



Department of
Resources Recycling and Recovery

Jared Blumenfeld
Secretary for
Environmental Protection

Scott Smithline
CalRecycle Director

October 15, 2019

Governor's Office of Planning & Research

John Arnau, CEQA Manager
OC Waste & Recycling
601 N. Ross Street, 5th Floor
Santa Ana, CA 92701

OCT 15 2019

STATE CLEARINGHOUSE

Subject: SCH No. 2019099059 – Mitigated Negative Declaration for Bee Canyon Greenery Composting Operation, Facility Number 30-AB-0469 – Orange County

Dear Mr. Arnau:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The County of Orange, OC Waste and Recycling (OCWR) Department, acting as Lead Agency, has prepared and circulated a Mitigated Negative Declaration (MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

OCWR proposes to implement a green waste composting operation at the Frank R. Bowerman (FRB) Sanitary Landfill (Facility No. 30-AB-0360) called the Bee Canyon Greenery (proposed project). The proposed project will receive a maximum of 437 tons per day (TPD) of processed green waste and agricultural material. The composting operation will be located on a 30-acre area of the landfill that is completely disturbed. These green wastes are already being received on a daily basis at the FRB Landfill. The proposed project will allow OCWR to assist Orange County cities and the county unincorporated area in meeting state recycling mandates for the recycling of organic waste materials.

The 725-acre FRB Landfill site is located in unincorporated Orange County north and within the sphere of influence of the City of Irvine and approximately 2.3 miles east of the intersection of Portola Parkway and Bee Canyon Access Road. The street address for the FRB Landfill is 11002 Bee Canyon Access Road, Irvine which is currently zoned as exempt and designated as Public Facilities and Landfill Site per the General Plan. The project site is surrounded primarily by open space, with some light industrial and residential development.

Beginning in March 2018, OCWR implemented a demonstration pilot project tiered as an Enforcement Agency Notification (EAN) Green Material Composting Operation on an existing landfill area of the FRB Landfill. The EAN is located on an approximate 1-acre area within the eastern limits of the Phase VI landfill area. This area of the landfill is not currently being used for active landfill disposal. Material feedstocks that have been composted include source separated residential curbside green waste, commercial green waste, processed green waste and wood waste. The pilot project will continue at FRB Landfill, so that OCWR can continue to learn about composting, until such time as the proposed project is fully permitted and operational.

COMMENTS

CalRecycle staff's comments on the proposed project are included below. Please ensure the comments will be addressed throughout all sections of the MND.

Permitted Daily Throughput

Limited Scope Traffic Impact Analysis (appendix G/attachment 18) includes statements of the proposed project composting 595 tons of processed green material per day which is not consistent with the Initial Environmental Study (attachment 2) evaluation of receiving 437 TPD. Please clarify the discrepancy in the daily tonnage limits.

The AB 52 Tribal Cultural Resources Consultation Letters (appendix H/attachment 19) dated October 10, 2018 and December 4, 2018 includes notice of composting a maximum of 300 TPD of green waste and wood waste; will you be informing them of the increase in tonnage from 300 TPD to a maximum of 437 TPD, which is stated as the proposed project TPD?

Permitted Traffic Volume

Limited Scope Traffic Impact Analysis (appendix G/attachment 18) states that the project would generate an average of 60 daily traffic counts versus the Initial Environmental Study (attachment 2) which states that additional traffic generated would be 22 vehicle trips. Please clarify this discrepancy in traffic volume.

Solid Waste Regulatory Oversight

The Orange County, Environmental Health Division is the Local Enforcement Agency (LEA) and is responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA, Kathy Cross, at 714.433.6270 to discuss the regulatory requirements for the proposed project.

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the MND and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

MND for Bee Canyon Greenery Composting Operation at FRB Landfill

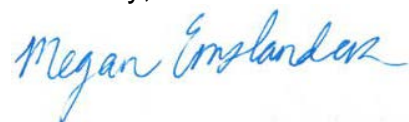
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If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6363 or by e-mail at Megan.Emslander@calrecycle.ca.gov.

Sincerely,



Megan Emslander, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Ben Escotto, Supervisor
Permitting & Assistance Branch – South Unit

Kathy Cross, Supervisor
Orange County LEA