

**SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**

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FROM: Waste Management Department

SUBMITTAL DATE:
September 25, 2006

SUBJECT: Edom Hill Landfill Closure/Post-Closure Maintenance Project

RECOMMENDED MOTION:

1. Approval of the Edom Hill Landfill Closure/Post-Closure Maintenance Project in compliance with CEQA.
2. Adoption of a Mitigated Negative Declaration for Environmental Assessment No. 39216, based upon the findings in the Initial Study and the conclusion that the proposed project will not have a significant effect on the environment with the implementation of proposed mitigation measures incorporated into the project.
3. Adoption of the Mitigation Monitoring Program for Environmental Assessment No. 39216.
4. Adoption of a DeMinimis Impact Finding that the proposed project will not have a significant effect on biological resources.

BACKGROUND: The proposed project involves final closure and post-closure maintenance of the Edom Hill Landfill, which is located in the Coachella Valley area at 70-100 Edom Hill Road, Cathedral City, CA, north of the Interstate-10 Freeway off Varner Road. The landfill was a non-hazardous, municipal solid waste (MSW) disposal facility operated by Riverside County from 1967 until it reached capacity and was closed to waste delivery and disposal in December 2004. The landfill property is 435 acres in size, of which 420 acres are located within unincorporated Riverside County, east of the jurisdictional limits of City of Cathedral City, and the remaining 15 acres, encompassing a sedimentation basin, are located directly within City of Cathedral City boundaries. Approximately 8.4 acres of the landfill property are occupied by the Edom Hill Transfer Station, (Continued)

Hans W. Kernkamp, General Manager-Chief Engineer

Departmental Concurrence

FINANCIAL DATA	Current F.Y. Total Cost:	\$ 0	In Current Year Budget:	\$0
	Current F.Y. Net County Cost:	\$ 0	Budget Adjustment:	N/A
	Annual Net County Cost:	\$ 0	For Fiscal Year:	N/A

SOURCE OF FUNDS:	Positions To Be Deleted Per A-30	<input type="checkbox"/>
	Requires 4/5 Vote	<input type="checkbox"/>

C.E.O. RECOMMENDATION: **APPROVE**

County Executive Office Signature *Alex Gann*

Dept't Recomm.:
 Per Exec. Ofc.:
 Consent
 Policy

Prev. Agn. Ref.: | **District:** 4 | **Agenda Number:**

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which was built to replace the landfill when it closed. The landfill disposal footprint area, which represents the horizontal limit of trash, encompasses 148 acres of the landfill property. When the landfill ceased active operations in 2004, there were approximately 7,323,778 tons of trash in-place within the unlined disposal footprint. This trash is currently covered with a one-foot-thick intermediate cover, consisting of twelve (12) inches of compacted clean fill material, pending construction of the final landfill cover.

PROJECT DESCRIPTION: Pursuant to Title 27, CCR, Chapter 4, Section 21769(c), the Riverside County Waste Management Department (RCWMD) is required to carry out final closure and post-closure at the Edom Hill Landfill in accordance with a Final Closure/Post-Closure Maintenance Plan, as approved by California Integrated Waste Management Board (CIWMB), the Regional Water Quality Control Board (RWQCB), and the Riverside County Local Enforcement Agency (LEA). The Edom Hill Landfill Final Closure/Post-Closure Maintenance Plan describes those activities that will be taken by the RCWMD to remediate the effects of the disposed wastes in the landfill and ensure that there are adequate resources to guarantee the long term protection of public health and the environment.

Final Closure

The final closure of the Edom Hill Landfill primarily includes activities associated with constructing a final cover over the in-place waste tonnage within the landfill disposal footprint area and constructing associated drainage facilities. The main objective of the construction of the final cover is to inhibit infiltration by water and the formation of leachate, which may cause groundwater contamination, control erosion and abrasion of the landfill surface, and accommodate settlement and subsidence to maintain the integrity of the landfill surface cover.

Title 27 regulations require that the final cover meet minimum or prescriptive design and performance standards. However, these regulations also allow for an alternative to the prescriptive design standard, provided the alternative design standard equals or exceeds the performance of the prescriptive design. Based on analyses performed by Geo-Logic Associates, Inc., the RCWMD has selected an alternative, engineered final cover system, consisting of two (2) feet of admixed material (clay material [10% by weight] blended with on-site materials [90% by weight]) placed over at least one (1) foot of intermediate cover material, that should provide more environmental protection against water quality impairment, will be easier to maintain, and will be more economical than the prescriptive cover.

Construction of the final cover will require approximately 477,500 cubic yards of material, including a minimum of 70,000 cubic yards of clay material from an off-site source. The construction phase, also referred to as the "Demonstration Construction Project" ("DCP"), because the RCWMD will be required by the regulatory agencies to demonstrate the effectiveness of the proposed alternative cover system, is expected to start before the end of 2006 and last approximately 180 days.

Other construction activities include grading, constructing, and installing drainage structures that include drainage benches, engineered concrete and asphalt downdrains, and two (2) new sedimentation basins. To enhance the existing gas monitoring and control system, sixteen (16) multi-depth gas monitoring probes have been installed on the landfill property, with an additional probe proposed to be installed on adjacent property owned by the RCWMD prior to construction of the engineered final cover system.

Post-Closure Maintenance

Following construction of the final cover and completion of the "DCP," the post-closure maintenance period will be initiated. By regulation, post-closure maintenance is carried out for a minimum of 30 years

or longer until the appropriate regulatory authority determines the landfill no longer poses a threat to human health or the environment. The post-closure maintenance period for the Edom Hill Landfill will be no less than 35 years, with the first 5 additional years being required by the regulatory agencies to monitor the effectiveness of the proposed alternative cover system.

Monitoring during this 5-year period will be carried out in accordance with a "Cover Performance Monitoring Plan" ("CPMP"). While implementing the "CPMP," the RCWMD will specifically monitor for moisture infiltration into the landfill cover and for gas migration. To monitor for infiltration, 6 Moisture Probe Stations will be installed and monitored. Landfill gas migration will be monitored during the entire post-closure period through sampling of the 17 perimeter gas probes. If the engineered final cover system does not function properly during the first 5 years of post-closure while implementing the "CPMP," the RCWMD will implement a "Contingency Plan Construction Project" ("CPCP"). If excessive infiltration has occurred, an additional one-foot of admixed material will be placed within the limits of the landfill. If there is a chronic gas migration problem in the first 5 years, a gas extraction system will be installed for remediation.

The Edom Hill Landfill Post-Closure Maintenance Plan addresses inspection, monitoring, maintenance, and remediation of the following landfill components: 1) final cover; 2) drainage system; 3) vegetative cover; 4) final grading; 5) landfill environmental control systems, and 6) emergency response. Groundwater and landfill gas sampling, monitoring, and reporting will be conducted at a frequency established by the regulatory agencies. The RCWMD will conduct routine, periodic inspections and an annual inspection of the landfill systems to identify and perform needed repairs. A comprehensive inspection will occur immediately after any special events, such as major earthquakes, storms, fires, or other significant occurrences at the closed site. The post-closure maintenance crew will also respond to emergency repairs.

During and at the end of the 5-year "CPMP," the 148-acre disposal footprint area will be set aside as non-irrigated, open space in order to manage post-closure maintenance. In addition to the Edom Hill Transfer Station and sedimentation basins, the remaining acreage of the landfill property will be used for open space, ancillary uses, and/or other compatible uses. A projected future use includes a Wind Energy project.

The landfill is currently secured with a fence on portions of the landfill limits and property line around the lease area for the Edom Hill Transfer Station and around the equipment storage area. This fencing, in combination with natural terrain barriers, consisting of rocks, berms, and steep mountainous areas, generally prevents access to the landfill area in locations where there is no fence. While no additional fencing is planned during final closure construction, additional fencing or other site security measures may be installed or implemented during the post-closure period.

ENVIRONMENTAL ANALYSIS: Environmental Assessment (EA) No. 39216 was prepared by RCWMD to evaluate potential impacts associated with the project, in accordance with the California Environmental Quality Act (CEQA) Guidelines (Section 15000 et seq.) and the Rules for Riverside County Implementing CEQA. Based on the information contained in the EA, potential impacts may occur in the following areas: 1) Seismicity; 2) Water; 3) Transportation; 4) Air Quality; 5) Public Health and Safety; 6) Noise; 7) Public Services; and 8) Cultural/Paleontological Resources.

All identified potential impacts can be fully mitigated to a level of insignificance with implementation of the mitigation measures identified in the EA. A mitigation monitoring program (MMP), which is included herein for Board adoption, has been prepared to incorporate these mitigation measures. Likewise, a DeMinimis Impact Finding is also included for the Board to adopt, documenting findings that

the proposed project will not result in impacts to biological resources. Consequently, pursuant to CEQA Guidelines Section 15063, a Mitigated Negative Declaration has been prepared for Board adoption that documents the finding that the project will not result in any significant impacts.

In accordance with CEQA, a Notice of Intent to Adopt a Mitigated Negative Declaration and EA No. 39216 were posted at the State Clearinghouse and with the County Clerk and transmitted to responsible agencies and interested parties for comment for not less than 30 days (see attached Transmittal List). A public notice advertising the Notice of Intent and EA were published in The Desert Sun and The Press-Enterprise. All documents were also posted on the Department's internet website (www.rivcowm.org). Lastly, copies of the Mitigated Declaration and EA were made available to the public at the Riverside County Waste Management Department, the Western Riverside County Association of Governments, City of Riverside Main Library, Cathedral City Public Library, Desert Hot Springs Public Library, and Palm Desert Public Library

During the comment period of the EA, which officially began on August 23, 2006 and ended September 21, 2006, and as of the writing of this Form 11, the RCWMD received two (2) letters of comment from: (1) Riverside County Flood Control and Water Conservation District, and (2) Native American Heritage Commission. Although not required by CEQA, responses to comments have been prepared and attached for review by the Board of Supervisors in its consideration of approval of the project.

CONSISTENCY WITH GENERAL PLAN, ZONING AND OTHER APPLICABLE ENVIRONMENTAL PLANS OR POLICIES: According the Riverside County General Plan, the project site is designated as "PF" (Public Facilities) on the Western Coachella Valley Area Plan – Land Use Map. The Edom Hill Landfill, while in operation, offered essential solid waste services to the County and surrounding cities, which was consistent with the land use designation and the General Plan. The Edom Hill Transfer Station, which replaced the landfill when it closed and is located on the landfill property, continues to be consistent by offering these essential solid waste services to the County and its cities. The landfill is also located within the San Gorgonio Pass Wind Energy Policy Area, identified as one of the best areas in the nation for development of wind energy. The Plan explicitly allows the landfill property to be used for wind energy development. Wind energy facilities are projected to be operated at the landfill property, outside the landfill disposal footprint, after the final closure of the landfill. Lastly, any proposed use of adjoining lands located in Cathedral City by the RCWMD to carry out the closure project, including the 15-acre basin property, will not conflict with any applicable land use plan, policy, or ordinance of the City.

The proposed final landfill closure project is deemed a "public project" under the provisions of Section 18.2.a.b(1) of Riverside County Ordinance 348, which states in part that "no federal, state, county or city governmental project shall be subject to provisions of this ordinance." The proposed project is, therefore, not subject to County zoning requirements. It can be noted, however, that the landfill site is zoned W-2-20 (Controlled Development - 20 acre minimum lot size), which identifies "Disposal Service Operations" as being conditionally permitted within this zone. The project is not in conflict with the Riverside County Land Use Ordinance.

The closure and post-closure maintenance plan of the Edom Hill Landfill is consistent with the "Riverside County Siting Element" of the Riverside Countywide Integrated Waste Plan (CIWMP), which identifies closure of the landfill. In addition, one of the goals in the Siting Element identifies the need to "provide for economical disposal of non-hazardous solid waste." More specifically, the Siting Element recommends that the RCWMD "evaluate and implement cost effective and efficient adjustments to the waste management system..." It is cost efficient, system-wide, to close the Edom Hill Landfill, conserve

the landfill footprint as open space, and allow a transfer station to operate on the landfill property where users traditionally disposed of their trash.

Lastly, the Edom Hill Landfill property and the adjoining properties owned by the RCWMD are not located within any proposed area of conservation under the Draft Coachella Valley Association of Governments Multiple Species Habitat Conservation Plan (CVAG MSHCP). While the landfill is located within the fee area of the existing Coachella Valley Fringe-Toed Lizard Habitat Conservation Plan (CVFTL HCP), the Edom Hill Landfill is exempt from paying HCP mitigation fees as an existing use and as a governmental project. In addition, according to the Riverside County General Plan FTL Area Map, the site is located entirely outside the CVFTL habitat area. Finally, the nearest reserve to the project site is the Willow Hole Reserve, located about 1-2 miles west of the landfill property. Willow Hole has the potential to be impacted if intermittent streams carrying water and sand for fringe-toed lizards were to be altered. However, the closest blueline streams to the landfill are located outside and northeast of the property boundary. No activities associated with the final closure and post-closure will disturb these two streams.

COMMENT LETTERS: Two no-comment letters were received by the RCWMD, one from the Riverside County Flood Control and Water Conservation District, dated August 30, 2006; and the other from the Coachella Valley Water District, dated September 12, 2006. One comment letter from the Native American Heritage Commission (NAHC) dated August 29, 2006 was received by the RCWMD. The concerns mentioned by the NAHC have been addressed, as shown on the response issued by the RCWMD, which has been incorporated in this package.