



(Letter Sent Via Email)

November 6, 2019

Marika Poynter, Principal Planner
City of Irvine
Community Development Department
1 Civic Center Plaza
Irvine, CA 92606-5208

Subject: OC Waste & Recycling Responses to City of Irvine Comments on MND for Proposed Bee Canyon Greenery Composting Operation at FRB Landfill (SCH No. 2019099059)

Dear Ms. Poynter:

The County of Orange, OC Waste & Recycling department (OCWR) has the following responses to the City of Irvine's comment letter dated October 16, 2019 regarding the Mitigated Negative Declaration (MND) for the proposed Bee Canyon Greenery Composting Operation at the Frank R. Bowerman (FRB) Landfill.

Comment 1:

Page 7, 3rd paragraph under the Proposed Project – BCG: Please reword text in bold shown to clarify that Bee Canyon Greenery (BCG) will divert a maximum of 437 TPD using a 30-acre area. This section as currently written (excerpt below) indicates that BCG will divert up to 647 TPD (= 210 + 437) using a 47-acre area (= 17 + 30):

“The Bee Canyon Greenery will be developed in two phases on an approximate 30-acre area in the Phase V-D area of the FRB Landfill, as shown on Figure 2 (Site Layout). Phase 1 will accept up to 210 TPD on a 17-acre area as shown on Figure 3 (Phase 1 Operations Area) and Phase 2 will accept up to 437 TPD on a 30-acre area as shown on Figure 4 (Phase 2 Operations Area). Phase 2 will expand westerly of Phase 1, once the existing Quinn maintenance yard is relocated, and will accept up to 437 TPD.”

Suggested wording:

The Bee Canyon Greenery will be developed in two phases on an approximate 30-acre area in the Phase V-D area of the FRB Landfill, as shown on Figure 2 (Site Layout). Phase 1 will accept up to 210 TPD on a 17-acre area as shown on Figure 3 (Phase 1 Operations Area). **With the implementation of Phase 2, the BCG will accept up to 437 TPD total on a 30-acre area as shown on Figure 4 (Phases 1 and 2 Operations Area).** Phase 2 will expand westerly of Phase 1, once the existing Quinn maintenance yard is relocated, ~~and will accept up to 437 TPD.~~

Response 1:

The City of Irvine is correct in that this paragraph needs additional clarification. The MND will be changed to the following as shown in redline/strikeout text:

"The Bee Canyon Greenery will be developed in two phases on an approximate 30-acre area in the Phase V-D area of the FRB Landfill, as shown on Figure 2 (Site Layout). Phase 1 will accept up to 210 TPD on a 17-acre area as shown on Figure 3 (Phase 1 Operations Area). ~~Once the existing Quinn maintenance yard is relocated, the operation will expand westerly from 17-acres to a total of 30-acres, and allow for an increase in daily capacity from 210 TPD to a total of 437 TPD, as the Phase 1 operation becomes the Phase 2 operation. The Phase 2 operation is shown on Figure 4 (Phase 2 Operations Area). and Phase 2 will accept up to 437 TPD on a 30-acre area as shown on Figure 4 (Phase 2 Operations Area). Phase 2 will expand westerly of Phase 1, once the existing Quinn maintenance yard is relocated, and will accept up to 437 TPD.~~"

Comment 2:

Figure 4: Relabel from "Phase 2 Operations Area" to "Phases 1 and 2 Operations Area."

Response 2:

Per Response 1, once Phase 1 is expanded, it will become Phase 2 (i.e., Phases 1 and 2 will not exist at the same time). Therefore, the requested change to the title of Figure 4 is not required.

Comment 3:

Page 13, 2nd paragraph: Revise wording from "...until connecting with a series of ten water tanks with combined capacity of 130,000 gallons of reclaimed water. The size of the tanks will be 14.5 feet tall and 12 feet wide and will be positioned in two vertical rows of four tanks each (i.e., water tank farm). As shown on Figure 4."

To:

"...until connecting with a series of eight water tanks painted tan in color with a combined capacity of 100,000 gallons of reclaimed water. The size of the tanks will be 14 feet tall and 12 feet wide and will be positioned in two vertical rows of four tanks each (i.e., water tank farm). As shown on Figure 4."

The above revision will make the IS/MND language consistent with the information stated in your email correspondence dated September 30, 2019 (Attachment 1) indicating "With the height of the water tanks reduced from 18 to 14 feet, they are no longer visible from Portola Springs Community Park or from any other residential area in Portola Springs. The 12-foot high compost piles would also not be visible from any residential area in Portola Springs."

Additionally, Figure 4 depicts eight tanks with a capacity of 100,000 gallons as opposed to 10 tanks with a capacity of 130,000 gallons. Either revise the IS/MND wording and/or Figure 4 so

that the number and height of the tanks and their overall capacity are consistent throughout the document.

Response 3:

OCWR appreciates the City of Irvine's comment. Per ongoing conversations with the Orange County Fire Authority (OCFA), Figure 4 has now been revised (see attached) to include 10 water tanks with a combined capacity of 136,500 gallons. The tanks will all be 14 feet in height and 12 feet wide and will all be painted tan in color. The referenced paragraph will therefore be changed in the MND to the following as shown in redline/strikeout format:

"...until connecting with a series of ten water tanks ~~14 feet tall~~ **painted tan in color** with a combined capacity of ~~130,000~~ **136,500** gallons of reclaimed water. The size of the tanks will be ~~14.5~~ **14** feet tall and 12 feet wide and will be positioned in two vertical rows of ~~four~~ **five** tanks each (i.e., water tank farm), as shown on ~~the original~~ **the revised** Figure 4."

Comment 4:

Page 19 referring to Figure 7: Replace Figure 7, Viewshed Simulation Locations – Falcon Ridge (Site #1), in the public review draft IS/MND (dated 6/6/19) with the updated view simulation (dated 9/26/19) attached to your September 30, 2019 email correspondence.

Response 4:

The MND will be changed to include the revised Figure 7 (see attached). While this simulation was performed using a prior Figure 4 (Phase 2 Operations Plan) that included eight 14-foot high water tanks, which has now been replaced by ten 14-foot high water tanks, the viewshed simulation is still accurate as the water tanks would still not be visible, since any visual impacts from this location would be due to the height of the water tanks, which has not changed.

Comment 5:

Page 20, 1st paragraph: Based on your response to question 6 in our email correspondence dated September 12, 2019 (Attachment 2), replace Figure 8, Portola Springs Community Park View Simulation – Site #2 (dated 6/6/19) depicting the one 18-foot high water tank in the draft IS/MND with an updated view simulation demonstrating the water tank farm with the 8 smaller tanks (14 feet high by 12 feet wide each that are tan colored as opposed to white) will be out of view. Also revise the wording in the IS/MND to indicate that the new tanks will be 14-feet high (as opposed to 14.5-feet high) to make consistent.

Response 5:

The MND will be changed to include the revised Figure 8 (see attached). While this simulation was performed using a prior Figure 4 (Phase 2 Operations Plan) that included eight 14-foot high water tanks, which has now been replaced by ten 14-foot high water tanks, the viewshed

simulation is still accurate as the water tanks would still not be visible, since any visual impacts from this location would be due to the height of the water tanks, which has not changed.

Comment 6:

Page 58, last paragraph: The No Impact statement indicates: “The analysis included in Sections 2.1-2.20 above shows that the proposed Bee Canyon Greenery composting operation would not result in any substantial adverse effects on human beings, either directly or indirectly. No impacts will occur.”

Revise to:

“The analysis included in Sections 2.1-2.20 above shows that the proposed Bee Canyon Greenery composting operation would not result in any substantial adverse effects on human beings, either directly or indirectly. With the implementation of Mitigation Measure AS-1, no significant impacts will occur.”

Response 6:

The MND will be revised to incorporate this change.

Comment 7:

IS/MND Appendix A: As previously recommended, demonstrate compliance with SB 1383 by including the mailing list and radius map for the 4,566 owners/occupants that the NOI and October 10, 2019 public information meeting flier were distributed to.

Response 7:

OCWR will provide the City of Irvine with the requested information in a separate email.

Comment 8:

General Comment: The project is subject to review by the City and the OCFA for various construction document plan checks for the applicable fire life safety codes and regulations. The project will be subject to the current editions of the CBC, CFC, and related codes and the OCFA Guideline B09. In addition, standard OCFA conditions with regard to development, including water supply, built in fire protection systems, road grades and width, access, building materials, and the like will be applied to this project at the time of plan submittal.

Response 8:

OCWR acknowledges the City’s comment and will begin pursuing all required permits and entitlements for the proposed composting operation during the permitting phase of the project.

Please let me know if you would like to discuss any of the responses above. I can be reached at (714) 834-4107 or by email at john.arnau@ocwr.ocgov.com.

Sincerely,

A handwritten signature in black ink, appearing to read "John J. Arnau". The signature is fluid and cursive, with the first name "John" and last name "Arnau" clearly distinguishable.

John J. Arnau
CEQA Manager



October 16, 2019

Sent via USPS and
email: john.arnau@ocwr.ocgov.com

Mr. John Arnau
CEQA Manager, OC Waste & Recycling
601 N. Ross St., 5th Floor
Santa Ana, CA 92701

Subject: First Review of the Draft Initial Study and Mitigated Negative Declaration for Bee Canyon Greenery Composting Operation at the Frank R. Bowerman Landfill at 11002 Bee Canyon Access Road in Irvine

Dear Mr. Arnau:

City staff completed its review of the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Bee Canyon Greenery (BCG) Composting Operation at the Frank R. Bowerman (FRB) Landfill at 11002 Bee Canyon Access Road. The 725-acre FRB Landfill is located in unincorporated Orange County area, but within Irvine's sphere of influence in Planning Area 3.

The proposed project includes the following:

- Implement a green waste composting operation in two phases on an approximately 30-acre area within the FRB Landfill
- Divert a maximum of 437 tons per day (TPD) of processed green waste and agricultural material for composting
- At 437 TPD, and using 20-ton per load end dump trucks, the BCG will generate approximately 22 new two-way truck trips per day, with these trucks taking finished compost to end markets

Based on the review of the draft IS/MND, staff would like to provide the following comments:

1. Page 7, 3rd paragraph under the Proposed Project – BCG:
Please reword text in bold shown below to clarify that BCG will divert a maximum of 437 TPD total using a 30-acre area. This section as currently written (excerpt below), indicates that BCG will divert up to 647 TPD (= 210 + 437) using a 47-acre area (= 17 + 30):

"The Bee Canyon Greenery will be developed in two phases on an approximate 30-acre area in the Phase V-D area of the FRB Landfill, as shown on Figure 2 (Site Layout). Phase 1 will accept up to 210 TPD on a 17-acre area as shown on Figure 3 (Phase 1 Operations Area) and Phase 2 will accept up to 437 TPD on a 30-acre area as shown on Figure 4 (Phase 2 Operations Area). Phase 2 will expand westerly of Phase 1, once the existing Quinn maintenance yard is relocated, and will accept up to 437 TPD."

Suggested wording:

The Bee Canyon Greenery will be developed in two phases on an approximate 30-acre area in the Phase V-D area of the FRB Landfill, as shown on Figure 2 (Site Layout). Phase 1 will accept up to 210 TPD on a 17-acre area as shown on Figure 3 (Phase 1 Operations Area). **With the implementation of Phase 2, the BCG will accept up to 437 TPD total on a 30-acre area as shown on Figure 4 (Phases 1 and 2 Operations Area).** Phase 2 will expand westerly of Phase 1, once the existing Quinn maintenance yard is relocated, ~~and will accept up to 437 TPD.~~

2. Figure 4:
Relabel from "Phase 2 Operations Area" to "Phases 1 and 2 Operations Area."
3. Page 13, 2nd paragraph:
Revise wording from "...until connecting with a series of ten water tanks with a combined capacity of 130,000 gallons of reclaimed water. The size of the tanks will be 14.5 feet tall and 12 feet wide and will be positioned in two vertical rows of four tanks each (i.e., water tank farm). As shown on Figure 4."

To:

"...until connecting with a series of eight water tanks painted tan in color with a combined capacity of 100,000 gallons of reclaimed water. The size of the tanks will be 14 feet tall and 12 feet wide and will be positioned in two vertical rows of four tanks each (i.e., water tank farm). As shown on Figure 4."

The above revision will make the IS/MND language consistent with the information stated in your email correspondence dated September 30, 2019 (Attachment 1) indicating "With the height of the water tanks reduced from 18 to 14 feet, they are no longer visible from Portola Springs Community Park or from any other residential area in Portola Springs. The 12-foot high compost piles would also not be visible from any residential area in Portola Springs."

Additionally, Figure 4 depicts eight tanks with a capacity of 100,000 gallons as opposed to 10 tanks with a capacity of 130,000 gallons. Either revise the IS/MND wording and/or Figure 4 so that the number and height of the tanks and their overall capacity are consistent throughout the document.

4. Page 19 referring to Figure 7:

Replace Figure 7, Viewshed Simulation Locations – Falcon Ridge (Site #1), in the public review draft IS/MND (dated 6/6/19) with the updated view simulation (dated 9/26/19) attached to your September 30, 2019 email correspondence.

5. Page 20, 1st paragraph:

Based on your response to question 6 in our email correspondence dated September 12, 2019 (Attachment 2), replace Figure 8, Portola Springs Community Park View Simulation – Site #2 (dated 6/6/19) depicting the one 18-foot high water tank in the draft IS/MND with an updated view simulation demonstrating the water tank farm with the 8 smaller tanks (14 feet high by 12 feet wide each that are tan colored as opposed to white) will be out of view.

Also, revise the wording in the IS/MND to indicate that the new tanks will be 14-feet high (as opposed to 14.5-feet high) to make consistent.

6. Page 58, last paragraph:

The No Impact statement indicates:

"The analysis included in Sections 2.1-2.20 above shows that the proposed Bee Canyon Greenery composting operation would not result in any substantial adverse effects on human beings, either directly or indirectly. No impacts will occur."

Revise to:

"The analysis included in Sections 2.1-2.20 above shows that the proposed Bee Canyon Greenery composting operation would not result in any substantial adverse effects on human beings, either directly or indirectly. With the implementation of Mitigation Measure AS-1, no significant impacts will occur."

7. IS/MND Appendix A:

As previously recommended, demonstrate compliance with SB 1383 by including the mailing list and radius map for the 4,566 owners/occupants that the NOI and October 10, 2019 public information meeting flier were distributed to.

8. General Comment:

The project is subject to review by the City and the OCFA for various construction document plan checks for the applicable fire life safety codes and regulations. The project will be subject to the current editions of the CBC, CFC, and related codes and the OCFA Guideline B09

Mr. John Arneau
October 16, 2019
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In addition, standard OCFA conditions with regard to development, including water supply, built in fire protection systems, road grades and width, access, building materials, and the like will be applied to this project at the time of plan submittal.

Thank you for the opportunity to review and comment on the draft IS/MND for the proposed project. Staff would appreciate the opportunity to review any further information regarding this project as the planning/CEQA process proceeds.

If you have any questions, please contact Senior Planner Melissa Chao at 949-724-6395 or at mchao@cityofirvine.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Marika Poynter", written in a cursive style.

Marika Poynter
Principal Planner

Attachments:

1. September 30, 2019 email correspondence with revised view simulation attachment
2. September 12, 2019 email correspondence with all attachments

ec: Pete Carmichael, Director of Community Development
Tim Gehrich, Deputy Director of Community Development
Kerwin Lau, Manager of Planning Services
Melissa Chao, Senior Planner