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May 14, 2014

Ms. Debra Bogdanoff
Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, CA 90601

Dear Ms. Bogdanoff:

**March 2014 DRAFT ENVIRONMENTAL IMPACT REPORT
PROPOSED SCHOLL CANYON LANDFILL EXPANSION PROJECT
STATE CLEARINGHOUSE NO. 2007121023**

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 proposed Scholl Canyon Landfill Expansion Project, which was released for public comment on April 1, 2014. Based on our review of the DEIR, we have the following comments:

Aesthetics

- It has been stated in Table 1-2, "Summary of Impacts, Mitigation Measures and Level of Significance After Mitigation" (page 1-11); as well as Section 6.1.5 "Mitigation Measures," Subsections 6.1.5.1 and 6.1.5.2 (page 6.1-22); and Section 12.1 "Mitigation Measures for Aesthetics," Subsections 12.1.1 and 12.1.2 (page 12-1) that "All lighting associated with the landfill shall be non-intrusive to adjacent and surrounding land uses." The report should provide detailed discussions on how to ensure lighting would be made non-intrusive to adjacent and surrounding land uses.

Air Quality

- Section 1.2.2.4, "Environmental Impacts Associated with the Project," Subsection "Air Quality" (page 1-6), and various other sections of the DEIR state that implementation of the proposed project would result in less than significant impacts related to objectionable odors. Considering air quality could potentially be substantially impacted as the level of fill rises above the natural ridgelines, the DEIR should address potential odor impacts to the surrounding communities and associated mitigation measures.

- Section 6.2.1.2, “Environmental Setting,” Subsection “Regional Climate” (page 6.2-9), states “summer rainfall usually consists of widely scattered thundershowers near the coast.” Generally, there are no widely scattered thundershowers near the coast during the summer in Los Angeles County, although there may be occasional summer showers at higher elevations in the San Gabriel Mountains. Furthermore, thunder implies lightning. However, there is typically very little to no lightning in the Los Angeles Basin. Additionally, the following statement in the fourth paragraph of this section, “heavy clouds associated with summer storms minimize ozone production,” needs to be substantiated with respect to describing summer weather in Los Angeles County.
- Section 6.2.1.2, “Environmental Setting,” Subsection “Existing Regional Ambient Conditions,” Table 6.2-2 SCAB Attainment Status, shows the current State and Federal assessments of the air quality in the South Coast Air Basin (SCAB). Considering air pollutants will be added during the construction of the expansion and operation of the landfill, the DEIR needs to address increased particulate pollution generated from both the construction of the expansion as well as on-going operations. Higher elevations also increase exposure to regional and local wind conditions and to the effects on the surrounding residential developments.
- Section 6.2.1.2, “Environmental Setting,” Subsection “Landfill Activities and Emission Sources” (page 6.2-12), states “When the compressor station is out of service a system of 12 conventional flares provides backup means of combusting any excess LFG.” Since the Landfill has only one active compressor facility that sends the landfill gas to the nearby power plant it is recommended to secure a backup compressor unit in the event of emergencies.
- Section 6.2.3.1, “Methodology Related to Criteria Pollutants” (page 6.2-18), states there will be the same number of mobile units and gas-collection and processing equipment and the same amount of waste that will be accepted (3400 tons per day) and therefore, there are no impacts related to criteria pollutants and the “No Project Alternative” is considered. However, this statement lacks accuracy as the landfill will be filled 180-feet higher than the surrounding ridgelines. Furthermore, there will be no additional infrastructure for controlling air and water pollution as part of the proposed expansion according to this Section. The DEIR must address the need for additional gas collection lines, flares, expansion of leachate collection systems and additional processing facilities to accommodate the proposed expansion.

Biological Resources

- Section 1.2.2.4, “Environmental Impacts Associated with the Project, Biological Resources” (page 1-6), states “Variation 2 would result in the removal of 6.7 acres of previously undisturbed chaparral vegetation which is within the 9-acre hillside cut area. Following this analysis, it was determined that Variation 2 would result in less than significant impacts related to wildlife movement corridors and tree protection ordinances. However, implementation of Variation 2 has the potential to result in significant adverse impacts related to nesting habitat for some bird species protected under the Migratory Bird Treaty Act.” This matter needs to be addressed by the DEIR.

In the same section, a mitigation measure addressed that migrating birds that traditionally used this location for resting, nesting and raising their young may do it once more before start of the construction. However, if Variation 2 is approved, it should be with a mitigation that provides protection nearby such as parks or preserves of comparable acreage and similar pristine chaparral habitat for these protected animals.

- The statement regarding Significant Ecological Areas (SEA) numbers 37 and 40 is incorrect according to the proposed revised LA County General Plan final draft, which can be accessed at http://planning.lacounty.gov/assets/upl/project/gp_2035_Appendices_E_2014.pdf Based on the proposed Revised General Plan, the area is an SEA because it contains examples of biotic communities typical of the area where the abrupt up-thrust of the mountains meets the alluvial fans of the valleys - a natural habitat that is limited in availability in the County and the coastal Southern California region. It has a constrained connective corridor area near the Devil’s Gate Dam where the freeway underpasses provide access between the San Rafael Hills and the San Gabriel Mountains; and it supports intact remnant stands of low-elevation chaparral and scrub communities that were once more widespread within the region.
- Section 6.3.1.3, “Plants and Vegetation Communities on Site” (page 6.3-10), should include additional discussion on the need to re-vegetate most of the slopes. Also in regards to this section, the Holland Code that is referenced is out of date. The Manual of California Vegetation, second edition, is now the accepted reference.
- Various portions within Section 6.3 - Biological Resources and Attachment A of Appendix G include numerous wetland and upland species in the affected area, which indicate this may be a wetland area. Consequently, further investigation and discussion on the impact to the existing wetland species and resources need

to be included. A Wetland Delineation Plan needs to be prepared to accurately map out the impacted area. Additionally, the DEIR should address potential runoff issues due to the loss of a wetland area.

Description of the Proposed Project

- Section 1.1.1, "Project Purpose and Objectives" (page 1-1), and various other sections mention specific objectives to further develop disposal and diversion options such as alternative technologies. The DEIR should address the cumulative impacts of any alternative technology facility together with the proposed landfill expansion.

Geology, Soils, and Hydrogeology

- Section 6.5.1.6, "Seismicity" (page 6.5-3), and various other sections state "The SCLF is located in the Los Angeles region, an area of high seismicity that has a documented history of strong earthquakes." The DEIR should address the need to have an accelerometer onsite to measure earthquake/seismic ground motions, and how the facility plans to expand its current emergency plan commensurate with the proposed landfill expansion.
- Section 6.5.4, "Impacts, Slope Stability" (page 6.5-6), does not adequately address erosion control and slope stability measures. Wet winters may erode the slopes and channels, clog and damage pipes, and contribute to mudslides downstream from the landfill.
- The DEIR does not provide information regarding the underlying geology for Variation 2 since only rock rippability to 50 feet was determined by drilling. Yet the depth of the cut slope is to be 150 feet. Since there are potentially seismic faults in this area there may be a potential for liner system damage in the event a cut slope hits a fractured section of rock. Variation 2 should be redesigned before the deeper design is permitted to avoid unintended consequences to adjacent land uses.

Greenhouse Gas Emissions

- Section 1.2.2.4, "Environmental Impacts Associated with the Project" (page 1-7); as well as Table 1-2, "Summary of Impacts, Mitigation Measures and Level of Significance After Mitigation" (page 1-16); Section 6.6.4.2, "Variation 2, Construction Impacts" (page 6.6-12); and Section 7.3.6, "Greenhouse Gas Emissions," Subsection 7.3.6.2, "Variation 2" (page 7-8) state that implementation of Variation 2 would result in a less than significant impact related to the generation of greenhouse gas emissions. Although the DEIR specified a less than significant impact, mitigation measures should be explored

and specified to minimize greenhouse gas emissions during construction. Additionally, the DEIR has statistics showing the current landfill is non-compliant for particulates, ozone, and perhaps other pollutants at various times. The amount of non-compliance will increase with this expansion since the DEIR does not consider expanding the landfill gas and leachate treatment facilities.

Hazards and Hazardous Materials

- The statement in Section 6.7.1, “Existing Conditions” (page 6.7-1), “highly flammable scrub vegetation” is inaccurate when it is used to describe the native vegetation. The healthy native chaparral is much less flammable than the weeds and rye grass that are being used to revegetate the slopes. Furthermore, the statement, “the front face of the landfill has been landscaped with ornamental vegetation that is unlikely to burn,” does not address the species being referred to. The DEIR should explain in detail what makes these species less likely to burn than native vegetation. This section assumes that bare areas are safe if caught in a wildfire. In a Santa Ana wind-driven wildfire, embers and flames could very well blow through every area whether bare of vegetation or not. Moreover, if enough surface area acres are bare, there is a definite effect on the ambient temperature of the air and on surrounding communities. This in turn affects the goals of the Community Climate Action Plan, which must seek ways of lowering temperatures rather than raising them. Shrubs and trees are considered a resource for climate action plans.

Noise

- Section 6.10.5, “Mitigation Measures,” Subsection 6.10.5.1, “Variation 1,” and Subsection 6.10.5.2, “Variation 2” (page 6.10-28), includes a discussion regarding the need for an acoustical study when the daily disposal intake reaches the 2,600 tons per day level. In addition to coordinating with the City of Glendale on developing noise reduction recommendations, the DEIR should provide specific details regarding any requirements from regulatory agencies in the event the acoustical study reveals noise levels of concern.

Significant Irreversible Environmental Changes

- In Section 10.2, “Irreversible/irretrievable Environmental Changes” (page 10-1), waste conversion technologies should be considered as a way to extend the life of the landfill and provide more energy or fuel to the surrounding communities such as the Glendale area. These technologies should also be considered in Section 11.0, “Project Alternatives,” as a way to conserve natural resources such as groundwater and further carbon-sequestering values of native chaparral and to support the wildlife that depend on this habitat to survive.

Unavoidable Adverse Impacts

- Sections 8.1, "Air Quality," Subsections 8.1.1, "Variation 1," and 8.1.2, "Variation 2" (page 8-1), overlook the loss of valuable native habitats and important regional wildlife linkages during the proposed expansion, and this issue must be addressed. There is no mitigation offered other than a narrow window the year this expansion starts for any wildlife to nest, rest, feed, or travel through the expansion areas.

Appendices for the Scholl Canyon Expansion DEIR (Volume 2)

- The references used in the tables are Holland (habitat codes) 1988, Reed (wetland indicators) 1988, and CDFG (listed plants) 2003. All these references are out-of-date and are no longer acceptable due to years of ongoing peer-reviewed scientific studies. Therefore, the classifications used to determine the habitats on site and currently listed plants need to be updated to the most recent references.
- Actual data bases on observations consisted of only one "Reconnaissance Field Survey" in November 2010. It should be based on more observation to get an accurate sampling. Furthermore, any field survey in November is going to miss all the spring and summer annuals and likely short-lived perennials. Twelve of the listed native plants bloom only in spring or summer.
- Following are errors and comments on the table of plant species observed during the one "Reconnaissance Field Survey" (Attachment A):
 - Brassica nigra is a non-native invasive weed.
 - In the final totals there are 32 native plant species not 29.
 - Because Reed was used as a reference to wetland species the codes wetland indicator status column seem to bear little relation to the total sums at the end of the table.
 - The totals species for that column need to be revised to reflect the correct number of species listed on the table.
- Of the 18 non-native invasive plant species listed on Attachment A of Appendix G, 12 are highly flammable. These non-native invasive species need to be removed from the landfill site before they spread to adjacent residential areas, cause further degradation to native habitat on or adjacent to the landfill and proposed expansion, or cause wildfires if they are ignited by sparks from landfill equipment or operations.

Other Comments

- Section 4.4, "Project Approval" (page 4-6), needs to be updated to include a requirement to obtain a Finding of Conformance with the Countywide Siting Element (CSE) from the Task Force. Pursuant to the CSE, which was approved by a majority of cities in the County of Los Angeles containing a majority of the cities' population, the County Board of Supervisors, and the former California Integrated Waste Management Board on June 24, 1998, new solid waste disposal facilities, expansions of existing solid waste disposal facilities, or existing solid waste disposal facilities that institute a significant change to their operation must obtain an FOC with the CSE from the Task Force. The purpose of the FOC is to ensure that any new and/or expansions of solid waste disposal facilities in Los Angeles County, including the cities and unincorporated communities, are consistent with the CSE and its siting criteria.
- The expansion of the Scholl Canyon Landfill is included in the existing Countywide Siting Element subject to appropriate permitting and environmental review and is contingent on being environmentally sound and technically feasible. To demonstrate this, the DEIR should discuss how the expansion complies with the siting criteria, which are described in the existing Countywide Siting Element.
- Section 11.1, "Introduction" (page 11-1), states that an objective of the project is to increase diversion options and further develop disposal and alternative technology options for landfill users. Therefore diversion programs and conversion technologies should be considered as part of the project rather than as a substitute for the landfill expansion. A single conversion technology facility will rarely provide a one to one replacement for existing daily tonnage at a landfill. Conversion technology facilities are best considered as part of an integrated system that includes additional upfront processing, one or more conversion technologies, and the landfill for any residuals. Creating an integrated system will provide the maximum diversion while reducing project impacts such as greenhouse gas emissions and traffic. The discussion of conversion technologies in the DEIR should therefore be revised accordingly including any cumulative impacts of an integrated approach.

Pursuant to the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended) and Chapter 3.67 of the Los Angeles County Code, 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 with a combined population in excess of ten million. 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

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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, 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 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: City of Glendale Planning Department
California Department of Resource Recycling and Recovery
Los Angeles County Department of Public Health, LEA (Gerardo Villalobos)
Each Member of the Task Force and the Facility & Plan Review Subcommittee