in the 1996 FEIR, TRL is not located within a potential liquefaction zone. In addition, based on the Ventura County General Plan Hazards Appendix – Figure 2.4b and the Fillmore Quadrangle Seismic Hazards Zone map TRL is not located in a liquefaction hazard zone (CGS 2002, County of Ventura 2013). The project will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, hazards resulting from liquefaction would be less than significant and the proposed project would be consistent with the applicable General Plan Goals and Policies for Item 12 of the ISAG.

The hazards from liquefaction will affect each project individually. No cumulative liquefaction hazard would occur as a result of other projects.

Mitigation/Residual Impact(s)

None.

Table 25 Seiche and Tsunami Hazards

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
13. Seiche and Tsunami Hazards (PWA)²		
Would the proposed project:		
1) Be located within about 10 to 20 feet of vertical elevation from an enclosed body of water such as a lake or reservoir?	N	N
2) Be located in a mapped area of tsunami hazard as shown on the County General Plan maps?	N	N
3) Be consistent with the applicable General Plan Goals and Policies for Item 13 of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Public Works Agency		

Impact Discussion

13.1) – 13.3) TRL is not located adjacent to a closed or restricted body of water and is not subject to seiche hazards. In addition, TRL is not mapped within a tsunami inundation zone, based on the Ventura County General Plan, Hazards Appendix Figure 2.6 (County of Ventura 2013). The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. As such, the proposed project would have no impact from potential hazards from a tsunami. Therefore, the proposed project would be consistent with the applicable General Plan Goals and Policies for Item 13 of the ISAG.

The hazards from seiche and tsunami will affect each project individually. No cumulative seiche and tsunami hazard would occur as a result of other projects.

Mitigation/Residual Impact(s)

None.

Table 26 Landslide/Mudflow Hazard

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
14. Landslide/Mudflow Hazard (PWA)²		
Would the proposed project:		
1) Result in a landslide/mudflow hazard, as determined by the Public Works Agency Certified Engineering Geologist, based on the location of the site or project within, or outside of the mapped landslides, potential earthquake induced landslide zones, and geomorphology of hillside terrain?	LS	LS
2) Be consistent with the applicable General Plan Goals and Policies for Item 14 of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Public Works Agency		

Impact Discussion

14.1) and 14.2) TRL is located in a mapped landslide and earthquake-induced landslide zone, based on the Seismic Hazard Zones Fillmore Quadrangle map (CGS 2002). As part of the Conditions of Approval, VRSD is required to comply with all geotechnical plans relating to slope stability during slope excavation and have routine (quarterly) slope stability inspections. VRSD is also required to have additional seismic stability inspections within 12 hours of 1) A Richter Magnitude 5.0 or greater earthquake occurring within a 50-kilometer radius of the site; or 2) A Richter Magnitude 6.0 or greater earthquake occurring within a radius of 100 kilometers of the site. VRSD has had multiple geotechnical reports prepared that have evaluated and confirmed the slope stability above the landfill as well as the final landfill cover slopes. Furthermore, the CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, impacts to the TRL resulting from landslide hazards would be less than significant and the proposed project would be consistent with the applicable General Plan Goals and Policies for Item 14 of the ISAG.

No cumulative landslide/mudslide hazard would occur as a result of other projects.

Mitigation/Residual Impact(s)

None.

Table 27 Expansive Soils Hazard

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
15. Expansive Soils Hazard (PWA)²		
Would the proposed project:		
1) Expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving soil expansion because it is located within a soils expansive hazard zone or where soils with an expansion index greater than 20 are present?	LS	LS
2) Be consistent with the applicable General Plan Goals and Policies for Item 15 of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Public Works Agency		

Impact Discussion

15.1) and 15.2) The 1996 FEIR states that expansive soils have been identified at the site but are not considered to cause conditions that cannot be managed through geotechnical engineering (VRSD 1996). In addition, existing Conditions of Approval require verification of the suitability of expansive soils, if used. The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, the propose project would have a less than significant impact from potential hazards from expansive soils and it would be consistent with the applicable General Plan Goals and Policies for Item 15 of the ISAG.

No cumulative expansive soils hazard would occur as a result of other projects.

Mitigation/Residual Impact(s)

None.

Table 28 Subsidence Hazard

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
16. Subsidence Hazard (PWA)²		
Would the proposed project:		
1) Expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving subsidence because it is located within a subsidence hazard zone?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 16 of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Public Works Agency		

Impact Discussion

16.1) and 16.2) TRL is not within the probable subsidence hazard zone, as delineated on the Ventura County General Plan Hazards Appendix Figure 2.8 (County of Ventura 2013). In addition, TRL is not part of oil, gas or groundwater withdrawal. Therefore, no impacts from a subsidence hazard would occur and the project would be consistent with the applicable General Plan Goals and Policies for Item 16 of the ISAG.

No cumulative subsidence hazard would occur as a result of other projects.

Mitigation/Residual Impact(s)

None.

Table 29 Hydraulic Hazards – Non-FEMA

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
17A. Hydraulic Hazards – Non-FEMA (PWA)²		
Would the proposed project:		
1) Result in potential erosion/siltation hazards and flooding hazards pursuant to any of the following documents (individually, collectively, or in combination with one another): <ul style="list-style-type: none"> ▪ 2007 Ventura County Building Code Ordinance No. 4369 ▪ Ventura County Land Development Manual ▪ Ventura County Subdivision Ordinance ▪ Ventura County Coastal Zoning Ordinance ▪ Ventura County Non Coastal Zoning Ordinance ▪ Ventura County Standard Land Development Specifications ▪ Ventura County Road Standards ▪ Ventura County Watershed Protection District Hydrology Manual ▪ County of Ventura Stormwater Quality Ordinance, Ordinance No. 4142 ▪ Ventura County Hillside Erosion Control Ordinance, Ordinance No. 3539 and Ordinance No. 3683 ▪ Ventura County Municipal Storm Water NPDES Permit ▪ State General Construction Permit ▪ State Industrial General Permit 	LS	LS
2) Be consistent with the applicable General Plan Goals and Policies for Item 17A of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Public Works Agency		

Impact Discussion

17A.1) and 17A.2) TRL is required to comply and adhere to all current codes and standards. The August 2017 Drainage Report by A-Mehr Inc. indicates that TRL runoff is collected in paved perimeter channels and discharged to an existing stormwater basin located at the southeast corner of the site, which exceeds the capacity requirements for the 100-year, 24-hour design storm (A-Mehr Inc. 2017). The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, the impacts of the proposed project on Non-Federal Emergency Management Agency (FEMA) Flood Hazards would be less than significant and the project would be consistent with the applicable General Plan Goals and Policies for Item 17a of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 30 Hydraulic Hazards - FEMA

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
17B. Hydraulic Hazards – FEMA (WPD)²		
Would the proposed project:		
1) Be located outside of the boundaries of a Special Flood Hazard Area and entirely within a FEMA-determined 'X-Unshaded' flood zone (beyond the 0.2% annual chance floodplain: beyond the 500-year floodplain)?	LS	LS
2) Be located outside of the boundaries of a Special Flood Hazard Area and entirely within a FEMA-determined 'X-Shaded' flood zone (within the 0.2% annual chance floodplain: within the 500-year floodplain)?	LS	LS
3) Be located, in part or in whole, within the boundaries of a Special Flood Hazard Area (1% annual chance floodplain: 100-Year), but located entirely outside of the boundaries of the Regulatory Floodway?	LS	LS
4) Be located, in part or in whole, within the boundaries of the Regulatory Floodway, as determined using the 'Effective' and latest available DFIRMs provided by FEMA?	LS	LS
5) Be consistent with the applicable General Plan Goals and Policies for Item 17B of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Watershed Protection District		

Impact Discussion

17B.1) – 17B.5) TRL is located outside of the 1 percent annual chance Special Flood Hazard Area. The site is located in a Zone “X”, which is an area determined to be outside the 0.2 percent annual chance floodplain, as depicted in the FEMA digital Flood Insurance Rate Map (#06111C0640E), dated January 20, 2010. The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, potential impacts, project specific and cumulative, from hydrologic hazards would be less than significant and would be consistent with the applicable General Plan Goals and Policies for Item 17b of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 31 Fire Hazards

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
18. Fire Hazards (VCFPD)²		
Would the proposed project:		
1) Be located within High Fire Hazard Areas/Fire Hazard Severity Zones or Hazardous Watershed Fire Areas?	LS	LS
2) Be consistent with the applicable General Plan Goals and Policies for Item 18 of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Ventura County Fire Protection District		

Impact Discussion

18.1) and 18.2) TRL is located within a very high fire hazard area (California Department of Forestry and Fire Protection [CAL FIRE] 2007). However, adherence to existing Conditions of Approval would assure that all structures meet hazardous fire area building code requirements. The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, potential impacts, project specific and cumulative, from fire hazards would be less than significant and the project would be consistent with the applicable General Plan Goals and Policies for Item 18 of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 32 Aviation Hazards

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
19. Aviation Hazards (Airports)²		
Would the proposed project:		
1) Comply with the County’s Airport Comprehensive Land Use Plan and pre-established federal criteria set forth in Federal Aviation Regulation Part 77 (Obstruction Standards)?	N	N
2) Be consistent with applicable General Plan Goals and Policies for Item 19 of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Department of Airports		

Impact Discussion

19.1) and 19.2) TRL is not located within the flight path or runway of any County Airport (County of Ventura 2000). The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, the proposed project would have no impacts related to airport operations and it would be consistent with the applicable General Plan Goals and Policies for Item 19 of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 33 Hazardous Materials/Waste - Materials

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
20A. Hazardous Materials/Waste – Materials (EHD/VCFPD)²		
Would the proposed project:		
1) Utilize hazardous materials in compliance with applicable state and local requirements as set forth in Section 20A of the Initial Study Assessment Guidelines?	LS	LS
2) Be consistent with applicable General Plan Goals and Policies for Item 20A of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Environmental Health Division/Fire Protection District		

Impact Discussion

20A.1) and 20A.2) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. However, continued project operation includes the use of hazardous materials typically associated with industrial businesses. Improper storage, handling, and disposal

of these material(s) could result in the creation of adverse impacts to the environment. Compliance with State and local regulations and applicable Conditions of Approval would reduce potential project-specific and cumulative impacts to a level less than significant and the proposed project would be consistent with the applicable General Plan Goals and Policies for Item 20a of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 34 Hazardous Materials/Waste – Waste

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
20B. Hazardous Materials/Waste – Waste (EHD)²		
Would the proposed project:		
1) Comply with applicable state and local requirements as set forth in Section 20B of the Initial Study Assessment Guidelines?	N	N
2) Be consistent with applicable General Plan Goals and Policies for Item 20B of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Environmental Health Division		

Impact Discussion

20B.1) and 20B.2) TRL does not accept and is not authorized to receive hazardous wastes at the facility. The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, the proposed project would have no impacts, project-specific or cumulative, relative to hazardous wastes and it would be consistent with the applicable General Plan Goals and Policies for Item 20b of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 35 Noise and Vibration

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
21. Noise and Vibration		
Would the proposed project:		
1) Either individually or when combined with other recently approved, pending, and probable future projects, produce noise in excess of the standards for noise in the Ventura County General Plan Goals, Policies and Programs (Section 2.16) or the applicable Area Plan?	PS-M	PS-M
2) Either individually or when combined with other recently approved, pending, and probable future projects, include construction activities involving blasting, pile-driving, vibratory compaction, demolition, and drilling excavation which exceed the threshold criteria provided in the Transit Noise and Vibration Impact Assessment (Section 12.2)?	LS	LS
3) Result in a transit use located within any of the critical distances of the vibration-sensitive uses listed in Table 1 (Initial Study Assessment Guidelines, Section 21)?	LS	LS
4) Generate new heavy vehicle (e.g. semi-truck or bus) trips on uneven roadways located within proximity to sensitive uses that have the potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria of the Transit Use Thresholds for rubber-tire heavy vehicle uses (Initial Study Assessment Guidelines, Section 21-D, Table 1, Item No. 3)?	LS	LS
5) Involve blasting, pile-driving, vibratory compaction, demolition, drilling, excavation, or other similar types of vibration-generating activities which have the potential to either individually or when combined with other recently approved, pending, and probably future projects, exceed the threshold criterial provided in the Transit Noise and Vibration Impact Assessment [Hansen, Carl E., David A. Towers, and Lance D. Meister. (May 2006) Section 12.2)?	N	N
6) Be consistent with the applicable General Plan Goals and Policies for Item 21 of the Initial Study Assessment Guidelines?	PS-M	PS-M
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

21.1) through 21.6) The proposed project does not involve construction or expansion of the landfill’s disturbance footprint. Therefore, no construction-related noise would occur.

As indicated in the 1996 FEIR, project-related waste truck noise along Toland Road would impact two residences along this road (located approximately 360 feet and 65 feet from the centerline of Toland Road). Compliance with existing mitigation measures outlined in the 1996 FEIR and conditions approval have reduced operational noise impacts to a less than significant

level. The 92 existing average daily trips to the landfill combined with the potential 60 additional trips would total 152 heavy vehicle trips. This total is equivalent to the maximum limit of heavy vehicle trips considered in the 1996 FEIR noise impact analysis. Although the 1996 FEIR determined the project-specific traffic impacts were not significant and the proposed change would be within the analysis envelope considered in the 1996 FEIR, the potential noise impacts associated with the additional heavy vehicle traffic will be studied further in the Supplemental EIR.

Table 36 Daytime Glare

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
22. Daytime Glare		
Would the proposed project:		
1) Create a new source of disability glare or discomfort glare for motorists traveling along any road of the County Regional Road Network?	N	N
2) Be consistent with applicable General Plan Goals and Policies for Item 22 of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

22.1) and 22.2) The project does not propose any additional structures or sources of glare. Existing Conditions of Approval reduce the potential impacts of daytime glare on motorists traveling on State Highway 126 to a less than significant level. The project would be consistent with the applicable General Plan Goals and Policies for Item 22 of the Initial Study Assessment Guidelines. No impact would occur.

Mitigation/Residual Impact(s)

None.

Table 37 Air Quality

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
23. Public Health (EHD)²		
Would the proposed project:		
1) Result in impacts to public health from environmental factors as set forth in Section 23 of the Initial Study Assessment Guidelines?	LS	LS
2) Be consistent with applicable General Plan Goals and Policies for Item 23 of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Environmental Health Division		

Impact Discussion

23.1) and 23.2) The proposed project may have impacts to public health from storage of hazardous materials/waste used on-site (e.g., cleaning supplies). Compliance with applicable State and local regulations and Conditions of Approval enforced by the Environmental Health Division would reduce potential project-specific and cumulative impacts to less than significant. Therefore, the proposed project would be consistent with the applicable General Plan Goals and Policies for Item 23 of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 38 Greenhouse Gases

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
24. Greenhouse Gases (APCD)²		
Would the proposed project:		
1) Would the proposed project result in environmental impacts from greenhouse gas emissions, either project specifically or cumulatively, as set forth in CEQA Guidelines §§ 15064(h)(3), 15064.4, 15130(b)(1)(B), 15130(d), and 15183.5?	LS	LS

¹N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact

²Ventura County Air Pollution Control District

Impact Discussion

24.1) The project’s greenhouse gas impacts were not considered as part of the 1996 FEIR. Although, the CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted, the potential greenhouse gas impacts associated with TRL receiving additional waste per day will be studied further in a Supplemental EIR.

Mitigation/Residual Impact(s)

None.

Table 39 Community Character

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
25. Community Character (PIng.)²		
Would the proposed project:		
1) Either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects, introduce physical development that is incompatible with existing land uses, architectural form or style, site design/layout, or density/parcel sizes within the community in which the project site is located?	N	N
2) Be consistent with applicable General Plan Goals and Policies for Item 25 of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Planning Department		

Impact Discussion

25.1) and 25.2) The project site is designated as "Open Space" in the Ventura County General Plan. The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, no impacts on community character would occur. The project would be consistent with the applicable General Plan Goals and Policies for Item 25 of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 40 Housing

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
26. Housing (PIng.)²		
Would the proposed project:		
1) Eliminate three or more dwelling units that are affordable to: <ul style="list-style-type: none"> ▪ Moderate-income households that are located within the Coastal Zone; and/or, existing dwelling units? ▪ Lower-income households? 	N	N
2) Involve construction which has an impact on the demand for additional housing due to potential housing demand created by construction workers?	N	N
3) Result in 30 or more new full-time-equivalent lower-income employees?	N	N
4) Be consistent with the applicable General Plan Goals and Policies for Item 26 of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Planning Department		

Impact Discussion

- 26.1) The project is not located in the Coastal Zone and does not include the elimination of any existing dwellings. Therefore, the proposed project would have no project-specific and cumulative impacts on housing.
- 26.2) Any project that involves construction has an impact on the demand for additional housing due to potential housing demand created by construction workers. However, the project includes no new construction. Therefore, the proposed project would have no project-specific and cumulative impacts on housing.
- 26.3) and 26.4) The project will not create a demand for new housing as it is too speculative at this time to say that this proposed project will or will not add employees. Therefore, the proposed project would have no project-specific and cumulative impacts on housing. Based on the discussion above, the proposed project would be consistent with the General Plan Goals and Policies that pertain to item 26 of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 41 Transportation & Circulation – Roads and Highways – Level of Service (LOS)

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
27.A (1) Transportation & Circulation – Roads and Highways – Level of Service (LOS) (PWA)²		
Would the proposed project:		
1) Would the proposed project cause existing roads within the Regional Road Network or Local Road Network that are currently functioning at an acceptable LOS to function below an acceptable LOS?	PS-M	PS-M
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Public Works Agency		

Impact Discussion

- 27.A (1) A traffic study was completed in 1995 by WPA Traffic Engineering, Inc. for the 1996 FEIR. The study determined that the existing intersection of Toland Road and State Highway 126 level of service (LOS) ranged from “A” to “F”. Table 42 summarizes the analysis findings.

Table 42 Intersection Analyses for 1996 FEIR Existing Conditions⁽¹⁾ of Toland Road and State Highway 126 Intersection Level of Service (LOS)

Movement	Level of Service (LOS)
AM Peak Hour	
SB Left	* ⁽²⁾
SB Right	A
EB Left	B
Early PM Peak Hour	
SB Left	E
SB Right	A
EB Left	B
PM Peak Hour	
SB Left	F
SB Right	* ⁽²⁾
EB Left	* ⁽²⁾

(1) Based on 1994 highway capacity manual methodology for unsignalized intersections

(2) * indicates the turning volume counted was zero and therefore no LOS value was calculated

SB = Southbound; EB = Eastbound

Source: VRSD 1996

Although the 1996 FEIR determined that the project-specific traffic impacts were not significant, the project proposes to add up to 60 additional heavy vehicle trips to State Highway 126 and Toland Road compared to existing conditions. Therefore, the potential impacts associated with the additional heavy vehicle traffic will be studied further in a Supplemental EIR.

Mitigation/Residual Impact(s)

None.

Table 43 Transportation & Circulation – Roads and Highways – Safety and Design of Public Roads

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
27.A (2) Transportation & Circulation - Roads and Highways - Safety and Design of Public Roads (PWA)²		
Would the proposed project:		
1) Does the existing Public Road or intersection comply with current County Road Standards, and would the proposed Public Road or intersection improvement or encroachment associated with the project or required by the CEQA lead agency also comply with County Road Standards?	PS-M	PS-M
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Public Works Agency		

Impact Discussion

27.A (2) Although the 1996 FEIR determined that the project-specific traffic and roadway impacts were not significant, the project proposes to add up to 60 additional heavy vehicle trips to State Highway 126 and Toland Road compared to existing conditions. Therefore, the potential impacts associated with the additional heavy vehicle traffic will be studied further in a Supplemental EIR.

Mitigation/Residual Impact(s)

None.

Table 44 Transportation & Circulation – Roads and Highways – Safety and Design of Private Access

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
27.A (3). Transportation & Circulation – Roads and Highways – Safety and Design of Private Access (VCFPD)²		
Would the proposed project:		
1) If a private road or private access is proposed, will the design of the private road meet the adopted Private Road Guidelines and access standards of the VCFPD as listed in the Initial Study Assessment Guidelines?	N	N
2) Will the proposed project be consistent with the applicable General Plan Goals and Policies for Item 27.A (3) of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Ventura County Fire Protection District		

Impact Discussion

27.A (3).1) and 27.A (3).2) The proposed project would not require the development of private roads. Therefore, the proposed project would have no impacts, project-specific and cumulative, related to safety and design of private roads and would meet the Goals and Policies of the General Plan guidelines. Therefore, the proposed project would be consistent with the General Plan Goals and Policies that pertain to item 27.A (3) of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 45 Transportation & Circulation – Roads and Highways – Tactical Access

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
27.A (4). Transportation & Circulation – Roads and Highways – Tactical Access (VCFPD)²		
Would the proposed project:		
1) Involve a road or access, public or private, that complies with VCFPD adopted Private Road Guidelines?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 27.A (4) of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

27.A (4).1) and 27.A (4).2) All existing roads and access meet Ventura County Fire Protection District (VCFPD) standards. Therefore, the proposed project would have no impacts, project-specific and cumulative, related to tactical access and it would meet the goals and policies of the general plan guidelines. Therefore, the proposed project would be consistent with the General Plan Goals and Policies that pertain to item 27.A (4) of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 46 Transportation & Circulation – Pedestrian/Bicycle Facilities

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
27.B Transportation & Circulation – Pedestrian/Bicycle Facilities (PWA/Plng.)²		
Would the proposed project:		
1) Cause actual or potential barriers to existing or planned pedestrian/bicycle facilities?	N	N
2) Generate or attract pedestrian/bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities?	N	N
3) Be consistent with the applicable General Plan Goals and Policies for Item 27.B of the Initial Study Assessment Guidelines?	N	N

¹N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact
²Public Works Agency/Planning Department

Impact Discussion

27.B.1) – 27.B.3) The proposed project will not generate additional pedestrian and bicycle traffic. The project is in a rural area between the cities of Santa Paula and Fillmore. Most, if not all, employees and customers travel to the site by an automobile or truck. Furthermore, the proposed project would not change operational or staff levels, and only minimal traffic level changes would occur. Therefore, no impacts on pedestrians and bicycle facilities in the area would occur and the proposed project would be consistent with the General Plan Goals and Policies that pertain to item 27.B of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 47 Transportation & Circulation – Bus Transit

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
27.C Transportation & Circulation – Bus Transit		
Would the proposed project:		
1) Substantially interfere with existing bus transit facilities or routes, or create a substantial increased demand for additional or new bus transit facilities/services?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 27.C of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

27.C.1) and 27.C.2) The project site is not located near any bus transit facilities. In addition, the project would not generate new demand for bus transit, as the project would not expand the number of on-site employees. Therefore, the proposed project would not have project-specific or cumulative impacts related to bus transit and it would be consistent with the General Plan Goals and Policies that pertain to item 27.C in the ISAG.

Mitigation/Residual Impact(s)

None.

Table 48 Transportation & Circulation – Railroads

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
27.D Transportation & Circulation – Railroads		
Would the proposed project:		
1) Individually or cumulatively, substantially interfere with an existing railroad's facilities or operations?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 27.D of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

27.D.1) and 27.D.2) The project site is not located within one half-mile of any railroad. Railroad operations would not be affected by the proposed project, as all activity associated with it would be contained within the boundary of the project site. Therefore, it would not have any project-specific or cumulative impacts to railroads and it would be consistent with the General Plan Goals and Policies that pertain to item 27.D in the ISAG.

Mitigation/Residual Impact(s)

None.

Table 49 Transportation & Circulation – Airports

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
27.E Transportation & Circulation – Airports (Airports)²		
Would the proposed project:		
1) Have the potential to generate complaints and concerns regarding interference with airports?	N	N
2) Be located within the sphere of influence of either County operated airport?	N	N
3) Be consistent with the applicable General Plan Goals and Policies for Item 27.E of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Department of Airports		

Impact Discussion

27E.1) – 27.E.3) Since the nearest airport is located more than two miles from the project site, the project would not be located within the sphere of influence of any County operated airport. Thus, airport operations would not be affected by the proposed project. All activity associated with the project would be contained within the boundary of the project site. In addition, no additional structures are proposed as part of the project. Therefore, it would not have any project-specific or cumulative impacts to airports and it would be consistent with the General Plan Goals and Policies that pertain to item 27.E of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 50 Transportation & Circulation – Harbor Facilities

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
27.F Transportation & Circulation – Harbor Facilities (Harbor)²		
Would the proposed project:		
1) Involve construction or an operation that will increase the demand for commercial boat traffic and/or adjacent commercial boat facilities?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 27.F of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Harbor Department		

Impact Discussion

27F.1) and 27.F.2) The proposed project development would not be located adjacent to any harbor, would not affect the operations of a harbor, and would not increase the demands on harbor facilities. Therefore, it would not have any project-specific or cumulative impacts related to harbors and it would be consistent with the applicable General Plan Goals and Policies for Item 27f of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 51 Transportation & Circulation – Pipelines

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
27.G Transportation & Circulation – Pipelines		
Would the proposed project:		
1) Substantially interfere with, or compromise the integrity or affect the operation of, an existing pipeline?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 27.G of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

27G.1) and 27G.2) No existing pipelines are located under or adjacent to the subject property, and the project will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, the proposed project would not substantially interfere with, or compromise the integrity or affect the operation of any existing pipelines. Therefore, the proposed project would have no impacts, project-specific and cumulative, on petroleum resources, and it would be consistent with the applicable General Plan Goals and Policies for Item 27g of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 52 Water Supply – Quality

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
28.A Water Supply – Quality (EHD)²		
Would the proposed project:		
1) Comply with applicable state and local requirements as set forth in Section 28.A of the Initial Study Assessment Guidelines?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 28.A of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Environmental Health Division		

Impact Discussion

28A.1) and 28.A.2) The project will not modify the approved final grades of the landfill, equipment used on site, or the type of waste accepted. The shared water well (individual water supply system) will continue to provide water for TRL. The quality of water complies with applicable State drinking water standards. The proposed project would not have any project-specific or cumulative impacts to the quality of water supplied by the individual water system and it would be consistent with the General Plan Goals and Policies for Item 28.A of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 53 Water Supply – Quantity

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
28.B Water Supply – Quantity (WPD)²		
Would the proposed project:		
1) Have a permanent supply of water?	LS	LS
2) Either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probably future projects, introduce physical development that would adversely affect the water supply – quantity of the hydrologic unit in which the project site is located?	LS	LS
3) Be consistent with the applicable General Plan Goals and Policies for Item 28.B of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Watershed Protection District		

Impact Discussion

28.B.1) – 28.B.3) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, the proposed project would not individually or cumulatively, when combined with recently approved, current, and reasonably foreseeable probable future projects, introduce physical development that would adversely affect the water supply. Therefore, the proposed development would have a less than significant impact on the available water supply. The project would be consistent with the applicable General Plan Goals and Policies for Item 28b of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 54 Water Supply – Fire Flow Requirements

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
28.C Water Supply – Fire Flow Requirements (VCFPD)²		
Would the proposed project:		
1) Meet the required fire flow?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 28.C of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Ventura County Fire Protection District		

Impact Discussion

28.C.1) and 28.C.2) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Current water supply is provided by a shared water well and water tanks that meet VCFPD requirements. Therefore, the proposed project would not have any project-specific or cumulative impacts on water supply for fire flow and it would be consistent with the applicable General Plan Goals and Policies for Item 28C of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 55 Waste Treatment & Disposal Facilities – Individual Sewage Disposal Systems

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
29.A Waste Treatment & Disposal Facilities – Individual Sewage Disposal Systems (EHD)²		
Would the proposed project:		
1) Comply with applicable state and local requirements as set forth in Section 29.A of the Initial Study Assessment Guidelines?	LS	LS
2) Be consistent with the applicable General Plan Goals and Policies for Item 29.A of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Environmental Health Division		

Impact Discussion

29.A.1) and 29.A.2) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. An individual sewage disposal system will continue to be utilized for sewage disposal. Therefore, the proposed project would not have any project-specific or cumulative impacts relative to on-site sewage disposal and it would be consistent with the applicable General Plan Goals and Policies for Item 29a of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 56 Waste Treatment & Disposal Facilities – Sewage Collection/Treatment Facilities

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
29.B Waste Treatment & Disposal Facilities – Sewage Collection/Treatment Facilities (EHD)²		
Would the proposed project:		
1) Comply with applicable state and local requirements as set forth in Section 29.B of the Initial Study Assessment Guidelines?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 29.B of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Environmental Health Division		

Impact Discussion

29.B.1) and 29.B.2) The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. The proposed project would continue to be connected to a private septic system. Therefore, the proposed project would not have any project-specific or cumulative impacts on the sewage collection system and it would be consistent with the applicable General Plan Goals and Policies for Item 29b of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 57 Waste Treatment & Disposal Facilities – Solid Waste Management

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
29.C Waste Treatment & Disposal Facilities – Solid Waste Management (PWA)²		
Would the proposed project:		
1) Have a direct or indirect adverse effect on a landfill such that the project impairs the landfill's disposal capacity in terms of reducing its useful life to less than 15 years?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 29.C of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Public Works Agency		

Impact Discussion

29.C.1) The proposed project would utilize the remaining MSW disposal capacity of TRL by allowing greater daily tons of MSW to be delivered and disposed of at the landfill. By removing artificial limits on daily and lifetime totals of MSW at TRL in the existing CUP, TRL will be in a better position to service the MSW disposal needs of the Western Ventura County watershed. Impacts would be beneficial to landfill disposal capacity.

29.C.2) The proposed project does not propose any construction or demolition. Therefore, the proposed project would have less than significant project-specific impacts and would be consistent with the General Plan Goals and Policies for Item 29C of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 58 Waste Treatment & Disposal Facilities – Solid Waste Facilities

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
29.D Waste Treatment & Disposal Facilities – Solid Waste Facilities (EHD)²		
Would the proposed project:		
1) Comply with applicable state and local requirements as set forth in Section 29D of the Initial Study Assessment Guidelines?	LS	LS
2) Be consistent with the applicable General Plan Goals and Policies for Item 29.D of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Environmental Health Division		

Impact Discussion

29D.1) and 29D.2) The proposed project would better utilize the remaining MSW capacity of TRL. TRL is currently subject to, and in compliance with, State regulations enforced by Ventura County Environmental Health Division/Local Enforcement Agency. Therefore, the proposed project would not have any project-specific or cumulative impacts relating to solid waste facilities and it would be consistent with the General Plan Goals and Policies for Item 29d of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 59 Utilities

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
30. Utilities		
Would the proposed project:		
1) Individually or cumulatively cause a disruption or re-routing of an existing utility facility?	N	N
2) Individually or cumulatively increase demand on a utility that results in expansion of an existing utility facility which has the potential for secondary environmental impacts?	N	N
3) Be consistent with the applicable General Plan Goals and Policies for Item 30 of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

30.1) – 30.3) The project site is located in an area in which electrical and telephone services are available. The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, no facility would need to be re-routed or expanded to serve the proposed project and demand would not increase. The proposed project would have no impact, project specific or cumulative, to utilities and would be consistent with the General Plan Goals and Policies Item 30 of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 60 Flood Control Facilities/Watercourses – Watershed Protection District

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
31.A Flood Control Facilities/Watercourses – Watershed Protection District (WPD)²		
Would the proposed project:		
1) Either directly or indirectly, impact flood control facilities and watercourses by obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water, resulting in exposing adjacent property and the community to increased risk for flood hazards?	LS	LS
2) Be consistent with the applicable General Plan Goals and Policies for Item 31.A of the Initial Study Assessment Guidelines?	LS	LS
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Watershed Protection District		

Impact Discussion

31.A.1) and 31.A.2) The proposed project would not expand impervious areas within the TRL. According to the 2017 Drainage Study, on-site drainage is collected in paved perimeter channels and discharged to the stormwater retention or terminal basin, located at the southeast corner of the site. Stormwater collected in the terminal basin is discharged primarily by retention, and removal of sediments occurs before discharging to O’Leary Creek. Discharge is controlled by an emergency spillway, which permits overflow in the event of a major storm when the storage capacity of the basin, approximately 22.53 acre-feet, is exceeded (A-Mehr Inc. 2017). This basin has been constructed in conformance with the California Code of Regulations Title 23, which implements the California Porter-Cologne Water Quality Act. These regulations establish the requirements for disposal and/or management of various types of wastes, including the protection of surface and groundwater. This basin conforms to requirements of the Ventura County Flood Control Department and TRL complies with the Los Angeles RWQCB Order R4-2018-0058 by implementing IGP best management practices, including the aforementioned drainage basin (a structural best management facility) and other implemented best

management practices, including routine sweeping, watering roads, maintaining the detention basins in good condition, use of covers overnight over the active portions of the landfill, and other measures specified in the 2017 Joint Technical Document on-file with the County of Ventura. These practices are also consistent with Ventura County General Plan goals 2.10.1-2, 4.6.1 and policies 4.6.2-1 and 4.6.2-2. Therefore, the proposed project would have less than significant impacts, project specific and cumulative, on drainage channels under the jurisdiction of the Watershed Protection District and it would be consistent with the General Plan Goals and Policies Item 31a of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 61 Flood Control Facilities/Watercourses – Other Facilities

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
31.B Flood Control Facilities/Watercourses – Other Facilities (PWA)²		
Would the proposed project:		
1) Result in the possibility of deposition of sediment and debris materials within existing channels and allied obstruction of flow?	LS	LS
2) Impact the capacity of the channel and the potential for overflow during design storm conditions?	LS	LS
3) Result in the potential for increased runoff and the effects on Areas of Special Flood Hazard and regulatory channels both on and off site?	LS	LS
4) Involve an increase in flow to and from natural and man-made drainage channels and facilities?	LS	LS
5) Be consistent with the applicable General Plan Goals and Policies for Item 31B of the Initial Study Assessment Guidelines?	LS	LS

¹N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact

²Public Works Agency

Impact Discussion

31.B.1) – 31.B.5) Runoff from TRL flows to an on-site basin that is able to capture runoff of 100-year and 24-hour storms (A-Mehr Inc. 2017). The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, the proposed project would have a less than significant impact, project specific and cumulative, on drainage facilities not operated by the Ventura County Watershed Protection District and the project would be consistent with the applicable General Plan Goals and Policies for Item 31b of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 62 Law Enforcement/Emergency Services

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
32. Law Enforcement/Emergency Services (Sheriff)²		
Would the proposed project:		
1) Have the potential to increase demand for law enforcement or emergency services?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 32 of the Initial Study Assessment Guidelines?	N	N

¹N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact
²Sheriff's Department

Impact Discussion

32.1) and 32.2) TRL has adequate security measures which include: a fence on a portion of the southern, western and eastern boundary of the site. A fence and/or topographic features (i.e., hills, mountains ranges, etc.) that limit access to the landfill around the remainder of the site also prevent unauthorized access. The gate at the main entrance of the landfill is locked and access is restricted when the site is closed. The gate is controlled by site personnel during hours of operation. All on-site maintenance, operations, and storage facilities are locked at the close of operations each day and access is restricted to site personnel only. All hazardous materials and hazardous waste storage areas are located within the fenced area of the site and are identified and locked.

The project is not in a category of uses that would have the potential to increase demand for law enforcement or emergency personnel. In addition, the proposed project does not propose new structures on site. The proposed project would not interfere with any law enforcement facility and would not include any new uses or generate an increase in population that would result in an increased demand for law enforcement facilities. Therefore, the proposed project would have no impact, project specific or cumulative, to law enforcement/emergency services. In addition, it would be consistent with the applicable General Plan Goals and Policies for Item 32 of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 63 Fire Protection Services – Distance and Response

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
33.A Fire Protection Services – Distance and Response (VCFPD)²		
Would the proposed project:		
1) Be located in excess of five miles, measured from the apron of the fire station to the structure or pad of the proposed structure, from a full-time paid fire department?	N	N
2) Require additional fire stations and personnel, given the estimated response time from the nearest full-time paid fire department to the project site?	N	N
3) Be consistent with the applicable General Plan Goals and Policies for Item 33A of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Ventura County Fire Protection District		

Impact Discussion

33A.1) and 33.A.2) The project site is within five miles of the nearest fire station (Ventura County Fire Protection District [VCFPD] and the Sespe Fire Station). No additional personnel or development is proposed as part of the project. Therefore, no additional fire station personnel or equipment will be required. Therefore, the proposed project will not have any project-specific or cumulative impacts relating to fire protection services, distance and response and it would be consistent with the applicable General Plan Goals and Policies for Item 33a of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 64 Fire Protection Services – Personnel, Equipment, and Facilities

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
33B. Fire Protection Services – Personnel, Equipment, and Facilities (VCFPD)²		
Would the proposed project:		
1) Result in the need for additional personnel?	N	N
2) Magnitude or the distance from existing facilities indicate that a new facility or additional equipment will be required?	N	N
3) Be consistent with the applicable General Plan Goals and Policies for Item 33B of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² Ventura County Fire Protection District		

Impact Discussion

33B.1) – 33B.3) No additional personnel and no new facilities or equipment would be required for this project. Therefore, the proposed project would not have any project-specific or cumulative impacts relating to fire protection services, distance and response and it would be consistent with the applicable General Plan Goals and Policies for Item 33B of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 65 Education – Schools

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
34A. Education - Schools		
Would the proposed project:		
1) Substantially interfere with the operations of an existing school facility?	N	N
2) Be consistent with the applicable General Plan Goals and Policies for Item 34A of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		

Impact Discussion

34A.1) and 34.A.2) The proposed project does not involve a residential use and may not generate new employment opportunities that would result in an increase in population and a corresponding increase in demand for schools. Furthermore, the proposed project is not located adjacent to any school facilities and it would not have any impact on school facilities or operations. Therefore, there would be no impacts to existing school facilities and it would be consistent with the applicable General Plan Goals and Policies for Item 34A of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 66 Education – Public Libraries

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
34B. Education – Public Libraries (Lib. Agency)²		
Would the proposed project:		
1) Substantially interfere with the operations of an existing public library facility?	N	N
2) Put additional demands on a public library facility which is currently deemed overcrowded?	N	N
3) Limit the ability of individuals to access public library facilities by private vehicle or alternative transportation modes?	N	N
4) In combination with other approved projects in its vicinity, cause a public library facility to become overcrowded?	N	N
5) Be consistent with the applicable General Plan Goals and Policies for Item 34B of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact ² Library Services Agency		

Impact Discussion

34B.1) – 34B.5) The proposed project would not involve a residential use that would result in an increase in population or a corresponding increase in demand for libraries. Furthermore, the proposed project would be not located adjacent to any public library facilities and it would not have any impact on public library facilities or operations. Therefore, it would have no impacts, project specific or cumulative, on public library facilities or services and it would be consistent with the applicable General Plan Goals and Policies for Item 34b of the ISAG.

Mitigation/Residual Impact(s)

None.

Table 67 Recreational Facilities

Issue (Responsible Department)	Project Impact Degree of Effect ¹	Cumulative Impact Degree of Effect ¹
35. Recreation Facilities (GSA)²		
Would the proposed project:		
1) Cause an increase in the demand for recreation, parks, and/or trails and corridors?	N	N
2) Cause a decrease in recreation, parks, and/or trails or corridors when measured against the following standards: <ul style="list-style-type: none"> ▪ Local Parks/Facilities - 5 acres of developable land (less than 15% slope) per 1,000 population; ▪ Regional Parks/Facilities - 5 acres of developable land per 1,000 population; or, ▪ Regional Trails/Corridors - 2.5 miles per 1,000 population 	N	N
3) Impede future development of Recreation Parks/Facilities and/or Regional Trails/Corridors?	N	N
4) Be consistent with the applicable General Plan Goals and Policies for Item 35 of the Initial Study Assessment Guidelines?	N	N
¹ N = No Impact; LS = Less than Significant Impact; PS-M = Potentially Significant but Mitigable Impact		
² General Services Agency		

Impact Discussion

35.1) – 35.4) The proposed project would not be located within existing designated local park land, or within the vicinity of any local or regional facilities. The proposed project would not involve a residential use that would result in an increase in population and a corresponding increase in demand for new parks and recreational facilities. Therefore, it would not have an impact on local or regional parks and recreational facilities and it would be consistent with the applicable General Plan Goals and Policies for Item 35 of the ISAG.

Mitigation/Residual Impact(s)

None.

2.4 Topics Not Covered by ISAG Guidelines

2.4.1 Tribal Cultural Resources

Table 68 Tribal Cultural Resources

State CEQA Guidelines – Appendix G				
	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p>				
<p>a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Although not included in the County ISAG, a discussion of tribal cultural resources is included in this Initial Study pursuant to the State CEQA Guidelines.

VRSD has not received any written requests from any California Native American tribe requesting formal notification and/or consultation under AB 52 regarding projects subject to CEQA in their traditionally or culturally affiliated geographic area (Public Resources Code Section 21080.3.1[b][1]).

Furthermore, VRSD is not aware of any tribal cultural resources within, or in the vicinity of, the TRL site. Lastly, the proposed CUP modification project does not include any earth movement or ground disturbance. Therefore, there will be no project-related impacts to tribal cultural resources, even if any are present, as a result of the proposed project.

2.4.2 Energy

Table 69 Energy

State CEQA Guidelines – Appendix G				
	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Although not included in the County ISAG, a discussion of energy is included in this Initial Study pursuant to the State CEQA Guidelines.

Background

California is one of the lowest per capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate (United States Energy Information Administration [EIA] 2018). The single largest end-use sector for energy consumption in California is transportation (39.8 percent), followed by industry (23.7 percent), commercial (18.9 percent), and residential (17.7 percent) (EIA 2018).

Most of California’s electricity is generated in-state with approximately 30 percent imported from the Northwest and Southwest in 2017. In addition, approximately 30 percent of California’s electricity supply comes from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (CEC 2018a). Adopted on September 10, 2018, SB 100 accelerates the State’s Renewables Portfolio Standards Program by requiring electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

To reduce statewide vehicle emissions, California requires that all motorists use California Reformulated Gasoline, which is sourced almost exclusively from in-state refineries. Gasoline is the most used transportation fuel in California with 15.5 billion gallons sold in 2017 and is used by light-duty cars, pickup trucks, and sport utility vehicles (California Department of Tax and Fee Administration 2018). Diesel is the second most used fuel in California with 4.2 billion gallons sold in 2015 and is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles (CEC 2016).

Electricity and Natural Gas

In 2017, California used 292,039 gigawatt-hours (GWh) of electricity, of which 29 percent were from renewable resources (CEC 2018a; CEC 2017a). California also consumed approximately 12,500 million U.S. therms (MMthm) of natural gas in 2017 (CEC 2017b). The project site would be provided electricity by Southern California Edison (SCE) and natural gas by Southern California Gas Company (SCG). Table 70 and Table 71 show the electricity and natural gas consumption by sector and total for SCE and SCG. In 2017, SCE provided approximately 28.9 percent of the total electricity used in California. Also in 2017, SCG provided approximately 41.1 percent of the total natural gas usage in California.

Table 70 Electricity Consumption in the SCE Service Area in 2017

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Streetlight	Total Usage
2,975.4	31,925.3	4,283.3	13,094	2,410.6	28,975.0	627.9	84,291.6

Notes: All usage expressed in GWh
 Source: CEC 2017a

Table 71 Natural Gas Consumption in SCG Service Area in 2017

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Total Usage
69.4	895.9	72.1	1,716.6	229.7	2,158.1	5,141.8

Notes: All usage expressed in MMThm
 Source: CEC 2017b

Petroleum

In 2016, approximately 40 percent of the state’s energy consumption was used for transportation activities (EIA 2018). Californians presently consume over 19 billion gallons of motor vehicle fuels per year (CEC 2018b). Though California’s population and economy are expected to grow, gasoline demand is projected to decline from roughly 15.8 billion gallons in 2017 to between 12.3 billion and 12.7 billion gallons in 2030, a 20 percent to 22 percent reduction. This decline comes in response to both increasing use and availability of electric vehicles and higher fuel economy for new gasoline vehicles (CEC 2018b).

Impact Discussion

- a. As described in Section 1, *Project Description*, the project would not involve any physical improvements to TRL and, therefore, would not result in any construction-related energy consumption. Furthermore, the project proposes no changes to the equipment used on site or the type of waste accepted and, therefore, energy consumption associated with these elements of TRL operation would not change.

The project would remove the maximum daily permitted capacity of 1,500 tpd and replace it with a maximum of 152 heavy truckloads of waste per day. Additionally, the project would eliminate the 15 million-ton lifetime capacity of TRL. Due to the proposed changes in daily and

lifetime capacity, the project would result in an increase in the number of trucks accessing TRL daily, resulting in greater fuel consumption associated with waste hauling to the facility.

Waste that would be accepted by TRL under the project is already being generated in the Western Ventura County watershed. Currently, this waste is being delivered to other landfills further from the source of its generation, such as the Simi Valley Landfill. While the project would increase the amount of waste accepted at TRL and number of trips accessing the facility, it would have no effect on waste generation rates and, therefore, would not affect overall energy demand associated with municipal solid waste processing and storage in the Western Ventura County watershed. Furthermore, one of the project objectives is to maximize in-county waste disposal capacity at TRL to minimize travel distances and related air pollutant and GHG emissions for waste hauling vehicles. For example, delivery to TRL instead of the Simi Valley Landfill for waste generated in Oxnard and Ventura would result in a one-way trip reduction of at least 4 and 11 vehicle miles traveled (VMT), respectively. This reduction in VMT would be directly correlated to a reduction in energy demand, specifically fuel consumption, associated with waste hauling activities in the watershed.

The project would increase the daily and lifetime capacity of TRL but would have no effect on waste generation and would reduce VMT associated with waste hauling. Because the project would result in a net reduction of overall energy consumption associated with waste hauling activities in the watershed, the project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. No adverse impact would occur.

- b. As mentioned above, SB 100 mandates 100 percent clean electricity for California by 2045. The project does not involve construction of new or expansion of existing facilities that would increase operational electricity demand at TRL. Existing facilities used to process additional waste delivered to TRL would be powered by the existing electricity grid, and therefore would eventually be powered by renewable energy mandated by SB 100 and would not conflict with this statewide plan. VRSD has not adopted specific renewable energy or energy efficiency plans with which the project could comply. Furthermore, the project would result in a net reduction in energy consumption in the watershed due to the reduction in VMT associated with waste hauling activities. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No adverse impact would occur.

Mitigation/Residual Impact(s)

None.

2.4.3 Wildfire

Table 72 Wildfire

State CEQA Guidelines – Appendix G				
	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Although not included in the County ISAG, a discussion of wildfire is included in this Initial Study pursuant to the State CEQA Guidelines.

TRL is located within a Very High Fire Hazard area and a State Responsibility Area (CAL FIRE 2007). However, adherence to existing Conditions of Approval would require existing structures meet hazardous fire area building code requirements. The CUP Modification request will not modify the approved final grades of the landfill, equipment used on site, nor the type of waste accepted. Therefore, the proposed CUP Modification would not impair an adopted emergency response plan or evacuation plan, nor would it exacerbate wildfire risk, including from installation or maintenance of infrastructure. The proposed CUP Modification would also not expose people or structures to significant risks as a result of runoff post-fire slope instability or drainage changes. No impact would occur.

2.4.4 Mandatory Findings of Significance

Based on the information contained in Section 2.3, *Initial Study Checklist and Discussion of Responses*, the following questions were analyzed in relation to the TOP:

1. 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.
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future).
3. 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 effect of other current projects, and the effect of probable future projects. (Several projects may have relatively small individual impacts on two or more resources, but the total of those impacts on the environment is significant.)
4. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Findings Discussion

1. As stated above throughout the Initial Study, the proposed project does not propose any physical development and existing Conditions of Approval for TRL relate to biological, cultural, historical, and paleontological resources. In addition, the mitigation measures identified in the 1996 FEIR and 2006 IS-MND, with the existing Conditions of Approval would avoid or reduce those impacts to less than significant levels. Therefore, the proposed project would not pose any threat to fish and wildlife, degrade the quality of the environment, nor would it cause substantial adverse effects on human beings, either directly or indirectly.
2. As stated above, the proposed project would not create any significant impacts that would negatively affect long-term environmental goals.
3. As stated in the Initial Study, the proposed project would not create any impacts that are individually limited but cumulatively considerable.
4. As stated in the Initial Study, the proposed project does not involve the use of hazardous materials in a manner that pose any unusual risks. The proposed project does not involve noise that will interfere with surrounding uses, traffic hazards, adverse impacts to water bodies located on or around the project site and will not generate any hazardous wastes at levels higher than what was already analyzed in the 1996 FEIR and 2006 IS-MND. Therefore, the proposed project would not create any environmental effects that will cause substantial adverse effects, either directly or indirectly on human beings.

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