

**LOS ANGELES COUNTY
COUNTYWIDE INTEGRATED
WASTE MANAGEMENT
SUMMARY PLAN**



**NEGATIVE
DECLARATION**

SCH NO. 96031033

Los Angeles
County
Department of
Public Works
Environmental
Programs Division
June 1997

Mail to: State Clearinghouse, 1400 Centre Street, Room 121, Sacramento, CA 95814 (916) 445-6613

NOTICE OF COMPLETION AND ENVIRONMENTAL DOCUMENT TRANSMITTAL FORM

See NOTE below

SCH#

1. Project Title: Summary Plan of the Countywide Integrated Waste Management Plan
2. Lead Agency: Los Angeles County Department of Public Works. Contact Person: David M. Smith
3a. Street/Address: 900 South Kingsbury Avenue 3b. City: Alhambra
3c. County: Los Angeles 3d. Zip: 91801 3e. Phone: (818) 428-1261

PROJECT LOCATION 4. County: Los Angeles 4a. City/Community: All cities in Los Angeles County

4b. Assessor's Parcel No.: N/A 4c. Section: Twp. Range

5a. Cross Streets: N/A 5b. Community:

6. Within 2 miles: a. Hwy # b. ports c. ways d. ways

7. DOCUMENT TYPE 8. LOCAL ACTION TYPE 9. DEVELOPMENT TYPE

- 01. X MAP 06. NRE 01. General Plan Update 01. Residential: Units Acres
02. Early Cons 07. NOD 02. New Element 02. Office: Sq. Ft.
03. X Neg Dec 08. NOD 03. General Plan Amendment 03. Area Employees
04. Draft EIR 05. Master Plan 04. Shopping/Commercial: Sq. Ft.
05. Supplemental/ Subsequent EIR (Prior SCH No.): 06. Specific Plan 04. Industrial: Sq. Ft. Acres Employee
07. Community Plan 05. Water Facilities: MGD
08. Redevelopment 06. Transportation: Type
09. Rezone 07. Mining: Mineral
10. Land Division (Subdivision, Parcel Map, Tract Map, etc.) 08. Power: Type Watts
11. Use Permit 09. Waste Treatment: Type
12. X Waste Mgmt Plan 10. OCS Related
13. Cancel Ag Preserve 11. Other:
14. Other:

10. TOTAL ACRES: 11. TOTAL JOBS CREATED:

12. PROJECT ISSUES DISCUSSED IN DOCUMENT

- 01. Aesthetic/Visual 08. Flooding/Drainage 15. Septic Systems 23. Water Quality
02. Agricultural Land 09. Geological/Seismic 16. Sewer Capacity 24. Water Supply
03. Air Quality 10. Jobs/Housing Balance 17. Social 25. Wetland/Riparian
04. Archaeological/Historical 11. Minerals 18. Soil Erosion 26. Wildlife
05. Coastal Zone 12. Noise 19. Solid Waste 27. Growth Inducing
06. Economic 13. Public Services 20. Toxic/Hazardous 28. Incompatible Land use
07. Fire Hazard 14. Schools 21. Traffic/Circulation 29. Cumulative Effects
22. Vegetation 30. Other:

13. FUNDING (approx) Federal \$ State \$ Total \$

14. PRESENT LAND USE AND ZONING: N/A

15. PROJECT DESCRIPTION: The project is a Summary Plan consisting of an overview of all the Elements of the countywide solid waste management planning process which includes the Source Reduction and Recycling Elements, Household Hazardous Waste Elements, and Non-disposal Facility Elements of the 88 cities in Los Angeles County and the County unincorporated areas. The Summary Plan includes countywide goals, policies, and objectives for coordinating countywide diversion programs, marketing, and disposal strategies. Also, the Summary Plan will include proposed programs which the cities in Los Angeles County and the County have selected for implementation in order to achieve the above goals.

State Clearinghouse Contact: Mr. Chris Belsky (916) 445-0613

Project Sent to the following State Agencies

State Review Began: 3.13.96
Dept. Review to Agency: 4.5
Agency Rev to SCH: 4.10
X SCH COMPLIANCE: 4.12 6-17

- X Resources
Boating
Coastal Comm
Coastal Consv
Colorado Rvr Bd
Conservation
X Fish & Game # 5
Delta Protection
Forestry
Parks & Rec/OHP
Reclamation
BCDC
X DWR
OES
Bus Transp Hous
Aeronautics
CHP
X Caltrans # 7
Trans Planning
Housing & Devel
Health & Welfare
X Drinking H2O
Medical Waste
State/Consumer Svcs
General Services
Cal/EPA
X ARB
X CA Waste Mgmt Bd
SWRCB: Grants
SWRCB: Delta
SWRCB: Wtr Quality
SWRCB: Wtr Rights
X Reg. WQCB # 4
DTSC/CTC
Yth/Adlt Corrections
Corrections
Independent Comm
Energy Comm
X NAHC
PUC
Santa Mn Mtns
X State Lands Comm
Tahoe Rgl Plan
Other:

Please note SCH Number on all Comments
96031033

Please forward late comments directly to the Lead Agency

AQMD APCD 33 (Resources: 3.16)

* extended review

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PART I
NEGATIVE DECLARATION

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NEGATIVE DECLARATION
FOR
SUMMARY PLAN
OF THE LOS ANGELES COUNTY
COUNTYWIDE INTEGRATED WASTE MANAGEMENT PLAN

I. Project Location

All of Los Angeles County - All 88 cities located in Los Angeles County and the County Unincorporated Areas

II. Project Description

The project is a Summary Plan consisting of an aggregate of all the Elements of the countywide solid waste management planning process which includes the Source Reduction and Recycling Elements, Household Hazardous Waste Elements, and Nondisposal Facility Elements of the 88 cities in Los Angeles County and the County unincorporated areas. The Summary Plan includes Countywide goals, policies, and objectives for coordinating Countywide diversion programs, marketing strategies, and disposal strategies. Also, the Summary Plan will include proposed programs which the cities in Los Angeles County and the County select for implementation on a countywide basis in order to achieve the above goals (California Code of Regulations, Title 14, Division 7, Chapter 9, Article 6.6, Sections 18757 through 18758).

III. Mitigation Measures Included in the Project to Avoid Potentially Significant Effects

Analysis of some environmental effects of the project using the initial Environmental Checklist Form identified some areas where the project may have minor effects; however, no environmental effects were determined. The impacts identified in the Environmental Checklist Form and measures to avoid less than significant effect are discussed in Section IV of the Initial Study of Environmental Factors. This evaluation is limited to those potential impacts marked "Less Than Significant Impacts".

IV. Finding of No Significant Effect

Based on the findings of the attached Initial Study of Environmental Factors, it has been determined that the proposed project will not have a significant effect on the environment.

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INITIAL STUDY AND ENVIRONMENTAL ASSESSMENT

SUMMARY PLAN
OF THE LOS ANGELES COUNTY
COUNTYWIDE INTEGRATED WASTE MANAGEMENT PLAN

Los Angeles County
Department of Public Works
Environmental Programs Division

January 1996

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INITIAL STUDY OF ENVIRONMENTAL FACTORS

**Project Title: Countywide Integrated Waste Management Summary Plan
for the County of Los Angeles (Summary Plan)**

This Initial Study was prepared by the Los Angeles County Department of Public Works pursuant to the California Environmental Quality Act of 1970, as amended (Division 13, California Public Resources Code), and the State's California Environmental Quality Act Guidelines (Title 14, Division 6, California Code of Regulations).

I. Location and Description of Project

A. Location: All of Los Angeles County - All 88 cities located in Los Angeles County (Table 1.0) and the County unincorporated areas. Figure 1 is a map showing Los Angeles County.

B. Purpose

The purpose of this project is to aggregate all the Elements of the countywide solid waste management planning process including a summary of significant waste management problems facing the County. The Summary Plan will also contain countywide goals, policies, and objectives for coordinating countywide diversion programs, marketing strategies, and disposal strategies developed with the assistance of the Los Angeles County Integrated Waste Management Task Force (Task Force). The Summary Plan will provide an overview of the specific steps that will be taken by local agencies, acting independently and in concert, to achieve the purposes of the California Integrated Waste Management Act of 1989, as amended (California Public Resources Code, Section 41751).

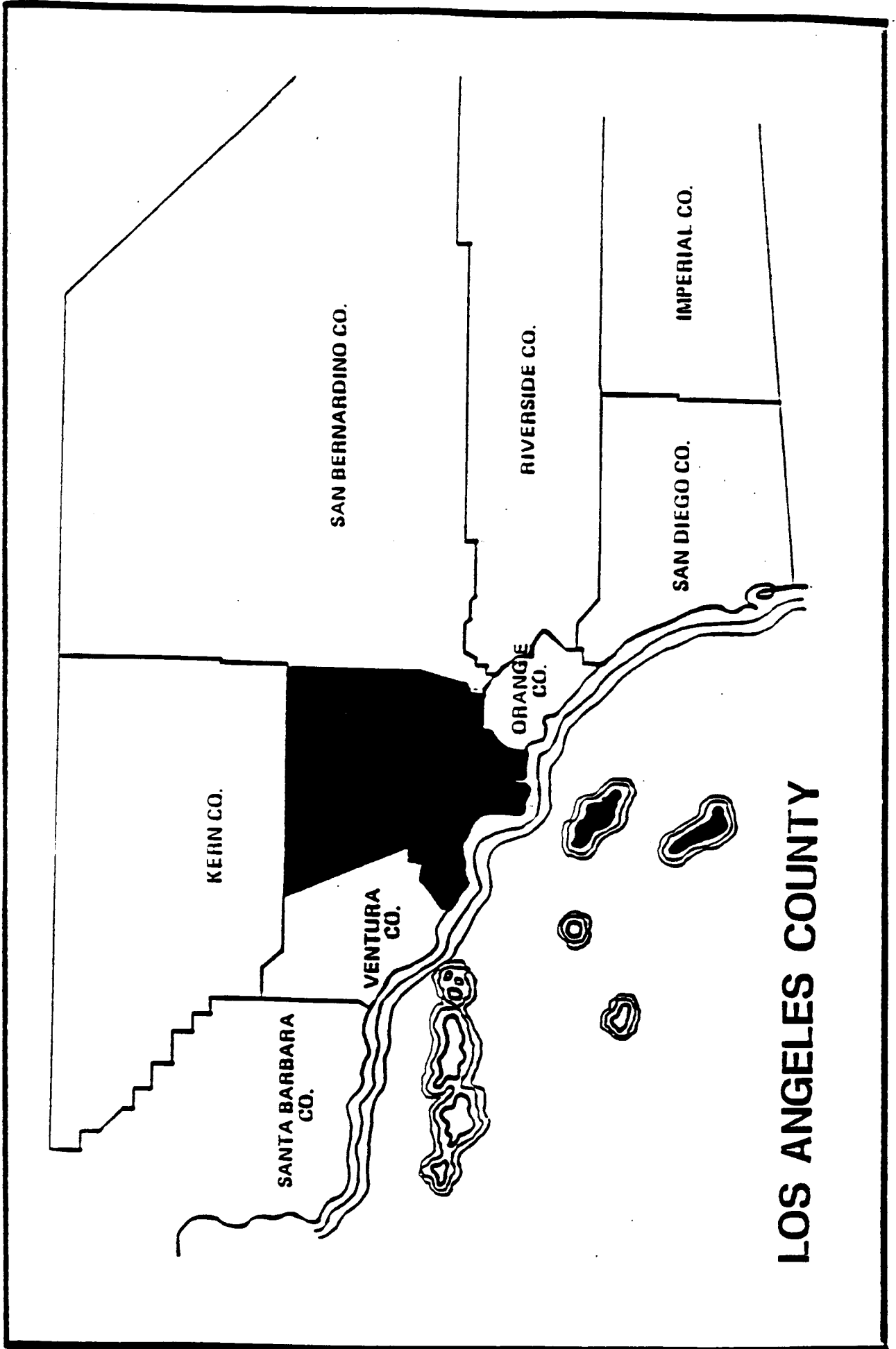
C. Description of work

The project consists of preparing the Countywide Integrated Waste Management Summary Plan for the County of Los Angeles pursuant to the statutory requirements for the content and format of a Countywide Summary Plan found in the California Public Resources Code, Section 41751. These requirements are further clarified in regulations adopted by the California Integrated Waste Management Board, and approved by the Office of Administrative Law, for the preparation of a Countywide Integrated Waste Management Summary Plan (California Code of Regulations, Title 14, Division 7, Chapter 9, Article 6.6 Sections 18757 through 18758).

TABLE 1.0

List of Cities Located in Los Angeles County

Agoura Hills	Hermosa Beach	Redondo Beach
Alhambra	Hidden Hills	Rolling Hills
Arcadia	Huntington Park	Rolling Hills Estates
Artesia	Industry	Rosemead
Avalon	Inglewood	San Dimas
Azusa	Irwindale	San Fernando
Baldwin Park	La Canada Flintridge	San Gabriel
Bell	La Habra Heights	San Marino
Bellflower	Lakewood	Santa Clarita
Bell Gardens	La Mirada	Santa Fe Springs
Beverly Hills	Lancaster	Santa Monica
Bradbury	La Puente	Sierra Madre
Burbank	La Verne	Signal Hill
Calabasas	Lawndale	South El Monte
Carson	Lomita	South Gate
Cerritos	Long Beach	South Pasadena
Claremont	Los Angeles	Temple City
Commerce	Lynwood	Torrance
Compton	Malibu	Vernon
Covina	Manhattan Beach	Walnut
Cudahy	Maywood	West Covina
Culver City	Monrovia	West Hollywood
Diamond Bar	Montebello	Westlake Village
Downey	Monterey Park	Whittier
Duarte	Norwalk	
El Monte	Palmdale	
El Segundo	Palos Verdes Estates	
Gardena	Paramount	
Glendale	Pasadena	
Glendora	Pico Rivera	
Hawaiian Gardens	Pomona	
Hawthorne	Rancho Palos Verdes	



LOS ANGELES COUNTY

Location Map of Los Angeles County

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As mandated by State law, the Countywide Summary Plan must include, but is not limited to, the following:

1. A description of the goals, policies, and objectives developed with the assistance of the Task Force to guide the County in coordinating countywide diversion programs, marketing strategies, and disposal strategies for the medium term planning period (1996-2000).
2. A general description of Los Angeles County's geography and a summary of important demographic data. Also, a description of the governmental solid waste management infrastructure and identification of the entities responsible for administering and implementing the Countywide Summary Plan.
3. A description of current solid waste management practices in all 88 cities of Los Angeles County and the County unincorporated areas. These practices include refuse collection, transfer, and disposal practices. An identification of all permitted solid waste facilities and diversion facilities (excepted from a Solid Waste Facility Permit) located within the County. A description of diversion programs already in place, and a summary of countywide or regional market development efforts.
4. A summary of the types of diversion programs, contingency programs and measures, targeted materials marketing strategies selected in each jurisdiction's Source Reduction and Recycling Element (SRRE) and Household Hazardous Waste Element (HHWE), and a list of the types and numbers of Nondisposal Facilities and the jurisdictions they serve. It shall also include an identification of those programs in the SRREs and the HHWEs that could be coordinated on a countywide basis.
5. Estimated costs and a summary of funding and revenue sources for the programs and facilities to be implemented/developed on a countywide basis.

In addition to the required content of the Summary Plan, the Summary Plan may include a description of any additional countywide programs which the cities in Los Angeles County and the County determine to be necessary to achieve AB 939 mandates.

The Summary Plan will address the above items with the intent of providing a means for improved coordination of diversion programs, marketing strategies, and disposal strategies on a Countywide basis to effectively serve the public need. Table 2.0 is a summary of Proposed Programs for Countywide Coordination. These programs are based on the goals, policies, and objectives developed with the assistance of the Task Force.

Table 2.0

POTENTIAL PROGRAMS FOR COUNTYWIDE COORDINATION

- 1) Assistance With Public Promotion/Education
 - Information for General Distribution
 - Coordination of Local Promotional Campaigns
 - Multi-language Assistance
 - Enhanced Expanded School Education
 - Mobile Waste Reduction Museum
 - Countywide Speakers Bureau
 - Recognition Program for Business

- 2) Information Sharing
 - Online Computer Network Service
 - Solid Waste Personnel and Programs Directory

- 3) City Outreach
 - Regional Solid Waste Meeting Enhancements

- 4) Large Generator Waste Reduction Programs
 - Corporate Accounts
 - Grasscycling/Xeriscaping

- 5) Standards and Ordinances
 - Point-of-Purchase Education Policy

- 6) Gaps in Service
 - Backyard Composting
 - Christmas Tree Drop-off Program
 - Used Motor Oil
 - Latex Paint
 - Oil-based Paint
 - Household Batteries
 - Waste Tire Haulers

- 7) Procurement
 - Procurement Cooperatives

II. Phasing and Relationship to other Projects

The Summary Plan is a component of the Countywide Integrated Waste Management Plan.

The California Integrated Waste Management Act directs counties to prepare a Countywide Integrated Waste Management Plan (Plan). This Plan will consist of the Source Reduction and Recycling Elements, Household Hazardous Waste Elements, and Nondisposal Facility Elements of all jurisdiction within the County; the Countywide Siting Element; and the Summary Plan of the Los Angeles County Countywide Integrated Waste Management Plan.

III. Identification of Environmental Effects

The identification of Environmental effects are shown in the enclosed Environmental Checklist Form as follows:

ENVIRONMENTAL CHECKLIST FORM

1. Project Title: Los Angeles County Countywide Integrated Waste Management Summary Plan
2. Lead Agency Name and Address: Los Angeles County Department of Public Works
900 South Fremont Avenue, Alhambra CA 91803
3. Contact Person and Phone Number: David M. Smith (818) 458-3561
4. Project Location: All of Los Angeles County, including all cities in the County
5. Project Sponsor's Name and Address: Los Angeles County Department of Public Works
900 South Fremont Avenue, Alhambra CA 91803
6. General Plan Designation: N/A
7. Zoning: N/A
8. Description of Project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support or off-site features necessary for its implementation. Attach additional sheets if necessary)

See attachment

9. Surrounding Land Uses and Setting: Briefly describe the project's surroundings)

Not applicable

10. Other public agencies whose approval is required
(e.g., permits, financing approval, or participation agreement.)

The documents described herein must be reviewed and acted upon by every city in the County and the County Board of Supervisors. Approval is required from a majority of the Cities containing a majority of the incorporated population, the County Board of Supervisors, and the California Integrated Waste Management Board.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|---|--|
| <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Transportation/Circulation | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Geological Problems | <input type="checkbox"/> Energy and Mineral Resources | <input type="checkbox"/> Aesthetics |
| <input type="checkbox"/> Water | <input type="checkbox"/> Hazards | <input type="checkbox"/> Cultural Resources |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Noise | <input type="checkbox"/> Recreation |
| | <input type="checkbox"/> Mandatory Findings of Significance | |

DETERMINATION.

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☒

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A NEGATIVE DECLARATION will be prepared. ☐

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☐

I find that the proposed project MAY have a significant effect(s) on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project. ☐

Signature
 David M. Smith
 Printed Name

Date
 Los Angeles County
 For
 Department Of Public Works

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I. LAND USE AND PLANNING. Would the proposal:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with general plan designation or zoning? (source #(s):) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project? () | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Be incompatible with existing land use in the vicinity? () | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Affect agricultural resources or operations (e.g., impacts to soils or farmlands, or impacts from incompatible land uses)? () | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)? () | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

II. POPULATION AND HOUSING. Would the proposal:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cumulatively exceed official regional or local population projections? () | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)? () | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Displace existing housing, especially affordable housing? () | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
III. GEOLOGIC PROBLEMS. Would the proposal result in or expose people to potential impacts involving				
a) Fault rupture? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Seismic ground shaking ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Seismic ground failure, including liquefaction? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Seiche, tsunami, or volcanic hazard? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Landslides or mudflows? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Erosion, changes in topography or unstable soil conditions from excavation, grading, or fill? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Subsidence of the land? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expansive soils? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Unique geologic or physical features? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IV. WATER. Would the proposal result in:				
a) Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of people or property to water related hazards such as flooding? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Discharge into surface waters or other alteration of surface water quality (e.g. temperature, dissolved oxygen or turbidity)? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Changes in the amount of surface water in any water body? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Changes in currents, or the course or direction of water movements? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations or through substantial loss of groundwater recharge capability? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Altered direction or rate of flow of groundwater? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Impacts to groundwater quality? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Substantial reduction in the amount of groundwater otherwise available for public water supplies? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
V. AIR QUALITY. Would the proposal:				
a) Violate any air quality standard or contribute to an existing or projected air quality violation? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Expose sensitive receptors to pollutants? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Alter air movement, moisture, or temperature, or cause any change in climate? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create objectionable odors? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VI. TRANSPORTATION/CIRCULATION. <input type="checkbox"/>				
Would the proposal result in:				
a) Increased vehicle trips or traffic congestion? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Hazards to safety from design features (e.g., sharp curves or dangerous interseuons) or incompatible uses (e.g., farm equipment)? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Inadequate emergency access or access to nearby uses? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Insufficient parking capacity on-site or off-site? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Hazards or barriers for pedestrians or bicyclists? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflicts with adopted policies supporting transportation (e.g. bus turnouts, bicycle racks)? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Rail, waterborne or air traffic impacts? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VII. BIOLOGICAL RESOURCES.				
Would the proposal result in impacts to:				
a) Endangered, threatened or rare species or their habitats (including but not limited to plants, fish, insects, animals, and birds)? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Locally designated species (e.g. heritage trees)? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Locally designated natural communities (e.g. oak forest, coastal habitat, etc.)? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Wetland habitat (e.g. marsh, riparian and vernal pool)? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Wildlife dispersal or migration corridors? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issues	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. ENERGY AND MINERAL RESOURCES.				
Would the proposal:				
a) Conflict with adopted energy conservation plans? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Use non-renewable resources in a wasteful and inefficient manner? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IX. HAZARDS. Would the proposal involve:				
a) A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals or radiation)? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Possible interference with an emergency response plan or emergency evacuation plan? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) The creation of any health hazard or potential health hazard? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Exposure of people to existing sources of potential health hazards? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Increased fire hazard in areas with flammable brush, grass, or trees? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X. NOISE. Would the proposal result in:				
a) Increases in existing noise levels? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of people to severe noise levels? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XI. PUBLIC SERVICES. Would the proposal have an effect upon, or result in a need for new or altered government services in any of the following areas:				
a) Fire protection? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Maintenance of public facilities, including roads? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other governmental services? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. UTILITIES AND SERVICE SYSTEMS. Would the proposal result in a need for new systems or supplies, or substantial alterations to the following utilities:				
a) Power or natural gas? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Communications systems? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Local or regional water treatment or distribution facilities? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Sewer or septic tanks? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Storm water drainage? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Solid waste disposal? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Local or regional water supplies? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIII. AESTHETICS. Would the proposal:				
a) Affect a scenic vista or scenic highway? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a demonstrable negative aesthetic effect? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Create light or glare? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIV. CULTURAL RESOURCES. Would the proposal:				
a) Disturb paleontological resources? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Disturb archaeological resources? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Affect historical resources? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have the potential to cause a physical change which would affect unique ethnic cultural values? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Restrict existing religious or sacred uses within the potential impact area? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XV. RECREATION. Would the proposal:				
a) Increases the demand for neighborhood or regional parks or other recreational facilities? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Affect existing recreational opportunities? ()	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IV. Discussion of Environmental Factors and Mitigation of Environmental Effects

Analysis of some environmental effects of the project using the initial Environmental Checklist Form identified some areas where the project may have less than significant effects; however, no potentially significant environmental effects were determined. The impacts identified in the Environmental Checklist Form and measures to avoid less than significant effect are discussed below in their order of appearance in that checklist.

V. Air Quality, item a

- a. The programs identified in Table 2, Proposed Countywide Programs have the potential to generate additional traffic on streets and contribute to increased air emissions.

These programs would involve travel to designated locations for meetings, workshops, and to deliver Christmas trees and household hazardous waste. The locations of the event, drop-off site, or facility would determine the amount of air emissions generated. However, some of these programs are seasonal, some are conducted only on weekends during non-peak hours of traffic, and most are existing programs which are to be continued. Therefore, the impacts associated with potential additional air emissions are considered less than significant.

Possible mitigation measures include propane- or methanol-fueled vehicles, and natural gas- or electric-powered equipment and vehicles. Use of alternative vehicle fuel sources may need to be assessed prior to implementation of programs.

VI. Transportation, item a

- a. The programs identified in Table 2, Proposed Countywide Programs have the potential to generate additional traffic on streets.

These programs would involve travel to designated locations for meetings, workshops, and to deliver Christmas trees and household hazardous waste. The locations of the events, drop-off sites, or facility would determine the amount of additional traffic generated. However, some of these programs are seasonal, some are conducted only on weekends during non-peak hours of traffic, and most are existing programs which are to be continued. Therefore, the impacts associated with potential additional traffic are considered less than

significant and would not have any significant increase in the existing traffic patterns.

Mitigation measures designed to minimize this impact should include site-specific impacts, if any, and related mitigation measures, if required, will be identified at such time as each program is designed and implemented.

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PART II

- APPENDIX ND-A - TOPICAL COMMENT AND RESPONSE**
- APPENDIX ND-B - PUBLIC MEETING COMMENTS AND RESPONSES**
- APPENDIX ND-C - COMMENT LETTERS RECEIVED AND SPECIFIC RESPONSES**
- APPENDIX ND-D - LETTER DATED MARCH 4, 1996 TO THE STATE CLEARINGHOUSE**

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APPENDIX ND-A

TOPICAL COMMENT AND RESPONSE

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Appendix ND-A
Topical Comment and Response

Purpose of the Negative Declaration

Comments have been received asserting that the Negative Declaration is not the proper environmental document for the Preliminary Draft Summary Plan when the Summary Plan contains the Countywide Siting Element (CSE) which has an Environmental Impact Report acknowledging irreversible environmental impacts. The commentors further state that neither the Draft Environmental Impact Report nor the Negative Declaration adequately address the impacts on the environment (land, air, water, traffic) and human health by the use of the proposed landfills.

The CSE and the Summary Plan are two independent documents each of which are part of the Countywide Integrated Waste Management Plan. Therefore, the CSE is not part of the Summary Plan. The Summary Plan describes and summarizes the steps that will be taken by cities and the County, acting on their own or with others, to achieve the State-mandated waste diversion goals by means of reducing, reusing, recycling and diverting waste that is generated. The CSE describes how jurisdictions in Los Angeles County plan to address the need for 15 years of disposal capacity for the residual waste which cannot be reduced, reused, recycled or diverted.

The Negative Declaration, which includes the Environmental Checklist Form, pertains only to the preparation of the Summary Plan document of the Los Angeles County Countywide Integrated Waste Management Plan. It does not pertain to the programs discussed within the Summary Plan. The Negative Declaration is not intended to address the CSE or any issue pertaining to the siting of any disposal facilities.

Please refer to the Final Draft CSE for responses to comments regarding the Draft EIR.

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APPENDIX ND-B

PUBLIC MEETING COMMENTS AND RESPONSES

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Appendix ND-B
Public Meeting Comments and Responses

Date	Speaker	Summary of Comment/Question	Response
4/2/96	Zona Myers Citizen	Questions whether a simple majority of the 88 cities is required to pass the proposed Negative Declaration, Initial Study, and Environmental Assessment.	State Law requires that these documents be adopted by the County and by a majority of the cities within the County that contain a majority of the incorporated population.
4/4/96	Lynne Plambeck Chair of L.A.S.E.R.	The Negative Declaration is not the proper environmental document for the Countywide Integrated Waste Management Plan which includes the Countywide Siting Element.	Refer to Topical Response in Appendix ND-A.

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APPENDIX ND-C

COMMENT LETTERS RECEIVED AND SPECIFIC RESPONSES

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This Appendix contains copies of letters received by the Department commenting on the Preliminary Draft of the Negative Declaration. Responses have been provided to the right of specific comments in each letter. Several of the letters also contain comments regarding the Preliminary Draft Summary Plan, the Preliminary Draft Countywide Siting Element, and the Preliminary Draft Environmental Impact Report. Responses to these comments may be found in the appropriate appendices in the Final Drafts of those documents.

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Appendix ND-C
Comment Letters Received and Specific Responses

Page	City/Agency/ Organization	Author	Title	Letter Date
Comments Received from Cities				
ND-C-1	South El Monte	Steven A. Henley	Assistant City Manager	4/8/96
ND-C-2	Commerce	Richard King	Environmental Services Coordinator	5/15/96
ND-C-5	Monterey Park	Chris Jeffers	City Manager	6/14/96
ND-C-9	Vernon	Lewis J. Pozebon	Director of Environmental Health Dept.	6/17/96
ND-C-13	La Puente	Steve Hauerwaas	Management Asst./Solid Waste Coordinator	9/12/96
Comments Received from Government Agencies				
ND-C-14	Kern County Waste Mgmt Dept.	Susan L. Reid	RMDZ Coordinator	3/26/96
ND-C-15	Governor's Office of Planning and Research	Antero A. Rivasplata	Chief, State Clearinghouse	4/12/96
ND-C-17	*So. Ca. Assoc. of Governments	Viviane Doche-Boulos	Intergovernmental Review	4/30/96
ND-C-24	Metropolitan Water District of Southern California	*Laura J. Simonek	Principal Environmental Specialist	6/13/96
ND-C-30	Governor's Office of Planning and Research	Antero A. Rivasplata	Chief, State Clearinghouse	6/17/96
Comments Received from the Public				
ND-C-34	Resident	Peggy McCain	Resident	4/28/96
ND-C-35	Olive View Neighborhood Watch	Charles O'Connell, P.E.	Planning and Land Use Committee	5/8/96
ND-C-37	LASER	Lynne Plambeck	Private Citizen	6/17/96
ND-C-47	Upper Mandeville Canyon Assoc.	Betsey Landis	Vice-President	6/17/96
ND-C-50	Sierra Club	Andres Cano	Solid Waste Consultant	6/17/96

* Attachments to the comment letter are not included in this Appendix but are on file with the Los Angeles County Department of Public Works.

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CITY OF SOUTH EL MONTE
 1415 N. SANTA ANITA AVENUE
 SOUTH EL MONTE, CALIFORNIA 91733
 (818) 579-6640 • (213) 686-0460 • FAX (818) 576-2107

April 8, 1996

Los Angeles County Department of Public Works
 Environmental Programs Division
 P.O. Box 1460
 Alhambra, CA 91802-1460

RECEIVED

APR 09 1996

DEPARTMENT OF PUBLIC WORKS
 ENVIRONMENTAL PROGRAMS DIVISION

Re: Countywide Siting/EIS/CEQA/ES&S


Gentlemen:

Please be advised that at their regular meeting of March 26, 1996 the City Council of the City of South El Monte, by a minute action vote of 4-eyes and one (1) abstention, approved the following documents as submitted by your offices:

1. The Preliminary Draft of the Los Angeles County Countywide Siting Element (Siting Plan) dated January, 1996.
2. The Draft Summary Plan of the Countywide Integrated Waste Management Plan (Summary Plan), dated January, 1996; Volume I, the Plan, and Volume II, Appendices.
3. The Draft Environmental Impact Report (DEIR) for the Siting Element, dated January, 1996 (SCH No. 95011048).
4. The proposed Negative Declaration for the Summary Plan, dated January, 1996.

Should you have any questions related to this matter, please feel free to contact the undersigned.

Respectfully,


 Steve A. Henley
 Assistant City Manager/
 Director of Public Works



CITY OF COMMERCE

Robert J. Cornejo, Mayor
Jesus M. Cerecutes, Councilmember
Arturo E. Navarro, Councilmember
Rafael T. Romero, City Administrator
Eglea Muñoz, Mayor Pro Tem

May 15, 1966

RECEIVED

MAY 20 1966

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Harry W. Stone, Deputy Director
Los Angeles County Department of Public Works
Environmental Programs Division
P.O. Box 1460
Alhambra, CA 91802-1460

SUBJECT: COMMENTS TO THE LOS ANGELES COUNTY DRAFT
COUNTYWIDE SITING ELEMENT, THE DRAFT COUNTYWIDE
INTEGRATED WASTE MANAGEMENT SUMMARY PLAN, AND
RELATED ENVIRONMENTAL DOCUMENTS.

Dear Mr. Stone:

This letter contains our comments on the following documents which have been prepared by the Los Angeles County Department of Public Works, Environmental Programs Division:

1. PROPOSED NEGATIVE DECLARATION, INITIAL STUDY AND ENVIRONMENTAL ASSESSMENT, FOR THE SUMMARY PLAN, OF THE LOS ANGELES COUNTY, COUNTYWIDE INTEGRATED WASTE MANAGEMENT PLAN (INITIAL STUDY).
2. PRELIMINARY DRAFT, VOLUMES I AND II, SUMMARY PLAN, OF THE LOS ANGELES COUNTY, COUNTYWIDE INTEGRATED WASTE MANAGEMENT PLAN (DRAFT SUMMARY PLAN).
3. DRAFT ENVIRONMENTAL IMPACT REPORT, LOS ANGELES COUNTY, COUNTYWIDE SITING ELEMENT (EIR/SITING ELEMENT)
4. PRELIMINARY DRAFT, LOS ANGELES COUNTY, COUNTYWIDE SITING SITING ELEMENT (PRELIMINARY SITING ELEMENT).

COMMENTS TO THE DOCUMENTS

First, all of the documents were well prepared. They're logically organized and contain helpful features such as Tables of Contents, Executive Summaries, lists of appendices, pagination, bold headings, and other features that make it easy to go through the documents from start to finish, or to look up specific subject material. However, Volume II, of the Summary Plan, should include page numbers for at least the first page of each of the six listed appendices.

1. INITIAL STUDY

SECTION V, AIR QUALITY, (e):

Is the County suggesting that the 88 cities purchase electric-powered vehicles and/or vehicles powered by propane, methanol, or natural gas? If so, then, this mitigation measure is unacceptable because of its high cost.

2. DRAFT SUMMARY PLAN

1. Table ES-1: Goals, Policies, and Objectives: A date should accompany each objective to show when it will be implemented.
2. Table 4-2: Quantities of Solid Waste Collected: In the first column of the table, under 1990 disposal for Commerce, the amount entered should be corrected to read, 90,238 tons, along with a corresponding correction to the cubic yards. In the final Plan, the other two columns of the table should reflect the results from the 1995 disposal survey.
3. Table 5-1: Source Reduction Programs: In the Comments section, place a check mark under "Commercial Sector," "Awards and Public Recognition," and "Procurement Policies and Standards".
4. Table 5-3: Recycling Programs: For Commerce, place a check mark under "Drop-Off," "Buy-Back," "Contract/Franchised/Licensed Recycling Service," and "Technical Assistance". Additionally, remarks under "comments" should include, "Existing programs include citywide residential curbside recycling, participation in CSD greenwaste cover project, City Hall Office Paper Recycling."
5. Table 5-5: Existing Composting Programs: For Commerce, place a check mark under "Christmas Tree Program," "LACSD Landfill Cover," "Education/Promotion," "Technical Assistance". In the Comments section, add "Compost demonstration program at City Hall".
6. Table 5-7: Existing Special Waste Programs: For Commerce, place a check mark under "Offer Periodic Collection", "Ash".
7. Table 5-9: Existing Education and Public Education Programs: For Commerce, place a check mark under "Newspaper, Articles, and Press Releases," "Advertisements, Brochures, Fact Sheets, Videos and Slide Shows," "Special Events, Exhibits, and Displays," "Recognition Awards," "Technical Assistance," and "Inter-jurisdictional Coordination". The Comments section should state, "Commercial/Industrial sectors technical assistance and awards".

C2

C2

As it indicates, it is only a suggestion. Before it can be implemented a detailed study could be done by participating jurisdictions to determine cost/benefit and other relevant issues.

8. **Table S-14: Existing Household Hazardous Collection Waste Programs: For Commerce, state under Comments, state, "Load Check required for citywide residential curbside collection program".**

9. **Table 6-1: Jurisdictional Funding Sources: For Commerce, under Funding Source, add "Refuse Hauler Gross Receipts Fee".**

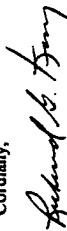
3. **DRAFT ENVIRONMENTAL IMPACT REPORT SITING ELEMENT**

1. **Typo: Page 2-10, Paragraph 2.7.3, second paragraph, first sentence, change "...have identified..." to, "...have been identified..."**

4. **DRAFT COUNTYWIDE SITING ELEMENT**

No comments.

Cordially,



Richard King
Environmental Services Coordinator

RK/r

cc: I. Gwin, Director Community Development
R. Ramirez, Asst. Director Community Development

CITY OF MONTEREY PARK
320 west newmark avenue • monterey park, ca 91754-2896
• municipal services center



June 14, 1996

Donald L. Wolfe
Los Angeles County Department of Public Works
Environmental Programs Division
P.O. Box 1460
Alhambra, CA 91802-1460

RECEIVED

JUN 17 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

**DRAFT COUNTYWIDE SITING ELEMENT, SUMMARY PLAN, AND
RELATED ENVIRONMENTAL DOCUMENT COMMENTS**

Dear Mr. Wolfe:

The City of Monterey Park has reviewed the draft Countywide Siting Element (CSE), Summary Plan, and related Environmental Documents and offers the following comments. The City appreciates the large volume of data that had to be consolidated and/or analyzed to allow for the preparation of these plans in accordance with State regulations. Although the comments below are of concern to the City, overall the City supports these draft documents.

COUNTYWIDE SITING ELEMENT

State law requires the Countywide Siting Element (CSE) to demonstrate fifteen years of permitted disposal capacity, or identify how this disposal capacity will be secured. The County's draft CSE identifies a combination of new disposal facilities and facility expansions as Los Angeles County's methods to meet this requirement. Waste export is identified only as supplemental to these activities.

1. The majority of the potential new sites identified in the CSE, as well as some of the proposed expansions are known to face strong opposition. Although these sites may not ultimately result in viable locations for the development of new disposal facilities or the expansion of existing ones, the City of Monterey Park recommends that they remain part of the CSE. Identification of these sites in the CSE does not mean that these sites will ever be developed. However, if they are removed from the CSE they cannot ever be developed as a disposal facility unless the CSE is amended. Amending the CSE is a

C3.1
C3.1 Comment noted.

significant process as it requires approval from a majority of the County's cities representing a majority of the incorporated population.

2. As the majority of potential new sites and proposed existing facility expansions identified in the CSE face strong opposition, the possibility exists that they may not ever be developed. Thus, the City of Monterey Park recommends that waste export complemented by MRF development be given primary roles in the plan and not just identified as supplemental activities.

Although not specifically required by the regulations, MRF development will soon be a critical component of the County's waste disposal system. Specifically, the City feels that the County and Sanitation District should pursue MRF development on already existing landfill sites. These sites are an ideal location for MRFs as they already have dealt with local land use issues and already possess a Solid Waste Facilities Permit. Use of these sites would also facilitate a regional approach to waste management.

SUMMARY PLAN

1. Table 4-1 Organization of Services (page 4-7) - Monterey Park's listing under the column labeled "Commercial - Type of Service" is incorrect. Under this column, Monterey Park is listed as "contracts". Monterey Park's commercial haulers do not require a contract to collect in the City, they require a business license. Please correct.

2. Table 4-2 Quantities of Solid Waste Collected (p. 4-11) - This table depicts waste disposal as identified in local jurisdiction SRREs, reports from the State's Disposal Quantity Reporting System, and local jurisdiction phone surveys. Given the known problems with many jurisdictions' base year data and the inaccuracies of the Disposal Quantity Reporting System, it is unfair to list these two figures without significant explanation of the issues surrounding their reliability. For these reasons, along with the existence of the State's base-year adjustment methodology (which should also be discussed), it should be very clearly indicated that the figures provided in this table cannot be used to calculate local jurisdiction diversion levels. This discussion should include the following points.

Base-Year Problems - On a countywide basis, the SRRE identified base-year disposal data is known to be significantly underreported. This underreporting should be mentioned. In addition, many jurisdictions, including Monterey Park are currently in the process of revising these base-year figures. This should also be noted.

Disposal Quantity Reporting System Problems - The difficulties with the accuracy of the Disposal Quantity Reporting System also require explanation. This explanation should include the inability to verify the accuracy of the waste generation sources provided by landfill customers at the disposal facilities. In addition, it should be mentioned that if a landfill customer does not know the point of origin of waste, that this waste is automatically assigned to the jurisdiction where that landfill customer is headquartered.

3. Appendices - Monterey Park Survey Form - The following items on Monterey Park's phone survey form should be corrected. Applicable areas throughout the Summary Plan should also be changed to reflect these corrections.

4) Contact person name should be changed From Larry Koch to Tina Lackey. Other related information is correct.

13) Type of Commercial Service should be changed from "contracts" to "permits/license".

The following items on Monterey Park's Recycling Implementation Programs Table should be corrected. Applicable areas throughout the Summary Plan should also be changed to reflect these corrections.

14) Rate Structure Modifications - Planned program column should be changed to read "yes" as this is a program identified in the City's SRRE.

39) Other Programs - Planned program column should be changed to read "yes" and the line "yard waste ban" added to the comments column as this is a program identified in the City's SRRE.

48) Large Item Pick-up - Planned program column should be changed to read "yes" as this is a program identified in the City's SRRE.

ENVIRONMENTAL IMPACT REPORT

1. Chapter Six, Environmental Impact Analysis/Mitigation Measures may be revised to clearly separate suggested mitigation measures from the analysis. They are not consistent with those identified in Table ES-4.

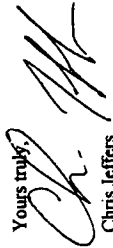
NEGATIVE DECLARATION

No comments.

C3.2 C3.2 Statement noted.

If you have any questions regarding these comments, please call Tina Lackey of the City's Public Works Department at (818)307-1383.

Yours truly,



Chris Jeffers
City Manager

TJL:CJ

cc: Ray Hamada, Planning Division

CITY COUNCIL

LEONIS C. MALBURG
Mayor

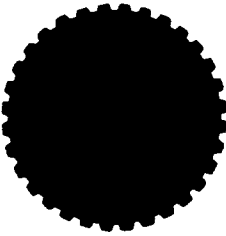
THOMAS A. YBARRA
Mayor Pro-Tem

Wm. "BILL" DAVIS
Councilman

H. "LARRY" GONZALES
Councilman

W. MICHAEL McCORMICK
Councilman

BRUCE V. MALKENHONST
City Administrator/City Clerk
FAX: (213) 581-7924



CITY HALL

4305 SANTA FE AVENUE, VERNON, CALIFORNIA 90058
TELEPHONE (213) 583-5811

ENVIRONMENTAL HEALTH DEPARTMENT

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Director of Light & Power
FAX: (213) 583-1983

DAVE TELFORD

Fire Chief
FAX: (213) 581-1385

LOUIS ROSENKRANTZ

Police Chief
FAX: (213) 581-1178

June 17, 1996

Los Angeles County Department of Public Works
Environmental Programs Division
P.O. Box 1460
Alhambra, CA 91802-1460

Attn: Mike Mohajer

RECEIVED

JUN 18 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

SUBJECT: CITY OF VERNON COMMENTS ON THE JANUARY 1996 DRAFTS OF THE LOS ANGELES COUNTY COUNTYWIDE SITING ELEMENT, INTEGRATED WASTE MANAGEMENT SUMMARY PLAN, AND SUPPORTING ENVIRONMENTAL DOCUMENTS

Dear Mr. Mohajer:

Thank you for the opportunity to review and comment on the preliminary drafts of the subject documents. Our department makes the following comments and/or recommended changes as referenced by page and paragraph (§) number of the respective documents:

Preliminary Draft of the Los Angeles Countywide Siting Element:

- Page xvi, § 3: Daily cover does not control erosion, but is more aptly described as being subject to erosion. Therefore, we recommend removing the reference to erosion control as a functional criterion in the definition of alternative daily cover. [Title 14 of the California Code of Regulations (14 CCR), the apparent source of this definition, is being revised to reflect this change].
- Page xvi, § 8: The definition of compost addresses only green waste, yet manure and biosolids are also commonly utilized feedstocks for composting. Therefore, we recommend including these items in the definition as they relate to feedstocks.



Preliminary Draft of the Los Angeles Countywide Siting Element
(continued):

- Page xx, ¶ 8: Not all permitted solid waste landfills in L.A. County have land use or conditional use permits, i.e., Antelope Valley, Pebbly Beach, etc.
- Page xxi, ¶ 10: AB 939 differentiates composting from recycling and therefore so should the definition here for recycling.
- Page xxiii, ¶ 9: The definition of transformation includes biological conversion other than composting, but also excludes biomass conversion. To eliminate confusion, please define the term biomass conversion.
- Page 5-20, ¶ 2: The City of Long Beach Health Department is no longer the Local Enforcement Agency (LEA); instead, this LEA jurisdiction has been taken over by L.A. County Department of Health Services.
- Pages 5-20 to 5-22: Section (§) 5.5.6.2., Permitting Requirements, should also provide a description of a "Report of Composting Site Information", the technical report required for the permitting of a composting facility. This section should also reference the regulatory tier permitting requirements, commencing with § 18100 of 14 CCR.
- Pages 5-22 to 5-23: The correct term in § 5.5.6.3., Administrative Process, for the document submitted by the LEA to the California Integrated Waste Management Board (CIWMB) for approval is the "Enforcement Program Plan" or "EPP".
- Page 5-23, ¶ 4: According to § 18207 of 14 CCR, the LEA has 55 days (not 65 days as stated) after filing of the permit application package to submit a proposed permit to the CIWMB. In addition, the LEA has 30 days in which to accept or reject the application package as to meeting the requirements of § 18201.
- Page 8-6, ¶ 5: § 8.6.3. references the Hobart Intermodal Facility in the City of Vernon, yet neither the Source Reduction and Recycling Element (SRRE) nor the Non-disposal Facility Element (NDPE) for the city have identified this site. Please explain the source of this information.

Draft Summary Plan of the Countywide Integrated Waste Management Plan:

- Page xi, ¶ 5: To make this definition consistent with state regulations, we suggest adding the "control of blowing litter" to the functional criteria of alternative daily cover.
- Page xiv, ¶ 6: Add the terms "biosolids" and "manure" to the list of potential feedstocks for composting (see above comment).
- Page 5-(70): Table 5-1 (Summary of Existing Source Reduction Programs) should identify that the City of Vernon currently: (1) conducts Waste Evaluations; (2) distributes source reduction information to businesses as a part of ongoing Educational Efforts; and, (3) has Procurement Policies for the purchase of recycled-content products.
- Page 5-(79): Table 5-3 (Summary of Existing Recycling Programs) should identify that the City of Vernon currently participates in the Los Angeles County RMDZ (Recycling Market Development Zone) program.
- Page 5-(90): Table 5-7 (Summary of Existing Special Wastes Programs) should identify that the City of Vernon currently has a program for the Recycling of Street Maintenance Material and is recovering construction and demolition (C&D) debris such as asphalt and concrete.
- Page 5-(94): Table 5-8 (Summary of Selected Special Wastes Programs) should identify that the City of Vernon continues to develop and expand its program for the Recycling of Street Maintenance Material.
- Page 5-(98): Table 5-9 (Summary of Existing Education and Public Information Programs) should identify that the City of Vernon currently: (1) produces recycling-related articles for the Vernon Journal, a city-generated Newsletter; (2) distributes Brochures to local businesses on commercial recycling and waste minimization; (3) conducts Waste Evaluations; and, (4) provides Technical Assistance to Vernon Businesses interested in recycling programs.
- Page 5-(103): Table 5-10 (Summary of Selected Education and Public Information Programs) should identify that the City of Vernon plans to continue: (1) producing recycling-related articles in their Newsletter and (2) distributing Brochures on recycling and waste minimization, along with the other

Draft Summary Plan of the Countywide Integrated Waste Management Plan (continued):

selected programs identified in the table.

- Page 5-(109): Table 5-11 (Summary of Targeted Materials) should indicate that the City of Vernon has targeted Food Waste for recycling (R) because of the numerous food processing and distribution facilities within the city.


Draft Environmental Impact Report for the Siting Element and Proposed Negative Declaration for the Summary Plan:

- We have reviewed the subject environmental documents and make no comments at this time.

We would like to take this opportunity to commend your staff on their outstanding efforts in preparing this well-organized and comprehensive set of documents.

If you have any questions or concerns regarding our comments, please contact Mr. Paul Manasjan at (213) 583-8811, ext. 232.

Sincerely,



Lewis J. Fozzebon, R.E.H.S.
Director/Health Officer

c: Bruce Malkenhorst, City Administrator

C4 C4 Statement noted.



City of La Puente

15900 E. Main Street La Puente, CA 91744 Telephone (818) 855-1500 Fax (818) 961-4626

September 12, 1996

Mr. Donald L. Wolfe
Deputy Director
Department of Public Works
County of Los Angeles
P.O. Box 1460
Alhambra, CA 91802-1460

RECEIVED

SEP 18 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Dear Mr. Wolfe:

City Staff has reviewed the following documents with regards to their accuracy and impact towards the City of La Puente's Source Reduction and Recycling Element (SRRE) and Household Hazardous Waste Element (HHWE):

1. Los Angeles County Countywide Siting Element (Draft)
2. Summary Plan, Countywide Integrated Waste Management Plan; Volume II (Draft)
3. Environmental Impact Report for the Siting Element (Draft)
4. Proposed Negative Declaration for the Summary Plan

City Staff discovered no conflicts within the documents listed above and the waste management objectives specified in the City of La Puente's SRRE and HHWE.

Thank you for the opportunity to review these documents. If you have any questions, please contact me at (818) 855-1500.

Sincerely,

Steve Hauerwaas
Management Assistant/Solid Waste Coordinator

Edmond L. Chaves Mayor Pro Tem
Sally Haignis-Fallon Council Member
George Caplan Council Member
Louis B. Perez Council Member
Robert G. Cullerz City Manager

C5

C5 Comment noted.



KERN COUNTY WASTE MANAGEMENT DEPARTMENT

Daphne H. Washington, Director
2700 "M" Street, Suite 500
Bakersfield, CA 93301
(805) 862-8900
(800) 552-KERN (option 6)
Fax: (805) 862-8901

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MAR 28 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

File: 20012

Michael Mohajer
Los Angeles County Department of Public Works
Environmental Programs Division
P.O. Box 1460
Alhambra, CA 91802-1460

RE: LOS ANGELES COUNTY COUNTYWIDE SITING ELEMENT, DRAFT ENVIRONMENTAL IMPACT REPORT, COUNTYWIDE INTEGRATED WASTE MANAGEMENT SUMMARY PLAN, AND NEGATIVE DECLARATION

Dear Mr. Mohajer:

The Kern County Waste Management Department has reviewed these documents and has no comments. The Department would like to commend your division on the level of thoroughness of your product.

Thank you for the opportunity to review these documents.

G1

G1 Comment noted.

Sincerely,

DAPHNE H. WASHINGTON, Director

By: Susan L. Reid, AICP
RMDZ Coordinator

RL:MM
RLRTTRENJ010212LRU

(This letter is superseded by a subsequent letter from the Governor's Office of Planning and Research dated June 17, 1996)



State of California
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

PETE WILSON
GOVERNOR



LEE BRISSON
DIRECTOR

April 12, 1996

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APR 16 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

DAVID SMITH
L.A. COUNTY DEPT. OF PUBLIC WORKS
900 SOUTH FREMONT AVENUE
ALHAMBRA, CA 91803

Subject: SUMMARY PLAN OF THE COUNTYWIDE INTEGRATED WASTE
MANAGEMENT N SCH #: 96031033

Dear DAVID SMITH:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

G2
Statement noted.

131033

MAIL TO: STATE CLEARINGHOUSE, 1405 TWENTY STREET, ROOM 121, SACRAMENTO, CA 95811 -- (916) 445-0011

NOTICE OF COMPLETION AND ENVIRONMENTAL DOCUMENT TRANSMITTAL FORM

See note below
CDD

1. Project Title: GENERAL PLAN OF THE COMMUNITY JEROME MOUNTAIN MANAGEMENT PLAN
 2. Lead Agency: SACRAMENTO COUNTY PUBLIC WORKS DEPARTMENT
 3. City/County: SACRAMENTO, CA
 4. City/County: ALBANY, CA
 5. Phone: (916) 439-3383
 6. County: SACRAMENTO
 7. County: ALBANY
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1. State Clearinghouse Contact: Mr. Chris Babbly (916) 445-0011
 2. State Review Begins: 3-13-96
 3. Dept. Review to Agency: 4-5
 4. Agency Review to SCH: 4-10
 5. SCH COMPLIANCE: 4-12
 6. Please note SCH Number on all Comments: 96031033
 7. Please forward his comments directly to the Lead Agency
 8. AOMD/AFCD (Resources): 3/16

Project Sent to the following State Agencies

<input checked="" type="checkbox"/> Resources	<input type="checkbox"/> State/Consumer Drive
<input type="checkbox"/> Boating	<input type="checkbox"/> State Services
<input type="checkbox"/> Coastal Comm	<input checked="" type="checkbox"/> CARRP
<input type="checkbox"/> Coastal County	<input checked="" type="checkbox"/> ARB
<input type="checkbox"/> Conservation	<input checked="" type="checkbox"/> CA Waste Mgmt Bd
<input checked="" type="checkbox"/> Fish & Game # 5	<input type="checkbox"/> SWRCB: Grass
<input type="checkbox"/> Data Protection	<input type="checkbox"/> SWRCB: Delta
<input type="checkbox"/> Parks & Rec/OHP	<input type="checkbox"/> SWRCB: Wet Quality
<input type="checkbox"/> Reclamation	<input type="checkbox"/> SWRCB: Wet Rights
<input type="checkbox"/> BCCDC	<input checked="" type="checkbox"/> SWRCB: # 7
<input checked="" type="checkbox"/> DWR	<input type="checkbox"/> DYS/CCTC
<input type="checkbox"/> Bee Trap/Hous	<input type="checkbox"/> YB/ABR Corrections
<input type="checkbox"/> Arroyos	<input type="checkbox"/> Independent Comm
<input type="checkbox"/> Air Plans # 7	<input type="checkbox"/> Energy Comm
<input checked="" type="checkbox"/> Trans Planning	<input type="checkbox"/> PUC
<input type="checkbox"/> Housing & Devel	<input type="checkbox"/> State Lands Comm
<input checked="" type="checkbox"/> Health & Welfare	<input type="checkbox"/> Tobacco Reg Plan
<input type="checkbox"/> Drinking H2O	<input type="checkbox"/> Other:
<input type="checkbox"/> Medical Waste	

April 30, 1996
Mr. Michael Mohajer
Page 2

**COMMENTS ON THE PRELIMINARY DRAFT SUMMARY PLAN
OF THE LOS ANGELES COUNTY
COUNTYWIDE INTEGRATED WASTE MANAGEMENT PLAN
AND PROPOSED NEGATIVE DECLARATION INITIAL STUDY
AND ENVIRONMENTAL ASSESSMENT FOR THE SUMMARY PLAN**

PROJECT DESCRIPTION

The Los Angeles County Department of Public Works has prepared the Preliminary Draft Summary Plan of the Los Angeles County Countywide Integrated Waste Management Plan and Proposed Negative Declaration Initial Study and Environmental Assessment for the Summary Plan.

The Summary Plan establishes Countywide goals, policies and objectives for integrated waste management; establishes an administrative structure for preparing and maintaining the Summary Plan; describes the Countywide system of governmental solid waste management infrastructure; describes the current system of solid waste management in the unincorporated County and the 88 incorporated cities; summarizes the types of programs planned in the individual jurisdictions' Source Reduction and Recycling Elements (SRREs), Household Hazardous Waste Elements (HHWEs), and Nondisposal Facility Elements (NDFEs); and describes programs that could be consolidated or coordinated Countywide. The SRREs, HHWEs and NDFEs delineate the direction each jurisdiction proposes to go in order to reach the waste diversion goals of 25 percent by 1995 and 50 percent by the year 2000.

I. INTRODUCTION TO SCAG REVIEW PROCESS

The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management, Regional Mobility (being a summary of the 1994 Regional Mobility Element), Air Quality, Hazardous Waste Management, and Water Quality chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter.

April 30, 1996
Mr. Michael Mohajer
Page 3

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG.

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the project with those policies.

II. CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE

A. Core Chapters

1. *The Growth Management Chapter (GMC) includes both core and ancillary policies in the mandated portion of the chapter that are particularly applicable to this project. The GMC policies relate to the three RCPG goals: to improve the regional standard of living, to maintain the regional quality of life, and to provide social, political, and cultural equity. To achieve these goals, SCAG encourages the development of urban forms that enable individuals to spend less income on housing, minimize public and private development costs, and that enable the private sector to be more competitive, thereby strengthening the regional economy. Attaining mobility and clean air goals is also critical in enhancing the quality of life in the region and can be achieved through the development of urban forms that accommodate a diversity of lifestyles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities. Lastly, SCAG encourages the development of urban forms that avoid economic and social polarization and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the following policies is intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.*

a. *Core Growth Management Policies*

3.01 *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

SCAG staff comments. The Summary Plan utilizes SCAG's 1994 population and employment forecasts from the 1990 baseline to year 2000.

b. *Ancillary Growth Management Policies*

3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

SCAG staff comments. The Summary Plan includes as a goal to facilitate an integrated waste management system of services and programs that will assist participating jurisdictions in achieving long-term economies of scale. The related policies and objectives should help to minimize the cost of solid waste infrastructure and public service delivery. A critically important objective in the Summary Plan is the promotion of land use policies to discourage incompatible land uses between the existing, expansion of existing, and new solid waste management facilities identified in the Countywide Siting Element and adjacent areas. Funding for the various programs in the SRREs have been identified in many instances and some jurisdictions have stated specific goals or objectives addressing the use of regional funding activities or grants to assist in implementation activities.

3.11 *Support provisions and incentives created by local jurisdictions to attract housing growth in job-rich subregions and job growth in housing-rich subregions.*

SCAG staff comments. The Summary Plan includes activities aimed at strengthening and developing markets for recycled or composted materials and products and specific efforts to stimulate economic activity in the county's approved Recycling Market Development Zones. These efforts should help stimulate job growth in housing-rich subregions.

2. *The Regional Mobility Chapter (RMC) also has policies, all of which are core, that have been analyzed for applicability to the proposed project. This chapter links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. There are no policies in this chapter which are applicable to the Summary Plan.*

April 30, 1996
Mr. Michael Mohajer
Page 5

3. The Water Quality Chapter (WQC) includes core recommendations and policy options that are potentially applicable to this project. The recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters. There are no policies in this chapter which are applicable to the Summary Plan.

4. The Hazardous Waste Management Chapter (HWMC) includes core policies that are potentially applicable to this project. The policies relate to the two hazardous waste goals: to promote the following waste management hierarchy for hazardous wastes: 1) waste reduction 2) recycling and reuse 3) safe disposal; and, to ensure adequate, appropriate, and environmentally safe waste management capacity in the region. There are no policies in this chapter which are directly applicable to the Summary Plan. However, specific actions identified in the County and local cities' HHWEs are supportive of the HWMC goals of: promoting a waste management hierarchy through 1.) waste reduction, 2.) recycling and reuse, and 3.) safe disposal; and, ensuring adequate, appropriate and environmentally-safe waste management capacity.

5. The Air Quality Chapter (AQC) includes policies that are potentially applicable to this project. These policies are presently being characterized as core and ancillary. There are no policies in this chapter which are applicable to the Summary Plan.

B. Ancillary Chapters

1. The Integrated Solid Waste Management Chapter (ISWM) is non mandated; it is provided for information and advisory purposes. The recommendations in the chapter fulfill the chapter's objectives and do not create new legal mandates for local governments or other regional governmental organizations, like sanitation or waste management districts. The chapter includes the following policy recommendations:

14.1 Developing recycling industries and self sustaining markets for recycled materials.

SCAG staff comments. The Summary Plan includes activities aimed at developing recycling and composting industries and self sustaining markets for recycled materials. The plan identifies specific efforts to stimulate economic activity in the county's approved Recycling Market Development Zones.

14.2 Encouraging a reduction in overlap in waste prevention public awareness campaigns.

SCAG staff comments. The Summary Plan encourages local programs which should help reduce the overlap in waste prevention campaigns. The Solid Waste Task Force is identified as the vehicle for assisting cities in securing public education and promotional materials, thus supporting the goal of increased public awareness and participation in various waste management activities. These efforts should build upon the state's strong public awareness waste prevention campaigns.

14.3 Economic impacts of increased waste management costs.

SCAG staff comments. The Summary Plan includes as an important goal to facilitate an integrated waste management system of services and programs that will assist participating jurisdictions in achieving long-term economies of scale. These cooperative efforts should help to minimize the impacts associated with increased waste management costs. Similar efforts in support of this air are goals in the Summary Plan to expand the number and scope of cooperative waste diversion activities and projects; and, the elimination or reduction of barriers between jurisdictions, agencies, and private enterprises in order to create new opportunities for diversion program implementation.

14.4 Promote new technologies.

SCAG staff comments. The Summary Plan includes an important goal of assuring adequate long-term solid waste disposal capacity for cities and County unincorporated areas. A related policy states that the Solid Waste Task Force will actively seek and identify transformation technologies. This policy could be expanded to include the promotion of new transformation technologies. Information on new technologies is available in the County Public Works Department's files and will be available from SCAG's Solid Waste Task Force study which is currently in process.

14.5 Facilitating regional dialogue on intercounty waste disposal projects.

SCAG staff comments. The Summary goal to "assure adequate long-term solid waste disposal capacity for cities and County unincorporated areas" could also be explicitly supported by the two policies under goal 2.4.6 of the Preliminary Draft Siting Element, relating to the promotion and support of environmentally sound and technologically feasible rail haul projects. Los Angeles County and its local jurisdictions are encouraged to continue to participate in the regional dialogue on intercounty waste disposal projects and their associated support facilities.

April 30, 1996
Mr. Michael Mohajer
Page 7

CONCLUSION

As described above, the Summary Plan and its Proposed Negative Declaration Initial Study and Environmental Assessment are generally consistent with pertinent policies in the Regional Comprehensive Plan and Guide.

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Comment noted.



METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

RECEIVED

JUN 20 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

June 13, 1996

Mr. Michael Mohajer
Los Angeles County Department of Public Works
Environmental Programs Division
P.O. Box 1460
Alhambra, California 91802-1460

Dear Mr. Mohajer:

Draft Environmental Impact Report for the Los Angeles County Countywide Siting Element and Negative Declaration for the Countywide Integrated Waste Management Summary Plan

We have received the Draft Environmental Impact Report (EIR) for the Los Angeles County (County) Countywide Siting Element (Siting Element) and the Negative Declaration for the Countywide Integrated Waste Management Summary Plan (Summary Plan). The Siting Element addresses the solid waste disposal needs of all 88 cities and unincorporated communities in the County for a 15-year planning period. The Summary Plan addresses the elements of the countywide solid waste management planning process, which includes the Source Reduction and Recycling Elements, Household Hazardous Waste Elements, and Nondisposal Facility Elements. The comments herein represent the response of the Metropolitan Water District of Southern California (Metropolitan) as a potentially affected public agency.

Metropolitan commented on the Notice of Preparation of a Draft EIR for the Siting Element on February 28, 1995. A copy of these comments is provided for your review and information. In addition to our previous comments, we are providing comments on both the Draft EIR for the Siting Element and the Negative Declaration for the Summary Plan.

Background

Metropolitan was formed in 1928 under an enabling Act of the California legislature. Historically, Metropolitan has provided supplemental water to the southern California coastal plain to augment local water supplies developed by surface catchment, groundwater production, and wastewater reclamation. This supplemental water is delivered to 27 member agencies through a regional network of canals, pipelines, reservoirs, treatment plants, and appurtenant works. Metropolitan receives water from the California Aqueduct of the State Water Project and from the Colorado River Aqueduct for distribution to about 250 cities and unincorporated communities within a 5,200-square-mile

Mr. Michael Mohajer

-2-

June 13, 1996

service area covering portions of Ventura, Los Angeles, Orange, Riverside, San Bernardino, and San Diego counties. Metropolitan currently provides about 55 percent of the water used in this service area, with remaining supplies consisting of local groundwater and surface water (37 percent) and water imported by the City of Los Angeles via the Los Angeles Aqueduct (8 percent).

Comments on the Draft EIR for the Siting Element

Metropolitan requests that the following issues be addressed in the Final EIR and its Appendices:

Chapter 5. Section 5.4 - Water Quality

This section should be expanded to include a discussion of the relationship between existing disposal sites and groundwater aquifers. Specifically, this section should include the following: 1) identification of all existing disposal sites that overly groundwater aquifers or have the potential to contribute leachate to a groundwater aquifer; 2) identification of the existing groundwater protection system used at each disposal site associated with a groundwater aquifer; 3) data regarding the effectiveness of each of these systems; and 4) the impacts that existing solid waste disposal sites currently present to drinking water supplies.

Chapter 6. Environmental Impact Analysis and Mitigation Measures

The Draft EIR as written will permit the expansion and/or new construction of solid waste disposal facilities in areas that provide recharge to regional aquifers. These facilities will include the installation of an engineering system that meets federal and State regulations. Metropolitan believes that these engineered systems cannot ensure proper protection of the underlying groundwater. Factors such as differential settlement and municipal waste that contains low molecular weight solvents have caused these types of systems to fail in the past. The failure of an engineered system at a solid waste disposal site that overlies a groundwater aquifer would result in the release of hazardous materials into the groundwater, thereby limiting the aquifer's capability to supply potable drinking water.

Appendix B - Solid Waste Disposal Facility Siting Criteria

Page B-15, Aqueducts and Reservoirs

The Siting Criteria should also include specific distances from disposal sites to aqueducts. These distances should not be less than 500 feet horizontally from the property line of the disposal site to the easement or property line of the aqueduct. No disposal site should be located above any aqueduct or water conveyance conduit or located within any watershed tributary to a reservoir.

Page B-18, Proximity to Supply Wells and Well Fields

This section should specify recommended minimum distances from disposal sites to well fields and supply locations.

Page B-19, Depth to Groundwater

This section should specify minimum distances from the bottom of an impervious liner to the maximum anticipated ground water levels to prevent inundation of groundwater.

Page B-21, Major Aquifer Recharge Areas

This section should specify that no waste disposal site will be located above known aquifer recharge areas.

Page B-22, Permeability of Surficial Materials

The last sentence of the third paragraph should be revised to read: "The lower component of which shall consist of a minimum of two feet of compacted soil/clay with a hydraulic conductivity of no more than 1x10-9 cm/sec." In addition, this section should be modified to prohibit the construction or expansion of landfills near permeable strata such as sand and gravel pits.

Mr. Michael Mohajer

-4-

June 13, 1996

Comments on the Negative Declaration for the Summary Plan

Metropolitan supports the Summary Plan's objectives and goals necessary to achieve integrated waste management. However, Metropolitan has several major water conveyance facilities within the County that require protection. The enclosed map shows Metropolitan's facilities within the County. It will be necessary for the County Department of Public Works to consider these facilities in its project planning.

In order to avoid potential conflicts with Metropolitan's facilities, we request that preliminary engineering design drawings or improvement plans for any activity in the area of Metropolitan's pipelines and rights-of-way be submitted for our review and written approval. You may obtain detailed prints of drawings of Metropolitan's pipelines and rights-of-way by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist you in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

We appreciate the opportunity to provide input to your planning process. If we can be of further assistance, please contact me at (213) 217-6242.

Very truly yours,

Laura J. Sibonek

Laura J. Sibonek
Principal Environmental Specialist

MME:rbbs

Enclosures

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Prior to development of a landfill, site-specific environmental impact reports will address the issues which you have raised regarding water conveyance facilities. These and other issues related to the siting of landfills are addressed in the Countywide Siting Element.

M M. Esku

February 28, 1995

Mr. David M. Smith
Waste Management Division
Los Angeles County Department of Public Works
P. O. Box 1460
Alhambra, California 91802-1460

Dear Mr. Smith:

Notice of Preparation of an Environmental
Impact Report for the Countywide Siting
Element for the County of Los Angeles

We have received the Notice of Preparation of an Environmental Impact Report (EIR) for the Countywide Siting Element for the County of Los Angeles (Siting Element). The Los Angeles County Department of Public Works, Waste Management Division proposes to establish policies and guidelines to address the solid waste disposal and transformation needs of Los Angeles County for the next 15 years. The comments herein represent the Metropolitan Water District's (Metropolitan) response as a potentially affected public agency.

Metropolitan requests that the protection of water resources be the primary consideration in evaluating potential landfill sites. To ensure the protection of water resources, Metropolitan requests that the following topics be considered in the EIR as part of the Siting Element's Siting Criteria:

- Proximity to water conveyance facilities -
Metropolitan requests that a site within a minimum of 500 feet of any of our existing or planned water conveyance facilities be prohibited;
- Landfill siting within a 100-Year floodplain -
To protect surface and groundwater resources, the California Code of Regulations prohibits Class III landfills to be sited within 100-year floodplains; and
- Landfill siting within the vicinity of aquifers -
Criteria to protect groundwater from land disposal facilities are based on meeting federal and state regulations. However,

Mr. David M. Smith

-3-

February 28, 1995

existing regulations do not adequately address groundwater protection; therefore, Metropolitan requests that the Siting Criteria prohibit the construction or expansion of landfills near permeable strata, such as sand and gravel pits.

Metropolitan will be submitting additional information in the next few days regarding the issues raised in this letter. We appreciate the opportunity to provide input to your planning process. If we can be of further assistance, please contact Ms. Mary Ann Dickinson at (213) 217-6799.

Very truly yours,

/s/Brian G. Thomas for Laura Simonek
Laura J. Simonek
Senior Environmental Specialist

MME

Distributed/3/1/95--drs

bcc: N. N. Flette
V. Gleason
L. J. Barrett/S. M. Walters
T. S. Tanaka
H. R. Kneeling
M. A. Dickinson
L. Anderson
T. Hampton
D. C. Man
B. G. Thomas
L. J. Simonek
J. B. Alpert
A. M. Reyes
M. M. Eskue
Planning Files

Surname: M. Eskue, A. Reyes, J. Alpert, L. Simonek, B. Thomas,
M. Dickinson, T. Tanaka, L. Barrett, N. Flette
C. Anderson, A. Sienkiewicz

(This letter supersedes the letter from the Governor's Office of Planning and Research dated April 12, 1996)

PETE WILSON, Governor



STATE OF CALIFORNIA

Governor's Office of Planning and Research

1400 Tenth Street
Sacramento, CA 95814

RECEIVED
JUN 25 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

June 17, 1996

DAVID SMITH
L.A. COUNTY DEPT. OF PUBLIC WORKS
900 SOUTH FREMONT AVENUE
ALHAMBRA, CA 91803

Subject: SUMMARY PLAN OF THE COUNTYWIDE INTEGRATED WASTE MANAGEMENT N SCH #:
96031033

Dear DAVID SMITH:

The State Clearinghouse has submitted the above named proposed Negative Declaration to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation.

These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency at your earliest convenience.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Enclosures
cc: Resources Agency

State of California

California Environmental
Protection Agency

M e m o r a n d u m

To: Chris Belsky

State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

David M. Smith

County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803

From:

Patrick Schiavo
Patrick Schiavo, Manager
Waste Characterization and Analysis Branch
Diversion, Planning, and Local Assistance Division
CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

Subject: SCH #96031033, Initial Study and Preliminary Draft of a
Negative Declaration (ND) for the County of Los Angeles's
Summary Plan (SP)

California Integrated Waste Management Board staff (staff) has
reviewed the subject documents. Following the project
description below, you will find staff's comments.

PROJECT DESCRIPTION

The SP summarizes all solid waste management activities in the
Source Reduction and Recycling Elements (SRREs), Household
Hazardous Waste Elements (HHWEs), and Nondisposal Facility
Elements for all the Cities in Los Angeles County and for the
County's unincorporated area. The SP does not provide for new
development projects to be undertaken.

The SRREs and HHWEs were subject to separate environmental
review.

of the Clearinghouse
Page 2

GENERAL COMMENTS

SP still finds no outstanding issues with the document. When submitting the final SP to the Board for consideration of approval, please be sure to send to the Board a copy of the Notice of Determination (NOD) filed with the County Clerk or State Clearinghouse, documenting the County's adoption of the final ND, to ensure that your final SP submittal is complete.

Thank you for the opportunity to comment on this document. If you have questions, please call Yasmin Satter at my stall at 316-355-2394.

G5

G5 Comment noted.

P12

Peggy McCain
2334 Westridge Road
Los Angeles, CA 90049
(310)471-6434

April 28, 1996

RECEIVED
MAY - 2 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

Mr. Mohajer, Project Director
Solid Waste Management
Department of Public Works
Los Angeles County
900 South Fremont Ave.
Alhambra, CA 91803

RE: Highest and Best Use of Mission, Rustic-Sullivan Canyons

Dear Mr. Mohajer:

Landfills are obsolete. The exorbitant cost of purifying contaminated water, soil, human health and land loss use leaves no other choice than to recycle. Los Angeles is one of the leading areas of the country and the world. It is time we become the leader into the 21st Century and encourage total recycling. One gentleman, attending the April 11th meeting said his recycling firm, recycles 100% of the solid waste.

The continual proposing of landfills for these and other canyons, is a waste of tax payer dollars. It appears none of the previous documented scientific work was used in your newly "recycled" landfill proposal. This again is a total waste of citizen's tax dollar and time which should be spent to encourage recycling firms. Let us address the problem. Science hand-in-hand with technology and business should be instrumental in solving the problem with the help of the Solid Waste Management to assist it through to implementation.

Enclosed are two information sheets. One covering the specific landfill area with other concerns of recycling, composting and landfill problems. The other an abbreviated listing which your publication *SUMMARY PLAN, Environmental Programs Divisions, Draft Negative Declaration*...this is amazing to find NO IMPACT in regard to the canyons. Below are the largest problems:

- Earthquake epicenter site at proposed southern/lower base of landfill.
- Contamination of Santa Monica potable water wells and Encino Reservoir.
- Health risk to large population area. Note separate enclosures.
- Traffic congestion is near gridlock in the western side of Los Angeles.
- Public Law 98-506 prohibits landfill sites on parkland areas.
- Fire hazard from landfill site.
- Noise pollution.
- Loss of a heavily used recreation area used by people from all parts of LA and surrounding parts which happens to be situated in a dense population area.
- Contamination of water and soil is exorbitantly expensive to rectify.

The present and future is recycling. Let's bury for once and for all the antiquated garbage dumps. The Roman garbage dumps still have leachate flowing from them after 2,000 years. Our Earth, her people, her wildlife and plant life are too precious to waste.

Recycle, recycle, recycle.



CC
Yaroslavsky
Braude

enclaves: 8

P1

P1 Refer to Topical Response in Appendix ND-A.

13891 Cranston Avenue
Sylmar, CA 91342
May 8, 1996

RECEIVED
MAY 16 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

Mr. David M. Smith
Environmental Programs Division
Los Angeles County Department of Public Works
P.O. Box 1460
Alhambra, CA 91802-1460

Dear Mr. Smith:

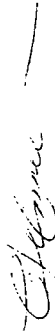
SUBJECT: Prelim. Draft LA Co. Countywide Siting Element and its DEIR
Prelim. Draft Summary Plan of the LA Co. Countywide
Integrated Waste Mgmt. Plan and its Proposed ND

On behalf of the Olive View Neighborhood Watch I offer the following
comments:

- 1) The Olive View Neighborhood Watch, representing over 1000
homeowners in the Sylmar - North San Fernando Valley area, voted at
its April 8, 1996 meeting to oppose both the creation of a Sanitary
Landfill at Elsmere Canyon and any extension of use at Lopez Canyon.
- 2) Neither the DEIR nor the ND adequately address such issues as
the "livability factor" on adjacent communities and residents.
- 3) The proposed Elsmere Canyon facility would abut the Wilson
Canyon Parkland portion of the Santa Monica Mountains Conservancy.
Neither the DEIR nor the ND address the impact of the dump on the Park
nor the wildlife.
- 4) Neither document addresses the impact of the prevailing Santa
Ana winds on down wind residents at Elsmere.
- 5) Neither document addresses Ground Water issues adequately at
Elsmere.

I would also like to call to your attention to the disproportionate
share of landfills currently under operation in the north San Fernando
Valley (8 out of 20) compared to the County as a whole and the
proposal to increase or expand only in that area or adjacent Santa
Clarita. There is a question of equity that is also NOI addressed
anywhere.

Sincerely yours,



P2

P2 Refer to Topical Response in Appendix ND-A.

Charles J. O'Connell, P.E.
Chairman
Planning and Landuse Committee
OLIVE VIEW NEIGHBORHOOD WATCH

Supervisor Zev Yaroslavsky
Supervisor Mike Antonovich
Senator Barbara Boxer
Congressman Buck McKeon
Congressman Howard Berman
Senator Hershel Rosenthal
Assemblyman Richard Katz
Councilman Hal Berson
Councilman Richard Alacon
City of Santa Clarita
US Forest Service, Angeles National Forest

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JUN 17 1996



Landfill Alternatives Save Environmental Resources

June 17, 1996

A California Non-Profit
Public Benefit Corporation

Participating Organizations:

- Citizens Against the Chiquita Canyon Landfill Expansion
- Coalition of West Covina Homeowners Associations
- Communities United for Safe Trash Management
- Foundation for the Preservation of the Santa Susana Mountains
- Friends of Caballero Canyon
- Friends of Pico Canyon
- Friends of Towles Canyon
- Humboldt Heights Improvement Association
- Keegi Canyon Civic Association
- Mothers and Others Against the Dump
- North Valley Coalition
- Ridge Trail Park Trust
- Santa Susana Citizens' Transportation Association
- Santa Susana Civic Association
- Santa Susana Oak Conservancy
- Santa Susana Organization for Planning the Environment
- Santa Susana Valley Canyons Preservation Committee
- Santa Susana Mountain Park Association
- Save Our Skyline
- Save the Angeles Foundation
- Val Verde Civic Association

Founding Members:

- Ed Ayres
- Glim Bailey
- Kona Berger
- Frank Carlsson
- Mary Edwards
- Jan Hinkton
- Ann Irvine
- Vera Johnson
- Jill Klajic
- Marta McLain
- Arlene Mead
- Cliff Meyer
- John P. Miller
- Karen Praxson
- Lynne Plumback
- Sue Via
- Rob Zapffe
- Anne Zisk

David M. Smith
Los Angeles County Department of Public Works
900 South Fremont Avenue
Alhambra, California 91803

Re: Countrywide Siting Element and DEIR

Dear Mr. Smith:

The following are the comments of LASER regarding the Los Angeles County Countywide Siting Element, including the Draft Environmental Impact Report, prepared by the Department of Public Works ("Department"). In general, it is LASER's position that in their present form, the above referenced documents are inadequate and must be withdrawn.

A.
Comments Specific To The Siting Element

1. The County's estimates for waste generation and disposal are inaccurate. The figures for January 1, 1990 should be based on actual average landfill disposal plus disposal in transformation facilities plus documented diversion by recyclers. No quantity should simply be assumed to have been diverted without substantiation (facility names, quantities, types of material, etc.). All imports should be deleted. 1995 need should be based on projections of this base year based on actual population growth and actual growth in either taxable sales or employment for Los Angeles County. There is no reason to assume that the County's share of state growth will remain the same. In fact, Los Angeles County has trended below many other state areas. According to an article in the March 8, 1996 edition of the Los Angeles Times (Atch. "A"), the population of Los Angeles County is growing less than the population of the State of California as

David M. Smith
June 17, 1996
Page 2.

a whole. Was the Department aware of this fact in preparing the Siting Element? If not, what actions does the County intend to take to revise the Siting Element to take this fact into account?

2. In addition to the deficiencies identified in the previous paragraph, there is no basis for adding 25 percent diversion on top of the 1995 disposal rates. This provides a higher generation volume than projecting from the AB 939 base year. Population has only increased a few percent since 1989 and economic indicators have gone down. Therefore, the 1995 generation rate should be about 4 percent lower than 1990. Even if none of the disposal volume was from imports, the MSW generation rate in 1995 should be about 43,200 tons per day rather than 51,000 tpd. The landfill disposal rate, considering actual transformation, should be 30,700 tpd. If 10 percent of the total waste stream is committed to transformation, the 1995 landfill rate would drop to 28,100 tons per day.

3. Future projections (of the type now appearing at pages 4-14 and 4-15 of the Siting Element) should be based on the data discussed in the previous two paragraphs, with possible corrections to reflect state-wide growth at a recorded or assumed ratio (lower) of Los Angeles County to the State of California as a whole. The residential generation rate should vary with population only. Ten percent transformation or out-of-county disposal should be reflected in landfill need projections. The growth rate from 1995 on should fall somewhere about 0.5 percent per year for residential and 1.2 percent per year for commercial, for a composite growth rate of about 0.9 percent per year. Using this rate, MSW totals in the year 2000 will be 45,200 tpd, and landfill requirements will be 18,100 tpd, with 50 percent diversion and ten percent transformation.

4. AB 939 does not require the disposal sites to be in-county or even in-state. Why aren't out-of-county landfills accorded the same prominence as in-county landfills in the relevant portions of the Siting Element (such as disposal capacity tables and the Summary Plan)? LASER suggests that "Scenario A" be replaced with an alternative which relies on East Carbon Canyon, La Paz, Franconia, and in-state truck haul facilities for the County's excess capacity requirements (if any). The County must consider available out-of-county capacity and incorporate this capacity into its "time to crisis" scenario. Not to consider out-of-county capacity is an deficiency under the California Environmental Quality Act ("CEQA"). These figures must appear in the Siting Element, to give an accurate view of the capacity that is really needed in Los Angeles County.

5. Page 2-3 of the Siting Element states that as a matter of policy the County and other will "encourage and assist other

David M. Smith
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Page 3.

jurisdictions in utilizing, to the maximum extent feasible, disposal capacity available for expansion within their boundaries The only specific "encouragement" to be offered in this regard is the expansion of five landfills. Why did the Department choose to adopt a "feasibility" standard rather than a "necessity" standard? It is our position that landfill expansions should occur only to the maximum extent necessary--not the maximum extent feasible. In other words, it is grossly improper for the Department to adopt a policy that in effect "maximizes" the likelihood that landfill expansions will occur. Does the Department agree that the Siting Element in its current form favors the expansion of landfills over alternative waste disposal methods, in violation of the waste disposal hierarchy established by the federal government? What meaningful steps is the Department prepared to take to encourage alternatives to landfills "to the maximum extent feasible," thereby elevating these alternatives to their rightful place ahead of landfills in this hierarchy? Why doesn't the Siting Element state that the County will support composting facilities as a source of disposal capacity, in view of the fact that at least one such facility has been proposed in this County? During the Siting Element hearings a Department employee mentioned that opposition had been expressed to a proposed composting facility before the Planning Commission. If this is a reason why the composting facility is not listed in the Siting Element as a source of disposal capacity, why doesn't the Siting Element consider the greater opposition that has been expressed for many years to the landfills that are listed in the siting element?

6. Page 8-2 of the Siting Element states that the County cannot restrict the importation of solid waste from other counties because solid waste is subject to the commerce clause of the United States Constitution. During the hearing on April 16, Mr. Mohajer stated that he agreed with the opinion expressed by County Counsel in his letter of September 27, 1994. Does this agreement include the letter's statement that "the County may be able to avoid a direct effect on interstate commerce, if it is undertaking comprehensive programs to implement State mandated solid waste management requirements, by way of plan restrictions on landfilling" (see Atch. "B")? If so, what plan restrictions on importation of waste are reflected in the Siting Element or Environmental Impact Report? Does the Department also agree with the letter's statement that the County should "demonstrate whether restrictions on the import of solid waste across the boundaries of the County would have any discernable effect on interstate commerce and whether the restrictions would advance a legitimate local interest"? Has this demonstration been made in the Siting Element or Environmental Impact Report? If the Department has concluded that there is a discernable effect on interstate commerce, what facts support this conclusion? Does

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the Department agree with the statement in the September 27 letter that due to the distance between Los Angeles County and the nearest state border, the commerce clause may not prohibit restrictions on the importation of trash into Los Angeles County? During one of the Siting Element hearings a Department representative stated that determining whether there was a discernable effect on interstate commerce was not the Department's responsibility. If this is in fact the Department's position, why do any statements about the commerce clause appear in the Siting Element? Are landfill operators going to be allowed to use out-of-county trash to fill the capacity claimed to be needed for Los Angeles County? Is Los Angeles County soliciting or encouraging the importation of trash into the County? If so, why? Is it to generate more revenue from tipping fees? If the importation is instead occurring at the instigation of private interests, why is the County allowing valuable landfill space to be controlled by private operators? Failing to quantify the amount of in-county landfill capacity that will be consumed by waste that comes from outside of Los Angeles County is a deficiency under CEQA.

7. The Siting Element states at page 1-14 that the Browns Canyon site has been ruled out based on geological considerations. Why is the County continuing to advocate landfill sites in the same geologically unstable area (i.e., Blind, Sunshine, Towsley and Elsmere Canyons), or landfills that are inaccessible due to recent property acquisitions by the Santa Monica Mountains Conservancy (Towsley and Mission-Rustic-Sullivan Canyons)? Does the County intend to reach an agreement with the Conservancy or other agencies in order to obtain access to these sites? In cases where the County does not have legal access to these sites the Siting Element and EIR should so state. Acquisition costs and the time required for acquisition should also be set forth and quantified. The failure of the relevant documents to contain this information is a deficiency under CEQA.

8. Why has a negative declaration been issued for the Summary Plan, a document that includes the Countywide Siting Element (which in turn requires an EIR)? Is the County attempting to prepare a Program EIR? If so, the obvious negative environmental impacts mentioned in the Siting Element preclude a negative declaration.

9. Since the Task Force is named in the Acknowledgements section of the Siting Element as a co-preparer of the Siting Element (along with the Department) did all members of the Task Force have equal access to the draft documents as they were being prepared? If not, why not?

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P3 Refer to Topical Response in Appendix ND-A.

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Page 5.

10. If the goals of the Siting Element include specific actions regarding specific proposed landfill sites, each such site should be separately studied in the Siting Element DEIR. The Summary Table of Environment Impacts in the Siting Element is inadequate. Mitigations must be actions taken by the project proponent to ameliorate environmental impacts. Adherence to City or County codes is not mitigation. Nor is monitoring by the proponent or a City or County agency. Many of the impacts will have to be discussed site by site if the Siting Element has goals relating to specific sites (i.e., pursuing the opening of Elsmere Canyon or the expansion of Sunshine Canyon). Will the Department revise the Siting Element in response to the above comments?

11. Please explain how the Siting Element will not result in "irreversible environmental changes" if the Siting Element goals include opening Elsmere Canyon, reopening Lopez Canyon and expanding Sunshine Canyon. Not to identify site-specific environmental impacts to these landfills is an deficiency under CEQA.

B.
Comments Specific To
The DEIR

12. Figure 4-2, labeled "Earthquake Faults in SCAG Region," utilizes 1971 data. The DEIR should use the most recent USGS data, including all information from the January 17, 1994 Northridge earthquake.

13. Chapter 5 of the DEIR provides no description of air pollutants and quantities of pollutants typically emitted by landfills. This information is readily available and should be before the decisionmakers. The DEIR does not describe the impacts of proposed new landfills and expansions on the ability of the SCAGMD to meet air quality requirements in non-attainment zones. The DEIR should also describe health risks associated with these emissions.

14. Section 5-4 of the DEIR at p. 5-28 does not contain a discussion of water resources in the Santa Clarita Valley. The DEIR should include in this discussion the percentage of dependence on groundwater since it is higher than in other areas.

15. Section 5-5 of the DEIR should describe the existence of wildlife corridors and their biological importance.

16. Chapter 6 of the DEIR is inadequate in part because a description of regulations with which landfills must comply is not an analysis of mitigation measures.

David M. Smith
June 17, 1996
Page 6.

17. Chapter 6-1 states that the EIR "attempts to avoid discussion of [environmental] impacts which are speculative. Does the County consider discussion of air pollution, water pollution and biological impacts to be "speculative"?

18. Page 6-12 of the DEIR should state that landfills such as Elsmere and Sunshine Canyons are located in areas of high seismic activity. Recent seismic activity should be described, including uplift, acceleration, and landslides due to the 1994 Northridge Earthquake.

19. A recent CIWMB report stated that 72% of the landfills in California are leaking. The DEIR should discuss what contaminants are leaking from landfills, their proximity to drinking water, and potential health risks from these contaminants. The DEIR should also discuss expected life of the landfill liners. The cost and methods of groundwater clean-up should be disclosed.

20. Chapter 7 of the DEIR incorrectly states that there are no significant effects from the siting element. There are many impacts of the siting element which cannot be mitigated to a level of insignificance, including but not limited to air pollution and water pollution. This chapter is also inconsistent with statements made in Chapters 6 and 10, which describe significant irreversible impacts. Therefore, a statement of over-riding considerations must be made in order to approve the Siting Element.

21. Chapter 8 of the DEIR must present alternatives to landfills. It should explore alternate technologies on a county-wide basis to determine whether they will create less pollution than those presented in the siting plan. LASER is particularly interested in alternatives which would result in less actual or potential water pollution, such as baling, pyrolysis and gasification. Presenting alternatives is a requirement of CEQA.

22. Page 2-15 of the DEIR states that green waste may be used for daily cover. Does the DEIR evaluate the environmental impact of using green waste for daily cover? Is the Department aware that a court has overturned the CIWMB regulation which allowed green waste used for this purpose to be counted as recycled material for the purposes of AB 939? During the hearing on April 16, a Department representative stated that the County supports the use of green waste for daily cover. Why do the County and the Sanitation Districts promote policies that undercut recycling, such as the "counting as recycling green waste used as daily cover" policy? During the April 16 hearing a Department representative stated that diverting all green waste from landfills would not lead to an increase in composting.

David M. Smith
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Please identify the factual basis, if any, which supports this conclusion. Please identify any issues relating to the DEIR or the Siting Element where the Department has taken a position that was contrary to the interests of the landfilling industry. Please quantify the reduction in needed capacity which would be achieved through diverting green waste from landfills. The failure to quantify this reduction in potential capacity is a deficiency under CEQA. Please state why the Department is not promoting a policy of diverting green waste from landfills.

C.

General Comments

23. The Technical Appendices to the County Market Incentive Zones section states that the County does not intend to try for 50 percent diversion by the year 2000. Will the Department update this section to reflect AB 939 requirements? The section now is internally inconsistent because it does not comply with applicable state law.

24. During the April 4 hearing in Valencia a Department representative stated that recent closures of landfills are making it more difficult to obtain adequate disposal capacity. In preparing the Siting Element, did the Department consider the fact that these closures reflect the legitimate desire of the citizens of the County not to use landfills as a means of waste disposal, in view of the adverse environmental effects of landfills? In particular, why is the County advocating the expansion of the Lopez Canyon landfill, after concerned citizens from all over Los Angeles County with great effort succeeded in obtaining a firm date for the closure of that landfill? (The closure date is acknowledged in the Siting Element.) Is the County prepared to recognize the concerns of these citizens by taking proactive steps to encourage meaningful alternatives to landfills, instead of simply adopting the landfilling industry's wish list of landfill expansions? LASER and others have been expressing concerns about the adverse environmental effects of landfills for many years. If these concerns have made the landfill siting process difficult, hasn't the County had more than enough opportunity to reject and renounce landfills as a preferred method of waste disposal?

25. At several Siting Element hearings a Department representative stated that it is up to the private sector to implement alternatives to landfills. Please identify the private sector interests who are advocating landfilling in Blind, Towsley, Mission-Rustic-Sullivan, and Lopez Canyons. If no private sector interests have initiated proposals regarding these

David M. Smith
June 17, 1996
Page 8.

landfills, why is the County devoted its limited resources to supporting them as opposed to non-landfill alternatives?

26. During the April 4 hearing, several speakers pointed out that creating excess landfill capacity would lead to a reduction in the charges imposed by landfill operators to dispose of material in landfills, and that these cost reductions would reduce incentives to recycle. A Department representative claimed to be unaware that cheap landfill rates would reduce incentives to recycle. This relationship is based on common-sense economics and is in fact well documented. For example, the chief executive of a waste disposal company has stated that low landfill prices undermine the incentive to recycle. See Atch. "C" (printout from public library data base of article from the Financial Times). A waste analyst employed by the State of North Carolina has been quoted as saying that "[t]he lower the disposal cost, the less incentive there is to reduce and recycle." See Atch. "D" at p.2 (printout from public library data base of article from the Greensboro News & Record). The EIR is deficient because it does not disclose facts such as these which confirm that reduced landfill disposal costs reduce the incentive to recycle. Please state in the response to this comment (1) whether the Department was aware of these facts during the preparation of the Siting Element, and (2) all facts (such as economic studies) which the Department believe support its conclusion regarding whether there is (or is not) a relationship between cheap landfill rates and incentives to recycle. Is the County prepared to adopt a policy that would increase the incentives to recycle by reducing the capacity of landfills? Scenario B in the "time to crisis" table predicts substantial excess capacity. Doesn't excess capacity in fact negate the purpose of AB 939 by discouraging recycling in favor of waste generation?

27. Is the Department aware that the tipping fees at Puente Hills are substantially lower than the prevailing tipping fees statewide? Doesn't the competitive pressure from the resulting lower landfill disposal costs at Puente Hills drive down tipping fees at other landfills, thereby attracting waste from outside of the County? Why doesn't the County require higher tipping fees in order to preserve existing landfill capacity? If all of the proposed landfills are sited, a gross over-capacity of landfill space will exist, which will drive down the cost of landfilling to artificially low levels. The DEIR is deficient in that it does not address the growth-inducing impact of this over-capacity as required by CEQA.

28. During the April 4 hearing, a Department representative stated that if Blind Canyon, Rowsley Canyon, and Mission-Rustic-Sullivan Canyons were to become unavailable, the County would

David M. Smith
June 17, 1996
Page 9.

have to look at non-landfill alternatives. Does the Department agree that unless present circumstances change, these sites will remain unavailable for landfilling? Does the County have information that would support a conclusion that these sites will become available for landfilling within any time period that is relevant to the requirements of AB 939? If so, please identify the information. If the County has no such information, what specific non-landfill alternatives is it prepared to adopt?

29. During the April 4 hearing, a Department representative stated that current alternatives to landfills (such as waste-by-rail or the Bedminster process) suffer from higher costs in comparison to landfilling. In making this comparison, did the Department consider long-term landfill cleanup costs? If so, where are these long-term costs set forth in the Siting Element or DEIR? In evaluating the true costs of landfills, was the Department aware that as a result of a federal lawsuit several municipalities in Los Angeles County that deposited municipal solid waste at the Operating Industries landfill recently agreed to pay several million dollars to contribute toward the cost of cleaning up that site? See Atch "E" (printout from public library data base of article from Hazardous Waste Business). Did the Department consider the risk of similar litigation exposure with respect to other landfills in preparing the Siting Element or the Environmental Impact Report? The EIR is deficient because it does not disclose the true long-term costs of landfill cleanup.

30. In preparing estimates of landfill capacity, did the Department seek information from any source other than the landfill operators themselves? If not, why not? If so, please identify the sources that were consulted. Specifically, did the Department make requests from companies promoting alternatives to landfills? Were developing technologies considered? Did the Department attempt to analyze or quantify how much waste could be diverted from landfills through these technologies? The EIR is deficient because it does not include an evaluation of alternative waste disposal methods.

31. During several siting element hearings a Department representative stated that only landfills and incineration facilities would meet the requirements of the Siting Element. LASER believes that this represents an overly restrictive interpretation of AB939. Logically, all methods of disposal would add to the County's disposal capacity. The County does not consider or quantify several methods of disposal that would reduce landfill capacity needs, such as baling, gasification, or pyrolysis. This is an deficiency under CEQA.

David M. Smith
June 17, 1996
Page 10.

32. Please identify the names and addresses of all persons who received the Notice of Preparation for the Siting Element and DEIR.

33. Members of LASER (along with a representative of the Natural Resources Defense Counsel) met with Department representatives on April 23 to discuss alternatives to landfills and to correct misconceptions regarding waste disposal issues. Future meetings are scheduled. We are submitting these comments in the event that the meetings do not satisfactorily resolve the outstanding issues, because as stated above the Siting Element and DEIR in their present form are inadequate and must be rejected. (Comments are categorized under the three main headings set forth above for organizational purposes, so that, for example, portions of a comment appearing under the "Siting Element" heading may also be applicable to the DEIR.)

We appreciate the opportunity to comment on these important documents.

Sincerely,
Lynne Flambeck
Lynne Flambeck FAX

Encl.

TO :
FROM :

PHONE NO. '8184583593
JUN 17 1996 4:32PM P 1

3 pages

25

UPPER MANDERVILLE CANYON ASSOCIATION
P.O. Box 48845
Los Angeles, California 90048

June 17, 1996

Mr. David Smith
Los Angeles County Department of Public Works
Environmental Programs Division
P.O. Box 1460
Alhambra, CA 91802-1460

RE: Summary Plan of Los Angeles County Countywide Integrated Waste Management Plan (Preliminary Draft, Proposed Negative Declaration, Initial Study and Environmental Assessment, Technical Appendices) and Countywide Siting Element (Preliminary Draft, Draft Environmental Impact Report).

Dear Mr. Smith:

Upper Manderville Canyon Association represents about 270 homes situated between Mission Canyon and Rustic/Sullivan Canyons. We are extremely concerned about the continued presence of Mission/Rustic/Sullivan Canyons in the list of potential landfills for Los Angeles County to ensure adequate disposal capacity for the next 5 to 15 years.

If this document was a site-specific EIR, how could Mission/Rustic/Sullivan meet the siting criteria listed in Appendix 5 of the preliminary draft Countywide Siting Element (CSE) since:

1. The residents in near proximity to the site could not be protected, judging from existing problems with the Mission Canyon landfills,
2. Due to underlying faults which caused much damage after the Northridge earthquake of 1994 and to highly unstable soils, the structural stability and safety of the facilities could not be ensured,
3. According to the latest State Water Resources Report, all 8 Mission Canyon landfills are leaking into surface waters and groundwater (which may be affecting wells downstream of the existing landfills), so it seems problematic that surface waters and groundwater can be protected,
4. Rustic/Sullivan are in a Significant Ecological Area and, in combination with Mission Canyon, form the last wildlife linkage with the eastern Santa Monica Mountains, so they must be protected,
5. The conditions in Sepulveda Pass are hazardous now for garbage trucks, with gridlock conditions for hours every day that lead frequently to accidents and fires,
6. The social and economic goals of the community are to maintain property values and to promote the natural and recreational resources of Rustic/Sullivan /Mission which are a major factor in the economic development of our community?

Under CEQA, if the goals and policies of a draft EIR are site-specific, doesn't the draft EIR have to be site specific? To accomplish Goal 2.4.1 (page 2-2, CSE) the Policies include "The County and the County Sanitation Districts of Los Angeles County, The City of Los Angeles, and the County will coordinate efforts for the permitting and development of Mission/Rustic/Sullivan Canyons Landfill provided it is found to be environmentally sound and technically feasible - Similar site-specific policies are stated for Elanero Canyon,

UPPER MANDREVILLE CANYON ASSOCIATION

Towhee Canyon, Blind Canyon, expansions of Antelope Valley and Lancaster Landfills, Chiquita Canyon Landfill, Puerto Hills Landfill, Lopez Canyon Landfill and Sunnyside Canyon Landfill.

Why doesn't the CSE DEIR discuss or tabulate the suitability of not only Mission/Rustic/Sullivan, but the other 3 sites on the list (Table 6-1, page 6-13), as proposed new landfills sites using the siting criteria? If these criteria are not considered, why not?

Shouldn't this CSE include a probable time to permit any of these proposed new landfill sites? Won't permitting a new landfill site take more than 5 years, perhaps more than 15 years? Why should these new sites be included in a plan intended to ensure 5 to 15 years of landfill capacity?

Why doesn't the CSE DEIR tabulate the out-of-county landfill sites, including whether they are operating or will be operating in the next five years? State law requires the county to develop a strategy that may include a number of options, not just new in-county landfills. Isn't this CSE incomplete without a more thorough discussion of alternative strategies?

How can the CSE DEIR talk about "Significant Irreversible Changes" in Chapter 10-1 without doing site-specific discussions? In particular, isn't the second "irreversible environmental change" considering biological resources losses highly inaccurate since it does not address all possible losses to any or all of the potential landfill sites?

We ask that the CSE DEIR do site-specific EIRs or else provide for 5-15 years of landfill capacity through other strategies such as out-of-county landfills, transformation facilities that meet regulatory requirements for operation within the county, or stronger reduction strategies than those proposed in the Summary Plan (SP).

If the SP is totally separate from the CSE and is meant to be solely an administrative document or an overview, then a mitigated negative declaration could be considered, but, under CEQA, if there are any environmental impacts you cannot have a negative declaration. Why do you discuss environmental impacts and then call for a negative declaration?

If the SP contains no reference to the CSE (the note on page 1-5 seems to indicate otherwise) then the SP does not have to do an EIR. However, one of the SP goals (SP Table ES-1, Goal 6, page ES-13 and Goal 6, page 2-5) states: "Assure adequate long-term solid waste disposal capacity for the cities and County unincorporated areas." The stated policy for Goal 6 (SP page 2-5) says: "The County and the participating cities in Los Angeles County will support the development of new disposal facilities and expansion of existing facilities identified in the Los Angeles County Solid Waste Management Action Plan (LACSWMAP) adopted on April 5, 1988, by the County Board of Supervisors (as revised by the Countywide Siting Element), as long as they are found to be technically and environmentally feasible."

How can a document (the SP) containing another document (CSE DEIR) with an unapproved DEIR and acknowledged irreversible environmental impacts (Chapter 10, CSE DEIR) receive a negative declaration? Doesn't this SP Goal 6 have to be removed to keep the CSE and the SP separate?

Since the LACSWMAP EIR contained site-specific studies, if the CSE is to be a revision of the 1988 LACSWMAP, shouldn't it update those site-specific studies?

P 4

P4 Refer to Topical Response in Appendix ND-A.

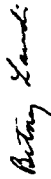
PHONE NO. 318-4583593

JU 7 1996 4:32PM P 2

UPPER MANDEVILLE CANYON ASSOCIATION

The SP contains informational programs to promote recycling, reduction and reuse. How are we going to meet the mandate of 50% reduction of our wastestream by the year 2000 if the County does not initiate more proactive programs and leadership? As residents threatened by the destruction of our surrounding natural resources, our air and our water, if we don't radically reduce our wastestream, we are extremely concerned that the County is not more actively encouraging new industries to locate in southern California, use our recyclables and enhance our economy. We feel landfill permitting procedures should be reviewed to see if landfill life can be extended by lowering the ceiling on permitted tons/day and by attempting to control the importation of trash from out-of-county to in-county landfills as long as the County refuses to consider out-of-county sites as part of our 5- to 15-year landfill capacity.

Sincerely,



Betty Lentis
Vice President, UMCA

June 17, 1996 Facsimile Communication

Los Angeles County Department of Public Works
Attention: David Smith
900 South Fremont Avenue
Alhambra, California 91803-1331

RECEIVED

JUN 18 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL SERVICES

To whom it may concern.

This letter is being submitted to comment on the Environmental Impact Report (EIR) for the Countywide Siting Element (CSI) and County Integrated Waste Management Plan (CIWMP).

Countywide Integrated Waste Management Plan

In general the goals, policies and objectives of the CIWMP give short shrift to the basics of economics in that the cost of landfilling is being kept far below the actual cost of disposal by the biggest landfill operator, the Sanitation Districts of Los Angeles County. This will continue to make any kind of source reduction or recycling more expensive than simply hauling it off and dumping it in a hole or canyon. The National Solid Waste Management Association (NSWMA) and the Solid Waste Association of North America (SWANA) in numerous publications point out that the cost for recovering recyclables using the most commonly used and cost effective methods is approximately 50-55 dollars per ton at its lowest. Therefore, as long as the county continues to subsidize the cost of solid waste disposal at 17 dollars a ton it will never be in the economic interest of businesses, public entities, or the general citizenry to recycle. The only thing that keeps the current MRFs in business is the labor and transportation cost savings and subsidies from cities to meet their recycling goals. The Sanitation Districts of Los Angeles County (San. Districts) have proposed a level pay plan where its proposed MRF would charge the same tip fee as the landfill. How does that encourage recycling? In a capitalist economy the cheapest price wins, if you lower the price they will come.

The CIWMP also ignores the responsibility to address the political obstacles to implementing any tangible actions. No member of the task force, or any political or government official is willing to raise rates for disposal to consumers or businesses. This is the third rail of trash politics. Therefore the CIWMP proposes, encourages, works with entities, trains, educates, assists, considers, investigates etc. but very few projects requiring capital investment or rate increases are proposed.

Although much of this is beyond the jurisdiction of the LA County Department of Public Works (DPW), there are actions which could be taken by the DPW unilaterally. This would put the DPW in the leadership role and be an example to the county communities to walk the walk of the DPW instead of just the talk. For example does the DPW use retreaded tires on its cars? No. They will claim they do on their heavy

duty vehicles but that has been always been true for all heavy duty vehicles since the 40's
What recycled procurement has the DPW committed to? Does it have a policy much
less a mandatory one for recycled procurement. How can the CIWMP propose that it
will encourage, educate etc. when it doesn't do it themselves? Does the DPW purchase
recycled oil, antifreeze or lubricants? Does the county have a program for the use of
alternative road products? If so how much has it used. This is not stated because it is a
small token amount. What are the accomplishments of the DPW that are examples to
the county communities?

The plan states that it will encourage mixed waste composting. Mixed waste composting
has been a questionable strategy in the U.S. and Europe. The product
quality-marketability is low and there are still unsolved problems with contamination,
odors, siting and process problems. Biosolids and green waste composting is the
predominant and fastest growing composting strategy in the U.S. and Europe. This
should be considered the most viable options but it is not proposed because it would
supplant the green waste ADC program.

The DPW and San. Districts were conspicuously absent from hearings before the
planning commission for the proposed yard waste and biosolids composting facility in
Lancaster. If they are in favor of composting why weren't they backing that project. Is it
because it would compete with them?

The reports repeatedly claim that the County LEAs enforce state and federal law.
Their roles and responsibilities are to enforce the law, that is correct. However they do
not enforce the law in any tangible way, shape or form. They do not issue fines, close
facilities or sanction their supposed charges in any way. West Covina LEA will make
history if it succeeds in closing BKK. Even this may be a pyrrhic victory since the
financial responsibility for closure may not be adequate forcing the state and city to foot
the bill for the mess that BKK made on the assumption that trash would be an eternal
sponge for the absorption of hazardous liquids. The LEAs are purely advisory or
ceremonial groups which hope to or make the appearance of inflicting discomfort on
operators and owners with paper cuts and brow beatings. I note as evidence the recent
NRDC lawsuit, which was won, which supported the fact that the CIWMB and LEAs
failed to enforce the law. I also cite as evidence the repeated unpermitted illegal vertical
and lateral expansions of Chiquita and Lopez Canyon Landfills with no consequence to
the operators. No matter how many sashes, medals and paper proclamations are
bestowed on the president of Chile, General Pinochet is still in charge. So it is with the
figurehead LEAs when the budget, staff and clout of the landfill operators are matched
against these puny staffed, barely funded agencies. History tells us who has won.

The reports should be corrected to reflect the status of Yard Waste ADC as not being
legitimate recycling. Although the court decision is under appeal the EIR must reflect
the current statements of the court and thus the current state of the law on this subject.
Yard waste ADC is not recycling. It is in fact, landfill disposal. The reports repeatedly
state in numerous locations that Green Waste ADC is considered recycling. If this is to
be corrected it should be stated by the authors that green waste is considered recycling

except by every other state of the union and except by the courts and rule of law in the State of California. Why do we have courts if their decisions are not to be accepted, even if they are under appeal. If reducing the volume of solid waste is recycling, all that needs to be done is to set up baliers and hammermills at landfills and shred and compress all the waste to 50% of its original volume to reach the recycling goals. Does that make sense? If ADC is recycling why can't the avoided use of dirt cover be counted as recycling when tarps or foam ADCs are used. Is using a tarp or foam for cover recycling? If not then why is Yard Waste ADC recycling?

The reports erroneously quote the current prices for recyclables at "all time highs". One only needs to read Recycling Times or other trades to know that prices were at all time highs but have since returned to their historic volatile behavior and prices have stabilized and been corrected. The price of recyclables should reflect current and historic levels and behavior. Recycling prices have always been volatile and anyone in the business knows this requires caution and should not be relied on if they plan on surviving.

Countywide Integrated Waste Management Plan Proposed Neg. Dec. & Env. Assessment

The Environmental Checklist form is incorrect. Because the CIWMP favors the continued emphasis on landfills, continued expansions of the existing landfills will be undertaken as a result of their sanction in this plan. Expansions would result in potentially significant impact from seismic ground shaking as evidence by tears in landfill liners at several landfills resulting from the Northridge earthquake. Landfill expansions have also resulted in landslides and mudflows as televised or otherwise documented failures of Chiquita, BKK, and Lopez Canyon attest. Landfill expansion and continued emphasis necessarily cause increased erosion, changes in topography, due to excavation and grading.

Landfills emphasis and expansion cause increased discharges to surface water. Such discharges affect the surface water quality such as temp., dissolved oxygen and turbidity, as well as the introduction of chemical contaminants from the landfill to surface water.

Landfills emphasis and expansion sanctioned and encouraged in the plan will cause impacts to groundwater quality due to the fact that many of the existing landfills quoted in the plan have already and continue to impact groundwater quality (i.e. BKK, Puente Hills, Calabasas, Azusa etc.)

The environmental assessment is also wrong in that violations of air quality standards have been and will continue to be violated by landfills because of the inaction of this plan to mitigate their use.

The CIWMP will also increase the amount of vehicle trips, traffic and vehicular air pollution that could have been avoided had it emphasized the use of MRF, recovery of the true cost of disposal and a fair market based pricing structure rather than a stalinistic price subsidies and controls.

P5

P5 Refer to Topical Response in Appendix ND-A.

The plan would also cause the use of non-renewable resources in a wasteful and inefficient manner.

The environmental checklist is incorrect when it claims it will make no significant impact on solid waste disposal. It will increase the amount of resources disposed of rather than recycled because it emphasizes landfilling as its priority rather than last in the hierarchy of solid waste management (source reduction/reuse, recycling, landfilling).

Landfill emphasis in the plan has caused and will increase the contamination of local and regional water supplies.

The aforementioned impacts are cumulatively considerable have the potential to degrade the quality of the environment and have the potential to cause substantial adverse effects on human beings both indirectly and directly contrary to the environmental analysis checklist.

Countywide Siting Element

On page 1-6 the element states that there are strict requirements for landfills by local, State and Federal agencies. This is tacitly untrue. The local agencies bow to the every whim of the San District and other public operators. No fines have ever been imposed or sanctions of any kind imposed. The recent NRDC lawsuit which was won showed that the LEAs failed to list any facilities for minimum standard violations. Inspectors for the state agencies have been badgered, pressured and threatened with demotions, salary sanctions and loss of their jobs for trying to do their jobs and enforcing the law. There is one person in the U.S. EPA responsible for RCRA subtitle D compliance for the entire state. California has the most lenient regulations begging subtitle D compliance. They allow contaminated stormwater and leachate to be used for dust control or to be discharged to surface waters. Few other states allow this. California allows local agencies a lower standard for financial responsibility putting private operators at a disadvantage and California has a near perfect record of complete lack of enforcement actions.

The siting element does not adequately address the avoidance of siting new landfills by diverting more waste to existing MRFs and giving support to new MRF development. This should be the goal of the siting element and is not included in the policies, goals or objectives. If the goals of 50% diversion were exceeded less capacity would be necessary and the time to crisis would dramatically increase.

Page 2-3 includes the expansion of Lopez Canyon. By recent agreement the City of L.A. has agreed to close this landfill. The Siting Element should be corrected to include the most recent data concerning this landfill.

Pages 2-6 and 2-7 states as goals the use of green waste as daily cover. A recent court decision disallowing the use of green waste ADC for diversion credits has been issued. This statement does not reflect the current judicial decision on the law.

The siting element should also not include for future planning purposes the continued operation of BKK. Under a settlement with the City of West Covina this facility will close next year. The element should be corrected to not include this facility.

Catalina Island is currently using open burning to dispose of their solid waste. Illegal activities such as this should not be cited as legitimate capacity.

The Adjustment methodology although sanctioned by the CIWMB is patently illegal and is not authorized by any statute. AB939 specified the base year and that the calculations should be based on 25% and 50% of the amount disposed of in the year it was passed.

The entire section on "Time to crisis" is completely hysterical in its characterization of an imminent crisis. The estimate of shortfall in 2010 at its greatest could be met by the permitting of two landfills and will probably result in a glut since most of the permits will be granted based on the false illusion of crisis. If Puente Hills and one other large capacity landfill are granted permits no crisis will ever appear. The result of past crises merely meant that permitted facilities would illegally expand vertically and laterally. Scenario B is correct is overly optimistic but at least half not all expansions and new sites will be accepted averting the illusory "crisis." In fact if it is calculated that only the expansions receive approval the time to crisis may completely disappear.

The continued citation of the State regulation of landfills as strict are indeed uproariously laughable. Recently, staff at the LA RWQCB concluded that Puente Hills landfill was leaking and impacting groundwater resources. The Board of the LARWQCB, packed with developers, anti-regulation, laissez-faire, anti-environmentalist zealots completely ignored the recommendations of the technical staff of environmental specialists, geologist and engineers on its own payroll.

The reintroduction of Blind, Mission-Rustic-Sullivan, and Towsley Canyons should not be considered. These sites have been explored before but rejected due to public outcry. The Siting Element takes great pains to cite how public participation and CEQA guidelines will be followed but ignore the fact that considerable environmental degradation would occur from these projects and public participation history caused the previous demise of these projects. The siting element should summarize the past history of previous proposals for use of these canyons as it briefly summarizes other landfill histories.

Lopez Canyon expansion should not be included unless the City of LA plans to renege on its decision to close the landfill as it has done twice before. Lopez is an example of the complete Keystone Cop behavior of local, state and absent federal regulation of landfills. Although illegal vertical and lateral expansions were noted the "strict" regulators were unable to sanction or stop this landfill from doing whatever it pleased. Lopez has had floods, landslides and gas emissions with no reaction from the state and local "strict" authorities. BKK is another case in point. Evacuations of nearby homes and landslides flooding adjacent properties failed to bring any action from the "strict"

environmental regulatory local or state authorities. In West Covina's latest battle the CIWMB actually took the side of the landfill and attempted to take away the permitting authority of the LEA which was actually trying to do its job!

Countywide Integrated Waste Management Plan Proposed New, Dec. & Env. Assessment

The current project description only outlines the operations of new and lined facilities. It does not describe the operations of unlined expanded facilities and their added environmental impact. Spadra, parts of Lopez, parts of BKK and other landfills are unlined without LCRS and have retrofitted LFG recovery systems that are not described and have significantly larger environmental impact to the air and groundwater resources. The land uses are also impacted since landfills commonly exceed their vertical and lateral boundaries without compunction. The EIR must note and mitigate these impacts since regulatory agencies continue to do nothing.

The section on typical disposal operations outlines the best available practices and puts out the impression that these practices are typical of landfill operations. This is a false impression. BKK discharges leachate into a fractured rock aquifer. Lopez Canyon still has problems with landfill gas emissions, recent modern landfill liners have been installed improperly (BENA, Kern County) and landfills have no permitted limits which are enforced. Those are but some of the typical operations of permitted landfill operations. Some statements in the operations are erroneous. Surface water control is usually instituted on a failure and patch basis. That is, modifications are only proposed after failure. No methods to prevent slope failure are usually proposed. Landfill gas is most commonly flared. No energy recovery takes place at most landfills in the County. Semitillation counters are only at the San. District landfills, this is not typical. The section on surface water and groundwater only address the fact that the RWQCB regulates them and makes no mention that groundwater is currently being impacted by several landfills in the county and surface water is discharged without proper oversight. To verify this one would only need to visit or call the RWQCB and ask how many landfill SWATs have received written review or ask how many reports of waste discharge have received written review. The answer may shock the caller. The RWQCB is so understaffed SWAT and WDRs are not reviewed or even discharge reports or analyses periodically checked. In most cases landfill contaminants are not even monitored or analyzed for. This is the standard operating practice for landfills not the rosy picture portrayed by the EIR.

The Closure and Post-Closure requirements are incredibly inaccurate. The county and cities do not even inspect all of its closed, illegal or abandoned facilities with any rigor. The Blanchard St. Landfill adjacent to the Long Beach FWY every winter spews forth rust-colored to black leachate next to the Long Beach FWY every winter yet nothing has ever been done. That is the accurate state of affairs concerning landfill closure.

I request a written response to my comments. Responses may be sent to the address below the signature line.

These comments are submitted on behalf of myself as a concerned citizen and on behalf of the Conservation Committee of the Angeles Chapter of the Sierra Club. These comments do not in any meaning, inference, or interpretation the opinions of my employer or clients.

Sincerely,



Andres Cano, Solid Waste Consultant
Conservation Committee, Angeles Chapter
Sierra Club
3345 Wilshire Blvd., Suite 508
Los Angeles, California 91803-1460

APPENDIX ND-D

**LETTER DATED MARCH 4, 1996 TO THE STATE
CLEARINGHOUSE**

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COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (818) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

March 4, 1996

IN REPLY PLEASE REFER TO FILE: EP-2

Mr. Lee Grisson, Director
Governor's Office of Planning and Research
State Clearinghouse
1400 10th Street, Room 121
Sacramento, CA 95814-5502

Attention Mr. Mark Goss

Dear Mr. Grisson:

**OFFICIAL REVIEW OF THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE LOS ANGELES COUNTY COUNTYWIDE SITING ELEMENT, AND THE PROPOSED
NEGATIVE DECLARATION FOR THE SUMMARY PLAN OF THE COUNTYWIDE
INTEGRATED WASTE MANAGEMENT PLAN**

As required by the California Environmental Quality Act (CEQA), enclosed is a copy of the Notice of Completion and Environmental Document Transmittal Forms and ten copies of the preliminary draft Los Angeles County Countywide Siting Element (Siting Element) and its Draft Environmental Impact Report (DEIR) dated January 1996 (SCH No. 95011048), and the Summary Plan of the Countywide Integrated Waste Management Plan (Summary Plan) and its Initial Study for a Proposed Negative Declaration dated January 1996.

As mandated by State law, the Siting Element addresses the solid waste disposal needs of all 88 cities in Los Angeles County, as well as the unincorporated communities in Los Angeles County, for a 15-year planning period (1996 through 2010). The document describes existing conditions, estimates future disposal needs, and makes recommendations on how to meet these needs on a Countywide basis. The Siting Element also identifies the areas for the location of potential new solid waste disposal facilities and potential expansion of existing solid waste disposal facilities in Los Angeles County. The document also establishes siting criteria for development of needed solid waste disposal facilities and formulates a Finding of Conformance process to determine consistency of proposed new solid waste disposal facilities and/or expansion of existing facilities with the Siting Element.

Mr. Lee Grisson
March 4, 1996
Page 2

The Summary Plan provides an overview of all the Elements of the Countywide solid waste management planning process, which includes the Source Reduction and Recycling Elements, Household Hazardous Waste Elements, and Nondisposal Facility Elements of the 88 cities in Los Angeles County and the County unincorporated areas. The Summary Plan includes Countywide goals, policies, and objectives for coordinating Countywide diversion programs, and marketing and disposal strategies. Based on a survey of all jurisdictions in Los Angeles County during summer 1995, the Draft Summary Plan lists existing diversion programs and identifies those programs which may be used by the County and/or the cities in Los Angeles County in achieving waste reduction mandates of AB 939.

The Draft EIR and proposed Negative Declaration were prepared to ensure that potential environmental impacts resulting from the approval and implementation of the Siting Element and the Summary Plan are properly addressed.

The listed environmental documents were prepared by the Los Angeles County Department of Public Works and are being submitted for a 45-day review and comment period pursuant to the provisions of the CEQA. Upon review of the comments received, the EIR for the Siting Element will be prepared, and a Negative Declaration may be issued for the Summary Plan. We request that you make the necessary distribution to the appropriate State agencies.

I hope that this information will enable you to expedite this most important review of the documents, and I earnestly solicit the cooperation from each of the appropriate State agencies in completing their review within the minimum possible time. Please direct your written response, not later than May 1, 1996, to:

Los Angeles County Department of Public Works
Environmental Programs Division
Attention: Mr. David M. Smith
P.O. Box 1460
Alhambra, CA 91802-1460

Additionally, please issue a State Clearinghouse No. for the proposed Negative Declaration for the Summary Plan as soon as possible.

Mr. Lee Grisson
March 4, 1996
Page 3

Should you have any questions regarding the above matter, please contact Mr. David M. Smith, of this office, at (818) 458-3561, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE
Director of Public Works



FRED M. RUBIN
Assistant Deputy Director
Environmental Programs Division

MA:mv
P:CSE.EIR\GRSN.SCH

Enc.

NOTICE OF COMPLETION AND ENVIRONMENTAL DOCUMENT TRANSMITTAL FORM

See NOTE below

SCH# 95011048

1. Project Title: Countywide Siting Element
2. Lead Agency: Los Angeles County Department of Public Works. Contact Person: David M. Smith
3a. Street/Address: 900 South Fremont Avenue 3b. City: Alhambra
3c. County: Los Angeles 3d. Zip: 91803 3e. Phone: (818) 458-3561

PROJECT LOCATION 4. County: Los Angeles 4a. City/Community: All cities in Los Angeles County
4b. Assessor's Parcel No. N/A 4c. Section Twp. Range
For Rural, Nearest
5a. Cross Streets: N/A 5b. Community:

6. Within 2 miles: a. Hwy # State Air- b. ports Rail- c. ways Water- d. ways

7. DOCUMENT TYPE
01. CEQA 06. NOE
02. Early Cons 07. NOC
03. Neg Dec 08. NOD
04. X Draft EIR 05.
Supplemental/
05. Subsequent EIR 06. Specific Plan
(Prior SCH No.:) 07. Community Plan
 08. Redevelopment
 NEPA 09. Rezone
09. NOI 11. Draft EIR
10. FONSI 12. EA
 OTHER
13. Joint Document 12. X Waste Mgmt Plan 10. OCS Related
14. Final Document 13. Cancel Ag Preserve 11. Other:
15. Other: 14. Other:

10. TOTAL ACRES: 11. TOTAL JOBS CREATED:

12. PROJECT ISSUES DISCUSSED IN DOCUMENT
01. X Aesthetic/Visual 08. X Flooding/Drainage 15. Septic Systems 23. X Water Quality
02. X Agricultural Land 09. X Geological/Seismic 16. Sewer Capacity 24. X Water Supply
03. X Air Quality 10. Jobs/Housing Balance 17. Social 25. X Wetland/Riparian
04. X Archaeological/Historical 11. Minerals 18. X Soil Erosion 26. X Wildlife
05. Coastal Zone 12. X Noise 19. X Solid Waste 27. X Growth Inducing
06. X Economic 13. X Public Services 20. Toxic/Hazardous 28. X Incompatible Land
07. X Fire Hazard 14. Schools 21. X Traffic/Circulation 29. X Cumulative Effects
30. Other:

13. FUNDING (approx) Federal \$ State \$ Total \$

14. PRESENT LAND USE AND ZONING: N/A

15. PROJECT DESCRIPTION: The Countywide Siting Element (CSE) addresses the solid waste disposal needs of all 88 cities in Los Angeles County, as well as the unincorporated communities in Los Angeles County, for a 15-year planning period (1996 through 2010). The document describes existing conditions, estimates future disposal needs, and makes recommendations on how to meet these needs on a Countywide basis. The Siting Element also identifies the areas for the location of potential new solid waste disposal facilities and potential expansion of existing solid waste disposal facilities in Los Angeles County. The document also establishes siting criteria for development of needed solid waste disposal facilities and formulates a Finding of Conformance process to determine consistency of proposed new solid waste disposal facilities and/or expansion of existing facilities with the Siting Element.

16. SIGNATURE OF LEAD AGENCY REPRESENTATIVE: [Signature] DATE: 2-27-96

NOTE: Clearinghouse will assign identification numbers for all new projects. I-f a SCH number already exists for a project (e.g. from a Notice of Preparation or previous draft document), please fill it in.

NOTICE OF COMPLETION AND ENVIRONMENTAL DOCUMENT TRANSMITTAL FORM

See NOTE below

SCH#

1. Project Title: Summary Plan of the Countywide Integrated Waste Management Plan
2. Lead Agency: Los Angeles County Department of Public Works. Contact Person: David M. Smith
3a. Street/Address: 900 South Fremont Avenue 3b. City: Alhambra
3c. County: Los Angeles 3d. Zip: 91803 3e. Phone: (818) 458-3561

PROJECT LOCATION 4. County: Los Angeles 4a. City/Community: All cities in Los Angeles County
4b. Assessor's Parcel No. N/A 4c. Section Twp. Range
For Rural, Nearest
5a. Cross Streets: N/A 5b. Community:

6. Within 2 miles: a. Hwy # b. Air-ports c. Rail-ways d. Water-ways

7. DOCUMENT TYPE 8. LOCAL ACTION TYPE 9. DEVELOPMENT TYPE
01. X NOE 06. NOE 01. General Plan Update 01. Residential: Units Acres
02. Early Cons 07. NOC 02. New Element 02. Office: Sq. Ft.
03. X Neg Dec 08. NOD 03. General Plan Amendment Acres Employees
04. Draft EIR 04. Master Plan 03. Shopping/Commercial: Sq. Ft.
05. Supplemental/ 04. Industrial: Sq. Ft.
Subsequent EIR Acres Employees
(Prior SCH No.: 07. Community Plan 05. Water Facilities: MGD
06. Transportation: Type
08. Redevelopment 09. Mining: Mineral
09. Rezone 08. Power: Type Watts
10. Land Division 09. Waste Treatment: Type
(Subdivision, Parcel
Map, Tract Map, etc.)
11. Use Permit
13. Joint Document 12. X Waste Mgmt Plan 10. OCS Related
14. Final Document 13. Cancel Ag Preserve 11. Other:
15. Other: 14. Other:

10. TOTAL ACRES: 11. TOTAL JOBS CREATED:

12. PROJECT ISSUES DISCUSSED IN DOCUMENT

01. Aesthetic/Visual 08. Flooding/Drainage 15. Septic Systems 23. Water Quality
02. Agricultural Land 09. Geological/Seismic 16. Sewer Capacity 24. Water Supply
03. Air Quality 10. Jobs/Housing Balance 17. Social 25. Wetland/Riparian
04. Archaeological/Historical 11. Minerals 18. Soil Erosion 26. Wildlife
05. Coastal Zone 12. Noise 19. Solid Waste 27. Growth Inducing
06. Economic 13. Public Services 20. Toxic/Hazardous 28. Incompatible Land use
07. Fire Hazard 14. Schools 21. Traffic/Circulation 29. Cumulative Effects
30. Other:

13. FUNDING (approx) Federal \$ State \$ Total \$

14. PRESENT LAND USE AND ZONING: N/A

15. PROJECT DESCRIPTION: The project is a Summary Plan consisting of an overview of all the Elements of the countywide solid waste management planning process which includes the Source Reduction and Recycling Elements, Household Hazardous Waste Elements, and Nondisposal Facility Elements of the 88 cities in Los Angeles County and the County unincorporated areas. The Summary Plan includes countywide goals, policies, and objectives for coordinating countywide diversion programs, marketing, and disposal strategies. Also, the Summary Plan will include proposed programs which the cities in Los Angeles County and the County have selected for implementation in order to achieve the above goals.

16. SIGNATURE OF LEAD AGENCY REPRESENTATIVE: [Signature] DATE: 3-22-93

NOTE: Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. from a Notice of Preparation or previous draft document) please fill it in.

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