



March 2, 2020

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Governor's Office of Planning & Research

**MAR 02 2020**

**STATE CLEARINGHOUSE**

**Subject:**     **SCH No. 2020010546** – Mitigated Negative Declaration for the Eastlake  
Sanitary Landfill Expansion SWIS # 17-AA-0001– Lake County

Dear Ms. DelValle:

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 Eastlake Sanitary Landfill is located at 16015 Davis Avenue, Clearlake California and is owned, operated and managed by the Lake County Public Works Department. The proposed Eastlake Sanitary Landfill Expansion project would laterally expand the existing landfill to the north and east on properties currently owned by Lake County and South Lake Refuse, and to the south and east onto properties owned by the County. The lateral expansion areas would occupy an approximate 21.8-acre footprint, the entire expansion project would occupy approximately 36.2 acres and after full expansion would be approximately 56.5 acres. An additional approximately 14.4 acres of land outside of the disposal footprint areas will be needed for a new access road and road cuts, a new storm water basin, and soil stockpiling. The project site includes an area within eleven separate parcels (Assessor's parcel numbers [APNs] 010-053-110, 120, 130, 140, 010-008-030, 350, 390, 410, 041-224-400, 041-234-270, and 041-244-180). Parcel 010-008-350 is owned by the United States Department of the Interior (DOI), Bureau of Land Management (BLM) and is not included within the expansion area; however, the existing use within the northwest corner of this parcel will continue. The total project area is approximately 91 acres, of which 34.7 acres are occupied by the existing permitted landfill. The County also owns additional adjacent property that is not included in the permitted boundaries of the facility, but provides additional buffer zones, including APN 010-053-120, a 23.35-acre parcel northeast of the facility, and 010-008-410, a 77.20-acre parcel south of the facility.

The proposed expansion has been designed to extend the lifespan of the landfill by 22 years or more based on current and projected disposal rates. The existing Class II surface impoundment (leachate pond), LFG flare, scales and scale house and maintenance buildings would remain at their current onsite locations. Construction of an all-weather access road and stormwater detention basin would also be required.

No vertical expansion beyond currently permitted maximum fill elevations would occur with the proposed expansion. Landfill expansion (excavation and cell construction) will occur in four discrete phases.

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The final fill elevation will be at or just below 1,827 feet above MSL which is 33 feet below the currently permitted maximum elevation of 1860 feet above MSL in the existing Solid Waste Facilities Permit.

Current hours of facility operation are 7:30 a.m. to 4:00 p.m., 7 days per week, except for 12 legal holidays or any other holiday declared by the Board of Supervisors pursuant to State law. The facility is operated 353 days per year. Public hours at the Eastlake Sanitary Landfill for waste receipt are 7:30 a.m. to 3:00 p.m. The facility is open for limited hours for waste receipt from commercial franchise haulers on some holidays from 7:30 a.m. to 12:00 noon.

#### **Design Features Proposed Expansion**

Expansion Area Footprint (Plan Area) 21.8 acres

Waste Cell Excavation Volume 481,000 bank cubic yards (bcy)

Useable Airspace 1,843,000 bcy

Storm Water Basin Excavation 114,000 bcy

Disposal Capacity @ 1,200 lb/cy airspace utilization 1,106,000 tons

Additional Soil Needed (soil balance for daily/intermediate/final cover) 18,200 bcy

Additional Site Life 22 years (year 2046+)

#### **COMMENTS ON PROPOSED MITIGATED NEGATIVE DECLARATION**

- 1) Page 7 states: "The Eastlake Sanitary Landfill is currently permitted for an average daily throughput of 200 tons per day (tpd) where the daily average is calculated weekly. The County reports that there have been no exceedances of the 200 tpd permitted maximum tonnage limit since the Solid Waste Facility Permit (SWFP) was issued in August 1998, with the exception of the emergency waivers granted to allow disposal of ash and fire debris from 2015 to 2017-18. The current municipal solid waste disposal rate, for wastes generated solely within Lake County, is approximately 45,000 tons per year (tpy), equivalent to 130 tpd. This excludes contributions from wildfire debris."

Page 10 states: "The peak daily disposal rate at the landfill is forecasted to be 480 tpd. The peak daily disposal rate will accommodate special events, seasonal

fluctuations due to construction or tourist activities, and other factors. This peak is based on historic waste deliveries for municipal solid waste only (year 2014), when waste import from Mendocino County was in effect and annual disposal rates were comparable to those forecasted at Eastlake Sanitary Landfill for year 2040 and beyond (for County-only wastes). This peak excludes debris disposal from wildfires, which has historically been allowed under waivers granted during a state of emergency.”

Page 13 states: “The County does not propose any significant changes in day-to-day operations as part of landfill expansion. In particular, no changes are proposed that would affect:

- Waste quantities received and daily customer counts, other than to accommodate planned growth in the Lake County service area. The peak daily traffic count is expected to remain within the 300 vehicle per day limit as currently allowed by Solid Waste Facility Permit #17-AA-0001.

It is not clear from the above excerpts whether or not there was any environmental analysis done for an increase in permitted maximum tonnage beyond the current parameters specified in the 1998 Solid Waste Facilities Permit.

- 2) It is not clear what the total disposal footprint and permitted facility boundary are planned to be based on the project description. Please clarify the proposed acreage of both the disposal footprint and permitted area.
- 3) What is the proposed total design capacity in cubic yards? The current permitted design capacity is 6,000,000 cubic yards. Is the 1,843,000 bank cubic yards in the project description in addition to the currently permitted amount? If yes, what will the total design capacity be in cubic yards? Please clarify.
- 4) The Joint Technical Document (JTD) (Appendix A of the MND) indicates a disposal acreage of 34.7. This acreage is inconsistent with the currently permitted disposal acreage of 31 acres and the estimated 35 acre disposal footprint as stated in the existing conditions section of the IS and does not account for the additional 21.8 acres analyzed by the MND.

An amended JTD will need to be submitted that is consistent with/does not exceed the CEQA analysis.

#### Solid Waste Regulatory Oversight

Implementation of the proposed project will require a revision of the Solid Waste Facilities Permit.

The Lake County, Department of Public Health, Local Enforcement Agency (LEA), is responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. The LEA contact is Christina Gearhart at (707) 263-1164 extension 249 or [Christina.Gearhart@lakecountyca.gov](mailto:Christina.Gearhart@lakecountyca.gov).

CalRecycle acting as a responsible agency, will be required to concur or deny the proposed permit based on the adequacy of the Mitigated Negative Declaration and all other applicable requirements of Titles 14 and 27 of the California Code of Regulations.

## **CONCLUSION**

It is the Lead Agency's responsibility to determine the type of environmental document appropriate for the project. However, CalRecycle offers the following guidance located on our website at:

<https://www.calrecycle.ca.gov/SWFacilities/Permitting/CEQA/Documents/Guidance/Disposal/>

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 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.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10-day 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 approval by the decision-making body.

If you have any questions regarding these comments, please contact me at (916) 341-6405 or [Christine.Karl@calrecycle.ca.gov](mailto:Christine.Karl@calrecycle.ca.gov).

Sincerely,



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Waste Permitting Compliance Mitigation Division  
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cc: Diane Vlach, Supervisor  
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