

San Luis Obispo County Integrated Waste Management Authority

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June 24, 2011

John McKenzie, Project Manager
County of San Luis Obispo
Department of Planning and Building
976 Osos Street, Room 200
San Luis Obispo, CA 93408-2040

Subject: Recirculated Draft Environmental Impact Report
for the Cold Canyon Landfill Expansion

Dear Mr. McKenzie:

Thank you for the opportunity to comment on the Recirculated Draft Environmental Impact Report for the Cold Canyon Landfill Expansion (draft EIR). The San Luis Obispo County Integrated Waste Management Authority (IWMA) is a regional agency that includes the County, the 7 cities, and 10 special districts. Under the adopted Joint Powers Agreement the IWMA is responsible for meeting the requirements of AB 939. We have been exceeding the CalRecycle waste diversion goal since 1995 and in 2010 we diverted 69% of waste generated in San Luis Obispo County from landfills.

This draft EIR is of special interest to the IWMA in that the Cold Canyon Landfill plays a critical role in maintaining adequate landfill disposal capacity. The San Luis Obispo County Integrated Waste Management Plan Siting Element, adopted in 1995, gives priority for maintaining adequate disposal capacity to the expansion of the existing landfills. For example, the Chicago Grade Landfill was expanded in 2007 and now the Cold Canyon Landfill is in the process of expanding.

The Cold Canyon Landfill has also played a key role in achieving our diversion goals. The diversion operations at the Cold Canyon Landfill have been implemented to support the programs required in the San Luis Obispo County Integrated Waste Management Plan.

The draft EIR mitigation measure HAZ/mm-13 would require the Cold Canyon Landfill to enclose the composting operation or implement an alternative composting technology such as Anaerobic Digestion (AD) if odors continue to be a problem. On page V-199, the draft EIR includes the following quote from the CalRecycle Draft Program EIR for AD facilities: *"... the collection, transport, storage and pre-processing activities of the potentially odiferous organic substrates for digestion and the resultant digestate could produce nuisance odor at AD facilities. In addition, the siting of these digester facilities could lead to objectionable odors at off-site receptors in the vicinity."*

The above quote is from the CalRecycle Draft Program EIR for AD facilities section: "Impact 5.2: Operation of AD facilities in California could create objectionable odors affecting a substantial number of people (Significant)." What the Cold Canyon Landfill draft EIR failed to do was to include the next sentence of the quote which is: *"Mitigation measures shall be implemented in order to ensure the potential nuisance impact associated with odors would not affect a substantial number of people."*

The Cold Canyon Landfill draft EIR then goes on to say: *"... additional environmental review would likely be required. Because of these issues, odor impacts at this time would be considered significant and unavoidable (Class 1)."* This statement is not consistent with the CalRecycle Draft Program EIR for AD facilities. Based on the odor mitigation measures, the CalRecycle Draft Program EIR for AD facilities concludes: *"Impact Significance After Mitigation: Less than Significant."*

The CalRecycle Final Program EIR for AD facilities addressed, not only odor, but all the environmental impacts of AD facilities including noise and water use. In Section 1.6 Summary of Significant Impacts and Mitigation Measures it states: *"As indicated in the table, all the impacts could be mitigated to a less-than-significant level with the implementation of the mitigation measures."* Based on the CalRecycle Final Program EIR for AD facilities, CalRecycle has adopted an anaerobic digestion initiative that includes:

"It is the policy of CalRecycle to encourage the development of AD facilities in California as an alternative to the landfill disposal of organic solid waste. Specifically, as an initial measure, CalRecycle will encourage the establishment of in-vessel digesters located at existing or new solid waste facilities and in areas zoned for industrial or solid waste handling activities".

In conclusion, based on the CalRecycle Final Program EIR for AD facilities and the adopted CalRecycle AD initiative, the IWMA believes that the implementation of mitigation measure HAZ/mm-13 is consistent with CalRecycle policy. In addition implementation of this mitigation measure will result in less than significant environmental impacts in every category including odor, noise and water use, thus additional environmental review would not be required.

Sincerely,



William A. Worrell, P.E.
Manager

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