

CEQA DOCUMENTATION
for the
INDEPENDENCE LANDFILL
REVISED SOLID WASTE FACILITIES PERMIT
INYO COUNTY, CALIFORNIA

INCLUDING:

- Draft Mitigated Negative Declaration
- Initial Study and Environmental Checklist
- Public Notice and Local Approval Documents

Prepared for:

INYO COUNTY INTEGRATED WASTE MANAGEMENT
785 North Main Street – Suite J
Bishop, California 93514
(760) 873-5577

Prepared by:

ENVIRONMENTAL RESOURCES INTERNATIONAL
2500 Boeing Way
Carson City, Nevada 89706
(775) 883-5557



April, 1999

Project No. 103-01.16



COUNTY OF INYO

ADMINISTRATIVE SERVICES
785 N. MAIN ST., SUITE J
BISHOP, CALIFORNIA 93514

TEL. (760) 873-5577
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DRAFT
MITIGATED NEGATIVE DECLARATION
OF ENVIRONMENTAL IMPACT

PROJECT TITLE:

Revised Solid Waste Facilities Permit
Independence Landfill - Inyo County, California

**LEAD AGENCY NAME
AND ADDRESS:**

Inyo County Department of Environmental Health Services
Post Office Box 427
Independence, California 93526

or,

207 West South Street
Bishop, California 93514

**CONTACT PERSON
AND PHONE NUMBER:**

or,

Robert L. Kennedy, Director
Robert L. Hurd, Deputy Director
(760) 873-7865 or (760) 878-0238

PROJECT LOCATION:

or,

Approximately one mile southeast of the community of
Independence, in central western portion of Inyo County.
sec. 21, T.13 S., R.35 E., MDB&M / APN #22-140-07

**PROJECT SPONSOR'S
NAME AND ADDRESS:**

Inyo County Integrated Waste Management
785 North Main Street, Suite J
Bishop, California 93514

PROJECT DESCRIPTION:

The project involves the issuance of a Revised Solid Waste Facilities Permit, prepared in accordance with state solid waste permitting requirements established by Title 27, California Code of Regulations, Division 2, Chapter 4. The Independence Landfill currently operates under a solid waste facilities permit issued by the Inyo County Health Department in February, 1979. The result of this project will be the issuance of a revised permit that will bring permit conditions into compliance with current state minimum operating standards and accurately reflect current operating conditions.

FINDINGS:

An Initial Study and Environmental Checklist has been prepared by the project sponsor's consultant, Environmental Resources International. A copy of the study is attached with this declaration. The Initial Study and Environmental Checklist indicates that the proposed project, with implementation of recommended mitigation measures, will NOT have a significant adverse impact on the environment for the following reasons:

- A. The proposed project is consistent with the goals and objectives of the Inyo County General Plan. The General Plan Land Use Element designates the project site "Special Use." Landfill operation at the site is consistent with this designation.
- B. The project site meets the requirements of the Inyo County Zoning Ordinance and is consistent with surrounding land uses. The project site has been zoned OS-40 (Open Space - 40 acre minimum).
- C. Existing public and private services are adequate to meet the requirements of the proposed project without the need for their modification, improvement, or expansion.
- D. As mitigated, potential adverse environmental impacts inherent with the proposal will not exceed thresholds of significance either individually or cumulatively.
- E. Based on the information submitted, it has been determined that the project does not have the potential to create a significant adverse impact on local environmental resources, including the following:
 - 1. Aesthetics
 - 2. Agricultural Resources
 - 3. Air Quality
 - 4. Biological Resources
 - 5. Cultural Resources
 - 6. Geology and Soils
 - 7. Mineral Resources
 - 8. Recreational Resources
 - 9. Water Quality

This constitutes a negative finding for the Mandatory Findings of Significance required, pursuant to Section 15065 of the California Environmental Quality Act (CEQA) Guidelines.

Mitigation measures to be incorporated into this Negative Declaration are as follows:

1. Geology and Soils

Potential Impact: The existing landfill is located within Seismic Zone IV (greatest potential for seismic activity). Seismic loading conditions may cause a failure of proposed landfill slopes and features.

Mitigation Measure: Proposed landfill slopes and features were analyzed under seismic loading conditions and have been designed to withstand the maximum probable earthquake without significant failure. Landfill slopes for the project site have been designed flatter (4:1, horizontal-to-vertical) than normal (3:1) as a result of slope stability analyses to minimize potential risk of seismic failure. No structures will be located on areas where waste has been placed, nor will any structures be placed within 25 feet of waste limits.

Impact after Mitigation: Potential impacts will be mitigated to a less-than-significant level.

Implementation: Inyo County Integrated Waste Management shall implement this measure over the active life of the affected landfill.

Monitoring Agencies: Inyo County Integrated Waste Management, Inyo County Department of Environmental Health Services, and/or the California Integrated Waste Management Board.

Potential Impact: Erosion and off-site discharge of suspended solids may occur following precipitation events as a result of exposed soil surfaces and soil characteristics.

Mitigation Measure: In erosion-prone areas, soil surfaces will be compacted, and a retention basin and/or soil berms will be constructed.

Impact after Mitigation: Potential impacts will be mitigated to a less-than-significant level.

Implementation: Inyo County Integrated Waste Management shall implement this measure over the active life of the affected landfill.

Monitoring Agencies: Inyo County Integrated Waste Management, Inyo County Department of Environmental Health Services, and/or the California Integrated Waste Management Board.

2. Hazardous Materials

Potential Impact: A potential hazard to the public may result from the illegal disposal of hazardous materials.

Mitigation Measure: Use of gate attendants at the landfill, installation of perimeter fencing and an entrance gate, and implementation of a load-checking program will ensure that the disposal of hazardous materials is avoided.

Impact after Mitigation: This potential impact will be mitigated to a less-than-significant level.

Implementation: Inyo County Integrated Waste Management shall implement this measure over the active life of the affected landfill.

Monitoring Agencies: Inyo County Integrated Waste Management, Inyo County Department of Environmental Health Services, and/or the California Integrated Waste Management Board.

3. Hydrology and Water Quality

Potential Impact: Leachate generation at the landfill may migrate to the uppermost aquifer and have an adverse impact on ground water quality. The project site is subject to Waste Discharge Requirements issued by the Lahontan Regional Water Quality Control Board (RWQCB).

Mitigation Measure: Application and compaction of daily cover to minimize precipitation infiltration, implementation of a load-checking program to detect and remove liquids from the waste stream, and grading of site surfaces to provide proper drainage and eliminate the potential for ponding of surface water. Also, continued implementation of RWQCB-mandated quarterly ground water monitoring and reporting program.

Impact after Mitigation: This potential impact will be mitigated to a less-than-significant level.

Implementation: Inyo County Integrated Waste Management shall implement this measure over the active life and postclosure maintenance period of the landfill.

Monitoring Agencies: Inyo County Integrated Waste Management, the Lahontan Regional Water Quality Control Board, Inyo County Department of Environmental Health Services, and/or the California Integrated Waste Management Board.

4. Noise

Potential Impact: On-site operation of heavy equipment may subject project employees to high noise levels.

Mitigation Measure: Operators of heavy equipment and other employees shall be provided and trained in the proper use of appropriate noise attenuation safety devices.

Impact after Mitigation: This potential impact will be mitigated to a less-than-significant level.

Implementation: Inyo County Integrated Waste Management shall implement this measure over the active life of the affected landfill.

Monitoring Agencies: Inyo County Integrated Waste Management, Inyo County Risk Manager, and the California Occupational Safety and Health Administration.


The review period for this Draft Mitigated Negative Declaration expires at 5:00 p.m. on **Wednesday, May 19, 1999**. Inyo County is not obligated to respond to any comments received after that date.

Additional information is available from Inyo County Integrated Waste Management. Please contact Mr. Chuck Hamilton, Deputy County Administrator, at (760) 873-5577 if you have any questions regarding this project.

INYO COUNTY ADMINISTRATIVE SERVICES



Chuck Hamilton
Deputy County Administrator



Date

Attachment: Initial Study and Environmental Checklist

**INITIAL STUDY AND
ENVIRONMENTAL CHECKLIST
for the
INDEPENDENCE LANDFILL
REVISED SOLID WASTE FACILITIES PERMIT
*INYO COUNTY, CALIFORNIA***

Prepared for:
INYO COUNTY INTEGRATED WASTE MANAGEMENT
785 North Main Street – Suite J
Bishop, California 93514
(760) 873-5577

Prepared by:
ENVIRONMENTAL RESOURCES INTERNATIONAL
2500 Boeing Way
Carson City, Nevada 89706
(775) 883-5557



April, 1999
Project No. 103-01.16

SIGNATURE PAGE and LIMITATION OF LIABILITY

This *Initial Study and Environmental Checklist* has been prepared by Environmental Resources International on behalf of Inyo County, California in compliance with applicable sections of Title 14, Chapter 3, Article 5, California Code of Regulations, with respect to procedures established under the California Environmental Quality Act. The report is solely intended for the benefit of Inyo County, California, for the site specified herein.

The contents of this report were prepared either directly by, or under the direct supervision of, the undersigned professional civil engineer. This report was prepared in accordance with generally-accepted civil and environmental engineering practices applicable at the time of its preparation. The findings and conclusions presented in this report are based on a review of appropriate literature and information obtained from public sources. Environmental Resources International accepts no liability for the completeness or accuracy of the information provided for the preparation of this document, or for any conclusions and decisions which may be made by Inyo County or others regarding the subject matter. Environmental Resources International makes no other warranties, either expressed or implied, as to the professional advice provided by this report.

ENVIRONMENTAL RESOURCES INTERNATIONAL



Evan Nikirk, P.E.
Senior Engineer

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SECTION 1.0

GENERAL PROJECT INFORMATION

1. Project Title: Revised Solid Waste Facilities Permit
Independence Landfill - Inyo County, California
2. Lead Agency Name and Address: Inyo Co. Dept. of Environmental Health Services
Post Office Box 427
Independence, California 93526
or, 207 West South Street
Bishop, California 93514
3. Contact Person and Phone Number: Robert L. Kennedy, Director
or, Robert L. Hurd, Deputy Director
(760) 873-7865 or (760) 878-0238
4. Project Location: Approximately one mile southeast of the
community of Independence, in the central
western portion of Inyo County.
sec. 21, T.13 S., R.35 E., MDB&M
5. Project Sponsor's Name and Address: Inyo County Integrated Waste Management
785 North Main Street, Suite J
Bishop, California 93514
6. General Plan Designation: Special Use
7. Zoning Classification: Open Space-40 acre minimum (OS-40)
8. Project Description:

The project involves the issuance of a Revised Solid Waste Facilities Permit, prepared in accordance with state solid waste permitting requirements established by Title 27, California Code of Regulations, Division 2, Chapter 4. The Independence Landfill currently operates under a solid waste facilities permit issued by the Inyo County Health Department in February, 1979. The result of this project will be the issuance of a revised permit that will bring permit conditions into compliance with current state minimum operating standards and accurately reflect current operating conditions. A detailed project description is presented in Section 2.0 of this study.

9. Surrounding Land Uses and Setting:

The landfill is located on 90.54 acres of property owned by the LADWP and leased by Inyo County. The landfill is bordered on all sides by undeveloped open space. There are no developments, structures, or businesses located within 1,000 feet of the facility. The Land Use Element of the County General Plan designates the landfill property as Special Use. The

site has a zoning classification of OS-40, or Open Space - 40 acre minimum; all adjacent parcels are also zoned OS-40. Landfill operations at this site are consistent with the County General Plan, surrounding land uses, and all zoning ordinances.

10. Public agencies whose approval is required:

- Inyo County Dept. of Env. Health Services
- Inyo County Planning Commission
- Inyo County Board of Supervisors
- Calif. Integrated Waste Management Board

Other affected public agencies:

- L.A. Department of Water & Power
- Lahontan Regional Water Quality Control Board - Victorville

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, as indicated by the narrative and checklist in the following sections.

<input checked="" type="checkbox"/> Aesthetics	<input checked="" type="checkbox"/> Hazards / Haz. Materials	<input type="checkbox"/> Public Services
<input type="checkbox"/> Agricultural Resources	<input checked="" type="checkbox"/> Hydrology/Water Quality	<input type="checkbox"/> Recreation
<input checked="" type="checkbox"/> Air Quality	<input type="checkbox"/> Land Use / Planning	<input type="checkbox"/> Transportation / Traffic
<input type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Mineral Resources	<input type="checkbox"/> Utilities / Service Systems
<input type="checkbox"/> Cultural Resources	<input checked="" type="checkbox"/> Noise	<input checked="" type="checkbox"/> Mandatory Findings of Significance
<input checked="" type="checkbox"/> Geology / Soils	<input type="checkbox"/> Population / Housing	

SECTION 2.0

PROJECT DESCRIPTION

This *Initial Study and Environmental Checklist* has been prepared to evaluate the proposed project under procedures established by the California Environmental Quality Act. The project under consideration is the issuance of a Revised Solid Waste Facilities Permit by the Inyo County Department of Environmental Health Services. The purpose of this study is to evaluate the proposed project with respect to potential environmental impacts that may result from its implementation. The following narrative presents a summary of the project background and a detailed description of the project.

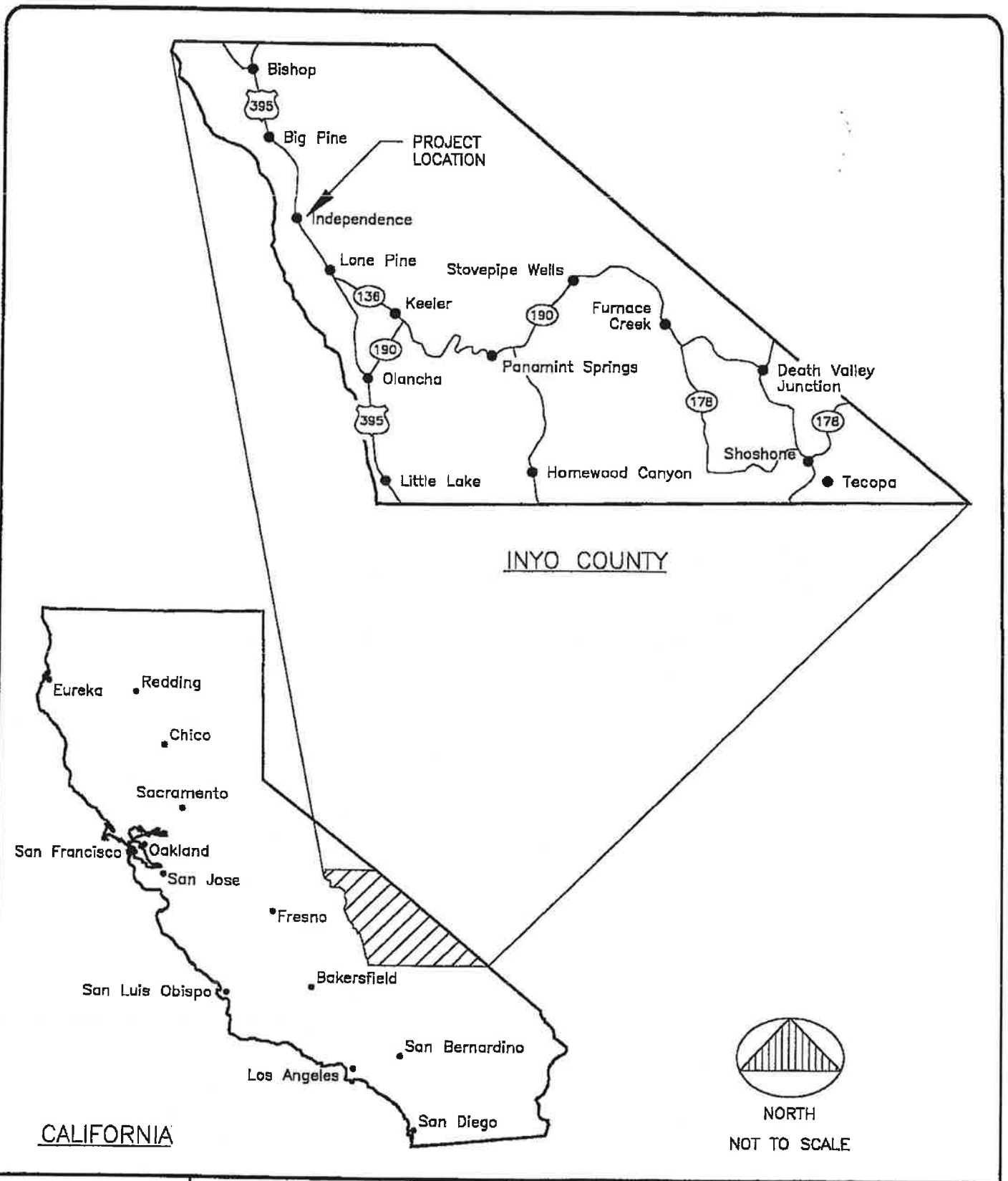
2.1 Project Background

The Independence Landfill was established in 1965 to serve the disposal needs of the residents of Independence, California and the surrounding area. It is designated by the State of California as a Class III disposal site, accepting only non-hazardous municipal solid waste generated within its local service area. Daily operations are conducted in compliance with State Minimum Standards, and an average of four tons of refuse are accepted per operating day for disposal. Location of the site with respect to state and county borders is presented on the attached Figure 1, Site Location Map. Figure 2, Site Vicinity Map, presents the site within its local setting.

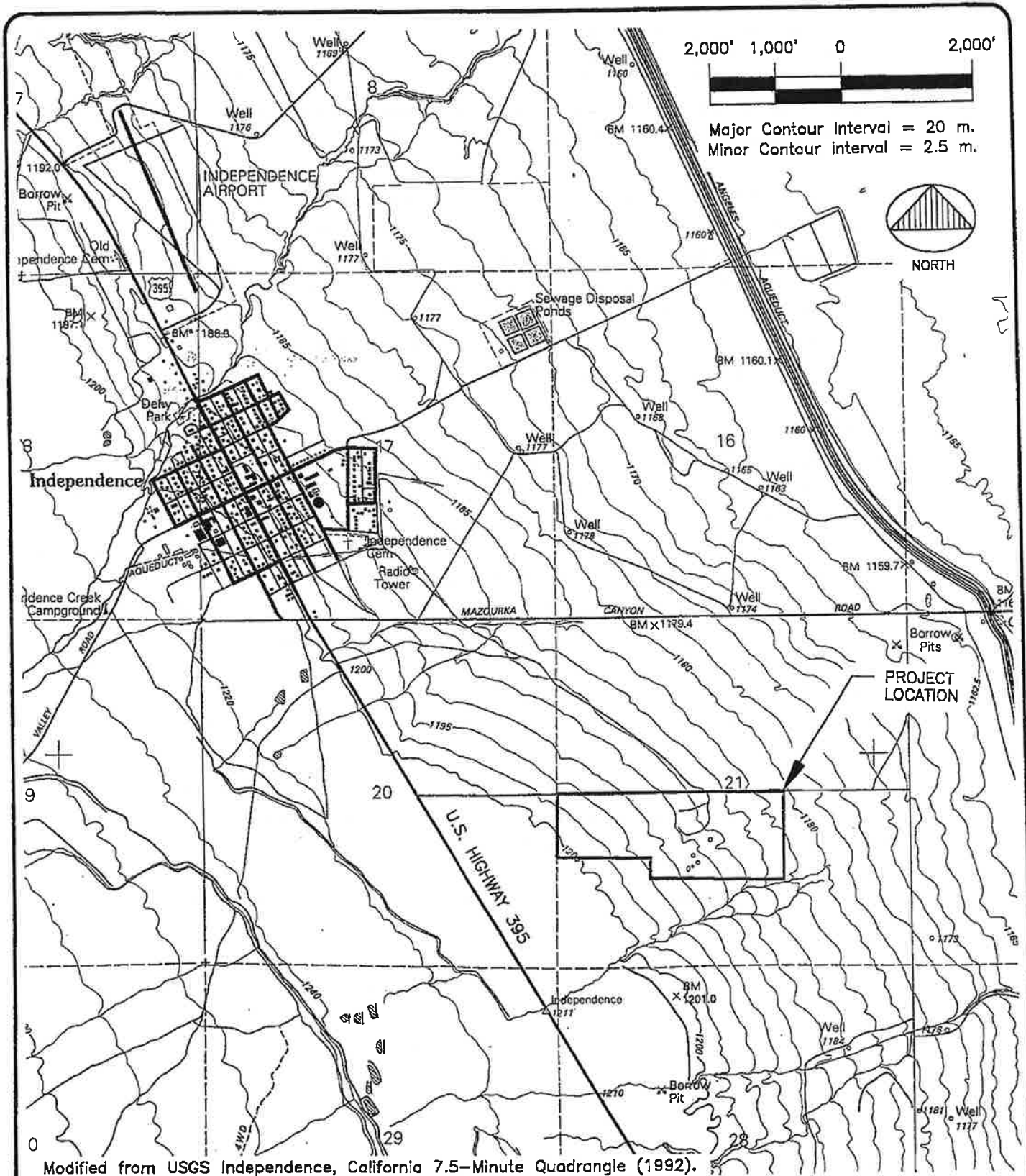
The landfill currently operates under Solid Waste Facilities Permit #14-AA-0004, issued by the Inyo County Health Department and the California Integrated Waste Management Board in February, 1979. The site also operates under Revised Waste Discharge Requirements (Board Order 6-95-116) issued by the California Regional Water Quality Control Board, Lahontan Region. The site is operated by Inyo County Integrated Waste Management, under a lease agreement and Use Permit issued by the Los Angeles Department of Water and Power (LADWP), the current land-owner of the parcel upon which the site is located.

2.2 Detailed Project Description

Although the Independence Landfill currently operates in compliance with State Minimum Standards, the permit under which site operations are authorized is not consistent with current site conditions nor with state solid waste regulations. The proposed project will result in the issuance of a Revised Solid Waste Facilities Permit for the site, which will stipulate site-specific operational requirements and limitations that are current with existing solid waste regulations. The site operator has prepared a *Report of Disposal Site Information* and a *Preliminary Closure and Post-Closure Maintenance Plan*, which present current operations information and the proposed design and procedures for ultimate closure and post-closure maintenance of the site. In



Project #: 103-01.08 Date: 4/15/99 Designed By: CEN Drawn By: CEN Approved By: CEN	ENVIRONMENTAL RESOURCES INTERNATIONAL CARSON CITY, NV (775) 883-5557	PRELIMINARY CLOSURE PLAN INDEPENDENCE LANDFILL INYO COUNTY, CALIFORNIA SITE LOCATION MAP	FIGURE 1
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Project #: 103-01.08

Date: 4/15/99

Designed By: CEN

Drawn By: CEN

Approved By: CEN

**ENVIRONMENTAL
RESOURCES
INTERNATIONAL**

CARSON CITY, NV (775) 883-5557

**PRELIMINARY CLOSURE PLAN
INDEPENDENCE LANDFILL
INYO COUNTY, CALIFORNIA
SITE VICINITY MAP**

FIGURE

2

addition to being required by state solid waste regulations, these plans provide supporting documentation for the revised solid waste facilities permit.

Substantial changes in operational procedures and environmental monitoring practices have occurred at the site since issuance of the 1979 permit. These include installation of perimeter fencing and an entrance gate, limited hours of operation, presence of a gate attendant during operating hours, routine application of a tarp system as an alternative daily cover, compaction of daily cover soil on days when the tarp is not implemented, and establishment of a load-checking program. Environmental controls include installation and routine sampling of monitoring wells for ground water and landfill gas, and construction of a storm water retention basin.

An engineered final closure design has been developed for the site as part of the permit revision process. In general, future disposal operations will be contained within the existing waste footprint, with future disposal capacity provided through vertical fill over existing grades. Although this design represents a reduction in disposal capacity from current permit conditions, the expected site life has been increased by 22 years, primarily through implementation of a tarp system as an alternative daily cover. The difference between current and proposed capacities is due to a previous planning assumption that site operations would continue as a series of disposal trenches and above-grade fill within the full permitted landfill boundaries. However, following promulgation of Subtitle D, fiscal constraints will essentially limit the County from expanding laterally and require that site operations remain within existing footprints. Existing and proposed site grading, including cross-sectional views, are presented in figures enclosed in Attachment A.

Table 1, below, presents the current and proposed disposal capacity data and site life estimates for the Independence Landfill. It should be noted that capacity data represents the total fill space available, or the aggregate quantities of solid waste and cover soil, but not final cover volumes.

TABLE 1
Existing and Proposed Permit Conditions
Independence Landfill - Inyo County, California

Description	Current	Proposed
Permitted Site Capacity ¹	746,873 cu. yds.	317,888 cu. yds.
Remaining Site Capacity ¹	558,175 cu. yds.	129,190 cu. yds.
Estimated Remaining Site Life	18 years	40 years
Estimated Year of Closure	2016	2038

¹ Volume of waste and cover soil only; does not include final cover.

SECTION 3.0

EXISTING ENVIRONMENTAL CONDITIONS

The following section provides a brief description of existing environmental conditions at the location for the proposed project. The discussion addresses the quality of the general environmental categories of air, water, soil, and noise. In addition, the narrative includes discussions of existing conditions of, and potential impact on, local public resources such as public services, land use planning, utilities, and transportation. The discussions presented in this section are intended to provide supporting information to the responses included in the environmental checklist presented in Section 5.0 of this study.

3.1 Air Quality

Baseline air quality data has not been specifically developed for the project site. Staff from the Great Basin Unified Air Pollution Control District indicate that operations at the Independence Landfill is of minimal concern to regional air quality issues and that the air basin is in compliance with all state ambient air quality standards. Current and future air emissions may include: dust generated from wind and vehicles traveling over site surfaces and roads, or from daily cover excavation activities; vehicle and equipment emissions; and, landfill gas emissions.

Periodic application of water to site surfaces is the only method of dust control currently employed at the site. A water trailer stationed at the landfill is utilized on an as-needed basis to sprinkle site surfaces and roads to suppress dust generation. Water is obtained from a local production well. It is anticipated that this method will continue to be utilized by the County in the future.

Vehicles accessing the Independence Landfill are not currently considered to be a significant emissions source, nor are they expected to significantly increase under future conditions. As many as 25 to 30 vehicles may currently access the site on a given day. Private self-haul customers account for the majority of vehicle trips to the landfill. Vehicles idle at the entrance gate when addressed by the gate keeper, and travel time within landfill boundaries is less than a minute. Engines are turned off when customers unload at the working face.

Heavy equipment briefly operate at the site on days of landfill operation. Heavy equipment consists of a wheel loader, bulldozer, and dump truck. Operation of heavy equipment is intermittent, typically limited to one or two hours at the end of the operating day when waste is compacted and, on limited days, when daily cover is excavated, hauled, and compacted at the working face. Air emissions as a result of heavy equipment operation is considered to be insignificant under both current and future conditions.

Gaseous emissions are generated as the by-product of the biological processes that naturally decompose solid waste. These emissions primarily consist of methane and carbon dioxide. The principal concerns with landfill gas are the potential for explosion and the generation of air pollutant precursors. In compliance with state solid waste regulations, the site is equipped with landfill gas monitoring probes. These probes, located around the perimeter of the active cell, are sampled on a semi-annual basis to provide an early warning of potential gas migration. To this date, concentrations of methane have not been detected in perimeter wells. Because of the relatively small mass of waste that will ultimately be in place at the site, landfill gas generation is expected to remain insignificant.

3.2 Water Quality

Water quality concerns at the Independence Landfill consist of both ground water and surface water. Measures have been implemented at the site to minimize the potential environmental impact that landfill operations may have on each of these, both for current and future activities.

3.2.1 Ground Water

The Independence Landfill is subject to strict Waste Discharge Requirements (WDR's) issued by the Lahontan Regional Water Quality Control Board (RWQCB). A quarterly ground water monitoring and reporting program has been implemented, and the existing monitoring system consists of one up-gradient well and three down-gradient wells. The up-gradient well provides samples for background water quality, and samples from down-gradient wells ostensibly provide an indication of any change to ground water quality after it has passed below the landfill. Samples obtained during each monitoring event are analyzed for a combination of organic and inorganic constituents, in accordance with the provisions of site WDR's. To date, the detection monitoring program indicates that the Independence Landfill has not impacted ground water. Although depth and direction of the aquifer fluctuates over time, the depth to ground water generally ranges between 67 feet at the shallowest point to 108 feet at the deepest, and direction of flow is approximately to the northeast at a gradient of 0.0008 feet/foot.

Current and potential beneficial uses identified for ground water underlying the project site include: municipal and domestic supply; agricultural supply; industrial service supply; fresh water replenishment; and, wildlife habitat. Measures implemented to minimize the potential for leachate generation, and thus, ground water impact include: application and compaction of daily cover soil to minimize direct rain water infiltration, load checking to discourage or eliminate disposal of hazardous and liquid wastes, and compaction and grading of site surfaces to promote lateral drainage.

3.2.2 *Surface Water*

Surface water controls have been implemented at the landfill to control and contain storm water and divert it away from the waste mass. During preparation of site design documents, a hydrologic analysis was performed and drainage facilities were designed to handle the 100-year, 24-hour storm event. A network comprised of open channels and retention basins have been constructed to intercept storm water flows and safely route them around the site. Flows that are not retained on-site in a basin are discharged off-site into natural drainage channels downstream. Berms are installed around the working face to contain water that has potentially come into contact with waste. Existing drainage facilities will be augmented in the future as the site develops.

No surface water bodies exist at the site, nor do any natural streams, creeks, or rivers cross site boundaries. Average annual precipitation is approximately 6.0 inches, and evaporation averages an estimated 80 inches per year. The site is in compliance with solid waste location restrictions with respect to floodplains. According to published Community Panel Maps prepared for the unincorporated areas of Inyo County by the Federal Emergency Management Agency, the site is located in an area designated Zone C, which is defined as areas of minimal flooding.

3.3 *Geology, Soils, and Minerals*

Sedimentary soils primarily composed of sands, gravels, and silts underlie the Independence Landfill. The site is located at the toe of a broad, gently-sloping alluvial fan elevated approximately 160 feet above the Owens Valley floor. Site soils have been classified as well-graded sand with gravel and silt. Permeability ranges between moderate to high. Known significant mineral resources have not been identified at site.

3.4 *Noise*

Noise generation at the landfills is confined to that generated while unloading waste from vehicles and the periodic operation of heavy equipment. Operation of heavy equipment is typically limited to one or two hours during daylight, commonly at the conclusion of each operating day. Sound levels are negligible at site boundaries. The facility is located in an undeveloped area of unincorporated Inyo County, approximately one mile southeast of Independence town limits; negligible development exists within one mile from site boundaries.

Future noise levels are anticipated to remain the same as existing conditions. Project activities will not result in noise levels in excess of established standards or ordinances.

3.5 *Biological Resources*

The Inyo County Water Department conducted a vegetation characterization study at the Independence Landfill in 1994. The conclusion of the study was that the site is largely disturbed

and essentially barren of vegetative growth. Adjacent parcels have active plant communities, typically dominated by upland species. No listed endangered, threatened, or wetland species were identified as occurring on, or immediately adjacent to, the landfill site.

No detailed, site-specific studies have been conducted with respect to fauna at, or in the immediate vicinity of, the project site.

3.6 Cultural Resources

No known sites of archaeological, cultural, historical, or paleontological significance have been identified on, or immediately adjacent to, the Independence Landfill.

3.7 Land Use and Zoning

Operation of the project site as a landfill is consistent with the Inyo County General Plan and compatible with all applicable zoning and land use plans and policies. The site is consistent with surrounding land uses, as identified in the Land Use Element of the General Plan. See Section 1.0 of this study for a detailed discussion of land use and zoning designations. Future operation of the site as a landfill is not expected to change its existing status.

3.8 Public Facilities and Services

The Independence Landfill is served by a local, asphalt-paved road extending from U.S. Highway 395. The paved access road converts to an all-weather gravel road once on-site. As stated in Section 3.1 of this study, the volume of vehicular traffic is relatively low at the site. Existing roads are adequate for current and future anticipated vehicle loads.

Project activities will not require the modification, addition, improvement, or expansion of any existing public services or infrastructure. Emergency services will not be impacted by the project. Housing and population trends will not be influenced by project activities.

SECTION 4.0

EVALUATION OF ENVIRONMENTAL IMPACTS

The environmental evaluation process, as presented by the checklist in Section 5.0, considers the proposed project conditions such that the maximum potential environmental effects can be determined. The purpose of the evaluation and checklist is to identify any potentially significant impacts that the project may have on the environment, and discuss applicable mitigation measures. Responses are substantiated by summarizing the assessment of significant impacts, as described in Section 3.0 of this study, and referencing documents utilized in research. References are listed in Section 6.0. If necessary, quantification of anticipated changes caused by the proposed project's development at maximum build-out, with respect to existing conditions, are included. Below is a description of the definitions and specifics that guide the evaluation process.

1. A brief explanation is required for all answers except those with a "No Impact" response which is adequately supported by the information sources cited following each question. A "No Impact" response is considered adequately supported if the referenced sources show that the impact simply does not apply to projects such as the project involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained when it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made and no mitigation measures are proposed, or if more analysis is needed, an EIR is required.
4. "Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from previous analyses may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration.
6. For potential impacts, references to information sources (e.g., general plan, ordinances) should be incorporated into the checklist. Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

SECTION 5.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
5.1 AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista? <i>No scenic resources or standards are established at, or in the immediate vicinity of, the project site. The site is not visible from U.S. Highway 395 or the town of Independence. Vertical expansion of the landfill will not have an impact on views of the Sierra Nevada or White mountains from the highway.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? <i>No scenic resources or standards are established at, or in the immediate vicinity of, the project site.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings? <i>The proposed project will have the same visual character as the existing site and its surroundings. Following closure, the site will be reclaimed to the adjacent open space characteristics. Vertical expansion may result in a less-than-significant impact to aesthetics of the immediate area during active filling operations.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? <i>All project activities are limited to daylight hours only; no light or glare will result from project activities.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.2 AGRICULTURAL RESOURCES. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? <i>No. The project site is an existing landfill. The Farmland Mapping and Monitoring Program does not identify any Farmland resources in Inyo County.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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5.2 AGRICULTURAL RESOURCES, Continued...

Would the project:

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

☐ ☐ ☐ ☒

The project site is owned by the City of Los Angeles and leased by Inyo County. The site is not under a Williamson Act contract. The project site is in compliance with the County General Plan and consistent with surrounding land uses.

- c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

☐ ☐ ☐ ☒

No. The project site is an existing landfill and is not located on, nor will it affect or impact, Farmland.

5.3 AIR QUALITY. Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?

☐ ☐ ☐ ☒

No. Status of Air Quality Plan will not be affected.

- b) Violate any air quality standard or substantially contribute to an existing or projected air quality violation?

☐ ☐ ☒ ☐

Great Basin Unified Air Pollution Control District staff indicate that existing and proposed landfill operations are not a significant contributor to regional air quality degradation. Great Basin staff also indicate that the project site is in compliance with federal and state ambient air quality standards.

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

☐ ☐ ☒ ☐

The project site is not located within a federal or state non-attainment area for criteria pollutants. Application of daily cover soil and dust control measures reduce any potential impact to less-than-significant.

- d) Expose sensitive receptors to substantial pollutant concentrations?

☐ ☐ ☐ ☒

No. See comment in response to 5.3(a).

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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5.3 AIR QUALITY, Continued... Would the project:

- e) Create objectionable odors affecting a substantial number of people? ☐ ☐ ☒ ☐

The project site is located in an undeveloped area of unincorporated Inyo County. The site is approximately one mile from town limits, with negligible residential development within one mile. Application of daily cover acts to suppress generation of objectionable odors. Waste disposal quantities are minimal; therefore, odor generation is not considered significant. No public complaints have been registered with the County with respect to odor.

5.4 BIOLOGICAL RESOURCES. Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? ☐ ☐ ☐ ☒

No evidence of any candidate, sensitive, or special status species has been observed on, or in the immediate vicinity of, the project site.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? ☐ ☐ ☐ ☒

No evidence of riparian habitat or other sensitive natural communities are in evidence on, or in the immediate vicinity of, the project site.

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? ☐ ☐ ☐ ☒

No wetlands are in evidence on, or in the immediate vicinity of, the project site.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? ☐ ☐ ☒ ☐

No significant resident habitat or migratory corridors are in evidence on, or in the immediate vicinity of, the project site. The potential impact on wildlife movement is considered to be a less-than-significant level.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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5.4 BIOLOGICAL RESOURCES, Continued...

Would the project:

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is operated in compliance with all local policies and ordinances.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is operated in compliance with all local conservation plans.

5.5 CULTURAL RESOURCES. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

There is no information that historical resources exist on, or in the immediate vicinity of, the project site.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Sec. 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

There is no information that archaeological resources exist on, or in the immediate vicinity of, the project site.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

There is no information that paleontological resources or unique geologic features exist on, or in the immediate vicinity of, the project site.

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

No burial sites or religious or sacred uses are known to have occurred on the project site.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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5.6 GEOLOGY AND SOILS. Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

No. Although the project site is within Seismic Zone IV (greatest potential for seismic activity), no known active faults are located on the landfill site. In addition, the relatively flat surrounding terrain, mild landfill slopes, cohesive waste mass, and lack of structures minimize the potential for substantial adverse effects. The site is located outside known earthquake fault zones as shown on the most recent Alquist-Priolo Earthquake Fault Zoning maps

- | | | | | |
|------------------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|------------------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|

Proposed landfill slopes and features were analyzed and designed to withstand seismic loading conditions without significant failure. Landfill slopes have been designed flatter (4:1) than normal (3:1) as a result of a slope stability analyses; this will minimize potential impact.

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Soils at the site primarily consist of granular sands with some gravel and silt content. Unstable soils and soils subject to liquefaction are not in evidence in site bore logs, excavations, or surfaces. No surface water bodies exist on-site, and depth to ground water ranges between 67 feet and 108 feet below ground surface.

- | | | | | |
|-----------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

The landfill is located on a relatively level, flat site. Proposed landfill slopes and features are analyzed and designed to withstand seismic loading conditions without significant failure.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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5.6 GEOLOGY AND SOILS, Continued...

Would the project:

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|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <i>Some erosion will occur following precipitation events as a result of exposed surfaces and soil characteristics. Measures have been implemented at the site, such as compacting soil surfaces and installing retention basins and/or berms, to minimize erosion and the quantity of suspended solids discharged off-site. Following closure, the site will be revegetated to minimize erosion.</i> | | | | |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>Soils at the project site primarily consist of granular sands with some gravel and silt content. Unstable soils or geologic units are not in evidence in site bore logs, excavations, or surfaces. The landfill is located on a relatively level, flat site. Minor subsidence may occur in localized areas on the waste mass due to natural biological degradation processes, but permit conditions require that all surface depressions be repaired and graded to ensure drainage of surface water.</i> | | | | |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>Soils at the project site primarily consist of granular sands with some gravel and silt content. Expansive soils are not in evidence in site bore logs, excavations, site surfaces, or results of geotechnical testing of on-site soil samples.</i> | | | | |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>The use of septic tanks or alternative waste water disposal systems is not proposed at the project site.</i> | | | | |

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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5.7 HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

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|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

Disposal of hazardous materials is strictly prohibited by permit conditions for the project site. Mitigation measures have been implemented to detect and discourage hazardous waste disposal, including gate attendants and a load-checking program.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

See preceding comment.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Hazardous materials are strictly prohibited at the project site. The landfill is located more than one mile from any existing or proposed school.

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Be located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Sec. 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The landfill site associated with this project is not on any list of hazardous materials sites.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The landfill location and operation is consistent with the County's adopted Airport Comprehensive Land Use Plan and the Independence Airport Master Plan. The project site is located approximately 1.9 miles from the Independence Airport. The bird population at the project site is negligible. Potential for a substantial safety hazard as a result of landfill operations is considered less than significant.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

See preceding comment.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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5.7 HAZARDS AND HAZ. MATERIALS, Continued...

Would the project:

- g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☐ ☒

In no way will the project site impact, interfere, or impair an emergency response or evacuation plan.

- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? ☐ ☐ ☐ ☒

The project site is located in an undeveloped area of unincorporated Inyo County, approximately one mile from town limits, with negligible residential development located within one mile. The large areas of bare soil cover on site surfaces and roads will inhibit, rather than enhance, fire propagation.

5.8 HYDROLOGY AND WATER QUALITY.

Would the project:

- a) Violate any water quality standards or waste discharge requirements? ☐ ☒ ☐ ☐

The project site is subject to strict Waste Discharge Requirements issued by the Lahontan Regional Water Quality Control Board. A quarterly ground water monitoring and reporting program has been implemented at the landfill. Mitigation measures implemented to minimize the potential for leachate generation, and thus, ground water impact include application and compaction of daily cover soil, load checking, and compacting and grading surfaces to promote lateral drainage.

- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? ☐ ☐ ☐ ☒

Ground water production is not proposed for this project, nor will the site interfere with ground water recharge.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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5.8 HYDROLOGY AND WATER QUALITY, Continued...

Would the project:

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project will not result in the course alteration of any streams or rivers. The project site is a landfill that has been in existence for 34 years. As a result, localized drainage patterns have been established. Measures have been implemented, such as compacting soil surfaces and installing a retention basin, to minimize erosion and the quantity of suspended solids discharged off-site. Upon closure, the site will be revegetated to minimize erosion.

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project will not result in the course alteration of any streams or rivers. The project site is a landfill that has been in existence for 34 years. As a result, localized drainage patterns have been established. Drainage controls have been implemented at the project site, including installation of a retention basin.

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The capacity of off-site drainage systems will not be exceeded at the project site. Drainage controls have been analyzed, designed, and implemented at the site, including installation of a retention basin. The site is located in an undeveloped area of unincorporated Inyo County. Adjacent parcels are undeveloped open space with natural drainage paths. The only pollutant potentially expected to be present in storm water discharged from sites are suspended solids. Grading at the working face contains storm water that has come into contact with waste.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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5.8 HYDROLOGY AND WATER QUALITY, Continued...

Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| f) Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <i>There is a potential that leachate generated at the site could reach and impact ground water. However, the project site is subject to strict Waste Discharge Requirements issued by the Lahontan Regional Water Quality Control Board. A quarterly ground water monitoring and reporting program has been implemented at the landfill. Mitigation measures implemented to minimize the potential for leachate generation, and thus, ground water impact include application and compaction of daily cover soil, load checking, and compacting and grading surfaces to promote lateral drainage.</i> | | | | |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>No. Housing construction is not proposed for this project.</i> | | | | |
| h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>No. Installation of structures is not proposed for this project, nor is the site located within a 100-year flood hazard area.</i> | | | | |
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>The existing landfill site is located outside areas of flood inundation as shown on inundation maps on file in the Inyo County Planning Department.</i> | | | | |
| j) Result in inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>No. The project site will have no potential for inundation by any of the above-mentioned events.</i> | | | | |

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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5.9 LAND USE AND PLANNING. Would the project:

- a) Physically divide an established community? ☐ ☐ ☐ ☒

No. The project site is located in an undeveloped area of unincorporated Inyo County, approximately one mile from town limits, with negligible residential development located within one mile.

- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? ☐ ☐ ☐ ☒

No. Landfill operations at the project site are in compliance with the County General Plan and all applicable zoning and land use plans and policies. The site is consistent with surrounding land uses.

- c) Conflict with any applicable habitat conservation plan or natural community conservation plan? ☐ ☐ ☐ ☒

No. The project site is an existing landfills. No conservation plans have been identified on, or immediately adjacent to, the project site.

5.10 MINERAL RESOURCES. Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? ☐ ☐ ☒ ☐

Saleable minerals (decomposed granite) are located on, and in the immediate vicinity of, the project site. The Inyo County Public Works Department utilizes material excavated from a borrow pit located on-site for its own construction purposes. Use of this material on-site for daily cover soil will limit the quantity available for other County uses.

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? ☐ ☐ ☒ ☐

No locally-important mineral resource recovery sites are identified on the project site. Decomposed granite mining occurs on-site. The project site is in compliance with the County General Plan and is consistent with surrounding land uses.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
5.11 NOISE. Would the project result in:				
a) Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or other applicable local standards? <i>Project activities will not result in noise levels in excess of established standards or ordinances. Noise generation will be confined to periodic operation of heavy equipment (bulldozer and dump truck) during daylight hours, typically limited to one or two hours per operating day at the site. Sound levels are expected to be negligible at site boundaries. The project site is located in an undeveloped area of unincorporated Inyo County, approximately one mile from town limits, with negligible development within one mile.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? <i>The preceding comment also applies to vibration. Personnel operating on-site heavy equipment will be provided with appropriate noise attenuation devices.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? <i>Ambient noise levels will remain the same as under existing conditions should the project be approved. See comment in response to 5.11(a).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? <i>Ambient noise levels will remain the same as under existing conditions should the project be approved. See comment in response to 5.11(a).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? <i>No. The project site is located approximately 1.9 miles from the Independence Airport. See comment 5.11(a).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? <i>No. See preceding comment.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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5.12 POPULATION AND HOUSING. Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? ☐ ☐ ☐ ☒

No. The project is not anticipated to influence regional growth in any way.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? ☐ ☐ ☐ ☒

No. This project will not impact existing housing.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? ☐ ☐ ☐ ☒

No. This project will not displace any residents.

5.13 PUBLIC SERVICES. Would the project:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of these public services:

- i) Fire protection? ☐ ☐ ☐ ☒
- ii) Police protection? ☐ ☐ ☐ ☒
- iii) Schools? ☐ ☐ ☐ ☒
- iv) Parks? ☐ ☐ ☐ ☒
- v) Other public facilities? ☐ ☐ ☐ ☒

No. The project will not impact, nor require improvement of, any governmental facilities.

5.14 RECREATION. Would the project:

- a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? ☐ ☐ ☐ ☒

No. This project will not impact, or influence use of, existing or planned parks or recreational facilities.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
5.14 RECREATION, Continued...				
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? <i>No. The project does not involve recreational facilities.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.15 TRANSPORTATION/TRAFFIC. Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? <i>No. Traffic volume and patterns related to the project are expected to essentially remain the same as existing conditions. Although traffic may increase as the area grows, the potential volume will be minimal and impact is considered negligible. Existing roads are adequate to accommodate existing traffic levels.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways? <i>No. See preceding comment.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? <i>No. The project is not expected to impact air traffic.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? <i>No. Site design includes provisions for appropriate road slope, width, surface, and curve conditions.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access? <i>No. Access will remain the same as existing conditions.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Result in inadequate parking capacity? <i>No. Parking will remain the same as existing conditions.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)? <i>No. The project will not generate pedestrian or bicycle traffic, nor impact transportation policies, plans, or programs.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
5.16 UTILITIES AND SERVICE SYSTEMS.				
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>No. The project does not involve wastewater treatment.</i>				
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>No. The project will not require the construction or improvement of any water or wastewater facilities. Water is periodically applied to soil surfaces for dust control at each site as needed. Water is obtained from local sources and hauled by a water truck. Future conditions will remain the same as existing.</i>				
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>No. See comments 5.8(c), (d), and (e).</i>				
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Existing local water supplies are sufficient to meet future needs on-site. See comment in response to 5.16(b).</i>				
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>No. Project activities will not significantly impact any wastewater treatment facilities. The site is equipped with a toilet for employee use only. Future needs are expected to be equivalent to existing conditions.</i>				
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Yes. The project landfill provides sufficient disposal capacity for current and future community needs.</i>				
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Yes. The project site operates in compliance with applicable regulations.</i>				

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
--	--------------------------------------	--	------------------------------------	--------------

5.17 MANDATORY FINDINGS OF SIGNIFICANCE:

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

☐ ☒ ☐ ☐

The project will not impact wildlife, fish, plant, or historical resources of the area. There is potential, considered less than significant, that leachate may be generated at a project site which could then migrate to and impact underlying ground water. The project site is subject to strict Waste Discharge Requirements issued by the Lahontan Regional Water Quality Control Board. A quarterly ground water monitoring and reporting program has been implemented at the landfill. Mitigation measures intended to minimize the potential for leachate generation, and thus, ground water impact include application and compaction of daily cover soil, load checking, and grading surfaces to promote lateral drainage.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

☐ ☐ ☐ ☒

No.

- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

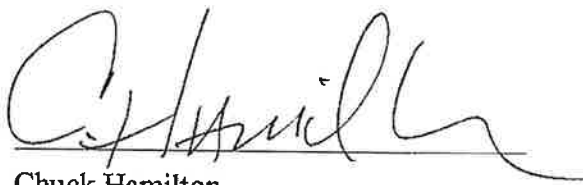
☐ ☐ ☐ ☒

No. The purpose of the project is to ensure that sufficient disposal capacity and an environmentally-sound disposal method is available to the community of Independence..

SECTION 6.0
DETERMINATION BASED ON
ENVIRONMENTAL EVALUATION

On the basis of this Initial Study environmental evaluation:

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

Signature: 

Name: Chuck Hamilton

Title: Deputy County Administrator

Date: April 16, 1999

SECTION 7.0 REFERENCES

PERSONS AND AGENCIES CONSULTED IN PREPARATION OF THIS STUDY

- California Department of Fish and Game (Bishop, Ca.)
Mr. Bruce Kinney, Environmental Specialist
- Great Basin Unified Air Pollution Control District (Bishop, Ca.)
Ms. Ellen Hardebeck, Air Pollution Control Officer
- Inyo County Integrated Waste Management (Bishop, Ca.)
Mr. Chuck Hamilton, Deputy County Administrator
- Inyo County Planning Department (Independence, Ca.)
Mr. Chuck Thistlethwaite, County Planner
- Lahontan Regional Water Quality Control Board (Victorville, Ca.)
Mr. Chris Maxwell, Engineering Geologist

DOCUMENT REFERENCE

Buckhorn Geotech, 1989b, *Solid Waste Assessment Test Proposal, Independence Sanitary Landfill*: unpublished report prepared for Inyo County Integrated Waste Management by Buckhorn Geotech, Inc., Montrose, Colorado, April 21, 1989.

California Department of Conservation, 1997, *Special Publication 42: Fault-Rupture Hazard Zones in California*: California Department of Conservation, Division of Mines and Geology, Sacramento, California, 1997.

California Department of Conservation, 1998, *Extent of Important Farmland Map Coverage*: California Department of Conservation, Division of Land Resources Protection, Sacramento, California, December 30, 1998.

California Department of Fish and Game, 1999a, *State and Federally Listed Endangered, Threatened, and Rare Plants of California*: California Department of Fish and Game, Habitat Conservation Division, Sacramento, California, January 12, 1999.

California Department of Fish and Game, 1999b, *State and Federally Listed Endangered and Threatened Animals of California*: California Department of Fish and Game, Habitat Conservation Division, Sacramento, California, January 1999.

California Regional Water Quality Control Board, 1995, *Board Order No. 6-95-116, Revised Waste Discharge Requirements for the Independence Class III Landfill*: California Regional Water Quality Control Board, Lahontan Region, June 8, 1995.

Environmental Resources International, 1999, *Preliminary Closure and Postclosure Maintenance Plan for the Independence Landfill*: unpublished report prepared for Inyo County Integrated Waste Management by Environmental Resources International, LLC, Carson City, Nevada, April 1999.

Environmental Resources International, 1999, *Report of Disposal Site Information for the Independence Landfill*: unpublished report prepared for Inyo County Integrated Waste Management by Environmental Resources International, LLC, Carson City, Nevada, April 1999.

Federal Emergency Management Agency (FEMA), 1985, *Flood Insurance Rate Map: Inyo County, California - Unincorporated Areas, Community Panels: 060073-1075-B, 060073-0225-B, 060073-0850-B, 060073-2650-B, 060073-2375-B*, U.S. Department of Housing and Urban Development, Federal Emergency Management Agency, Washington, D.C., September 4, 1985.

Inyo County Planning Department, 1979, *Seismic Safety Element of the Inyo County General Plan*: Inyo County Planning Department, Independence, California, April 1979.

Inyo County Planning Department, 1982, *Safety Element of the Inyo County General Plan*: Inyo County Planning Department, Independence, California, January 12, 1982.

Inyo County Planning Department, 1984, *Land Use Element of the Inyo County General Plan*: Inyo County Planning Department, Independence, California, 1984.

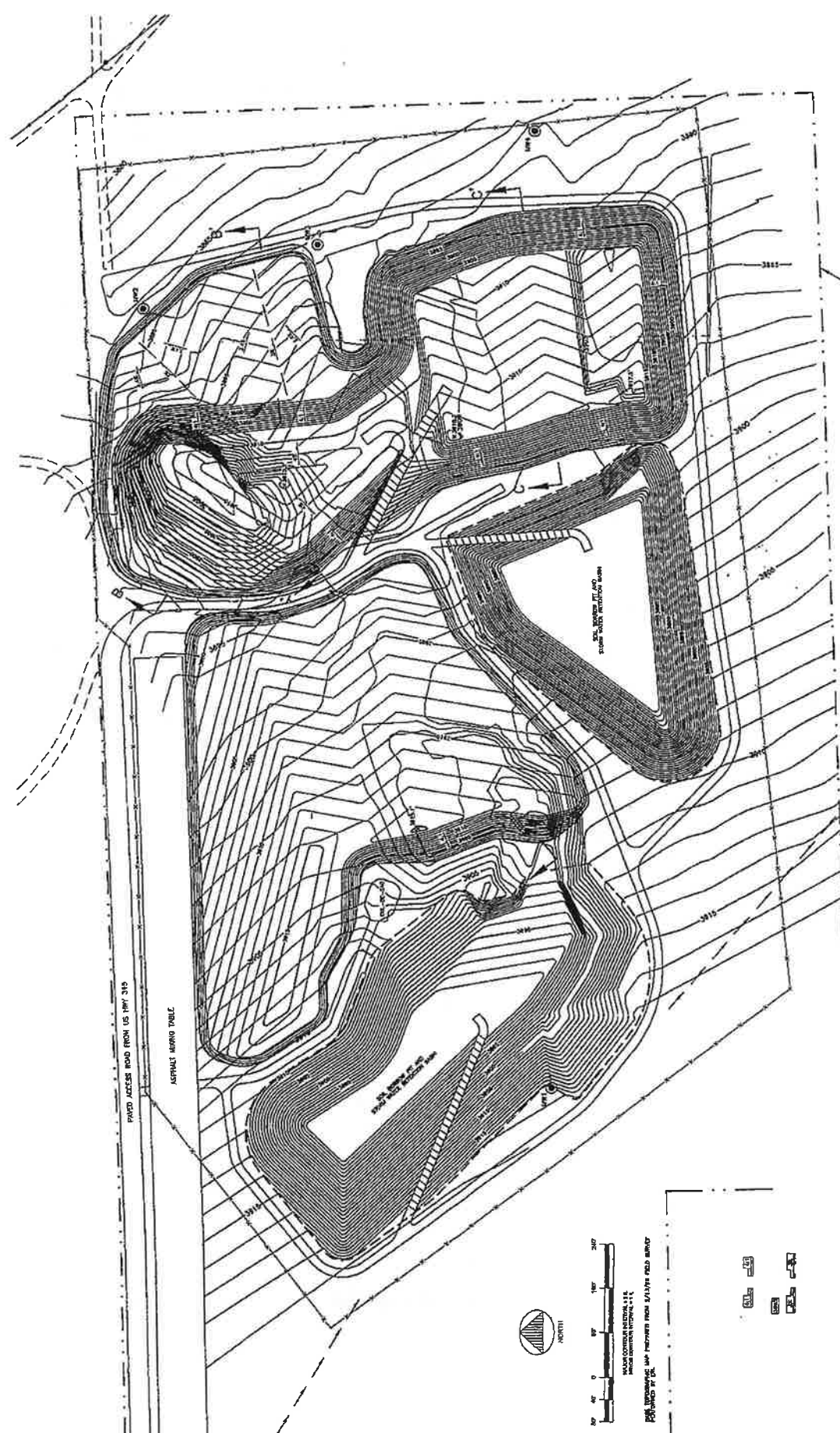
Inyo County Public Works Department, 1988, *Inyo County Solid Waste Gas Monitoring Plan*: unpublished report prepared by the Inyo County Public Works Department, Independence, California, October 19, 1988.

Inyo County Water Department, 1995, *Characterization of Vegetation, Hydrology, and Soils, Inyo County Landfill Sites*: unpublished report prepared by the Inyo County Water Dept., 1995.

A T T A C H M E N T

A

Site Maps - Existing and Proposed Conditions



EXISTING LOT 100 (SEE FULL SCALE, THIS SHEET)

PRELIMINARY CLOSURE & POSTCLOSURE PLAN
INDEPENDENCE LANDFILL
 INYO COUNTY, CALIFORNIA

3
 PROJECT NO.
 100-01-00

ENVIRONMENTAL RESOURCES INTERNATIONAL
 1000 ROCKWELL AVENUE, SUITE 100
 FORT BRIDGE, CALIFORNIA 94702

FINAL GRADING PLAN

Issue Date: 4/15/94
 Designed By: E. HARRIS
 Drawn By: E. HARRIS
 Reviewed By: E. HARRIS
 Approved By: E. HARRIS

Rev.	Description	Date	By	Appr.
1	ISSUED FOR CONSTRUCTION	4/15/94	E. HARRIS	E. HARRIS

**A
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B

Public Notices, Comments, and Local Approvals

FINAL DOCUMENT DISTRIBUTION LIST

NEGATIVE DECLARATION AND INITIAL STUDY
for the
INDEPENDENCE LANDFILL
Inyo County, California

Agency	No. Copies	Document	Package Type
Inyo County Integrated Waste Management (Bishop)	2	CEQA	Binder
Inyo County Office of the County Clerk (Indy)	1	IS/ND	Comb
Inyo County Planning Commission (Indy)	1	IS/ND	Comb
	8	IS/ND	Loose
Inyo County Dept. of Environmental Health (Bishop)	1	CEQA	Binder
City of Bishop Public Works Dept. (Bishop)	1	IS/ND	Loose
US Dept. of Interior, BLM (Bishop)	1	IS/ND	Loose
US Dept. of Forestry (Bishop)	1	IS/ND	Loose
Local Task Force (remainder)	6	IS/ND	Loose
LA Dept. of Water and Power (Bishop)	1	IS/ND	Comb
Lahontan RWQCB (Victorville)	1	IS/ND	Comb
California Integrated Waste Mgmt Board (Sacto)	1	CEQA	Binder
California Department of Fish and Game (Bishop)	1	IS/ND	Loose
Great Basin Air Pollution Control District (Bishop)	1	IS/ND	Loose
California State Clearinghouse (remainder; copies)	11	IS/ND	Loose
Total Copies:	4	CEQA	Binder
	4	IS/ND	Comb
	30	IS/ND	Loose
ERI Copies:	1	CEQA	Binder
	1	IS	Comb

Abbreviations:

CEQA = All CEQA documentation, including Draft Negative Declaration, Initial Study, public notices, and local approvals.

ND = Draft Negative Declaration.

IS = Initial Study.

Notice of Completion

Appendix F

See NOTE below

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 916/445-0613

SCH #

Project Title: Revised Solid Waste Facilities Permit - INDEPENDENCE LANDFILL

Lead Agency: Inyo Co. Dept. of Health Services

Contact Person: Robert L. Hurd

Street Address: 207 West South Street

Phone: (760) 873-7865

City: Bishop Zip: 93514

County: Inyo

Project Location

Country: Inyo

City/Nearest Community: Independence

Cross Streets: U.S. Highway 395

Total Acres: 90.54

Assessor's Parcel No. n/a

Section: 21 Twp. 13 S. Range: 35 E. Base: MDB&M

Within 2 Miles: State Hwy #: 395

Waterways: L.A. Aqueduct, Inde. Creek, Symmes Cr.

Airports: Independence

Railways: n/a Schools: Indep. Elem. & H.S.

Document Type

CEQA: ☐ NOP

☐ Early Cons

☒ Neg Dec

☐ Draft EIR

☐ Supplement/Subsequent

☐ EIR (Prior SCH No.)

☐ Other

NEPA: ☐ NOI

☐ EA

☐ Draft EIS

☐ FONSI

Other: ☐ Joint Document

☐ Final Document

☐ Other

Local Action Type

☐ General Plan Update

☐ General Plan Amendment

☐ General Plan Element

☐ Community Plan

☐ Specific Plan

☐ Master Plan

☐ Planned Unit Development

☐ Site Plan

☐ Rezone

☐ Prezone

☐ Use Permit

☐ Land Division (Subdivision, Parcel Map, Tract Map, etc.)

☐ Annexation

☐ Redevelopment

☐ Coastal Permit

☒ Other: SWEP

Development Type

☐ Residential: Units _____ Acres _____

☐ Office: Sq.ft. _____ Acres _____ Employees _____

☐ Commercial: Sq.ft. _____ Acres _____ Employees _____

☐ Industrial: Sq.ft. _____ Acres _____ Employees _____

☐ Educational

☐ Recreational

☐ Water Facilities: Type _____ MGD

☐ Transportation: Type _____

☐ Mining: Mineral _____

☐ Power: Type _____ Warts _____

☐ Waste Treatment Type _____

☐ Hazardous Waste: Type _____

☒ Other: Solid Waste - Class III

Project Issues Discussed in Document

☒ Aesthetic/Visual

☒ Agricultural Land

☒ Air Quality

☒ Archeological/Historical

☐ Coastal Zone

☒ Drainage/Absorption

☐ Economic/Jobs

☐ Fiscal

☒ Flood Plain/Flooding

☒ Forest Land/Fire Hazard

☒ Geologic/Seismic

☒ Minerals

☒ Noise

☒ Population/Housing Balance

☒ Public Services/Facilities

☒ Recreation/Parks

☐ Schools/Universities

☐ Septic Systems

☒ Sewer Capacity

☒ Soil Erosion/Compaction/Grading

☒ Solid Waste

☒ Toxic/Hazardous

☒ Traffic/Circulation

☐ Vegetation

☒ Water Quality

☒ Water Supply/Groundwater

☒ Wetland/Riparian

☒ Wildlife

☐ Growth Inducing

☒ Landuse

☒ Cumulative Effects

☐ Other

Present Land Use/Zoning/General Plan Use Present and proposed land use is consistent with County General Plan and all applicable zoning ordinances and land uses.

Project Description

Issuance of a revised solid waste facilities permit in accordance with state solid waste regulations (Title 27, CCR)

NOTE: Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. from a Notice of Preparation or previous draft document) please fill it in.

Revised October 1989

Reviewing Agencies Checklist

KEY

S = Document sent by lead agency

X = Document sent by SCH

✓ = Suggested distribution

Resources Agency

Boating & Waterways

Coastal Commission

Coastal Conservancy

Colorado River Board

Conservation

S Fish & Game

Forestry

✓ Office of Historic Preservation

✓ Parks & Recreation

✓ Reclamation

S.F. Bay Conservation & Development Commission

✓ Water Resources (DWR)

Business, Transportation & Housing

Aeronautics

California Highway Patrol

✓ CALTRANS District # 9

Department of Transportation Planning (headquarters)

Housing & Community Development

Food & Agriculture

Health & Welfare

Health Services

State & Consumer Services

General Services

OLA (Schools)

Environmental Affairs

Air Resources Board

S APCD/AQMD

S California Waste Management Board

SWRCB: Clean Water Grants

SWRCB: Delta Unit

SWRCB: Water Quality

SWRCB: Water Rights

S Regional WQCB # Lahontan - Vict

Youth & Adult Corrections

Corrections

Independent Commissions & Offices

Energy Commission

✓ Native American Heritage Commission

Public Utilities Commission

Santa Monica Mountains Conservancy

✓ State Lands Commission

Tahoe Regional Planning Agency

S Other L.A. Dept. of Water & Power
U.S. Dept. of Interior, BLM

Public Review Period (to be filled in by lead agency)

Starting Date April 19, 1999

Ending Date May 19, 1999

Signature

[Signature]

Date

4-16-99

Lead Agency (Complete if applicable):

Consulting Firm: Environmental Resources

Address: 2500 Boeing Way

City/State/Zip: Carson City, NV 89706

Contact: Evan Nikirk

Phone: (775) 883-5557

Applicant: Inyo Co. Integrated Waste

Address: 785 N. Main St. Ste. J Mgt.

City/State/Zip: Bishop, CA 93514

Phone: (760) 873-5577

For SCH Use Only:

Date Received at SCH

Date Review Starts

Date to Agencies

Date to SCH

Clearance Date

Notes:

Revised October 1989

SECTION IV

FINANCIAL ASSURANCE INFORMATION

INTEGRATED WASTE MANAGEMENT
PARKS & RECREATION
MOTOR POOL



TEL: (760) 873-5577
FAX: (760) 873-5599
E-MAIL: seagan@inyocounty.us

COUNTY OF INYO

INTEGRATED WASTE MANAGEMENT
163 MAY STREET
BISHOP, CALIFORNIA 93514

Aug 15, 2014

Mr. Garth C. Adams, Manager
Financial Assurance Section
Department of Resources, Recycling and Recovery
801 K Street, MS 19-01
Sacramento, CA 95814

Re: Inyo County Landfill Closure Fund Calculations, Recommended Year 2014 Deposits, and Status of Closure Fund Balance

Dear Mr. Adams:

Inyo County hereby presents the attached information for fiscal year (FY) 2013/2014 (Year 2014) annual financial assurance deposit calculations for the Landfill Closure Enterprise Funds. The individual landfill funds ensure that there is reasonably calculated and sufficient funding available for conducting closure operations at the following active landfills:

- Bishop-Sunland Landfill (SWIS # 14-AA-0005)
- Independence Landfill (SWIS # 14-AA-0004)
- Lone Pine Landfill (SWIS # 14-AA-0003)
- Shoshone Disposal Site (SWIS # 14-AA-0006)
- Tecopa Disposal Site (SWIS # 14-AA-0007)

Because a "pledge of revenue" has been established by the County as a post-closure funding mechanism, post-closure costs are not included in these calculations. Similarly, corrective action costs are to be funded through an environmental liability insurance policy provided by the County. Therefore, corrective action costs are also not included.

The period of time assessed is the County's Fiscal Year (FY) 2013/2014, namely July 1, 2013 through June 30, 2014. The following tables are also attached for your information:

- Table 1 – Consumption of Permitted Airspace Used at Inyo County Landfills in FY 12/13
- Table 2 – Bishop-Sunland Landfill Year 2013 Closure Fund Deposit Calculations
- Table 3 – Independence Landfill Year 2013 Closure Fund Deposit Calculations
- Table 4 – Lone Pine Landfill Year 2013 Closure Fund Deposit Calculations
- Table 5 – Shoshone Disposal Site Year 2013 Closure Fund Deposit Calculations
- Table 6 – Tecopa Disposal Site Year 2013 Closure Fund Deposit Calculations

Aug 15, 2014
Mr. Garth C. Adams
Page 2 of 2

Summarized in the table below for each landfill are the calculated 2013 deposit amounts, the required minimum fund balance levels, current actual fund balances (as of June 30th, 2013), and the amount of recommended additional funds the County is depositing into each account. The funds' anniversary dates are August 29th.

Disposal Facility	Required Minimum Fund Balance	Current Fund Balance (6/30/13)⁽²⁾	Deposit to be Made
Bishop-Sunland	\$740,287	\$675,931	\$64,356
Independence	\$410,891	\$391,722	\$19,169
Lone Pine	\$366,348	\$344,440	\$21,908
Shoshone	\$8,222	\$8,340	\$0
Tecopa	\$29,686	\$29,797	\$0
Totals	\$1,555,265	\$1,450,230	\$105,433

(1) Year 2014 annual deposit calculations were estimated based on waste disposal records from 7/1/12 through 6/30/13.

(2) If the "current fund balance" for a given disposal facility is greater than the "required minimum fund balance", no deposit needs to be made.

As shown above, the Shoshone Disposal closure fund balance and the Tecopa Disposal closure fund balance is over-funded; thus, no fund payment is necessary.

Please contact me at (760) 873-5577 if you need any additional information or clarification.

Thank you,



Scott W. Eagan
Integrated Waste Management Superintendent

cc: Kevin Carunchio, Inyo County CAO
Pam Hennarty, Inyo County Deputy CAO
Amy Shephard, Inyo County Auditor-Controller
Noah Campbell-Lund, Geo-Logic Associates

Table 1. Consumption of Permitted Airspace Used at Inyo County Landfills in FY 13/14

Description	3rd Q 2013	4th Q 2013	1st Q 2014	2nd Q 2014	Annual Total
Bishop-Sunland Landfill					
Waste Disposed (tons) ⁽¹⁾	4,342	3,430	2,822	3,163	13,757
Waste Capacity Filled (cy) ⁽²⁾	10,855	8,575	7,055	7,908	34,393
Total Capacity Filled (cy) ⁽³⁾	11,889	9,392	7,727	8,661	37,668
Independence Landfill					
Waste Disposed (tons) ⁽¹⁾	415	379	276	219	1,289
Waste Capacity Filled (cy) ⁽²⁾	1,038	948	690	548	3,223
Total Capacity Filled (cy) ⁽³⁾	1,141	1,042	759	602	3,545
Lone Pine Landfill					
Waste Disposed (tons) ⁽¹⁾	847	649	679	856	3,031
Waste Capacity Filled (cy) ⁽²⁾	2,118	1,623	1,698	2,140	7,578
Total Capacity Filled (cy) ⁽³⁾	2,329	1,785	1,867	2,354	8,335
Shoshone Disposal Site					
Waste Disposed (tons) ⁽¹⁾	0	0	0	0	0
Waste Capacity Filled (cy) ⁽²⁾	0	0	0	0	0
Total Capacity Filled (cy) ⁽³⁾	0	0	0	0	0
Tecopa Disposal Site					
Waste Disposed (tons) ⁽¹⁾	0	0	0	0	0
Waste Capacity Filled (cy) ⁽²⁾	0	0	0	0	0
Total Capacity Filled (cy) ⁽³⁾	0	0	0	0	0

⁽¹⁾Waste disposal data obtained from Inyo County.

⁽²⁾ Assumed in-place density of 800 pcy.

⁽³⁾ Total capacity filled includes waste and cover soil at waste-to-soil ratios identified in the Preliminary Closure and Post Closure Plans. These ratios are 10.5:1 for Bishop-Sunland, 10:1 for Independence and Lone Pine, and 1:1 for Shoshone and Tecopa.

Table 2. Bishop-Sumland Landfill (SWIS #14-AA-0005) Year 2013 Closure Fund Deposit Calculations
Inyo County, California

Description	Symbol	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Inflation Factor (prior year)	I	2.1%	2.2%	1.1%	1.7%	2.1%	2.8%	n/a (2)	2.7%	2.2%	n/a (2)	n/a (2)	n/a (2)	2.1%	1.8%	1.5%
Total Permitted Site Capacity (cy) (3)	TPC	4,039,760	4,039,760	4,039,760	4,039,760	4,039,760	4,500,653	4,500,653	4,500,653	4,500,653	4,500,653	6,016,800	6,016,800	6,016,716	6,016,716	6,016,717
Disposal Capacity Filled (cy) (4)	CF	24,895	24,940	24,601	24,785	24,825	15,723	29,171	33,139	36,581	34,076	43,593	55,909	48,358	36,967	37,668
Remaining Permitted Capacity (cy) (5)	RPC=RPC _{yr} -CF _{yr+1}	3,333,566	3,308,626	3,284,025	3,259,240	3,234,415	4,484,930	4,455,759	4,422,620	4,388,039	4,351,963	4,208,992	4,151,083	4,102,725	4,066,358	4,028,650
Post-93 Disposal Consumption Ratio	CF/RPC	0.00747	0.00754	0.00749	0.00760	0.00768	0.00351	0.00655	0.00749	0.00834	0.00783	0.01036	0.01347	0.01179	0.00894	0.00935
Closure Cost Estimate (6)	C	\$3,289,311	\$3,356,366	\$3,432,271	\$3,470,025	\$3,529,016	\$3,603,125	\$3,704,013	\$3,484,246	\$3,578,321	\$3,657,044	\$3,940,356	\$7,290,164	\$7,443,257	\$7,577,236	\$7,690,895
Postclosure Cost Estimate (7)	PC	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Corrective Action Cost Estimate (8)	CA	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Total Cost Estimate	TC	\$3,289,311	\$3,356,366	\$3,432,271	\$3,470,025	\$3,529,016	\$3,603,125	\$3,704,013	\$3,484,246	\$3,578,321	\$3,657,044	\$3,940,356	\$7,290,164	\$7,443,257	\$7,577,236	\$7,690,895
Minimum Fund Balance Required Pre-Deposit	B _p	\$171,020	\$184,307	\$188,157	\$242,235	\$266,781	\$291,819	\$303,428	\$325,691	\$349,358	\$376,289	\$401,977	\$438,642	\$470,922	\$500,922	\$530,922
Min Calculated Remaining Cost Estimate	C _r =TC-B _p	\$3,118,291	\$3,164,079	\$3,214,114	\$3,227,790	\$3,262,235	\$3,311,306	\$3,400,585	\$3,158,555	\$3,228,963	\$3,280,768	\$3,538,379	\$6,851,522	\$6,912,336	\$6,964,840	\$7,016,209
Required Annual Fund Deposit	FD=(CF/RPC) x C _r	\$23,287	\$23,850	\$24,077	\$24,546	\$25,039	\$25,691	\$26,367	\$23,667	\$25,931	\$28,688	\$36,665	\$92,280	\$81,474	\$62,290	\$65,601
Minimum Fund Balance Required after Deposit	FB=B _p +FD	\$194,307	\$218,158	\$242,235	\$266,781	\$291,819	\$303,428	\$325,691	\$349,358	\$376,289	\$401,977	\$438,642	\$470,922	\$500,922	\$530,922	\$562,523
Minimum Fund Balance Required after Deposit		\$740,287														
Actual Fund Balance Prior to Annual Deposit (6/30/13)		\$675,931														
Difference Prior to Annual Deposit		\$64,356														
Minimum Fund Deposit Required to Bring Fund into Compliance		\$64,356														

(1) Anniversary of fund is August 29th of each year.
(2) Inflation factor not used due to updated costs for closure in Preliminary Closure and Post-Closure Maintenance Plan, PCPCMP (April 2007, September 2009, and July/December 2011).
(3) 1/1/90 disposal capacity was 653,290 cy; footprint expanded in 1990, based on 2,818,916 cy (less 556,710 cy (capacity filled prior to 1990). Total permitted site capacity was recalculated in 1996 to be 2,796,764 cy; in 1999 to be 4,039,760 cy; in 1999 to be 4,039,760 cy; in 2005 to be 4,500,653 cy; and in 2010 to be 6,016,716. The 2010 capacity is based on Wendell Minshew September 2009 capacity estimate (rounded up) in the 2009 PCPCMP.
(4) The 2011 capacity is based on the Wendell Minshew September 2009 capacity estimate (value is not rounded for consistency between documents) in the 2009 PCPCMP.
(5) Capacity filled through June 30, 2012. See Table 1. Disposal capacity filled includes solid waste disposed and space consumed by ADC and soil used as cover. However, for 2005 15,723 cy was consumed in the 1st two quarters
(6) Remaining capacity as of 12/31/04 was recalculated to be 4,500,653 cubic yards; prior to 2004, remaining permitted capacity was as of June 30th. For 2005, 15,723 cy (capacity used in 1st six months of 2005) was deducted from 4,500,653 cy (12/31/04 remaining airspace). The 2010 remaining capacity (remaining airspace) of 4,206,992 cy is based on Minshew September 2009 site capacity estimate in the 2009 PCPCMP of 4,250,585 cy minus 2009/2010 disposal capacity filled of 43,593 cy. The 2011 remaining capacity of 4,151,083 cy is the remaining capacity of 4,206,992 cy minus the 2010/2011 disposal capacity filled of 55,909 cy.
(7) Closure cost estimate was modified in 1/1996, 2/1999, 4/2007, 9/2009, 1/2011 for updated closure plans; in other years the closure cost estimate was updated by inflation index. Cost for 2010 is the value reported from the 2009 PCPCMP prepared by Minshew in September 2009. Cost for 2011 is the value reported from the PCPCMP prepared by Ausenco Vector in July/December 2011.
(8) Inyo County established a "Pledge of Revenue" as the financial mechanism for anticipated postclosure costs.
(9) Inyo County subscribes to an insurance policy w/ environmental liability coverage for corrective action costs.

Table 3. Independence Landfill (SWMS #14-AA-0004) Year 2013 Closure Fund Deposit Calculations
Inyo County, California

Description	Symbol	Year of Deposit Calculation (1)														
		2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Inflation Factor (prior year)	I	2.1%	2.2%	1.1%	1.7%	2.1%	2.8%	n/a (2)	2.7%	2.2%	n/a (2)	n/a (2)	n/a (2)	2.1%	1.8%	1.5%
Total Permitted Site Capacity (cy) (3)	TPC	317,890	317,890	317,890	317,890	317,890	317,890	317,890	270,158	270,158	270,158	695,679	695,679	695,679	695,679	695,679
Disposal Capacity Filled (cy) (4)	CF	2,126	2,673	3,839	3,429	3,020	3,314	4,590	1,186	3,347	3,363	4,488	5,734	5,011	4,744	3,545
Remaining Permitted Capacity (cy) (5)	RPC=RPC ₀ -CF _{yr+1}	127,560	124,677	120,838	117,469	114,989	111,075	108,465	108,299	101,952	98,589	244,376	238,642	233,631	228,887	225,343
Post-93 Disposal Consumption Ratio	CF/RPC	0.01669	0.02144	0.03177	0.02921	0.02640	0.02984	0.04310	0.01126	0.03283	0.03411	0.01837	0.02403	0.02145	0.02073	0.01573
Closure Cost Estimate (6)	C	\$ 979,881	\$1,001,459	\$1,022,469	\$1,033,716	\$1,051,289	\$1,073,366	\$1,103,420	\$1,064,131	\$1,092,863	\$1,116,906	\$1,022,806	\$1,570,022	\$1,602,992	\$1,631,846	\$1,656,324
Postclosure Cost Estimate (7)	PC	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Corrective Action Cost Estimate (8)	CA	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Total Cost Estimate	TC	\$ 979,881	\$1,001,459	\$1,022,469	\$1,033,716	\$1,051,289	\$1,073,366	\$1,103,420	\$1,064,131	\$1,092,863	\$1,116,906	\$1,022,806	\$1,570,022	\$1,602,992	\$1,631,846	\$1,656,324
Minimum Fund Balance Required Pre-Deposit	B _p	\$ 43,635	\$ 59,265	\$ 79,444	\$ 109,403	\$ 136,399	\$ 160,553	\$ 187,787	\$ 227,255	\$ 236,681	\$ 264,788	\$ 293,855	\$ 307,242	\$ 337,584	\$ 364,725	\$ 390,986
Min Calculated Remaining Cost Estimate	C _r = TC-B _p	\$ 936,246	\$ 941,194	\$ 943,025	\$ 924,313	\$ 914,890	\$ 912,813	\$ 915,633	\$ 836,876	\$ 856,182	\$ 852,117	\$ 728,951	\$1,262,780	\$1,265,409	\$1,267,122	\$1,265,338
Required Annual Fund Deposit	FD=(CF/RPC) ₀ x C _r	\$ 15,630	\$ 20,179	\$ 20,960	\$ 26,995	\$ 24,154	\$ 27,234	\$ 39,488	\$ 9,426	\$ 28,108	\$ 29,067	\$ 13,387	\$ 30,342	\$ 27,141	\$ 26,261	\$ 19,904
Minimum Fund Balance Required after Deposit	FB=B _p + FD	\$ 59,265	\$ 79,443	\$ 109,403	\$ 136,398	\$ 160,552	\$ 187,787	\$ 227,255	\$ 236,681	\$ 264,788	\$ 293,855	\$ 307,242	\$ 337,584	\$ 364,725	\$ 390,986	\$ 410,891
Minimum Fund Balance Required after Deposit		\$ 410,891														
Actual Fund Balance Prior to Annual Deposit (6/30/13)		\$ 391,722														
Difference Prior to Annual Deposit		\$ 19,169														
Minimum Fund Deposit Required to Bring Fund into Compliance		\$ 19,169														

- (1) Anniversary of fund is August 29th of each year.
(2) Inflation factor not used due to updated costs for closure in Preliminary Closure and Post-Closure Maintenance Plan (April 2007, September 2009, and September 2011).
(3) 1990 disposal capacity based on 968,000 cy less 221,127 cy (capacity filled prior to 1989). Expansion in 1990; recalculated in 1989 by Evan Nikirk; recalculated by Wendell Minshew, for updated Preliminary Closure and Post-Closure Maintenance Plan (April 2007) to be 270,158 cy as of 12/31/06. The 2010 and 2011 capacity is based on Wendell Minshew, September 2009 capacity estimate in the 2009 PCPCMP.
(4) Through June 30, 2012. See Table 1. Disposal capacity filled includes solid waste disposed and space consumed by ADC and soil used as cover. The 2007 disposal capacity filled was for 1st and 2nd quarters of 2007.
(5) Remaining permitted capacity as of June 30th of year shown. The 2010 remaining capacity (remaining airspace) of 244,376 cy is based on Minshew Engineering's September 2009 capacity estimate in the 2009 PCPCMP of 248,864 cy minus the 2009/2010 disposal capacity filled of 4,488 cy. The 2011 remaining capacity of 238,642 cy is based on the 2010 estimate of 244,376 cy minus the 2010/2011 disposal capacity filled of 5,734 cy.
(6) Closure cost estimate was modified in 1/1996, 2/1999, 4/2007, 9/2009, and 9/2011 for updated closure plans; in other years the closure cost estimate was updated by Inflation index. Cost for 2010 is the value reported from the 2009 PCPCMP prepared by Minshew in September 2009. Cost for 2011 is the value reported from the PCPCMP prepared by Ausenco Vector in September 2011.
(7) Inyo County established a "Pledge of Revenue" as the financial mechanism for anticipated postclosure costs.
(8) Inyo County subscribes to an insurance policy w/ environmental liability coverage for corrective action costs.

Table 4. Lone Pine Landfill (SWS #14-AA-0003) Year 2013 Closure Fund Deposit Calculations
Inyo County, California

Description	Symbol	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Inflation Factor (prior year)	I	2.1%	2.2%	1.1%	1.7%	2.1%	2.8%	n/a (2)	2.7%	2.2%	n/a (2)	n/a (2)	n/a (2)	2.1%	1.8%	1.5%
Total Permitted Site Capacity (CY) (3)	TPC	1,207,740	1,207,740	1,207,740	1,207,740	1,207,740	1,207,740	1,207,740	989,984	989,984	989,984	1,228,988	1,228,988	1,228,988	1,228,988	1,228,988
Disposal Capacity Filled (CY) (4)	CF	7,172	5,022	6,914	10,271	8,979	8,841	7,546	3,041	6,826	5,814	10,266	10,029	8,542	8,830	8,335
Remaining Permitted Capacity (CY) (5)	RPC=TPC-r-CF	961,372	986,350	979,436	969,165	960,186	951,345	943,789	986,943	980,117	974,303	776,488	766,469	757,927	749,097	740,782
Post-93 Disposal Consumption Ratio	CF/RPC	0.00723	0.00509	0.00706	0.01060	0.00935	0.00929	0.00800	0.00308	0.00696	0.00597	0.01322	0.01308	0.01127	0.01179	0.01125
Closure Cost Estimate (6)	C	\$1,334,421	\$1,362,443	\$1,392,417	\$1,407,734	\$1,431,665	\$1,461,730	\$1,502,659	\$1,294,058	\$1,328,998	\$1,358,236	\$1,561,040	\$2,225,862	\$2,272,626	\$2,313,533	\$2,348,236
Postclosure Cost Estimate (7)	PC	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Corrective Action Cost Estimate (8)	CA	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Total Cost Estimate	TC	\$1,334,421	\$1,362,443	\$1,392,417	\$1,407,734	\$1,431,665	\$1,461,730	\$1,502,659	\$1,294,058	\$1,328,998	\$1,358,236	\$1,561,040	\$2,225,862	\$2,272,626	\$2,313,533	\$2,348,236
Minimum Fund Balance Required Pre-Deposit	B _p	\$1,166,625	\$1,177,059	\$1,183,084	\$1,191,631	\$1,204,519	\$1,215,994	\$1,227,571	\$1,237,766	\$1,241,021	\$1,248,598	\$1,255,220	\$1,277,484	\$1,288,044	\$1,298,044	\$1,303,794
Min Calculated Remaining Cost Estimate	C _r = TC-B _p	\$165,796	\$185,384	\$1209,323	\$1,216,103	\$1,227,146	\$1,245,736	\$1,275,088	\$1,056,292	\$1,087,977	\$1,109,638	\$1,305,820	\$1,953,398	\$1,974,582	\$1,993,235	\$2,004,442
Required Annual Fund Deposit	FD=(CF/RPC) x C _r	\$ 8,434	\$ 6,035	\$ 8,537	\$ 12,888	\$ 11,475	\$ 11,577	\$ 10,195	\$ 3,255	\$ 7,577	\$ 6,622	\$ 17,864	\$ 25,560	\$ 22,254	\$ 23,496	\$ 22,555
Minimum Fund Balance Required after Deposit	FB=B _p +FD	\$177,059	\$183,094	\$191,631	\$204,519	\$215,994	\$227,571	\$237,766	\$241,021	\$248,598	\$255,220	\$272,484	\$298,044	\$320,298	\$343,794	\$366,348
Minimum Fund Balance Required after Deposit		\$ 366,348														
Actual Fund Balance Prior to Annual Deposit (6/30/13)		\$ 344,440														
Difference Prior to Annual Deposit		\$ 21,908														
Minimum Fund Deposit Required to Bring Fund Into Compliance		\$ 21,908														

(1) Anniversary of fund is August 29th of each year.

(2) Inflation factor not used due to updated costs for closure in Preliminary Closure and Post-Closure Maintenance Plan, PCPCMP (April 2007, September 2009, and May 2011).

(3) 1990 disposal capacity based on 583,946 cy less 143,959 cy (capacity filled prior to 1999). Recalculated in 1999; also in 2007 by Wendell Minshew to be 989,984 cy as of 12/31/06. The 2010 capacity is based on Wendell Minshew September 2009 capacity estimate in the 2009 PCPCMP.

(4) Through June 30, 2012. See Table 1. Disposal capacity filled includes solid waste disposed and space consumed by ADC and soil used as cover. Disposal capacity filled in 2007 was for 1st and 2nd quarters of 2007.

(5) Remaining permitted capacity as of June 30th of year shown. 2010 Remaining capacity (remaining airspace) of 776,498 cy is based on based on Minshew September 2009 capacity estimate in the 2009 PCPCMP of 786,764 cy minus 2009/2010 disposal capacity filled of 10,266 cy. The 2011 remaining capacity of 766,469 cy is the remaining capacity of 776,498 cy minus the 2010/2011 disposal capacity filled of 10,029 cy.

(6) Closure cost estimate was modified in 1/1996, 9/2009, and 8/2011 for updated closure plans; in other years the closure cost estimate was updated by inflation index. Cost for 2010 is the value reported from the 2009 PCPCMP prepared by Minshew in September 2009. Cost for 2011 is the value reported from the PCPCMP prepared by Ausenco Vector in August 2011.

(7) Inyo County established a "Pledge of Revenue" as the financial mechanism for anticipated postclosure costs.

(8) Inyo County subscribes to an insurance policy w/ environmental liability coverage for corrective action costs.

Table 5. Shoshone Disposal Site (SWIS #14-AA-0006) Year 2013 Closure Fund Deposit Calculations
Inyo County, California

Description	Symbol	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2012	2013	2014
Initial Factor (prior year)	I	2.1%	2.2%	1.1%	1.7%	2.1%	2.8%	2.9%	2.7%	2.2%	n/a (2)	n/a (2)	n/a (2)	2.1%	1.8%	1.8%	1.5%
Total Permitted Site Capacity (cy) (3)	TPC	59,020	59,020	59,020	59,020	59,020	59,020	59,020	59,020	59,020	59,020	120,937	120,937	120,937	120,937	120,937	120,937
Disposal Capacity Filled (cy) (4)	CF	0	0	100	5	2	0	0	0	0	15	0	5	0	0	0	0
Remaining Permitted Capacity (cy) (5)	RPC=TPC - CF	8,038	8,038	7,933	7,933	7,931	7,931	7,931	7,931	7,931	7,916	43,545	43,540	43,540	43,540	43,540	43,540
Post-93 Disposal Consumption Ratio	CF/PRC	0.00000	0.00000	0.01260	0.00663	0.00625	0.00000	0.00000	0.00000	0.00000	0.00189	0.00000	0.00011	0.00000	0.00000	0.00000	0.00000
Closure Cost Estimate (6)	C	\$ 206,756	\$ 211,097	\$ 215,742	\$ 218,115	\$ 221,823	\$ 226,481	\$ 232,822	\$ 239,574	\$ 246,043	\$ 251,456	\$ 421,655	\$ 453,295	\$ 462,814	\$ 471,145	\$ 479,625	\$ 486,820
Postclosure Action Cost Estimate (7)	PC	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Corrective Action Cost Estimate (8)	CA	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Total Cost Estimate	TC	\$ 206,756	\$ 211,097	\$ 215,742	\$ 218,115	\$ 221,823	\$ 226,481	\$ 232,822	\$ 239,574	\$ 246,043	\$ 251,456	\$ 421,655	\$ 453,295	\$ 462,814	\$ 471,145	\$ 479,625	\$ 486,820
Minimum Fund Balance Required Pre-Deposit	B _p	\$ 4,573	\$ 4,573	\$ 4,573	\$ 7,233	\$ 7,366	\$ 7,420	\$ 7,420	\$ 7,420	\$ 7,420	\$ 7,420	\$ 7,883	\$ 7,883	\$ 7,934	\$ 7,934	\$ 8,077	\$ 8,222
Min Calculated Remaining Cost Estimate	G _r = TC - B _p	\$ 202,183	\$ 206,524	\$ 211,169	\$ 210,882	\$ 214,457	\$ 219,061	\$ 225,402	\$ 232,154	\$ 238,623	\$ 244,036	\$ 413,772	\$ 445,412	\$ 454,880	\$ 463,211	\$ 471,548	\$ 478,597
Required Annual Fund Deposit	FD = (CF/PRC) x C _r	\$ -	\$ -	\$ 2,660	\$ 133	\$ 54	\$ -	\$ -	\$ -	\$ -	\$ 462	\$ -	\$ 51	\$ -	\$ -	\$ -	\$ -
Minimum Fund Balance Required after Deposit	FB = B _p + FD	\$ 4,573	\$ 4,573	\$ 7,233	\$ 7,366	\$ 7,420	\$ 7,420	\$ 7,420	\$ 7,420	\$ 7,883	\$ 7,883	\$ 7,883	\$ 7,934	\$ 7,934	\$ 8,077	\$ 8,222	\$ 8,222
Minimum Fund Balance Required after Deposit		\$ 8,222															
Actual Fund Balance Prior to Annual Deposit (6/30/13)			\$ 8,340														
Difference Prior to Annual Deposit			\$ (118)														
Minimum Fund Deposit Required to Bring Fund into Compliance			\$ -														

- (1) Anniversary of fund is August 29th of each year.
(2) Inflation factor not used due to updated costs for closure in Preliminary Closure and Post-Closure Maintenance Plan, PCPCMP (2009, 2010, and 2011).
(3) The 1990 disposal capacity based on 484,000 cy less 26,180 cy (capacity filled prior to 1999). The 2010 capacity is based on calculations for the 2010 PCPCMP prepared by Vector Engineering, Inc. which was to be included in the 2010 PCPCMP.
(4) Through June 30, 2012. See Table 1. Disposal capacity filled includes solid waste disposed and space consumed by ADC and soil used as cover.
(5) Remaining permitted capacity as of June 30th of year shown. Remaining capacity (remaining airspace) of 43,545 cy based on capacity estimate by Vector Engineering for 2010 PCPCMP. This capacity includes waste, daily cover, and final cover.
(6) Closure cost estimate was modified in 1/1996, 2/1999, 3/2010, 10/2011 closure plans; other closure cost estimates were updated by inflation index. Cost for 2010 is the value calculated as part of the 2010 PCPCMP prepared by Vector Engineering in 2010. Cost for 2011 is the value reported from the PCPCMP prepared by Ausenco Vector in October 2011.
(7) Inyo County established a "Pledge of Revenue" as the financial mechanism for anticipated postclosure costs.
(8) Inyo County subscribes to an insurance policy w/ environmental liability coverage for corrective action costs.

Table 6. Tecopa Disposal Site (SWIS #14-AA-0007) Year 2013 Closure Fund Deposit Calculations
Inyo County, California

Description	Symbol	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Inflation Factor (prior year)	I	2.1%	2.2%	1.1%	1.7%	2.1%	2.8%	2.9%	2.7%	2.2%	n/a (2)	n/a (2)	1.0%	2.1%	1.8%	1.5%
Total Permitted Site Capacity (cy) (3)	TPC	119,090	119,090	119,090	119,090	119,090	119,090	119,090	119,090	119,090	119,090	256,068	256,068	256,068	256,068	256,068
Disposal Capacity Filled (cy) (4)	CF	0	0	210	15	3	0	0	0	0	20	0	0	0	25	0
Remaining Permitted Capacity (cy) (5)	RPC=TPC-(CF * I)	37,048	37,048	36,838	36,873	36,820	36,820	36,820	36,820	36,820	36,800	92,580	92,580	92,580	92,555	92,555
Post-93 Disposal Consumption Ratio	CF/RPC	0.00000	0.00000	0.00570	0.00041	0.00008	0.00000	0.00000	0.00000	0.00000	0.00054	0.00000	0.00000	0.00000	0.00027	0.00000
Closure Cost Estimate (6)	C	\$ 342,664	\$ 349,860	\$ 357,557	\$ 361,490	\$ 367,635	\$ 375,356	\$ 385,866	\$ 397,056	\$ 407,776	\$ 416,747	\$ 521,567	\$ 526,763	\$ 537,845	\$547,526	\$555,739
Postclosure Cost Estimate (7)	PC	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Corrective Action Cost Estimate (8)	CA	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Total Cost Estimate	TC	\$ 342,664	\$ 349,860	\$ 357,557	\$ 361,490	\$ 367,635	\$ 375,356	\$ 385,866	\$ 397,056	\$ 407,776	\$ 416,747	\$ 521,567	\$ 526,763	\$ 537,845	\$547,526	\$555,739
Minimum Fund Balance Required Pre-Deposit	B _p	\$ 27,290	\$ 27,290	\$ 27,290	\$ 29,172	\$ 29,308	\$ 29,335	\$ 29,335	\$ 29,335	\$ 29,335	\$ 29,335	\$ 29,546	\$ 29,546	\$ 29,546	\$ 29,546	\$ 29,686
Min Calculated Remaining Cost Estimate	C _r = TC-B _p	\$ 315,374	\$ 322,570	\$ 330,267	\$ 332,318	\$ 338,327	\$ 346,021	\$ 356,531	\$ 367,721	\$ 378,441	\$ 387,412	\$ 492,021	\$ 497,217	\$ 508,299	\$517,980	\$526,053
Required Annual Fund Deposit	FD=(CF/RPC) x C _r	\$ -	\$ -	\$ 1,863	\$ 135	\$ 28	\$ -	\$ -	\$ -	\$ -	\$ 211	\$ -	\$ -	\$ -	\$ 140	\$ -
Minimum Fund Balance Required after Deposit	FB=B _p + FD	\$ 27,290	\$ 27,290	\$ 29,173	\$ 29,308	\$ 29,336	\$ 29,336	\$ 29,336	\$ 29,336	\$ 29,336	\$ 29,546	\$ 29,546	\$ 29,546	\$ 29,546	\$ 29,686	\$ 29,686
Minimum Fund Balance Required after Deposit		\$ 29,686														
Actual Fund Balance Prior to Annual Deposit (6/30/13)		\$ 29,797														
Difference Prior to Annual Deposit		\$ (111)														
Minimum Fund Deposit Required to Bring Fund into Compliance		\$ -														

(1) Anniversary of fund is August 29th of each year.

(2) Inflation factor not used due to updated costs for closure in Preliminary Closure and Post-Closure Maintenance Plan, PCPCMP (2008, 2010). The 2010 cost estimate based on the 2010 revised PCPCMP prepared by Vector Engineering.

(3) 1990 disposal capacity based on 711,480 cy less 81,179 cy (capacity filled prior to 1989). Recalculated in 1989. The 2010 capacity is based on calculations for the 2010 PCPCMP prepared by Vector Engineering, Inc. which was to be included in the 2010 PCPCMP.

(4) Through June 30th, 2012. See Table 1. Disposal capacity filled includes solid waste disposed and space consumed by ADC and soil used as cover.

(5) Remaining permitted capacity was as of June 30th of year shown. Remaining capacity (remaining airspace) of 92,580 cy based on capacity estimate by Vector Engineering for 2010 PCPCMP.

(6) Closure cost estimate was modified in 1/1996, 2/1999, 3/2010 closure plans; other closure cost estimates were updated by inflation index. Cost for 2010 is the value calculated as part of the 2010 PCPCMP prepared by Vector Engineering in 2010.

(7) Inyo County established a "Pledge of Revenue" as the financial mechanism for anticipated postclosure costs.

(8) Inyo County subscribes to an insurance policy w/ environmental liability coverage for corrective action costs.

In the Rooms of the Board of Supervisors

County of Inyo, State of California

I, HEREBY CERTIFY, that at a meeting of the Board of Supervisor of the County of Inyo, State of California, held in their rooms at the County Administrative Center in Independence on the 16th day of *September* 2014 an order was duly made and entered as follows:

Resol. #2014-42/ Closure and Post Financial Closure Assurances

Ms. Pam Hennarty, Sr. Deputy County Administrator, provided additional information and further explanation concerning the financial assurances for the closure and post closure maintenance and corrective action for the County's landfills that is being required by Cal Recycle. She explained that the County has budgeted money through an enterprise account for the closure and post closure maintenance costs and now the State is requiring that the County also pledge funds for corrective action plans. Ms. Hennarty recapped the financial statistics of what the County has and is doing to meet the demands of the State regarding County landfill closure and post closure maintenance costs and funds pledge for corrective action plans, which included:

- (a) that last year the County budgeted \$108,000, and this year the County budgeted \$105,000 for closure and post closure maintenance costs;
- (b) these amounts are set aside to cover the more than \$12.6 million the State has estimated for the cost of closing the County's landfills when they reach their capacity;
- (c) when all of the State and Federal regulations are calculated, the State expects the County of Inyo to pledge \$900,000 a year to cover the costs of the corrective action and post closure requirements that will be required when the landfills reach capacity and beyond the closure should problems arise that have to be corrected;
- (d) the \$900,000 a year is the amount that is required before the County ever process one bit of waste;
- (e) the County's gate fees at the landfills generate from self haulers and commercial haulers only \$618,000 a year to cover the \$900,000 in State and Federal mandates and for costs of processing the waste; and
- (f) additionally, the County pays \$108,000 a year to the State to cover the State's costs to ensure that the County is meeting the requirements.

The County Administrator explained that the closure and post closure maintenance costs are one-size fits all standards applied across the United States. He said the standards are driven by Federal Sub Title D relative to landfill siting and they are designed for landfills east of the Mississippi that get a lot more rain fall then landfills in the west, in particularly in "The Land of EVEN Less Water," where some of the closure standards we are designing to and constructing to will never be applicable here because we don't have the precipitation to percolate down to cause leachate and groundwater problems. He also explained how far reaching the new standards are that require corrective action funds, by siting an example of the State making a corrective action finding against Inyo County which required the County to clean-up and contain an old dump site that has not been used in decades, that was compromised by rain water, that is not even a part of the County's solid waste facilities system.

The County Administrator, Ms. Hennarty, and the Board discussed the regulations and the impact to Inyo County now and in the future. The Board asked that Ms. Hennarty find a way to provide this information to the public.

On a motion by Supervisor Arcularius and a second by Supervisor Griffiths, Resolution No. 2014-42, titled "A Resolution of the Inyo County Board of Supervisors, Rescinding Inyo County Resolution No. 97-24 Which Created an Enterprise Fund and Related Financial Assurance Mechanism for Closure and Postclosure Maintenance of Inyo County Landfills," was approved: motion unanimously passed and adopted.

WITNESS my hand and the seal of said Board this 16th

ay of September 2014



KEVIN D. CARUNCHIO
Clerk of the Board of Supervisors

By:

Patricia Gunsolley
Patricia Gunsolley, Assistant

Routing

CC _____
Purchasing _____
Personnel _____
Auditor _____
CAO _____
Other Integ. Waste _____

DATE: September 26, 2014



AGENDA REQUEST FORM
BOARD OF SUPERVISORS
COUNTY OF INYO

For Clerk's Use Only:
AGENDA NUMBER

13

- ☐ Consent ☒ Departmental ☐ Correspondence Action ☐ Public Hearing
☐ Scheduled Time for ☐ Closed Session ☐ Informational

FROM: Inyo Recycling and Waste Management

FOR THE BOARD MEETING OF: September 16, 2014

SUBJECT: Establish Pledge of Revenue for Post Closure Maintenance and Corrective Action through resolution and agreement with CalRecycle.

DEPARTMENTAL RECOMMENDATION: Request the Board approve A) a Resolution titled "A Resolution of the Inyo County Board of Supervisors, Rescinding Inyo County Resolution No. 97-24 Which Created an Enterprise Fund and Related Financial Assurance Mechanism for Closure and Postclosure Maintenance of Inyo County Landfills;" B) a Resolution titled "A Resolution of the Inyo County Board of Supervisors, State of California, Establishing Financial Assurance for Closure, Postclosure Maintenance and Corrective Action of the Inyo County Landfills;" C) the Agreement with CalRecycle to establish a Pledge of Revenue for Post Closure Maintenance and Corrective Action for Inyo County Landfills."

SUMMARY DISCUSSION: CalRecycle has determined that we must amend our Pledge of Revenue for Post Closure Maintenance to now include the cost of Corrective Action. Through County Counsel's advice we are asking your Board to rescind Resolution 97-24: "A Resolution of the Inyo County Board of Supervisors, Rescinding Inyo County Resolution No. 97-24 which created an Enterprise Fund and Related Financial Assurance Mechanism for Closure and Postclosure Maintenance of Inyo County Landfills," and to approve a resolution, that continues the Enterprise Fund for the cost of closure of the County Landfills, and pledges revenue from the Inyo Recycling and Waste Management's net revenues towards Post Closure Maintenance and Corrective Action if so needed. An Agreement Pledging of Revenue for Post Closure and Corrective Action also requires your Board's approval.

The total cost of closing all Inyo County Landfills is projected in 2014 dollars to be \$12,738,014. To ensure that the money will be available when the landfills reach their capacity the State of California requires Inyo County to establish an enterprise fund for each landfill. In 2013 Inyo County added \$112,047.31 to the closure funds. In 2014 Inyo County will be adding \$105,433 to the closure cost, which is based on the amount of waste buried in all County Landfills during fiscal year 2013-2014.

Closure Costs		
	Cost (2014 Dollars)	Annual Deposit
Bishop-Sunland Landfill	\$7,690,895	\$64,356
Independence Landfill	\$1,656,324	\$19,169
Lone Pine Landfill	\$2,348,236	\$21,908
Shoshone Landfill	\$486,820	\$0.00
Tecopa Landfill	\$555,739	\$0.00
Totals:	\$12,738,014	\$105,433

The state requires Inyo County to establish the cost of post-closure monitoring as well as the cost of potential corrective action that could occur before or after closure of the landfills. The state further requires Inyo County pledge a revenue source to ensure that the county has the funds to pay for post-closure activities for 30 years after the closure of the landfill as mandated by the state, as well as for any potential corrective action. If Inyo County fails to perform post-closure monitoring and/or corrective actions then the money that is being pledged as part of this Pledge of Revenue Agreement with CalRecycle will be used to perform these actions.

The projected cost of post-closure maintenance for all landfills combined will be \$320,311 (in 2014 dollars) per year for a 30 year period. The projected cost for all landfills requiring corrective action could be as high as \$12,669,601 over a 30 year period, this translates into a projected \$422,320 per year to perform corrective action at all of the counties landfills.

There are currently corrective action measures occurring at the Bishop-Sunland Landfill, with a total projected cost of \$939,000. In addition, there is an estimated \$159,100 spent each year in monitoring, operations and maintenance of the corrective action system being installed at the Bishop-Sunland Landfill.

It is most common for other Jurisdictions to pledge gate fees to cover the cost of post-closure maintenance and corrective actions. In fiscal-year 2012-2013 Inyo Recycling collected \$618,345 through all gate fees for trash disposal. The total amount of money the County must pledge is \$901,730 per year. Due to the gap of \$283,385 between revenues being pledged and the gate fees collected Inyo Recycling is proposing to pledge "All Net Revenue" to perform Post Closure Maintenance and/or Corrective Actions, this includes gate fees, Waste Hauler Permit Fees, and any other revenues that are collected by Inyo Recycling and Waste Management. If Post Closure Maintenance and/or Corrective actions do need to be performed then Inyo County will need to allocate funding towards these projects, funds that are not currently included in the Inyo Recycling budget.

Post Closure Maintenance Costs

Lone Pine Facility	\$59,934
Independence Facility	\$67,187
Bishop-Sunland Facility	\$99,564
Shoshone Facility	\$45,758
Tecopa Facility	\$47,866
Total	\$320,309

Corrective Action Costs

Lone Pine Facility	\$2,774,503
Independence Facility	\$2,496,296
Bishop-Sunland Facility	\$3,664,956
Shoshone Facility	\$1,879,984
Tecopa Facility	\$1,853,859
Total:	\$12,669,598

The costs shown for Post Closure Maintenance and Corrective Action are costs that Inyo Recycling and Waste Management may need to budget in the future.

Currently Inyo Recycling pays \$108,417 in taxes and fees to the State of California each year to ensure that CalRecycle, Lahontan Regional Water Quality Control Board, and the Great Basin Air Pollution Control Board have enough funds to inspect, monitor and regulate the County's landfills.

ALTERNATIVES: Your Board could choose not to approve the agreement or the resolutions for Pledge of Revenue for Post Closure and Corrective Action, but in so doing Inyo County will be in violation of State of California law that requires landfill operators/owners to demonstrate financial responsibility for closure and postclosure maintenance and corrective actions.

OTHER AGENCY INVOLVEMENT: Inyo County Auditor

FINANCING: No changes to the Integrated Waste Management Budget will be affected at this time.

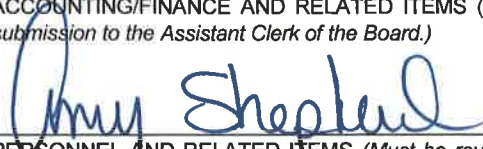
APPROVALS

COUNTY COUNSEL:

AGREEMENTS, CONTRACTS AND ORDINANCES AND CLOSED SESSION AND RELATED ITEMS (Must be reviewed and approved by county counsel prior to submission to the Assistant Clerk of the Board.)

Margaret Kemp-Williams

Approved: x Date 09/01/14

AUDITOR/CONTROLLER:	<p>ACCOUNTING/FINANCE AND RELATED ITEMS (Must be reviewed and approved by the auditor-controller prior to submission to the Assistant Clerk of the Board.)</p> <p> Approved: <u>yes</u> Date <u>9/10/14</u></p>
PERSONNEL DIRECTOR:	<p>PERSONNEL AND RELATED ITEMS (Must be reviewed and approved by the director of personnel services prior to submission to the Assistant Clerk of the Board.)</p> <p>Approved: _____ Date _____</p>

DEPARTMENT HEAD SIGNATURE:

(Not to be signed until all approvals are received) _____ Date: _____

(The Original plus 20 copies of this document are required)

RESOLUTION NO. 2014-42

**A RESOLUTION OF THE INYO COUNTY BOARD OF SUPERVISORS, STATE OF CALIFORNIA,
RESCINDING INYO COUNTY RESOLUTION NO. 97-24 WHICH CREATED AN ENTERPRISE
FUND AND RELATED FINANCIAL ASSURANCE
MECHANISMS FOR CLOSURE AND POSTCLOSURE MAINTENANCE
OF INYO COUNTY LANDFILLS**

WHEREAS, Public Resources Code sections 43500 through 43610.1 and Title 27, California Code of Regulations, Division 2, Subdivision 1, Chapter 6, require operators of solid waste landfills to demonstrate the availability of financial resources to conduct closure, postclosure maintenance, and corrective action activities; and,

WHEREAS sections 22228 and 22241 of the Regulations specify an Enterprise Fund and Pledge of Revenue as acceptable mechanisms to demonstrate financial responsibility for financing the closure and postclosure maintenance of solid waste landfills operated by a government agency; and,

WHEREAS, the County of Inyo is a government agency;

WHEREAS, on April 15, 1997, the Inyo County Board of Supervisors adopted Resolution 97-24, creating an Enterprise Fund and related financial assurance mechanisms for closure and postclosure maintenance of Inyo County Landfills;

WHEREAS, it is the intention of the Inyo County Board of Supervisors to rescind Resolution No. 97-24 and adopt a new Resolution creating an Enterprise Fund and related financial assurance mechanisms for closure and postclosure maintenance of Inyo County Landfills with revisions requested by CalRecycle.

NOW, THEREFORE BE IT RESOLVED, by the Supervisors for the County of Inyo that resolution No. 97-24 creating an Enterprise Fund known as "Inyo County Solid Waste Fund No 0020" (Fund No. 0020) and related financial assurance mechanisms for closure and postclosure maintenance of Inyo County Landfills, adopted on April 15, 1997 be, and hereby is rescinded in its entirety, subject to all funds currently held in Fund No 0020 continuing to be held in that fund account with future funds added thereto.


PASSED AND ADOPTED by the Board of Supervisors, County of Inyo, State of California, this of 16th day
September 2014, by the following vote:

AYES: NOES: Supervisors Arcularius, Griffiths, Pucci, Tillemans and Kingsley
ABSENT: -0-


Chairperson Richard Pucci

INYO COUNTY BOARD OF SUPERVISORS

ATTEST: Kevin Carunchio
Clerk of the Board

by: 
Patricia Gunsolley, Assistant



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027

P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

NOV 20 2014

Mr. Scott W. Eagan
Integrated Waste Management Superintendent
Inyo County Integrated Waste Management Program
163 May Street
Bishop, CA 93514

RE: Approval of Pledge of Revenue Agreement for Postclosure Maintenance and Corrective
Action Costs for Inyo County Landfills

Dear Mr. Eagan:

The California Department of Resources Recycling and Recovery (CalRecycle) staff reviewed the pledge of revenue agreement for the following Inyo County Landfills:

<u>Landfill</u>	<u>Facility No.</u>
Lone Pine Facility	14-AA-0003
Independence Facility	14-AA-0004
Bishop-Sunland Facility	14-AA-0005
Shoshone Facility	14-AA-0006
Tecopa Facility	14-AA-0007

As a result of this review, the CalRecycle finds that the Pledge of Revenue Agreement meets the requirements of Title 27, California Code of Regulations, Division 2, Subdivision 1, Chapter 6, Subchapter 3, Article 2, section 22245 – Pledge of Revenue, and as such, is approved.

Enclosed, please find one signed original of the Pledge of Revenue Agreement. CalRecycle is maintaining one signed original for our records. Please contact Richard Castle of the Financial Assurances Unit at (916) 341-6343 if you have any questions regarding this determination.

Sincerely,

A handwritten signature in black ink, appearing to read "S Markie", with a stylized flourish at the end.

Susan Markie, Chief
Permitting and Assistance Branch
Waste Permitting, Compliance & Mitigation Division

cc: Marvin Moskowitz, Inyo County Dept. of Envir. Health Services, LEA
Alfred Worcester, Closure and Technical Support Section, CalRecycle
Margaret Comotto, Permits and Assistance North Unit, CalRecycle
Richard Castle, Financial Assurances Unit, CalRecycle



**PLEDGE OF REVENUE AGREEMENT FOR POSTCLOSURE
MAINTENANCE AND CORRECTIVE ACTION INYO COUNTY LANDFILLS**

This agreement establishes a Pledge of Revenue to assure that adequate funds are available to carry out the Postclosure Maintenance and Corrective Action of the following Inyo County Landfills:

Lone Pine Facility	No.	14-AA-0003
Independence Facility	No.	14-AA-0004
Bishop-Sunland Facility	No.	14-AA-0005
Shoshone Facility	No.	14-AA-0006
Tecopa Facility	No.	14-AA-0007

This Agreement shall become effective immediately, and is made and entered into by and between the County of Inyo and the California Department of Resources Recycling and Recovery (CalRecycle).

WHEREAS, Public Resources Code, sections 43500 through 43610.1 and Title 27, California Code of Regulations (Regulations), Subdivision 2, Chapter 6, require operators of solid waste landfills to demonstrate the availability of financial resources to conduct closure, postclosure maintenance, and corrective action activities; and

WHEREAS, sections 22228 and 22245 of the Regulations specify a Pledge of Revenue as an acceptable mechanism to demonstrate financial responsibility for postclosure maintenance and corrective action costs of a solid waste landfill operated by a governmental entity; and

WHEREAS, Inyo County, a California public entity, operates the above listed landfills in conformance with the findings, conditions, prohibitions and requirements contained in each of the landfill permits; and,

WHEREAS, the permits issued to the Inyo County Landfills listed above were issued by the Environment Health Services Department for the County of Inyo; and,

WHEREAS, the Environmental Health Services Department for the County of Inyo acts as the Local Enforcement Agency ("LEA") for CalRecycle; and,

WHEREAS, the County of Inyo is pledging net revenues and a portion of tipping fees and investment earnings from funds held in the Inyo County Enterprise Fund: "Inyo County Solid Waste Fund No 0020;" and,

WHEREAS, Inyo County has determined that the projected net revenues from identified sources during the state mandated period of postclosure maintenance identified in Public Resources Code Section 43509(a) and section 21900 of the Regulations and during the corrective action period, shall, during each year of these periods, be equal or greater than the yearly monitoring and postclosure maintenance and corrective action costs contained in the most recent cost estimates for the Inyo County Landfills, which have been submitted to CalRecycle in accordance with sections 21840 and 22101 of the Regulations.

AGREEMENT

NOW THEREFORE, the County of Inyo and CalRecycle do agree as follows;

1. The County of Inyo hereby establishes a pledge of revenue to demonstrate financial responsibility for postclosure maintenance and corrective action costs of the Inyo County Landfills in accordance with 27 CCR sections 22228 and 22245 in the amounts shown in Exhibit "A", which is attached hereto and incorporated into this Agreement by this reference.
2. The County of Inyo agrees to pledge net revenues and a portion of investment revenues from the Inyo County Solid Waste Fund No. 0020 as described herein.

3. The amount of the pledged revenue shall be equal to \$320,310 per year for each year of state mandated period of postclosure maintenance (Exhibit A), representing the most recent monitoring and postclosure maintenance cost estimate for the Inyo County Landfills. It is agreed that the amount of this pledge may increase or decrease to match any adjustment to the identified cost estimate, which is mutually agreed to by the County of Inyo and CalRecycle.
4. The amount of the pledged revenue shall be equal to \$422,320 per year for the estimated length of the reasonably foreseeable corrective action period, representing the most recent reasonably foreseeable corrective action cost estimate for the Inyo County Landfills (Exhibit A). It is agreed that the amount of this pledge may increase or decrease to match any adjustment to the identified cost estimate, as approved by the CalRecycle, LEA and RWQCB, as applicable.
5. If the County of Inyo ceases at any time to retain control of its ability to allocate the pledged revenue as identified herein to pay postclosure maintenance costs and/or corrective action costs, the County of Inyo shall notify CalRecycle and the local enforcement agency and shall obtain alternate coverage within sixty (60) days after the control of funds lapses, pursuant to section 22245 of the Regulations.
6. In the event that CalRecycle, RWQCB or LEA staff determines that the County of Inyo has failed, or is failing, to perform postclosure maintenance and/or corrective actions as required by law, CalRecycle, RWQCB and/or LEA staff shall confer with the County of Inyo and attempt to resolve the alleged violation. If no agreement is reached, the matter shall be presented to CalRecycle which shall give reasonable notice, hold a public hearing, and consider the testimony and documentation submitted by the CalRecycle and/or LEA staff, the County of Inyo, and any interested parties, prior to making a determination in the matter. In the event CalRecycle then determines that the County of Inyo has failed, or is failing, to perform postclosure maintenance and/or corrective action as required by law, CalRecycle may direct the Auditor-Controller to pay the Director of Inyo County Integrated Waste Management Program from the pledged revenues sufficient funds to ensure postclosure maintenance and/or corrective action, who then shall be obligated to use such funds for postclosure maintenance and/or corrective action in accordance with the directives of CalRecycle and RWQCB.

IN WITNESS HEREOF, the parties have executed this agreement on the date as set forth below. By County

this 16th day of September, 2014

By CalRecycle this 14th day of November, 2014

STATE OF CALIFORNIA

Department of Resources Recycling and Recovery

By: [Signature]
Authorized Officer of CalRecycle

APPROVED AS TO FORM
AND PROCEDURE:

By: [Signature]
Authorized Counsel of the CalRecycle

COUNTY OF INYO

By: [Signature]
Deputy County Administrative Officer

APPROVED AS TO FORM
AND PROCEDURE:

By: [Signature]
County Counsel

EXHIBIT "A"

Attachment to Pledge of Revenue Agreement Dated _____, 2014, Between the County of Inyo and the California Department of Resources Recycling and Recovery (CalRecycle).

The Annual postclosure maintenance cost estimate for all Inyo County Landfills is set forth on an individual basis as follows:

Lone Pine Facility	No.	14-AA-0003	\$59,934
Independence Facility	No.	14-AA-0004	\$67,187
Bishop-Sunland Facility	No.	14-AA-0005	\$99,564
Shoshone Facility	No.	14-AA-0006	\$45,758
Tecopa Facility	No.	14-AA-0007	\$47,866
Total			\$320,309

The Corrective Action Cost estimate for all Inyo County Landfills is set forth on an individual basis as follows:

Lone Pine Facility	No.	14-AA-0003	\$2,774,503
Independence Facility	No.	14-AA-0004	\$2,496,296
Bishop-Sunland Facility	No.	14-AA-0005	\$3,664,957
Shoshone Facility	No.	14-AA-0006	\$1,879,985
Tecopa Facility	No.	14-AA-0007	\$1,853,859
Total:			\$12,669,598

SECTION V

LANDFILL OPERATOR LIABILITY INSURANCE

CERTIFICATE OF LIABILITY INSURANCE

(If additional space is needed, add attachment.)

Name of Insurer Westchester Surplus Lines Insurance Company	Address P.O. Box 41484 Philadelphia, PA 19101 Phone Number: (215) 640-2324	CA Insurer License Number: or NAIC Number: 10172
Name of Insured ESJPA Joint Purchase Group Member - Inyo County	Address 801 12th Street, Suite 600 Sacramento, CA 95814 Phone Number:	

Solid Waste Disposal Facilities Covered: (Enter Information for Each Facility)

LIMITS OF LIABILITY

Name	Address	Facility Information Number	Per Pollution Condition*	Policy Aggregate*
Tecopa Landfill	Old Spanish Trail Highway, Tecopa, CA 92389	14-AA-0007	\$5,000,000	\$15,000,000
Lone Pine Landfill	End Of Substation Road; East Of Hwy 395 Lone Pine, CA 93545	14-AA-0003	\$5,000,000	\$15,000,000
Independence Landfill	Dump Road ½ mile east of Highway 395 Independence, CA 93526	14-AA-0004	\$5,000,000	\$15,000,000
Bishop-Sunland Landfill	110 Sunland Reservation Road Bishop, CA 93514	14-AA-0005	\$5,000,000	\$15,000,000
Shoshone Landfill	1 Mile East Of Shoshone On Hwy 127 Shoshone, CA 92384	14-AA-0006	\$5,000,000	\$15,000,000
			TOTAL \$5,000,000	TOTAL \$15,000,000
Policy Number: G22067527 004		Effective Date: 09/15/2014 to 09/15/2017		

*Excluding legal defense costs and deductibles

INSURER CERTIFICATION:

1. The insurer hereby certifies that it has issued liability insurance covering bodily injury and property damage to the insured listed above in connection with the insured's obligation to demonstrate financial responsibility under Title 27, California Code of Regulations, Division 2, Subdivision 1, Chapter 6. The coverage applies to the above-listed facility(ies) for accidental occurrences arising from the operation of the facility(ies).

2. Indicate whether this coverage is ☒ primary or ☐ excess coverage.

3. The limits of liability are the amounts stated above for "per pollution condition" and "policy aggregate", exclusive of legal defense costs. If an excess coverage insurance policy is being provided, complete the following sentence:

[\$_____ per occurrence and \$_____ annual aggregate in excess of the underlying limits of \$_____ per occurrence and \$_____ annual aggregate.]

4. The insurance coverage is subject to all of the terms and conditions of the policy; provided, however, that any provisions of the policy inconsistent with sections (a) through (e) of this paragraph shall be amended to conform with sections (a) through (e):

(a) Bankruptcy or insolvency of the insured shall not relieve the insurer of its obligations under the policy to which this certification applies.

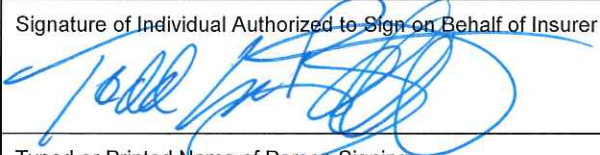
(b) The insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement from the insured for any such payment made by the insurer. If another mechanism, as specified in Title 27, California Code of Regulations, Division 2, Subdivision 1, Chapter 6, is used to demonstrate coverage of the deductible, then this section does not apply.

(c) Upon request by the California Integrated Waste Management Board (CIWMB), the insurer agrees to furnish to the CIWMB the original policy and all endorsements.

(d) Cancellation or any other termination of this certificate, whether by the insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the operator of the solid waste disposal facility(ies), will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is sent by certified mail, and received by the CIWMB, as evidenced by the return receipt. (See exception, section (e))

(e) Cancellation due to non-payment of premiums is effective only upon written notice and only after the expiration of 10 days after the date on which the operator and the CIWMB have received the notice of termination, as evidenced by the return receipts.

The party below certifies and signs under penalty of perjury that the information in this document is true and correct to the best of his or her knowledge, and satisfies the requirements of Title 27, California Code of Regulations, Division 2, Subdivision 1, Chapter 6, and that the insurer is licensed by the California Department of Insurance to transact the business of insurance in the State of California as an ☐ admitted carrier or ☒ eligible excess or surplus lines insurer.

Signature of Individual Authorized to Sign on Behalf of Insurer 	Title of Authorized Person Assistant Vice President, Westchester Specialty Insurance Services, Inc.
Typed or Printed Name of Person Signing Todd LaBandt	Date 1/29/2015
Address of Person Signing 999 18 th Street – South Tower, Suite 1550 Denver, CO 80202	
Phone Number of Person Signing (303) 256-1763	

PRIVACY STATEMENT

The Information Practices Act (California Civil Code Section 1798.17) and the Federal Privacy Act (5 U.S.C. 552a(e)(3)) require that this notice be provided when collecting personal information from individuals.

AGENCY REQUESTING INFORMATION: California Integrated Waste Management Board.

UNIT RESPONSIBLE FOR MAINTENANCE OF FORM: Financial Assurances Section, California Integrated Waste Management Board, 1001 I Street, P.O. Box 4025, Sacramento, California 95812-4025. Contact the Manager, Financial Assurances Section, at (916) 341-6000.

AUTHORITY: Public Resources Code section 43600 et seq.

PURPOSE: The information provided will be used to verify adequate financial assurance of solid waste disposal facilities listed.

REQUIREMENT: Completion of this form is mandatory. The consequence of not completing this form is denial or revocation of a permit to operate a solid waste disposal facility.

OTHER INFORMATION: After review of this document, you may be requested to provide additional information regarding the acceptability of this mechanism.

ACCESS: Information provided in this form may be provided to the U.S. Environmental Protection Agency, State Attorney General, Air Resources Board, California Department of Toxic Substances Control, Energy Resources Conservation and Development Commission, Water Resources Control Board, and California Regional Water Quality Control Boards. For more information or access to your records, contact the California Integrated Waste Management Board, 1001 I Street, P.O. Box 4025, Sacramento, California 95812-4025, (916) 341-6000.



Westchester Surplus Lines
INSURANCE COMPANY

**Public Entities Pollution Liability
Insurance Policy Declarations**

THE DECLARATIONS, TOGETHER WITH THE COMPLETED AND SIGNED APPLICATION, THIS POLICY AND ANY ENDORSEMENTS OR SCHEDULES ATTACHED HERETO, CONSTITUTE THE INSURANCE POLICY.

Policy Number: G22067527 002

Renewal of: G22067527 001

Item 1. **Named Insured:** ESJPA Joint Purchase Group
801 12th Street
Suite 600
Sacramento, CA 95814

Item 2. **Producer:** Alliant Specialty Insurance Services, Inc.
600 Montgomery Street
9th Floor
San Francisco, CA 94111

Item 3. **Policy Period:** Inception Date: September 15, 2008 Expiration Date: September 15, 2011

(12:01 A.M. Standard time at the address shown in Item 1.)

If "NOT INCLUDED" appears, then no such Coverage is provided under this policy.

Item 4. **Limits of Insurance:**

Policy Aggregate Limit	\$15,000,000	
Coverage A – Onsite Cleanup	NOT INCLUDED	Each Pollution Condition Limit
Coverage B – Offsite Cleanup	\$5,000,000	Each Pollution Condition Limit
Coverage C – Bodily Injury and Property Damage	\$5,000,000	Each Pollution Condition Limit
Coverage D – Contingent Transportation	NOT INCLUDED	Each Pollution Condition Limit

Item 5. **Deductible:** **\$25,000** Each Pollution Condition

Item 6. **Total Premium:** **\$400,302** (25% minimum earned)

Item 7. Retroactive Date:	Coverage A – Onsite Cleanup	Not Applicable
	Coverage B – Offsite Cleanup	Not Applicable
	Coverage C – Bodily Injury and Property Damage	Not Applicable
	Coverage D – Contingent Transportation	Not Applicable

Item 8. **Covered Location(s):**
23 Covered Locations as referred on the attached listing.



Westchester Surplus Lines
INSURANCE COMPANY

**Public Entities Pollution Liability
Insurance Policy Declarations**

Item 9. Forms and Endorsements:

ENV-9500 (10/04)	Public Entities Premises Pollution Liability Insurance Policy
ENV-9005 (07/05)	Contractors Pollution Liability Endorsement
ENV-9010 (12/04)	Additional Insured Endorsement
ENV-9013 (12/04)	Chemical and Sludge Applicator Endorsement
ENV-9018 (12/04)	Fungi, Mold or Microbial Matter Exclusion
ENV-9021 (01/08)	Intended Use Endorsement
ENV-9022 (12/04)	Minimum Earned Premium Endorsement
ENV-9023 (12/04)	Named Insured Endorsement
ENV-9031 (12/04)	Pollution Condition Exclusion
ENV-9038 (12/04)	Schedule of Known Conditions Endorsement
ENV-9046 (07/05)	Definition of Property Damage Amendment
ENV-3103 (08/04)	All Known or Reported Incidents Exclusion
ENV-3189 (07/05)	Premium Installment Endorsement
ENV-5100 (08/04)	Asbestos Amendatory Endorsement
ENV-5101 (08/04)	Exterior Insulation and Finish Systems Exclusion
ENV-5102 (10/04)	Nuclear Hazard Liability Exclusion
ENV-5103 (09/04)	Silica Exclusion
ENV-5106 (04/06)	Services of Suit Endorsement
ENV-033	Schedule of Specific Covered Locations
TRIA15c (01/08)	Policyholder Disclosure Notice of Terrorism Insurance Coverage
ENV-9950 (01/08)	Exclusion of Certified Acts of Terrorism
ALL-21101 (11/06)	Trade or Economic Sanctions Endorsement
MA-608255e (01/08)	Claims Directory Environmental/Umbrella/Excess Casualty
LD5S23g (02/05)	Signature Endorsement

Item 10.

March M. Dancer

Authorized Representative

Date:

September 25, 2008

Named Insured ESJPA Joint Purchase Group			Endorsement Number
Policy Symbol PPL	Policy Number	Policy Period 09/15/2008 to 09/15/2011	Effective Date of Endorsement 09-15-2008
Issued By (Name of Insurance Company) Westchester Surplus Lines Insurance Company			

THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.

SCHEDULE OF SPECIFIC COVERED LOCATION(S) ENDORSEMENT

Section IV, **DEFINITIONS**, Item 5. Covered location of the Premises Pollution Liability Coverage Form attached to this policy includes the following:

SCHEDULE OF SPECIFIC COVERED LOCATION(S):

1. Landfills:

Inyo County

Tecopa Landfill – SWIS 14-AA-0007
Lone Pine Landfill – SWIS 14-AA-0003
Independence Landfill – SWIS 14-AA-0004
Bishop-Sunland Landfill – SWIS 14-AA-0006
Shoshone Landfill – SWIS 14-AA-0006

Siskiyou County

Happy Camp Landfill – SWIS 47-AA-0026
McCloud Landfill – SWIS 47-AA-0001
Tulelake Landfill – SWIS 47-AA-0027
Black Butte Landfill – SWIS 47-AA-0003
Tennant Landfill – SWIS 47-AA-0033
Rogers Creek Landfill – SWIS 47-AA-0044
Kelly Gulch Landfill – SWIS 47-AA-0029
Hotelling Gulch Landfill – SWIS 47-AA-0045
Cecilville Landfill – SWIS 47-AA-0030
Weed Landfill – SWIS 47-AA-0019
Yreka Landfill – SWIS 47-AA-0002

Glenn County

Glenn County Landfill – SWIS 11-AA-0001

Colusa County

Evans Road Landfill – SWIS 06-AA-0001
Stonyford Landfill – SWIS 06-AA-0002

Mariposa County

Mariposa County Landfill – SWIS 22-AA-0001

Trinity County

Weaverville Landfill – SWIS 53-AA-0013

Tuolumne County

Jamestown (Tuolumne Central) Landfill – SWIS 55-AA-0001
Big Oak Flat (Groveland) Landfill – SWIS 55-AA-0002

No coverage is provided under this policy for any owned or leased location unless specifically scheduled on this endorsement or otherwise endorsed onto the policy.

SECTION VI

CLOSURE PLAN COMPLETENESS DETERMINATION FROM CALRECYCLE

Naomi Garcia

From: Wochnick, Michael [Michael.Wochnick@CalRecycle.ca.gov]
Sent: Tuesday, January 31, 2012 1:35 PM
To: 'Naomi Garcia'; Nordstrom-Lamkin, Diane
Cc: 'Jeff Ahlstrom'
Subject: RE: County of Inyo - Independence Landfill (CalRecycle Review of PCPCMP for Completeness Determination)

By regulation (27 CCR 21860[c]), for a reviewing agency to determine if the closure & postclosure maintenance plans are incomplete, that agency must let the operator know within 30 days of receipt of the document. If a reviewing agency does not notify the operator that the plans are incomplete within the timeline, the plans are deemed complete by default. Since no agency notified Inyo County within the allotted time schedule, the plans are deemed complete by default.

Please note however, that determination of completeness is NOT the same as approvable plans. Plans completeness determination only means that the plans have included information to address all required issues (i.e., there is information to review). However, it does not mean that the submitted information is acceptable or meets state requirements. Up to 120 days is allowed for the detailed review of the plans. Staff is currently conducting this detailed review.

*Michael Wochnick, P.E.
CalRecycle
Closure and Facility Engineering
916-341-6289
916-319-7334 (fax)*

From: Naomi Garcia [mailto:Naomi@TEAmbishop.com]
Sent: Tuesday, January 31, 2012 11:40 AM
To: Wochnick, Michael; Nordstrom-Lamkin, Diane
Cc: 'Jeff Ahlstrom'
Subject: County of Inyo - Independence Landfill (CalRecycle Review of PCPCMP for Completeness Determination)

Diane and Michael-

On behalf of the County of Inyo, we are putting together the 5-year Solid Waste Facility Permit Review Package for the Independence Landfill which is due to the LEA by February 9, 2012. We have received the landowner's signature on the SWFP application, and now the only item we are missing is the Completeness Determination on the Closure Plan from CalRecycle. I was wondering if we could get an update on the status of your review.

The PCPCMP for Independence Landfill was transmitted to your office on December 28, 2011. This revised version of the September 2011 PCPCMP update addressed all of CalRecycle's comments on the 2009 PCPCMP, and the landowner's comments on the September 2011 SWFP application, PCPCMP, and RDSI /JTD. Associated correspondence (comments and responses to comments) were also provided to CalRecycle at that time, but please let us know if any additional information is desired. If additional time is needed for determination of completeness, please inform us of your estimated timeframe for review.

Respectfully,
Naomi Garcia

TEAM
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