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ATTACHMENT DR UTILITY-1

Revised SPPE Section 4.18

4.18 UTILITIES AND SERVICE SYSTEMS

4.18.1 CEQA Checklist

ENVIRONMENTAL ISSUES	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Utilities and Service Systems				
Would the project:				
1) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
2) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
3) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
4) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
5) Be noncompliant with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

4.18.2 Environmental Setting

4.18.2.1 Regulatory Framework

Federal

Clean Water Act (CWA) / National Pollutant Discharge Elimination System (NPDES) Permits

The CWA is the cornerstone of water quality protection in the United States. The statute employs a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. These tools are employed to achieve the broader goal of restoring and maintaining the chemical, physical, and biological integrity of the nation's

waters so that they can support “the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water.”

The CWA regulates discharges from “non-point source” and traditional “point source” facilities, such as municipal sewage plants and industrial facilities. Section 402 of the Act creates the NPDES regulatory program which makes it illegal to discharge pollutants from a point source to the waters of the United States without a permit. Point sources must obtain a discharge permit from the proper authority (usually a state, sometimes EPA, a tribe, or a territory). NPDES permits cover industrial and municipal discharges, discharges from storm sewer systems in larger cities, storm water associated with numerous kinds of industrial activity, runoff from construction sites disturbing more than one acre, mining operations, and animal feedlots and aquaculture facilities above certain thresholds.

Permit requirements for treatment are expressed as end-of-pipe conditions. This set of numbers reflects levels of three key parameters: (1) biochemical oxygen demand (BOD), (2) total suspended solids (TSS), and (3) pH acid/base balance. These levels can be achieved by well-operated sewage plants employing "secondary" treatment. Primary treatment involves screening and settling, while secondary treatment uses biological treatment in the form of "activated sludge."

All so-called "indirect" dischargers are not required to obtain NPDES permits. An indirect discharger is one that sends its wastewater into a city sewer system, so it eventually goes to a sewage treatment plant. Although not regulated under NPDES, "indirect" discharges are covered by another CWA program called pretreatment. "Indirect" dischargers send their wastewater into a city sewer system, which carries it to the municipal sewage treatment plant, through which it passes before entering surface water.

Clean Water Act (CWA)

The Clean Water Act (CWA) regulates the water quality of all discharges into waters of the United States including wetlands, perennial and intermittent stream channels. Section 401, Title 33, Section 1341 of the CWA sets forth water quality certification requirements for “any applicant applying for a federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may result in any discharge into the navigable waters.”

The California SWRCB and RWQCBs enforce State of California statutes that are equivalent to or more stringent than the Federal statutes. RWQCBs are responsible for establishing water quality standards and objectives that protect the beneficial uses of various waters. (NPDES) Permit No. CAS612008, issued by Order No. R2-2009-0074 on October 14, 2009, which pertains to stormwater runoff discharge from storm drains and watercourses within their jurisdictions.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) was enacted in 1976 to address the huge volumes of municipal and industrial solid waste generated nationwide. After

several amendments, the current Act governs the management of solid and hazardous waste and underground storage tanks (USTs). RCRA was an amendment to the Solid Waste Disposal Act of 1965. RCRA has been amended several times, most significantly by the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRA is a combination of the first solid waste statutes and all subsequent amendments. RCRA authorizes the Environmental Protection Agency (EPA) to regulate waste management activities. RCRA authorizes states to develop and enforce their own waste management programs, in lieu of the Federal program, if a state's waste management program is substantially equivalent to, consistent with, and no less stringent than the Federal program.

State

California Department of Health Services

The Department of Health Services, Division of Drinking Water and Environmental Management, oversees the Drinking Water Program. The Drinking Water Program regulates public water systems and certifies drinking water treatment and distribution operators. It provides support for small water systems and for improving their technical, managerial, and financial capacity. It provides subsidized funding for water system improvements under the State Revolving Fund (SRF) and Proposition 50 programs. The Drinking Water Program also oversees water recycling projects, permits water treatment devices, supports and promotes water system security, and oversees the Drinking Water Treatment and Research Fund for methyl tertiary butyl ether (MTBE) and other oxygenates.

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (Regional Water Boards), collectively known as the California Water Boards (Water Boards), are dedicated to a single vision: abundant clean water for human uses and environmental protection to sustain California's future. Under the federal Clean Water Act (CWA) and the state's pioneering Porter-Cologne Water Quality Control Act, the State and Regional Water Boards have regulatory responsibility for protecting the water quality of nearly 1.6 million acres of lakes, 1.3 million acres of bays and estuaries, 211,000 miles of rivers and streams, and about 1,100 miles of exquisite California coastline.

Consumer Confidence Report Requirements

CCR Title 22, Chapter 15, Article 20 requires all public water systems to prepare a Consumer Confidence Report for distribution to its customers and to the SWRCB. The Consumer Confidence Report provides information regarding the quality of potable water provided by the water system. It includes information on the sources of the water, any detected contaminants in the water, the maximum contaminant levels set by regulation,

violations and actions taken to correct them, and opportunities for public participation in decisions that may affect the quality of the water provided.

Urban Water Management Planning Act

The Urban Water Management Planning Act has as its objectives the management of urban water demands and the efficient use of urban water. Under its provisions, every urban water supplier is required to prepare and adopt a UWMP. An “urban water supplier” is a public or private water supplier that provides water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually. The UWMP must identify and quantify the existing and planned sources of water available to the supplier, quantify the projected water use for a period of 20 years, and describe the supplier’s water demand management measures. The urban water supplier should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The California Department of Water Resources must receive a copy of an adopted UWMP.

California Water Code

California’s primary statute governing water quality and water pollution issues with respect to both surface waters and groundwater is the Porter-Cologne Water Quality Control Act of 1970 (Division 7 of the California Water Code) (Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and each of the RWQCBs power to protect water quality, and is the primary vehicle for implementation of California’s responsibilities under the Federal Clean Water Act. The Porter-Cologne Act grants the SWRCB and the RWQCBs authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product.

Each RWQCB must formulate and adopt a water quality control plan (Basin Plan) for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State water policy. The Porter-Cologne Act also provides that a RWQCB may include within its regional plan water discharge prohibitions applicable to particular conditions, areas, or types of waste.

The Water Code Section 13260 requires all dischargers of waste that may affect water quality in waters of the state to prepare and provide a water quality discharge report to the RWQCB. Section 13260a-c is as follows:

(a) Each of the following persons shall file with the appropriate regional board a report of the discharge, containing the information that may be required by the regional board:

(1) person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the state, other than into a community sewer system.

(2) A person who is a citizen, domiciliary, or political agency or entity of this state discharging waste, or proposing to discharge waste, outside the boundaries of the state in a manner that could affect the quality of the waters of the state within any region.

(3) A person operating, or proposing to construct, an injection well.

(b) No report of waste discharge need be filed pursuant to subdivision (a) if the requirement is waived pursuant to Section 13269.

(c) Each person subject to subdivision (a) shall file with the appropriate regional board a report of waste discharge relative to any material change or proposed change in the character, location, or volume of the discharge.

A Water Supply Assessment (WSA) is required pursuant to State Water Code Section 10910 if the project meets certain requirements outlined in Section 10912. A WSA is required for:

- A residential development of more than 500 units;
- A hotel or motel having more than 500 rooms;
- A commercial office building employing 1,000 people or having more than 250,000 sq. feet of floor space;
- An industrial, manufacturing or industrial park planned to house more than 1,000 employees or having more than 650,000 sq. feet of floor space;
- A mixed use project that contains one or more of the criteria above; or
- Any project that has a water demand equal to or greater than the amount of water required by a 500 dwelling unit development.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act is California's statutory authority for the protection of water quality. Under the Porter-Cologne Act, the State is required to adopt policies, plans, and objectives that will protect the State's waters for the use by and enjoyment of Californians. In California, the SWRCB has the authority and responsibility for establishing policy related to the State's water quality. Regional authority is delegated by the SWRCB to a RWQCB. The Porter-Cologne Act authorizes the SWRCB and RWQCB to issue NPDES permits.

Under the RWQCB NPDES permit system, all existing and future municipal and industrial discharges to surface water within the city would be subject to regulation. NPDES permits are required for operators of municipal separate storm sewer systems, construction

projects, and industrial facilities. These permits contain limits on the amount of pollutants that can be contained in each facility's discharge.

State Water Resource Control Board Storm Water Strategy

The Storm Water Strategy is founded on the results of the Storm Water Strategic Initiative, which served to direct the SWRCB's role in storm water resources management. The Storm Water Strategy developed guiding principles to serve as the foundation of the storm water program; identified issues that support or inhibit the program from aligning with the guiding principles; and proposed and prioritized projects that the Water Boards could implement to address those issues. The SWRCB staff created a strategy-based document called the Strategy to Optimize Management of Storm Water (STORMS). STORMS includes a program vision, missions, goals, objectives, projects, timelines, and consideration of the most effective integration of project outcomes into the SWRCB's Storm Water Program.

California Integrated Waste Management Act (AB 939 and SB 1322)

The California Integrated Waste Management Act of 1989 (AB 939 and SB 1322) requires every city and county in the state to prepare a Source Reduction and Recycling Element to its Solid Waste Management Plan that identifies how each jurisdiction will meet the mandatory state waste diversion goals of 25% by 1995 and 50% by 2000. The purpose of AB 939 and SB 1322 is to "reduce, recycle, and re-use solid waste generated in the state to the maximum extent feasible." The term "integrated waste management" refers to the use of a variety of waste management practices to safely and effectively handle the municipal solid waste stream with the least adverse impact on human health and the environment. The Act has established a waste management hierarchy, as follows: Source Reduction; Recycling; Composting; Transformation; and Disposal.

SB 1374 (Construction and Demolition Waste Materials Diversion)

Senate Bill 1374 (SB 1374), Construction and Demolition Waste Materials Diversion Requirements, requires that jurisdictions summarize their progress realized in diverting construction and demolition waste from the waste stream in their annual AB 939 reports. SB 1374 required the CIWMB to adopt a model construction and demolition ordinance for voluntary implementation by local jurisdictions.

California Green Building Standards Code (CALGreen)

CALGreen requires the diversion of at least 50 percent of the construction waste generated during most new construction projects (CALGreen Sections 4.408 and 5.408) and some additions and alterations to nonresidential building projects.

CALGreen became mandatory on January 1, 2011. The 2012 Supplement became effective on July 1, 2012, the 2013 CALGreen became effective on January 1, 2014, and the 2016 CALGreen became effective on January 1, 2017.

As of January 1, 2017, in all jurisdictions including those without a construction and debris ordinance requiring the diversion of 65 percent of construction waste, the owners/builder of construction projects within the covered occupancies are required to divert 65 percent of the construction waste materials generated during the project. Additionally, CALGreen allows a disposal reduction option that can be met when the project's disposal rate is less than 2.0 pounds per square foot for non-residential and high rise residential, or less than 3.4 pounds per square foot for low-rise residential.

Local

4.18.2.2 Existing Conditions

Water Service

Potable Water

The City of Vernon is served by three water agencies. The majority of the City's water is provided by the City of Vernon's Water Department. The area north of the Los Angeles River and just west of Indiana Street is supplied by the California Water Service Company (Cal Water), East Los Angeles District. The small portion of Vernon south of the Los Angeles River and east of Atlantic Boulevard is serviced by Maywood Mutual Water Company Number 3. The Project would be served by the City of Vernon's Water Department.

The City's water distribution system consists of 250,000 linear feet of pipe, nine wells, seven ground-level reservoirs, one elevated tank, and a belowground reservoir. The total storage capacity is 16 million gallons. In addition, Vernon has a direct connection to the Metropolitan Water District (MWD). The MWD connection provides both a supplemental water source and an emergency supply in the event of a major power outage.

The Water Service Division serves more than 800 customers and distributes approximately 2.2 billion gallons of water annually. The majority of the water used in the City is supplied from the Water Service Division and is used by industrial businesses. There is currently very little residential or landscaping demand for water. The City of Vernon's water rates are amongst the lowest in the Los Angeles region, which provides the City a competitive advantage for industrial uses.

The water in Vernon is imported from the Central Basin Municipal Water District (CBMWD), and includes groundwater from the Central Basin, and recycled water for power generation from CBMWD. CBMWD provides recycled water from Los Angeles County Sanitation District's (LACSD) wastewater.

Wastewater

The City of Vernon owns its own sewage collection system, which discharges into system managed by LACSD. LACSD is a public agency created under State law to manage wastewater and solid waste on a regional scale. LACSD consists of 24 independent special districts across the County of Los Angeles. Vernon is located primarily in LACSD Districts No. 23, with small portions in Districts No. 1 and No. 2. These Districts are participants of a Joint Outfall Agreement, which provides for the operations and maintenance of an interconnected Joint Outfall System (JOS). The JOS utilizes seven treatment plants and over 1,200 miles of trunk sewers that provides regional wastewater treatment for Los Angeles County, covering an extensive area that includes 73 cities and unincorporated county territory. The City of Vernon is served by Joint Water Pollution Control Plant (JWPCP) in Carson, CA. The JWPCP is the hub of the JOS. It is the largest facility on the system. It provides centralized processing of solids removed during wastewater treatment for all of the JOS plants, producing electricity and reusable biosolids in the process.

Storm Drainage

The City's existing drainage system is comprised primarily of channelized creeks fed by surface runoff and underground storm drains. The City maintains the system within incorporated areas.

Under the Federal Clean Water Act, each municipality throughout the nation is issued a stormwater permit through the National Pollutant Discharge Elimination System (NPDES) program. The primary goal of each Stormwater permit is to stop polluted discharges from entering the storm drain system and local receiving and coastal waters. In California, the NPDES stormwater permitting program is administered by the State Water Resources Control Board (SWRCB) through its nine Regional Boards.

The requirement to implement the Permit is based on federal and state statutes, including Section 402(p) of the Federal Clean Water Act, Section 6217 of the Coastal Zone Act Reauthorization Amendments (CZARA) of 1990, and the California Water Code. The Federal Clean Water Act amendments of 1987 established a framework for regulating stormwater discharges from municipal, industrial, and construction activities under the NPDES program. The primary objectives of the stormwater program requirements are to:

- Effectively prohibit non-stormwater discharges, and
- Reduce and eliminate the discharge of pollutants from stormwater conveyance systems to the Maximum Extent Practicable statutory standard.

On November 8, 2012, the Regional Board adopted Order No. R4-2012-0175 (Municipal NPDES Permit). The Municipal NPDES Permit requires the Permittees to implement Low Impact Development under the Planning and Land Development Program provision.

In November 2013, the City of Vernon amended Chapter 21, Article V Storm Sewer System of the Municipal Code to include stormwater pollution controls for specific new development and redevelopment projects termed Planning Priority Projects (Ordinance No. 1216). The purpose of the provisions in Chapter 21 is to enhance and protect the water quality of the receiving waters of the United States in a manner that is consistent with the Clean Water Act and the Municipal NPDES Permit. The intent of Chapter 21 is to protect and control the City's sanitary sewer system; and to reduce Stormwater and urban runoff pollutants by improving the quality of Stormwater that are discharged into the regional Stormwater system within Los Angeles County known as the municipal separate storm sewer system (MS4).

The project disturbs approximately 11.4 acres, which falls in the category of "planning priority projects" as "All development projects equal to 1 acre or greater of disturbed area that adds more than 10,000 square feet of impervious surface area". The project is subject to comply with the following pursuant to City of Vernon Municipal Code Chapter 21:

- Retain stormwater runoff onsite for the Stormwater Quality Design Volume (SWQDv) defined as the runoff from:
    - The 85th percentile 24-hour runoff event as determined from the Los Angeles County 85th percentile precipitation isohyetal map; or
    - The volume of runoff produced from a 0.75 inch, 24-hour rain event, whichever is greater.
- If partial or complete onsite retention is technically infeasible, the project Site may biofiltrate 1.5 times the portion of the remaining SWQDv that is not reliably retained onsite. Biofiltration BMPs must adhere to the design specifications provided in the MS4 Permit.
- The remaining SWQDv that cannot be retained or biofiltered onsite must be treated onsite to reduce pollutant loading. BMPs must be selected and designed to meet pollutant-specific benchmarks as required per the MS4 Permit.

GEP proposes to use underground stormwater biofiltration system called MWS as Best Management Practice (BMP) to treat all onsite stormwater runoff. The MWS is a biofiltration system that utilizes horizontal flow within a small footprint to reach high treatment capacity and design versatility that helps with the project's restraints on infiltration due to soil characteristics. The MWS is comprised of a prefabricated concrete unit that contains pretreatment chamber, biofiltration chamber, overflow weir and overflow chamber. Roof runoff will be routed through scuppers and connect to underground storm drain system. Surface runoff of hardscape such as concrete sidewalk and asphalt

driveway and parking stalls will sheet flow and be collected in various catch basins at low spots and then routed to the underground storm drain system. Multiple MWSs are located at the downstream side of the storm drain system before discharging offsite to treat all onsite runoff. The MWS is sized to treat 1.5 times the SWQDv. During larger storm events, overflow will discharge to the City owned 15~18-in storm drain along East Vernon Ave at four outlets. Refer to C05-01 Utility Plan and C06-01 LID plan for detailed design.

Solid Waste

The City and its businesses have contracts with various different waste haulers. These haulers utilize several different waste transfer stations within the region, which transport the waste to two different landfills. The total daily capacity for the transfer stations serving the City of Vernon is 41,963 tons per day. Additionally, green waste, wood waste, compost, and mulch within the City are processed at Green Wise Soil Technologies. After solid waste and recycling are processed at the various waste transfer stations.

They are generally hauled to two landfills in the region: Sunshine Canyon Landfill in Sylmar, and the Simi Valley Landfill in Simi Valley. Additionally, a portion of green waste, wood waste, and compost in the City are processed at Green Wise Soil Technologies.

Electricity

The City of Vernon operates its own electrical service through the Vernon Public Utilities (VPU) Department. According to the VPU's 2023 Integrated Resource Plan, VPU serves approximately 2,000 mainly commercial and industrial customers and has a peak load of approximately 189 MW in the summer and 174 MW in the winter. Vernon system peak load is served in part by two generation facilities that are located within the VPU Department service territory: the Malburg Generating Station (MGS), a 139 MW natural gas-fired plant and two H. Gonzales units, a combined 11.5 MW natural gas plant. In addition to local generation, the VPU Department purchases energy to supply its 189 MW system demand from long-term agreements including the Palo Verde Nuclear Generating Station, Hoover Dam, solar generating facilities, landfill gas facilities, and from short-term power purchases. The VPU Department provides comparatively low-cost electrical power, giving industrial and commercial uses in the City a competitive advantage.

4.18.3 Environmental Impact Discussion

For purposes of analyzing potential utility related impacts, it is not necessary or prudent to separate the potential impacts of the VBGF and the GEP. Therefore, the following analysis uses the term "Project" which encompasses both construction and operation of the VBGF, the GEP and all related ancillary facilities.

4.18.3.1 Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects

The Project would not require new or expansion of water, wastewater or stormwater drainage facilities. The primary delivery of potable water for the project would be made through connecting to an existing 12 inch main pipeline located adjacent to the site in East Vernon Avenue.

Wastewater will be interconnected to two existing main pipelines also located adjacent to the Site in East Vernon Avenue. Specifically, Building 1 will extend four (x4) 6-inch laterals to the existing 15-inch main and Building 2 will extend four (x4) 6-inch laterals to the existing 8-inch main. Both sewer mains are sized adequately for the GEP Site.

Stormwater drainage improvements will be on-site and discharged to the existing 15~18-in storm drain along East Vernon Ave at four outlets.

While the facility would require a new electrical interconnection to the VPU, the interconnection facilities are described in this SPPE application. As demonstrated in each subsection in this Section 4, these facilities do not result in significant impacts. (**Less Than Significant Impact)**

4.18.3.2 Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

As described in Section 2.3.11.1 the Project would use approximately 1.75 acre feet of water over the 16 month construction period. As described in Section 2.3.10.2 the Project would use approximately 9 AFY of potable water to include indoor uses, humidification and landscaping during operations. GIC Vernon has filed applications with the City of City to facilitate potable water service for the Project. The City has explained that it has sufficient capacity to serve the Project. GIC Vernon has requested a letter from the City demonstrating its ability to serve the Project potable water and when received they will be provided under separate cover. It should be noted that the Project does not need a Water Supply Assessment pursuant California Water Code Section 10910 because it does not meet any of the requirements outlined in California Water Code Section 10912.

Therefore the Project would have a sufficient water supply and would result in less than significant water supply related impacts. **(Less Than Significant Impact)**.

4.18.3.3 Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Wastewater from the Project would be collected by the City's local system of sewer lines and conveyed through regional trunk lines operated by LACSD. All of Vernon's wastewater is treated by the JWPCP, located at 24501 S Figueroa Street in the City of Carson. The JWPCP provides both primary and secondary treatment for approximately 260 million gallons of wastewater per day (MGD) and has a total permitted capacity of 400 MGD. Treated effluent is then discharged from JWPCP through an ocean outfall.

As described in Section 2.3.10.2 Table 2 the predicted wastewater flow from the Project would be approximately 5,750 gpd or approximately 0.0001 percent of the current JWPCP capacity. Therefore the Project will not result in a significant wastewater related impact. **(Less Than Significant Impact).**

4.18.3.4 Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Solid waste generated by the Project would be transported to Sunshine Canyon Landfill in Sylmar or the Simi Valley Landfill for disposal. The Sunshine Canyon Landfill has a has a max throughput capacity of 12,100 tons per day. The Sunshine Canyon Landfill has a permitted capacity of 140,900,000 cubic yards, with a remaining capacity of approximately 66,200,000 cubic yards. It is anticipated to be in operation until 2037[1]. The Simi Valley Landfill a has a max throughput capacity of 64,750 tons per week. The Simi Valley Landfill has a permitted capacity of 119,600,000 cubic yards, with a remaining capacity of approximately 79,783,835 cubic yards. It is anticipated to be in operation until 2063.[2]

Based on data from CalRecycle, a generic manufacturing/warehouse facility would generate approximately 1.42 pounds of solid waste per 100 square feet of building area per day.[3] Using this rate, the GEP would generate approximately 8.060 pounds of waste

[1] CalRecycle. SWIS Facility/Site Activity Details: Sunshine Canyon City/County Landfill (19-AA-2000). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/259?siteID=4702

[2] CalRecycle. SWIS Facility/Site Activity Details: Simi Valley Landfill & Recycling Center (56-AA-0007). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/608?siteID=3954

[3] CalRecycle. "Estimated Solid Waste Generation Rates". https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates

per day. This is a very conservative estimate and represents a diminish amount of additional waste to either the Simi Valley or Sunshine Canyon throughput.

Because the project can be served by a landfill with capacity and would not result in a significant increase in solid waste or recyclable materials, the project's impacts related to solid waste would be less than significant. **(Less than Significant Impact)**

4.18.3.5 Would the project be noncompliant with federal, state, and local management and reduction statutes and regulations related to solid waste?

The construction and operation of the project would comply with federal, state, and local regulations related to diversion of materials from disposal and appropriate disposal of solid waste. **(Less than Significant Impact)**

4.18.4 Project Design Measures

No mitigation measures are necessary because the project will not cause adverse effects on existing utilities and service systems.

4.18.5 Government Agencies

The City of Vernon has regulatory authority over the utilities and service systems analyzed in this section and will impose requirements as necessary as part of its permit review and implementation process.