



May 28, 2021

Governor's Office of Planning & Research

May 28 2021

STATE CLEARINGHOUSE

Mr. Hector Guerra, Chief Environmental Officer
County of Tulare Resource Management Agency
5961 S. Mooney Blvd.
Visalia, CA 93277

Subject: Draft Environmental Impact Report for the Woodville Landfill Expansion Project, SWIS No. 54-AA-0008, Tulare County SCH# 2018121007

Dear Mr. Guerra:

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 Tulare County Resource Management Agency, acting as Lead Agency, has prepared and circulated a Draft Environmental Impact Report (DEIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed Woodville Landfill Expansion (proposed project) is located at 19800 Road 152 within the unincorporated area of Tulare County. The project site is approximately 3.5 miles north of the City of Woodville, and 5 miles east of the City of Tulare, between Roads 208 and 224. The project site is approximately 525 acres, and the site is currently zoned Exclusive Agriculture. The site is surrounded by agricultural operations, dairies, and a few residential homes.

The proposed project is designed to expand the current Woodville Disposal Site/Landfill to meet the anticipated projected solid waste disposal needs in Tulare County for the next 55 years. As stated in the DEIR, the proposed project would: increase the total acreage from 160 acres to 400 acres, a 240 acre increase that would be the combination of inclusion of parcels from the east, north, northwest, and south; relocation of the scale house, gas flare, and operations facilities; changes to the operation floor; an increase in overall design capacity from 13.1 million cubic yards to 27.5 million cubic yards; and the addition of a composting activity that would process up to 50,000 cubic tons per year of organic material including food waste. Hours of operation, daily tonnage, and traffic volume are anticipated to remain the same.

COMMENTS

CalRecycle prepared a comment letter for the Notice of Preparation dated December 31, 2018. Below are additional comments based on the proposed project as described in the DEIR. Please ensure the comments are addressed throughout all sections of the DEIR.

Composting Facility: the project description ranges from 50,000 cubic tons annually to 100,000 cubic tons annually, with one statement of 4,000 tons per month/136 tons per day. Please clarify the limit of material that can be processed each year, amount received each day, and design capacity for the volume of material that may be stored on-site (including feedstock, processed material, material composting, finished compost, etc.) Please clarify the units for the amount of material that will be processed each year, is it cubic yards per year or tons per year (DEIR references cubic tons)?

Will the facility receive additional daily tonnage to accommodate the composting activity? Will the landfill receive more than the current permitted tons per day?

Please see CalRecycle's guidance on the CEQA requirements for compost activities:
<https://www.calrecycle.ca.gov/swfacilities/permitting/ceqa/documents/guidance/compost>

The EIR will need to include, but not limited to, all proposed feedstocks, type of composting process, and any daily tonnage limits. Please see Permitting Compostable Material Handling Facilities and Operations:
<https://www.calrecycle.ca.gov/SWFacilities/Permitting/FacilityType/Compost/>

The EIR includes the November 2015 JTD for the facility. This JTD will need to be updated after the CEQA process is complete to reflect all of the proposed changes. Closure and Cost Estimates will need be updated as well.

The current SWFP has a permitted total acreage of 525 acres and disposal acreage of 152.5 acres. The proposed project would allow an expansion from 160 acres to 400 acres. It is not clear what the 160 acres and 400 acres reference. Please clarify what the proposed expansion would allow. Would the proposed project allow an expansion in the permitted overall acreage or the permitted disposal acreage or both?

Please clarify and include a drawing of the currently permitted total area of 525 acres and the 152.5 disposal acres in relation to the proposed total site acreage and proposed disposal acreage.

The project description states that the proposed project would, "change [the] operation floor from 282 feet above mean sea level (MSL) to 270 feet MSL for WMU-2 and WMU-3." Please describe and define the "operation floor."

The current permitted maximum elevation for the unlined WMU is 371 feet MSL and 393 feet MSL for lined WMU cells. Please clarify the overall maximum elevation for all cells. Will there be any increase or decrease in the permitted maximum elevation for any of the cells?

Does the proposed project include a change in the final grading plan? Please include any elevation changes associated with final cover when calculating maximum elevation. The EIR should evaluate any potential impacts associated with an increase in final elevation and/or change to the final grading plan.

Implementation of the proposed project will require a revision to the existing SWFP. The revised SWFP will require action by CalRecycle. As a responsible agency, CalRecycle will be required to make a consistency finding with CEQA to support its action on the revised SWFP.

Solid Waste Regulatory Oversight

The Tulare County Department of Health Services, Division of Environmental Health is the Local Enforcement Agency (LEA) for Tulare County and responsible for providing regulatory oversight of solid waste handling activities, including inspections and permitting. Please contact the LEA, Jessica Gocke at (559) 624-7400 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 DEIR and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, public notices, and any Notices of Determination for this proposed project. CalRecycle requests being noticed of the date, time, and location of any public hearings regarding the proposed project at least 10 days in advance of the date of the approval of the proposed project by the decision making body.

If you have any questions regarding these comments, please contact me at (916) 341-6772 or joy.isaacson@calrecycle.ca.gov.

Sincerely,



Joy Isaacson

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Environmental Scientist
Permitting & Assistance Branch
Waste Permitting, Compliance & Mitigation Division

cc: Jessica Gocke, Tulare County LEA