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August 25, 2014

Ms. Iris Chi
County of Los Angeles Department of Regional Planning
Zoning Permits North Section, Room 1348
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Chi:

**COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT
CHIQUITA CANYON LANDFILL
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 Draft Environmental Impact Report (DEIR) for the Chiquita Canyon Landfill Master Plan Revision, Project No. R2004-00559-(5), which was released for public review on July 10, 2014.

The proposed Project, among other things, entails increasing the permitted daily disposal tonnage from 6,000 to 12,000 tons per day; increasing the disposal footprint laterally by 143 acres; and increasing the maximum elevation by 143 feet. As indicated in the DEIR, this would extend the existing Chiquita Canyon Landfill's life by additional 21 to 38 years, depending on the amount of the daily disposal rate. The Project also provides for the development of an on-site household hazardous facility and an open mixed organics composting operation while setting-aside a portion of the subject site for possible development of a conversion technology facility, sometime in the future.

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.

Accordingly, the Task Force has reviewed the DEIR for the proposed Project and offers the following comments:

Project Need:

Need for Landfill Capacity:

In-depth discussions substantiating the need for expansion of the existing Chiquita Canyon Landfill (Landfill) including the following key points need to be provided:

- Identify jurisdictions that currently utilize the Landfill for disposal of municipal solid waste (MSW) as well as jurisdictions to be served by the Project.
- Discuss whether any out-of-County waste will be accepted at the Landfill.
- Discuss the impacts of the full development of the Waste-by-Rail System to the Mesquite Regional Landfill by the County Sanitation Districts of the Los Angeles County on the proposed Landfill expansion.
- Address impacts from the following 2014 legislative proposals and statutes currently in effect on the need for additional landfill capacity, including, but not limited, to the following:
 - Assembly Bill (AB) 32 (the California Global Warming Solution Act of 2006 [Act]) – Mandatory commercial recycling to achieve a reduction in greenhouse gas emissions of five million metric tons of carbon dioxide (CO₂) equivalents.
 - AB 32 [Act] – Mandatory commercial organic waste recycling program if the Legislature fails to pass legislation in 2014 that would accomplish the same.
 - AB 341 (2011) – State legislative mandated policy goal of achieving a 75-percent recycling rate by the year 2020.

- AB 1594 (2014) – Beginning January 1, 2020, using green waste as alternative daily cover (ADC) would no longer constitute diversion but rather be considered disposal for purposes of AB 939. Additionally, it prohibits disposal of green material by a jurisdiction that is not in compliance with AB 939 diversion mandates
- AB 1826 – Starting April 1, 2016, it would require businesses, governmental entities and multi-family residential of five units and more that generate certain thresholds of organic waste per week to implement a mandatory commercial organic waste recycling program consistent with the requirements of the bill and the host jurisdiction. Failure of a jurisdiction (city/county) to monitor and enforce the implementation of a commercial organic waste recycling program by businesses within the said city/county may subject the jurisdiction to a daily penalty of \$10,000 even if the jurisdiction is in full compliance with the AB 939 diversion mandates. The goal of the legislation is to reduce the amount of organic waste being disposed in landfills and transformation facilities in 2014 by 50 percent by the year 2020.
- Senate Bill 498 – Revises the definition of “biomass conversion” to mean the production of heat, fuel, or electricity by the controlled combustion, or the use of other noncombustion thermal conversion technologies on biomass materials.

It should be noted that the Legislature has approved AB 1594, AB 1826, and SB 498 and the bills need to be signed by the Governor in order for them to take effect on January 1, 2015.

Need for Development of Composting, Anaerobic Digestion, and Conversion Technology Capacity

Provide in-depth discussions and analysis for on-site development of facilities using the above processes in conjunction with the full and/or partial development of the Landfill expansion.

Chapter 1.0 (Introduction)

- **Federal, State, and Local Approvals, Section 1.5.2 (Pg. 1-12).** Table 1-3 does not specify the associated water permits under “State Water Resources Control Board” and “RWQCB,” and should be revised to include the following:
 - Stormwater Pollution Prevention Plan (SWPPP) and Stormwater Monitoring Program (SWMP) under “State Water Resources Control Board.”
 - National Pollutant Discharge Elimination System (NPDES) under “RWQCB”
- **County of Los Angeles Approvals, Section 1.5.3 (Pg. 1-12).** Include the following in addition to the required permits and approvals listed in this Section:

Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force

- Finding of Conformance with the Los Angeles County Countywide Siting Element

Siting Criteria—Incorporate a discussion regarding how the proposed Project would meet the siting criteria specified in the June 1997 Los Angeles County Countywide Siting Element, Volume I-The Element, Chapter 6-Facility Siting Criteria.

Chapter 2.0 (Project Description)

- **Lateral Extension of the Waste Footprint and Increased Maximum Elevation, Section 2.2.2 (Pg. 2-5).** The current CUP has a maximum permitted elevation of 1,430 feet, as shown in the approved Exhibit “A” Site Plan. Revise the third sentence under this Section to read, “The Proposed Project also will increase the permitted elevation of the landfill by 143 feet to a maximum elevation of 1,573 feet, including the final cover.”
- **Wastes to be Received, Section 2.2.4 (Pg. 2-6).** Clarify whether sludge and sludge components (or biosolids) are proposed to be prohibited from being accepted as part of the Project. Also, identify any other materials (e.g. friable/non-friable asbestos, radioactive and liquid waste) that are proposed to be prohibited from being accepted at the Landfill.

- **Materials Diverted from Waste Disposal and Typical Beneficial Reuse at CCL, Table 2-2 (Pg. 2-15).** If a “Mixed Organics” composting facility will be part of the Project, pre- and post-consumer food waste should be listed under the “Material Type Diverted from Waste Disposal” column in Table 2-2. Also, the description under the “Beneficial Reuse at CCL” column for pre- and post-consumer food waste, as well as Shredded Curbside Green Waste, should include “Used as feedstock for the ‘Mixed Organics’ composting facility.” Also, see comments under the Project Need Section.
- **Materials to be Diverted from Waste Disposal, Section 2.2.5 (Pg. 2-15).** Describe whether or not the 20,505 cubic yards per day of diverted materials analyzed include food waste, and whether this value is in addition to the 12,000 tons per day disposal limit. Also, see comments under the Project Need Section.
- **Load Checking and Waste Screening, Section 2.2.7.2 (Pg. 2-16).** Provide a description on how radioactive waste and odiferous loads will be checked and screened, and what measures will be implemented when such wastes or loads are identified.
- **Hours of Operation, Section 2.2.7.4 (Pg. 2-17).** According to **Section 2.2.10 Household Hazardous Waste Facility**, a HHW facility will be constructed on site. Indicate the operating days and hours of the HHW facility in this Section.
- **Disposal and Cover Procedures, Section 2.2.7.7 (Pg. 2-18).** Discuss whether the Landfill will continue the practice of removing or peeling back the daily cover at the beginning of each operation day. If such practice is proposed please indicate any potential impacts such as those pertaining to odor, vector and other quality of life issues as well as potential mitigating measures to address possible negative impacts.
- **Sewage and Water, Section 2.2.7.8 (Pg. 2-18).** Address the adequacy of the water supply to accommodate dust control and irrigation even after the Newhall Land and Farming Projects are developed. If water supply is inadequate, identify measures to mitigate any potential shortage in water supply to support landfill operations.
- **Traffic, Section 2.2.7.9 (Pg. 2-19 to 2-21).** Identify the source of traffic that would be considered “Other” outbound traffic in Tables 2-3 to 2-5. Clarify whether the outbound trucks include those hauling leachate, household hazardous waste from the HHW facility, compost materials, and comingled recyclables.

- **Excavation, Section 2.2.8.1 (Pg. 2-21).** Specify the locations of any potential soil stockpile areas including the duration of the stockpiles at those locations.
- **Excavation, Section 2.2.8.1 (Pg. 2-22).** Revise the reference in the last paragraph to reflect the correct reference regarding soil quantities.
- **Leachate Monitoring, Section 2.2.9.3 (Pg. 2-33).** Indicate whether there are any plans to install a leachate treatment facility onsite. If such a facility is planned, provide detailed information including site location, facility capacity, and any associated structures for storing treated leachate for beneficial use.
- **Nuisance and Health Hazard Monitoring, Odor, Section 2.2.9.6 (Pg. 2-35).** In concert with the Section 11.02.300 (E) of Title 11 of the Los Angeles County Code, elaborate on measures to prevent nuisances due to odors emanating from the Landfill including those related to the working face, leachate, landfill gas control system, and “Mixed Organics” composting operations. If the removal or peeling back of daily cover prior to placing waste on each operating day is being proposed discuss how odors will be managed and contained.
- **Household Hazardous Waste Facility, Section 2.2.10 (Pg. 2-41).** Indicate the duration the materials collected at the HHW facility are expected to be stored on-site, as well as the frequency of delivery of the materials, and mitigation measures to ensure the health and safety of the surrounding residents and staff.
- **Mixed Organics Composting Facility, Section 2.2.11 (Pg. 2-42).** In accordance with California Code of Regulations, Title 14, § 17863.4, “All compostable material handling operations and facilities shall prepare, implement and maintain a site-specific odor impact minimization plan. A complete plan shall be submitted to the [Enforcement Agency] with the [Enforcement Agency] Notification or permitted application.” Accordingly, describe the preparation and submittal of an Odor Impact Minimization Plan (OIMP) to the appropriate Local Enforcement Agency for review and approval. In addition, consistent with Title 11 of the Los Angeles County Code, Section 11.02.300 (E), the OIMP also needs to be submitted to the Los Angeles County Health Officer (the County Department of Public Health) for review and approval.

Chapter 3.0 General Setting and Resource Area Analysis

- **Cumulative Impacts, Section 3.2.9 (Pg. 3-4).** Table 3-1, needs to include additional information regarding the proposed residential developments in the vicinity of the Landfill, including the distance from the disposal footprint to the

nearest enclosed structures. One of the siting criterion contained in the County of Los Angeles Countywide Siting Element, which was approved by a majority of the cities containing a majority of the incorporated population, followed by the County Board of Supervisors, and CalRecycle in 1998, prohibits construction of buildings or structure on or within 1,000 feet of a land disposal facility which contains decomposable materials/waste unless the facility is isolated by an approved natural or manmade protective system. Furthermore, as a point of reference, the CUP for the Puente Hills Landfill, when in effect, contained a requirement for the disposal footprint to be at least 2,000 feet away from the residential community.

Chapter 4.0 Land Use

- **Planned Surrounding Land Uses, Section 4.5.3 (Pg. 4-4).** Provide additional analyses of some of the major residential developments within the vicinity of the proposed Project, including but not limited to the Newhall Land and Farming residential developments, which consists of approximately 7,200 units. It is imperative that the DEIR acknowledges all existing and proposed residential, educational, and immobile population developments that may be impacted by the proposed Project, and measures to protect public health and safety, and the environment.
- **Potential Impacts, Mitigation Measures, Significant After Mitigation, and Cumulative Impacts; Sections 4.6 to 4.9 (Pg. 4-4 to 4-6).** Update the information in Sections 4.6 to 4.9 to include any potential impacts and associated mitigation measures for the proposed Project. If these impacts and mitigation measures are further discussed in other portions of the DEIR, please include references to those chapters.

Chapter 5.0 Geology and Hydrogeology

- According the DEIR, there is potential for debris flow to encroach outside of the Landfill property. Please provide additional analysis to demonstrate the adequacy of the proposed mitigation measures to prevent any potential encroachments onto the proposed residential developments to the west and south of the Landfill property.

Chapter 6.0 Surface Water Drainage

- According the DEIR, there is also potential for mud flow to affect operations onsite as well as outside of the Landfill property. Provide additional analyses to

demonstrate the adequacy of the sedimentation basins at the Landfill to accommodate any increases in onsite water runoff to prevent any releases to nearby properties and existing flood plains in the vicinity of the Landfill property.

Chapter 11.0 Air Quality

- Analyses contained in this Chapter need to be consistent with the AB 32 Scoping Plan Update which was approved by the Air Resources board on May 22, 2014.
- **Criteria Pollutant Emission Impacts, Section 11.9.2.1 (Pg. 11-37).** According to the DEIR, impacts to air quality are significant and unavoidable due to water availability concerns for irrigation and dust control. However, discussions in the Water Supply, Section 14.5.2.5 (Pg. 14-6) of the DEIR concluded there is sufficient amount of water that can be used for dust control and irrigation for the Project. The DEIR needs to clarify this discrepancy.
- **Operation Impacts, Section 11.6.3.2 (Pg. 11-31).** Airborne particulate matters may be a substantial health risk to communities in the vicinity of the Landfill. Therefore, the DEIR needs to provide detailed analysis regarding the effects of wind direction and airborne particulate matters associated with operations of the Landfill and the open Mixed Organics Composting Facility. The proposed increase in elevation in combination with prevailing wind patterns may result in particulate matters being blown into existing or proposed residential, educational, and immobile population developments.
- **Operation Impacts, Section 11.6.3.2 (Pg. 11-31).** Provide additional discussions and analyses regarding any odor issues the Project may create as a result of the proposed increase in elevation and open Mixed Organics Composting Facility. If the Landfill operates at higher elevations there may be greater potential for odors to travel offsite into nearby communities.
- **Operation Impacts, Section 11.6.3.2 (Pg. 11-31).** Include additional analyses regarding any potential impacts associated with the operation of the proposed "Mixed Organics" composting operation at the Landfill, and provide any mitigation measures if found to have a significant impact.

Chapter 12.0 Greenhouse Gas Emission and Climate Change

- The analysis in this Chapter may need to be updated to be consistent with the AB 32 Scoping Plan Update which was approved by the Air Resources Board on May 22, 2014.

Chapter 15.0 Visual Resources

- Potential impacts to Visual Resources may be considered significant and unavoidable due to the proposed Newhall Land and Farming residential developments, of which 7,200 units will be constructed immediately west and south of the landfill, respectively. Mitigation measures should be proposed to minimize the view of the Landfill and/or Mixed Organics Composting operation from these future residential developments.

If you have any questions, please contact Mr. Mike Mohajer of the Task Force at 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
Mayor Pro Tem, 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)
Waste Connections, Inc. (Mike Dean, District Manager)
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Facility & Planning Review Subcommittee