



February 3, 2026

California High-Speed Rail Authority
Attn: Los Angeles to Anaheim Draft EIR/EIS Comment
355 S Grand Avenue, Suite 2050
Los Angeles, CA 90071

Subject: California Environmental Quality Act (CEQA) Comment Letter for the Draft Environmental Impact Report/ Environmental Impact Statement, titled California High-Speed Rail Project - Los Angeles to Anaheim Project Section (State Clearinghouse Number 2007031067)

The Department of Resources Recycling and Recovery (CalRecycle) would like to provide comments on the proposed Subject project and for your agency's consideration of these comments as part of the CEQA process.

PROJECT DESCRIPTION

The California High-Speed Rail Authority, acting as Lead Agency, has prepared and circulated a Draft Environmental Impact Report/ Environmental Impact Statement, 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 project titled, California High-Speed Rail Project - Los Angeles to Anaheim Project Section, will create approximately 30-miles of high-speed rail service within the Counties of Los Angeles and Orange. The project has indicated that several closed and active landfills are adjacent to the project footprint within the County of Los Angeles may be impacted.

COMMENTS

If closed or active landfills are affected by the project the following regulatory requirements may need to be addressed for each affected site:

Section 21190 - CIWMB-Postclosure Land Use

(a) Proposed postclosure land uses shall be designed and maintained to:

(1) protect public health and safety and prevent damage to structures, roads, utilities and gas monitoring and control systems;

(2) prevent public contact with waste, landfill gas and leachate; and

(3) prevent landfill gas explosions.

(b) The site design shall consider one or more proposed uses of the site toward which the operator will direct its efforts, or shall show development as open space, graded to harmonize with the setting and landscaped with native shrubbery or low maintenance ground cover.

(c) All proposed postclosure land uses, other than non-irrigated open space, on sites implementing closure or on closed sites shall be submitted to the EA, RWQCB, local air district and local land use agency. The EA shall review and approve proposed postclosure land uses if the project involves structures within 1,000 feet of the disposal area, structures on top of waste, modification of the low permeability layer, or irrigation over waste.

(d) Construction on the site shall maintain the integrity of the final cover, drainage and erosion control systems, and gas monitoring and control systems. The owner or operator shall demonstrate to the satisfaction of the EA that the activities will not pose a threat to public health and safety and the environment. Any proposed modification or replacement of the low permeability layer of the final cover shall begin upon approval by the EA, and the RWQCB.

(e) Construction of structural improvements on top of landfilled areas during the postclosure period shall meet the following conditions:

(1) automatic methane gas sensors, designed to trigger an audible alarm when methane concentrations are detected, shall be installed in all buildings;

(2) enclosed basement construction is prohibited;

(3) buildings shall be constructed to mitigate the effects of gas accumulation, which may include an active gas collection or passive vent systems;

(4) buildings and utilities shall be constructed to mitigate the effects of differential settlement. All utility connections shall be designed with flexible connections and utility collars;

(5) utilities shall not be installed in or below any low permeability layer of final cover;

(6) pilings shall not be installed in or through any bottom liner unless approved by the RWQCB;

(7) if pilings are installed in or through the low permeability layer of final cover, then the low permeability layer must be replaced or repaired; and

(8) periodic methane gas monitoring shall be conducted inside all buildings and underground utilities in accordance with § 20933 of Article 6, of Subchapter 4 of this Chapter.

(f) The EA may require that an additional soil layer or building pad be placed on the final cover prior to construction to protect the integrity and function of the various layers of final cover.

(g) All on-site construction within 1,000 feet of the boundary of any disposal area shall be designed and constructed in accordance with the following, or in accordance with an equivalent design which will prevent gas migration into the building, unless an exemption has been issued:

(1) a geomembrane or equivalent system with low permeability to landfill gas shall be installed between the concrete floor slab of the building and subgrade;

(2) a permeable layer of open graded material of clean aggregate with a minimum thickness of 12 inches shall be installed between the geomembrane and the subgrade or slab;

(3) a geotextile filter shall be utilized to prevent the introduction of fines into the permeable layer;

(4) perforated venting pipes shall be installed within the permeable layer, and shall be designed to operate without clogging;

(5) the venting pipe shall be constructed with the ability to be connected to an induced draft exhaust system;

(6) automatic methane gas sensors shall be installed within the permeable gas layer, and inside the building to trigger an audible alarm when methane gas concentrations are detected; and

(7) periodic methane gas monitoring shall be conducted inside all buildings and underground utilities in accordance with Article 6, of Subchapter 4 of this chapter (§ 20920 et seq.).

Gas Monitoring and Control Requirements

Sections 20921 through 20939 set forth the performance standards and the minimum substantive requirements for landfill gas monitoring and control systems for active solid waste disposal sites and for the proper closure, postclosure maintenance and ultimate reuse of solid waste disposal sites.

Closure and Postclosure Maintenance Standards

Sections 21090 through 21200 set forth the performance standards and minimum substantive requirements for proper closure, postclosure maintenance and ultimate reuse of disposal sites. Site specific conditions may be required to be described in the affected site's Closure Plan to ensure public health and safety and the environment are protected.

Solid Waste Regulatory Oversight

Solid Waste local enforcement agencies (LEA) are designated by the governing body of a county or city and, upon certification by CalRecycle, are empowered to implement delegated CalRecycle programs and locally designated activities. LEAs have the primary responsibility for ensuring the correct operation and closure of solid waste facilities in the state. They also have responsibilities for guaranteeing the proper storage and transportation of solid wastes.

As mentioned, LEAs must review and approve all postclosure land uses. It is encouraged that the project proponent and the Lead Agency reach out to the LEA to determine whether the project has the potential to impact active or closed solid waste disposal sites and to discuss applicable postclosure land use requirements for those sites affected. Contact information for each LEA can be found at CalRecycle's [LEA Directory Database](#).

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 Final EIR and 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 days 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 proposed project approval by the decision-making body.

If you have any questions regarding these comments, please contact Stephanie Young at 916.323.1100 or by e-mail at Stephanie.Young@CalRecycle.ca.gov for any discussions about a closed, illegal, or abandoned disposal sites, and please contact Ben Escotto at 916.341.6138 or by e-mail at Benjamin.Escotto@calrecycle.ca.gov for any discussions about active disposal sites.

Sincerely,



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