



City of
SANTA CLARITA

#300

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January 9, 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:

Subject: Comments to the Partially Recirculated Draft Environmental Impact Report for the
Proposed Chiquita Canyon Landfill Expansion

The City of Santa Clarita (City) appreciates the opportunity to comment on the Partially Recirculated Draft Environmental Impact Report for the Proposed Chiquita Canyon Landfill Expansion.

On October 20, 2014, the City sent comments regarding the Draft Environmental Impact Report (DEIR) for the proposed expansion of the Chiquita Canyon Landfill, located on the north side of the intersection of Highway 126 and Henry Mayo Drive, approximately seven miles west of the City boundary. The project site is of interest to the City because it is located in the Santa Clarita Valley and provides solid waste disposal services to the City and the region. The proposed project consists of the development of an additional 143 acres of land to the existing landfill currently in operation.

The City would like to thank you for your consideration and inclusion of the following comments on the DEIR prepared for the project:

Water Quality (WQ)

WQ1. Design and construct the liner system and the Leachate Collection and Removal System in accordance with the Construction Quality Assurance Plan, as approved by the Regional Water Quality Control Board (RWQCB).

WQ2. Install and maintain a network of monitoring wells per the requirements of the RWQCB permit. Continue monitoring and data reporting in accordance with the Monitoring and Reporting Program, as approved by RWQCB.

WQ3. Design and construct permanent Best Management Practices (BMPs) to ensure site runoff does not adversely affect the Santa Clara River or downstream habitat in accordance with the

300-1

RWQCB permit, the Los Angeles Department of Public Works Standard Urban Stormwater Mitigation Plan requirements, and the Los Angeles County Low Impact Development Ordinance.

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cont'd

Household Hazardous Waste Facility (HHWF)

Public Access to the Proposed Household Hazardous Waste Facility for Santa Clarita Residents

The project would establish a Household Hazardous Waste Facility to be open for the public to drop off common household chemicals for proper recycling and disposal. To best serve Santa Clarita residents, the City requests the facility maintain weekend operating hours to ensure the community has access to drop off materials outside of normal business hours.

300-2

Mixed Organic Composting Facility

Support the City's Daily Efforts to Divert Organic Material from the Landfill

The project should be required to maintain the continued use of an onsite green waste processing and composting operation, which is still part of the current conditional use permit for the site. The permitted volume is currently set at 560 tons per day. The City is requesting a minimum of 100 tons per day of that capacity to be set aside to accept material from the City's curbside green waste program. If the landfill allows pre- and post-consumer food waste as part of a future "mixed organic" collection program, the City is requesting an additional 20 tons per day of commercial food waste generated in the City to receive priority status as feedstock for the program. Assisting the City and local businesses with this effort will minimize the risk of organics unnecessarily being landfilled.

300-3

Hazards/Hazardous Materials (HM)

As a Class III disposal facility, Chiquita Canyon Landfill is prohibited from disposing of hazardous waste, sewer sludge, or radioactive waste. Inclusion of the following additional mitigation measures to provide public assurance of ongoing compliance with this prohibition is recommended.

HM1. Continue to implement a rigorous load checking program in accordance with RWQCB and the Solid Waste Facility Permit requirements to ensure no illicit hazardous materials are accepted for disposal.

300-4

Air Quality (AQ)

Protecting air quality from adverse impacts from landfill gasses is implemented by means of a Landfill Gas Monitoring Program, as required by the South Coast Air Quality Management

300-5

District (SCAQMD), the Environmental Protection Agency (EPA), and CalRecycle (formerly the California Integrated Waste Management Board). Inclusion of the following additional mitigation measures to provide public assurance of ongoing compliance with air quality requirements is recommended.

AQ1. Continue and expand the landfill gas collection system in accordance with the requirements of the SCAQMD permit, EPA New Source Performance Standards/Emission Guidelines, and Landfill Methane Capture regulations.

AQ2. Continue monthly monitoring of perimeter probes, onsite facility monitoring and landfill surface monitoring for landfill gases, and ambient air sampling at the landfill site boundaries in accordance with the approved SCAQMD Rule 1150.1 Compliance Plan, EPA Emissions Guidelines, and CalRecycle Title 27 monitoring requirements.

300-5
cont'd

The City requests further consideration and inclusion of the following comments on the Partially Recirculated DEIR prepared for the project also included in the letter dated October 20, 2014:

Traffic and Transportation

The traffic analysis indicates there would be a 594 truck increase in daily traffic into and out of the landfill site with the proposed expansion. This additional traffic will cause increased traffic congestion and vehicular delay for residents and employees who live and/or work in the City, based on the proposed project trip distribution of 85 percent to/from the south on Interstate 5 and seven percent to/from the east on Newhall Ranch Road. Of particular concern is the fact the majority of the projected increase in traffic will consist of trucks, which create more congestion than an equal number of smaller vehicles. In addition, 16 percent of the increased traffic is projected to occur during the peak morning commute period (6:00 a.m. to 9:00 a.m.), which will cause increased delay for motorists traveling southbound on Interstate 5 through the Santa Clarita Valley.

Due to the projected increases in traffic and the anticipated effects, the City is requesting preferred disposal rates and priority access to the landfill to offset the anticipated effects on Santa Clarita Valley residents. In addition, the City would like the landfill operator to partner with the City to implement the annual Bike to Work Day and Rideshare events. These events aim to reduce traffic in the Santa Clarita Valley by encouraging alternative forms of transportation and carpooling. A sponsorship from the landfill in the amount of \$5,000 for each event on an annual basis would assist the City with planning and promoting the events, educating local residents, and reducing overall traffic congestion.

300-6

Hazards/Hazardous Materials (HM)

HM2. Continue to implement all load checking requirements of the California Department of Toxic Substances Control and the California Department of Public Health to ensure no sewer sludge or radioactive materials are accepted for disposal.

300-7

HM3. Utilize recognized BMPs for temporary storage and handling of household hazardous waste prior to shipping materials to recycling facilities or approved hazardous waste disposal sites.

Landfill Operation

Origin of Solid Waste

The project proposes an increase in the amount of staffing to operate the landfill that will include additional workers at the scale house. With the increased staffing levels, the City requests all landfill customers have their full waste origin recorded, including the street name and number, city, and zip code for each load brought to the facility. Having the additional information recorded will enhance the accuracy of the waste origin. Currently, the landfill operator is recording only the jurisdiction's name.

300-8

Materials Recovery Facility (MRF)

Eliminate the Acceptance of Self-haul Materials from the Public

The current conditional use permit allows the landfill operator to construct a Materials Recovery Facility (MRF) at the landfill site. If the operator decides to build a facility or if a local MRF is constructed in the Santa Clarita Valley, the City requests the landfill operator to be required to eliminate the acceptance of self-haul waste to increase diversion and recycling. This change in operation will reduce the possibility of waste being misallocated to the wrong jurisdiction of origin.

300-9

MRF Specifications

If the operator decides to build a facility or if a local MRF is constructed in the Santa Clarita Valley, the City further requests the MRF to include the following features:

- Transfer tipping area and load out
- Residential/commercial single stream processing system for comingled recyclables
- Commercial mixed waste sorting system
- Certified California buy-back center
- Reuse center for the public
- Minimum receiving capacity of at least 1,000 tons per day

300-10

Mr. Richard Claghorn
January 9, 2017
Page 5 of 5

In addition to the 2014 comments provided by staff, the City of Santa Clarita proposes for consideration and inclusion:


Greenhouse Gas Emissions and Climate Change

The project is outside of the jurisdiction of the City and not applicable to the City's Climate Action Plan. However, the City would urge that the project meet or exceed all requirements of the Community Climate Action Plan adopted by the County of Los Angeles, as well as any and all state and/or federal laws pertaining to Greenhouse Gas Emissions.

300-11

The City appreciates the opportunity to comment on the Proposed Chiquita Canyon Landfill Expansion Project Partially Recirculated DEIR. If you have any questions, please contact me at (661) 255-4337.

Sincerely,


Travis Lange
Environmental Services Manager

TL:CW:ll

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cc: Santa Clarita City Council
Santa Clarita Planning Commission
Leadership Team
Rosalind Wayman, Senior Deputy, Office of Supervisor Barger
Edel Vizcarra, Planning Deputy, Office of Supervisor Barger

Letter No. 300

City of Santa Clarita
Travis Lange, Environmental Services Mgr.
23920 Valencia Blvd., Ste. 300
Santa Clarita, CA 91355-2196

Response to Comment No. 300-1

As pointed out by the City of Santa Clarita in Comment Letter 52, protection of groundwater quality is mandated by stringent Regional Water Quality Control Board (RWQCB) permitting requirements. Each of the proposed mitigation measures are operating practices already required for a Class III landfill via various regulatory mechanisms and do not reflect measures needed to mitigate potentially significant impacts. Please also see Topical Response #30 for a discussion of Water Quality.

Response to Comment No. 300-2

Please see Topical Response #13 for a discussion of the Household Hazardous Waste Facility (HHWF). The HHWF may be operated by Los Angeles County or a third party selected by the County. Exact days and hours of operation will be set by the County, but weekend operation is anticipated.

Response to Comment No. 300-3

The Proposed Project includes a potential onsite green waste processing and composting operation, and CCL is interested in assisting the City and local businesses with efforts to minimize landfill disposal of organics.

Any discussions between CCL and the City of Santa Clarita regarding capacity set-aside for the City or priority status for the City would be conducted outside of the environmental review process for the Proposed Project.

Response to Comment No. 300-4

The recommended mitigation measure is an operating practice already required for a Class III landfill via various regulatory mechanisms and does not reflect a measure needed to mitigate potentially significant impacts. Please also see Topical Response #29b for a discussion of the Waste Screening and Acceptance Program at CCL.

Response to Comment No. 300-5

The recommended mitigation measures are operating practices already required for a Class III landfill via various regulatory mechanisms and do not reflect measures needed to mitigate potentially significant impacts. Please also see Topical Response #1 for a discussion of Air Quality.

Response to Comment No. 300-6

There is no nexus between the request for preferred disposal rates and priority access to the landfill and the potential for increased traffic in the Santa Clarita Valley.

Discussions between CCL and the City of Santa Clarita regarding the provision of additional community benefits for Bike to Work Day and Rideshare events will be conducted outside of the environmental review process for the Proposed Project.

Response to Comment No. 300-7

The recommended mitigation measures are operating practices already required for a Class III landfill via various regulatory mechanisms and do not reflect measures needed to mitigate potentially significant impacts. Please also see Topical Response #29b for a discussion of the Waste Screening and Acceptance Program at CCL.

Response to Comment No. 300-8

Additional staff required for the Proposed Project does not include additional staffing at the scalehouse. In fact, in the future, scalehouse operations may become automated for its commercial customers, where commercial drivers gain access to the landfill via use of RFID (radio frequency identification) devices, or similar.

CCL will investigate means of acquiring the requested information from self-haulers who indicate their waste origin in the City of Santa Clarita, for use by the City of Santa Clarita, in such a way that queue time at the scalehouse is not impaired. Any means of acquiring such information must be compatible with current transaction times at the scalehouse and administrative responsibilities.

Response to Comment No. 300-9

The Proposed Project does not include construction or operation of a Materials Recovery Facility at CCL.

To reduce the possibility of waste being misallocated to the wrong jurisdiction of origin, CCL will investigate means of acquiring the requested information from self-haulers who indicate their waste origin in the City of Santa Clarita, for use by the City of Santa Clarita, in such a way that queue time at the scalehouse is not impaired. Any means of acquiring such information must be compatible with current transaction times at the scalehouse and administrative responsibilities. "

Response to Comment No. 300-10

The Proposed Project does not include construction or operation of a Materials Recovery Facility at CCL.

Response to Comment No. 300-11

CCL complies with all current laws and regulations related to greenhouse gas emissions. Mitigation Measure GHG-1, which requires that CCL prepare and submit for approval a Greenhouse Gas Emissions Reduction Plan, which would incorporate new waste management strategies for the management of greenhouse gas emissions at CCL on a 5-year interval throughout the life of the Proposed Project.