



March 13, 2024

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STATE CLEARINGHOUSE

Nicole Steel, Project Manager
County of Santa Cruz, Department of Public Works
701 Ocean Street, Room 410
Santa Cruz, California 95060

Subject: SCH No. 2024020617 – Notice of Preparation of a Draft EIR for the Buena Vista Landfill Redevelopment Project, SWIS No. 44-AA-0004, Santa Cruz County

Dear Ms. Steel:

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 Santa Cruz, acting as Lead Agency, has prepared and circulated a Notice of Preparation (NOP) for a Draft Environmental Impact Report (EIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

Buena Vista Drive Sanitary Landfill is an existing solid waste disposal site located on 126 acres at 1231 Buena Vista Drive, in unincorporated southern Santa Cruz County. The facility is owned and operated by the County of Santa Cruz Department of Public Works.

Buena Vista Landfill is projected to reach its capacity between 2030-2034. The proposed Project would: develop two new solid waste transfer stations at the existing landfill site; develop an organics diversion facility to support organics waste processing and diversion; and implement the landfill closure plan once site capacity is reached. The proposed Project would be implemented by 2028.

COMMENTS

Solid Waste Regulatory Oversight:

- CalRecycle is the Enforcement Agency (EA) for Santa Cruz County and responsible for providing regulatory oversight of solid waste handling activities, including inspections and permitting. The proposed Project may require a permit action for the current Solid Waste Facilities Permit (SWFP), SWIS No. 44-AA-

0004, and/or may require a new SWFP(s). Please work with CalRecycle on the SWFP process.

Facility Address/Entrance:

- The current facility entrance and address for the landfill on the SWFP is 1231 Buena Vista Drive. Will the facility entrance and/or address change?

Name of Facility:

- The permitted name of the facility is Buena Vista Drive Sanitary Landfill. Please be consistent with facility names in the Draft EIR.

Specifications & Key Design Parameters:

- For **each** solid waste activity (e.g., transfer/processing, composting, in-vessel digestion) the Draft EIR will need to include analysis for the following:
 - Hours of operation, including hours of receipt of waste and ancillary hours;
 - Maximum allowed daily tonnage;
 - Maximum allowed daily traffic flow;
 - Total permitted acreage of each activity; and
 - Types and quantities of waste types allowed.
- Will the permitted boundary for the Landfill change or remain as in the current SWFP?

Transfer/Processing:

- Please see CalRecycle's CEQA homepage for more information on environmental review for solid waste handling activities:
<https://calrecycle.ca.gov/SWFacilities/Permitting/CEQA/>.
- Please see CalRecycle's website for more information on permitting a transfer/processing activity:
<https://calrecycle.ca.gov/SWFacilities/Permitting/FacilityType/Transfer/>.

Organics Diversion:

- The NOP states that there will be "an organics diversion facility." Specifically what type of solid waste activity will this be (e.g. composting, in-vessel digestion, biomass conversion, etc.)?
- The Draft EIR will need to include an analysis of all anticipated types of organics diversion facilities, including information specified in the above "Specification & Key Design Parameters" section of the comments.
- Please see CalRecycle's website for more information on organics diversion:
<https://calrecycle.ca.gov/Organics/>.

Closure and Postclosure Land Use:

- A closure SWFP will be required for final closure of the landfill. Please see CalRecycle's website for more information: <https://calrecycle.ca.gov/SWFacilities/Closure/>. The analysis should include potential impacts related to the closure construction and postclosure maintenance.
- CalRecycle's Engineering Support Branch (ESB) has indicated that the entire site should be included in the Final Closure and Postclosure Maintenance Plan (FCPCMP) as one landfill – not multiple. If final cover has been placed on the previous parts that met the standards at the time, then further closure would not be necessary unless there were issues. However, the entire site should be under the FCPCMP.
- The Redevelopment Project will need to comply with Postclosure Land Use requirements, per Title 27 California Code of Regulations (27 CCR) Section 21190. Please see CalRecycle's website for more information: <https://calrecycle.ca.gov/SWFacilities/Closure/PostClosure/>.
- For assistance with Closure, please contact ESB staff, Alfred Worcester at Alfred.Worcester@Calrecycle.ca.gov or (916) 341-6353.

Substitute Public Meeting:

- Pursuant to 27 CCR Section 21660.2, CalRecycle, as the EA, shall conduct an informational meeting for new and/or revised solid waste facility permits. Pursuant to 27 CCR Section 21660.4, the EA may substitute the informational meeting with a previously held public meeting on the same project. The County of Santa Cruz will need to conduct public hearings as part of the EIR certification process. Please work with CalRecycle staff on allowing attendance of the public hearings in order for CalRecycle to possibly use the public hearings as a substitute meeting, as part of the permit process.

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 Draft EIR and in carrying out their responsibilities in the CEQA process. CalRecycle also looks forward to working with the Lead Agency on the public meeting process.

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

If you have any questions regarding these comments, please contact me at (916) 641-6772 or by e-mail at joy.bowers@calrecycle.ca.gov.

Buena Vista Landfill Redevelopment Project
NOP Comment Letter
March 13, 2024
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Sincerely,

A handwritten signature in blue ink that reads "Joy Bowers". The signature is written in a cursive style and is contained within a rectangular box that has a light gray, textured background.

Joy Bowers, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Benjamin Escotto, Supervisor, PAB, CalRecycle.
Jared Weathers, WEEB, CalRecycle
Cathy Blair, Manager, WEEB, CalRecycle
Alfred Worcester, ESB, CalRecycle
Brian Fontes, Santa Cruz County
Martin Fletcher, RWQCB