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LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
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April 4, 2017

Mr. Richard Claghorn  
County of Los Angeles Department of Regional Planning  
Zoning Permits North Section, Room 1348  
320 West Temple Street  
Los Angeles, CA 90012

Dear Mr. Claghorn:

**COMMENTS ON FINAL ENVIRONMENTAL IMPACT REPORT - CHIQUITA CANYON  
LANDFILL - SCH No. 2005081071 - MASTER PLAN REVISION PROJECT NO.: R2004-  
00559-(5)**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the Final Environmental Impact Report (FEIR) for the Chiquita Canyon Landfill Master Plan Revision, Project No. R2004-00559-(5), which was released to the public on February 16, 2017, and the following comments are offered:

**Chapter 1: Introduction**

- **In section 1.4, Project Need**, the Task Force has previously provided comments on this section during the initial release of the Draft Environmental Impact Report (DEIR) 2014 and subsequently in 2017 during the partial recirculation of the DEIR. The provided comments requested for in-depth discussions to substantiate the need for the expansion of the existing Chiquita Canyon Landfill (Landfill) taking into consideration the potential impacts on the Project Need from various legislative proposals specially SB 32 and SB 1383 (2016). Based on the FEIR, the Task Force believes the environmental document has not adequately addressed the issues. SB 32, among other things, requires landfill GHG emission to be reduced to 60% of the year 1990 level by 2030. Further, the newly enacted SB 1383, among other GHG reductions, requires all jurisdictions in California to reduce the amount of organic waste landfilled by 75% by the year 2025 as compared to the amount disposed of in 2014. This comment needs to be fully addressed in the FEIR.

Similarly, the Task Force, in its 2014 and 2017 letters, has previously requested the environmental document to incorporate a detailed discussion in this Chapter as how the proposed Project would meet the siting criteria as specified in the June 1997 Los Angeles County Countywide Siting Element (Volume I – The Element, Chapter 6, Facility Siting Criteria). This comment is yet to be addressed as well. The Siting Element Document was set up to ensure jurisdictions in Los Angeles County have adequate disposal capacity to manage their waste disposal needs. It also ensures the identified facilities are safely operated and appropriated sited under the required siting criteria. Thus, it is crucial for the environmental document to discuss and provide details how these criteria were met. The information would allow the residents as well and responsible agencies to make an informed decision about the project.

## **Chapter 2: Project Description**

- The FEIR needs to specify the locations of any potential long term soil stockpile areas including the duration of the stockpiles at those locations. Stock piling locations are important information to be identified along with all mitigation measures such as dust and erosion control. This comment needs to be fully addressed in the FEIR.

## **Chapter 11.1 Air Quality**

**Section 11.4.3 Local Regulations and Standards** – Since FEIR identified that peeling back of previous day's cover would be a standard operating procedure at the Landfill, this Section should be expanded and elaborated on how odors will be managed and contained during the peeling back process. The provided response to address this matter is insufficient as it did not explain what procedures will be considered to control the odor emitting from the peeling back process. Considering odor nuisance has significant impacts to the surrounding community, this topic needs to be fully addressed in the Final EIR.

## **Chapter 18: Project Alternatives**

- **Environmental Analysis 18.3.2.6 (Pg. 18-16).** The conclusion provided under Visual Resources Section states that “[visual] *Impacts would be less than significant*”. The provided response is contradicting with the provided visual simulations in Figures 18-3, 18-4, 18-8, 18-9 18-13 and 18-14. The visual simulation demonstrated that the landfill would substantially be increasing in height and the surrounding community such as the residents located at North and East of Hasley Canyon Road would have a clear view of the landfill. It is clear that the

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impact is significant and unavoidable. This conclusion to this section needs to be amended.

As provided by Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally-sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a Countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

If you have any questions, please contact Mr. Mike Mohajer of the Task Force at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or (909) 592-1147.

Sincerely,



Margaret Clark, Vice Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Council Member, City of Rosemead

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cc: Each Member of the County of Los Angeles Regional Planning Commission  
County of Los Angeles Department of Regional Planning (Richard Bruckner)  
Each Member of the Los Angeles County Integrated Waste Management Task Force  
Each Member of the Facility & Planning Review Subcommittee