



GAIL FARBER, CHAIR
MARGARET CLARK, VICE -CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountywimtf.org

July 23, 2014

Mr. Patrick Holland
Environmental Programs Division
County of Los Angeles Department of Public Works
900 South Fremont Avenue, 3rd Floor
Alhambra, CA 91803-1331

**COMMENTS ON THE INITIAL STUDY AND NOTICE OF PREPARATION
LOS ANGELES COUNTY COUNTYWIDE SITING ELEMENT REVISION**

Dear Mr. Holland:

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the Initial Study for the Los Angeles County Countywide Siting Element (Siting Element) Revision Project, which was released on June 16, 2014. Based on our review of the Initial Study, we have the following comments which need to be incorporated or considered during the preparation of the Draft Environmental Impact Report:

- Section 1.0 Project Description, 1.6 Description of the Project (page 1-5), 1st paragraph, line 12 – Insert the following after the “....Siting Element,” *“as determined by the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force,”*.
- Section 1.0 Project Description, 1.9 Environmental Setting (page 1-6), should include a more thorough description of the physical setting of the County. For example, the project description should include a thorough description of the major water resources or drainage areas, groundwater resources, various mountain ranges, and coastal plains.
- The use of the term “solid waste disposal facility” should be consistent throughout the document.

- Any references to the “Los Angeles County General Plan” should be revised to read: “Los Angeles County or host jurisdiction’s General Plan, as appropriate.”
- Any references to the “Los Angeles County Zoning Ordinance” should be revised to read: “Los Angeles County or host jurisdiction’s Zoning Ordinance, as appropriate.”
- Section 3.0 Environmental Analysis (page 3-1, 2nd paragraph), should be revised to read: “Any future landfill expansions or alternative technology facilities would be subject to future environmental review for each facility once project-specific details are better known.”
- Subsection 3.7 Greenhouse Gas Emissions (page 3-11, last paragraph), needs to be expanded to indicate that cities in Los Angeles County have also developed and adopted various policies and programs to ensure compliance with AB 32’s requirements.
- Any references to the “County’s adoption of the Siting Element Revision” should be revised to read: “County’s and cities’ adoption of the Siting Element Revision”.
- Any references to the “County’s Outdoor Lighting District Ordinance” should be revised to read: “County’s or host jurisdiction’s Outdoor Lighting District Ordinance, as appropriate”.
- Section 4.0 References (page 4-1), should be revised to read: “County of Los Angeles, *November 2012, Preliminary Draft of the Revised Los Angeles County Countywide Siting Element*”.
- Section 6.0 Appendix A – Siting Criteria, II. Use of the Siting Criteria (1st paragraph), should be revised to read: “The siting criteria presented here for the planning and evaluation of proposed *new and expansion* sites....” Additionally, the discussion needs to be expanded to indicate that in order to ensure compliance with the siting criteria, the proponent of new and expanded solid waste landfill and transformation, conversion technology, biomass conversion and engineered municipal solid waste facilities must obtain a Finding of Conformance from the Task Force.
- Section 7.0 Distribution List 6.2 Stakeholders (page 7-1) should be revised to include the name and address of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force.

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If you have any questions, please contact Mr. Mike Mohajer of the Task Force at MikeMohajer@yahoo.com or (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Mayor Pro-Tem, City of Rosemead

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cc: Department of Public Works (Director Gail Farber, Pat Proano, Carlos Ruiz, and Bahman Hajialiakbar)
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Facility Plan Review Subcommittee