

**APPENDIX C**  
**NOP COMMENT LETTERS AND SUMMARY OF COMMENTS**  
**IN REPSONSE TO THE NOP**

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ARNOLD SCHWARZENEGGER  
GOVERNOR

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



CYNTHIA BRYANT  
DIRECTOR

Notice of Preparation

December 5, 2007

To: Reviewing Agencies  
Re: Scholl Canyon Landfill Expansion  
SCH# 2007121023

Attached for your review and comment is the Notice of Preparation (NOP) for the Scholl Canyon Landfill Expansion draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Ziad ElJack**  
**City of Glendale (Sanitation Districts to prepare CEQA Docs)**  
**1955 Workman Mill Road**  
**Whittier, CA 90601**

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

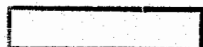
Sincerely,

Scott Morgan  
Project Analyst, State Clearinghouse

Attachments  
cc: Lead Agency

DEC 10 2007 PM 12:56

DOC #



EL Jack Z

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2007121023  
**Project Title** Scholl Canyon Landfill Expansion  
**Lead Agency** Glendale, City of

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**Type** NOP Notice of Preparation

**Description** The Sanitation Districts has identified two variations for the proposed project, which include a vertical expansion only (Variation 1) and a vertical and horizontal expansion (Variation 2). Variation 1 will provide approximately 11 million cubic yards (or five million tons) of additional capacity and will extend the life of the landfill by 12 years (based on current disposal rates at the site). Variation 2 will provide approximately 14 million cubic yards (or six million tons) of additional capacity and will extend the life of the landfill by 15 years (based on current disposal rates at the site). The proposed project will increase fill capacity for the continued operation of the project site and increase the life of the landfill to ensure long-term disposal for the watershed. Neither variation would change current operations at the SCLF.

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**Lead Agency Contact**

**Name** Ziad ElJack  
**Agency** City of Glendale (Sanitation Districts to prepare CEQA Docs)  
**Phone** 562 908-4288 x2764 **Fax**  
**email**  
**Address** 1955 Workman Mill Road  
**City** Whittier **State** CA **Zip** 90601

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**Project Location**

**County** Los Angeles  
**City** Glendale  
**Region**  
**Cross Streets** Figueroa Street/Scholl Canyon Road  
**Parcel No.** Figueroa Street/Scholl Canyon Road  
**Township** 1N **Range** 12,13W **Section** 19,24 **Base** Pasadena

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**Proximity to:**

**Highways** 134  
**Airports**  
**Railways**  
**Waterways** Arroyo Seco  
**Schools** Multiple  
**Land Use** LU: Recreational/Open Space  
Z: SR - Special Recreation

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**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Landuse

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**Reviewing Agencies** Office of Historic Preservation; Department of Parks and Recreation; Department of Fish and Game, Region 5; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; California Highway Patrol; Caltrans, District 7; Air Resources Board, Major Industrial Projects; Integrated Waste Management Board; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4; Resources Agency

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**Date Received** 12/05/2007 **Start of Review** 12/05/2007 **End of Review** 01/03/2008

Resources Agency☐ Resources Agency

Nadell Gayou

☐ Dept. of Boating & Waterways

David Johnson

☐ California Coastal

Commission

Elizabeth A. Fuchs

☐ Colorado River Board

Gerald R. Zimmerman

☐ Dept. of Conservation

Sharon Howell

☐ California Energy

Commission

Paul Richins

☐ Cal Fire

Allen Robertson

☐ Office of Historic

Preservation

Wayne Donaldson

☐ Dept of Parks & Recreation

Environmental Stewardship

Section

☐ Reclamation Board

DeeDee Jones

☐ S.F. Bay Conservation &

Dev't. Comm.

Steve McAdam

☐ Dept. of Water Resources

Resources Agency

Nadell Gayou

☐ ConservancySh and Game☐ Dept. of Fish & Game

Scott Flint

☐ Environmental Services Division

Fish &amp; Game Region 1

Donald Koch

☐ Fish & Game Region 1E

Laurie Hamsberger

☐ Fish & Game Region 2

Banky Curtis

☐ Fish & Game Region 3

Robert Floerke

☐ Fish & Game Region 4

Julie Vance

☒ Fish & Game Region 5

Don Chadwick

☐ Habitat Conservation Program

Habitat Conservation Program

☐ Fish & Game Region 6

Gabrina Gatchel

☐ Fish & Game Region 6 I/M

Gabrina Gatchel

☐ Inyo/Mono, Habitat Conservation

Program

☐ Dept. of Fish & Game M

George Isaac

Marine Region

Other Departments☐ Food & Agriculture

Steve Shaffer

☐ Dept. of Food and Agriculture

Dept. of Food and Agriculture

☐ Dept. of General Services

Public School Construction

☐ Dept. of General Services

Robert Sleppey

Environmental Services Section

☐ Dept. of Health Services

Veronica Malloy

Dept. of Health/Drinking Water

☐ IndependentCommissions/Boards☐ Delta Protection Commission

Debby Eddy

☐ Office of Emergency Services

Dennis Castrillo

☐ Governor's Office of Planning

&amp; Research

State Clearinghouse

☒ Native American Heritage

Comm.

Debbie Treadway

☒ Public Utilities Commission

Ken Lewis

☐ Santa Monica Bay Restoration

Guangyu Wang

☒ State Lands Commission

Jean Saitiro

☐ Tahoe Regional Planning

Agency (TRPA)

Cherry Jacques

Business, Trans & Housing☐ Caltrans - Division of

Aeronautics

Sandy Hesnard

☐ Caltrans - Planning

Terr Pencovic

☒ California Highway Patrol

Shirley Kelly

Office of Special Projects

☐ Housing & Community

Development

Lisa Nichols

Housing Policy Division

☐ Dept. of Transportation

Caltrans, District 1

Rex Jackman

☐ Caltrans, District 2

Marcelino Gonzalez

☐ Caltrans, District 3

Jeff Pulverman

☐ Caltrans, District 4

Tim Sable

☐ Caltrans, District 5

David Murray

☐ Caltrans, District 6

Marc Blimbaum

☒ Caltrans, District 7

Cheryl J. Powell

☐ Caltrans, District 8

Dan Kopulsky

☐ Caltrans, District 9

Gayle Rosander

☐ Caltrans, District 10

Tom Dumas

☐ Caltrans, District 11

Mario Orso

☐ Caltrans, District 12

Ryan P. Chamberlain

Cal EPA☒ Air Resources Board

Airport Projects

Jim Lemer

☐ Transportation Projects

Ravi Ramalingam

☒ Industrial Projects

Mike Tollstrup

☒ California Integrated Waste

Management Board

Sue O'Leary

☐ State Water Resources Control

Board

Regional Programs Unit

Division of Financial Assistance

☐ State Water Resources Control

Board

Student Intern, 401 Water Quality

Certification Unit

Division of Water Quality

☐ State Water Resources Control Board

Steven Herrera

Division of Water Rights

☒ Dept. of Toxic Substances Control

CEQA Tracking Center

☐ Department of Pesticide RegulationRegional Water Quality Control  
Board (RWQCB)☐ RWQCB 1

Cathleen Hudson

North Coast Region (1)

☐ RWQCB 2

Environmental Document

Coordinator

San Francisco Bay Region (2)

☐ RWQCB 3

Central Coast Region (3)

☒ RWQCB 4

Teresa Rodgers

Los Angeles Region (4)

☐ RWQCB 5S

Central Valley Region (5)

☐ RWQCB 5F

Central Valley Region (5)

Fresno Branch Office

☐ RWQCB 5R

Central Valley Region (5)

Redding Branch Office

☐ RWQCB 6

Lahontan Region (6)

☐ RWQCB 6V

Lahontan Region (6)

Victorville Branch Office

☐ RWQCB 7

Colorado River Basin Region (7)

☐ RWQCB 8

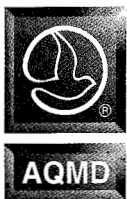
Santa Ana Region (8)

☐ RWQCB 9

San Diego Region (9)

☐ Other

Last Updated on 09/11/07



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

December 13, 2007

Mr. Ziad El Jack  
Sanitation Districts of Los Angeles County  
Planning Section  
1955 Workman Mill Road  
Whittier, CA 90601

Dear Mr. El Jack:

## **Notice of Preparation of a Draft Environmental Impact Report (Draft EIR) for the Scholl Canyon Landfill Expansion**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft environmental impact report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files. Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

### **Air Quality Analysis**

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2007 Model. This model is available on the SCAQMD Website at: [www.urbemis.com](http://www.urbemis.com).

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM2.5 emissions from construction and operational activities and processes. In connection with developing PM2.5 calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address:  
[http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html).

DOC #

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*Cleaning the air that we breathe...*

December 13, 2007

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: [http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html). An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

#### **Mitigation Measures**

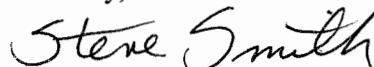
In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html). Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

#### **Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,



Steve Smith, Ph.D.

Program Supervisor, CEQA Section

Planning, Rule Development and Area Sources

SS:CB:AK

LAC071205-02AK

Control Number



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

December 31, 2007

Mr. Ziad El Jack  
Sanitation Districts of Los Angeles County  
Planning Section  
1955 Workman Mill Road  
Whittier, CA 90601

Dear Mr. El Jack:

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JAN 14 2008 AM 10:03



December 31, 2007

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Sincerely,



Steve Smith, Ph.D.

Program Supervisor, CEQA Section

Planning, Rule Development and Area Sources

SS:CB:AK

LAC071205-02AK

Control Number



**Flores, Jerry**

---

**From:** El Jack, Ziad [ZEIJack@lacsds.org]  
**Sent:** Friday, December 21, 2007 11:33 AM  
**To:** Flores, Jerry  
**Subject:** FW: Scholl Canyon Landfill Expansion

-----Original Message-----

**From:** Anna\_Schmidt@fws.gov [mailto:Anna\_Schmidt@fws.gov]  
**Sent:** Monday, December 17, 2007 11:01 AM  
**To:** El Jack, Ziad  
**Subject:** Scholl Canyon Landfill Expansion

Dear Mr. ElJack-

I am reviewing the Notice to Prepare a Draft Environmental Impact Report for the Scholl Canyon Landfill Expansion. I would be interested in viewing the EIR when it is complete. If you could send it to me at the below address, I would appreciate it.

Thank you for your time and the opportunity to review this project.

Anna N. Schmidt  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service  
6010 Hidden Valley Rd  
Carlsbad, CA 92011  
(760) 431-9440 X227

12/21/2007



**Metro**

Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

December 6, 2007

Ziad El Jack  
Sanitation Districts of Los Angeles County  
Planning Section  
1955 Workman Mill Road  
Whittier, CA 90601

Dear Mr. El Jack:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Scholl Canyon Landfill Expansion project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

A Traffic Impact Analysis (TIA), with highway, freeway, and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2004 Congestion Management Program for Los Angeles County", Appendix D. The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic); and
2. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

Among the required steps for the analysis of development-related impacts to transit are:

3. Evidence that in addition to Metro, all affected Municipal transit operators received the NOP for the Draft EIR;
4. A summary of the existing transit services in the area;
5. Estimated project trip generation and mode assignment for both morning and evening peak periods;
6. Documentation on the assumptions/analyses used to determine the number and percentage of trips assigned to transit;

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El Jack Z

7. Information on facilities and/or programs that will be incorporated into the development plan that will encourage public transit usage and transportation demand management (TDM) policies and programs; and
8. An analysis of the expected project impacts on current and future transit services along with proposed project mitigation.

Metro looks forward to reviewing the Draft EIR. If you have any questions regarding this response, please call me at 213-922-6908 or by email at [chapmans@metro.net](mailto:chapmans@metro.net). Please send the Draft EIR to the following address:

Metro CEQA Review Coordination  
One Gateway Plaza MS 99-23-2  
Los Angeles, CA 90012-2952  
Attn: Susan Chapman

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Chapman", with a stylized, flowing script.

Susan Chapman  
Program Manager, Long Range Planning

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7, REGIONAL PLANNING  
IGR/CEQA BRANCH  
100 MAIN STREET, MS # 16  
LOS ANGELES, CA 90012-3606  
PHONE: (213) 897-3747  
FAX: (213) 897-1337



*Flex your power!  
Be energy efficient!*

IGR/CEQA No. 071220AL, NOP  
Scholl Canyon Landfill Expansion  
Vic. LA-134 / PM R11.44  
SCH # 2007121023

December 18, 2007

Mr. Ziad ElJack  
Sanitation Districts of Los Angeles County  
Planning Section  
1955 Workman Mill Road  
Whittier, CA 90601

Dear Mr. ElJack:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project.

To assist us in our efforts to evaluate the impacts of this project on State transportation facilities, a traffic study in advance of the DEIR should be prepared. We wish to refer the project's traffic consultant to our traffic study guideline Website:

<http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

and we list here some elements of what we generally are expecting in the traffic study:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to State Route 134.
2. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. The IGR/CEQA office may use indices to check results. Differences or inconsistencies must be thoroughly explained.
3. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area. This should include freeways, interchanges, and intersections, and all HOV facilities. Interchange Level of Service should be specified (HCM2000 method requested). Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions would include build-out of all projects (see next item) and any plan-horizon years.

*"Caltrans improves mobility across California"*

DEC 20 2007 AM 11:30

DOC #   El Jack Z

4. Inclusion of all appropriate traffic volumes. Analysis should include traffic from the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments. That is, include: existing + project + other projects + other growth.
5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following:
  - Description of Transportation Infrastructure Improvements
  - **Financial Costs, Funding Sources and Financing**
  - Sequence and Scheduling Considerations
  - Implementation Responsibilities, Controls, and Monitoring

Any mitigation involving transit, HOV, or TDM must be rigorously justified and its effects conservatively estimated. Improvements involving dedication of land or physical construction may be favorably considered.

6. Specification of developer's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the developer. The following ratio should be estimated: additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guidelines). That ratio would be the project equitable share responsibility.

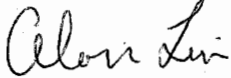
We note for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes which include build-out of all approved and not yet approved projects, and other sources of growth. Analytical methods such as select-zone travel forecast modeling might be used.

The Department as commenting agency under CEQA has jurisdiction superceding that of MTA in identifying the freeway analysis needed for this project. Caltrans is responsible for obtaining measures that will off-set project vehicle trip generation that worsens Caltrans facilities and hence, it does not adhere to the CMP guide of 150 or more vehicle trips added before freeway analysis is needed. MTA's Congestion Management Program in acknowledging the Department's role, stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System. Therefore State Route(s) mentioned in item #1 and its facilities must be analyzed per the Department's Traffic Impact Study Guidelines.

We look forward to reviewing the traffic study. We expect to receive a copy from the State Clearinghouse when the DEIR is completed. However, to expedite the review process, and clarify any misunderstandings, you may send a copy in advance to the undersigned.

If you have any questions, please feel free to contact me at (213) 897-3747 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 071220AL.

Sincerely,

*for*   
CHERYL J. POWELL  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-6251  
Fax (916) 657-5390  
[www.nahc.ca.gov](http://www.nahc.ca.gov)  
[ds\\_nahc@pacbell.net](mailto:ds_nahc@pacbell.net)



December 27, 2007

Mr. Ziad ElJack

**CITY OF GLENDALE SANITATION DISTRICTS**

1955 Workman Mill Road  
Whittier, CA 90601

Re: SCH# 2007121023; CEQA Notice of Preparation (NOP) draft Environmental Impact Report (DEIR) for the Scholl Canyon Landfill Expansion Project; City of Glendale Sanitation Districts; Los Angeles County, California

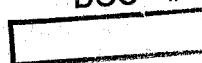
Dear Mr. ElJack:

Thank you for the opportunity to comment on the above-referenced document. The Native American Heritage Commission is the state agency designated for the protection of California's Native American cultural resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations § 15064.5(b)(c) (CEQA Guidelines). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE),' and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

- ✓ Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the 'Information Center' nearest you is available from the State Office of Historic Preservation in Sacramento (916/653-7278). The record search will determine:
  - If a part or the entire (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded in or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission (NAHC) for:
  - A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity who may have information on cultural resources in or near the APE. Please provide us site identification as follows: USGS 7.5-minute quadrangle citation with name, township, range and section. This will assist us with the SLF.
  - Also, we recommend that you contact the Native American contacts on the attached list to get their input on the effect of potential project (e.g. APE) impact. In many cases a culturally-affiliated Native American tribe or person will be the only source of information about the existence of a cultural resource.
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f) of the California Code of Regulations (CEQA Guidelines). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

DEC 31 2007 AM 11:52

DOC #



El Jack Z

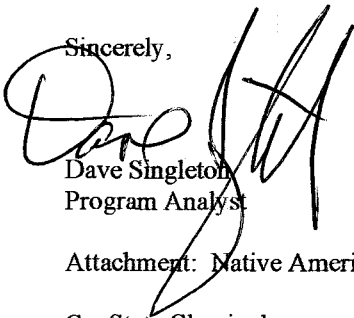
√ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigations plans.

- CEQA Guidelines §15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the Initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American groups, identified by the NAHE, to ensure the appropriate and dignified treatment of Native American human remains and any associated grave goods.
- Health and Safety Code §7050.5, Public Resources Code §5097.98 and CEQA Guidelines §15064.5(d) mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

√ Lead agencies should consider avoidance, as defined in CEQA Guidelines §15370 when significant cultural resources are discovered during the course of project planning or execution.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton  
Program Analyst

Attachment: Native American Contact List

Cc: State Clearinghouse



**Native American Contacts  
Los Angeles County  
December 27, 2007**

**Beverly Salazar Folkes**  
1931 Shadybrook Drive  
Thousand Oaks , CA 91362  
805 492-7255

**Chumash  
Tataviam  
Fernandeño**

**Tongva Ancestral Territorial Tribal Nation**  
**John Tommy Rosas, Tribal Administrator**  
4712 Admiralty Way, Suite 172  
Marina Del Rey , CA 90292  
310-570-6567  
**Gabrielino Tongva**

**Fernandeno Tataviam Band of Mission Indians**  
Randy Guzman-Folkes, Cultural/Environ Depart  
601 South Brand Boulevard, Suite 102  
San Fernando , CA 91340  
ced@tataviam.org  
(818) 837-0794 Office  
(805) 501-5279 Cell  
(818) 837-0796 Fax

**Fernandeno  
Tataviam**

**Kitanemuk & Yowlumne Tejon Indians**  
**Delia Dominguez**  
981 N. Virginia  
Covina , CA 91722  
(626) 339-6785  
**Yowlumne  
Kitanemuk**

**LA City/County Native American Indian Comm**  
**Ron Andrade, Director**  
3175 West 6th Street, Rm. 403  
Los Angeles , CA 90020  
(213) 351-5324  
(213) 386-3995 FAX

**Gabrieleno/Tongva San Gabriel Band of Mission  
Indians - Anthony Morales, Chairperson**  
PO Box 693  
San Gabriel , CA 91778  
ChiefRBwife@aol.com  
(626) 286-1632  
(626) 286-1758 - Home  
(626) 286-1262 Fax  
**Gabrielino Tongva**

**Ti'At Society**  
**Cindi Alvitre**  
6515 E. Seaside Walk, #C  
Long Beach , CA 90803  
calvitre@yahoo.com  
(714) 504-2468 Cell  
**Gabrielino**

**Gabrielino/Tongva Council / Gabrielino Tongva Nation**  
**Sam Dunlap, Tribal Secretary**  
761 Terminal Street; Bldg 1, 2nd floor  
Los Angeles , CA 90021  
office @tongvatribes.net  
(213) 489-5001 - Officer  
(909) 262-9351 - cell  
(213) 489-5002 Fax  
**Gabrielino Tongva**

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed SCH#2007121023; CEQA Notice of Preparation (NOP) draft Environmental Impact Report (DEIR) for Scholl Canyon Landfill Expansion Project; City of Glendale Sanitation Districts; Los Angeles County, California.

**Native American Contacts  
Los Angeles County  
December 27, 2007**

Gabrielino Tongva Indians of California Tribal Council  
Robert Dorame, Tribal Chair/Cultural Resources  
5450 Slauson, Ave, Suite 151 PMB Gabrielino Tongva  
Culver City , CA 90230  
gtongva@verizon.net  
562-761-6417 - voice  
562-925-7989 - fax

**This list is current only as of the date of this document.**

**Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.**

**This list is only applicable for contacting local Native American with regard to cultural resources for the proposed SCH#2007121023; CEQA Notice of Preparation (NOP) draft Environmental Impact Report (DEIR) for Scholl Canyon Landfill Expansion Project; City of Glendale Sanitation Districts; Los Angeles County, California.**

**Flores, Jerry**

---

**From:** El Jack, Ziad [ZEIJack@lacsds.org]  
**Sent:** Wednesday, January 02, 2008 10:35 AM  
**To:** Flores, Jerry  
**Subject:** FW: Scholl Canyon Landfill Expansion

-----Original Message-----

**From:** James Tebbetts [mailto:tebbetts@scag.ca.gov]  
**Sent:** Tuesday, December 18, 2007 8:32 AM  
**To:** El Jack, Ziad  
**Subject:** Scholl Canyon Landfill Expansion

Just a follow up to my phone call, looking for a general service area for the landfill.

Thanks

JIM Tebbetts  
213 236-1915

1/2/2008

## Flores, Jerry

---

**From:** El Jack, Ziad [ZElJack@lacsds.org]  
**Sent:** Wednesday, January 02, 2008 1:58 PM  
**To:** Flores, Jerry  
**Subject:** FW: Scholl Canyon Landfill Expansion EIR

-----Original Message-----

From: Edel Vizcarra [mailto:Edel.Vizcarra@lacity.org]  
Sent: Wednesday, January 02, 2008 12:15 PM  
To: El Jack, Ziad  
Cc: Jessica Wethington Mclean  
Subject: Re: Scholl Canyon Landfill Expansion EIR

Hi Ziad,

Hope you had a Happy New Year.

Edel Vizcarra  
Assistant Planner  
Office of Councilmember José Huizar  
200 N. Spring Street Room 465  
Los Angeles, CA 90012  
(213) 473-7014  
Edel.Vizcarra@Lacity.org

>>> "El Jack, Ziad" <ZElJack@lacsds.org> 1/2/2008 12:09 PM >>>

Hi Edel

Thank you for your call last Thursday re the above project.  
Just a quick email to confirm your email address and request your mailing address for future mailings.  
Thanks

Ziad A. El Jack, P.E.  
Planning Section  
Sanitation Districts of Los Angeles County  
1955 Workman Mill Road, Whittier, CA 90601  
(562) 908-4288 extension 2764  
(562) 695-1874 fax



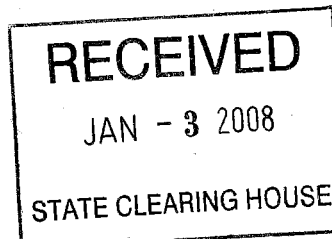
LINDA S. ADAMS  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

# CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD



ARNOLD SCHWARZENEGGER  
GOVERNOR

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812-4025  
(916) 341-6000 • WWW.CIWMB.CA.GOV



MARGO REID BROWN  
CHAIR  
MBROWN@CIWMB.CA.GOV  
(916) 341-6051

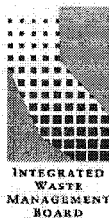
WESLEY CHESBRO  
WCHEBRO@CIWMB.CA.GOV  
(916) 341-6039

JEFFREY DANZINGER  
JDANZINGER@CIWMB.CA.GOV  
(916) 341-6024

ROSALIE MULE  
RMULE@CIWMB.CA.GOV  
(916) 341-6016

CHERYL PEACE  
CPEACE@CIWMB.CA.GOV  
(916) 341-6010

GARY PETERSEN  
GPETERSEN@CIWMB.CA.GOV  
(916) 341-6035



January 3, 2008

Mr. Ziad El Jack  
Sanitation Districts of Los Angeles County  
Planning Section  
1955 Workman Mill Road  
Whittier, CA 90601

**Subject:** SCH No. 2007121023 – Notice of Preparation of a Draft Environmental Impact Report for the Scholl Canyon Landfill Expansion, Solid Waste Facility Permit (SWFP) No. 19-AA-0012, Los Angeles County

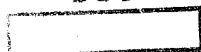
Dear Mr. El Jack:

Board staff of the California Integrated Waste Management Board (CIWMB or Board) has reviewed the document cited above. Following is a description of the proposed project based on Board staff's understanding of the project as described in the Notice of Preparation. If the proposed Project Description below varies substantially from the project as understood by the Lead Agency; Board staff requests that any significant differences be clarified and included in the Draft Environmental Impact Report.

The Sanitation Districts of Los Angeles County, acting on behalf of the City of Glendale – the Lead Agency is proposing two options; 1) a vertical expansion which will provide approximately 11 million cubic yards of additional capacity and extend the life of the landfill by 12 years and 2) a vertical and horizontal expansion which will provide approximately 14 million cubic yards of additional capacity and expand the landfill life by 15 years. Neither variation would change current landfill operations.

There exists the potential to have significant impacts to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Transportation and Traffic and Utilities and Service Systems.

DOC #



### Current Entitlements

	Existing 2002 Permit
Permitted Area (in acres)	440 acres
Disposal Footprint	314 acres
Maximum Elevation	1525 feet above MSL
Remaining Permitted Capacity	17.9 million cubic yards
Estimated Closure Date	2019
Peak Tonnage	3400 tons per day
Peak Vehicle Count	NA

### BOARD STAFF'S COMMENTS

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

To assist Board staff's analysis and evaluation of this project, and aid in the determination of the adequacy of the Environmental Impact Report and related CEQA document(s), we request that the following comments and questions be addressed in the Draft Environmental Impact Report under preparation by the Lead Agency.

As required by Title 14 California Code of Regulations (14 CCR) Sections 15126.2, 15126.4 and 15126.6, Board staff requests that the Draft Environmental Impact Report contain detailed considerations and discussions of the significant effects, mitigation measures and alternatives for the proposed project including the alternative of "no project."

*The Draft Environmental Impact Report must discuss procedures or provisions to indicate the ability of the facility to meet State Minimum Standards for environmental protection* (see 27 CCR §§ 20005 et. seq. and 14 CCR §§ 17000 et. seq.). The following internet link accesses checklists developed by Board staff as a guide to Lead Agencies in the preparation of Environmental Impact Reports for landfills:  
<http://www.ciwmb.ca.gov/LEACentral/CEQA/disposal.htm>.

### Public Meetings

While public meetings, at this time are not required for Environmental Impact Reports and Negative Declarations, *Board staff highly recommends that a series of public meetings be held even if there is no organized group or groups opposed to the project.*

### Environmental Justice

Environmental Justice is not a part of statute or regulations involving CEQA or the operation and evaluation of environmental documents relating to proposed projects that fall under the purview of the Board. Board members have taken a proactive stance

towards environmental justice and expect that it be included and considered in projects coming before them for concurrence.

### **Cumulative Impacts**

*It is important that the Draft Environmental Impact Report address the cumulative impacts resulting from the proposed project as well as those incremental impacts resulting from the proposed projects' implementation.*

### **Mitigation Reporting or Monitoring Program**

*The Mitigation Reporting or Monitoring Program should indicate that agencies designated to enforce mitigation measures in the Mitigated Negative Declaration have reviewed the Mitigation Reporting or Monitoring Program and agreed that they have the authority and means to accomplish the designated enforcement responsibilities.*

### **CONCLUSION**

Board staff requests copies of any subsequent or revised environmental documents in addition to the Draft and Final Environmental Impact Reports. Any subsequent or revised environmental documents should be circulated through the State Clearinghouse as required in 14 CCR §15205(a) of the CEQA Guidelines. The Board requests being noticed of the date, time and location of any public hearings regarding the project proposal at least ten days in advance.

Board staff has no further comments on the project as proposed at this time. Thank you for the opportunity to comment on this project in the early planning stages. Permitting staff are available for any planned scoping meetings, workshops or other public meetings.

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

Sincerely,



Raymond M. Seamans  
Waste Compliance and Mitigation Program  
Permitting and LEA Support Division  
South Branch Permitting  
Environmental Review

**California Integrated Waste Management Board**

cc: William Marciniak  
Waste Compliance and Mitigation Program  
Permitting and LEA Support Division  
South Branch Permitting, Region 4  
**California Integrated Waste Management Board**

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

Iris Aguirre, Chief  
County of Los Angeles  
Department of Health Services  
5050 Commerce Drive  
Baldwin Park, CA 91706





# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

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

DONALD L. WOLFE, Director

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

January 14, 2008

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

Mr. Ziad El Jack  
Planning Section  
Sanitation Districts of Los Angeles County  
1955 Workman Mill Road  
Whittier, CA 90601-1415

Dear Mr. El Jack:

### **RESPONSE TO NOTICE OF PREPARATION SCHOLL CANYON LANDFILL EXPANSION**

Thank you for the opportunity to provide comments on the Notice of Preparation (NOP) of the Draft Environmental Impact Report for the Scholl Canyon Landfill Expansion project. We reviewed the NOP and offer the following comments:

1. Currently, the County's daily disposal needs exceed the capacity available in existing in-County landfills. In anticipation of the closure of Puente Hills Landfill in 2013, the County will experience an aggravated demand for disposal capacity. As a result, extending the remaining landfill space within Los Angeles County is absolutely vital to protecting public health and safety, keeping long-term disposal rates stable, and mitigating the impact of solid waste management on the environment. Since this project will provide additional capacity for the City of Glendale and neighboring watershed jurisdictions, it is consistent with the goals and policies of the Countywide Siting Element approved by the majority of the cities in the County and County Board of Supervisors.
2. According to page 5 of the NOP, Scholl Canyon Landfill currently accepts 1,400 tons per day. However, according to our disposal records, the average disposal rate in 2007 is 1,400 tons per day. Because the acceptance rate includes the amount of materials accepted for beneficial use and the disposal rate, please clarify the current and anticipated disposal and acceptance rates.


Mr. El Jack  
January 14, 2008  
Page 2

3. Please include a discussion on whether any fire incidents have occurred at Scholl Canyon Landfill in Section M(1)(a), page 27.

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

Very truly yours,

DONALD L. WOLFE  
Director of Public Works

  
CARLOS RUIZ  
Assistant Division Engineer  
Environmental Programs Division

LL:cw  
P:\sec\Scholl IS Comments

Gerald Rankin  
2423 Hollister Terr.  
Glendale, CA 91206  
Tel: (818) 241-0450

January 11, 2008

Sanitation Districts of Los Angeles County  
Planning Section  
1955 Workman Mill Road  
Whittier, CA 90601  
Attn: Mr. Ziad El Jack

Dear Sirs:

As a member of the Board of the Glenoaks Canyon Homeowners Association and as a long-time resident of Glenoaks Canyon, I am sending you my comments opposing the proposal to expand the Scholl Canyon Landfill.

While the existing design of the Landfill calls for the facility to close in 2020, the proposed options to expand the Landfill are estimated to add 12 or 15 years to the operating life of the facility. The expansion would result in further fundamental changes to the landscape of Glenoaks Canyon, raising the profile of the Landfill by a substantial but unstated height. As the preliminary report entitled "Notice of Preparation" indicates, expansion of the Landfill would involve numerous potential adverse impacts. In fact, the report identifies 37 potentially significant adverse impacts, including damage to the "existing visual character or quality of the site and its surroundings," including landslides and "seismic-related ground failure," and including degradation of air quality and water quality.

The Glenoaks Canyon Homeowners Association serves residents in more than 750 homes. All of these residents would feel the consequences of these impacts. Based on the preliminary report, it is inconceivable that they would welcome expansion of the Landfill.

I have lived in Glenoaks Canyon for more than 60 years, having been raised on Hollister Terrace and then having returned there once my parents moved away upon my father's retirement. The construction of the Landfill was one of the factors that prompted my parents to move from the Canyon to Northern California.

JAN 14 2008 PM 12:39

DOC #



EL JACK Z

I have intense memories of the Canyon before the Scholl Canyon Landfill was begun. I can remember boyhood expeditions into the wild area beyond the end of Glenoaks Blvd. That area was a superb natural riparian eco-system, densely forested with live oaks, sycamores, and other native trees and graced with a seasonal stream that flowed over waterfalls and through rapids. The natural profile of the hills beautifully complimented the canyon below. All of this was buried by the Scholl Canyon Landfill.

The Landfill has extracted a heavy price from the residents of Glenoaks Canyon. The costs not only have involved aesthetic losses. Objectionable odors rose from the Landfill for many years, signaling degradation of air quality that presented health hazards for residents of the Canyon. Meanwhile, heavy traffic generated by the recreational facilities constructed on the Landfill site became a serious problem on Glenoaks Blvd. It is difficult to estimate how much the Landfill has adversely affected property values. However, the losses in value have been significant, constituting a substantial transfer of wealth from Canyon residents to others in surrounding communities. Expansion of the Scholl Canyon Landfill and extension of its operating life beyond 2020 would compound the ecological damage already sustained by Glenoaks Canyon and would require the residents of the Canyon to make further sacrifices that they or the City leaders never bargained for 50 years ago when the Landfill was first opened.

The preliminary report states that the Scholl Canyon Landfill is designed to operate until 2020, assuming that it continues to receive trash at the current level of 1400 tons per day. It states that a number of other operating landfills in the area will be closed by 2020 and "a shortfall of in-county disposal is expected." The implication is that the entire Los Angeles Basin will experience a trash-disposal crises by 2020. Carl Raggio, former mayor of Glendale, wrote in a recent article in the "Glendale News-Press" that the proposed expansion of the Landfill would "buy time" for the City of Glendale.

Glendale and Los Angeles County should not be distracted with buy-time or band-aid measures. They should be focused on serious, long-lasting solutions. The most obvious of these involves two prongs: 1) achieve reductions in the production of waste through a program of economic carrots and sticks; 2) dispose of whatever waste is produced through converting it into energy. With current technology, converting trash into energy calls for incineration, employing high-quality scrubbers to take out air-polluting contaminates. Presumably, power-producing incinerators would be located in industrial areas, not in residential or recreational areas such as the San Rafael Hills where the Scholl Canyon Landfill is located. As with even the best trash-disposal facilities, a substantial level of traffic, noise, noxious odors, and grime would be involved.

Some 50 years ago the people of Glenoaks Canyon were compelled to make a major sacrifice for the benefit of persons living in the rest of Glendale and surrounding communities, but they were promised that the sacrifice would have a specified end to it.

Sixty years is more than enough. I believe it is wrong to extend the life of the Scholl Canyon Landfill beyond the time originally contemplated. Such a course of action would pile more adverse impacts on Canyon residents in addition to those already endured.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerald E Rankin". The signature is fluid and cursive, with a large initial "G" and "R".

Gerald Rankin  
Board Member, Glenoaks Canyon  
Homeowners Association (GOCHA)

CC: Joan Morris, President of GOCHA

**DEPARTMENT OF FISH AND GAME**<http://www.dfg.ca.gov>

South Coast Region

4949 Viewridge Avenue

San Diego, CA 92123

(858) 467-4201



January 11, 2008

Mr. Ziad El Jack  
Sanitation Districts of Los Angeles County  
1955 Workman Mill Road  
Whittier, CA 90601

**Notice of Preparation of a  
Draft Environmental Impact Report for the  
Interstate 5 High Occupancy (HOV) Vehicle/Truck Lane Project  
SCH # 2007051028, Los Angeles County**

Dear Mr. Jack:

The Department of Fish and Game (Department) has reviewed the above-referenced Notice of Preparation (NOP), for a Draft Environmental Impact Report relative to impacts to biological resources. The project proposes two design variations to increase waste capacity at the Scholl Canyon Class III Sanitary Landfill. The project proposes either a vertical expansion only (Variation 1) or a vertical and horizontal expansion (Variation 2) which will extend the life of the landfill by 12 years and 15 years respectively. The project is located in the City of Glendale north of the Ventura Freeway (SR 134) and the Figueroa Street exit to Scholl Canyon Road.

To enable Department staff to adequately review and comment on the proposed project we recommend the following information, where applicable, be included in the Draft Environmental Impact Report:

1. A complete, recent assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats (Attachment 1).
  - a. A thorough recent assessment of rare plants and rare natural communities, following the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities.
  - b. A complete, recent assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and U.S. Fish and Wildlife Service.

DOC #

JAN 14 2008 PM 12:15

LEBRON T

- c. Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, Section 15380).
  - d. The Department's Wildlife Habitat Data Analysis Branch in Sacramento should be contacted at (916) 322-2493 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs) or Environmentally Sensitive Habitats (ESHs) or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area must be addressed.
2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts.
- a. CEQA Guidelines, Section 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
  - b. Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas are of concern to the Department and should be fully evaluated and provided. The analysis should also include a discussion of the potential for impacts resulting from such effects as increased vehicle traffic, outdoor artificial lighting, noise and vibration.
  - c. A cumulative effects analysis should be developed as described under CEQA Guidelines, Section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
  - d. Impacts to migratory wildlife affected by the project should be fully evaluated including proposals to removal/disturb native and ornamental landscaping and other nesting habitat for native birds. Impact evaluation may also include such elements as migratory butterfly roost sites and neo-tropical bird and waterfowl stop-over and staging sites. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.
  - e. Impacts to all habitats from City or County required Fuel Modification Zones (FMZ). Areas slated as mitigation for loss of habitat shall not occur within the FMZ.
  - f. Proposed project activities (including disturbances to vegetation) should take place outside of the breeding bird season (February 1- September 1) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). If project activities cannot avoid the breeding bird season, nest surveys should be conducted and active nests should be avoided and provided with a minimum buffer as determined by a biological monitor (the Department recommends a minimum 500-foot buffer for all active raptor nests).

3. A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources including wetlands/riparian habitats, alluvial scrub, coastal sage scrub, Joshua tree woodlands, etc. should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.
  - a. Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Compensation for unavoidable impacts through acquisition and protection of high quality habitat elsewhere should be addressed with offsite mitigation locations clearly identified.
  - b. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts (Attachment 2).
  - c. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.
4. A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to the proposed project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. For these reasons, the following information is requested:
  - a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.
  - b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.
5. The Department opposes the elimination of watercourses (including concrete channels) and/or the canalization of natural and manmade drainages or conversion to subsurface drains. All wetlands and watercourses, whether intermittent, ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations. The Department recommends a minimum natural buffer of 100 feet from the outside edge of the riparian zone on each side of a drainage.
  - a. The Department requires a Streambed Alteration Agreement (SAA), pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to any direct or indirect impact to a lake or stream bed, bank or channel or associated riparian resources. The Department's issuance of a SAA may be a project that is subject to CEQA. To facilitate our issuance of the Agreement when CEQA applies, the

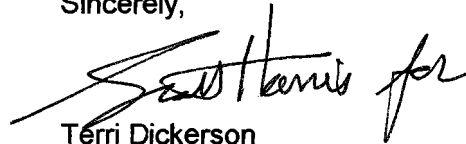


Mr. Ziad El Jack  
January 11, 2008  
Page 4

Department as a responsible agency under CEQA may consider the local jurisdiction's (Lead Agency) document for the project. To minimize additional requirements by the Department under CEQA the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the Agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources.

Thank you for this opportunity to provide comment. Please contact Mr. Scott Harris, Environmental Scientist, at (626) 797-3170 if you should have any questions and for further coordination on the proposed project.

Sincerely,



Terri Dickerson  
Senior Environmental Scientist

Attachments

cc: Mr. Michael Mulligan, San Diego  
Ms. Terri Dickerson, Laguna Niguel  
Mr. Scott Harris, Pasadena  
HCP-Chron  
Department of Fish and Game

State Clearinghouse, Sacramento

SPH:sph  
spharris/ Scholl Canyon Landfill Expansion NOP/2008

## Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities

State of California  
THE RESOURCES AGENCY  
Department of Fish and Game  
December 9, 1983  
Revised May 8, 2000

The following recommendations are intended to help those who prepare and review environmental documents determine **when** a botanical survey is needed, **who** should be considered qualified to conduct such surveys, **how** field surveys should be conducted, and **what** information should be contained in the survey report. The Department may recommend that lead agencies not accept the results of surveys that are not conducted according to these guidelines.

1. Botanical surveys are conducted in order to determine the environmental effects of proposed projects on all rare, threatened, and endangered plants and plant communities. Rare, threatened, and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare, threatened, and/or endangered under the following definitions:

A species, subspecies, or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, or disease. A plant is "threatened" when it is likely to become endangered in the foreseeable future in the absence of protection measures. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

Rare natural communities are those communities that are of highly limited distribution. These communities may or may not contain rare, threatened, or endangered species. The most current version of the California Natural Diversity Database's List of California Terrestrial Natural Communities may be used as a guide to the names and status of communities.

2. It is appropriate to conduct a botanical field survey to determine if, or to the extent that, rare, threatened, or endangered plants will be affected by a proposed project when:

- a. Natural vegetation occurs on the site, it is unknown if rare, threatened, or endangered plants or habitats occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
- b. Rare plants have historically been identified on the project site, but adequate information for impact assessment is lacking.

3. Botanical consultants should possess the following qualifications:

- a. Experience conducting floristic field surveys;
- b. Knowledge of plant taxonomy and plant community ecology;
- c. Familiarity with the plants of the area, including rare, threatened, and endangered species;
- d. Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
- e. Experience with analyzing impacts of development on native plant species and communities.

4. Field surveys should be conducted in a manner that will locate any rare, threatened, or endangered species that may be present. Specifically, rare, threatened, or endangered plant surveys should be:

- a. Conducted in the field at the proper time of year when rare, threatened, or endangered species are both evident and identifiable. Usually, this is when the plants are flowering.

When rare, threatened, or endangered plants are known to occur in the type(s) of habitat present in the project

area, nearby accessible occurrences of the plants (reference sites) should be observed to determine that the species are identifiable at the time of the survey.

b. Floristic in nature. A floristic survey requires that every plant observed be identified to the extent necessary to determine its rarity and listing status. In addition, a sufficient number of visits spaced throughout the growing season are necessary to accurately determine what plants exist on the site. In order to properly characterize the site and document the completeness of the survey, a complete list of plants observed on the site should be included in every botanical survey report.

c. Conducted in a manner that is consistent with conservation ethics. Collections (voucher specimens) of rare, threatened, or endangered species, or suspected rare, threatened, or endangered species should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit requirements. A collecting permit from the Habitat Conservation Planning Branch of DFG is required for collection of state-listed plant species. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.

d. Conducted using systematic field techniques in all habitats of the site to ensure a thorough coverage of potential impact areas.

e. Well documented. When a rare, threatened, or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form, accompanied by a copy of the appropriate portion of a 7.5 minute topographic map with the occurrence mapped, should be completed and submitted to the Natural Diversity Database. Locations may be best documented using global positioning systems (GPS) and presented in map and digital forms as these tools become more accessible.

5. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations and mitigated negative declarations, Timber Harvesting Plans (THPs), EIR's, and EIS's, and should contain the following information:

- a. Project description, including a detailed map of the project location and study area.
- b. A written description of biological setting referencing the community nomenclature used and a vegetation map.
- c. Detailed description of survey methodology.
- d. Dates of field surveys and total person-hours spent on field surveys.
- e. Results of field survey including detailed maps and specific location data for each plant population found. Investigators are encouraged to provide GPS data and maps documenting population boundaries.
- f. An assessment of potential impacts. This should include a map showing the distribution of plants in relation to proposed activities.
- g. Discussion of the significance of rare, threatened, or endangered plant populations in the project area considering nearby populations and total species distribution.
- h. Recommended measures to avoid impacts.
- i. A list of all plants observed on the project area. Plants should be identified to the taxonomic level necessary to determine whether or not they are rare, threatened or endangered.
- j. Description of reference site(s) visited and phenological development of rare, threatened, or endangered plant(s).
- k. Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.
- l. Name of field investigator(s).
- m. References cited, persons contacted, herbaria visited, and the location of voucher specimens.

Attach: 2

### **Sensitivity of Top Priority Rare Natural Communities in Southern California**

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

- S1.# Fewer than 6 known locations and/or on fewer than 2,000 acres of habitat remaining.
- S2.# Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.
- S3.# Occurs in 21-100-known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

S1.1 = very threatened  
S2.2 = threatened  
S3.3 = no current threats known

### **Sensitivity Rankings (February 1992)**

<u>Rank</u>	<u>Community Name</u>
S1.1	Mojave Riparian Forest Sonoran Cottonwood Willow Riparian Mesquite Bosque Elephant Tree Woodland Crucifixion Thorn Woodland Allthorn Woodland Arizonan Woodland Southern California Walnut Forest Mainland Cherry Forest Southern Bishop Pine Forest Torrey Pine Forest Desert Mountain White Fir Forest Southern Dune Scrub Southern Coastal Bluff Scrub Maritime Succulent Scrub Riversidean Alluvial Fan Sage Scrub Southern Maritime Chaparral Valley Needlegrass Grassland Great Basin Grassland Mojave Desert Grassland Pebble Plains Southern Sedge Bog Cismontane Alkali Marsh

- S1.2                      Southern Foredunes  
                             Mono Pumice Flat  
                             Southern Interior Basalt Flow Vernal Pool
- S2.1                      Venturan Coastal Sage Scrub  
                             Diegan Coastal Sage Scrub  
                             Riversidean Upland Coastal Sage Scrub  
                             Riversidean Desert Sage Scrub  
                             Sagebrush Steppe  
                             Desert Sink Scrub  
                             Mafic Southern Mixed Chaparral  
                             San Diego Mesa Hardpan Vernal Pool  
                             San Diego Mesa Claypan Vernal Pool  
                             Alkali Meadow  
                             Southern Coastal Salt Marsh  
                             Coastal Brackish Marsh  
                             Transmontane Alkali Marsh  
                             Coastal and Valley Freshwater Marsh  
                             Southern Arroyo Willow Riparian Forest  
                             Southern Willow Scrub  
                             Modoc-Great Basin Cottonwood Willow Riparian  
                             Modoc-Great Basin Riparian Scrub  
                             Mojave Desert Wash Scrub  
                             Engelmann Oak Woodland  
                             Open Engelmann Oak Woodland  
                             Closed Engelmann Oak Woodland  
                             Island Oak Woodland  
                             California Walnut Woodland  
                             Island Ironwood Forest  
                             Island Cherry Forest  
                             Southern Interior Cypress Forest  
                             Bigcone Spruce-Canyon Oak Forest
- S2.2                      Active Coastal Dunes  
                             Active Desert Dunes  
                             Stabilized and Partially Stabilized Desert Dunes  
                             Stabilized and Partially Stabilized Desert Sandfield  
                             Mojave Mixed Steppe  
                             Transmontane Freshwater Marsh  
                             Coulter Pine Forest  
                             Southern California Fellfield  
                             White Mountains Fellfield
- S2.3                      Bristlecone Pine Forest  
                             Limber Pine Forest



January 14, 2008

Ziad El Jack  
Sanitation Districts of Los Angeles County, Planning Section  
1955 Workman Mill Road  
Whittier, CA 90601

Re: Notice of Preparation (NOP) of the Draft Environmental Impact Report (Draft EIR)  
for the Scholl Canyon Landfill Expansion Project

Dear Mr. Jack:

Southern California Edison (SCE) appreciates the opportunity to provide comment on the NOP for the Scholl Canyon Landfill Expansion Project. The NOP states that the Sanitation Districts have identified two variations for the proposed project, a vertical expansion only and a vertical and horizontal expansion. Variation 1 will provide approximately 11 million cubic yards of additional capacity and will extend the life of the landfill by 12 years. Variation 2 will provide approximately 14 million cubic yards of additional capacity and will extend the life of the landfill by 15 years. The Landfill is located in the City of Glendale north of the Ventura Freeway (SR 134) at the Figueroa Street exit to Scholl Canyon Road. The landfill is operated on land owned by the City, County and SCE.

The Scholl Canyon Landfill Expansion Project may have potentially significant impacts to SCE transmission Facilities. There are three SCE 220 kilovolt (kV) lines and one 66 kV line running along the north easterly boundary of the project. With the maps provided, it is not clear whether this project will impact the 220 kV and 66 kV circuits. In order to more clearly assess the impacts to SCE transmission facilities, please provide 5 sets each of project plans, including street improvement and grading plans with SCE facilities mapped (including structure numbers), to the following location:

Real Estate Operations  
Southern California Edison Company  
14799 Chestnut Street, Westminster, CA 92683

Please note, if it is determined that the project impacts SCE's facilities and other SCE resources, these impacts would need to be addressed and agreed to in writing by SCE prior to finalizing the development plan.

JAN 18 2008 AM 11:31 DOC # LEBRUN T



Please be advised when development plans result in the need to build new or relocate existing SCE electrical facilities at or above 50 kV, the SCE construction may have environmental consequences subject to CEQA provisions, as implemented by the CPUC. If those environmental consequences are identified and addressed in the CEQA process for the larger project by the local agency, SCE may not be required to pursue mandatory CEQA review through the CPUC's General Order 131-D (GO 131-D) process. If the SCE facilities are not adequately addressed in the Draft EIR and the new facilities could result in significant environmental impacts, additional CEQA review could delay approval of the SCE power line portion of the project.

To be sure that such analysis fully complies with CPUC environmental requirements; the Draft/Final EIR must address the following discussion items:

1. Identify the location and length of any existing SCE transmission or subtransmission facilities that may need to be relocated to accommodate the proposed development, or any new transmission or subtransmission or substation facilities required to serve the development.
2. If any SCE facilities will be impacted by the development, describe the existing environmental setting for the SCE portion of the project, including any biological, archaeological, aesthetic or other sensitivities. Include analysis of potentially significant environmental impacts and any mitigation measures that could reduce the level of environmental impacts to less than significant.

We hope that these comments will assist you in the preparation of the Draft EIR for this project and look forward to reviewing the Draft EIR upon its completion. If you have any questions regarding this letter, do not hesitate to contact me at (626) 303-8429.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Ford", written over the word "Sincerely,".

David A. Ford  
Public Affairs Region Manager  
Southern California Edison Company



JOSE HUIZAR  
COUNCILMEMBER, 14TH DISTRICT

Zaid El Jack  
Sanitation Districts of Los Angeles County  
Planning Section  
1955 Workman Mill Road  
Whittier, CA 90601

January 14, 2008

Dear Mr. El Jack:

It has come to my attention that the Sanitation Districts of Los Angeles County, acting on behalf of the City of Glendale, CA, is proposing to extend the life of the Scholl Canyon Landfill located in Glendale and will soon begin preparing an Environmental Impact Report on this proposal.

As you may know, the residents of Eagle Rock, in the City of Los Angeles directly adjacent to the Scholl Canyon Landfill, have experienced ongoing impacts related to the landfill from its inception. For years, constituents who live within the vicinity of the Scholl Canyon Landfill have had to endure noise, truck emissions, pollution, traffic and debris generated by the vehicles utilizing the landfill, not to mention the impacts which have been sustained by City of Los Angeles infrastructure and streets, which provide the only ingress and egress route available to the landfill, though the landfill itself is unusable by Los Angeles residents.

As you prepare to conduct an Environmental Impact Report for this proposal, I expect the above-mentioned impacts and any others which affect the City of Los Angeles will be thoroughly considered and appropriate mitigation measures proposed and discussed at length with my office and the affected public.

I expect that any and all steps in this important CEQA process going forward will be noticed to constituents, including, but not limited to, timely mailings to the affected area to ensure the opportunity for public comment to be solicited and received from the most affected and interested parties.

In short, I expect my office and the residents of the City of Los Angeles to be considered with the utmost concern and consideration throughout this process, and I intend to remain vigilant in my efforts to protect the interests of my constituents and the City of Los Angeles.

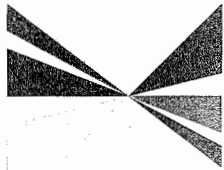
If you have any questions, please do not hesitate to contact Edel Vizcarra in my City Hall office at (213) 473-7014 or by e-mail at [Edel.Vizcarra@lacity.org](mailto:Edel.Vizcarra@lacity.org). Thank you in advance for your consideration.

Sincerely,

José Huizar  
Councilmember, District 14



SOUTHERN CALIFORNIA



**ASSOCIATION of  
GOVERNMENTS**

**Main Office**

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

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[www.scag.ca.gov](http://www.scag.ca.gov)

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**Ventura County:** Linda Parks, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

**Tribal Government Representative:** Andrew Masel, Sr., Pechanga Band of Luiseño Indians

**Orange County Transportation Authority:** Art Brown, Buena Park

**Riverside County Transportation Commission:** Robin Lowe, Hemet

**San Bernardino Associated Governments:** Paul Leon

**Ventura County Transportation Commission:** Keith Millhouse, Moama

December 20, 2007

Mr. Ziad El Jack  
Los Angeles County Sanitation District  
1955 Workman Mill Road  
Whittier, Ca. 90601

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Scholl Canyon Landfill Expansion - SCAG No. I20070731

Dear Mr. Jack,

Thank you for submitting the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Scholl Canyon Landfill Expansion - SCAG No. I20070731, to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082.

SCAG staff has reviewed the aforementioned NOP and has determined that the proposed project is regionally significant per the California Environmental Quality Act (CEQA) Guidelines (Section 15125(d) and 15206). The project proposes to increase the life and fill capacity of the landfill.

CEQA requires that EIRs discuss any inconsistencies between the proposed project and applicable general plans and regional plans (Section 15125 [d]). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided. We expect the DEIR to specifically cite all SCAG policies and address the manner in which the project is consistent, not-consistent, or not applicable to these policies and provide supportive analysis as to why it is consistent, not-consistent, or not applicable to these policies. Policies of SCAG's Regional Comprehensive Plan and Guide (RCPG), Regional Transportation Plan (RTP), and Compass Growth Vision (CGV) that may be applicable to your project are outlined in the attachment. Also, for ease of review, we would encourage you to use a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format (attached). The RCPG, RTP and CGV can be found on the SCAG web site at: <http://scag.ca.gov/igr>

The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. Please provide a minimum of 45 days for SCAG to review the DEIR and associated plans when these documents are available. If you have any questions regarding the attached comments, please contact James R. Tebbetts at (213) 236-1915 or Laverne Jones at (213) 236-1857. Thank you.

Sincerely,

Huasha Liu, Manager

Program Development and Evaluation Division

DOCS# 141604 v1

DOC #

**COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL  
IMPACT REPORT FOR THE SCHOOL CANYON LANDFILL EXPANSION SCAG NO. I20070731**

**PROJECT DESCRIPTION**

The proposed project will increase fill capacity for the continued operation of the project site and increase the life of the landfill to ensure long-term disposal for the watershed. Two proposed variations for the Scholl Canyon Landfill Expansion Project (proposed project) will include a vertical expansion only (Variation 1) and a vertical and horizontal expansion (Variation 2). Variation 1 will provide approximately 11 million cubic yards (five million tons) of additional capacity and will extend the life of the landfill by 12 years (based on current use of the site). Variation 2 will provide approximately 14 million cubic yards (six million tons) of additional capacity and will extend the life of the landfill by 15 years (based on current use of the site). The project is located at 3001 School Canyon Road, Glendale, Ca 91206.

**CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES**

The **Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the DEIR.

- 3.01 *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

**Regional Growth Forecasts**

The DEIR should reflect the most current adopted SCAG forecasts, which are the 2004 RTP (April 2004) Population, Household and Employment forecasts. The adopted forecasts for your region, subregion and city are as follows:

**Adopted SCAG Regionwide Forecasts**

	<b><u>2010</u></b>	<b><u>2015</u></b>	<b><u>2020</u></b>	<b><u>2025</u></b>	<b><u>2030</u></b>
Population	19,208,661	20,191,117	21,137,519	22,035,416	22,890,797
Households	6,072,578	6,463,402	6,865,355	7,263,519	7,660,107
Employment	8,729,192	9,198,618	9,659,847	10,100,776	10,527,202

**Adopted Arroyo Verdugo Cities Forecasts <sup>1</sup>**

	<b><u>2010</u></b>	<b><u>2015</u></b>	<b><u>2020</u></b>	<b><u>2025</u></b>	<b><u>2030</u></b>
Population	360,042	369,816	379,461	388,706	397,568
Households	133,127	137,454	141,860	146,230	150,590
Employment	222,135	235,640	248,534	260,336	271,237

**Adopted San Gabriel Valley Subregion Forecasts <sup>2</sup>**

	<b><u>2010</u></b>	<b><u>2015</u></b>	<b><u>2020</u></b>	<b><u>2025</u></b>	<b><u>2030</u></b>
Population	2,065,918	2,163,074	2,257,808	2,346,874	2,430,652
Households	598,457	633,327	668,667	703,568	738,241
Employment	856,663	882,956	907,883	930,419	950,947

Notes:

1. This includes Burbank, Glendale, La Crescenta, and unincorporated areas
2. This includes Pasadena, South Pasadena, San Marino, Sierra Madre, and other cities and unincorporated areas.

The Draft 2008 RTP Baseline Growth Forecast (built upon subregion/local jurisdiction input) was released on November 1, 2007 by the Community, Economic and Human Development Committee (CEHD) along with the Draft 2008 RTP and RCPG for public review and comment. You may wish to review these forecasts to determine

compatibility with the any Project Forecasts. The following 2035 forecasts are provided for your reference. The forecasts for the intervening years (2010, 2015, 2020, 2025, and 2030) will be included in the 2008 RTP Baseline Growth Forecast.

2035 Forecasts <sup>1</sup>	Population	Households	Employees
Arroyo Verdugo Cities Subregion	406,873	147,710	232,368
San Gabriel Subregion	2,388,057	685,034	890,626
SCAG	24,056,000	7,710,000	10,287,000

1. Source: Draft 2008 RTP Baseline Growth Forecast  
([http://scag.ca.gov/forecast/downloads/RTP\\_baseline\\_forecasts\\_1001.xls](http://scag.ca.gov/forecast/downloads/RTP_baseline_forecasts_1001.xls) )

- 3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

#### **GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING**

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

- 3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

#### **GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE**

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

- 3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*
- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*
- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*
- 3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

#### **AIR QUALITY CHAPTER**

The Air Quality Chapter core actions related to the proposed project include:

- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional, and local) consider air quality, land use, transportation, and economic relationships to ensure consistency and minimize conflicts.*

## **OPEN SPACE AND CONSERVATION CHAPTER (OSCC)**

The **OSCC** goals related to the proposed project includes the following.

- 9.4 *Maintain open space for adequate protection to lives and properties against natural and manmade hazards.*
- 9.5 *Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipments.*
- 9.8 *Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.*

## **REGIONAL TRANSPORTATION PLAN**

The **2004 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

### **Regional Transportation Plan Goals**

- RTP G1 Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2 Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3 Preserve and ensure a sustainable regional transportation system.*
- RTP G4 Maximize the productivity of our transportation system.*
- RTP G6 Encourage land use and growth patterns that complement our transportation investments.*

## **GROWTH VISIONING**

The fundamental goal of the Compass Growth Visioning effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

### ***Principle 1: Improve mobility for all residents***

- GV P1.1 Encourage transportation investments and land use decisions that are mutually supportive.*

### ***Principle 2: Foster livability in all communities***

- GV P2.1 Promote infill development and redevelopment to revitalize existing communities.*

### ***Principle 3: Enable prosperity for all people***

- GV P3.2 Support educational opportunities that promote balanced growth.*
- GV P3.3 Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4 Support local and state fiscal policies that encourage balanced growth*
- GV P3.5 Encourage civic engagement.*

### ***Principle 4: Promote sustainability for future generations***

- GV P4.3 Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4 Utilize "green" development techniques*

## **CONCLUSION**

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

**Suggested Side by Side Format - Comparison Table of SCAG Policies**

For ease of review, we would encourage the use of a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format. All policies and goals must be evaluated as to impacts. Suggest format is as follows:

SCAG RCPG (RTP and/or CGV) Policies		
Growth Management Chapter		
Policy Number	Policy Text	Statement of Consistency, Non-Consistency, or Not Applicable
3.01	<i>The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies shall be used by SCAG in all phases of implementation and review.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
3.02	<i>In areas with large seasonal population fluctuations, such as resort areas, forecast permanent populations. However, appropriate infrastructure systems should be sized to serve high-season population totals.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
3.03	<i>The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
Etc.	Etc.	Etc.

## APPENDIX C

### SUMMARY OF COMMENTS IN RESPONSE TO THE NOP

RESPONDENT	SUMMARY OF COMMENTS	WHERE COMMENT IS ADDRESSED IN THE EIR
Governor's Office of Planning and Research State Clearinghouse	Confirmed the filing of the NOP and identified the review period.	Comment noted
South Coast Air Quality Management District (SCAQMD)	Use guidance from the SCAQMD CEQA Air Quality Handbook (1993) in air quality analysis.	Section 6.2 (Air Quality)
	Include all phases of the project including construction and operational phases.	Section 6.2 (Air Quality)
	Include impacts from indirect sources.	Section 6.2 (Air Quality)
	It is requested that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds.	Section 6.2 (Air Quality)
	It is recommended that a localized significance analysis be performed by using localized significance thresholds or perform dispersion modeling as necessary.	Section 6.2 (Air Quality)
	It is recommended that a mobile source health risk assessment be performed and an analysis of toxic air contaminant impacts should be included.	Section 6.2 (Air Quality)
	If the project generates significant air quality impacts, CEQA requires that all feasible mitigation measures be used during project construction and operation to minimize or eliminate significant air quality impacts. Some may be found in CEQA Air Quality Handbook.	Section 6.2 (Air Quality)
U.S. Fish and Wildlife Service (FWS)	Provide FWS a copy of the completed DEIR.	Comment noted
Metropolitan Transportation Authority (Metro)	<p>A Traffic Impact Analysis (TIA) is required under the State of California Congestion Management Program (CMP) statute. The geographic area examined in the TIA must include the following, at a minimum:</p> <ol style="list-style-type: none"> <li>1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic); and</li> <li>2. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.</li> </ol> <p>Among the required steps for the analysis of development-related impacts to transit are:</p> <ol style="list-style-type: none"> <li>3. Evidence that in addition to Metro, all affected Municipal transit operators received the NOP for the DEIR;</li> <li>4. A summary of the existing transit services in the area;</li> <li>5. Estimated project trip generation and mode assignment for both morning and evening peak periods;</li> </ol>	Section 6.11 (Transportation and Traffic)

## SUMMARY OF COMMENTS IN RESPONSE TO THE NOP

RESPONDENT	SUMMARY OF COMMENTS	WHERE COMMENT IS ADDRESSED IN THE EIR
	<ol style="list-style-type: none"> <li>6. Documentation on the assumptions/ analyses used to determine the number and percentage of trips assigned to transit;</li> <li>7. Information on facilities and/or programs that will be incorporated into the development plan that will encourage public transit usage and transportation demand management (TDM) policies and programs; and</li> <li>8. An analysis of the expected project impacts on current and future transit services along with proposed project mitigation.</li> </ol>	
Department of Transportation – District 7 (Caltrans)	A traffic study in advance of the DEIR should be prepared and a copy sent to Caltrans for review. Refer to Caltrans' traffic study guideline Website.	Comment noted
	<p>The traffic study should include the following elements:</p> <ol style="list-style-type: none"> <li>1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to State Route 134 (SR-134);</li> <li>2. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. The intergovernmental review (IGR)/CEQA office may use indices to check results. Differences of inconsistencies must be thoroughly explained;</li> <li>3. Analysis of average daily traffic (ADT), AM and PM peak-hour volumes for both the existing and future conditions in the affected area. This should include freeways, interchanges, and intersections, and all high-occupancy-vehicle (HOV) facilities. Interchange Level of Service should be specified (HCM2000 method requested). Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions would include build-out of all projects and any plan-horizon years;</li> <li>4. Inclusion of all appropriate traffic volumes. Analysis should include traffic from the project, cumulative traffic generated from all specific approved developments in the areas, and traffic growth other than from the project and developments;</li> <li>5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following: <ul style="list-style-type: none"> <li>• Description of Transportation Infrastructure Improvements</li> <li>• Financial Costs, Funding Sources and Financing</li> <li>• Sequence and Scheduling Considerations</li> <li>• Implementation Responsibilities, Controls, and Monitoring</li> </ul> </li> </ol>	Section 6.11 (Transportation and Traffic)

## SUMMARY OF COMMENTS IN RESPONSE TO THE NOP

RESPONDENT	SUMMARY OF COMMENTS	WHERE COMMENT IS ADDRESSED IN THE EIR
	Any mitigation involving transit, HOV, or TDM must be rigorously justified and its effects conservatively estimated. Improvements involving dedication of land or physical construction may be favorable considered. 6. Specification of developer's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the developer. The following ratio should be estimated: additional traffic volume due to project implementation is divided by the total increase in the traffic volumes.	
	For the purpose of determining project share of costs, the number of trips from the project on each traveling segment or element should be estimated in the context of forecasted traffic volumes which include build-out of all approved and not yet approved projects, and other sources of growth. Analytical methods such as select-zone travel forecast modeling might be used.	Section 6.11 (Transportation and Traffic)
	The Department as commenting agency under CEQA has the jurisdiction superseding that of MTA in identifying the freeway analysis needed for this project.	Comment noted
Native American Heritage Commission (NAHC)	It is recommended to contact the appropriate California Historic Resources Center (CHRIS) to implement a records search.	Section 6.4 (Cultural Resources)
	It is recommended that if an archeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.	Section 6.4 (Cultural Resources)
	It is recommended to contact the NAHC for a Sacred Lands File (SLF) search of the project area.	Section 6.4 (Cultural Resources)
	Lack of surface evidence of archaeological resources does not preclude their subsurface existence.	Section 6.4 (Cultural Resources)
	It is recommended that lead agencies include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.	Section 6.4 (Cultural Resources)
	Health and Safety Code 7050.5, Public Resources Code 5097.98, and Sec. 15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.	Section 6.4 (Cultural Resources)
	It is recommended that the lead agency consider avoidance, as defined in 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.	Section 6.4 (Cultural Resources)
Southern California Association of Governments (SCAG)	Request information regarding the general service area for the landfill.	Comment noted
City of Los Angeles	Request to be included on the project mailing list.	Comment noted



## SUMMARY OF COMMENTS IN RESPONSE TO THE NOP

RESPONDENT	SUMMARY OF COMMENTS	WHERE COMMENT IS ADDRESSED IN THE EIR
California Integrated Waste Management Board (CIWMB), currently Department of Resources Recycling and Recovery (CalRecycle)	Request that any significant differences be clarified and included in the DEIR should the current proposed project description vary substantially.	Comment noted
	Request that the DEIR contain detailed considerations and discussions of the significant effects, mitigation measures and alternatives for the proposed project including the alternative of “no project.”	Section 6.0 (Resource Specific Analysis) Section 11.0 (Project Alternatives)
	The DEIR must discuss procedures or provisions to indicate the ability of the facility to meet State Minimum Standards for environmental protection.	Section 3.0 (Existing Operations)
	Recommend that a series of public meetings be held even if there is no organized group or groups opposed to the project.	Comment noted
	Although Environmental Justice is not a part of statute or regulations involving CEQA, CIWMB expects that it be included and considered in projects coming before them for concurrence.	Comment noted
	It is important that the DEIR address the cumulative impacts resulting from the proposed project as well as those incremental impacts resulting from the proposed project’s implementation.	Section 7.0 (Cumulative Impacts)
	The Mitigation Reporting or Monitoring Program should indicate that agencies designated to enforce mitigation measures in the Mitigated Negative Declaration have reviewed the Mitigation Reporting or Monitoring Program and agreed that they have authority and means to accomplish the designated enforcement responsibilities.	Comment Noted. The Mitigation Monitoring and Reporting Program will be part of the Final EIR.
	Request copies of any subsequent or revised environmental documents in addition to the Draft and Final Environmental Impact Reports. Any subsequent or revised environmental documents should be circulated through the State Clearinghouse as required. Request being noticed of the date, time and location of any public hearings regarding the project proposal at least ten days in advance.	Comment noted
County of Los Angeles Department of Public Works	Extending the remaining landfill space within Los Angeles County is absolutely vital to protecting public health and safety, keeping long-term disposal rates stable, and mitigating the impact of solid waste management on the environment. Since this project will provide additional capacity for the City of Glendale and neighboring watershed jurisdictions, it is consistent with the goals and policies of the Countywide Siting Element approved by the majority of the cities in the County and County Board of Supervisors.	Comment noted
	According to page 5 of the NOP, Scholl Canyon Landfill currently accepts 1,400 tons per day. However, according to our disposal records, the average disposal rate in 2007 is 1,400 tons per day. Because the acceptance rate includes the amount of materials accepted for beneficial use and the disposal rate, please clarify the current and	Section 4.0 (Project Description)

## SUMMARY OF COMMENTS IN RESPONSE TO THE NOP

RESPONDENT	SUMMARY OF COMMENTS	WHERE COMMENT IS ADDRESSED IN THE EIR
	anticipated disposal and acceptance rate.	
	Please include a discussion on whether any fire incidents have occurred at Scholl Canyon Landfill in Section M(1)(a), page 27.	Section 4.0 (Project Description) Section 6.7 (Hazards and Hazardous Materials)
	Expresses concern of potentially significant adverse impacts and states that Glenoaks Canyon residents would feel the consequences of the proposed project's impacts.	Comment noted. Refer to Section 6.0 (Resource Specific Analysis)
Glenoaks Canyon Homeowners Association	Notes current impacts of aesthetic loss, objectional odors and heavy traffic. States that expansion of the Scholl Canyon Landfill would compound these and other existing impacts.	Section 6.0 (Resource Specific Analysis)
	Comments on the use of alternative technology for waste disposal.	Section 11.0 (Project Alternatives)
California Department of Fish and Game (CDFG)	A complete, recent assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats.	Section 6.3 (Biological Resources)
	A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific mitigation measures to offset such impacts should be included in the DEIR.	Section 7.0 (Cumulative Impacts)
	A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources should be included. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.	Section 11.0 (Project Alternatives)
	A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. Early consultation is encouraged.	Section 6.3 (Biological Resources)
	CDFG opposes the elimination of watercourses (including concrete channels) and/or the canalization of natural and manmade drainages or conversion to subsurface drains. All wetlands and watercourses, whether intermittent, ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations. CDFG recommends a minimum natural buffer of 100 feet from the outside edge of the riparian zone on each side of drainage.	Section 6.3 (Biological Resources)
Southern California Edison (SCE)	In order to assess potential impacts to SCE's facilities within the landfill, provide five sets each of project plans, including street improvement and grading plans with SCE facilities mapped (including structure numbers).	Comment noted

## SUMMARY OF COMMENTS IN RESPONSE TO THE NOP

RESPONDENT	SUMMARY OF COMMENTS	WHERE COMMENT IS ADDRESSED IN THE EIR
	If SCE's facilities or other SCE resources are impacted by the project, these impacts would need to be addressed and agreed to in writing by SCE prior to finalizing the development plan.	Comment noted
	<p>If development plans result in the need to construct additional SCE facilities, environmental impacts of those additional impacts would need to be analyzed per CEQA. If additional SCE facilities are not adequately addressed in the DEIR, delays in project approval may occur.</p> <p>The Draft/Final EIR must identify the following items:</p> <ol style="list-style-type: none"> <li>1. Location and length of any existing or new SCE transmission or subtransmission facilities that may need to be relocated to accommodate the proposed project.</li> <li>2. If SCE facilities are to be impacted, describe the existing environmental setting for the SCE portion of the project (including biological, cultural, aesthetic issues etc.). Include analysis of potentially significant impacts and any mitigation measures that would reduce significant impacts to below a level of significance.</li> </ol>	Section 6.0 (Resource Specific Analysis)
Jose Huizar	Requests for issues related to Noise, Air Quality, and Transportation and Traffic to be thoroughly considered in the DEIR.	Section 6.2 (Air Quality), Section 6.10 (Noise), and Section 6.11 (Transportation and Traffic)
	Requests that proposed mitigation measures and the DEIR, in general, be discussed with the City of Los Angeles City Hall and affected public. In addition, expects that the opportunity for public comments to be solicited is sufficient under CEQA.	Comment noted
Southern California Association of Governments	SCAG has determined that the proposed project is regionally significant per the California Environmental Quality Act (CEQA) Guidelines (Section 15125(d) and 15206). The project proposes to increase the life and fill capacity of the landfill.	Comment noted
	If there are any inconsistencies, an explanation and rationalization for such inconsistencies should be provided. Specifically cite all SCAG policies and address the manner in which the project is consistent, non-consistent, or not applicable to these policies and provide a supportive analysis.	Section 6.0 (Resource Specific Analysis)
	SCAG encourages the use of a side-by-side comparison of all SCAG policies with a discussion of consistency, non-consistency or not applicable of the policy and supportive analysis in a table format.	Section 6.0 (Resource Specific Analysis)
	Policies of SCAG's Regional Comprehensive Plan and Guide (RCPG), Regional Transportation Plan (RTP), and Compass Growth Vision (CGV) can be found on the SCAG Website.	Comment noted