

LOS ANGELES COUNTY



**COUNTYWIDE
SITING
ELEMENT**

**VOLUME II -
APPENDICES 1-A
THROUGH 1-D**

Los Angeles

County

Department of

Public Works

Environmental

Programs Division

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PREPARED BY GERSHMAN, BRICKNER, & BRATTON, INC. FOR THE
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TOPICAL RESPONSES TO PUBLIC COMMENTS

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APPENDIX 1-A

TOPICAL RESPONSES TO PUBLIC COMMENTS

1.1 INTRODUCTION

The purpose of this appendix is to present Topical Responses to issues raised by the public comments on the Preliminary Draft CSE dated January 1996, which can be categorized as general or of common concern.

The Los Angeles County Department of Public Works, under the auspices of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, is responsible for preparation of the CSE and its Environmental Impact Report (EIR). Preparation of the Preliminary Draft CSE and its Draft EIR was completed in early 1996. Subsequently, the documents were released on March 11, 1996, to cities, governmental agencies, neighboring counties, environmental organizations, and private industries for a 45-day comment period. To assure availability of the documents to residents, copies of the Preliminary Draft CSE and its Draft EIR were also delivered to more than 230 County and city libraries throughout Los Angeles County, as well as the Department of Public Works Headquarters and its field offices. Additionally, the Department conducted a series of 13 community information meetings throughout Los Angeles County between April 1, 1996, and April 22, 1996. Notices of the availability of the documents and the times and locations of the public information meetings were published in the Los Angeles Times and numerous local newspapers to maximize participation. These outreach efforts are documented in Volumes III, Appendices 1-E through 7-A, of the Final Draft CSE.

Due to the positive response by both the cities and the public, and to ensure maximum participation by all concerned, the comment period was subsequently extended twice for a total of more than 200 days, ending on October 17, 1996. Additionally, the Department worked with groups, such as the Natural Resources Defense Council and Landfill Alternatives Save Environmental Resources, to gain a greater insight into areas of the CSE that may be revised for greater clarity and to expand the document's information. All comments received, both at the public meetings and contained in letters received during the comment period, are presented herein Volumes II, Appendices 1-B through 1-D, with appropriate responses. The Final Draft CSE and its EIR incorporate the changes developed in response to the comments received.

1.2 TOPICAL RESPONSES

The Los Angeles County Department of Public Works reviewed all written and oral comments received on the content and adequacy of the Preliminary Draft CSE and determined that most of the comments received can be associated with a few main topics. These topics are discussed below under general issue categories identified as Topical Responses. These Topical Responses are used to provide response to comments or as reference to further discussions. However, responses are provided to all comments received on the Preliminary Draft CSE.

1.2.1 Topical Response #1: Purpose of the Project

Comments have been received asserting that the Preliminary Draft CSE does not fulfill the intent and specific requirements of AB 939. The commentators specifically state that

- the Preliminary Draft CSE fails to provide disposal strategies consistent with the hierarchy of AB 939, where landfilling is the least preferred option for providing for disposal capacity, and that diversion must be pursued first despite cost considerations;
- the Preliminary Draft CSE does not properly address the issue of how much waste cannot be source reduced, composted, or recycled; and
- the County incorrectly interprets AB 939 requirements to mean a landfill building program exclusively within the County's boundaries rather than pursuing integrated strategies to provide for 15 years of disposal capacity.

The California Integrated Waste Management Act of 1989 (AB 939, as amended) established an integrated system of solid waste management in the State, with a hierarchy of waste management practices to be promoted in the following order of priority: (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation/land disposal. AB 939 also mandated all jurisdictions in the State to achieve waste diversion goals of 25 percent by 1995 and 50 percent by the year 2000. AB 939 requires each city and county (for the unincorporated areas) to prepare a series of planning documents showing how the city/county intends to meet the waste diversion mandates. These documents specifically deal with the first two items in the waste management hierarchy, and include Source Reduction and Recycling Elements (SRREs), Household Hazardous Waste Elements (HHWEs), and Non-disposal Facility Elements (NDFEs). State regulations also require counties (not the cities) to prepare a Summary Plan that summarizes the contents of all the jurisdictions' SRREs, HHWEs, and NDFEs.

State law also recognized that any integrated system of waste management must include proper planning for the provision of adequate environmentally safe transformation/land disposal capacity, the third item in the waste management hierarchy. Consequently, each county is also mandated to prepare a countywide siting element that addresses the disposal capacity needs of all the cities and unincorporated areas within the county for a 15-year planning period. Consistent with these requirements of State law, the Preliminary Draft CSE deals with disposal issues only. The law did not intend the CSE to address issues that other planning documents have already addressed, including the SRREs, HHWEs, and NDFEs.

As clearly stated in the Executive Summary, Project Background, of the Preliminary Draft CSE, the CSE is intended to serve as a policy manual and not as a development program for specific sites and projects. The CSE establishes a planning mechanism that would facilitate the provision of a minimum of 15-years of disposal capacity on a continuous basis through landfills, transformation facilities, or any combination of these. This mechanism would be applicable to any present and future proposals to develop solid waste landfills and transformation facilities. This is the reason why the Draft EIR and CSE discuss, for example, the potential impacts of, and siting criteria to be applied to, any future transformation facility proposals although no new transformation facilities are currently being proposed.

State law requires the CSE to describe areas within the county that are potentially suitable for the development of land disposal/transformation facilities. It also states (Section 41703 of the California Public Resources Code) that "If the county determines that existing capacity will be exhausted within 15 years or additional capacity is desired and that there is no area available for the location of a new transformation or disposal facility" or the expansion of an existing facility "which is consistent with any applicable city or county general plan, the siting element shall include a specific strategy for the transformation or disposal of solid waste in excess of remaining capacity." An example of this type of strategy is the use of disposal facilities outside the county to handle the unmet disposal needs of the jurisdictions within the county. It is clear from the above discussion that a siting element must identify potentially suitable sites for the development of landfills/transformation facilities within the county to satisfy the 15-year disposal capacity requirement, unless the county has made a determination that there are no such sites within the county that is consistent with any applicable city or county general plan.

One must also note that potential sites for the development of transformation facilities need not be subjected to the same stringent standards (such as proximity to groundwater resources and active earthquake faults) that apply to landfills. There may exist many sites within Los Angeles County where transformation facilities may be properly zoned;

however, the determination of general plan consistency for a given site is often a complex undertaking which may only be made by the jurisdiction having local land use authority.

A major factor that must be considered in establishing solid waste management policies is that solid waste disposal is an essential public service that must be available to residents countywide without interruption. Therefore, policies that provide greater control over these services to better ensure their availability to residents countywide must take priority over those that provide a lesser degree of control. Out-of-county disposal capacity, because it entails higher overall transportation/disposal costs, higher susceptibility to transportation system failures, and a lower degree of control over the disposal system, is regarded as less desirable than in-county capacity. As such, adequate in-county disposal capacity should be pursued over out-of-County capacity, if environmentally and technically feasible sites are available within Los Angeles County. The Preliminary Draft CSE's policies that promote this goal are, therefore, not only consistent with the requirement of State law that the siting element identify potentially suitable in-County sites in existence, but are also the most prudent policies consistent with the responsibilities of Los Angeles County for the protection of public health and safety.

The issue of how much waste cannot be diverted (i.e., source reduced, recycled, or composted) is a complex one for which there is no single "right" answer, for the ability to divert solid waste depends on the resources society is willing, or able, to commit to this endeavor, and the degree to which people are willing to sacrifice their personal freedoms and convenience to help achieve the diversion goals. The issue is further complicated by the fact that while State law established a 50 percent diversion mandate by the year 2000, it did not address the feasibility of this or any other diversion rate. However, the law provides some guidance under Section 40052 of the PRC, where it states that the purpose of the law is "to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible *in an efficient and cost-effective manner* . . ." (emphasis added). Also, Section 40900 (d) of the PRC states "The Legislature further declares that it is the policy of the state and the intent of the Legislature to foster and encourage private solid waste enterprises."

While some commentators claim that 70 percent and higher diversion rates can be achieved, many studies have concluded that, realistically, the diversion rates ultimately achieved will probably fall below the 50 percent level. For example, a study conducted by J. Winston Porter, Ph.D. of the Waste Policy Center (from 1985 to 1989, Dr. Porter was the U.S. Environmental Protection Agency's Assistant Administrator for Solid Waste and Emergency Response), concluded that recycling goals in the 50 percent range are futile because about a quarter of all solid waste is inherently non-recyclable, the low value of many recyclable materials, and the low volume (each comprising less than 3 percent of the waste stream) of most of the material types. Recycling these "one-

percenters” could be done only at great cost and inconvenience. Also, while a few cities and States have set diversion goals as high as 70 percent, no major city in the country has been documented to have achieved 50 percent diversion.

The Preliminary Draft CSE, in Chapter 4, discusses several scenarios to estimate when Los Angeles County will experience a shortfall in permitted daily disposal capacity, considering various sets of assumptions regarding future conditions. In creating these scenarios to project the quantity of waste which cannot be source reduced, recycled, or composted, Countywide waste diversion rates of 25 percent in 1995 and 50 percent in 2000 were assumed achieved and maintained at the 50 percent level beyond 2000. Although Section 41780 of the PRC does not preclude a city or County from implementing waste diversion programs designed to exceed the State’s mandates of 25 percent in 1995 and 50 percent in 2000, the Law does not compel the city or county to achieve the higher goals in the event a city fails to meet the higher goal due to budgetary or other constraints. Also, it should be noted that the aggregate Countywide diversion rate proposed by the Source Reduction and Recycling Elements of all 88 cities and the County unincorporated areas is about 55 percent. This aggregate diversion rate of 55 percent represents the maximum diversion feasible countywide if every jurisdiction successfully implements all the programs identified in the individual SRREs as planned, including those jurisdictions that have voluntarily set diversion goals as high as 70 percent.

As demonstrated in the preceding discussion, the assumption that every jurisdiction in the County will meet the 50 percent diversion mandate by the year 2000 and maintain it through 2010 may be optimistic. As such, the Preliminary Draft CSE used the approach of planning for the standard requirement of the law (the 50 percent diversion rate) stipulated in Section 41780 of the California Public Resources Code.

It should be recognized that to achieve diversion rates as high as 50 or 70 percent, all of the following must occur:

- All jurisdictions must achieve extremely high participation rates from residents and businesses.
- All jurisdictions must have the ability to separate recyclable materials comprising an extremely high percentage of the waste stream, through either at-source separation or adequate materials recovery facility capacity.
- Adequate composting facility capacity must be developed to handle the needs of all jurisdictions in the County.

- Adequate processing capacity must be developed to turn recyclable materials into marketable products.
- Markets for recycled products must be found/developed.
- Ignoring all economic consequences.

It is likely that the present solid waste management system, which relies largely on economic incentives and market forces to obtain resident and business participation in diversion programs, may be unable to yield diversion rates as high as 70 percent. Should these goals be pursued nevertheless, the only way they may be achieved is through local government takeovers of some or all sectors of the solid waste industry, to implement programs or develop facilities which the free market would otherwise reject based on economics. This development would be clearly in conflict with the policy of the state and the intent of the Legislature to “foster and encourage private solid waste enterprises” as stated in Section 40900 (d) of the PRC.

1.2.2 Topical Response #2: Alternatives to Siting New Landfills and/or Expansion of Existing Landfills

Comments have been received asserting that the Preliminary Draft CSE does not consider alternatives to siting new landfills and/or expansion of existing landfills. The commentators specifically state that the Preliminary Draft CSE fails to emphasize the importance of measures to preserve existing disposal capacity. These measures include landfill mining, baling, biostabilization and shredding of waste, and use of alternative daily cover materials that save space in the landfill.

Measures such as landfill mining, baling, biostabilization and shredding of waste, and use of alternative daily foam covers conserve landfill volume and, therefore, extend landfill life. The beneficial impacts of implementing these measures at landfills depend on site specific conditions such as the type of landfill, type of waste stream, and efficiency of existing landfilling operations regarding compaction methods and density, recycling and material salvaging operations, and the use of alternative daily cover materials. The following are brief discussions regarding the potential application of these measures at in-County facilities. Additional information regarding these issues is included in Chapter 5 of the Final Draft CSE.

1.2.2.1 Baling

Baling solid waste before landfilling is a waste handling technique used in only a few facilities throughout the country which receive 500 to 3,000 tons per day of solid waste. Typically, these sites are not operated as canyon fills, but as shallow trench fills. Waste is fed into baling machines, then the bales are loaded onto flat bed trucks, unloaded and stacked at the working face, and finally covered.

Reported benefits include greater solid waste density, less dust and litter, reduced cover requirements, and slower decomposition rates. Densities typically achieved in mechanically baled waste range from 1,300 to 1,700 lbs. per cubic yard. In deep canyon fills, such as Puente Hills Landfill, the overburden of successive layers of solid waste results in similar in-place densities for much of the fill. Only the uppermost lifts at these landfills may benefit from mechanical baling prior to disposal. Since most major landfills in Los Angeles County are canyon fills, the density benefits afforded through implementation of baling prior to landfilling may be limited. Due to the comprehensive control programs currently employed, baling would not be expected to result in substantial improvements over existing dust and litter control measures. Although decomposition of baled waste may be slower than that of unbaled waste, baling would not alter the inherent composition of the waste and thus, the potential for gas and leachate production over time would not be less than for unbaled waste.

In evaluating the feasibility of using baling operations at landfills in Los Angeles County, it is important to note that most of the major metropolitan landfills are deep canyon fills, and while baling technology may be an appealing way to make space for more solid waste, it has not been demonstrated to be technically and environmentally feasible on a large scale in an urban setting. Also, additional land requirements and high costs compared to conventional methods may hinder its widespread acceptance and use at landfills in Los Angeles County. Furthermore, certain materials such as solid fill or demolition wastes cannot be baled.

The Final Draft CSE has been revised to include a goal and policy (Section 2.4.5) which will require, when appropriate, Class III landfill operators to use the balefilling process if it results in landfill space savings and when economically feasible. Further information on balefilling can be found in Section 5.4.4 of the Final Draft CSE.

1.2.2.2 The Use of Alternative Daily Cover Materials

Commentators recommend the use of tarps (geosynthetic blankets), chemical, and/or foam compounds as daily cover at landfills to reduce the amount of soil currently being used for cover purposes. It is stated that the use of tarps, foam, or other types of alternative daily cover materials (ADCMs), provides the same benefits as soil in reducing odors, vectors, and litter by covering the waste as it is disposed at the landfill face but

consuming less volume than soil. Therefore, disposal capacity is conserved and the life of the landfill is extended. Commentators state that landfill capacity can be increased by 22 percent by using ADCMs and indicated preference for foam compounds as an ADCM.

First, it should be noted that most major landfills in Los Angeles County are already using some form of ADCM, either green waste or geosynthetic blankets to provide the same capacity-conserving benefits as foam. The Antelope Valley, Lancaster, Savage Canyon, and Bradley Landfills already use geosynthetic blankets to provide daily cover to the working face of their landfills. Also, the Calabasas, Puente Hills, Scholl Canyon, and Spadra Landfills have been approved to use green waste as alternative daily cover (ADC) for several years, and Lancaster Landfill has recently completed their ADC demonstration project. Green waste ADC provides a beneficial use of green waste that would otherwise be disposed in the landfill. The use of green waste in this manner also contributes to the establishment of the collection infrastructure needed in place for the development of composting facilities. The replacement of green waste with the use of foam as daily cover may cause additional disposal if adequate composting capacity is not available.

The California Integrated Waste Management Board, through the Local Enforcement Agencies, has the sole authority to approve the use of any form of ADCM (i.e., green waste, foam, or geosynthetic blanket) which is granted (or denied) on a case-by-case basis. Currently, the only form of daily cover statutory authorized by the California Integrated Waste Management Board is soil. The performance criteria for ADCMs, as required by Subtitle D, are contained in the Code of Federal Regulations, CFR 40, and in regulations adopted by the California Integrated Waste Management Board. The regulations do not specify ADCMs, instead they establish the performance criteria for soil substitutes.

The Final Draft CSE has been revised to include a goal and policy (Section 2.4.5) which will encourage Class III landfill operators to use ADCMs when technically and economically feasible. Further information on ADCMs can be found in Section 5.4.1 of the Final Draft CSE.

1.2.2.3 Biostabilization and Leachate Recirculation

Commentators claim that disposal capacity can be increased by 50 percent to 100 percent through methods such as leachate recirculation and biostabilization, or the promotion of waste decomposition in landfills. Shredding waste and recirculating leachate inside the landfill achieves biostabilization which results in the breakdown of organic material, increased landfill gas generation, and volume reduction.

Modern landfills are designed to, among other things, minimize adverse environmental impacts on water and air resources. To achieve this goal, landfills incorporate into their design composite liner systems, leachate collection and removal systems, landfill gas control and monitoring systems, and an effective drainage/storm water management system. Leachate production is strongly discouraged in landfills as exemplified by most landfills that employ comprehensive environmental controls, including landfill gas condensate collection, prohibition of liquids disposal, interception of surface water run-on, and the use of cover material to control infiltration. These controls are employed to reduce the production of leachate and landfill gas at the Landfill. Since these methods may increase gas and leachate generation, the potential for adverse impacts on air and water resources would also increase. Therefore, it is unknown whether these methods will be accepted for general use at landfills in Los Angeles County.

The Final Draft CSE has been revised to include discussions on alternative solid waste disposal technologies. Further information on leachate recirculation and biostabilization can be found in Section 5.4.2 of the Final Draft CSE.

1.2.2.4 Landfill Mining/Reclamation

Landfill mining is the excavation and mechanical processing of previously landfilled materials or landfill airspace, to reduce the size of a landfill, to recover airspace at operating landfills, to recover recyclable materials, or to transfer material from an unlined to a lined landfill. It is a management technology that employs conventional surface mining techniques to dig up and sort buried waste materials. However, the feasibility of mining/reclamation is site specific, depending upon local technical, economic, and regulatory factors.

One of the earliest applications of landfill mining was the mining project conducted by the Collier County (Florida) Solid Waste Management Department at the Naples Landfill. The mined area contained solid waste that had been landfilled for 10 to 15 years. Between 1986 and 1992, the County mined more than 70,000 tons of solid waste and cover materials, averaging 40 to 80 tons per hour during processing. Since Collier's application of the technology, few other domestic and international communities have applied the concept, partially because the landfill mining technology is new and solid waste planners rely on a well-established body of experience (United States Environmental Protection Agency, EPA/600/R-93/163, September 1993).

This technology needs further evaluation as to its suitability in Los Angeles County due to costs, air quality, and other environmental concerns. The Final Draft CSE has been revised to include discussions on alternative solid waste disposal technologies. Further information on landfill mining technology can be found in Section 5.4.3 of the Final Draft CSE.

1.2.3 Topical Response #3: Exportation/Importation of Solid Waste

Comments have been received asserting that the Preliminary Draft CSE ignores or downplays disposal of Los Angeles County's generated waste already taking place in adjacent counties. Specifically, the commentators state that the Preliminary Draft CSE did not discuss policies or consider measures to export waste for disposal in adjacent counties and ignores disposal already taking place in adjacent counties. Furthermore, some commentators state that the imposition of restrictions or ban on waste originating from outside Los Angeles County may extend the life of in-County landfills and increase the disposal capacity available to the jurisdictions in Los Angeles County.

1.2.3.1 Disposal Trends

The Preliminary Draft CSE was prepared using 1995 baseline data. An analysis of recent import/export trends for the years 1994, 1995, and the first half of 1996, shows a trend toward increasing imports over exports, with imports reaching nearly 3,000 tons per day, six days per week (tpd-6), for the second quarter of 1996. However, changes have occurred in the regional solid waste disposal patterns since the closure of Lopez Canyon Landfill in July 1996, the closure of BKK Landfill in September 1996, and the October 1996 prohibition on disposal of non-inert solid waste at the Azusa Land Reclamation Landfill. Although no final disposal data will be available until early 1997 to assess the extent of the changes in the regional disposal system, it is likely that they will result in fewer waste imports and higher waste exports to out-of-Los Angeles County disposal facilities.

The Final Draft CSE has been revised to expand discussions on solid waste disposal import/export trends. Furthermore, additional scenarios are now included in the Final Draft CSE which considered net exports of 6,000 tons per day (six-day week), assuming the allocation of all of Orange County's available import capacity to waste originating in Los Angeles County by the year 2004. Further information on landfill disposal capacity shortfall scenarios can be found in Section 4.5.2.4 of the Final Draft CSE. However, it should be noted that 1) other counties may also utilize Orange County's available capacity, and 2) it is cost that ultimately determines where jurisdictions, businesses, or residents' decide to dispose of their solid waste.

1.2.3.2 Restriction/Ban on the Importation of Solid Waste

Solid waste collection, recycling, and disposal services in Los Angeles County operate under a complex system that includes public, private, and public/private joint venture operations. This regional solid waste management system, over the last four decades, has provided a cost-effective waste management system for Los Angeles County's residents and businesses, through a balance between the public and private sector operations. This regional solid waste management system is complex because of the many jurisdictions

and the public/private free market system that exist. In this system, the haulers determine where they will take the waste for disposal. Each day, more than 200 haulers determine where to take the waste, with availability of disposal facilities and economics being the determining factor.

As such, there is very little direct control on the flow of the waste stream in the 88 cities in Los Angeles County and the County unincorporated area. Additionally, County government does not have any control over the flow of waste generated in the cities. Solid waste is a commodity and therefore under the commerce clause of the U.S. Constitution, a local government is prohibited/restricted from adopting rules and regulations which inhibit/restrict free movement of commodities across jurisdictional boundaries. Recent Court decisions have restricted the authority of local jurisdictions to pass ordinances regulating the flow of wastes within their boundary (for example, the *C & A Carbone, Inc. v. Town of Clarkstown* Supreme Court case of 1994). The Court ruled that flow control generally violates the Commerce Clause of the U.S. Constitution by inhibiting the free trade of goods between states. A jurisdiction cannot impede the flow of interstate commerce. The imposition of restrictions on the acceptance of out-of-County waste by private in-County disposal facility operators, would have the potential to prevent a waste hauler from a state, such as Arizona, from freely contracting the services of in-County disposal facilities. Therefore, it is likely that such measure would be ruled unconstitutional.

The limited number of sites in Los Angeles County available for development of new landfills and the increasing difficulty to expand existing facilities require that Los Angeles County jurisdictions rely more on disposal capacity outside the County as in-County capacity is exhausted. A restriction of waste from outside Los Angeles County may incite other counties to impose similar restrictions on waste originating in Los Angeles County. This issue is further discussed in Chapter 9 of the Final Draft CSE.

1.2.4 Topical Response #4: Prohibition of Inert Waste and Sewage Sludge Disposal at Class III Landfills

Comments have been received asserting that the Preliminary Draft CSE does not include policies or measures which prohibit the disposal of inert waste materials and sewage sludge/biosolids at Class III solid waste landfills. The commentators recommend the adoption of bans on the disposal of inert materials and biosolids at Class III landfills. It is stated that these measures, if implemented, will conserve the existing remaining disposal capacity at Class III landfills. The commentators further stated that these actions will result in a net reduction of 6 percent in landfill disposal need and an extension of two years in the time when a daily disposal capacity shortfall will occur.

Exclusion of Inert Waste From Class III Solid Waste Landfills

Since 1990, the quantity of inert waste disposed at Class III landfills has decreased significantly. Based on surveys of landfill operators as of 1996, less than 1 percent or 400 tpd of inert waste is disposed at Class III landfills. The decrease in inert waste landfilled can be attributed to the following reasons:

- a) Most inert waste is currently being disposed of in unclassified landfills due to significantly lower tipping fees. Unclassified landfills have the capacity to absorb all the diverted inert waste.
- b) Inert waste is a targeted material for recycling and/or diversion programs by a majority of the cities in Los Angeles County and in the County unincorporated areas. These jurisdictions consider inert waste diversion as a method of conserving Class III landfill capacity and, therefore contain programs which discourage or prohibit disposal of inert waste there, unless the waste is needed for the operation and/or maintenance of the landfill. The Los Angeles County Source Reduction and Recycling Element targeted inert materials for recycling and/or diversion.

Additionally, nearly all the major landfills have established material recovery facilities which target, among other things, inert waste materials for recycling and/or diversion.

- c) Practically all of the inert waste currently received at Class III landfills is recycled; used to satisfy daily cover requirements; or used for other purposes such as access road maintenance. Under State law, materials used to satisfy cover requirements is not considered disposal.

At best, exclusion of inert waste from Class III landfills would be effective only as a stopgap measure. The prohibition of inert waste at Class III landfills would have an insignificant effect on the County's disposal capacity or increase in the life of existing disposal sites. Such an exclusion would not significantly solve the County's solid waste management problems.

Exclusion of Biosolids (sewage sludge) from Class III Solid Waste Landfills

In 1995, Los Angeles County residents generated an average of approximately 2,400 wet tons per day (wtpd) of biosolids (treated sewage sludge). Of this amount, 15 percent is managed on-site at various wastewater treatment facilities for purposes such as energy recovery and composting. Approximately 26 percent, or 620 wtpd, is managed off-site at in-County landfills for landfill co-disposal/energy recovery. The remaining 59 percent is shipped off-site to locations generally outside Los Angeles County for composting and land applications to grow crops such as Sudan hay, alfalfa, barley, wheat, and cotton.

There are alternative disposal technologies in developmental stages capable of using all the biosolids currently being landfilled in Los Angeles County. For example, Biosolids Injection Technology (BIT) is an innovation in cement kiln NO_x control. The Cement Industry Environmental Consortium (CIEC) innovated BIT to develop new and innovative NO_x control technologies which might be used to meet future California NO_x emission limitations. The basic principle of BIT is to utilize the natural occurring ammonia content of dewatered biosolids, which are generated at wastewater treatment plants, as a reagent to effect selective non-catalytic reduction (SNCR) of NO_x. Dewatered biosolids are injected into the kiln system at a location where SNCR reaction is favorable. It appears that preheater/precalciner kiln designs are best suited for BIT application.

BIT development has progressed through initial feasibility study and two phases of demonstration testing. Phase I demonstration testing was completed in 1994 and was designed to prove the concepts and principles on which BIT is based. Phase II testing began in early 1995 and is still underway. All demonstration testing was performed at Mitsubishi Cement Corporation's Cushenberry plant in Lucerne Valley, California. Based on favorable results generated thus far, the CIEC has filed BIT patent applications.

Annually, the Mitsubishi Cement Corporation's Cushenberry plant can consume about 155,000 tons of biosolids/sewage sludge, equivalent to 10 percent of the annual wastewater sludge generated by Southern California's sewage treatment plants. When fully operational, it is expected that the plant can use all the biosolids currently being landfilled in Los Angeles County. It could guarantee delivery of dry biosolids.

As various alternative disposal technologies are explored and/or patented, the exclusion of biosolids from Class III landfills would be effective only as a stopgap measure. It would not affect the County's disposal capacity or increase the life of existing disposal sites. Such an exclusion would not significantly solve the County's solid waste management problems.

1.2.5 Topical Response #5: In-County Versus Out-of-County Disposal Capacity

Comments have been received asserting that the Preliminary Draft CSE is misdirected to require 15 years of disposal capacity which must be built exclusively inside the County line rather than pursuing an integrated strategy to provide for disposal capacity. The commentators further state that recent court decisions have ruled local ordinances requiring in-County disposal to be "unconstitutional," and that the County's "self-imposed requirement" of 50 years in-County disposal capacity may have a "serious legal flaw."

The Preliminary Draft CSE states, in Chapters 4 and 8, that it is the goal of the cities in Los Angeles County and the County to secure adequate in-County disposal capacity to serve the needs of Los Angeles County residents and protect public health and safety. It also states that jurisdictions in the County can benefit from utilization of out-of-County facilities as a means to supplement and extend the life of in-County facilities. The Preliminary Draft CSE presents an extensive discussion of out-of-County landfills that may be available for use by local jurisdictions and the needed in-County infrastructure to provide access to these facilities.

Contrary to the commentators' perception, the Preliminary Draft CSE does not "require" that Los Angeles County develop 15 years of disposal capacity exclusively within the county. The CSE establishes a planning mechanism (not a landfill building program) which would facilitate the provision of a minimum of 15-years of disposal capacity on a continuous basis through landfills, transformation facilities, or any combination of these. This mechanism would be applicable to any present and future proposals to develop solid waste landfills and transformation facilities within the County.

The Preliminary Draft CSE responds to the requirement of State law and regulations that each county plan for the management of the solid waste generated within its boundaries. Los Angeles County is not required to plan for the management of other counties' waste, nor are other counties required to plan for the management of the waste generated within Los Angeles County. Because of this responsibility of each county to plan for its own residents' needs, counties may use any legally available method to protect their disposal capacity if they determine that its rapid depletion is not in their best interests. This may be done through outright bans on imported waste, strict restrictions on the quantities allowed to be imported for disposal, or imposition of heavy surcharges on waste imports (it should be noted that these types of restrictions may be limited to county-owned facilities only due to recent Supreme Court decisions regarding flow control). Out-of-County disposal (particularly, but not limited to, rail-haul) is also more susceptible to transportation system failures due to natural or man-made disasters. For these reasons, out-of-County disposal capacity is deemed inferior to in-County capacity in its ability to guarantee that solid waste disposal services are available to in-County residents and businesses without interruption.

Also, research and experience clearly shows that environmentally safe in-County disposal capacity is superior to out-of-County capacity based on economics. Studies have shown that Los Angeles County residents and businesses enjoy efficient waste management services and lower disposal costs than comparable services in other metropolitan areas of the country. Existing policies that promote in-County disposal capacity have been successful in providing Los Angeles County residents and businesses with an effective waste management service at a reasonable cost. However, dependence on out-of-County disposal capacity may result in substantial increases in the cost of disposal.

The preceding discussion has demonstrated that in-County disposal capacity is superior to out-of-County capacity for many reasons. Therefore, it follows that it is in the best interest of Los Angeles County to promote policies that place higher priority on developing in-County disposal capacity (provided suitable sites may be available), while **simultaneously** working to develop the necessary infrastructure to provide access to out-of-County disposal facilities. The commentators misinterpreted the Preliminary Draft CSE's stated preference for in-County disposal capacity to mean a mandate for control of waste market flow and a landfill building program exclusively within the boundaries of the County. There are no statements in either the Preliminary or Final Drafts of the CSE which support this perception.

Because waste is considered a commodity, flow control, in general, may be violating the Commerce Clause of the U.S. Constitution which protects free movement of goods across jurisdictional boundaries. The exception is that a facility owner/operator may establish restrictions on the origin of the waste, but only at those facilities that they own. This is consistent with the U.S. Supreme Court ruling in the case of *C&A Carbone, Inc., et al., v. the Town of Clarkstown, New York*, in May 1994. The Town's Flow Control Ordinance required all solid waste collected within the town limits to be sent to the Town's newly-constructed transfer station. The Court ruled that the Flow Control Ordinance deprived out-of-state firms access to the Town's market of recyclables and, therefore, violated the Commerce Clause of the U.S. Constitution by discriminating against interstate commerce.

These issues are further discussed in Chapters 4 and 9 of the Final Draft CSE.

1.2.6 Topical Response #6: Opposition to Proposed New or Expansion of Existing Landfills

Comments have been received asserting that the Preliminary Draft CSE advocates an unprecedented expansion of disposal capacity within County boundaries, but does not show credible strategies for achieving it, since all proposed new and/or expansion of existing landfills face "insurmountable" physical and political obstacles and oppositions from host communities and/or adjacent cities, and that the assumption should be made that 'new landfills in the County are unlikely and plan accordingly'. Specifically, the commentators cited opposition to the use of one or more of the following sites identified in Table 7-1 of the Preliminary Draft CSE as potential new landfills and/or expansions of existing landfill facilities: Blind Canyon, Elsmere Canyon, Mission/Rustic-Sullivan Canyons, Towsley Canyon, Chiquita Canyon, Lancaster, Lopez Canyon, Puente Hills, and Sunshine Canyon.

Contrary to the commentators' description of the intent of the Preliminary Draft CSE, this planning document is intended to serve only as a policy manual, rather than a specific development program. The Preliminary Draft CSE states in Chapters 4 and 8

that it is the goal of the cities in Los Angeles County and the County to secure adequate in-County disposal capacity to serve the needs of Los Angeles County residents and protect public health and safety. It also states that jurisdictions in the County can benefit from utilization of out-of-County facilities as a means to supplement and extend the life of in-County facilities. To achieve the disposal capacity objectives, the CSE establishes a planning mechanism, not a landfill building program, which would facilitate the provision of a minimum of 15 years of disposal capacity on a continuous basis through landfills, transformation facilities, or any combination of these. This planning mechanism includes the determination of future disposal needs, identification of potentially suitable sites, establishment of siting criteria each site must meet, and providing assistance/support to project proponents through the permitting process.

State law requires the CSE to identify potentially suitable sites for the development of landfills/transformation facilities within the County to satisfy the 15-year disposal capacity requirement, unless the County has made a determination that there are no such sites within the County which are consistent with any applicable city or county general plan. State law (Section 41710 of the Public Resources Code) further provides that a County may "Tentatively Reserve" a site within the County even though the site is not consistent with any applicable city or county general plan. The sites listed in the Preliminary Draft CSE are incorporated in response to these requirements of the law. It is up to public, private, and public/private interested parties to come up with specific development proposals for these sites. The Preliminary Draft CSE also recognizes that because of the strong opposition and inevitable delays that any proposed new facility or expansion of an existing facility (whether it is a landfill or transformation facility) will encounter during the permitting process, the process of planning for the capacity needed within seven to twelve years must begin now. Failure to plan would constitute an abdication of the County's responsibility to protect public health and safety by ensuring solid waste disposal services are provided to residents and businesses without interruption.

The following are comments and responses specific to the various sites listed:

Remove Mission/Rustic-Sullivan Canyons from the Preliminary Draft CSE?

These Canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area, which is a unit of the National Park System (Public Law 95-625). Current Federal law (Public Law 98-506) prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Remove Lopez Canyon expansion from the Preliminary Draft CSE?

This site has been deleted from further consideration as a potential landfill expansion in the Final Draft CSE.

Remove all Expansions from the Preliminary Draft CSE?

The CSE identifies proposed landfill expansions in response to the requirements of State law. Expansion of these sites, if they are found to be environmentally safe and technically feasible, will assist jurisdictions in Los Angeles County in addressing their disposal needs for the next 15 years. Because of their current operation, these sites generally experience fewer difficulties with regard to consistency with the local jurisdiction's general plan. Ultimately, the determination of consistency rests on the local governing body having jurisdiction over local land use. Expansions of existing landfills have the advantage of an existing transportation infrastructure and less significant potential environmental impacts compared to new landfills.

Remove Blind Canyon from the Preliminary Draft CSE?

This Canyon continues to be among the highest ranking sites for the potential development of new landfills in Los Angeles County. The CSE identifies this site for planning purposes only, and is in no way a guarantee that a landfill will be built at this location. The project proponent must come forward with a concrete proposal, acquire the properties, and submit a request for a land use permit to begin the permitting process, which includes demonstrating the technical and environmental feasibility of the site. To demonstrate this feasibility, each site must undergo rigorous geological and hydrogeological studies; air, water quality, seismic studies, etc. as a part of its environmental assessment review. The site must also comply with stringent permitting requirements of Federal, State and local agencies.

Remove Elsmere Canyon from the Preliminary Draft CSE?

The Draft EIR/EIS (State Clearinghouse No. 89032935) was released for public review in January 1995. The public review period for the project's EIR/EIS ended on August 4, 1995, and subsequently the Final EIR/EIS was prepared. However, the document was not released due to the enactment of the Omnibus Parks and Public Lands Management Act of 1996 (Public Law 104-333, Section 812). This Act prohibits the transfer of any Angeles National Forest lands for use as a solid waste landfill.

As a result, Browning-Ferris Industries (BFI), the current project proponent, is no longer considering the use of the areas within the Angeles National Forest. The scaled-down project would provide for a solid waste disposal capacity of 80 million tons, all within the privately held portion of the Elsmere Canyon site.

Remove Towsley Canyon from the Preliminary Draft CSE?

This site has been removed from further consideration as a potential new landfill site and is not included in the Final Draft CSE

1.2.7 Topical Response #7: Extension of Public Review Period

Comments have been received requesting that the public review period for the Preliminary Draft CSE and Draft EIR be extended to allow sufficient time for those agencies or individuals unable to complete their review within the required 45-day review period.

In accordance with the California Environmental Quality Act (Public Resources Code Section 21000 et seq.), the Los Angeles County Department of Public Works (DPW), acting as the lead agency, circulated the Preliminary Draft CSE and Draft EIR for a 45-day review and comment period effective March 11, 1996.

Prior to the effective date of the official review period, copies of the Preliminary Draft CSE and Draft EIR were distributed to interested parties, the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, all 88 cities in the County, special districts, State agencies, and environmental groups. The DPW also provided copies of the Preliminary Draft CSE and Draft EIR to public libraries throughout the County, and made them available at DPW's Headquarters Building as well as DPW's Building and Safety District offices throughout the County. Additionally, public information meetings were scheduled throughout the County to solicit written and/or oral comments on these documents.

The official public review and comment period ended on May 1, 1996. However, due to public requests, the review and comment period was extended for 45 days ending June 17, 1996. Subsequently, the public review and comment period was further extended for an additional 120 days ending October 17, 1996.

The 210-day review and comment period has been completed, and the Department has evaluated all of the comments received, and has prepared the Final Draft CSE and Final EIR. The Final Draft CSE will be submitted to the cities in Los Angeles County for a 90-day approval period. Upon receiving approval by a majority of the cities containing a majority of the incorporated population in Los Angeles County, the Final Draft CSE must be adopted by the County Board of Supervisors prior to their submittal to the California Integrated Waste Management Board for approval.

1.2.8 Topical Response #8: Specific Environmental Concerns

Comments have been received asserting that the Draft EIR was not prepared in accordance with the California Environmental Quality Act (CEQA) Procedures and Guidelines, and failed to discuss the environmental impact factors (such as groundwater protection, earthquake faults, environmental control systems, health risks, etc.) specific to each of the identified new and expansion sites and measures that will be taken to mitigate those impacts. The commentators further state that the Draft EIR did not

consider project alternatives, including alternatives to siting new landfills and expansion of existing landfill projects identified in Chapter 6 of the Preliminary Draft CSE.

CEQA Guidelines

The Draft EIR was prepared in accordance with the requirements of Title 14, Chapter 3 - Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) of the California Code of Regulations, and Los Angeles County's Environmental Document Reporting Procedures and Guidelines. A Notice of Preparation of the Draft EIR, consisting of a project description, locations list of cities, and a completed Initial Study of Environmental Factors Checklist were distributed to more than 112 State and City agencies, special districts, interest groups, and individuals on January 19 and 30, 1995. The mandatory 30-day period to receive comments on the Notice of Preparation concluded on March 2, 1995. The agency and public comments on the Notice of Preparation were taken into consideration in preparing the Draft EIR.

The Preliminary Draft CSE and Draft EIR were circulated and made available for public review for 210 days, between March 11, 1996 and October 17, 1996. During this period, written comments were submitted to the DPW. Written and oral comments were also received at public information meetings on the Preliminary Draft CSE and Draft EIR, which were conducted between April 1 and April 22, 1996. The official notices of publication are included in Volume III, Attachments, of the Final Draft CSE. All comments on the Preliminary Draft CSE and Draft EIR received during the public comment period are addressed in the respective document. Please refer to Topical Response No. 7 for further discussion on the public review procedures.

Environmental Impact Factors

The purpose of the EIR is to provide public agencies, businesses, community and environmental organizations, and the public with information about the overall effects which the adoption of the CSE is likely to have on the environment; to list ways in which the potential significant effects might be minimized; and, to indicate the alternatives, if any, to this project. CEQA requires an EIR to identify all potentially significant impacts of a project, determine the extent to which those impacts could be reduced or avoided, and identify and evaluate feasible alternatives to the project (Title 14, Chapter 3 - Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines), Section 15121 of the California Code of Regulations).

However, as mandated by the California Integrated Waste Management Act of 1989 (Assembly Bill 939), as amended, the purpose of the CSE is to provide a planning mechanism to address the solid waste disposal capacity needed by the 88 cities in Los Angeles County and the County unincorporated communities for each year of the 15-year planning period, through a combination of existing facilities, expansion of the

existing facilities, proposed new facilities, and other strategies. The CSE establishes goals, policies, and guidelines for proper planning and siting of solid waste transformation and land disposal facilities on a Countywide basis. It offers strategies and establishes siting criteria to be used as an aid to evaluate sites proposed for development of needed solid waste transformation and land disposal facilities.

The CSE also describes areas and strategies that may be used to address State mandates for adequate transformation or disposal capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program. As such, the Draft EIR is not intended to provide detailed information on impacts and mitigation measures for the siting of solid waste disposal/transformation facilities listed. The Final EIR is not a Program EIR nor is it intended to be a Master Environmental Assessment Report. Definitive information can only be accomplished for specific sites and projects. As they develop, specific sites and projects must each fully comply with all requirements of CEQA.

Using both State and County guidelines for the preparation and processing of environmental documents under CEQA, the Draft EIR is intended to provide the following functions: be an informational document, provide an acknowledgment of possible environmental effects, identify potential problem areas, and to set forth appropriate standards and/or possible mitigation measures. The sites identified in the CSE are potential areas which are likely to conform to the siting criteria only. State law requires that proponents of new solid waste disposal facilities or expansion of existing facilities at these sites undergo rigorous site-specific environmental assessment and documentation. An environmental impact assessment is not intended to resolve disagreement among experts regarding technical matters. It is an informational document only.

Project Alternatives

The project evaluated in the Draft EIR is the Los Angeles County CSE. CEQA Guidelines specify that a reasonable range of alternatives that could feasibly attain the objectives of a project is required to be considered and evaluated in an EIR. "Feasible" is defined as capable of being accomplished in a successful manner within a reasonable period of time taking into consideration economic, environmental, social, and technological factors (Public Resources Code, Section 21061.1). An alternative does not need to be considered if its environmental effects cannot be reasonably ascertained and if implementation of such an alternative is remote and speculative. According to CEQA, the alternative's discussion should focus on those alternatives that, if implemented, could eliminate or reduce any of the significant environmental impacts not mitigated by the proposed project.

Chapter 8 of the Draft EIR evaluated the range of alternatives to the CSE project based on their ability to satisfy the specific objectives of the proposed project. The "No-Project Alternative" (which means no CSE would be prepared) was evaluated and it was concluded that it is not a preferred alternative since it would not achieve the objectives of the project. As such, the "No-Project Alternative" was not selected.

Since State law mandates the County to prepare the CSE, no other alternative is considered feasible to attain the objectives of this project. As such, none was considered.

1.2.9 Topical Response #9: Disposal Need Projection

Comments have been received asserting that the Preliminary Draft CSE exaggerated the projection of waste generation and the need for additional landfill capacity. The commentators state that the Preliminary Draft CSE employed demographic factors not reflective of the County's population and economy thus leading to higher estimates and accelerating the claim that additional new landfill capacity is needed or required to offset an imminent crisis. The commentators further state that the Preliminary Draft CSE employed calculations which artificially shortened the date when a shortfall in permitted daily disposal capacity is projected to occur by assuming each landfill is filled to maximum daily permitted capacity as opposed to the actual disposal rate at each landfill. Comments such as these have been received from residents and businesses within the host communities, the Alliance for Innovative Resource Management, the Natural Resources Defense Council, the City of Los Angeles, the City of Santa Clarita, LASER and other interest groups.

Section 18755.3 (b) of Title 14 of the CCR requires a description of the anticipated disposal capacity needs for the 15-year planning period beginning with the year the CSE is prepared. Each jurisdiction was required to address this issue as part of the preparation of their Source Reduction and Recycling Element (SRRE); however, utilization of the solid waste quantity projection data contained in the jurisdictions' SRREs posed three problems.

- First, the SRRE projection data typically covered the planning period from 1990 to 2005, whereas the CSE's planning period would extend from 1996 to 2010 in the case of Los Angeles County. Therefore, additional projections would be required for the period from 2006 through 2010.
- Second, the local economy experienced a deep recession between 1990 and 1995, which significantly reduced solid waste generation and disposal quantities in Los Angeles County. For the most part, the local jurisdictions' SRREs had been completed or were nearing completion before the greatest impact of the recession was experienced. Thus, this factor was not taken into consideration in the projections contained in the SRREs.

- Third, the Countywide 1990 solid waste disposal quantities calculated based on data provided in all jurisdictions' SRREs are substantially less than the actual 1990 quantities as determined by the Task Force and reported to the California Integrated Waste Management Board (CIWMB) in the report dated March 28, 1991 (see Chapter 4, Subsection 4.3). As such, the 1990 SRREs' data was not used to project the disposal capacity need through 2010.

Selection of Projection Methodology and Data

Based on the foregoing, new projections were clearly needed which reflected more accurately the conditions existing at the time of preparation of the CSE. The methodology selected for use in projecting solid waste generation and disposal for the 1996-2010 planning period is the CIWMB's Adjustment Methodology. Some commentators have criticized this methodology as unreliable and that it should not be used as an accurate projection tool.

Many alternatives were considered for use in projecting Countywide waste generation for the 1996-2010 planning period. These include use of the waste generation growth factors from each jurisdiction's SRRE, an adaptation of the CIWMB's Adjustment Methodology, and waste generation growth rates based on population growth projections.

The use of growth factors from each jurisdiction's SRRE were not selected because of the complexity involved in projecting waste generation for 89 individual jurisdictions. Typically, the jurisdiction's projections were based on jurisdiction-specific population and economic growth projections which are either difficult to emulate or which may now be outdated.

Other methodologies, such as the projection of per capita waste generation in conjunction with population trends, were not used because of their failure to take into consideration the impact that changes in economic conditions has on waste generation. Nearly three fifths of all solid waste generated in Los Angeles County can be attributed to economic activity (i.e., commercial/industrial sources generated about 58 percent of all waste generated in the County). Major changes in economic activity would have a significant impact on waste generation, however, population-based methods do not take into account this important factor. For example, linearly projecting the per capita waste generation data for 1990 through 1994 (a recessionary period) and using the projected per capita waste generation figures to project total waste generation, incorrectly assumes that the recession of the early 1990s would continue into the future without any economic recovery.

The use of growth rates based on population growth projections was considered for use since population projections are available from the State Department of Finance through the year 2010. However, projections based on population growth would not be able to

account for economic downturns or a resumption of strong economic growth in the Los Angeles area in the next few years, which may have a significant effect on solid waste generation. Therefore, this alternative was not selected.

The projection methodology selected for use in the CSE consists of projecting solid waste generation using the CIWMB's Adjustment Methodology. The CIWMB-approved Adjustment Methodology measures how increases or decreases in population, employment, inflation-adjustable taxes sales and special events (such as natural disasters) affect waste generation amounts. The Adjustment Methodology provides jurisdictions with a valuable tool for more accurately measuring their progress in reducing solid waste disposal, as well as for estimating future disposal quantities.

The adjustment formula uses a combination of ratios of base year to target year population, employment, and taxable sales to calculate target year solid waste generation, and maximum allowable disposal amounts based on established diversion goals. Since population, employment, and taxable sales influence residential waste generation rates differently than waste generated by non-residential sectors (i.e., commercial, industrial, etc.), the formula also provides correction factors to address these variances. As such, residential waste quantities are calculated separately from non-residential solid waste and then combined.

The Adjustment Methodology is considered to provide the most accurate representation of the effects of economic and population growth on waste generation. As previously indicated, the methodology requires the use of historical data on population, employment, taxable sales, and the Consumer Price Index. It also requires knowledge on the distribution of waste generation by sector (residential and non-residential) for the year to be projected. Therefore, the adaptation of this method for waste projection purposes would require projections of the above factors through the year 2010. Although no State projections are available through the year 2010 for Los Angeles County employment and taxable sales, and no data is available on the distribution of waste generation by sector for each year of the planning period, a number of reasonable assumptions can be made to enable the use of the CIWMB's Adjustment Methodology in projecting waste generation. It should be noted that although certain assumptions are necessary to enable the use this Methodology, it still represents the best available method for projecting solid waste generation and the only one that take into account projected changes in future economic conditions. Chapter 4, Section 4.4.3 of the Final Draft CSE provides a detailed discussion of this waste generation methodology, including a discussion of the best available data through the year 2010, and how it was projected to estimate unavailable data for use in the CIWMB's Adjustment Methodology.

The resulting projections in waste generation, diversion and disposal for each year of the 15-year planning period are shown in Table 4-4 of the Final Draft CSE. This table also provides the needed Class III landfill disposal capacity for each year of the planning

period assuming no additional transformation capacity will be developed during the 15-year planning period. Additionally, the analysis assumes that Los Angeles County will be responsible for management of solid waste generated in Los Angeles County. As such, the analysis does not take credit for that portion of solid waste exported out of Los Angeles County nor does it consider any capacity for imported solid waste to Los Angeles County. The data provided in Table 4-4 excludes quantities of inert solid waste disposed of at unclassified landfills for the reason listed below.

- The trend towards increased recycling of construction and demolition waste has and will continue to result in substantial reductions in the quantities of inert waste in need of landfill disposal.
- Higher tipping fees at Class III landfills compared to tipping fees at unclassified landfills have and will continue to reduce/eliminate disposal of inert waste at Class III landfills.
- Based on the study conducted as part of the preparation of the CSE, the remaining permitted combined unclassified landfill capacity as of December 31, 1995, is estimated at approximately 53.1 million tons (35.4 million cubic yards). Table 4-3 lists permitted unclassified landfills in Los Angeles County existing in 1995, and the quantities and rates of inert waste disposed at these facilities in 1995. At the 1995 average rate of disposal of 1,770 tons per day (six days/week) at **permitted** unclassified landfills, this capacity would be mathematically exhausted in approximately 96 years. Additionally, the Nu-Way Live Oak Landfill became permitted in 1996, further increasing the permitted capacity available for disposal of inert waste. As such, it is believed (as it was believed in 1990), that Los Angeles County currently has adequate permitted unclassified landfill disposal capacity, and that no inert waste capacity crisis currently exists. Based on the foregoing, the CSE's projected disposal capacity needs for each year of the 15-year planning period exclude the need for unclassified landfills.

Disposal Capacity Shortfall Analysis

From the planning process, starting with the Solid Waste Management Action Plan, the Los Angeles County Department of Public Works has developed an analytical procedure based on surveys, actions by regulatory agencies, and new legislative mandates that reviews remaining daily disposal capacity at permitted landfills and projects when the amount of waste in need of disposal would exceed the available daily disposal capacity. These procedures provide for updating on a regular basis. Assumptions are made in projecting the amount of waste in need of disposal. These same assumptions have been consistently used since 1990, and the Department believes they are very conservative.

Some commentators believe the "Disposal Capacity Shortfall" analysis is flawed because it assumes each landfill is filled to maximum daily permitted capacity as opposed to the actual disposal rate at each landfill. These commentators' opinions are inaccurate. The assumptions used in creating the various scenarios for the "Disposal Capacity Shortfall" analysis considers full achievement of AB 939 waste diversion mandates of 25 percent by 1995 and 50 percent by the year 2000 and thereafter, and considers a combination of maximum daily permitted capacity as well as the average daily (actual) disposal rate at each landfill. Expected daily tonnage rates based on maximum permitted daily capacity were assumed for the Antelope Valley, Azusa, Bradley, Lancaster, Pebbly Beach, Puente Hills, Spadra, and Sunshine Canyon Landfills while average daily (actual) disposal rates were assumed for Brand Park, Burbank, Calabasas, Chiquita Canyon, San Clemente, Scholl Canyon, and Whittier (Savage) Canyon landfills. The determination of what assumption is made, whether maximum or actual, for a particular landfill depends on site specific conditions such as defined watershed boundaries, restrictions on operating permits, allocations of waste capacity (daily/weekly/yearly), and inability to predict where a given load of waste will be dumped in a free market.

As indicated in Chapter 4, Section 4.3, the Los Angeles County Department of Public Works has established a process for tracking solid waste disposal quantities at landfills and transformation facilities which is based on the Solid Waste Disposal Quantity Reporting System and the monthly Solid Waste Management Fee invoices submitted to the Department of Public Works by landfill and transformation facility operators. Based on this information and that available by other regulatory agencies (including the Disposal Quantity Reporting System data from Counties receiving Los Angeles County's waste export), the Department of Public Works has a continuing process of projecting waste disposal demand and available capacity.

The dynamics of the existing solid waste management system in Los Angeles County also result in the projection process being very dynamic. Consequently, projections of waste disposal demand and available capacity are based on reasonable assumptions that reflect past experience, use a conservative approach, and project various scenarios.

"Disposal Capacity Shortfall" is defined as the amount of solid waste in need of disposal exceeds the daily permitted capacity.

Disposal Capacity Shortfall Analysis is a comparison of the projected date of daily permitted disposal capacity shortfall with the date additional daily capacity can be permitted. Past experience has shown that it takes three to seven years (or more) to permit an expansion of an existing Class III landfill and between seven and ten years (or more) to site a new Class III landfill facility. Additionally, as discussed in Subsection 4.5.1 and Chapter 5 of the Final Draft CSE, the development of new transformation facilities is a remote possibility at this time. Thus, when a shortfall in **permitted daily capacity** at Class III landfills is predicted to occur in less time than it takes to permit new

capacity, immediate action is necessary to ensure disposal services continue to be provided to residents and businesses without interruption and at reasonable cost.

It should be noted that the waste management system in this County is dynamic and market driven. Each analysis performed is a snapshot at that particular point in time, and the circumstances can change each day. As such, the Disposal Capacity Shortfall Analysis discussed in the Final Draft CSE clearly defines the boundaries/assumptions applicable to each scenario presented.

The Final Draft CSE includes an updated Disposal Capacity Shortfall Analysis in Tables 4-5 through 4-16. This analysis included total disposal capacity at all facilities Countywide. Scenario A considers only existing permitted disposal capacity, full implementation of AB 939 waste diversion programs identified by each jurisdiction in the County, and the achievement of the waste diversion mandates of 25 percent by 1995 and 50 percent by 2000 and thereafter, through the year 2010.

Additional scenarios on the various combinations of factors that could change the outcome of the disposal capacity shortfall analysis other than the best and worst case scenarios have been added to the Final Draft CSE. Chapter 4, Sections 4.5 and 4.6 of the Final Draft CSE include additional scenarios showing a range of possible situations. There are an infinite number of possible scenarios, some are more plausible than others. Each scenario is a speculation as to what may or may not happen. The scenarios considered in addition to the original best and worst case scenarios are:

- Table 4-5, Scenario A. This scenario assumes that all Los Angeles County solid waste that must be disposed of will be managed at existing in-County permitted disposal facilities during the 15-year planning period. The analysis also assumes that no new transformation facilities, no new landfills, and no expansions of existing landfills will become operational within Los Angeles County during the planning period.
- Table 4-7, Scenario B. This scenario is similar to Scenario A, except that it considers the potential disposal capacity savings that may be realized at in-County landfills by using alternative daily cover materials.
- Table 4-9, Scenario C. This scenario considers existing in-County permitted disposal facilities and utilization of up to 6,000 tons per day of out-of-Los Angeles County landfills. The analysis also assumes that no new transformation facilities, no new landfills, and no expansions of existing landfills will become operational within Los Angeles County during the 15-year planning period.

- Table 4-11, Scenario D. This scenario assumes that all Los Angeles County solid waste that must be disposed of will be managed at existing in-County permitted disposal facilities during the 15-year planning period. Additionally, the scenario assumes that all proposed expansions of existing in-County landfills, as identified in Chapter 7 of the Final Draft CSE, will be successfully permitted and developed to their full capacity, as proposed. This scenario also assumes that no new landfills will become operational during the 15-year planning period.
- Table 4-13, Scenario E. This scenario is similar to Scenario D, except that it assumes that all proposed new in-County landfills, as identified in Chapter 7 of the Final Draft CSE, in addition to the expansions of existing landfills, will be successfully permitted and developed to their full capacity, as proposed.

The above scenarios provide a sufficient range of possible future conditions to enable decision makers to evaluate the impacts of the solid waste management policies that are ultimately pursued.

1.2.10 Topical Response #10: Goals and Policies of the Project

Comments have been received asserting that the Preliminary Draft CSE provided a very limited scope of policies for how to promote waste diversion activities at disposal facilities and does not include measures to save or conserve existing disposal capacity at all in-County landfills. The commentators further state that the Preliminary Draft CSE contains no policies or plans to assist the development of new transformation technologies or other landfill disposal alternatives such as composting, etc.; that the document should be revised to articulate a goal of securing only disposal capacity that is absolutely necessary after maximizing diversion, conserving landfill space, and using existing sites outside the County and other available strategies.

As discussed in Topical Response # 1: Purpose of the Project, the California Integrated Waste Management Act of 1989 (AB 939, as amended) established an integrated system of solid waste management in the State, with a hierarchy of waste management practices to be promoted in the following order of priority: (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation/land disposal. AB 939 also mandated all jurisdictions in the State to achieve waste diversion goals of 25 percent by 1995 and 50 percent by the year 2000. AB 939 required each city and county (for the unincorporated areas) to prepare a series of planning documents showing how the city/county intends to meet the waste diversion mandates. These documents specifically deal with the first two items in the waste management hierarchy, and include Source Reduction and Recycling Elements (SRREs), Household Hazardous Waste Elements (HHWEs), and Non-disposal Facility Elements (NDFEs). State regulations also require counties (not the cities) to prepare a Summary Plan which summarizes the contents of all the jurisdictions' SRREs, HHWEs, and NDFEs.

State law also recognized that any integrated system of waste management must include proper planning for the provision of adequate environmentally safe transformation/land disposal capacity, the third item in the waste management hierarchy. Consequently, each county is also mandated to prepare a countywide siting element which addresses the disposal capacity needs of all the cities and unincorporated areas within the county for a 15-year planning period. Consistent with these requirements of State law, the Preliminary Draft CSE deals with disposal issues only. The law did not intend the CSE to address issues, such as diversion, which other planning documents have already addressed.

The CSE establishes a planning mechanism, which would facilitate the provision of a minimum of 15-years of disposal capacity on a continuous basis through landfills, transformation facilities, or any combination of these. This mechanism would be applicable to any present and future proposals to develop solid waste landfills and transformation facilities. This is the reason why the Draft EIR and CSE discuss, for example, the potential impacts of, and siting criteria to be applied to, any future transformation facility proposals even though no new transformation facilities are currently being proposed.

Additionally, Topical Response #2, Alternatives to Siting New Landfills and/or Expansion of Existing Landfills, provides a discussion on the issues and measures such as landfill mining, baling, biostabilization and shredding of waste, and use of alternative daily foam covers to conserve landfill volume and, therefore, extend landfill life. The beneficial impacts of implementing these measures at landfills depend on site specific conditions such as the type of landfill, type of waste stream, and efficiency of existing landfilling operations in regards to compaction methods and density, recycling and material salvaging operations, and the use of alternative daily cover materials. Additional information regarding alternatives for extending the life of in-County disposal sites is discussed in Section 5.4 of Chapter 5, Alternative Disposal Technologies, of the Final Draft CSE.

The Goals and Policies of the CSE (Chapter 2, of the Final Draft CSE) have been enhanced or revised to be more focused and includes goals and policies for the implementation of capacity-saving measures at all in-County landfills.

1.2.11 Topical Response #11: Siting Criteria

Comments have been received asserting that the Preliminary Draft CSE does not provide for a strategy to include residents in the decision making process for the siting of disposal/diversion facilities.

The siting criteria have been developed to provide planners and decision-makers a uniform set of guidelines and standards that may be used as a tool to identify both

potential sites and significant siting concerns. However, an understanding of the basic engineering and operational characteristics of the various types of solid waste disposal facilities, their typical impacts, and the range of mitigation measures available are also essential when evaluating sites.

Facility planners and the public at large should, however, be aware of the inherent limitations of the criteria developed as the issues involved can be complex and controversial. While good criteria can focus the pertinent factors, they cannot remove all controversy from the process. Moreover, the final decision can be of a political nature. Early public involvement and environmental mediation are methods to consider for constructively channeling conflicts into compromise.

Proponents proposing to construct solid waste disposal facilities in Los Angeles County must apply for and be issued a series of both ministerial and discretionary permits from local and/or State regulatory agencies. The requirements of the California Environmental Quality Act of 1970 and the Permit Streamlining Act of 1977 govern the standard permit processing framework to a great degree.

The California Environmental Quality Act (CEQA) provides a process which requires that governmental decision-makers consider the environmental effects of their decisions and take measures to prevent significant, avoidable damage to the environment. While CEQA, among other requirements, set guidelines and regulatory standards for public participation and involvement, the Permit Streamlining Act places time limits in the review and decision-making processes of public agencies.

The siting of solid waste disposal facilities can be a highly volatile and emotional process. Public participation is included in the CSE as it is believed that a well-informed public is the key for successful siting of solid waste disposal facilities. The importance of early public involvement must be stressed to ensure adequate opportunities for public concern, involvement, and to welcome public input into the decision-making process to better serve public needs.

The CSE discusses the importance of an effective public participation program, beginning at the earliest planning stages and continuing throughout the permitting process. An effective public participation program should allow for the expression of public concerns, suggestions for alternatives and new strategies, as well as the review and assessment of the proposed measures. Such a program is essential to the acceptance and support of any plan developed.

To achieve this goal, a hierarchy of increasing public involvement levels was recognized and discussed in Chapter 5, Facility Siting Criteria of the Preliminary Draft CSE, as follows:

1. Public Information
2. Public Education
3. Community Relations
4. Community Involvement
5. Public Participation

1.2.12 Topical Response #12: Consideration of Land Use or General Plan of Proposed Areas

Comments have been received asserting that the Preliminary Draft CSE identifies potential sites suitable for development as Class III landfills without consideration for the land use or general plan of the proposed areas.

The siting of a solid waste disposal facility requires the proponent to obtain a land use permit from a city or the County government, depending where the site is located. Zoning ordinances generally do not specifically designate lands that can be used for solid waste disposal facilities as a permitted use. However, solid waste disposal facilities have been authorized within specific zoning classifications when a conditional use/land use permit is obtained.

Each public agency in California is required to compile a list specifying in detail the information to be required of an application for a development project. The proponent of a solid waste disposal facility needs to fill out a development project application with the required information and submit it to the appropriate local agency (e.g., planning departments). Generally the following is required:

- Information about the applicant
- Location of property and approximate size
- A description of the project
- A description of the site
- A description of how public services and utilities will be provided
- A discussion of the possible environmental impacts

The agency uses this information in determining conditions to be placed on the land use permit and in approving a General Plan amendment, if necessary. In addition, this information is used to determine if a request for a zone variance is appropriate. In reviewing this information, the local agency uses this information in their Initial Study for determining whether an Environmental Impact Report or Negative Declaration is required as mandated by the California Environmental Quality Act (CEQA).

After the conditional use/land use permit application is submitted to the appropriate agency, the agency has 30 days in which to review the application for completeness and inform the applicant of those areas which are incomplete, if any.

Once the application is determined to be complete, the agency initiates the environmental review process under CEQA and orders the preparation of the appropriate environmental document. Following preparation of the final environmental document, a land use permit decision is made, usually by the local planning commission, board of zoning adjustment, or zoning administrator and/or local legislative body. The final permit decision is either approved, approved with conditions, or disapproved for the project.

Chapter 7 of the Final Draft CSE identified two sites in Los Angeles County as being suitable for potential new Class III landfills and six sites as potential expansions of existing Class III landfill facilities. Figure 7-1 shows the location of these sites. These sites are the areas where the siting criteria described in Chapter 6 may be applicable for the development of additional Class III landfill disposal capacity necessary to address the disposal requirements of AB 939 for the 15-year planning period. However, before development of any of these facilities or any other land disposal/transformation facility, the facility proponent is required to:

- Demonstrate that the project is in conformance with the CSE.
- Demonstrate that the project is consistent with the applicable local jurisdiction's General Plan. If the local land use authority does not make a determination of consistency with the local jurisdiction's General Plan before the next revision of the CSE, then the project must be removed from the document.
- Undertake a vigorous site specific assessment for the proposed project.
- Address all environmental concerns as mandated by the California Environmental Quality Act.
- Satisfy the permitting requirements of Federal, State and local agencies with jurisdiction over the project.

As a part of the determination of conformance with the Countywide Siting Element and its Siting Criteria, the project proponent must obtain approval from the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force. The finding of conformance process is discussed in Chapter 10 and the siting criteria is detailed in Chapter 6 of the Final Draft CSE.

1.2.13 Topical Response #13: References to the 1988 Solid Waste Management Action Plan

Comments have been received asserting that the Solid Waste Management Action Plan is an antiquated policy document which is inconsistent with and undermines the new CSE and purposes of AB 939. The commentators further state that there is no requirement in AB 939 that the CSE must be consistent with the Action Plan or vice versa, since the California Integrated Waste Management Plan which includes the CSE, Summary Plan, and other planning documents for AB 939 will replace all existing policy documents including the 1988 Action Plan. Therefore, the commentators state that all references to the Action Plan other than as a historical footnote or background must be removed from the CSE.

In the mid-1980s, Los Angeles County experienced unprecedented population growth and subsequent increases in waste generation and was facing a situation of rapidly decreasing landfill capacity. The situation was created due to a lack of development of planned waste-to-energy facilities which was caused by public opposition. As a result, to protect the public health and avert a waste disposal crisis, on October 28, 1986, the County Board of Supervisors initiated a comprehensive solid waste management study and implementation program. This and subsequent Board actions resulted in the development of various planning strategies addressing the solid waste management options, economic considerations, and the identification of the best sites for future landfill capacity. These strategies were incorporated in the following planning documents: the Los Angeles County Solid Waste Siting Project (March 1987); the Report on the Solid Waste Management Status and Disposal Options in Los Angeles County (February 1988); and the Preliminary Alternate Site Study (January 1988). These planning strategies were the building blocks which led to the development and adoption of the Los Angeles County Solid Waste Management Action Plan (Action Plan) by the Board of Supervisors in April 1988. The Action Plan was subsequently adopted by the County Sanitation Districts of Los Angeles County Board of Directors, representing 76 Cities in Los Angeles County, in May 1988 and the City of Los Angeles Board of Public Works.

The commentators claim that the County's Solid Waste Management Action Plan adopted by the Board of Supervisors in 1988 "minimized" diversion potential and therefore, is inconsistent with and undermines the new CSE and the purpose of AB 939. Contrarily, the Action Plan has established an integrated solid waste management system which incorporated source reduction, recycling, composting, and household hazardous waste management programs on a Countywide basis. These programs, clearly are consistent with requirements of the California Integrated Waste Management Act of 1989, Assembly Bill 939, which became effective 20 months after adoption of the Action Plan.

The Action Plan has emphasized that there is no single solution to the management of solid waste. It called for the implementation of recycling and composting programs, securing additional in-County disposal capacity, and the pursuit of out-of-County disposal capacity. Through the Action Plan, the Board of Supervisors took leadership in providing for a long-range solution for the management of solid waste on a Countywide basis using the following goals:

- Continue to pursue a balance between public and private waste management operations to provide residents Countywide an efficient and economic method of waste disposal
- Support the Countywide implementation of residential and commercial recycling, green waste composting, and household hazardous waste programs
- Continue to support public education and awareness programs
- Develop 50 years of permitted solid waste disposal capacity to be held in public ownership with appropriate land use protections, for use through public, private, or public/private joint venture operations
- Perform detailed environmental studies of the six potential landfill sites as identified in the Preliminary Alternate Site Study
- Support expansions of existing landfills to the maximum extent technically and environmentally feasible

Following adoption of the Action Plan, the Board of Supervisors began full implementation of the Countywide Household Hazardous Waste Program, Countywide Backyard Composting Program, various Countywide public education efforts including elementary and secondary programs addressing solid waste management. The Board also adopted a recycling ordinance and implemented curbside recycling programs in the unincorporated communities. Additionally, the Board urged all cities in Los Angeles County to cooperate and take responsibility for the waste they generate and implement measures to reduce waste generation. Thus, the Action Plan has played a critical role in the proper management of solid waste in Los Angeles County and in maintaining an efficient and economic solid waste management system in the County.

1.2.14 Topical Response #14: Assessment of New and/or Alternative Technologies

Comments have been received asserting that the Preliminary Draft CSE does not contain policies or plans to assist the development of new transformation technologies or other landfill disposal alternatives. The commentators further state that the Preliminary Draft CSE does not contain policies or plans which promote or enhance methods of technologies which conserve in-County disposal capacities.

The primary goal of the Los Angeles County CSE is to establish a planning mechanism that will ensure adequate disposal capacity to provide, reliably and economically, for the solid waste disposal needs of the residents of the 88 cities in Los Angeles County and the

County unincorporated communities. This is intended to be accomplished primarily through a combination of in-County landfill and transformation capacity (provided environmentally and technically feasible sites exist within the County for these types of facilities), and utilizing out-of-County/remote disposal facilities as a means to supplement and extend the life of in-County disposal capacity.

In the last few years, proposed new landfills and expansions of existing landfills have encountered strong opposition to their development, particularly from residents living near those facilities and from environmental groups. This has resulted in an increasing interest in finding alternatives to landfill disposal that, it is hoped, would have reduced negative impacts or have beneficial impacts on the environment.

The goals and policies in the Final Draft CSE have been revised to include policies which foster development of alternative waste disposal technologies. This is discussed in Chapter 2 (Subsection 2.4.1). Furthermore, the Final Draft CSE has been revised to include a new Chapter 5, to address all issues regarding development of alternative waste disposal technologies and its limitations, and methods which promote or enhance technologies to conserve in-County disposal capacity. Thus, these methods could extend the life of existing in-County landfills.

However, when evaluating alternatives to landfill disposal one must consider the definition of disposal under current State law to properly differentiate between disposal alternatives and diversion alternatives. State law (Section 40120.1 of the Public Resources Code) defines disposal as “the management of solid waste through landfill disposal or transformation at a permitted solid waste facility.” Therefore, under the current law, the only disposal alternatives to landfills are transformation facilities.

State law (Section 40201 of the Public Resources Code) also defines transformation to mean “incineration, pyrolysis, distillation, gasification, or biological conversion other than composting. ‘Transformation’ does not include composting or biomass conversion.” Alternative disposal technologies, i.e., transformation facilities, can extend the life of landfills by reducing the amount of waste in need of land disposal. Additionally, the adoption of measures may extend the life of existing landfills which may further reduce the amount of solid waste disposed, and/or optimizes the use of permitted landfill airspace by reducing the volume of cover materials and increasing compaction levels.

The development and viability of the various proposed alternative disposal technologies, and the methods to enhance existing landfill capacity, depend on technical and economic factors, air quality standards, and public acceptance. Further studies and testing of many of these technologies may be needed to determine if they are economically feasible.

APPENDIX 1-B

ORAL COMMENTS AND SPECIFIC RESPONSES

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APPENDIX 1-B

ORAL COMMENTS AND SPECIFIC RESPONSES

Public Information Meetings were conducted throughout the County between April 1, 1996 and April 22, 1996. Oral comments were received from State, cities and other governmental agencies, residents, businesses, environmental groups, and other special interest groups. The table listed below provides a listing of persons, organizations and public agencies orally commenting on the Preliminary Draft CSE and Draft EIR, including a summary of their comments and specific responses to those comments.

- Table B-1, Summary of Oral Comments Received During Public Information Meetings on the Los Angeles County Countywide Siting Element

It should be noted that if the text of an oral comment or a written comment is submitted concurrent/subsequent to an oral comment, the comment is listed in Table B-1 for reference only and the subject comment is included in Appendix 1-C, Written Comments and Specific Responses.

**Table B-1
Summary of Oral Comments Received During Public Information Meetings
on the Los Angeles County Countywide Siting Element**

COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
1	4/1/96	Dick Seeley Citizen	Is there any research for alternate facilities?	The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE. Also, refer to Topical Response #14.
2			If bills (HR 924, S 393) pass, will that be an end to Elsmere?	The Elsmere Canyon landfill project has been scaled down to reflect the Federal law (Public Law 104-333, the Omnibus Public Land Bill of 1996, Section 812). Please refer to Topical Response #6.
3	4/1/96	Frank Kortum Citizen	1. Why does the Department try to create this mythical landfill crisis in order to justify more landfills?	The need for additional landfill capacity is based on the disposal capacity shortfall analysis presented in Chapter 4 of the CSE. This information regarding landfill capacity was provided by the landfills which is the most reliable source. Please refer to Topical Responses #1 and #9.
4			2. Why was a 30 day notice not given nor a Notice of Preparation issued. And why are we just repeating the mistakes of the previous siting plan which was never certified?	The 30-day notice to receive comments on the Notice of Preparation of a draft EIR was circulated between January 19, 1995 and March 2, 1995. The agency and public comments were taken into consideration in preparing the Draft EIR.
5			Clarify this statement: ...Page 4-26 of the document says that the planning process should include a variety of alternatives to ensure that the provision of solid waste service remains uninterrupted. Yet in page 8-2 of the DEIR, it rejects any consideration of alternatives.	Please refer to Topical Responses #1, #8, #10, and #14.
6			4. Why does the County predict a 22,000 TPD disposal capacity shortfall in 1996.	Please refer to Topical Response #9 and Chapter 4 of the final CSE.
7			5. Why does the Draft Siting Element continue to list landfills where no access is available such as Blind Canyon, Mission-Rustic-Sullivan and Towsley Canyon?	Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System. Please refer to Topical Response #6.
8			6. Why does the element lists inaccurate capacity figures for landfills like Chiquita Canyon where the capacity is likely to be reduced?	Please refer to Topical Response #9.
9		Betsy Landis Waste Management Task Force	How long will the County stay and answer questions?	The County accepted all comments from the audience present. Please refer to Topical Response #7 for further information.

**Table B-1
Summary of Oral Comments Received During Public Information Meetings
on the Los Angeles County Countywide Siting Element**

COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
10	4/2/96	Susan Crawford Vila LASER	1. Why did you utilize information that's one to two decades old as a basis for your top four choices?	Please refer to Topical Responses #1.
11			2. Why have you chosen four significant Ecological Areas in which to site dumps?	Please refer to Topical Response #8 and #11.
12			3. Did you consider the profound loss of environment, sensitive animal and plant habitat that the siting of these dumps would cause?	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.
13			4. Why have you chosen two sites that are owned by the Santa Monica Mountains Conservancy, namely Towsley and Blind Canyons, particularly when you know they will never allow such land use and that they are already set aside for public parks?	Blind canyon continues to be among the highest ranking sites for the potential development of new landfills in Los Angeles County. The CSE identifies this site for planning purposes as required by State law, and in no way a guarantee that a sanitary landfill will be built at this location. The project proponent must come forward with a concrete proposal, acquire the property, and submit a request for a land use permit to begin the permitting process, which includes demonstrating the technical and environmental feasibility of the site.
14			5. Why would you choose Mission-Rustic-Sullivan Canyons when they've been staunchly protected for over 30 years by people who will never allow you to dump there again?	Please refer to Topical Response #6 and #11. Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System.
15			6. Why would you choose Elsmere, which is National Forest land, when they've already said they will not allow such land usage nor transfer of lands?	Please refer to Topical Response #6. Elsmere Canyon landfill will remain in the document unless the project proponent withdraws the project from consideration by the County. The project as presently proposed cannot be built due to the restrictions on the use of the National Forest land. Federal law (Public Law 104-333, the Omnibus Public Land Bill of 1996, Section 812) now prohibits the siting of a solid waste landfill in the portion of the project area within the Angeles National Forest. However, a scaled-down project is currently being considered by the project proponent for the portion of the property outside the Angeles Forest Boundary.
16			7. Have you accurately studied the true costs of landfilling, including post-closure costs?	Please refer to Topical Response #6. This comment is beyond the scope of the CSE. The CSE serves as a policy manual rather than a specific development program. Closure and post closure maintenance is addressed in Article 3.3, Section 18230 of the CCR.

**Table B-1
Summary of Oral Comments Received During Public Information Meetings
on the Los Angeles County Countywide Siting Element**

COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
17	4/2/96	Susan Crawford Vila LASER	8. Have you accurately compared landfilling costs to alternatives such as remote site rail haul, bioconversion, composting, recycling, reduction, material recovery facilities, ad infinitum and concluded correctly that landfilling is far more expensive?	The objectives of the CSE include, protecting the economic well-being of Los Angeles County by ensuring that the County is served by an efficient and economical public/private solid waste disposal system, providing siting criteria that considers and provides for the environmentally safe and technically feasible development of solid waste disposal facilities, and promoting the development and utilization of environmentally sound and technically feasible remote land disposal sites, and promoting the development of the facilities necessary to provide access to these sites, in order to supplement and extend the life of in-County land disposal capacity. See page ES-4, items 2, 3, and 6 and topical response #5, Economics of Landfilling Using In-County Disposal Capacity.
18			9. What happens 30 years after closure when the dump operator is no longer responsible for the site? Do you think these sites can just be abandoned?	This comment is beyond the scope of the CSE. The CSE serves as a policy manual rather than a specific development program. Closure and post closure maintenance is addressed in Article 3.3, Section 18230 of the CCR.
19			10. Who pays for the centuries of toxic clean-up?	This comment is beyond the scope of the CSE. The CSE serves as a policy manual rather than a specific development program. Closure and post closure maintenance is addressed in Article 3.3, Section 18230 of the CCR.
20			11. Are you aware that Germany has outlawed dumps entirely because of the unending billions of dollars wasted on vain attempts to contain the toxins at just a single site?	Comment noted.
21			12. Have you considered that Operating Industries Landfill in this County has already spent over \$1100 million in post-closure expenses, and it's far from over?	Comment noted.
22			13. Your Countywide Summary Plan includes praiseworthy recycling and education efforts. Why not put more emphasis in those areas? It's likely to generate far more public support.	Consistent with State law, the CSE deals with disposal issues only. Please refer to Topical Response #1.
23			14. In your DEIR under Alternatives Section on page 8-2 you state, "Since the County is mandated by State law to prepare the CSE, no other alternative is considered feasible to attain the objective of this project. As such, none will be considered." Are you dismissing viable and environmentally superior alternatives to siting dumps?	The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE. However, no other alternatives were discussed in the DEIR because State law requires the preparation of the CSE and there are no other feasible projects that can attain the objectives of the CSE. Please refer to Topical Responses #1 and #8.

**Table B-1
Summary of Oral Comments Received During Public Information Meetings
on the Los Angeles County Countywide Siting Element**

COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
24			15. Are you actively implementing more of such alternatives now so that the remaining landfill space -- at conservative estimates, at least 15 years' worth -- can be utilized far effectively?	Please refer to Topical Responses #2, #3, #14.
25	4/2/96	Susan Crawford Vila LASER	16. Wouldn't those 15 years of available dump space satisfy the requirements of AB939 that you're trying to address with these documents?	Please refer to Topical Response #1.
26			17. Are you considering that the City of Los Angeles is implementing numerous measures to cut their waste stream by 70% by the year 2020?	Comment noted. Please refer to Appendix I-D, response to the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County," dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 4 and Topical Responses #1 and #9.
27			18. Have you taken fully into account the effect on the waste stream that recycling of green waste, glass, plastics, metals, building materials, and mixed paper recycling has on the waste stream?	This comment is beyond the scope of the CSE. Please refer to the Summary Plan.
28			19. Did you consider new and existing technologies such as the Bedminster Bioconversion system and its effects on the waste stream?	New and existing alternative technologies have been reviewed and considered. Please refer Topical Responses #2 and #14.
29			20. Have you considered the EPA mandate to reduce methane gas emitted by landfills?	This comment is beyond the scope of this document. The CSE serves as a policy manual rather than a specific development program.
30			21. Why do your population projections not reflect the genuine shrinkage of growth in L.A. County over the last 10 years?	This document uses the best available data along with the CIWMB's Adjustment Methodology in projecting waste generation. Please refer to Topical Response #9.
31			22. Did you take into account the effect on the waste stream of the diversion of waste to Orange County, the result of recent contract negotiations?	Diversion of waste to Orange County has been considered and is among the List of alternative sites for disposal. See Chapter 9, page 9-4, section 9.3 and Topical Response #3.
32			23. Are you ignoring overtures from Riverside County and other locations out of County and out of State for dump sites?	Rail-haul to Riverside County, other out of County locations, and out of State locations have been considered as probable alternatives. See page 8-6, section 8.5 and Topical Response #3.
33			24. Why do you use that ridiculous we won't let LA be held hostage' argument?	Please refer to topical response #1.
34			25. Don't your "shortfall" and "excess capacity" tables indicate that with the advent of alternatives, there is no need for new landfills?	Please refer to Topical Response #9.

**Table B-1
Summary of Oral Comments Received During Public Information Meetings
on the Los Angeles County Countywide Siting Element**

COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
35			26. Do you consider that "disposal capacity" does not have to mean "landfill capacity," that MRF's and the like should be taken into account?	State law (Section 40120.1 of the Public Resources Code) defines disposal as "the management of solid waste through landfill disposal or transportation at a permitted solid waste facility." Therefore, under the current law, the only disposal alternatives to landfills are transformation facilities. Please refer to Topical Responses #1 and #14.
36	4/2/96	Susan Crawford Vila LASER	27. Are you trying to create a scenario to justify the siting of Elsmere to somehow override the National Forestry Department?	Elsmere Canyon landfill will remain in the document unless the project proponent withdraws the project from consideration by the County. The project as presently proposed cannot be built due to the restrictions on the use of the National Forest land. Federal law (Public Law 104-333, the Omnibus Public Land Bill of 1996, Section 812) now prohibits the siting of a solid waste landfill in the portion of the project area within the Angeles National Forest. However, a scaled-down project is currently being considered by the project proponent for the portion of the property outside the Angeles Forest Boundary. Please refer to Topical Response #6.
37			28. You mention, among others, the possibility of expanding Waste Management's Lancaster facility. Are you aware that the company publicly admits they have to monitor an uncontrollable toxic plume that's flowing out into the desert? Do you know you have only to drive by on any one of our many windy days to see massive amounts of litter scattered all over the desert well beyond the dump? Do you know the last cell they dug they hit water table, and they've used that cell for garbage anyway?	The CSE identifies proposed landfill expansions in response to the requirements of State law. Expansion of these sites will assist jurisdictions in Los Angeles County in addressing their disposal needs for the next 15 years. Because of their current operation, these sites generally experience fewer difficulties with regard to consistency with the local jurisdiction's general plan. Ultimately, the determination of consistency rests on the local governing body having jurisdiction over local land use. Expansion of existing landfills have the advantage of an existing transportation infrastructure and less significant potential environmental impacts compared to new landfills. Please refer to Topical Responses #6, #8, and #12.
38			29. Are you aware that we know every single dump in the county has violations, health hazard issues, leakages, close proximity to populations and water supplies, and sundry other negative impacts on people and the environment?	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses. See topical response #8 and #11.
39			30. Browning Ferris Industries predicted panic and garbage in the streets if Sunshine were closed. Do you recall that nothing whatsoever happened; in fact, no one needed that dump then and now?	Comment noted.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
40			31. Do you really not care that the companies you're dealing with have extremely unsavory connections, not to mention public reputations for being very bad at what they are being paid large sums of money to do?	Comment noted.
41	4/2/96	Zona Myers Citizen	1. The system of notification has failed. Rosemond County knew nothing of this meeting. There are other areas in the unincorporated area that do not take our local paper and again they would have no way of knowing about this. In view of this inadequate response, I think the meeting should be rescheduled.	This comment is noted. Please refer to Topical Response #7.
42			2. Questions whether the sample questions on the Siting Element and Summary Plan handouts are a true reflection of these documents or are they indeed samples.	The fact sheet handouts are a true reflection of these documents.
43	4/2/96	Susan Crawford Vila LASER	1. Am I given to understand in your response to her question that you're saying that the preparation of the document has an environmental impact?	Please refer to Topical Response #8.
44			2. Questions if the design of the project has no environmental impact but upon its implementation, it will have an environmental impact.	Please refer to Topical Response #8.
45	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.	In accordance with CEQA, environmental documents only need approval by the governing body of the Lead Agency, i.e. the County Board of Supervisors.
46	4/2/96	Susan Crawford Vila LASER	1. Questions that when any of the 88 cities do not respond in the negative to the proposed documents that a non response is taken as an affirmative.	This is in accordance with Section 41721 of the California Public Resources Code (PRC).
47			2. Questions if this is how the State Law is written or if this is how Los Angeles County interprets it?	Refer to Section 41721 of the California PRC.
48	4/2/96	Zona Myers Citizen	Questions what the County declares as a state of emergency and what is to prevent the City or County of Los Angeles from passing an urgency ordinance due to the garbage crisis and time to crisis analysis.	This comment is beyond the scope of the CSE.
49	4/2/96	Susan Crawford Vila LASER	Questions the need to consider siting of more landfills with the impending opening of Sunshine and its proposed 100 years of capacity.	Please refer to Topical Responses #6 and #9.
50	4/2/96	Zona Myers Citizen	The City of Rosemond is unaware of the facility, "Cal Systems, Cal Blend Composting," which is listed as operating in a confidential area of Rosemond. Identify this confidential location.	

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51	4/3/96	RK Brown Citizen	What is the notification period for the DEIR and legal requirements to make these available on freely accessible basis?	<p>In accordance with the California Environmental Quality Act, pursuant to Public Resources Code Section 2100 et seq., the Los Angeles county Department of Public Works, acting as the lead agency, circulated the Preliminary Draft CSE and the Draft Environmental Impact Report for a 45-day review and comment period effective March 11, 1996.</p> <p>Copies of these documents were distributed to interested parties, the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, all 88 cities in the County, special districts, State agencies, and environmental groups. The documents were also provided to public libraries throughout the County, and made available at the Department's Headquarters building and our Building and Safety District Offices throughout the County.</p> <p>Please refer to Topical Response #7.</p>
52	4/3/96	Emily L. Penfield President of League of Women Voters	We strongly support preservation of open space and natural environment. We need to reduce waste. County needs to explore alternate waste disposal systems.	<p>State law (Section 40120.1 of the Public Resources Code) defines disposal as "the management of solid waste through landfill disposal or transformation at a permitted solid waste facility." Therefore, under the current law, the only disposal alternatives to landfills are transformation facilities.</p> <p>Please refer to Topical Responses #1, #2, #3, and #14.</p>
53	4/3/96	Betsy Landis Waste Management Task Force	Unable to find documents in the city hall at information desks.	<p>Copies of these documents were distributed to interested parties, the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, all 88 cities in the County, special districts, State agencies, and environmental groups. The documents were also provided to public libraries throughout the County, and made available at the Department's Headquarters building and our Building and Safety District Offices throughout the County.</p> <p>Please refer to Topical Response #7.</p>
54	4/3/96	Giancarlo Massarotto City of West Covina	AB 939 is written for nothing but to increase paperwork. A former mayor stated it did nothing but create jobs. These are unnecessary documents. You could just write something simple like separate recyclables from non recyclables. Six years later you're still doing paperwork. Law enacted because of crisis. It should be illegal to throw stuff away. To much bureaucracy, take trash to nearest landfill, be practical. Eagle Mountain is a great solution. Packaging needs to be changed.	<p>Comment noted.</p>

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
55	4/4/96	Carl Boyer Mayor of the City of Santa Clarita	Questions why the County believes that it is more cost effective to promote landfill technology rather than alternative technology, given the approximate \$30 million reportedly spent thus far by BKK to site Elsmere Canyon.	Please refer to Topical Responses #2, #3, #5, and #14.
56	4/4/96	Jeff Kolin Deputy City Manager of the City of Santa Clarita	1. Questions why the draft Siting Element continues to promote policy and strategies which state, that "the County will assist the project proponents to expedite the permitting and development of in-county landfills," yet identifies no strategy, no option, no policy recommendations for securing disposal capacity in existing landfills in adjacent counties, although these landfills have historically low tipping fees now, and are inviting bids for long-term contracts. 2. Questions if the Siting Element is concerned with the cost of trash disposal and its economic impacts or if it is simply a document that is perpetuating an existing system established to plan, site, and operate county landfills.	Please refer to Topical Response #10. Please refer to Topical Responses #1 and #9.
57				
58	4/4/96	Dick A. Unger Newhall County Water District Board Member	Questions why the document does not address the potential for groundwater contamination and its risk assessment and clean-up cost liability.	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.
59	4/4/96	Ed Dunn President of the Board of the Newhall County Water District	1. Questions whether the City of Los Angeles and the County of Los Angeles will guarantee the Santa Clara River Valley a reliable water supply if the Santa Clara River watershed and aquifer is contaminated by the Elsmere Canyon Landfill.	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.
60			2. Questions the origin of the water supply if the Santa Clara River watershed and aquifer are contaminated.	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.
61	4/4/96	Cameron Smyth Representative for Assemblyman William J. "Pete" Knight	1. Questions why the County does not address the effects on recycling incentives of providing new landfills in the County? 2. Questions why the County does not address the potential of introducing variable can rates in the unincorporated areas as a Countywide policy goal to help finance compliance with AB 939?	Consistent with State law, the CSE deals with disposal issues only. Please refer to Topical Responses #1 and #10.
62				
63	4/4/96	Robert C. Sagehorn General Manager of the Castaic Lake Water Agency	1. Requests the County to look at the ultimate cost of landfill clean-up.	Consistent with State law, the CSE deals with disposal issues only. Please refer to Topical Response #1. This comment is beyond the scope of the CSE. The CSE serves as a policy manual rather than a specific development program. Closure and post closure maintenance is addressed in Article 3.3, Section 18230 of the CCR.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
64			2. Requests the County to look seriously at alternatives that would take the material to sites farther away.	The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE.
65	4/4/96	Marsha McLean President of the Santa Clarita Valley Canyons Preservation Committee	Questions what the County will do when there aren't any new potential landfill sites in-county.	The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE. Please refer to Topical Response #3.
66	4/4/96	Barbara Dore President of the Valencia Industrial Association	Questions whether the County will publish a definitive analysis of the costs and benefits of the alternatives to landfill disposal (source reduction and recycling).	Source reduction and recycling are beyond the scope of the CSE. Consistent with State law, the CSE deals with disposal issues only. Please refer to Topical Response #1.
67	4/4/96	Allan Cameron Co-chairman of Landfill Alternatives Save Environmental Resources (L.A.S.E.R.)	Questions what the true cost of landfilling will be after the 30 years required by State and the responsible party for payment of these fees.	This comment is beyond the scope of the CSE. Closure and Post Closure Maintenance is addressed in Article 3.3, Section 18230 of the CCR.
68	4/4/96	Ruth Griffin President of Val Verde Civic Association	Comments regarding the economic advantages of viable alternatives. When resources are depleted, are we going to pay someone to mine the resources that we dispose in landfills?	Please refer to Topical Response #14.
69	4/4/96	Manuel Grace Vice-President and Environmental Counsel of the Walt Disney Company	Request that the Elsmere Canyon Landfill be deleted from the list of approved sites to remain consistent with the Siting Elements policies to protect the well-being of Los Angeles County as the Golden Oak Ranch provides jobs and generates money for the community.	Elsmere Canyon landfill will remain in the document unless the project proponent withdraws the project from consideration by the County. The project as presently proposed cannot be built due to the restrictions on the use of the National Forest land. Federal law (Public Law 104-333, the Omnibus Public Land Bill of 1996, Section 812) now prohibits the siting of a solid waste landfill in the portion of the project area within the Angeles National Forest. However, a scaled-down project is currently being considered by the project proponent for the portion of the property outside the Angeles Forest Boundary. Please refer to Topical Response #6.
70	4/4/96	Kaye R. McCown Canyon Preservation Committee	Comments regarding the importance of the water supply.	Comment noted.
71	4/4/96	Michelle Hoffman Canyon Preservation Committee	1. In reference to the slide in the presentation of the illegally dumped trash in the desert, what in that slide could not be recycled? 2. Instead of spending time siting landfills, why is the County not out finding markets for recyclables?	Comment noted. Recycling is beyond the scope of the CSE. Please refer to Topical Response #1. Consistent with State law, the CSE deals with disposal issues only. Please refer to Topical Response #1.
72				

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73	4/4/96	Michael Kotch Santa Clarita Organization for Planning the Environment (S.C.O.P.E.) and Elected Director of the Newhall County Water District	1. Comment regarding further investigation of the development of transformation facilities as the two in Los Angeles County have demonstrated themselves to be economically viable and the County should look at this technology further.	Please refer to Topical Response #14.
74			2. Comment regarding the addition of the Angeles National Forest Plan with the other jurisdictional general plans as a condition for conformance of consistency in the Siting Element.	The CSE provides a description of the areas and strategies that may be used to address the State mandates for adequate transformation or disposal capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program. As such, the EIR is not intended to provide detailed information on impacts and mitigation measures for the siting of the solid waste disposal/transformation facilities listed. Please refer to Topical Responses #1 and #12.
75			3. Comment regarding remaining significant impacts and growth inducing impacts listed in the draft EIR for the CSE.	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.
76	4/4/96	Cynthia Neal Harris Santa Clarita Oak Conservancy	1. Request for an extension of the review period.	In accordance with the California Environmental Quality Act, pursuant to Public Resources Code Section 2100 et seq., the Los Angeles county Department of Public Works, acting as the lead agency, circulated the Preliminary Draft CSE and the Draft Environmental Impact Report for a 45-day review and comment period effective March 11, 1996. The official review and comment period ended on May 1, 1996. However, due to public requests, the review and comment period was extended for 45-days ending June 17, 1996. The public review and comment period was subsequently extended for an additional 90 days ending October 17, 1996. Please refer to Topical Response #7.
77			2. Questions if the ISA value will be applied to the oak trees in Elsmere Canyon.	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.
78			3. Questions where will the replacement oak trees be placed.	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.
79			4. When can we expect to see a forest not only in Elsmere, but all the other sites?	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.

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80	4/4/96	Henry Schultz Chairman of Santa Clarita Valley Sierra Club	Comments regarding the DEIR of the CSE and the impact on wetlands in particular	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.
81	4/4/96	Karen Pearson Santa Clarita Valley Sierra Club	Yielded to the next speaker.	Comment noted.
82	4/4/96	Skip Newhall	Comment regarding the addition of more alternatives to landfill disposal in the CSE	The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE.
83	4/4/96	Joseph Cota Engineering Geologist	1. Comment regarding extension of the review period.	In accordance with the California Environmental Quality Act, pursuant to Public Resources Code Section 2100 et seq., the Los Angeles County Department of Public Works, acting as the lead agency, circulated the Preliminary Draft CSE and the Draft Environmental Impact Report for a 45-day review and comment period effective March 11, 1996. The official review and comment period ended on May 1, 1996. However, due to public requests, the review and comment period was extended for 45-days ending June 17, 1996. The public review and comment period was subsequently extended for an additional 90 days ending October 17, 1996. Please refer to Topical Response #7.
84			2. Comments regarding May 4 and May 18, 1995, letters by Harry Stone about the geology of Elsmere Canyon.	This comment is beyond the scope of the CSE. The CSE serves as a policy manual rather than a specific development program. Please refer to Topical Response #1.
85	4/4/96	Mary Merritt	Comments regarding importance of recycling.	Recycling is beyond the scope of the CSE. Consistent with State law, the CSE deals with disposal issues only. Please refer to Topical Response #1.
86	4/4/96	Joan Dunn	1. Questions if the County will pledge to revise its goals and policies to encourage the procurement of recycled products to encourage development of markets for recyclables.	This comment is beyond the scope of the CSE. Consistent with State law, the CSE deals with disposal issues only. Please refer to Topical Response #1.
87			2. Questions the amount of recycled product that the County has actually purchased thus far.	This comment is beyond the scope of the CSE. Consistent with State law, the CSE deals with disposal issues only. Please refer to Topical Response #1.

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88	4/4/96	Unknown (The writing on the speaker card is illegible and he does not identify himself on the tape.)	1. Questions why Los Angeles County accepts waste from other counties but refuses to use out-of-county capacity themselves.	Please refer to Topical Response #3.
89			2. Questions why a National Forest which has been protected for 100 years is finding its way to a landfill list	Please refer to Topical Response #6.
90	4/4/96	Unknown (The writing on the speaker card is illegible and he does not identify himself on the tape.) (cont'd)	3. Questions why the City of Los Angeles shows such a disregard for our local water source.	The CSE provides a description of the areas and strategies that may be used to address the State mandates for adequate transformation or disposal capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program. As such, the EIR is not intended to provide detailed information on impacts and mitigation measures for the siting of the solid waste disposal/transformation facilities listed. Please refer to Topical Response #1.
91	4/4/96	Lynne Plambeek Chair of L.A.S.E.R.	1. Comment that the Negative Declaration is not the proper environmental document for the Countywide Integrated Waste Management Plan which includes the Countywide Siting Element.	The environmental document prepared for the CSE is the EIR. The Negative Declaration is the environmental document prepared for the Summary Plan. The CSE and the Summary Plan are two separate documents and should be considered as such.
92			2. Comment that the Countywide Siting Element focuses primarily on landfills as the method of disposal. The CSE should consider other alternatives as methods of disposal.	State law (Section 40120.1 of the Public Resources Code) defines disposal as "the management of solid waste through landfill disposal or transformation at a permitted solid waste facility." Therefore, under the current law, the only disposal alternatives to landfills are transformation facilities. Please refer to Topical Responses #1 and #14.
93	4/4/96	Don Maillally Santa Clarita Woodlands Park Committee	Comment regarding the wealth of resources contained in landfills and the possibility of mining closed landfills for their resources and reusing their renewed capacity	Please refer to Topical Response #2.
94	4/9/96	RK Brown Coalition of West Covina Homeowners	1. Where is the data on odors?	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.
95			2. Where is the history of leachate leakage from LA County Landfills?	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
96			3. Where is the data on evacuation of homeowners due to methane migration from landfills such as BKK?	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.
97			4. What about alternate technologies?	See Chapter 5 of the Final CSE. Also, refer to Topical Responses #2 and #14.
98	4/9/96	Mary Johnson League of Women Voters	What about waste to energy facilities?	The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE and Topical Response #14.
99	4/9/96	Carolyn Besnyl League of Women Voters	What is the time line for public comments and final adoption on Draft Summary? Are these public hearings the only ones or will there be others?	In accordance with the California Environmental Quality Act, pursuant to Public Resources Code Section 2100 et seq., the Los Angeles County Department of Public Works, acting as the lead agency, circulated the Preliminary Draft CSE and the Draft Environmental Impact Report for a 45-day review and comment period effective March 11, 1996. The official review and comment period ended on May 1, 1996. However, due to public requests, the review and comment period was extended for 45-days ending June 17, 1996. The public review and comment period was subsequently extended for an additional 90 days ending October 17, 1996. Please refer to Topical Response #7.
100	4/9/96	Diana Kelly League of Women Voters	Communities today decide their programs for trash and recycling. Today supervisors said it should be handled regionally. Do you see the County regulating in the future and not the local communities?	In Los Angeles County there is no direct regulation on the flow of the wastestream on a county wide basis due to the free enterprise system that exists. Therefore, the County does not exercise any control over the flow of waste. Recent Court decisions have restricted the authority of local jurisdictions to pass ordinances regulating the flow of wastes within their boundary. Please refer to Topical Response #3.
101	4/10/96	Damian Durrant Save Your Forest Coalition	I would like to ask the question that, of the top ten or twelve environmental groups, perhaps you could name which of these serve on the Task Force	The structure and composition of the Task Force is mandated by State law. Environmental Organizations are represented.
102	4/10/96	Jeff Yann Hacienda Heights Improvement Association/LASER	1. I want to know why the county is not taking a proactive approach to conserve in-county landfill space and provide aggressive leadership in pursuing non-landfill alternatives in non-polluting waste-to-energy gasification?	The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE and Topical Responses #1 and #14.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
103	4/10/96	Jeff Yann Hacienda Heights Improvement Association/LASER (cont'd)	2. Why does the county seem to be punishing communities like Hacienda Heights, promoting landfill-based objectives of the Sanitation Districts?	The CSE provides a description of the areas and strategies that may be used to address the State mandates for adequate transformation or disposal capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program. To achieve the disposal capacity objectives, the CSE establishes a planning mechanism, not a landfill building program, which would facilitate the provision of a minimum of 15-years of disposal capacity on a continuous basis through landfills, transformation facilities, or any combination of these. This planning mechanism would include determination of future disposal needs, identification of potentially suitable sites, establishment of siting criteria each site must meet, and providing assistance/support to project proponents through the permitting process. Please refer to Topical Responses #1 and #6.
104			3. Why aren't remote disposal alternatives evaluated on the basis of an apples to apples cost comparison?	Please refer to Topical Response #3.
105	4/10/96	Mike Lewis Alliance For Innovative Resource Management	Following my presentation tonight are a number of like-minded individuals who join me in challenging many of the assumptions that went into the preparation of the document you have released to the public.	Comment noted.
106			Assumption number one: county lines are sacred, impassable barriers for solid waste. We have regional solutions in this community for air pollution, for water, distribution, for airports, for highways, for commuter rail, for flood control, and no where is it mandated as you would have us believe in this plan that 15 years, or 50 years, for that matter, of trash has to be buried within the county boundaries.	Please refer to Topical Responses #1 and #5.
107			Assumption number two: in preparing this document, you have followed the spirit, the intent and the letter of AB 939. It was the spirit of the law to pursue a hierarchy of waste disposal priorities, for which landfilling is the last priority. You do not even list those priorities in your document. The intent was to promote safe and efficient alternatives to landfilling. You give them only cursory mention. And the letter was that you must plan for that waste which cannot be recycled, reduced or composted. Your plan anticipates landfilling fifty percent of all the waste generated in the county, whether or not it can be recycled, reduced, or composted. As a consequence, it is possible that you have over estimated the need for landfill capacity by as much as fifty percent, not to mention the fact that you may have violated the law.	Please refer to Topical Response #1.

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108			Assumption number three: that the outdated and irrelevant 1988 Action Plan can be resuscitated by including references to it in this plan. This new plan should really be based on today's realities and not the nostalgia of an eight-year old four-page memo.	Please refer to Topical Response #13.
109	4/10/96	Mike Lewis Alliance For Innovative Resource Management (cont'd)	Assumption number four: There is a trash crisis. If you believe there is a crisis in three years, as your document would indicate, then your plan does not have a solution that can be achieved in that same time frame.	Please refer to Topical Response #9.
110			1. How can we, working together, recycle this document into the kind of leading edge, visionary master plan that anyone else in the country would expect from the largest county in the nation?	Comment noted.
111	4/10/96	Joan Edwards Citizen	1. The method of calculating future waste generation uses a methodology that tends to produce larger growth than likely. Both the California EPA and CIWMB have documented that per capita waste generation is decreasing. L.A. County, in particular, has demographics that indicate a slowing of per capita waste generation even with economic recovery due to the influx of lower income residents, changing ethnicity, a trend towards business growth that is concentrated in the northern area of the county where there is a particular availability of landfill capacity. In contrast, your documents are showing waste generation increasing over your previous documents and projections.	This document uses the best available data along with the California Integrated Waste Management Board's Adjustment Methodology in projecting waste generation. Please refer to Topical Response #9.
112			2. Our landfills are currently utilizing less than full capacity, and there is a likelihood, that even with the closing of two landfills, that many of the landfills will likely be used at less than full capacity.	Please refer to Topical Response #9.
113			3. I believe the documents have underestimated diversion potential. For example, they assume we will achieve 50 percent recycling by the year 2000, and that for the subsequent 50 years there will be no increase in technology markets. That is highly unlikely. The City of Los Angeles has clearly stated in both of their documents that they intend to reach a 70-percent diversion rate by the year 2020. That calculation is not included in your projections.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 4. Also, refer to Topical Responses #1, #2, #5, and #14.
114			4. The recommendations of the state capacity study for setting priorities when planning priorities for new landfill capacities were not followed.	Please refer to Topical Response #1.

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115			5. The potential for utilizing in-county inert disposal capacity was underestimated. All of the inert landfills have not been listed, and they have substantial capacity. In fact, the percentage of inerts in Class III landfills during 1990 was substantial.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 3. Also, refer to Topical Responses #1 and #9
116	4/10/96	Joan Edwards Citizen (cont'd)	6. The potential for dealing with the upswing in economic recovery through special plans for recycling of construction debris as the City of Los Angeles did so successfully with your assistance during the Northridge earthquake was ignored or underestimated.	The comment is beyond the scope of the CSE. Please refer to Topical Responses #1 and #9.
117			7. The Summary Plan notes that Los Angeles County is the largest employer in the county. What are the total tonnages that are disposed by all county departments and agencies, and the aggregate percentage diversion rates for that waste generated?	
118	4/10/96	Dave Johns Citizen	Why doesn't the Siting Element include a mandatory distance requirement of several miles between landfills and important groundwater aquifers?	The CSE provides a description of the areas and strategies that may be used to address the State mandates for adequate transformation or disposal capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program. Please refer to Topical Response #1.
119	4/10/96	Barbara Fish Hacienda Heights Improvement Association	1. Who is going to force the issue of rail haul?	Forcing the issue of rail haul is beyond the scope of this project, however, the final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE and Topical Responses #3 and #14.
120			2. Where does the policy of viewing out of County disposal as supplement for in County disposal capacity in the event that anticipated in County capacity is not attained or as a means to extend the life of in County landfills come from. Does it make sense today?	Please refer to Topical Response #1.
121			3. In the Siting Element there is a deficiency in Chapter 8 which is most revealing. It refers to a quote "detailed description of out of County disposal alternatives that are currently available or may be available in the future." And it refers you to Chapter 8. The reader finds in Chapter 8 there is no actual detailed discussion and it just states that there are no alternatives. Why is it when we really need to know something it's not there?	Comment noted. The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE and Topical Responses #1 and #14.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
122	4/10/96	Jay Anderson Hacienda Heights Improvement Association	The Countywide Siting Element says that goals and policies are being implemented to meet AB 939 and that they are consistent with the 1988 Action Plan. Why? There's no need to include them, AB 939 does not require it. Why is the Action Plan so dominant in this document. Why don't you delete it so that we can start from a level playing field?	Please refer to Topical Responses #1 and #13.
123	4/10/96	Stephanie Carter Hacienda Heights Improvement Association	Despite all the 50 percent recycling alternatives, 50 percent still becomes 50 percent until it is indeed 100 percent. What are we going to do then when there is really no more room left and our water is contaminated and looking back, would Puente Hills fit the CSE criteria?	The CSE provides a description of the areas and strategies that may be used to address the State mandates for adequate transformation or disposal capacity during a 15 year planning period. Puente Hills Landfill is in the CSE.
124	4/10/96	Tom Kelleher Hacienda Heights Improvement Association	Will the County show its absolute commitment to AB 939 hierarchy to expanding its diversion efforts and by revising the documents accordingly?	Please refer to Topical Response #1.
125	4/10/96	Lynn Yann Hacienda Heights Improvement Association	1. Why doesn't Los Angeles County, which has so many more landfills than Alameda County, explicitly address long term costs from its landfills.	This comment is beyond the scope of the CSE. Please refer to Topical Responses #1 and #5.
126			2. What does Alameda County know that we don't?	Comment noted.
127			3. What independent analysis have been done by Public Works of long-term costs?	This comment is beyond the scope of the CSE. Please refer to Topical Responses #1, #5, and #9.
128			4. Where are real life cycle costs identified?	This comment is beyond the scope of the CSE. Please refer to Topical Responses #1, #5, and #9.
129			5. Who pays them?	Comment noted.
130			6. Who is paying them on operating industries?	Comment noted.
131			7. Why hasn't Los Angeles County published a program cost guide so that we can all see how the costs were considered in concluding that all these new and expanded landfills are going to be cost effective?	This comment is beyond the scope of the CSE. Please refer to Topical Responses #1 and #5.
132	4/10/96	Bob Isaacson Citizen	1. Why doesn't the county follow the law, the right priorities?	Please refer to Topical Response #1.
133			2. What is going to happen when every square inch of land is filled?	Comment noted

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
134			3. Whatever you're going to do then, in 20, 50, or 100 years, why not do it now?	Comment noted. Please refer to Topical Response #1.
135			4. Why not put the trash on a barge and send it out to the sea where it can be safely incinerated.	Comment noted.
136	4/10/96	Bob Isaacson Citizen (cont'd)	5. Why don't we dig a tunnel out to the desert out and move garbage on seawater out there where we can use the energy we burn to desalinate?	Comment noted.
137	4/10/96	Louis Petrelli Citizen	I was part of the Master Composting Program that L. A. County had and they've terminated it. Yet you're saying that composting is going to be one of the major means of getting rid of green waste and brown waste?	Composting is beyond the scope of the CSE. Please refer to Topical Response #1.
138	4/10/96	Barbara Fish Hacienda Heights Improvement Association	Who is going to give the leadership and force waste by rail?	Forcing the issue of rail haul is beyond the scope of this project, however, the final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE and Topical Responses #1 and #14.
139	4/10/96	Bob Issacson Citizen	1. Why don't we have recommendations in here to charge for garbage disposal by the pound?	This comment goes beyond the scope of the CSE. Please refer to Topical Response #1.
140			2. Why don't we have a law or even a program encouraging people to plant material that is drought resistant which reduces the amount of green waste?	This comment goes beyond the scope of the CSE. Please refer to Topical Response #1.
141	4/10/96	Jay Anderson Hacienda Heights Improvement Association	I want to know why the County isn't taking advantage of that monopoly, the County containing all of the landfills and the City having all the trash, in landfill space to do something that would be progressive in helping to get rid of the burdens that my neighbors are bearing?	Comment noted.
142	4/11/96	Supervisor Zev Yaroslavsky	Comments on the siting of a potential landfill in the Mission Rustic/Sullivan Canyons	Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System. Please refer to Topical Response #6.
143			1. He is "disturbed and shocked that [the issue of Mission/Rustic-Sullivan Canyons Landfill] . . . is back on the table for discussion."	Comment noted.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
144			2. The City of Los Angeles is not going to approve the conditional use permit for the Mission/Rustic-Sullivan Canyons Landfill.	Comment noted.
145			3. The traffic generated by a landfill will adversely impact the community.	Comment noted.
146	4/11/96	Supervisor Zev Yaroslavsky (cont'd)	4. "How does placing a landfill site in this location, comport with the decisions that the public sector has made about the future preservation of the Santa Monica Mountains?"	Comment noted.
147			5. The placement of a landfill in the middle of a national or regional park system is not feasible.	Comment noted.
148			6. Why does the County want to have another "brouhaha, another knockdown, drag out between the City and the County where we are shutting out each other from landfill sites."	Comment noted.
149	4/11/96	Los Angeles City Councilman Marvin Braude	Comments on fighting any potential landfills sited for Mission Canyon or Rustic Canyon.	Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System.
150			1. "There will never be a dump in Mission Canyon or Rustic Canyon."	Please refer to Topical Response #6. Comment noted.
151			2. The County is not fulfilling their fiduciary responsibility of providing "reasonable" alternatives.	Comment noted.
152	4/11/96	Jeff Seymour Alliance for Innovative Resource Management	1. Question regarding manner in which the County notified the public and private sector regarding the release of the subject documents.	In accordance with the California Environmental Quality Act, pursuant to Public Resources Code Section 2100 et seq., the Los Angeles county Department of Public Works, acting as the lead agency, circulated the Preliminary Draft CSE and the Draft Environmental Impact Report for a 45-day review and comment period effective March 11, 1996. Please refer to Topical Response #7.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
153			2. Question regarding who received the subject documents and how.	Copies of these documents were distributed to interested parties, the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, all 88 cities in the County, special districts, State agencies, and environmental groups. The documents were also provided to public libraries throughout the County, and made available at the Department's Headquarters building and our Building and Safety District Offices throughout the County. Please refer to Topical Response #7.
154			3. Question regarding the dates for the public information meetings coinciding with the first and last day of the Passover Holiday.	Comment noted.
155	4/11/96	Jeff Seymour Alliance for Innovative Resource Management (cont'd)	4. Question regarding the number of days each newspaper advertised the public notices.	Please refer to Topical Response #7.
156	4/11/96	Allen Camron L.A.S.E.R and S.C.O.P.E	1. Mission/Rustic-Sullivan Canyons should not be designated as a potential landfill.	Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System. Please refer to Topical Response #6.
157			2. Landfilling should not be considered as an option because it is the most expensive and least effective method of dealing with solid waste.	Please refer to Topical Responses #1 and #2.
158			3. Why are landfill alternatives not properly discussed in the subject documents?	The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE. Also, refer to Topical Responses #2, #3, #5, and #14.
159			4. What is the "true" cost of landfilling (i.e., liability, groundwater cleanup, air pollution management, and site management)?	This comment is beyond the scope of the CSE. The CSE serves as a policy manual rather than a specific development program.
160			5. What is the "true" cost to recycle?	Recycling is beyond the scope of the CSE. Consistent with State law, the CSE deals with disposal issues only. Please refer to Topical Response #1.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
161			6. Recommends that the County should extend the public review period 120 days beyond the May 1, 1996 deadline. Following this extension, the County should grant an additional 120 days to allow the general public to submit written comments.	In accordance with the California Environmental Quality Act, pursuant to Public Resources Code Section 2100 et seq., the Los Angeles County Department of Public Works, acting as the lead agency, circulated the Preliminary Draft CSE and the Draft Environmental Impact Report for a 45-day review and comment period effective March 11, 1996. The official review and comment period ended on May 1, 1996. However, due to public requests, the review and comment period was extended for 45-days ending June 17, 1996. The public review and comment period was subsequently extended for an additional 90 days ending October 17, 1996. Please refer to Topical Response #7
163	4/11/96	Marsha McLean Santa Clarita Valley Canyons Preservation Committee	1. Why doesn't the County, in coordination with the Cities, consider establishing a variable-can rate system, since 65 cities want to adopt it and it has been seven years since the passage of AB 939?	This comment is beyond the scope of this project.
164	4/11/96	Marsha McLean Santa Clarita Valley Canyons Preservation Committee (cont'd)	2. The County should make variable-can rates and other source reduction methods a Countywide priority to reflect the hierarchy of AB 939.	This comment is beyond the scope of this project.
165	4/11/96	Louise Frankel Mission Canyon Coalition	1. The traffic generated by a landfill will adversely impact the community.	Comment noted, however, the CSE provides a description of the areas and strategies that may be used to address the State mandates for adequate transformation or disposal capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program. As such, the EIR is not intended to provide detailed information on impacts and mitigation measures for the siting of the solid waste disposal/transformation facilities listed. Please refer to Topical Response #1
166			2. The methane gas being generated from the previous landfill in Mission/Rustic-Sullivan Canyons has created numerous fires and caused the abandonment of real property on the periphery of the site.	Comment noted. Please refer to Topical Response #6
167			3. When the CSD first gained access to Mission Canyon, they agreed that after the closure of the Landfill, it would become a park.	Comment noted.
168	4/11/96	Penny Von Kalinowski Mountain Gate Open Space Maintenance Association	Her association is determined to fight the reopening of Mission/Rustic-Sullivan Canyons Landfill.	Please refer to Topical Response #6.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
169	4/11/96	Glenn Bailey Foundation for Resource Conservation	1. The 25% and 50% diversion goals are too low and should be increased to 100%.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 4 and Topical Response #1.
170			2. The disposal of Plastics #1 thru #6 in landfills should not be allowed.	This comment is beyond the scope of the CSE.
171			3. Landfills should not be called sanitary but, rather, a garbage dump.	Comment noted.
172			4. Blind Canyon is located near the thrust fault that produced the Northridge Earthquake, and the headwaters for the Los Angeles River.	Please refer to Topical Response #6.
173			5. How much money has Waste Management, Inc., BFI, and BKK contributed to politicians?	This comment is beyond the scope of the CSE.
174	4/11/96	Loretta Ditlow Brentwood Hills Homeowners	How can the designation of Mission/Rustic-Sullivan Canyons as a potential landfill site be removed? What is the process?	Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System. Please refer to Topical Response #6.
175	4/11/96	Eric Edmonds Save our Mountains, Inc.	Mission/Rustic-Sullivan Canyons should be eliminated from the list of potential landfill sites.	Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System. Please refer to Topical Response #6.
176	4/11/96	Damian Durrant Save Your Forest Coalition	1. If establishing a Variable Can Rate System in Los Angeles County is difficult, opening a landfill in Mission/Rustic-Sullivan Canyons will prove impossible.	Comment noted.
177			2. In the CSE, why did scenarios "A" and "B" use the assumptions that they did (i.e., a) assuming no new or expanded landfills during the planning period, and b) utilizing existing landfills, and assuming development of all proposed expansions and proposed new sites during the planning period)? Why can't the County use more scenarios (i.e., opening some landfills and not others)?	The revised documents include additional scenarios showing possible combinations. There are an infinite number of possible scenarios some more plausible than others. Each scenario is a speculation as to what may or may not happen. For additional scenarios and original scenarios, See Chapter 4.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
178			3. The County should create several scenarios with the assumption that a recycling rate of 60% or 70% would occur through the year 2010.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 4 and Topical Response #1.
179			4. In 1988, the County said that a disposal crises would occur in 1992, but it did not materialize. Why?	Comment noted.
180			5. With the potential opening of four landfills and six expansions, there would be no incentive for the 88 cities to achieve their diversion goals since their would be plenty of landfill capacity.	Please refer to Topical Response #9.
181	4/11/96	Bryan Gordon Save Our Mountains, Inc.	1. How can the County state that no significant environmental impact would occur as a result of opening a landfill in the Mission/Rustic-Sullivan Canyons?	Comment noted, however, the CSE provides a description of the areas and strategies that may be used to address the State mandates for adequate transformation or disposal capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program. As such, the EIR is not intended to provide detailed information on impacts and mitigation measures for the siting of the solid waste disposal/transformation facilities listed. Please refer to Topical Response #1. Furthermore, Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System. Please refer to Topical Response #6.
182			2. The County should charge residents the "true" cost of disposing their solid waste.	This comment is beyond the scope of the CSE.
183			3. The County should establish a variable-can rate system.	Comment noted. However, this comment is beyond the scope of the CSE.
184			4. The reopening of Mission/Rustic-Sullivan Canyons Landfill will destroy the quality of life in the surrounding communities.	Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System. Please refer to Topical Response #6.
185	4/11/96	Frank Kortum North Valley Coalition	1. Why hasn't the County addressed the issue of true "life cycle" costs for landfilling (i.e., site cleanup, groundwater, and air pollution)?	This comment is beyond the scope of the CSE. Closure and Post Closure Maintenance is addressed in Article 3.3, Section 18230 of the CCR.

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186			2. Why must the 15-years of disposal capacity be located within Los Angeles County?	Please refer to Topical Response #1.
187	4/11/96	Louis Nevell Bel Air Skycrest Property Owners Association	It makes no sense to pursue the siting of Mission/Rustic-Sullivan Canyons Landfill because the residents are opposed to it.	Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System.
188	4/11/96	Irma Dobbyn Tarzana Property Owners Association, Inc.	1. Reseda Boulevard should not become an access road to the proposed Mission/Rustic-Sullivan Canyons Landfill.	Please refer to Topical Response #6.
189			2. The County should educate the business community about recycling.	Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System.
190			3. The County should aggressively look into landfill alternatives.	Please refer to Topical Response #6.
191	4/11/96	George W. Stevenson California Native Plant Society	1. Rustic Canyon is host to some of the most beautiful panoramic views of the City of Los Angeles.	The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE.
192			2. Mission/Rustic-Sullivan Canyons have permanent springs which support riparian plants, maple trees, etc.	Comment noted. Please refer to Topical Response #6.
193			3. A landfill in the Mission/Rustic-Sullivan Canyons would destroy the 55 different types of vegetation found within the canyons.	Comment noted. Please refer to Topical Response #6.
194			4. The Negative Declaration is inadequate when it comes to the issue of siting a landfill in Mission/Rustic-Sullivan Canyons.	Comment noted. Please refer to Topical Response #6.
195	4/11/96	Randy Young Pacific Palisades Community Council	1. Eagle Mountain should strongly be considered as a potential landfill because it's barren and desolate.	Comment noted. Please refer to Topical Response #3.

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196			2. The County should show pictures of the potential landfill sites and not pie charts in its presentation.	Comment noted.
197	4/11/96	Warren Breslow Bel Air Crest Home Owners Association	Because Sepulveda Boulevard is the only ingress and egress from this community, they are prepared to fight the opening of Mission/Rustie-Sullivan Landfill.	Comment noted. Please refer to Topical Response #6.
198	4/11/96	Pat Saletore Citizen	The Summary Plan's Goals, Policies, and Objectives does not adequately reflect the Cities Goals, Policies, and Objectives.	
199	4/11/96	John Richardson Community Recycling and Resource Recovery, Inc.	1. Community Recycling is currently operating a facility that is composting 1,000 TPD in Kern County. The end product is sold to the agricultural community in Kern County.	Comment noted.
200			2. Community Recycling is currently operating a 1,000 TPD mixed-waste processing facility in Sun Valley to process refuse from the multi-family, commercial, and industrial sectors.	Comment noted.
201			3. What is the County doing to encourage the opening of regional mixed-waste processing facilities?	In Los Angeles County there is no direct regulation on the flow of the wastestream on a county wide basis due to the free enterprise system that exists. Therefore, the County does not exercise any control over the flow of waste. Recent Court decisions have restricted the authority of local jurisdictions to pass ordinances regulating the flow of wastes within their boundary. Please refer to Topical Response #3.
202			4. Immediately after the Northridge Earthquake, Community Recycling's C&D Recycling facility in Sun Valley operated in excess of 3,000 TPD.	Comment noted.
203	4/11/96	Margaret Taylor Citizen	1. All 151 sites are unsuitable.	Please refer to Topical Response #6.
204			2. Landfill alternatives should have been actively pursued.	The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE.
205			3. The Board of Supervisors should have been notified earlier concerning the subject documents.	Comment noted.
206			4. Why didn't the County propose a yard waste ban in the Summary Plan?	

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207	4/11/96	Sue Currans Citizen	1. The designation of Mission/Rustic-Sullivan Canyons as a possible landfill site should be dropped from the CSE.	Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System. Please refer to Topical Response #6.
208			2. The draft EIR is woefully inadequate.	Comment noted.
209	4/11/96	Peggy McCain Citizen	1. Did the scenarios in the CSE take into account the projected population increase of 20% by the year 2000.	Please refer to Topical Response #9.
210	4/11/96	Peggy McCain Citizen (cont'd)	2. Did the County know that the U.S.G.S has maps delineating the epicenters of earthquakes, and that the Mission/Rustic-Sullivan Canyons are located directly above an epicenter?	Please refer to Topical Response #6.
211			3. Did the County know that the Santa Monica Mountains ranked 7th in the Modified Mercalli Scale, with 10 being worst?	Comment noted.
212	4/11/96	Michael Lockman Citizen	Mission/Rustic-Sullivan Canyons are not suitable for landfills and should not remain open to the public.	Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System. Please refer to Topical Response #6.
213	4/16/96	Charles J. O'Connell Olive View Neighborhood Watch	1. Having gone through the document and noting that the number of alternative sites were identified in the Elsmere EIS, notice that there were numerous canyons in the San Gabriel mountains to the East and also to the North between New Hall and Palmdale, probably something in the area of fifteen to twenty locations. Few if any of these were identified in the Siting Element. I would like to know if there is a reason for that.	As an element of the Action Plan and as directed by the Board of supervisors, the County Department of Public Works and the County Sanitation Districts of Los Angeles County conducted a preliminary study to identify sites/areas in Los Angeles County which may be potentially suitable for the development of Class III landfills. The study evaluated 101 potential landfill sites within the metropolitan area. Of the 101 initial sites, six were selected as the most potentially suitable for new landfills and for conducting additional detailed studies. The six highest ranking sites were Blind Canyon, Browns Canyon, Elsmere Canyon, Mission/rustic-Sullivan Canyons, Towles Canyon and Toyon II. See page 6-2, section 6.4. However, Mission Rustic and Sullivan Canyons have been removed from the document and the Elsmere Canyon landfill project has been scaled down to reflect the Federal law (Public Law 104-333, the Omnibus Public Land Bill of 1996, Section 812). Please refer to Topical Response #6.

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214			2. Having gone through the EIR very quickly. It didn't appear that the impact of the landfill, I'll call it the livability, environmental element of the communities was addressed in any detail and I would like to know why.	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.
215	4/16/96	Frank Kortua North Valley Coalition	1. The documents that were circulated seemed to indicate that there is plenty of inert waste capacity. Is that an accurate statement?	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 3, Importation/Exportation of Solid Waste.
216	4/16/96	Frank Kortua North Valley Coalition (cont'd)	2. Is the Department of Public Works looking at the issue of whether it will be feasible to require the segregation of the inert materials so that those materials don't go into municipal solid waste landfills and use up the capacity prematurely?	Although this issue is not required to be addressed by this document, there are existing statutes that require separate disposal of solid waste and inert waste in the respective designated disposal sites.
217			3. Is it true that Chiquita Canyon closed down recently (earthquake debris recycling operation)?	No, Chiquita Canyon Landfill is still operating.
218			4. What materials may be used legally as a daily cover now?	Fill dirt, greenwaste, or any other alternative daily cover approved by the Local Enforcement Agency may be used.
219			5. Is it preferable that the landfill operator be required to use soil of own possession for purposes of daily cover as opposed to using inert material or green waste?	Comment noted.
220			6. Are you aware that the Superior Court in Sacramento rejected the efforts of the waste industry to make use of green waste as daily cover?	Comment noted.
221			7. What is the position of Public Works regarding the question of appropriate material as daily cover?	The County does not have the regulatory authority to establish preference for a particular product in a free enterprise system of trade/commerce. The California Integrated Waste Management Board, through the Local Enforcement Agency has the sole authority to approve the use of any form of Alternative Daily Cover Material.
222			8. When you take away this raw material (green waste), doesn't that make it more difficult for those composting markets to develop?	Green waste alternative daily cover provides a beneficial use of green waste which would otherwise be disposed in the landfill. The use of green waste in this manner also contributes to the establishment of the collection infrastructure needed in place for the development of composting facilities. The replacement of green waste with the use of foam as daily cover may cause additional disposal need if adequate composting capacity is not available. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 5.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
223			9. Isn't it true that if you restrict the supply and put all of the green waste into daily cover, that it makes it more difficult for a composting operator to come in and be a viable operator?	See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 5.
224			10. Wouldn't it be preferable to make more of the green waste material available rather than put it on the landfill as daily cover?	See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 5.
225			11. What is the status of the Bio-Gro composting facility?	The comment is beyond the scope of the CSE.
226	4/16/96	Frank Kortua North Valley Coalition (cont'd)	12. Pages 4 through 10 of the County Siting Element talks about adjustment methodology that was used for waste projection. Was this methodology used in the previous County Siting Element back in the 80's?	Please refer to Topical Response #9.
227			13. Specifically how is it better than the previous methodology?	Please refer to Topical Response #9.
228			14. Were there any similar improvements made in methodology regarding landfill capacity?	Please refer to Topical Response #9.
229			15. Were any efforts to determine the existence of an independent study of landfill capacity such as the one which was attempted by the city of Los Angeles at about the same period of time?	The CSE represents the most complete and accurate study of landfill capacity in Los Angeles County.
230			16. Does page 8-2 of the CSE state that we cannot prohibit importation of trash from outside the county because of the Commerce Clause?	Please refer to Topical Response #3.
231			17. Are you aware that the County Counsel has stated that because of what the county's location, being relatively far away from state border, that the Commerce Clause might not prohibit restrictions on importing trash from other counties?	Please refer to Topical Response #3.
232			18. Have you reviewed the County Counsel letter dated September 27, 1994 on this issue of the planning commission?	Comment noted
233			19. Is it your position that the Commerce Clause still applies to Los Angeles County on waste issues?	Please refer to Topical Response #3.
234			20. Do you have any document from the County Counsel on this issue that you can release?	The document in reference can be requested from the Executive Secretary of the Los Angeles County Board of Supervisors.

**Table B-1
Summary of Oral Comments Received During Public Information Meetings
on the Los Angeles County Countywide Siting Element**

COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
235			21. Do you disagree with the County Counsel statement that the county waste management planning should demonstrate whether restrictions on the import of solid waste across the boundaries of the county will have any discernible effect on Inter-state Commerce and whether the restrictions would advance the legitimate local interest?	Please refer to Topical Response #3.
236			22. Do you agree with this statement?	Please refer to Topical Response #3.
237			23. What do you have to demonstrate whether there will be any discernible effect on Inter-state Commerce?	Please refer to Topical Response #3.
238	4/16/96	Frank Kortua North Valley Coalition (cont'd)	25. If the Commerce Clause does apply, how do you manage keeping city trash out of Puente Hills and Calabasas?	Please refer to Topical Response #3.
239			26. Does that prohibition have no effect on their Inter-state commerce?	Please refer to Topical Response #3.
240			27. Did you look at the geological factors for landfills such as Sunshine Canyon or Chiquita Canyon which are highly unstable geological areas?	This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.
241			28. Where in the Siting Element does it show the criteria in which you ruled out some landfills and ruled others in?	The CSE provides a description of the areas and strategies that may be used to address the State mandates for adequate transformation or disposal capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program. As such, the EIR is not intended to provide detailed information on impacts and mitigation measures for the siting of the solid waste disposal /transformation facilities listed. Please refer to Topical Response #1.
242	4/16/96	Nora Schumacher SCAG-District 12 & NVC	1. With all the resources of your department, couldn't you find a site for a public information meeting in the Northeast San Fernando Valley, which is possibly housing some major landfills?	Comment noted.
243			2. Do you think that the proposed policy stated on page 2-3 of the Siting Element favor the expansion of the landfills over alternative waste disposal methods?	Please refer to Topical Response #1.

Table B-1
Summary of Oral Comments Received During Public Information Meetings
on the Los Angeles County Countywide Siting Element

COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
244			3. On the April 4th meeting, several speakers pointed out that creating excess landfill capacity will lead to reduced tipping fees thereby reducing the incentive to recycle. You responded that you are unaware of the significant relationship between cheap landfill rates and incentive to recycle. Do you wish to respond to that?	This comment is acknowledged. Please refer to Topical Response #1 for further discussion.
245			4. Why do you think that it takes 7 to 10 years to develop a landfill site?	Please refer to Topical Response #1.
246			5. When are you going to look at the alternatives instead of siting more landfills?	The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE.
247			6. Why do you rely upon the private sector to do the job of transforming waste via newer alternatives instead of the County taking this responsibility?	Please refer to Topical Response #14.
248	4/16/96	Nora Schumacher SCAG-District 12 & NVC (cont'd)	7. Puente Hills Landfill has the lowest tipping fee around. This only encourages out-of-County waste to come in. These are definite attractions for out-of-County waste aren't they?	Please refer to Topical Responses #3 and #5.
249			8. Will Sunshine take in out-of-County waste?	The CUP does not include any provisions which prohibit out-of-County waste.
250			9. Is your Department prepared to site a waste-to-energy facility?	This comment goes beyond the scope of the CSE. The CSE provides a description of the areas and strategies that may be used to address the State mandates for adequate transformation or disposal capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program.
251			10. Are there any plans to site a waste-to-energy facility?	This comment goes beyond the scope of this project. The CSE provides a description of the areas and strategies that may be used to address the State mandates for adequate transformation or disposal capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program.
252			11. Has the county moved forward on alternatives in the 10 years since Lancer?	This comment goes beyond the scope of this project.
256			12. Wasn't Lancer also a siting issue as well?	This comment goes beyond the scope of this project.
257			13. What does the County Siting Element say about siting a landfill near residents?	The CSE provides a description of the areas and strategies that may be used to address the State mandates for adequate transformation or disposal capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program. Also, see Topical Response #12.

**Table B-1
Summary of Oral Comments Received During Public Information Meetings
on the Los Angeles County Countywide Siting Element**

COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
258			14. What should be the distance of the landfill to the residential zone?	This comment goes beyond the scope of this project. Please refer to Topical Response #1.
259			15. Was the 25% reduction met as of 1995?	Yes, according to information provided by the California Integrated Waste Management Board.
260			16. How do you come up with those figures for what capacity is still remaining?	Please refer to Topical Response #9.
261			17. Is there any possibility that any of those meetings could take place up in the North part of the Valley, up closer to Granada Hills if we worked on a site with you?	Comment noted.
262	4/17/96	John Bergquist Citizen	1. I have a question concerning waste-to-energy plants. I understand there are two presently active in Los Angeles County. Perhaps you have figures available as to how much of the total disposable waste they actually consume on a daily basis. Is it one two percent, or do you have another figure?	The Commerce Refuse-to-Energy Facility (CREF) and Southeast Resource Recovery Facility (SERRF) consumes nearly 100 percent of the waste received, except for an occasional metal appliance which can't be burned. In 1995, CREF and SERRF managed 326 tons per day and 1,490 tons per day of waste, respectively, on a daily basis.
263			2. Are there plans to create or construct additional waste-to-energy plants within the county, perhaps at locations that wouldn't require too much hauling and waste of gasoline or fuel energy to get there?	Transformation facilities remain a valid solid waste disposal alternative, however, no new facilities have been proposed.
267			3. Waste-to-energy plants don't generate a surplus of energy?	Comment noted. The electricity produced at each facility is used on site, however, most is sold to Southern California Edison.
268			4. Do they generate electric power?	Yes.
269			5. Is there any possibility that such plants could replace some of the older Department of Water and power generating plants that will have to be retired or replaced at some time?	Please refer any questions to the City of Los Angeles Department of Water and Power.
270			6. Is the Department of Water and Power concerned with this issue at all?	Please refer any questions to the City of Los Angeles Department of Water and Power.
271	4/17/96	Bea Antenore Citizen	1. Has the 1995 goal been reached, or how is it doing?	Each city in the county is required to submit to the California Integrated Waste Management Board an annual report which states if the 25 percent diversion goal has been met or not. Please refer any questions to the specific city for which you need information.
272			2. Is each city graded by itself?	Yes.
273			3. How about Long Beach, how is it doing?	Please refer any questions to the City of Long Beach.

**Table B-1
Summary of Oral Comments Received During Public Information Meetings
on the Los Angeles County Countywide Siting Element**

COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
274	4/18/96	Jill Klajic City Councilperson of the City of Santa Clarita	1. The reports do not focus on source reduction and recycling as required by AB 939.	Source reduction and recycling are beyond the scope of the CSE. Please refer to Topical response #1 for further discussion.
275			2. The Action Plan and its 50 years of in-county landfilling prevents the Department of Public Works from aggressively adopting a more visionary and realistic plan for waste disposal.	Please refer to Topical Responses #1 and #13.
276			3. The report claims a disposal capacity shortage within three years yet proposes a solution which can not be achieved.	Please refer to Topical Response #9.
277			4. The wastestream numbers have been overestimated which allows the Department to support the development of more landfills in populated urban areas.	Please refer to Topical Response #9.
278	4/18/96	Jill Klajic City Councilperson of the City of Santa Clarita (cont'd)	5. The goals and objectives do not reflect the needs of the cities such as regional composting and material recovery facilities.	Please refer to Topical Response #10.
279			6. The plan does not address the opposition to and related costs of siting dangerous urban landfills near heavily populated communities.	This comment is beyond the scope of the CSE. Closure and Post Closure Maintenance is addressed in Article 3.3, Section 18230 of the CCR.
280			7. The plan has excluded all out-of-county or remote disposal facilities even though they are near completion and would be more economically feasible.	Please refer to Topical Response #3.
281	4/18/96	Allan Cameron Co-chairperson of Landfill Alternatives Save Environmental Resources (L.A.S.E.R.)	1. The full costs of landfilling should be taken into consideration including the cost of landfill maintenance after the time period required by state law.	This comment is beyond the scope of the CSE. Closure and Post Closure Maintenance is addressed in Article 3.3, Section 18230 of the CCR.
282			2. How will decision-makers provide for the long-term understanding of the liabilities and the costs associated with landfills in the CSE?	This comment is beyond the scope of the CSE. Closure and Post Closure Maintenance is addressed in Article 3.3, Section 18230 of the CCR.
283			3. The Bedminster technology would be able to handle Los Angeles County waste disposal needs.	Comment noted. Please refer to Topical Response #14.

**Table B-1
Summary of Oral Comments Received During Public Information Meetings
on the Los Angeles County Countywide Siting Element**

COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
284	4/18/96	Jon Jay Earth Communications Office (ECO) and the Environmental Coalition	1. Implementation of the CSE would cause significant environmental impacts even though the DEIR states that the plan will not. It is recommended that any language that provides assessments or conclusions based on generalities of environmental impacts and require a site specific review of environmental impacts. 2. It is further recommended that the view of the EPA per its comments on the Elsmere Canyon Landfill DEIR that significant impacts will occur during project construction and operation.	Comment noted. However, the CSE provides a description of the areas and strategies that may be used to address the State mandates for adequate transformation or disposal capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program. As such, the EIR is not intended to provide detailed information on impacts and mitigation measures for the siting of the solid waste disposal/transformation facilities listed. Please refer to Topical Response #1. Comment noted.
285				
286	4/18/96	Pat Saleatore Santa Clarita Valley Civic Association	1. The County should consider additional scenarios for the disposal of waste in the CSE and take into account varying degrees of the exportation of waste.	The revised documents include additional scenarios showing possible combinations. There are an infinite number of possible scenarios some more plausible than others. Each scenario is a speculation as to what may or may not happen. For additional scenarios and original scenarios, See Chapter 4, and Topical Response #9.
287	4/18/96	Pat Saleatore Santa Clarita Valley Civic Association (cont'd)	2. The CSE should address the issue of developing regional solid waste disposal policies that maximize the advantages to each county by sharing resources and facilities efficiently including recycling, composting, transformation, and disposal facilities.	In Los Angeles County there is no direct regulation on the flow of the wastestream on a county wide basis due to the free enterprise system that exists. Therefore, the County does not exercise any control over the flow of waste. Recent Court decisions have restricted the authority of local jurisdictions to pass ordinances regulating the flow of wastes within their boundary.
288	4/18/96	Maribel Marin Natural Resources Defense Council	1. The CoSWMP (sic) does not meet the needs of the county as a plan for achieving the objectives of AB 939; the plan focuses on landfilling waste and not maximizing feasible waste diversion as required by AB 939.	State law requires the CSE to focus only on residual waste which cannot be diverted. As such, the CSE as prepared meets AB939 requirements.
289			2. The plan does not provide plans for diversion infrastructure such as composting activities.	Please refer to Topical Response #1.
290			3. The Superior Court has ruled that the recycling of yard waste by using it as landfill alternative daily cover is illegal.	Green waste alternative daily cover provides a beneficial use of green waste which would otherwise be disposed in the landfill. The use of green waste in this manner also contributes to the establishment of the collection infrastructure needed in place for the development of composting facilities. The replacement of green waste with the use of foam as daily cover may cause additional disposal need if adequate composting capacity is not available. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 5.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
291			4. The NRDC recommends that the plan be rewritten to incorporate diversion plans that legitimately achieve AB 939 requirements.	Diversion plans go beyond the scope of this project. Please refer to Topical Response #1.
292			5. The NRDC recommends that specific goals above 50% be set along the lines of the City of Los Angeles' 70% diversion goal and include quantitative goals for composting, recycling, and waste reduction options.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 4. Setting goals for diversion composting, recycling, and waste reduction plans go beyond the scope of this project. Please refer to Topical Response #1.
293			6. The NRDC recommends that an advisory committee composed of environmental groups, business that are impacted by the plan, and citizen groups, be brought together to help develop these goals and options.	Comment noted. However, comment is beyond the scope of the CSE. Please refer to Topical Response #1.
294			7. The NRDC and other environmental organizations issue their support to Bio-Gro's Antelope Valley facility.	Comment noted.
295	4/18/96	Maribel Marin Natural Resources Defense Council (cont'd)	8. The NRDC urges the County to examine its ADC policy and its alternatives as it is a liability of the CoSWMP (sic).	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 5.
296	4/18/96	Jeff Seymour Alliance for Innovative Resource Management	1. A variable can rate policy should be enacted in the unincorporated County areas.	Enacting a variable can rate policy goes beyond the scope of this project. Please refer to Topical Response #1.
297			2. A Countywide goal of variable can rate pricing should be recommended to all Cities in the County by 1997.	A Countywide goal of variable can rate pricing goes beyond the scope of this project. Please refer to Topical Response #1.
298			3. The County should reduce the need for landfills by focusing its efforts on waste reduction measures.	Please refer to Topical Response #1.
299			4. The County should draw from the many successes around the country and create a partnership with the private sector to develop incentives to recycle.	Please refer to Topical Response #1.
300	4/18/96	Damian Durrant Save Your Forest Coalition	1. The County should adopt a policy to ban on inert materials including construction and demolition debris at Class III landfills.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 3.
301			2. The County should adopt a policy to ban yard waste, wood, and corrugated paper at Class III landfills.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 3.

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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
302			3. The County should adopt a policy to site more regional recycling and material recovery facilities.	
303			4. The County should adopt a policy to site more regional composting facilities.	
304			5. The County should adopt a policy of landfill capacity conservation through the use of synthetic daily cover and landfill mining.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 5 and Topical Response #2.
305			6. Real composters can not compete with the artificially low price of \$9 per ton for yard waste charged at the Puente Hills Landfill who uses it as ADC. This goes against the County's mandate for market development of composting.	Comment noted.
306			7. Rail-haul and out-of-county disposal should be considered an equal option to in-county landfill disposal, and not only a supplement to the in-county capacity.	Please refer to Topical Responses #3 and #5.
307	4/18/96	Damian Durrant Save Your Forest Coalition (cont'd)	8. The County needs to implement more aggressive waste diversion goals similar to the 70% goal of the City of Los Angeles. The County also needs specific waste prevention goals as do other counties.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 4.
308	4/18/96	Rich Widrig California RailFill Systems	The County should embody and plan for waste-by-rail in the plan.	Please refer to Topical Response #3.
309	4/18/96	Joan Edwards Representing a firm	1. Show in the Summary Plan specific activities, time lines, and clear reporting for its diversion efforts similar to the tracking of landfill capacity set up in the Action Plan.	
310			2. Compost or land-apply all its sludge instead of landfilling half of it at Puente Hills Landfill.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 3.
311			3. Implement a far more aggressive buy-recycled policy for the County and its contractors with targeted goals for all products.	
312			4. Publicize the two drop-off centers for recycled materials and add mixed paper to the list of materials accepted for recycling.	

**Table B-1
Summary of Oral Comments Received During Public Information Meetings
on the Los Angeles County Countywide Siting Element**

COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
313			5. Cease landfilling shredded tires and contract to recycle the tires instead at the tire recycling facility which opened in March in Los Angeles County.	This is beyond the scope of the CSE. Please refer to Topical Response #1.
314			6. Have all County agencies recycle, track, and report the disposal and diversion rate for all County operations.	
315			7. Improve recycling in the unincorporated County areas through the mechanisms of the Garbage Disposal Districts and County Ordinances. For example, mixed paper can be added to the list of materials accepting for recycling.	
316			8. Improve the assessment of diversion and landfill needs by conducting and reporting annual waste composition studies at all County operated landfills.	This is beyond the scope of the CSE. Please refer to Topical Response #1.
317			9. Greatly improve the scale and effectiveness of recycling, waste processing, and source reduction activities at the four landfills and one transfer station operated by the County Sanitation Districts. Currently, recycling at these landfills are inadequate and not publicly reported.	This is beyond the scope of the CSE. Please refer to Topical Response #1.
318	4/18/96	Joan Edwards Representing a firm (cont'd)	10. Substantially improve the County's Recycling Market Development Zone's outreach activities. Outreach and loans under this program have been minimal.	This is beyond the scope of the CSE. Please refer to Topical Response #1.
319	4/18/96	Mike Lewis Alliance for Innovative Resource Management	1. Landfilling is not the Alliance's preferred method of disposal.	Comment noted. Please refer to Topical Response #1.
320			2. The assumptions in the plan are in error: the waste generation rates are too high, the wastestream is overestimated, and the percentage proposed for landfilling is over the legal limit.	Please refer to Topical Response #9.
321			3. The plan does not accurately reflect the market changes occurring from composting and material recovery.	
322			4. The goals and policies do not contain any incentives, penalties, no fees, no per can charges to illustrate to the public the real cost of landfilling.	Comment noted. Please refer to Topical Responses #1 and #10.
323			5. The plan does not contain any bans at the landfills on items such as inerts, wood, and paper.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gerstman, Brickner, and Bratton, Inc., Item 3.

Table B-1
Summary of Oral Comments Received During Public Information Meetings
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COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
324			6. The County is still allowing sludge to be landfilled.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 3.
325			7. The County should look out-of-county for existing composting facilities as many other organizations in the county are doing.	This is beyond the scope of the CSE. Please refer to Topical Response #1.
326			8. The plan does not contain any deadlines or measurable objectives: how does the County know that the plan is implemented if nothing is measured at the end?	This is beyond the scope of the CSE. Please refer to Topical Response #1.
327			9. There is no recognition of the City (of Los Angeles') goal of going beyond the 50% recycling and reduction.	Comment noted. See review comments on the report entitled "Approaching an Integrated Solid Waste Management System for the Los Angeles County" dated September 13, 1996, prepared by Gershman, Brickner, and Bratton, Inc., Item 4.
328			10. There are no alternatives listed in the plan other than exhaustion of landfill capacity within three years or "landfill nirvana" with 56,000 tons of excess capacity in 15 or 20 years. Mid-range alternatives should be included.	The final CSE includes discussions and studies regarding alternative waste disposal technologies and use of out-of-county disposal. See Chapters 5 and 9 of the final CSE.
329	4/22/96	Allen Cameron Co-Chairman LASER- SCOPE	1. Since the proposed dumps will not be built, and existing dumps will not be expanded, what are you going to do?	Please refer to Topical Response #9.
330			2. How will you comply with the new Environmental Protection Agency methane restrictions?	Comment is beyond the scope of the CSE.
331	4/22/96	Frank Kortum LASER	1. At several of the Siting Element hearings, you've mentioned a composting facility. Is that facility included as a part of the Siting Element as a potential facility?	Composting Facilities are not considered a disposal facility. As such they are not included in the CSE.
332			2. Will this facility be considered a transformation facility?	Composting facilities are not classified as Transformation facilities.
333			3. Which authority determines the definition of a transformation facility?	The Public Resources Code 40201, of the California Integrated Waste Management Board defines Transformation as incineration, pyrolysis, distillation, gasification, or biological conversion other than composting. "Transformation" does not include composting or biomass conversion.
334			4. Where is it sited?	Please refer to Topical Response #1.

**Table B-1
Summary of Oral Comments Received During Public Information Meetings
on the Los Angeles County Countywide Siting Element**

COMMENT NUMBER	DATE	PERSONS/AGENCIES MAKING COMMENTS	SUMMARY OF COMMENTS	RESPONSE
335			5. What have you done to demonstrate whether restrictions on imports would have a discernible effect on interstate commerce?	Please refer to Topical Response #3.
336			6. Which specific part of AB 939 limits the Siting Element to transformation facilities and landfills?	Please refer to Topical Response #1. Also, the Public Resources Code 40120.1, of the California Integrated Waste Management Board defines disposal as the management of solid waste through landfill disposal or transformation at a permitted solid waste facility.

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APPENDIX 1-C

WRITTEN COMMENTS AND SPECIFIC RESPONSES

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APPENDIX 1-C

WRITTEN COMMENTS AND SPECIFIC RESPONSES

The public review and comment period for the Preliminary Draft CSE and Draft EIR was effective between March 11, 1996, and October 17, 1996. Oral and/or written comments were received from the State, cities, governmental agencies, residents, businesses, environmental groups, and other special interest groups as listed in the table below:

- Table C-1, List of Persons, Organizations and Public Agencies Submitting Written Comments on the Preliminary Draft Countywide Siting Element and Draft Environmental Impact Report.

It should be noted that if a written comment is submitted concurrent/subsequent to an oral comment, the comment is listed in Table B-1 for reference only and the subject comment is included in this appendix.

Table C-1 is organized such that the page number in the last column corresponds with the location of the written comment letter and related responses. Following Table C-1, are the sections containing the written comments received during the public review period between March 11, 1996, and October 17, 1996, on the Preliminary Draft CSE. The written comments are shown on the left-hand side of the page, while corresponding responses are shown on the right-hand side. The numbering system in this document has been selected to match the comments with the associated responses.

It should be noted that comments associated with and/or addressed to the Preliminary Draft Los Angeles County Integrated Waste Management Summary Plan and its related environmental document are not addressed in this Final Draft CSE. Responses to these comments can be found in the Final Draft Summary Plan and its Final Negative Declaration.

**TABLE C-1
WRITTEN COMMENTS**

**List of Persons, Organizations, and Public Agencies Submitting Written Comments on the
Preliminary Draft Countywide Siting Element**

City/Agency/ Organization	Author	Title	Date Received	Page¹
COMMENTS RECEIVED FROM CITIES				
South El Monte	Steven A. Henley	Assistant City Manager	4/9/96	1-82
Irwindale	David M. Polis	Polis Assoc.	4/16/96	1-83
Santa Clarita	George Carvalho	City Manager	4/22/96	1-89
Bell	Annette S. Peretz	Director of Development Services	5/20/96	1-96
Commerce	Richard King	Environmental Services Coordinator	5/20/96	1-97
Los Angeles	Elias Martinez	City Clerk	6/17/96	1-100
Monterey Park	Chris Jeffers	City Manager	6/17/96	1-103
Signal Hill	Richard P. Lundahl	Director of Public Works	6/17/96	1-107
West Covina ²	Michael Touhey	Mayor	6/17/96	1-109
Baldwin Park	Carl Yeats	Director of Admin. Services	6/18/96	1-116
Burbank	Michael J. McIninch	Administrative Analyst	6/18/96	1-118
Glendale	Kerry Morford	Director of Public Works	6/18/96	1-119
Santa Monica	Craig Perkins	Director of Environmental and Public Works Mgmt. Dept.	6/18/96	1-120
Vernon	Lewis J. Pozebon	Director of Environmental Health Dept.	6/18/96	1-122
Westside Cities: Beverly Hills, Culver City, Santa Monica, West Hollywood	Westside Cities Waste Management Committee	Various	6/18/96	1-126
Los Angeles	Delwin A. Biagi	Director of the Bureau of Sanitation	6/19/96	1-128
Glendora	Arthur E. Cook	City Manager	6/24/96	1-133
Los Angeles	Joe Maturino	LEA Program Manager	6/25/96	1-135
Santa Clarita	George Carvalho	City Manager	6/25/96	1-136
La Puente	Steve Hauerwaas	Management Asst./Solid Waste Coord.	9/12/96	1-140
West Covina	Michael L. Miller	Environmental Services Director	10/3/96	1-141

Note:

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- 2 Attached is the BKK court decision.

**TABLE C-1
WRITTEN COMMENTS**

**List of Persons, Organizations, and Public Agencies Submitting Written Comments on the
Preliminary Draft Countywide Siting Element**

City/Agency/ Organization	Author	Title	Date Received	Page¹
Walnut	Jack W. Yoshino	Senior Management Assistant	10/17/96	1-161
Glendale	Kerry Morford	Director of Public Works	11/12/96	1-162
Los Angeles	Hal Bernson	Councilman 12th District	4/3/96	1-165
Los Angeles	Marvin Braude	Councilman 11th District	4/11/96	1-166
Santa Clarita	Carl Boyer	Mayor	4/22/96	1-168
COMMENTS RECEIVED FROM GOVERNMENT AGENCIES				
Cal-Department of Transportation	Steven Buswell	Coordinator	3/28/96	1-174
Kern County Waste Mgmt Dept.	Susan L. Reid	RMDZ Coordinator	3/28/96	1-175
Cal-EPA/CIWMB	Robert C. Frazee	Vice Chairman	4/10/96	1-176
Main San Gabriel Basin Watermaster	Carol Williams	Executive Officer	4/29/96	1-177
Cal-EPA/CIWMB	Patrick Schiavo	Manager	4/29/96	1-179
So. Ca. Assoc. of Governments	Viviane Doche-Boulos	Intergovernmental Review	4/29/96	1-181
County Sanitation Districts	Donald S. Nellor		5/14/96	1-188
Santa Monica Mountains Conservancy	Minutes of 5/20/96 meeting		6/10/96	1-191
Newhall County Water District	Edwin Dunn	President	6/17/96	1-194
Upper San Gabriel Valley Municipal Water District	Robert G. Berlien	General Manager	6/18/96	1-203
US Forest Service	Michael J. Rogers	Forest Supervisor	6/19/96	1-205
City of Los Angeles Bureau of Sanitation	Drew Sones		7/16/96	1-207
US Department of Interior	Arthur E. Eck	Superintendent	8/26/96	1-208

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COMMENTS RECEIVED FROM THE PUBLIC				
LASER	Susan Villa	Private Citizen	4/2/96	1-213
Brentwood Community Federation	T. Larry Watts	President	4/6/96	1-216
Brentwood Hills Homeowners Association	Loretta Ditlow		4/8/96	1-217
Save Our Mountains, Inc.	Eric F. Edmunds, Jr.	Chair	4/9/96	1-218
Mission Canyon Coalition	Louise Frankel		4/11/96	1-219
SCOPE, SC Civic Association, SCU Pride Committee, SCV Sierra Club, LASER, SCU Canyons	Pat Saletore		4/11/96	1-222
Friends of Caballero Canyon	Jill Swift	President	4/18/96	1-223
BKK Corporation	Clarence Gieck	Director Technical Services	4/22/96	1-225
California Democratic Party	Ron Gillis	Director, Region 11	4/22/96	1-227
Democratic Candidate for Congress	Diane Trautman	25th Congress	4/22/96	1-228
Resident	Tom Owen	Resident	4/22/96	1-229
Resident	Scion and Ferdows Rahbar	Resident	4/22/96	1-230
League of Women Voters/ Los Angeles County	Jean E. Berger, Richard Seeley	President, Energy Director	4/24/96	1-232
UCLA School of Medicine, Department of Neurology	Robert C. Collins, M.D.	Professor and Chairman	4/29/96	1-234
Citizen/resident	Christine Kummer-Hardt	Citizen/resident	5/1/96	1-235
Granada Hospital Group/Resident	E. T. McGovern	Resident	5/1/96	1-236
Resident	Hult Ganis Family	Resident	5/1/96	1-237
Resident	Dr. Arnold L. Levee, M.D.	Resident	5/1/96	1-238
Resident	J. S. Baker	Resident	5/1/96	1-240
Resident	Pamela Lotwin Macofsky, Sidney Macofsky	Resident	5/1/96	1-241

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NBC Enterprises/Resident	John Agoglia	Resident	5/2/96	1-242
Resident	Mary & Steve Fenster	Resident	5/2/96	1-244
Resident	Steve Fenster	Resident	5/2/96	1-245
Resident	Richard A. Ray		5/2/96	1-246
Resident	Linda Olsen Weber	Resident	5/2/96	1-247
Resident	Mary Fenster	Resident	5/2/96	1-248
Resident	Joe C. Jones	Resident	5/2/96	1-249
Resident	Ben and Lovanne Nosbusch	Resident	5/2/96	1-250
Resident	Peggy McCain	Resident	5/2/96	1-251
Resident	Stephan and Claudia Kanne	Resident	5/6/96	1-252
Resident	Esther Akiyama	Resident	5/6/96	1-253
Resident	Joan McCraw	Resident	5/6/96	1-254
Resident	Dan & Christina Cooper	Resident	5/9/96	1-255
Resident	Kim and Doug Hauck	Resident	5/13/96	1-256
Olive View Neighborhood Watch	Charles O'Connell, P.E.,	Planning and Land use committee	5/16/96	1-257
Pacific Enterprises	Michael ...		6/6/96	1-259
Hacienda Heights Improvements Association, Inc.	James T. Davis	President	6/10/96	1-261
Resident	Bryan Gordon	Resident	6/11/96	1-264
Tarzana Property Owners Association, Inc.	Gregory Nelson	President	6/12/96	1-266
Lake View Terrace Improvement Assoc..	Cile Borman	Co-President	6/17/96	1-267

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LASER	Lynne Plambeck	Private Citizen	6/17/96	1-268
Resident	Royall Brown	Resident	6/17/96	1-278
Upper Mandeville Canyon Assoc..	Betsey Landis	Vice-President	6/17/96	1-279
Sierra Club	Andres Cano	Solid Waste Consultant	6/18/96	1-282
Terrace Homeowners Assoc.	M. Elaine Charlat	President	6/18/96	1-289
UltraSystems Environmental Inc. (for BFI re Sunshine Canyon)	Betsy Lindsay	Principal	6/18/96	1-290
Hacienda Heights Improvement Association Landfill Committee	Jeff Yann	Chair	6/20/96	1-292
UltraSystems Environmental Inc. (for BFI re Azusa Facility)	Betsy Lindsay	Principal	6/20/96	1-303
Bel Air Skycrest Property Owners Assoc.	Louis H. Nevell	President	6/26/96	1-305
Resident	Mark D. Granby	Resident	7/1/96	1-306
The Federation of Hillside & Canyon Associations Inc.	Mrs. R. Bell Hearst	President	7/1/96	1-307
Resident	Mr. & Mrs. Jimmy Hay	Resident	7/2/96	1-308
Resident	Stanley Kline	Resident	7/2/96	1-310
Resident	Jerome J. Berchin	Resident	7/9/96	1-311
Resident	Melvin E. Moskowitz	Resident	7/9/96	1-314
Resident	Walter Fleisher	Resident	7/9/96	1-316
Promontory Homes Association	Mehdi Motameni	Vice-President	7/15/96	1-317
Resident	Jed and Bobbie Cohen	Resident	7/15/96	1-319
Resident	Mehdi Motameni	Resident	7/15/96	1-320
Resident	Peter R. Calabrese	Resident	7/15/96	1-322
Resident	Phyllis Krystal	Resident	7/15/96	1-324
Resident	Zahra Motameni	Resident	7/15/96	1-325
Residents	Mr. and Mrs. Albert Scheps	Resident	7/15/96	1-327

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Resident	Shani Smolens	Resident	7/16/96	1-330
Resident	Mr. & Mrs. Hi Hand	Resident	7/17/96	1-331
Resident	Vivian J. Arterbery	Resident	7/22/96	1-332
Bel Air Skycrest Homeowner Assoc..	Danielle Stahler	Resident	7/31/96	1-333
Resident	Robert Salomon	Resident	8/1/96	1-334
NRDC	Maribel Marin	Working Group Coordinator	9/18/96	1-336
Federation of Hillside and Canyon Assoc.	Patricia Bell Hearst	President	10/17/96	1-346
S.C.V. Canyons Preservation Committee	Marsha A. McLean	President	10/17/96	1-347
AFIRM	William Hussey, Jr.	Regional Coordinator	10/17/96	1-348
AFIRM	William Hussey, Jr.	Regional Coordinator	10/22/96	1-376

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CITY OF SOUTH EL MONTE
 1415 N. SANTA ANITA AVENUE
 SOUTH EL MONTE, CALIFORNIA 91733
 (818) 579-8540 • (213) 686-0460 • FAX (818) 579-2107

April 8, 1996

RECEIVED
APR 9 1996
 DEPARTMENT OF PUBLIC WORKS
 ENVIRONMENTAL PROGRAMS DIVISION

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

Re: Countywide Siting Element

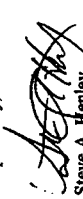
Gentlemen:

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-ays 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

CI | CI This comment is acknowledged.



ENVIRONMENTAL & PUBLIC INFORMATION CONSULTANTS
RECEIVED

April 8, 1996

APR 16 1996

David M. Smith
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803-1331

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

RE: Los Angeles County Siting Element and Summary Plan

Dear Mr. Smith:

The City of Inwandle has reviewed the draft reports as referenced together with the Draft Environmental Impact report on the Countywide Siting Plan and the proposed Negative Declaration on the Summary Plan. The following includes both comments on the plan and corrections as they relate to the City of Inwandle.

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force and the Environmental Programs Division are to be congratulated on producing a comprehensive set of documents dealing with such a complex issue as solid waste management in Los Angeles County.

Out-of-County Disposal

Our major concern with the plan has to do with out-of-county disposal capacity. We note the statement (Summary Plan, Volume 1, Page 5-24) that:

"Preparing the Summary Plan provides the County, the cities and other interested parties with the opportunity to determine the future direction of integrated waste management in Los Angeles County. It is important to determine what programs must be implemented, what barriers to overcome, and what infrastructure needs must be addressed in order to achieve the 50 percent diversion goal by the year 2000."

We note that in several instances in The Plan reference is made to the fact that a shortfall in disposal capacity for Los Angeles County jurisdictions could occur by 1999. The projections are

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C2.1 This comment is acknowledged
C2.1

based on the assumption that the various jurisdictions are diverting 25% of the waste stream and will be making sufficient progress to achieve 50% diversion by 2000.

In our view, this is not a very realistic assumption, nor are the options presented for future in-county disposal. We question whether efforts to develop landfill capacity in Mission Hills or Santa Clarita would even be consummated. Not only is Los Angeles County rapidly running out of in-county capacity, but a significant amount of tonnage is being imported from neighboring counties, thereby depleting available capacity.

The answer to us is quite simple, we must develop landfill capacity out-of-county. We believe the answer lies in rail-haul. Existing landfill sites could be developed into intermodal loading facilities where waste could be loaded and hauled by train to remote disposal sites. This should be occurring today before existing capacity is depleted.

By preserving existing capacity at several in-county landfill sites, the County would have emergency disposal capacity in the event of service interruption -- whether labor strikes, natural disasters or other causes. By maintaining the current sites, existing traffic patterns are preserved.

As you are well aware, traffic patterns are a critical issue in attempting to site any solid waste facility, whether a landfill, material recovery facility, transfer station or intermodal facility. Once an existing landfill is closed, residents can reasonably expect an end to the endless stream of rubbish packer trucks on their thoroughfares.

But when we review the *Draft Environmental Impact Report*, also prepared by the Environmental Programs Division we read:

"The Action Plan also recognizes the need for out-of-county solid waste disposal facilities in the long term."

In the long term?

We find no definition of long term in the various documents comprising *The Plan and Countywide Siting Element*, but even taken at face value, it appears to be a luxury the County can ill afford.

We note that the County's total disposed tonnage dropped significantly from 1990 to 1995, but was that due to increased recycling or a reflection in the economy? *Figure 4-1 of the Siting Element* presents an alarming trend.

Consider that an 11 % increase in the County's population is anticipated by 2000. Taxable sales

C2.2 Please refer to Topical Responses #3, #5, #6 and #9.

C2.3 Please refer to Topical Response #3.

C2.4 Please refer to Topical Response #9.

are expected to continue their upward trend, and a corresponding increase in consumer spending/disposed trash can be anticipated despite our best waste reduction efforts.

The future direction, the program to be implemented, the barriers to be over come, and the infrastructure needs are the challenges to be addressed today.

Given all of this, we believe that securing out-of-county disposal capacity should be the number one priority of Los Angeles County, and not something out there in the "long term."

Sincerely,

POLIS ASSOCIATES, INC.
David M. Polis

David M. Polis

enclosure

CC: David Caretto, City Manager
Carlos Alvarado, City Engineer

C2.5 Please refer to Topical Response #1.

C2.5

SUMMARY PLAN VOLUME 1 THE PLAN	
Page	Reference Comment
3-14	Table 3-14 Department responsible should be Public Works
4-6	Table 4-1 Service is provided by Franchise for both residential and nonresidential waste generators. Also number of nonresidential haulers should be 6.
4-16	Table 4-4 Irwindale was not included in this matrix although the City did indicate that there would be future needs
5-57	Procurement Cooperatives State of Maryland's procurement cooperative has been the model for this undertaking. The state was able to make recycled paper available to all jurisdictions, school districts, etc., more than a dozen years ago through a warehouse arrangement. This is one area where LA County could provide a beneficial service to local jurisdictions and make a significant market development impact.
n/a	Table 5-1 Existing Source Reduction Programs. Matrix should show Irwindale providing (1) Rate Structure Modifications associated with its AB 939 fee, including disposal fee modifications and quantity-based user fees; (2) Economic Incentives (fees); (3) Technical Assistance (waste evaluations, commercial sector, educational efforts, nonprocurement activities); (4) Regulatory Programs (planning and reporting requirements)
n/a	Table 5-3 Existing Recycling Programs. Matrix show Irwindale providing: (1) Nonresidential sector (organized municipal program); (2) Supportive policies (antiscavenging policy, business permit requirements, mandatory hauler service requirements, franchised recycling services, education/promotion, technical assistance)
n/a	Table 5-5 Existing Composting Programs. Matrix should show Irwindale: (1) Residential pickup service, Christmas tree program. (2) Supportive Policies (education/promotion, technical assistance)
n/a	Table 5-7 Existing Special Waste Programs. Matrix should show Irwindale provides: (1) the recycling, recycling of street maintenance material
n/a	Table 5-9 Existing Education and Public Information Program: (1) Newsletter, newspaper articles and press releases, brochures and fact sheets, radio/TV PSAs, information hotline, presentations and workshops, videos and slide shows, special events, waste evaluations, technical assistance, school specific materials, interjurisdictional cooperation)

n/a	Table 5-16	Existing HHW Education and Public Information Programs: (1) (newsletter, video/slide show, presentations, schools, interjurisdictional cooperation
n/a	Table 5-19	while this is a compilation of information from NDFEs, it is incomplete based on information being gathered as a result of free on-site waste evaluations
6-11	Table 6-1	Program Funding Sources: Irwindale is shifting from General Fund to an AB 939 fee and a franchise fee
SUMMARY PLAN VOLUME II APPENDICES		
1 of 5	Irwindale	(7) Responsible department should be Public Works
1		(8) Type of residential service: should be franchise
1		(12) Landfills used for residential waste disposal, should include Spadra and Azusa landfills
1		(13) type of commercial service should be franchise
2		(14) Number of hauler should be 7
2		(17) Landfills should include Spadra, Azusa, Commerce WTE, Peck Road, Reliance Pit (as noted)
2		(18) Based on information now available, the indicated tonnage for 1994 is significantly
2		(20) Additional transportation
2		(21) Should be franchise
3		(2) Curbside single family commingled: Yes
3		(14) Rate structure modifications: Yes
3		(17) Commercial source separation: Yes
3		(18) Commercial commingled: Yes
3		(19) Commercial salvage operations: Yes
4		(22) Commercial rate structure modifications: Yes
4		(26) Other commercial programs: Yes
4		(33) Curbside green waste: Yes
4		(40) Construction/Demolition: Yes
4		(41) Tires: Yes
5		(48) Large item pickup: Yes

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DRAFT PRESENTATION TO BE MADE TO THE LOS ANGELES COUNTY
DEPARTMENT OF PLANNING AND DEPARTMENT OF FORESTRY CONCERNING
THE PROPOSED ELSMERE LANDFILL

Mr. Chairman, Members of the Committee, Members of the Audience:

Thank you for the opportunity to make this presentation this evening. My name is George Caravalho, City Manager of the City of Santa Clarita. I would like to begin my presentation by proposing that the County and Department of Forestry devote more energies to seeking alternatives to new landfills. The process indicated by the County began with looking at 100 different alternatives and narrowing them down to 6, and it seems that those have now been narrowed to 2, primarily Elsmere and Towsley Canyon, located within the Santa Clarita Valley. The Santa Clarita Valley currently has 2 other landfills, the Chiquita Canyon landfill and Sunshine Canyon, which straddles both the San Fernando and Santa Clarita Valleys. In addition, we have a small landfill facility at the County detention center in Castaic. We do not want to become the "Valley of the Dumps." The recently published August 1990 draft program EIR indicates that there will be a short fall capacity

11/23/90

C3.1

C3.1

This comment is noted. However, the purpose of the CSE and EIR is not to address specific issues relating to the siting or development of a landfill in Elsmere Canyon. As a part of the draft EIR/EIS preparation and the consideration of alternate sites, in addition to the re-evaluation of the 101 sites identified in the Preliminary Alternate Site Study, the EIR/EIS evaluated an additional 50 sites which were not identified in any previous studies. The draft EIR/EIS found critical deficiencies in all the sites evaluated except for the four sites not eliminated as a result of subsequent studies to the Preliminary Alternate Site Study which was conducted by the County Sanitation Districts of Los Angeles County and the County Department of Public Works. Please refer to Topical Response #1 and #6 for further discussion.

at the year 2001 with diversion and without additional expansion and new sites. It would seem that to continue the focus on reduction in the solid waste stream, recycling, making fundamental changes in packaging, and re-thinking the wisdom of burial of non-renewable assets would be of primary benefit to our society. If new landfills are to be built, don't put them in urban areas. Use waste by rail to put landfills in remote areas. Also, consider energy recovery methods, such as pyrolysis, that can reduce the need for landfills by 90%. It would seem that this policy could have a significant impact in reducing the need for landfills in urban areas.

The no action alternative --

Elsmere Canyon should be considered as a pristine canyon and a non-renewable asset. Once filled with garbage it will be lost forever. This irreversible decision once made cannot be undone. If we had a policy of filling in the San Francisco Bay, once that decision had been made, and there had been many areas filled, that decision could not be undone. If we highly urbanize an area, we cannot consider going back and tearing it down and making it into farms. This is not unlike the decision

C3.2

C3.2

The Final Draft CSE incorporates a new chapter (Chapter 5) discussing alternative disposal technologies and methods to enhance existing disposal capacity. In addition, there is an expanded discussion regarding out-of-Los Angeles County landfills in Chapter 9 of the Final CSE. Please refer to Topical Response #3 and #14 for further discussion.

C3.3

C3.3

These comments are noted. However, the purpose of the CSE and EIR is not to address specific issues relating to the siting or development of a landfill in Elsmere Canyon. Please refer to Topical Responses #1 and #8 for further discussion.

C3.3 (cont'd)

of locating landfills here at Elsmere and/or Towsley Canyon. The City General Plan currently envisions the surrounding area as a greenbelt around the City. The National Forest lands to the south, southwest, and to the north provide a buffer for the urban area. Donald Ruklehouse, former EPA director, stated once that one of his major concerns was making decisions that would prove to be wrong 50 years from today. This decision of locating a major landfill in the Santa Clarita Valley would fall into that category.

The issue of air quality --

We must look beyond the assurances of our technicians indicating that the dump would not contaminate or worsen our air quality. The Lopez Canyon landfill has been cited 28 times for methane gas emissions which exceeded AQMD standards during the period April thru July 1990. This is a period of 4 months. Take a hard look at those who seek to assure you that Elsmere will be different. Will Elsmere's "state of the art" be different from the state of the art at Lopez, or will Elsmere become a potentially explosive gas dump, too? A recent report indicated that the San Fernando Valley exceeded air quality standards 72 days per year. In the Santa Clarita Valley we exceed the AQMD standards for ozone 87 days a year. Being on the easterly side of the urban area, we are impacted by the drift of smog into our Valley. By adding a landfill and thousands of trucks travelling up the freeway each day, we can only further deteriorate our air quality.

C3.4

C3.4 This comment is noted. However, the purpose of the CSE and EIR is not to address specific issues relating to the siting or development of a landfill in Elsmere Canyon. Please refer to Topical Responses #1 and #8 for further discussion..

Archaeological and cultural sites --

We have insisted for some time on thorough reports and evaluations on the impact of any cultural and archaeological sites. To date the Forest Service has refused to reveal whether any such sites exist. This refusal violates the Federal Freedom of Information Act and the National Environmental Policy Act. We will expect and are entitled to better service from the Forest Service. I should mention that over the period of dealing with the proposal of a landfill at Elsmere we have had substantial difficulty in obtaining information from the City of Los Angeles, from the County of Los Angeles, and now from the Forest Service. We find this to be reprehensible. As a public agency representing the people that are the most impacted by this decision, we must be made a full participant and involved member of the process.

Groundwater protection---

The EIS must carefully evaluate whether Elsmere Canyon is a place for a landfill. We currently receive 50% of our water from the ground water table. Seismic conditions must be thoroughly evaluated. Only 18 years ago at a site where you will be having a hearing tomorrow, Sylmar, a major earthquake

C3.5

C3.5 and C3.6

This comment is noted. However, the purpose of the CSE and EIR is not to address specific issues relating to the siting or development of a landfill in Elsmere Canyon. Please refer to Topical Responses #1 and #8 for further discussion.

C3.6

occurred which caused substantial damage. This area has indications of being very unstable and will be subject to substantial shaking in the event of another earthquake. So, too, we must evaluate the seepage of petroleum which could possibly disrupt the liners. Can the liners and leachate collection system be effective under these conditions? Will they protect us against the release of contaminants from the landfill? What impact will the DWP water line located near this area have on Elsmere Canyon if it ruptures during an earthquake?

Traffic and quality of life --

We ask that you look carefully at the impact of these thousands of trucks heading back and forth from Santa Clarita. Look at the current traffic problems we're having on Highway 14 and I-5. There are currently proposed substantial increases in housing units in the Antelope Valley. As you look at this 50 year time frame for the capacity of Elsmere, thousands of other homes will be developed, and over 1 million people will live in the Antelope and Santa Clarita Valleys. This will further impact Highway 14 and 5, making the Y of 14 and 5 highly congested. More fundamentally, what impact will a garbage dump have on the character of the City of Santa Clarita and the quality of life here? I expressed earlier a real concern with the loss of open space and national forests surrounding the Santa Clarita Valley. In a recent article published in the

C3.7

C3.7 Please refer to Topical Responses #8.

C3.8

C3.8 This comment is noted. However, the purpose of the CSE and EIR is not to address specific issues relating to the siting or development of a landfill in Elsmere Canyon. Please refer to Topical Responses #1 and #8 for further discussion.

Los Angeles Times Opinion Section, September 9, 1990, Daniel B. Boykin stated in his article "Can't See the Forest for the Monument" that there is little doubt about how central a concern the environment has become. A new survey by the Environmental Opinion Study, Inc., indicates that 82% of the voters place it among the top 3 or 4 issues. If required, 72% would sacrifice economic growth to environmental quality, but 82% believe that creating a cleaner environment will increase jobs and income levels.

C3.9

C3.9

This comment is noted. However, the purpose of the CSE and EIR is not to address specific issues relating to the siting or development of a landfill in Elsmere Canyon. Please refer to Topical Responses #1 and #8 for further discussion.

Will the proximity of the dump depress property values and change the character of the City of Santa Clarita?

C3.10

C3.10

This comment is beyond the scope of the CSE.

Will the ability of the City of Santa Clarita to protect its environment be adversely affected by the dump's proximity?

Look carefully at just what the Forest Service will be inflicting on the residents of Santa Clarita. Our City Council has carefully evaluated the proposal, held a public forum, prior to making a unanimous decision to represent our citizens in opposing this landfill.

In closing I'd like to say that about 30 years ago, our government embarked on a policy of construction or development of nuclear plants throughout this country. It was indicated that by the year 2000 50% of our energy would be derived from nuclear plants. After expenditure of billions of dollars in planning and development of nuclear plants, many have been abandoned. Many were abandoned after the plant was actually constructed and ready for operation. These bonds are currently being paid without the benefit of the services for which the public has paid. Much of this came about because of lack of communication and involvement of the public that were to be impacted by that decision before this policy decision was implemented. I use this analogy to indicate that this is the same path that is being undertaken on this major decision. The Department of Forestry needs to carefully examine whether it is abiding by its charter in protecting national forest lands for the benefit of its citizenry, especially those forest lands currently located in large, urban areas like the Los Angeles area. The County and City of Los Angeles need to examine or re-examine whether in fact current policy of locating major landfills within the urban area is desirable and consistent with the wishes of the public. As stated earlier, we strongly recommend that you pursue other alternatives to the development of new landfills in the urban area.

C3.11

C3.11 and C3.12

This comment is noted. However, the purpose of the CSE and EIR is not to address specific issues relating to the siting or development of a landfill in Elsmere Canyon. Please refer to Topical Responses #1 and #5 for further discussion.

C3.12

Rolf Janssen • Mayor
George Mirabal • Mayor Pro Tem
George Francis Bass • Councilman
George Cole • Councilman
Ray Johnson • Councilman



6330 Pine Avenue
Bell, CA 90201-1291
(213) 588-6211
Fax: (213) 771-9473

May 14, 1996

Mr. Donald Wolfe, Deputy Director
Los Angeles County Department of Public Works
Environmental Programs Division
Post Office Box 1460
Alhambra, California 91802-1460

Dear Mr. Wolfe:

This letter is in response to your Department's request for review and comment on the Los Angeles County Draft Countywide Siting Element, Draft Countywide Integrated Waste Management Summary Plan, and related environmental documents. The City of Bell hereby submits its response as follows:

- Draft Siting Element - No Comment
- Draft EIR - No Comment
- Proposed Negative Declaration for the Summary Plan
Please incorporate the following information into the Draft Summary Plan as appropriate:
 1. Table 5-5 - Summary of Existing Composting Program - The City of Bell sponsors an annual Christmas Tree Recycling Program.
 2. Table 5-9 - Summary of Existing Education and Public Information Programs - In conjunction with the Southeast Economic Development Corporation (SCDC), the City of Bell was awarded a grant to conduct a waste prevention public education program utilizing the CIWMB's printed advertising materials.
 3. Table 5-15 - Summary of Selected Household Hazardous Waste Collection Programs - The City of Bell is currently participating in the CIWMB's Third Cycle Used Oil Grant Recycling Program. Residents dispose of used motor oil at certified collection centers.

Thank you for the opportunity to respond to the County's Draft Waste Management Documents. Should any questions arise regarding the City's comments, please contact Ms. Tina Gall of my staff at (213) 588-6211, extension 222.

Sincerely,

Annette S. Peretz
Director of Development Services

ASP:TG/vdw

cc: Robert A. Rizzo, Chief Administrative Officer

C4

C4

This comment is acknowledged.



CITY OF COMMERCE

Robert J. Cornejo, Mayor
Sylvia Montes, Mayor Pro Tem
Justus M. Cervantes, Councilmember Artemio E. Navarro Councilmember Paul T. Romero, City Administrator

DS

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
Altamira, 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 SITTING 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.

C5.1 This comment is acknowledged.

1. INITIAL STUDY

SECTION V, AIR QUALITY, (a):

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:** *For Commerce, 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".*

8. **Table 5-14: 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".

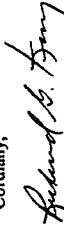
3. **DRAFT ENVIRONMENTAL IMPACT REPORT SITING ELEMENT**

1. Type: 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/ir

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

C5.2

C5.2

This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.

C5.3

C5.3

This comment is acknowledged.

CITY OF LOS ANGELES
CALIFORNIA



ELIAS MARTINEZ
City Clerk

J. Michael Cozy
Executive Officer

When making inquiries
relative to this matter
refer to File No.

96-0896

RICHARD J. RIORDAN
MAYOR

Office of
CITY CLERK
Council and Public Services
Room 395, City Hall
Los Angeles, CA 90012
Council File Information - (213) 485-5793
General Information - (213) 485-5785

Pai Healy
Chief Legislative Assistant

173/SA -
327

June 14, 1996

Mr. Harry W. Stone, Director
Los Angeles County Department of
Public Works
P.O. Box 1460
Alhambra, California-91802-1460

Dear Mr. Stone:

Forwarded under cover of this letter is a Certified Copy of the
Communication adopted June 12, 1996, by the Los Angeles City
Council requesting that your Department remove Lopez Canyon,
Mission-Rustic-Sullivan canyons and sunshine canyon from the Draft
Countywide Siting Element as potential landfill sites.

This action also requests that the Los Angeles County Board of
Supervisors extend for 120 days the public comment period for these
plans.

For further information on this matter, you may contact
Councilperson Braude at (213) 485-3811 or Ronald F. Deaton, Chief
Legislative Analyst, at (213) 485-6622.

Sincerely,

ELIAS MARTINEZ, CITY CLERK

Elias Martinez
Deputy City Clerk

RECEIVED

JUN 17 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

COMMUNICATION

TO: LOS ANGELES CITY COUNCIL File No. 96-0896
FROM: COUNCIL MEMBER MARVIN BRAUDE, CHAIR
ENVIRONMENTAL QUALITY AND WASTE MANAGEMENT COMMITTEE

Public Comments Yes No
_____ XX

COMMUNICATION FROM CHAIRPERSON, ENVIRONMENTAL QUALITY AND WASTE MANAGEMENT COMMITTEE relative to a request for the County of Los Angeles, Department of Public Works to remove Lopez Canyon and Mission-Rustic-Sullivan Canyons from consideration as potential landfill sites and remove any expansion of Sunshine Canyon within the City, pursuant to the Draft Countywide Siting Element.

Recommendations for Council action, pursuant to Motion (Bernson-Alarcon):

1. REQUEST the County of Los Angeles, Department of Public Works to remove Lopez Canyon and Mission-Rustic-Sullivan Canyons and Sunshine Canyon from the Draft Countywide Siting Element as potential landfill sites.
2. REQUEST the Los Angeles County Board of Supervisors extend for 120 days the public comment period for these plans, and that the City Legislative Analyst prepare a report for council that reviews these documents in relation to the City's adopted solid waste management policies in order to determine deficiencies, benefits and implications.

Fiscal Impact Statement: None submitted by the Bureau of Sanitation.

Summary:

On June 12, 1996, the Chair of the Environmental Quality and Waste Management Committee considered the Draft Countywide Siting Element of the County of Los Angeles. The County disposal plan lists existing and potential landfill sites which may be used and/or developed for landfill disposal for the County of Los Angeles. Potential landfill sites include: (1) Lopez Canyon, (2) Mission-Rustic-Sullivan canyons; and (3) Sunshine Canyon Landfill (expansion into the City).

The Bureau indicated that these sites had been reviewed in the past by the City and were not approved as landfill sites. The Bureau requested that the Draft reflect the actions of the City Council and acknowledge what are and are not potential sites. The Chair concurred and recommends exclusion of (1) Lopez Canyon, (2)

C6.1

C6.1

Lopez Canyon Landfill expansion has been removed from further consideration in the CSE

C6.2

The Mission-Rustic-Sullivan canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

State law, Sections 41711 and 41712 of California Public Resources Code, requires that sites such as the Sunshine Canyon Landfill expansion within the City of Los Angeles boundary, which are identified as "tentatively reserved" in the CSE, must be removed from the document if they are not brought into consistency with the jurisdiction's General Plan by the first five-year revision of the Countywide Integrated Waste Management Plan.

Please refer to Topical Response #6 and #12 for further discussion.

C6.2

The public review was extended to October 17, 1997. Please refer to Topical Response #7 for further discussion.

Mission-Rustic-Sullivan Canyons and (3) Sunshine Canyon from the plan; and, a request to the County that the period of public comment be extended for 120 days. The Chair then forwarded the matter to the Council for its consideration.

Respectfully submitted,

Marvin Braude

Council Member Marvin Braude, Chair
Environmental Quality and Waste Management Committee

CERTIFICATION

STATE OF CALIFORNIA, I ss.
COUNTY OF LOS ANGELES,

I, Elias Martinez, City Clerk of the City of Los Angeles and ex-officio Clerk of the City of Los Angeles, do hereby certify and attest the foregoing to be a full, true and correct copy of the original communication from Councilmember Marvin Braude, Chairperson, Environmental Quality and Waste Management Committee, on file in my office, and that I have carefully compared the same with the original.

ADOPTED
MOTION ADOPTED TO APPROVE COMMUNICATION RECOMMENDATION
JUN 12 1996

LOS ANGELES CITY COUNCIL

In Witness Whereof, I have hereunto set my hand and affixed the Seal of the City of Los Angeles, this 14th day of June 1996.

Elias Martinez
City Clerk of the City of Los Angeles

By *John C. Burmahin*
John C. Burmahin, Deputy

CERT.JCB

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

C7.1 This comment is acknowledged.

C7.2 Please refer to Topical Response #3.

C7.3 Please refer to Topical Response #6.

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.

C7.4 Please refer to Topical Response #3.

C7.4

C7.5 Please refer to Topical Response #2.

C7.5

C7.5

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.

C7.6

C7.6

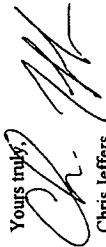
This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.

NEGATIVE DECLARATION

No comments.

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

C7.7 This comment is acknowledged.

C7.7



CITY OF SIGNAL HILL

2175 Cherry Avenue • Signal Hill, California 90806 • (310) 989-7300 • FAX (310) 989-7393 / 7391

June 11, 1996

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

Attention: Mr. Michael Mohajer

Subject: Official Review of the Los Angeles County Countywide Siting Element - File EP-2

Dear Mr. Mohajer:

Staff has reviewed the Los Angeles County Countywide Siting Element and its Draft Environmental Impact Report, and the Countywide Integrated Waste Management Summary Plan and its Proposed Negative Declaration. The City would like to submit the following recommended correction:

- Table 4-2, Quantities of Solid Waste Collected within the Summary Plan, shows a Baseline Annual Disposal (1990) of 15,990 tons. This disposal tonnage was corrected to 15,350 tons by the California Integrated Waste Management Board in the staff report dated September 21, 1994 approving the City's SRRE/HHWE.

Table 4-2 also shows a 1995 Annual Disposal for the City of Signal Hill of 21,064.79 tons. There is a large discrepancy between the County disposal tons and those reported by our single waste hauler within the City, Signal Hill Disposal. Signal Hill Disposal reported a total disposal for 1995 of 14,040 tons. While these figures do not represent self-haul disposal, a discrepancy of approximately 7,025 tons cannot be accounted for with the limited number of companies doing self-haul within our City.

After careful review of the solid waste reporting system used by Los Angeles County, we find it hard to accept the total countywide Annual Disposal of 12,181,064.07 tons based on the one week per quarter survey methodology. This non-scientific survey methodology provides many opportunities for introducing catastrophic errors to the data base, and should not be used. Orange and Riverside Counties are operating their reporting system using a daily survey method. This system eliminates short term aberrations to the normal disposal practices of participating agencies.

3170

DP

Official Review of the Los Angeles County Countywide Siting Element - File EP-2
June 11, 1996
Page 2

The City of Signal Hill requests that the survey method be reviewed and modified to help eliminate the possible introduction of errors by switching to the daily survey methodology used by Orange and Riverside Counties. Please keep us informed of any possible changes the County is considering to the annual reporting methodology, and any possible solutions to the obviously distorted disposal tonnages for 1995.

If you should require any additional information, please contact Mr. Chris Parmenter, Civil Engineer Assistant, at (310) 989-7359.

Sincerely,



RICHARD P. LUNDAHL
Director of Public Works/City Engineer

RPL/crp

June 12, 1996

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

RECEIVED

JUN 17 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

Dear Mr. Stone:

Subject: Preliminary Draft of the Los Angeles County Countywide Siting
Element; Draft Summary Plan of the Countywide Integrated Waste
Management Plan; and related Environmental Documents

The City has completed a review of the subject documents. Absent another
person to whom we can address our comments, this letter is directed to you.

The City Council received a report from the City's Waste Management and
Environmental Quality Commission on their analysis of the documents. On May
21, 1996, the City Council unanimously approved motion to transmit these
comments and state the City's position that:

We support the Siting Element as a short-term, fair-share approach
for waste disposal that does not rely on any one geographical area,
provided that the next step is taken to develop a truly integrated
waste management plan with the cities and the county.

Comments

Our review has concluded that the Siting Element and Summary Plan fall short
of being adequate for the county and the cities in the county. The Siting
Element includes possible sites and text that, unless deleted or modified,
some cities may act to disapprove the Element. If not approved, the Siting
Element may have economic consequences on the county and the cities in the
county.

The Summary Plan does not take an "integrated" approach to management of waste
in the County; from waste production to disposal. The Summary Plan is not
integrated with the Siting Element. The Summary Plan leaves each city to
their own devices to develop and fund their programs. While programs are
listed, little has been done to coordinate programs to maximize the impact of

C9.1

C9.1 This comment is acknowledged.

C9.2

C9.2 This comment is acknowledged.
Please refer to Topical Response #1 for further discussion.

C9.3

C9.3 Please refer to Topical Response #6.

scarce financial resources. The County has a funding source that is not shared with the cities in a significant way.

SOLUTION

The County needs to develop an Integrated Waste Management Plan that:

1. Assesses where and what wastes are produced.
2. Develops a coordinated program to achieve source reduction, recycling, composting, and education.
3. Determines the general location of facilities to implement the waste diversion programs. Facilities include transfer stations, material recovery facilities, and disposal facilities.
4. Approaches the development of facilities as a private sector and public sector partnership. Often the private sector has the expertise and the public sector has the favored financing.
5. Is based on the cooperation of all 88 cities and the County.
6. Provides the funding for all cities and County to do 1, 2, & 3 above.

We recognize the fact that the County alone cannot achieve the needed Integrated Waste Management Plan. The Los Angeles County Waste Management Task Force does not have the authority or the means to create an Integrated Waste Management Plan. The County and all the cities in the County are the only means for creating an Integrated Waste Management Plan.

Therefore we are asking the County and the Task Force to:

1. Find a way to provide a mechanism for all 88 cities and the county to actively participate in the production of an Integrated Waste Management Plan.
A possible approach would be to create subregional groupings of all county cities. These groupings could provide a local forum for input on local needs. These groups would select representatives to work with or on the Task Force to develop appropriate "coordinated programs" and policies for the countywide Plan. These representatives could either supplement the Task Force or form the basis for a revised Task Force membership that would have a greater number of seats. The number of seats could be similar to the SCAG approach to the subregions or some other workable number.
2. Draft new or supplemental waste diversion and management policies and programs that will address how the cities and the county in Los Angeles County can work together to meet the state mandates.

COMastPlan3
6/13/96

2

PRINTED ON RECYCLED PAPER

C9.4

C9.4

The CSE and SP was developed in coordination with the Task Force as stipulated in Section 18777 of the CCR. The law specifically defines the role of the Task Force in the preparation of these documents.

The law also specifies the various composition of the Task Force. Task Force members include representation of City governments, County Board of Supervisors, private industry, environmental groups and the general public.

An approach could be to aggressively seek the input from all participating jurisdictions through meetings within the subregions. At a minimum, an additional goal should be adopted whereby: "In response to the expressed needs of local jurisdictions, the county and all the cities in the county should implement a countywide waste diversion strategy." Coordinated programs are needed to address areas that cannot be adequately addressed by individual jurisdictions. Examples include the use of television and radio promotions of waste reduction and consideration of coordinated approaches to the recycling of construction and demolition waste.

After drafting possible policy statements, we need to aggressively seek the reaction and constructive suggestions from all participants to produce a final list of policies for the county.


3. Develop a coordinated or integrated funding program to fund the selected programs and provide the funds to plan for the future.

We need to assess funding options for the selected programs, including the County Waste Management Fee. Select the funding approach that makes the most sense and will benefit all of the participants in the program.

The City of West Covina believes these steps need to be taken if we are to achieve the required waste diversion, manage our waste, and control costs to the public. The City requests steps be taken to develop an Integrated Waste Management Plan, including a Facility Siting Plan, that the County and all cities can support. In the meantime, we support the Siting Element as a short-term, fair-share approach for waste disposal that does not rely on any one geographical area, provided that the next step is taken to develop a truly Integrated Waste Management Plan with all the cities and the County.

If you have any questions or need further information, please call Michael Miller, Environmental Services Director, at (818) 814-8411.

Yours truly,



Michael Touhey
Mayor

CC: All Los Angeles County Cities

MINUTES OF THE REGULAR MEETING OF THE
WASTE MANAGEMENT AND ENVIRONMENTAL QUALITY COMMISSION
MARCH 21, 1996

Meeting convened at 7:35 P.M.

Pledge of allegiance was led by Commissioner Polich.

Invocation was given by Commissioner Hedlund.

COMMISSIONERS IN ATTENDANCE: Hedlund, Ketter-Ingham, Hassarotto, Polich

COMMISSIONER ABSENT: Santeff

STAFF IN ATTENDANCE: Miller, Tong

I. PUBLIC INPUT ON AGENDA ITEMS

Jean Arneson talked about recycling and the closure of the Ralph's Recycling Center. Jean Arneson also described an interview she watched on television where Rod Nelson of the Regional Water Board acknowledged that there was considerable contamination of ground water from BKK.

Royall Brown urged the Commissioners to attend the 7 P.M. Los Angeles County meetings on the Integrated Waste Management Summary Plan and Staging Element on April 3, 1996 in Duarte, April 9, 1996 at the Senior Citizens Center in West Covina, and April 10, 1996 at the County Sanitation District.

II. MINUTES OF JOINT MEETING WITH CITY COUNCIL OF JANUARY 18, 1996 AND REGULAR MEETING OF FEBRUARY 15, 1996

Notion by Hedlund to approve minutes as prepared. Minutes were accepted as prepared.

III. CITY COUNCIL ACTIONS OF FEBRUARY 20, 1996 AND MARCH 5, 1996 AND PLANNING COMMISSION ACTION OF MARCH 12, 1996

Oral report provided by Mike Miller. City Council received and filed the report on the Athens HRF and directed staff to monitor HRF activities, but not to pursue options.

City Council approved the City Budget for Landfill Closure Review and a contract with CDM for their technical expertise and landscape architects to help review plans submitted for the BKK Closure.

The Planning Commission approved modification of BKK's land use permit changing the cessation date for the receipt of waste to be no later than September 15, 1996 as stated in the stipulated settlement of the MOU Court case. There are indications that the landfill will probably close before the deadline and expectations that Sunshine Canyon will be open no later than July 1, 1996.

Commissioner Hassarotto asked if BKK will operate Sunshine Canyon. Mike Miller responded that BKF will operate and own Sunshine Canyon.

Discussion followed on HRF construction and location.

IV. BIO-CYCLE CONFERENCE

Oral report provided by Vice-Chair Hedlund. Hedlund thanked the City for allowing him to go to the Bio-Cycle Conference and indicated his disappointment with the conference due to the scheduling of sessions. Vice-Chair Hedlund brought back brochures and information for the Commissioners to review. He also described field trips to three composting facilities outside of Seattle.

Hike Miller recommended that if Vice-Chair wished to write a letter addressing his complaints to the conference organizers, staff would be happy to place the letter on West Covina letterhead.

V. RECYCLING

Commissioner Ketteringham expressed his concern that the Commission needs further direction from the City Council on how to address the recycling issue and a need for new ideas on approaching recycling. He believes that a MRF is still the best way to achieve the diversion goal.

Hike Miller expects that the recycling issue will come to the forefront when a crisis situation occurs. The problem is not capacity, but location of the capacity. It will probably come up again toward the end of the year because costs will increase due to longer hauls and longer waits at landfills after BKK closes.

Commissioner Hedlund thinks that people will separate their garbage, and that recycling will be successful. Subsidizing recycling would be good to change behavior so they don't need to subsidize in future.

Commissioner Massarotto wants West Covina to implement a program similar to successful programs at other cities. He stated that we know that the problem exists and we need to educate the public to solve the problem. With the many reports and studies that have been made on recycling to comply with AB939, the solution just requires implementation and educating the public. He recommends that the Commission report to the City Council that they need to look at this issue.

Hike Miller described issues that make recycling hard, such as lack of uses for the recycled product and a lack of government dollars to subsidize recycling. Cities need to think of the easiest and cheapest way to comply. In West Covina, recycling would require a third container and a new rate structure. Although the City is not actively pursuing MRF's, it will accept and review offers. Hike told the Commission that they should not be discouraged. The Commission and staff should be ready to respond with ideas when the opportunity presents itself.

The consensus was that the Commission is dissatisfied with the City Council's actions (or lack of actions) regarding recycling.

Commissioner Ketteringham would like to see some response from the City expressing sorrow that Ralphs and its recycling center closed. He would like to see Ralphs consider their commitment to recycling in West Covina.

Hike Miller stated that many communities are facing the same issue

because many supermarkets with recycling centers are closing. Other stores can't handle this because reverse vending machines require space.

Commissioner Ketteringham recommends that the EARP subcommittee look at what is being done in the community for recycling.

VI. UPDATE ON BKK OPERATIONS, CLOSURE AND OTHER MATTERS

Oral report was provided by Mike Hiller. The City is in the process of receiving a conceptual grading plan, drainage plan, and a landscaping plan as required by the agreement and is inspecting the landfill weekly. There is a higher probability that near the north end of the haul road to the Class III Landfill there is leachate from the Class I disposal unit. Leachate is also in the wells between the Class I and Class III disposal units. Agencies are insisting BKK correct the problem at this boundary.

Mandatory settlement on the business license tax is going to court on March 27, 1996. The trial date is set for April 4, 1996. The Civil Rights suit depositions are being taken in early April.

Some discussion followed on expanding the electrical generation system. West Coast Cogeneration may be sold to another company who will expand to maximize electrical generation with a modified diesel engine that would burn methane from the Landfill. A discussion followed about the landscaping of the BKK with suggestions on how to enhance the soil and type of vegetation.

VII. INTEGRATED WASTE MANAGEMENT ACTIVITIES

Oral report provided by Mike Hiller. The Sacramento Superior Court ruled that yard waste used as alternate daily cover for landfills is disposal, not diversion. The decision is currently being appealed by the Integrated Waste Management Board and a spot bill has been introduced in the Assembly addressing this decision. It is undecided whether the measurements for the past year (1995) will be counted as disposal instead of diversion.

The Los Angeles County Urban Task force is looking for sites for composting in the County. It is possible some oil lease land could be used.

The City's consultant is auditing the past 3 quarters of the County's waste data. Preliminary measurements indicate that the City would reach its 25% goal with the current activity. The issue of unassigned waste has not yet been addressed. The 4th quarter report will be sent to the City next week.

VIII. COUNTY INTEGRATED WASTE MANAGEMENT PLAN AND SITING ELEMENT

Written and oral report provided by Mike Hiller. The Commission was provided excerpts of the County's Plan and Summary, which was created by a countywide Integrated Waste Management Task Force as required by the State waste management mandate. The summary contains information on all programs in the County, the Countywide Element lists possible landfill sites. Complete copies are available in the Library, City Manager's office, and Environmental Services Department. Any comments must be received by the County by May 1, 1996. The final form of the

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plan will then require approval of a majority of the cities with a majority of the population.

Commissioner Polich requested that this item be agendaized for the next meeting to take comments on the plan to forward to the County.

IX. AIR QUALITY UPDATE

Oral report provided by Mike Hiller. The City is researching the creation of an electric vehicle demonstration project and charging facility. San Gabriel Valley has been identified as a Clean Cities corridor for electric vehicles.

X. PUBLIC COMMUNICATIONS

Jean Arneson spoke on Proposition 65 and the landfill. She noted the area shaded on the published map in the paper was smaller. Also, she requested that the April 9th meeting at the Senior Citizens Center be on cable television.

Mike Hiller responded that he would contact WCCT requesting that the meeting be televised.

Royal Brown spoke on the county's compliance with AB939, the L.A. County Siting Element, Proposition L, San Bernardino County and recycling. He also expects that the yard waste decision will not be overturned and the Commission should agendaize this issue to identify alternatives for diverting yard waste.

XI. OTHER MATTERS

Southern California Association of Governments Energy and Environment Committee Agenda was provided to the Commission.

Commissioner Massarotto reported that on March 30 and 31, the San Gabriel Valley Learning Center is sponsoring a 25th Anniversary wildflower walk showing California native plants. The walk will be at 3160 East Del Mar Blvd., Pasadena.

Vice-Chair Hedlund requested the status of 261 N. Orange, West Covina, which has unfinished construction. Mike Hiller did not have any additional information on that property.

Commissioner Ketteringham requested that Mike Hiller introduce his new assistant. Mike Hiller introduced Kelly Tong, new staff member in Environmental Services. Sharon Gardner has rotated to Personnel. The Commission welcomed Kelly.

Commissioner Polich expressed his dissatisfaction with Lillian Kelly's Addendum Health Risk Assessment of the BKS Landfill. He distributed his comments on the study to the Commission. Commissioner Polich requested that the study be agendaized for the next meeting.

Mike Hiller reported that the Interagency Steering Committee Open House will be on May 4, 1996 tentatively set at the St. Martha's Episcopal Church Parish Hall on Lark Ellen Avenue. Another is set tentatively for August.

XII. ADJOURNMENT

Motion by Ketteringham, second by Massarotto, to adjourn at 10:34 P.M.



June 17, 1996

Mr. Harry W. Stone
Los Angeles County Department of Public Works
Environmental Programs Division
PO Box 1460
Alhambra, CA 91802-1460

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JUN 18 1996
ENVIRONMENTAL PROGRAMS
DIVISION

Subject: Preliminary Draft of the Los Angeles County Siting Element, Draft Summary of the Countywide Integrated Waste Management Plan, and Related Environmental Documents; Comments

Dear Mr. Stone:

The City of Baldwin Park has completed its review of the subject documents. We have the following comments on each subject document.

Our review has concluded that the Summary Plan does not adequately integrate the programs planned and implemented within the Countywide jurisdictional boundaries. We are concerned that the document appears to simply list the various programs identified in the SRRE, but may not actually reflect the changed conditions and contingencies implemented by the different jurisdictions. Not only is there a lack of integration, but the document appears to just be a summary, rather than a plan. There is no attempt to suggest mechanisms to coordinate activities to maximize the positive impacts of programs, nor is there any attempt to plan activities in a way that conserves scarce financial resources. There appears to be no attempt to address the issue that the County retains a funding source (fees from disposal sites) that is not shared with the cities in any significant way.

Our review of the Siting Element and environmental impact documents likewise criticizes the absence of a coherent approach to integrate disposal capacity on the basis of watersheds. The identification of potential disposal sites appears limited to landfills, and there is no identification of alternative disposal technologies including composting and transformation. Nor does the Element address new and developing relationships among waste facilities providers for securing long term contracts at low investment costs with several large haulers, and how such relationships could affect long term disposal capacity.

C10.1

C10.1 Please refer to Topical Response #9.

C10.2

C10.2 Please refer to Topical Response #14.

C10.3

C10.3 Please refer to Topical Response #3 and #9.

C10.4

C10.4 Please refer to Topical Response #11.

The likelihood of a few cities being able to derail the Element by vigorously opposing certain landfill sites also suggests that the Element was developed without adequate input from cities within the County. The County should find a mechanism for all 88 cities and the County to actively participate in the development of an integrated waste management plan.

To that end, this City supports a total revamping of the Siting Element and Summary Plan by first creating or using the existing subregional city groupings (re: the Southeast-South Bay Group, the ESGV Group, etc.) to hold open forums for the collection of input on local needs, desires, and developments. Groups could select representatives to work with or on the Local Task Force (LTF) to develop appropriate coordinated programs and policies for a Countywide Plan and Element. These representatives could either supplement or replace the existing LTF. In addition, it is important that the LTF be opened to more representatives from the private sector and the citizenry as they are most affected by the plan and element.

In this revised LTF, new or supplemental waste diversion and management policies and programs could be drafted that would address how the cities and the county in Los Angeles County can work together to meet the AB 939 mandates. Even if this means that some cities continue to act sub-regionally, there would be a meeting of the minds and a action plan that truly represented this great metropolitan area.

If you have any questions or need further information, please call Robert Roessler at (818) 813-5208 or Michael Huls, R.E.A. at (818) 969-7816.

Sincerely,



Carl Yeats
Director, Administrative Services

D-1/4

CITY OF BURBANK
PUBLIC WORKS DEPARTMENT
FAX

number of pages including cover - 1

Date: June 18, 1996

FROM: Michael J. McHinch Administrative Analyst 500 South Flower Street Burbank, CA 91502-2106	TO: Michael Mohajer County of Los Angeles Department of Public Works
PHONE: (818) 238-3905 FAX: (818) 238-3908	PHONE: (818) 458-3502 FAX: (818) 458-3569

SUBJECT: COMMENTS RE: REVIEW OF COUNTYWIDE SITING ELEMENT, DEIR, PLAN, AND NEG. DEC.

Countywide Siting Element: On page 3-10 of the draft and on pages ES-6 and 2-7 of DEIR, the correct phone number for the Burbank landfill is (818) 238-3888. In the Plan Appendices, the correct phone number for the Recycling Coordinator is (818) 238-3900, and the fax number is (818) 238-3908.

Summary Plan: Regarding Table 2-1, there should be Xs in every box except under Regional Composting Facility and Compost Market Development. Table 4-1 should say 29 permitted haulers. Regarding Tables 5-1 and 5-2, there should be Xs in every box except Disposal Fee Modifications, Loans and Grants, Taxes and Fees, Land Use Incentives, and Product or Packaging bans. Regarding tables 5-3 and 5-4, there should be Xs in every box except Free Market Service Provision, On Site Salvaging, Mandatory Participation Disposal Ban, Cooperative Marketing, Service Rate Incentive, and Infrastructure Investment Incentive. Regarding Tables 5-5 and 5-6, there should be Xs in every box except Drop-off/Storage, Manure Program, Municipal Compost Facility, Intermediate Processing Facility, Municipal Procurement Guidelines and Disposal Restriction/Landfill Ban. The comments for table 5-6 should read "existing activities include municipal greenwaste curbside pickup and delivery to a private compost facility and macroscopes, on display at Recycle Center". Regarding Table 5-7, add comment "T: municipal affiliate of Crown Disposal (CRRR) contracts with supermarkets for organic waste to use in composting. Regarding Table 5-12, under R, add tin cans and bi-metal. Regarding Table 5-14, move X from Periodic Collection City to Countywide Program; delete Xs under Door-to-Door Collection and Load Check (City Facility); and delete Comments. Regarding Table 5-15, under heading All Materials Collection Program delete Xs under Permanent Facility and Door to Door Collection; and remove the following sentence under Comments "City will phase out collection events when the permanent facility is built." Regarding Table 5-16, under Newsletter add S.C. under Radio/TV PSAs delete S.C.; under Video and Slide Show, Presentations and Workshops, Community Events Exhibits and Displays, HHW Collection Event and Inter-Jurisdictional Coordination, add S.C. Regarding Table 5-17, delete S.C. under Radio/TV PSAs, and under Comments delete "Multi-Family on-site education program, (remaining comments OK). Regarding Table 8-1, under Countywide HHWE Program, list Yes.

Please contact Steve Maggi, Recycling Coordinator, at (818) 238-3900 if you have any questions.

C11 Change made.

SPD

CITY OF Glendale CALIFORNIA

DZ/CA
2

633 East Broadway, Room 208, Glendale, CA 91206-4385

(818) 548-3800
Fax (818) 546-2207

June 12, 1996

Director of
PUBLIC WORKS

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

RECEIVED
JUN 18 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

Dear Department of Public Works:

Thank you for the opportunity to comment on the Preliminary Draft of the Los Angeles County-wide Siting Element and Draft Summary Plan of the County-wide Integrated Waste Management Plan (1/96).

Major changes have occurred in the field of solid waste management since the last County Plan was adopted over ten years ago. In particular, individual cities were given the responsibility of meeting a very difficult fifty percent waste diversion mandate by the year 2000.

In order to assist the cities in meeting this mandate, State law provides an important role for the Summary Plan, as prepared under the leadership of the Los Angeles County Integrated Waste Management Task Force. As stated on page 1-2, among the goals of the Summary Plan is to go beyond a summary of the SRRS, HHWES, and NDFEs by establishing "County-wide goals and objectives for integrated waste management" and describing "programs that could be consolidated or coordinated County-wide, and how these County-wide programs are to be financed."

It has been difficult in the limited time for public review of the Summary Plan for the City of Glendale to adequately consider the proper role for the County and the Local Task Force in meeting the goals of AB 939. It is our understanding that a number of parties are requesting a 120 day extension in the public comment period. The City of Glendale, Public Works Division, supports that request in order to allow more time for detailed discussions with the 88 local cities on how consolidated or coordinated County-wide programs can assist local jurisdictions in meeting the goals of AB 939.

Sincerely,

Kerry L. Morford
Kerry L. Morford
Director of Public Works

KLM:TB:rm



C12 C12
The public review period was extended to October 17, 1997. Please refer to Topical Response #7 for further discussion.



CITY OF
SANTA MONICA
CALIFORNIA

Craig Perkins
Director of Environmental and
Public Works Management Department

June 12, 1998

1685 Main Street, P.O. Box 2200
Santa Monica, CA 90407-2200
(310) 438-8221 Fax (310) 576-3598

Don Wolf, Deputy Director
Los Angeles County Public Works
P.O. Box 1460
Alhambra, CA 91802-1460

Dear Mr. Wolf:

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JUN 18 1998

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

This letter is a request that you extend the public comment period for Draft Los Angeles Countywide Siting Element, Solid Waste Summary Plan of the Integrated Waste Management Plan and Draft EIR for the Siting Element, issued by your department.

The documents represent critical steps in providing Los Angeles County with a feasible, long-term solid waste policy, plans and programs and in satisfying the requirements of California Integrated Waste Management Act of 1989 (AB 939). Given their importance, I urge you to add a one hundred twenty day extension to the current close of public comment of Monday, June 17th. This would extend the public comment period until October 17, 1998. I congratulate you on having already extended the public comment period thirty days.

It is my view based on discussions with some of the public stakeholders that more time is required to generate positive changes and remedy deficiencies in the documents. As I am sure you would agree, it is the outcome of the review and comment process that is important not the satisfaction of any schedule per se.

An extension would allow a wide variety of stakeholders in solid waste policy to have sufficient time to fully analyze and comment on the Plan.

It is essential that the process of public review and comment not be foreshortened prematurely. A time extension could lead to improvements in the documents, ensure their credibility, and improve their chances of being widely accepted. I know that you wish to provide adequately prepared

C13 Please refer to Topical Response #7.

C13

C13

documents to the Los Angeles County Board of Supervisors and subsequently to the eighty-eight (88) cities, including Santa Monica, for their approval.

Thank you in advance for your assistance with this very important matter.

Sincerely,



Craig Perkins, Director
Environmental & Public Works Management

cc: Supervisor Zen Yaroslevsky
Supervisor Deanne Dana
Supervisor Mike Antonovich
Supervisor Yvonne Burke
Supervisor Gloria Molina

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FAX: (213) 588-2761

KENNETH J. DeDARIO
Director of Light & Power

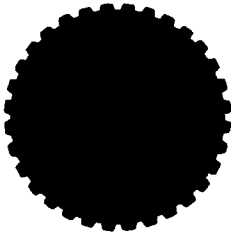
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DAVE TELFORD
Fire Chief

FAX: (213) 581-1385

LOUIS ROSENKRANTZ
Police Chief

FAX: (213) 581-1178



CITY HALL

4305 SANTA FE AVENUE, VERNON, CALIFORNIA 90058

TELEPHONE (213) 583-9811

ENVIRONMENTAL HEALTH DEPARTMENT

June 17, 1996

Los Angeles County Department of Public Works

Environmental Programs Division

P.O. Box 1460

Alhambra, CA 91802-1460

Attn: Mike Mohajer

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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 alternatives 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.

C14.1	C14.1	Comment noted.
C14.2	C14.2	Comment noted.



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 6-8, § 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 Nondisposal Facility Element (NDFE) for the city have identified this site. Please explain the source of this information.

C14.3	C14.3	Please refer to Topical Response #12.
C14.4	C14.4	Refer to Glossary of Terms in the Final Draft CSE.
C14.5	C14.5	Refer to Glossary of Terms.
C14.6	C14.6	Comment noted.
C14.7	C14.7	Composting facility is not considered as a disposal facility
C14.8	C14.8	Comment noted.
C14.9	C14.9	This comment is acknowledged.
C14.10	C14.10	Although this facility is not identified in the City's SSRE and NDFE, they are operating in the City of Vernon. See final CSE.

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-(78): 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-(108): 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. Pozzebon,
Director/Health Officer

c: Bruce Malkenhorst, City Administrator

C14.11

C14.11 This comment is acknowledged.

EPD



June 12, 1996

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JUN 18 1996
 DEPARTMENT OF PUBLIC WORKS
 ENVIRONMENTAL PROGRAMS

Mike Mohajer, Assistant Division Engineer
 Los Angeles County Department of Public Works
 Environmental Programs Division
 900 South Fremont Avenue, Annex Building
 Alhambra, CA 91803-1331

Dear Mr. Mohajer:

The Westside Cities Solid Waste Management Committee representing the cities of Beverly Hills, Culver City, Santa Monica and West Hollywood respectfully request that the County extend the public comment period on the Draft Countywide Siting Element, Solid Waste Summary Plan of the Integrated Waste Management Plan and Draft EIR for the Siting Element which were issued by the County Department of Public Works.

We are aware that one extension has already been granted, but we feel the issue of solid waste disposal needs additional time for study in a county of this size and that by extending the comment period it is possible to work out some long range solutions that will be able to cope with the future municipal solid waste and recycling requirements of this vast county. We have discussed the Plan with other cities and will be able to solicit input from a great breadth of opinion and expertise in order to help improve the existing documents.

Although it is obvious the documents reflect a great deal of work, we feel they are not complete as they stand at this moment. The Siting Element needs further work to expand options that would mitigate the need for as much capacity as indicated in the document and the ever-present question of where additional landfill space should be are but two areas that require further focus, with more creative and innovative alternatives.

Additionally, in the Summary Plan, the County could have pulled together some of the far-reaching concepts in the Source Reduction and Siting Elements of the individual cities and worked them into a creative whole encompassing programs for all 88 cities in Los Angeles County complete with a county-wide support program.

C15.1 Please refer to Topical Response #7.

C15.1


C15.2


C15.2

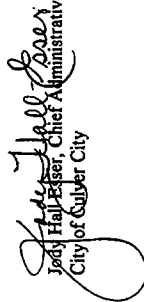
This comment does not pertain to an issue of environmental impact. Please refer to the Final Draft Los Angeles County Countywide Siting Element, Volume II-Appendices, Part I.

With an additional 120 days, putting the final comment period close in October, a truly useful document could be produced.

Thank you for your understanding and cooperation.


Mark Scott, City Manager
City of Beverly Hills


Craig Perkins, Director
Environmental and Public Works
City of Santa Monica


Jody Hall-Esler, Chief Administrative Officer
City of Culver City


Paul Brogan, City Manager
City of West Hollywood



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JUN 17 1996

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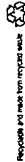
Ginger Bremberg, Chair
Los Angeles County Integrated Waste Management Task Force
P.O. Box 1460
Alhambra, California 91802

**COMMENTS ON THE PRELIMINARY DRAFT COUNTYWIDE SITING ELEMENT,
DRAFT ENVIRONMENTAL IMPACT REPORT AND SUMMARY PLAN**

The comments submitted to the Integrated Waste Management Task Force by the Bureau of Sanitation will focus on technical and feasibility issues associated with the Preliminary Draft Countywide Siting Element (CSE), Summary Plan, and Draft Environmental Impact Report (Draft EIR). The CSE and Summary Plan compress an enormous amount of information into one relatively small set of documents. We commend the staff preparation and analysis of the sheer volume of data that was submitted to them in the Source Reduction and Recycling Elements (SRRE), Household Hazardous Waste Elements (HHWE), and Non-Disposal Facility Elements (NDFE) from the 89 jurisdictions in the County. Our comments will focus primarily on the CSE and the projections and plans for disposal capacity in Los Angeles County.

On June 12, 1996, the Los Angeles City Council voted to adopt a report from the Environmental Quality and Waste Management Committee requesting that the County remove Lopez Canyon, Mission-Rustic-Sullivan Canyons, and the expansion of Sunshine Canyon Landfill into the City as potential sites for landfill disposal from the CSE.

The Bureau of Sanitation has two major areas of concern in the CSE. First, the CSE uses only two scenarios to examine waste management capacity issues in its 'Time to Crisis Analysis': all or nothing, and relies on 'time to crisis' analysis assumptions which may be misleading. Second, the CSE completely discounts export of waste as a planning factor in the next 15 years, treating infrastructure and remote siting issues as insurmountable obstacles. Other specific comments follows these general comments.



C16.1

Lopez Canyon Landfill expansion has been removed from further consideration in the CSE

The Mission-Rustic-Sullivan canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

State law, Sections 41711 and 41712 of California Public Resources Code, requires that sites such as the Sunshine Canyon Landfill expansion within the City of Los Angeles

C16.1

boundary, which are identified as "tentatively reserved" in the CSE, must be removed from the document if they are not brought into consistency with the jurisdiction's General Plan by the first five-year revision of the Countywide Integrated Waste Management Plan.

C16.2

Please refer to Topical Response #6 for further discussion.

C16.3

Please refer to Topical Response #9.

C16.3

Please refer to Topical Response #3.

The Time to Crisis Analysis, as presented in the CSE in Scenario A, shows that, if no expansions or new landfills are permitted within Los Angeles County, then a 'shortfall' will exist in 1999. In this scenario, Bradley Landfill is shown to close in early 1999. Waste Management Recycling and Disposal Services of California, Inc., has a contractual agreement with the City to accept City refuse for five years beginning July 1, 1996. The owner/operator of the Bradley Landfill has also confirmed to our staff that the facility has capacity at 7,000 tons per day for five more years. Therefore, this facility will be available, based on conservative estimates, until January 2001. This then could push the actual 'crisis' date back to 2001.

Is the 'surplus' which currently exists in the solid waste disposal system on a daily basis reflected in the projections for the document? For example, Asuza-Western Landfill is permitted for 6,000 tons per day as shown in the CSE. The operator, however, is limiting the inflow to approximately 1,000 - 1,500 tons per day. Thus the capacity available in the facility will not be exhausted by 1997. The daily 'surplus' could be rolled over to accurately reflect the use of landfills in the region, as the maximum permitted daily capacity for some facilities is not being fully utilized.

Scenario B shows a plethora of landfill expansions and openings that result in landfill capacity which is three times the projected disposal needs for the year 2005. Realistically, if the targeted expansion of existing landfills take place, then none of the four 'Potential New Landfills' included in Scenario B (Blind, Elsmere, Mission-Rustic-Sullivan and Towsley) are necessary to ensure adequate capacity for the 15 year planning period. Using the CSE's estimates of waste disposal needs, the Bureau believes that a more pragmatic approach is to assume the expansion of those facilities which have achieved reasonable progress in their expansion plans and to then include the export of a percentage of the refuse in the year 2001. A third Scenario, which the Bureau requests be included in the Final CSE, should include the following items:

- (1) Bradley Landfill remaining open for refuse disposal to January 2001;
- (2) The successful expansions of Chiquita Canyon (possibly at some reduced rate if appropriate), Antelope Valley, Lancaster and Puente Hills;
- (3) The inclusion of out of County disposal facilities, serviced by either truck or rail haul (discussion follows), for an amount of refuse which equals at least 5% of the total daily disposal needs beginning in 2001 and increasing to at least 10% by 2005. This percentage should continue to increase as more refuse is moved out of Los Angeles County by truck or rail;
- (4) The removal of Lopez Canyon, Mission-Rustic-Sullivan Canyons, and the expansion of Sunshine Canyon into the City of Los Angeles from the projections.

Although the requested third Scenario leaves less flexibility and excess capacity, it will be valuable as a tool to show the results of lessening local capacity and increasing exportation within a fifteen year planning period.

C16.4 Please refer to Topical Response #9.

C16.5 Please refer to Topical Response #9.

C16.6 Please refer to Topical Response #9.

C16.7 Please refer to Topical Response #9 and #6.

The potential for the export of refuse to other jurisdictions is available now. Options are available which can be utilized to reduce the County's need for local landfill capacity. Although these alternatives are more costly than local capacity, they should be presented in the CSE to truly include all alternatives for refuse disposal needs. The options and information presented below have been proposed to the City of Los Angeles through a Request for Proposal process recently completed by the City and through discussions of future plans with companies involved with refuse management and disposal. The Bureau believes that remote disposal is feasible. Expanding existing transfer facilities and siting new facilities within the County may be a long lead time process, but may be more feasible than the development of new landfills in an increasingly urban environment. Even in our current situation (without convenient rail-loading facilities), at least two out of County landfills are available for disposal, have excess capacity, and can be utilized immediately if necessary.

The two facilities which are available by transfer truck and have been proposed to the City for use are the El Sobrante Landfill in Riverside County and the Frank Bowerman Landfill in Orange County. Both are approximately 60 miles from downtown Los Angeles and may be reached by utilizing existing transfer facilities. The El Sobrante Landfill is in the final stages for approval of a major expansion, which would allow the facility to accept waste generated outside of Riverside County. The Bowerman Landfill is permitted and open, and existing excess daily capacity at the facility has been purchased from the County of Orange by a private refuse company.

The City has also received several proposals to expand existing transfer facilities to include rail service and to build new transfer facilities which would include both truck and rail capabilities. These proposals, for the most part, are appropriately located and zoned, and already have existing solid waste facilities permits which allow transfer at the proposed sites.

Specific comments regarding the City Council action of June 12, 1996 in the CSE. Draft EIR, and Summary Plan:

Comment #1: In Table ES-1 of the Summary Plan, Goal 6 reads "Assure adequate long-term solid waste disposal capacity for the cities and County unincorporated areas." This goal is consistent with adopted City policy. Goal 6, underlying policies, and references to development of the landfills for which the City Council has adopted policies concerning viability found throughout the CSE, Summary Plan and Draft EIR.

However, the first Policy under this goal is proposed as "The County and the 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 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."

C16.8 C16.8 Please refer to Topical Response #3.

C16.8

The City requests that this policy be deleted from the Summary Plan, as the 1988 plan is outdated and includes Lopez Canyon, Mission-Rusitic-Sullivan Canyons, and the expansion of Sunshine Canyon into the City as potential landfill sites.

A more general policy which would recognize the potential for export to other counties and possible other states, the development of infrastructure for recycling and transfer, and reasonable expansion of existing facilities would be more appropriate. The CSE discusses these issues, and discusses the 1988 Action Plan, but the policies are not included in the Summary Plan. Suggested policies may include:

The County and the cities in Los Angeles County will support the development of infrastructure for solid waste transfer and rail-loading as well as the expansion of existing disposal facilities, provided that they are environmentally safe, technically feasible, and publicly acceptable.

The County and the cities in Los Angeles County will actively seek and identify remote disposal opportunities (or restate Objective #6 in Draft EIR).

Comment #2: Please update the Summary Plan using the attached Draft NDFE submitted by the City of Los Angeles.

The following chart identifies the areas where our proposed changes should be incorporated:

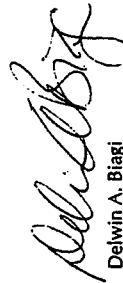
SPECIFIC COMMENTS		
Comment number	Page Number	Comment
CSE1	ES-11	In Table ES-4, remove references to Lopez Canyon, Mission-Rusitic-Sullivan Canyons, and Sunshine Canyon (inside the City).
CSE2	ES-12	Remove Lopez Canyon from the Reserved List and Mission-Rusitic-Sullivan Canyons and Sunshine Canyon from the Tentatively Reserved List
CSE3	ES-14	The list of potential facilities should be altered to remove references to Lopez Canyon, Mission-Rusitic-Sullivan Canyons, and Sunshine Canyon (inside the City).
CSE4	2-2	Third bullet should be removed.
CSE5	2-3	The statements "The expansion of Lopez Canyon Landfill in the City of Los Angeles" and "The expansion of the Sunshine Canyon Landfill located in the northern San Fernando Valley, within the City of Los Angeles..." should be removed.

C16.9	C16.9 through C16.11 Please refer to Topical Response #6.
C16.10	
C16.11	
C16.12	C16.12 Comment noted.
C16.13	C16.13 Please refer to Topical Response #6.

Comment number	Page Number	Comment
CSE6	6-4	Remove references to Mission-Rustic-Sullivan Canyon.
CSE7	6-5	Remove Lopez Canyon and Sunshine Canyon from list of potential expansions.
CSE8	6-7	Remove discussion of Lopez Canyon Expansion.
CSE9	6-8	Remove discussion of Sunshine Canyon Landfill Expansion.
CSE10	6-13	In Table 6-1, remove references to the three landfill projects listed above.
CSE11	6-18	Remove Table 6-4
CSE12	6-28	Remove Table 6-9
CSE13	6-32	Remove Table 6-11
CSE14	7-3	Remove reference to Lopez Canyon Landfill Expansion
CSE15	7-4	Remove Mission-Rustic-Sullivan Canyons and Sunshine Canyon from the Tentatively Reserved List
CSE16	7-3/7-6	Remove the references to the three landfill projects discussed above
DEIR1	ES-7	In Table ES-2, remove references to Lopez Canyon, Mission-Rustic-Sullivan Canyons, and Sunshine Canyon (inside the City).
DEIR2	2-8	Same as previous comment
SP1	ES-13 & 2-5	Delete reference to 1988 Action Plan. Include policies from CSE

If you have any questions concerning the general or specific comments, please contact Karen Coca of my staff at (213) 847-3366.

Sincerely,



Delwin A. Biagi
Director

cc: Ron Deaton, CLA
Drew Sones

Page 5 of 6

C16.14
C16.15
C16.16
C16.17
C16.18
C16.19
C16.20
C16.21
C16.22
C16.23
C16.24
C16.25
C16.26
C16.27

C16.14 through C16.18
Please refer to Topical Response #6

C16.19 Please refer to Topical Response #6 & Table has been deleted.

C16.20 through C16.22
Change Made

C16.23 through C16.26
Please refer to Topical response #6.

C16.27 Please refer to Topical Response #13.



CITY OF GLENDORA CITY HALL (619) 914-9201
116 EAST FOOTHILL BLVD., GLENDORA, CALIFORNIA 91740

June 13, 1996

RECEIVED

JUN 24 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

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

Subject: Commentary and suggestions on the Preliminary Draft of the
Los Angeles County Countywide Siting Element and
Preliminary Draft Summary Plan of the Countywide Integrated
Waste Management Plan.

Dear Mr. Stone,

After reviewing the Preliminary Draft Siting Element and Summary Plan, we find several areas of concern and offer the following comments and suggestions.

The Summary Plan will be appreciated as a resource document, containing a great deal of useful information such as a listing of all composting facilities in the region. However, it does not give any clear indication on how to coordinate or consolidate the multitudes of programs to develop an efficient regional approach to waste management.

Suggestion: The county needs to develop an integrated waste management plan which:

- creates a cooperative framework which invites all cities, districts and businesses and citizens to accept responsibility for solutions,
- documents where and what wastes are produced,
- develops a coordinated program for source reduction, recycling, composting and education and
- develops and promotes recycled products marketing strategies.

The Siting Element has identified a number of landfill sites which are highly controversial. Opposition to those sites (especially Blind Canyon, Elsmere Canyon, Towsley Canyon and Mission/Rustic-Sullivan Canyons) may lead to the rejection of the entire element.

C17.1 Please refer to Topical Response #6.


C17.1

P R I D E O F T H E F O O T H I L L S

Suggestion: The county should adopt a cooperative approach to identifying potential landfill sites. If all jurisdictions were invited into the planning process from the beginning a common frame of reference could be established which would insure that individual needs and requirements were honored and responsibility for solid waste management would be shared more equitably.

Please keep me informed on your progress. If you have any questions or require further information, please call Dianne Herring, 818-914-8200 x 303.

Sincerely,



Arthur E. Cook,
City Manager

C17.2 Please refer to Topical Response #11.

210
D/K

CITY OF LOS ANGELES
CALIFORNIA



ENVIRONMENTAL AFFAIRS
DEPARTMENT
LILLIAN Y. KAWASAKI
GENERAL MANAGER
201 NORTH FIGUEROA STREET
SUITE 1000
LOS ANGELES, CA 90012
(213) 560-1040

ENVIRONMENTAL AFFAIRS
COMMISSION
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ANNE SHERIDAN
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TOD A. BURNETT
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RICHARD J. RIORDAN
MAYOR
June 18, 1996

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JUN 25 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

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

Subject: Los Angeles County Countywide Siting Element and Draft Environmental Impact Report; and County wide Integrated Waste Management Summary Plan and Proposed Negative Declaration

Dear Mr. Mohajer:

Thank you for the opportunity to review the Countywide Siting Element, Integrated Waste Management Summary Plan and their respective environmental documents. The Environmental Affairs Department of the City of Los Angeles is the Local Enforcement Agency (LEA) for solid waste facilities within the City of Los Angeles.

- CallMat Inert Landfill (19-AR-1160) and Strathern Inert Landfill (19-AR-1016) are both located within the City of Los Angeles and are exempt from state solid waste facility permits. However, these sites are permitted by the City of Los Angeles and are open to receive inert wastes. They should be listed in the siting element for informational purposes.
- Lopez Canyon Landfill is listed in tables ES-4 Potential Expansions of Existing Facilities. The Los Angeles City Council has determined that Lopez Canyon Landfill will close July 1, 1996.
- Section 8.6.1 of the Countywide Siting Element incorrectly identifies Central L.A. Recycling and Transfer Station as owned and operated by Browning Ferris Industries (BFI). The solid waste facility permit shows BLT Enterprises as the owner and operator of the Central L.A. Recycling and Transfer Station (SWIS # 19-AR-1182). BFI is contracted by BLT to operate the facility.

If you have any questions, please contact me at (213) 560-1070.

Very truly yours,

Joe Maturino
Joe Maturino
LEA Program Manager

c: Lupe Vela, ISWMO
Del Blagi, BOS
Barb Garrett, CLA

JM 06-09-06-156

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

C18.1	C18.1	Please refer to Topical Response #4 and #9.
C18.2	C18.2	Please refer to Topical Response #6
C18.3	C18.3	Comment noted.

Public Works
25663 W. Ave. Stamford
Santa Clarita
California 91355-1103
Phone
(805) 284-2500
Fax
(805) 284-2517



June 17, 1996

Sent via FAX and Certified Mail
Return Receipt Requested

City of
Santa Clarita

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

Re: Comments on the Preliminary Draft Countywide Siting Element (CSE) for the development of adequate disposal capacity in the County of Los Angeles

Dear Mr. Stone:

Thank you for the opportunity to review and comment on the Preliminary Draft Countywide Siting Element (CSE). The City of Santa Clarita is committed to finding environmentally safe methods to properly handle waste.

The City of Santa Clarita has reviewed the Countywide Siting Element (CSE). There are qualitative and quantitative inaccuracies with the information provided in the document specifically pertaining to the goals, policies, current disposal rate and future disposal capacity needs. The City's comments are arranged in order by the corresponding chapter in the CSE.

CHAPTER 1 - INTRODUCTION

The CSE refers to the Los Angeles County Solid Waste Management Action Plan that has been instituted by the L.A. County Board of Supervisors. The goals, objectives, and components of this Action Plan should be stated and discussed in the CSE. The CSE should also show the relevance of the data contained in that report to the current disposal and waste disposal trends in the County.

CHAPTER 2 - GOALS AND POLICIES

The stated goals are ambiguous and noncommittal. The suggested policies/strategies to achieve these goals contradict the desired results. For example:

The intent of goal 2.4.1 is to protect the health, welfare, and safety of all citizens by addressing the disposal need in the County. However, the identified policies support

C19.1

C19.1 Please refer to Topical Response #13.

C19.2

C19.2 The policies in Section 2.4.1 of the Final Draft CSE have been revised to further clarify the goal in regards to the objectives of the CSE. Please to Topical Response #10 for further discussion.



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Mr. Harry W. Stone, Director
Los Angeles County Dept. of Public Works
Countywide Siting Element
June 17, 1996 - Page 2

the creation of new landfills and the expansion of existing landfills. Documented cases demonstrate environmental pollution resulting from effects of a landfill. A policy strategy to evaluate health, safety and environmental effects of landfills versus alternative waste management technology should be pursued prior to supporting any disposal technology. A recent decision by the City of Los Angeles to deny the expansion of the Lopez Canyon landfill demonstrates that the public and their elected representatives agree that landfills are a detriment to public health and safety. The purpose of goal 2.4.2 appears to serve the narrow interests of a disposal-based industry. If the goal is to protect the economic well-being of Los Angeles County, a broader cross-section of private/public economic stakeholders that advocate waste prevention and disposal based industry should be supported. Policies to carry out this goal should be specific to the economic development of both industries. This should be accomplished through proactive interaction with the appropriate County and State agencies designated to stimulate the local economic growth.

Goal 2.4.3 relating to the siting criteria for solid waste disposal facilities is too broad in scope. The term "environmentally safe and technically feasible" should be clearly explained and be consistent with the definitions outlined in the State and Federal standards. The definitions should also conform to the environmental standard set by the host jurisdiction and adjacent communities.

The policies established for goal 2.4.4 are vague and do not provide substantive objectives which will achieve reduction in solid waste.

Goal 2.4.5 alludes to assisting jurisdictions in siting solid waste disposal/transformation facilities and alternative waste management facilities. While this goal is commendable, the policies identified are totally inadequate. They do not appear to reflect a true commitment towards the established goal. The policies should also reflect a commitment to the waste management hierarchy established by the California Integrated Waste Management Act of 1989 (AB 939).

Goals 2.4.6, 2.4.7, and 2.4.8 address the siting of remote disposal facilities and conservation of space at existing Class III landfills. The stated policies undermine the intent of these goals. The policies do not provide for actions which will successfully achieve the stated goals.

CHAPTER 3 - EXISTING SOLID WASTE DISPOSAL FACILITIES

Considering the recent actions taken by the City of Los Angeles on their waste management policy, facts contained in this chapter are antiquated. The CSE should reflect current information.

C19.2 (cont'd)

C19.3 Please refer to Topical Response #11.

C19.4 Please refer to Topical Response #1.

C19.5 Please refer to Topical Response #1.

C19.6 Please refer to Topical Response #2.

C19.7 The Final Draft CSE reflects the closure of Lopez Canyon Landfill. Lopez Canyon Landfill expansion has been deleted from further consideration in the CSE.

Mr. Harry W. Stone, Director
Los Angeles County Dept. of Public Works
Countywide Siting Element
June 17, 1996 - Page 3

CHAPTER 4- CURRENT DISPOSAL RATE AND ASSESSMENT OF DISPOSAL CAPACITY

The disposal needs projections are high and exaggerate the need for landfill disposal capacity. The siting element assumes that daily permitted capacities are equivalent to the actual amount of waste accepted at landfills. Data to validate this assumption is not presented in the CSE. In addition, waste export to jurisdictions out of the County is underestimated. Private haulers continue to secure contracts with landfills in neighboring counties, which results in significant net exports of waste from Los Angeles County. The current quarterly reporting method used by the County does not provide data that can accurately determine the current disposal trend. Using data based on a known quarterly sampling schedule allows waste disposers to change their disposal location during the sampling period, thus distorting the disposal rate data.

CHAPTER 5- FACILITY SITING CRITERIA

Public participation and education is a very important element for the siting of any facility. The CSE does not provide for a strategy to include the citizens in the decision making process for the siting of disposal/diversion facilities. The CSE should include a public participation policy with specific actions to actively solicit input from County residents.

CHAPTER 6- PROPOSED IN-COUNTY FACILITY LOCATION AND DESCRIPTION

Information included in this chapter appears to fulfill the requirements of Title 14 in the California Code of Regulations. However, the CSE should note that because of potential health and safety hazards the proposed new landfill facilities and landfill expansions will continue to be met with vehement public opposition from residents across the County.

CHAPTER 7- GENERAL PLAN CONSISTENCY

The sites designated as "reserved" for the purposes of the CSE seem consistent with the County and City of Los Angeles General Plans. The General Plans are guides to future development and do not, in and of themselves, present final siting decisions. For example, environmental impact reports for each site may determine that those sites are unsuitable for use as a landfill.

The CSE should emphasize that a portion of the area in Elsmere Canyon is within Federal jurisdiction. The use of this area for a landfill is inconsistent with the Angeles National Forest Land and Resources Management Plan.

C19.8 C19.8 Please refer to Topical Response #9.

C19.9 C19.9 Please refer to Topical Response #11.

C19.10 C19.10 Please refer to Topical Response #6.

C19.11 C19.11 The Final Draft CSE has been revised to show a scaled down Elsmere Canyon Landfill reflecting the Omnibus Parks and Public Lands Management Act of 1996. Please refer to Topical Response #12 for further discussion.

Mr. Harry W. Stone, Director
Los Angeles County Dept. of Public Works
Countywide Siting Element
June 17, 1996 - Page 4

CHAPTER 8- OUT OF COUNTY DISPOSAL FACILITIES

The CSE should reflect recent landfill policies adopted by the governing boards in San Bernardino and Ventura Counties.

CHAPTER 9- FINDING OF CONFORMANCE

The CSE finding of conformance requirements should include a determination of compatibility with the current and future land use in adjoining jurisdictions.

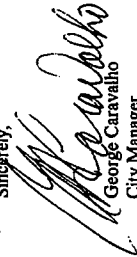
CHAPTER 10- IMPLEMENTATION

A successful implementation schedule for tasks identified in the CSE is dependent on reasonable goals with constructive objectives. The current goals and policies identified in the CSE are ineffectual, because they are created to achieve the goals of an antiquated solid waste management strategy.

The City has provided oral comments at the public meetings on the CSE which were held in Santa Clarita. Those comments should also be included in the official record as comments to the CSE.

City staff is prepared to meet and discuss the comments presented in this letter with you or your staff. Thank you for this opportunity to comment.

Sincerely,



George Caravallho
City Manager

GAC:HJ

cc: Donald L. Wolfe, Deputy Director, Los Angeles County Public Works
Michael Mohajer, Environmental Programs Division

C19.12

C19.12 Please refer to Topical Response #3 and #5.

C19.13

C19.13 Please refer to the Final Draft CSE, Chapter 10, Table 10-1, item 17 regarding demonstrations of Compliance with the General Plan Consistency, and Topical Response #10.

C19.14

C19.14 Please refer to Topical Response #10.

C19.15

C19.15 Please refer to Table 3-1 of the Final EIR for responses to oral comments.



City of La Puente

15900 E. Main Street La Puente, CA 91744 Telephone (818) 855-1500 Fax (818) 961-4656

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

C20 This comment is acknowledged.

s:\admin\letters\stet\miml
Edward L. Chavez
Mayor

Joe V. Aldrete
Mayor Pro Tem

Sally Holguin-Fallon
Council Member

George Gaylan
Council Member

Louis R. Perez
Council Member

Robert G. Gutierrez
City Manager



CITY OF WEST COVINA

Incorporated 1922

File: H
CSE
CSE 11

RECEIVED

OCT - 8 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

October 3, 1996

Mr. Harry W. Stone, Chairman
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force
Los Angeles County Department of Public Works
Environmental Programs Division
P.O. Box 1460
Alhambra, California 91802-1460

Dear Mr. Stone:

Subject: Comments on the Draft Countywide Siting Element

In the text and tables of the Countywide Siting Element, information is provided on the BKK Landfill in the City of West Covina. References are made to the Settlement Agreement between the City and BKK that calls for the closure of the Landfill by September 15, 1996.

All comments in the Siting Element text and tables and any future references to the BKK Landfill should reflect the following:

- A. The BKK Landfill closed their gates to the receipt of any waste at 11:00 AM on Saturday, ^{Sept 14}14, 1996.
- B. On June 1996, the Planning Commission of the City of West Covina approved a revision to the conditions of Unclassified Use Permit No. 71, Revision 5 (Amendment). This action effectively terminated the Landfill's land use entitlement to receive any waste for disposal or any other purposes after September 15, 1996. Planning Commission Resolution No. 03-96-4340 approving Unclassified Use Permit No. 71, Revision 7 memorializes this action. I have attached a copy of this resolution to this letter.

The City of West Covina requests the draft Countywide Siting Element language and references be changed to reflect these facts.

C21.1

C21.1 Comment noted.

C21.2

C21.2 Comment noted. The Final CSE has been revised to reflect this information.

If you have any questions, please call me at (818) 814-8411.

Yours truly,



Michael L. Miller
Environmental Services Director

Attachment — |

CC: City Manager
City Council
Waste Management and Environmental Quality Commission
Planning Commission
Planning Director
Waste Management Enforcement Manager

CoWastePin3
MLM/vjs
10/3/96

2

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PLANNING COMMISSION
RESOLUTION NO. 03-88-4340

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST COVINA, CALIFORNIA APPROVING UNCLASSIFIED USE PERMIT NO. 71, REVISION 7

UNCLASSIFIED USE PERMIT NO. 71, REVISION 7

CATEGORICAL EXEMPTION

PERMITTEE: BKK Corporation

LOCATION: 2210 South Azusa Avenue

WHEREAS, on or about January 17, 1986, the City of West Covina and BKK Corporation have stipulated to a judgment in Superior Court regarding the closure date of the BKK Landfill and entered into an Agreement; and

WHEREAS, the stipulated judgment includes a provision directing that BKK's unclassified use permit be revised to reflect the closure date and the limitations on further operations at the BKK Landfill included within the Agreement; and

WHEREAS, in response to said stipulated judgment and Agreement, the Planning Commission, upon giving the required notice, did on the 12th day of March, 1986, conducted a duly advertised public hearing as prescribed by law; and

WHEREAS, studies and investigations made by this Commission and in its behalf reveal the following facts:

1. BKK Corporation currently operates their landfill pursuant to Unclassified Use Permit No. 71, Revision 5 (Amendment), as approved by City Council Resolution No. 5245.
2. The City and BKK Corporation stipulated to a judgment in Superior Court on or about January 17, 1986, regarding the closure date of the BKK Landfill and entered into a separate Agreement. The judgment includes a provision directing BKK's unclassified use permit to be revised to reflect the September 15, 1986 closure date (Cessation Date) and limitations on further operations at the BKK Landfill.
3. The approval of this revision to the current unclassified use permit will result in establishing the closure date and inclusion of mitigation measures for landfill operations and closure activities. Beyond these changes, all other provisions of the unclassified use permit are to remain unchanged.

4. Findings necessary for approval of a revision to a conditional use permit are as follows:

- a) That the proposed use at the particular location is necessary or desirable to provide a service or facility which will contribute to the general well being of the neighborhood or community.
- b) That such use will not, under the circumstances of the particular case, be detrimental to the health, safety, peace or general welfare of persons residing or working in the vicinity or injurious to property or improvements in the vicinity.
- c) That the site for the proposed use is adequate in size and is so shaped as to accommodate said use, as well as all yards, spaces, walls, fences, parking, loading, landscaping, and any other features necessary to adjust such use with the land and uses in the neighborhood and make it compatible thereto.
- d) That the site abuts streets and highways adequate in width and improvements to carry traffic generations typical of the proposed uses and the street patterns of such a nature exist as to guarantee that such generation will not be channeled through residential areas on local residential streets.
- e) That the granting of such conditional use permit will not adversely affect the General Plan of the City, or any other adopted plan of the City.

5. The project is a categorical exemption, Class 1 (Section 15301 - Existing Facilities) pursuant to the requirements of the California Environmental Quality Act of 1970 (CEQA), as the project consists only of minor alterations to the operations of an existing, permitted landfill. As such, no environmental impact report or negative declaration of environmental impact are required.

NOW, THEREFORE, the Planning Commission of the City of West Covina does resolve as follows:

1. On the basis of the evidence presented, both oral and documentary, the Planning Commission makes the following findings for approval of Unclassified Use Permit No. 71, Revision 7:
 - a) The revision to the unclassified use permit is necessary and desirable in that it will provide for the establishment of the closure date within the unclassified use permit and references the activities and mitigation measures to be undertaken for the ultimate closure of the landfill. The proper and timely closure of the BKK Landfill will contribute to the general well being of the surrounding neighborhoods and community as a whole by reducing traffic congestion on Azusa Avenue, minimizing noise impacts on the surrounding community by truck traffic and landfill operations, improve the aesthetics of the landfill by providing for the development and implement final landscape plans, and installation of monitoring equipment to insure the safety of the site.
 - b) The revision to the unclassified use permit will not be detrimental to persons, or property in the vicinity to the BKK Landfill but will benefit

the community through the timely and proper closure of the landfill. The revision to the unclassified use permit will allow the closure date, as agreed to in the stipulated judgment, to be reflected in the unclassified use permit along with the limitations on further operations at the landfill, as specified in the Agreement. The closure of the landfill to the receipt of waste will benefit the persons residing and/or working in the vicinity of the landfill by reducing traffic congestion on Azusa Avenue, minimizing noise impacts on the surrounding community by truck traffic and landfill operations, improve views of the site by allowing for the development and implementation of final landscape plans, and installation of water and landfill gas monitoring equipment to insure the safety of the site.

c) The subject site covers an area of a total of 583 acres which are permitted by an unclassified use permit for landfill activities. The revision to the unclassified use permit provides for the closure date, as agreed to in the stipulated judgment, to be reflected in the unclassified use permit. In addition, the revision incorporates the Agreement which includes numerous limitations on operations and mitigation measures to assure compatibility with surrounding uses and properties. Among the provisions in the Agreement that are referenced in the revision is the limitation on areas to be graded on the site; requirements for the installation of landscaping of the Class III landfill, landscaping along Azusa Avenue, landscape screening along the southerly and southeasterly areas of the landfill, and screening landscaping along the west side of the Administration Building and Operations Area; and installation of drainage facilities, temporary and permanent, as are reasonably necessary to meet generally accepted engineering standards.

d) The subject site abuts Azusa Avenue, a primary arterial street, which provides access to both local and regional users of the landfill. Azusa Avenue is listed as a Route of Regional Significance on the Los Angeles County Congestion Management Plan (CMP) and has a service level in excess of 40,000 average daily trips (ADT) in the vicinity of the landfill. The CMP also identifies the intersection of Azusa Avenue and Amar Road as a monitoring point. Currently, this intersection is the busiest intersection in the community and one of the busiest in Los Angeles County. Currently in excess of 75,000 vehicles pass through this intersection each day. Much of the traffic on Azusa Avenue and the traffic utilizing the intersection of Azusa Avenue and Amar Road is truck traffic associated with the disposal activity at the BKK Landfill. The revision will result in incorporating the cessation date for receipt and disposal of waste at the site. As such, upon closure of the landfill, this will result in a reduction in the number of vehicle trips on Azusa Avenue and at the intersection of Azusa Avenue and Amar Road, thereby providing a beneficial impact on the roadway system and to the citizens of the community.

e) The landfill currently produces noise, odor, dust and other impacts on surrounding properties as well as residents and persons working in the vicinity of the landfill. The revision to the unclassified use permit will beneficially affect the General Plan by leading to the cessation of landfill activities which will produce a more compatible environment for residents living in the vicinity of the landfill and persons working in the vicinity of the landfill. The

closure date in the stipulated judgment and provisions of the Agreement begin the process for the transition of the landfill from active waste disposal activity to other urban compatible uses, such as recreational uses that will provide expanded recreational opportunities for residents and commercial and light industrial and/or warehousing uses that will produce employment opportunities and generate tax revenues that will benefit the community by supporting the provision of public services.

2. That pursuant to all of the evidence presented, both oral and documentary, and further based on the findings above, Unclassified Use Permit No. 71, Revision 7 is hereby approved and adopted as set forth in Exhibit A and revises Unclassified Use Permit No. 71, Revision 5 (Amendment), as adopted by City Council Resolution No 5245.

3. The revision to the unclassified use permit shall not be effective for any purpose until the owner(s) of the property involved (or a duly authorized representative) has filed at the office of the Planning Director an affidavit stating that they are aware of, and accepts, all conditions of this unclassified use permit as set forth.

FINALLY RESOLVED, that the Secretary is instructed to forward a copy of this Resolution to the permittee, City Engineer and City Council, respectively, for their attention.

I, HEREBY CERTIFY, that the foregoing Resolution was adopted by the Planning Commission of the City of West Covina, California, at a regular meeting held on the 12th day of March, 1998, by the following votes:

AYES: Commissioners Connolly, Melendez, Zeller, and Vice Chairman Reiner
NOES: None
ABSENT: Chairman Solinger
DATE: March 12, 1998


Steve Reiner, Vice Chairman
Planning Commission

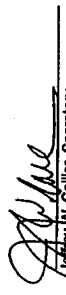

Jeffrey W. Collier, Secretary
Planning Commission

EXHIBIT A

UNCLASSIFIED USE PERMIT NO. 71, REVISION 7

Notwithstanding any other provision of this UUP to the contrary, the project shall be in conformance with the Stipulated Judgment dated January 17, 1996, between BKK and the City (the "Stipulated Judgment"), and the Agreement between BKK and the City of the same date (the "Agreement"), copies of which are attached and incorporated as Exhibits 1 and 2, respectively, as if fully set forth here.

The conditions of the UUP therefore are modified as follows:

1. Condition 1 of the UUP, "Applicant and Location," shall be revised to add the following statement:

Notwithstanding any provision herein to the contrary, BKK shall permanently cease accepting any waste for handling, transfer, recycling, disposal, landfilling or other related activities no later than 6:00 p.m., September 15, 1996. The provisions of this UUP relative to the receipt of such waste and related activities therefor shall terminate on said September 15, 1996 date or at such earlier time as BKK has given notice to the City of its intention to permanently stop accepting waste for handling, landfilling, transfer, recycling or disposal.

2. To the extent the UUP and language of the Agreement are inconsistent, the language of the Agreement shall control.

3. Nothing in these amendments shall supersede the requirements of the LEA or excuse or release BKK from compliance with approved closure and post closure plans for the site or other agencies' requirements.

4. To the extent not specifically included here, all other provisions of the UUP shall remain the same.

EXHIBIT 1

RUTAN & TUCKER
LEONARD A. HAMPPEL (State Bar No. 35964)
LAYNE H. MELZER (State Bar No. 132292)
ELIZABETH L. HANNA (State Bar No. 100856)
611 Anton Boulevard, Suite 1400
Costa Mesa, California 92626-1998
Telephone: (714) 641-5100

Attorneys for Plaintiff and Cross-Defendant
CITY OF WEST COVINA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CASE NOS. KC 013713
EC 083729

STIPULATION FOR JUDGMENT

DATE: January 16, 1996
TIME: 9:00 A.M.
DEPT: 312

CITY OF WEST COVINA,
Plaintiff,

vs.

BKK CORPORATION and DOES 1 through
100, inclusive,
Defendants.

BKK CORPORATION, a California
corporation,
Plaintiff,

vs.

CITY OF WEST COVINA, a municipal
corporation, and DOES 1 through 10,
inclusive,
Defendants.

IT IS HEREBY STIPULATED by and between Plaintiff City of West Covina and
Defendant BKK Corporation, by and between their respective attorneys, that judgment shall


///
///

1 be made and entered herein as provided in the attached Judgment marked as Exhibit "A."

2
3 DATE: January 17, 1996

RUTAN & TUCKER

4 LEONARD A. HAMPEL
5 LAYNE H. MELZER

6 By: 
7 LEONARD A. HAMPEL
8 Attorney for Plaintiff and Cross-
Defendant CITY OF WEST COVINA

9 DATE: January 17, 1996

MACKLIN TATRO

10
11 By: 
12 MERYL MACKLIN
13 Attorney for Defendant/Cross-
14 Complainant BKK CORPORATION
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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CASE NO. KC 013713
CONSOLIDATED WITH CASE NO.
BC 083729, in the Complaint in Case
No. BC 083729 deemed by Court Order a
Cross-Complaint

JUDGMENT

TRIAL DATE: January 16, 1996
TIME: 9:00 A.M.
DEPT: 312

CITY OF WEST COVINA,
Plaintiff,
vs.
BEK CORPORATION and DOES 1 through
100, inclusive,
Defendants.
BEK CORPORATION, a California
corporation,
Plaintiff,
vs.
CITY OF WEST COVINA, a municipal
corporation, and DOES 1 through 10,
inclusive,
Defendants.

WHEREAS, this cause came on regularly for trial on January 16, 1996 at 9:00 A.M. in
Department 312 of that branch of the above-captioned Court commonly referred to as Central
Civil West, located at 600 Commonwealth Street, Los Angeles, California, Leonard A.
Hempel and Layne H. Meltzer of Ruan & Tucker appeared as attorneys for Plaintiff and

Exhibit A

1 Cross-Defendant City of West Covina ("City"). Rene Tatro and Meryl Macklin of Macklin
2 Tatro appeared as attorneys for Defendant and Cross-Complainant BKK Corporation ("BKK").

3 WHEREAS, BKK is the owner and operator of a waste disposal facility known as the BKK
4 landfill located within the City of West Covina and generally on the east side of Azusa
5 Avenue, approximately 2,000 feet north of Amar Road on approximately 583 acres of land.

6 WHEREAS, the City exercises general land use regulatory authority over the landfill and in
7 or around 1962 originally permitted the operation of the BKK landfill pursuant to Unclassified
8 Use Permit No. 71 which has since been revised and amended, but remains the operative
9 landfill permit.

10 WHEREAS, on or about November 22, 1985, BKK and the City entered into a writing
11 denominated a Memorandum of Understanding ("MOU"). The parties dispute the import and
12 effect of this MOU. The City contends BKK agreed to cease landfill operations pursuant to
13 the MOU by no later than November 22, 1993. BKK, on the other hand, disputes this
14 characterization of the MOU and has to date continued to operate the BKK landfill. In order
15 to resolve this and other MOU related disputes, the parties initiated the instant judicial action.

16 WHEREAS, on June 21, 1993, the City filed its complaint against BKK in the Eastern
17 District (Case No. KC 013713) seeking among other things specific performance of the MOU.
18 On June 24, 1993, BKK filed a separate complaint in the Central District (Case No. BC
19 083729) which among other things challenged the City's attempts to enforce the MOU. These
20 cases were subsequently consolidated in the Eastern District with the City's complaint serving
21 as the lead case, and BKK's complaint designated as a cross-complaint.

22 WHEREAS, on or about July 26, 1993, BKK filed an answer to the City's complaint. On
23 January 18, 1994, the City filed an answer to BKK's First Amended Cross-Complaint. Then
24 on or about January 19, 1993, BKK filed a Second Amended Cross-Complaint and on
25 February 2, 1995 the City filed its answer to this Second Amended Cross-Complaint.

26
27
28 Exhibit A

F23U001152-C07017035.1 #10096

1 WHEREAS, the contentions of the parties with respect to this dispute are reflected in their
2 respective pleadings. Both parties deny the material allegations of each other's pleadings and
3 disclaim any liability accordingly. Nevertheless, BKK and the City have mutually determined
4 to resolve this litigation in accordance with the provisions of this judgment. Consequently,
5 BKK and the City have stipulated to the terms of this judgment.

6 **IT IS HEREBY ORDERED, ADJUDICATED AND DECREED** that BKK shall
7 permanently cease accepting any waste for handling, transfer, recycling, disposal, landfilling,
8 or any other related activities at the BKK landfill by no later than September 15, 1996 (the
9 "Cessation Date"). For purposes of this judgment BKK shall refer to the BKK
10 Corporation, including any and all affiliated persons and entities involved in any fashion in the
11 operation or ownership of the BKK landfill, including but not limited to any individual or
12 entity succeeding to the right to operate or own the BKK landfill, either by merger,
13 acquisition, purchase of the landfill property or other means of succession. The BKK landfill
14 shall refer to the entirety of the 583 acres owned by BKK within the City of West Covina,
15 including but not limited to those portions of the property devoted to landfill uses, such as the
16 currently operating Class III disposal cell and the closed Class I disposal cell, as well as any
17 future operating disposal cell within the 583 acre site. The BKK landfill Unclassified Use
18 Permit shall likewise be revised and/or amended to reflect the Cessation Date and the
19 limitations on further operations at the BKK landfill reflected herein. The City shall initiate
20 and conduct those proceedings necessary to so revise or amend the Unclassified Use Permit.
21 Nothing herein will be interpreted to preclude BKK from 1) processing landfill gas or leachate
22 connected with past or present operations of the landfill; 2) utilizing reclaimed or recycled
23 water; 3) receiving without charge from off-site sources non-contaminated soil suitable for,
24 and for the purpose of, final cover; or 4) moving any waste already on site as of the Cessation
25 Date as necessary for final closure of the landfill.

26 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that BKK shall take nothing
27 by way of its cross-complaint.

28 Exhibit A

1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that this judgment affects the
2 use and enjoyment of the landfill and adjacent private and public property. As such, this
3 judgment is intended to and does run with the real property which comprises the BKK landfill.
4 Consequently, this judgment shall be binding upon the successors and assigns of BKK. This
5 judgment, and/or any other appropriate document reflecting the terms of this judgment, may
6 be recorded by the City against the BKK landfill property.

7 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all parties shall bear
8 their own costs and attorneys' fees.

9 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that findings of fact,
10 conclusions of law, statements of decision, notice of entry of judgment and right of appeal are
11 waived. BKK further waives any right to modify, rescind or set aside this judgment for any
12 reason whatsoever.

13
14 DATE: _____

HONORABLE WILLIAM DRAKE
JUDGE OF THE SUPERIOR COURT

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P202006115-000117705.1_e04096

Exhibit A

AGREEMENT
EXHIBIT 2

This agreement is to memorialize the understanding reached by BKK Corporation ("BKK") and the City of West Covina ("City") (collectively the "Parties") regarding settlement of the dispute involving grading activities on the landfill site which BKK on the one hand contends it has the right to conduct, and which the City, on the other hand contends BKK does not have the right to conduct. In part, by letter agreement executed February 23, 1993, the parties had placed on hold resolution of the disputes addressed by that letter agreement and the matters addressed herein.

The parties have now determined to resolve some of their outstanding disputes concerning the matters addressed herein according to the following terms and conditions:

1. BKK shall conduct mitigation activities as described in attachments "A" and "B" attached hereto and by this reference incorporated herein.
2. City agrees to allow BKK to conduct the mitigation activities including grading to complete disposal operations and to facilitate closure of the landfill site described in attachments "A" and "B" attached hereto.
3. City agrees the mitigation activities described in attachments "A" and "B" hereto are not subject to the terms of CEQA or the UIIP, including environmental review under CEQA.
4. BKK agrees that its final closure plan will be subject to environmental review under CEQA.
5. BKK agrees that any grading of the Northwest Ridge line, as shown on attachments "A" and "B" shall be in conjunction with the filling of the North Steep area and subsequent development of the site for recreational or other permitted purposes, and shall be subject to review and approval by the City, after environmental review under CEQA. BKK agrees to maintain the existing outward facing slopes of the North Ridge line area, by not altering, grading or removing soil from the existing natural outward facing slopes.
6. This agreement amends by superseding, the aforementioned February 23, 1993, letter agreement.

7. In addition to any appropriate remedies at law or in equity, it is specifically agreed that this agreement shall be enforceable by specific performance and/or injunctive relief.

8. Should either party bring any action to interpret or enforce the terms of this agreement, the prevailing party in any such action shall be entitled to an award of all costs, including reasonable attorney's fees.

9. BKK agrees to indemnify and hold harmless the City from any costs or attorney's fees incurred in defending this agreement or any activities related thereto from any third-party actions. The parties shall mutually agree on selection of legal counsel for this purpose.

10. While the parties believe this agreement is enforceable and will not challenge its legal validity, the enforceability or non-enforceability of this agreement shall in no way affect the validity of the judgment being entered relating to BKK ceasing acceptance of waste.

11. This agreement has been jointly drafted by the parties and shall not be interpreted against either party based upon the drafting of the agreement.

12. BKK shall allow the City to conduct onsite inspections at any reasonable intervals deemed necessary by the City Manager or designee in order to ensure BKK's compliance with this agreement.

Acceptance of the terms and conditions of this agreement is indicated by signature of the parties below.

City of West Covina

Date: January 17, 1996
By: James E. Starbird
James E. Starbird

BKK Corporation

Date: January 17, 1996
By: Ron DeGastelum
Ron DeGastelum

2

MITIGATION MEASURES

1. LANDSCAPING OF CLASS III PORTION OF THE LANDFILL

BKK shall landscape the Class III portion of the Landfill according to the following criteria. The landscaping will incorporate a variety of trees, shrubs and ground cover materials that are appropriate for the design of the landfill cover and that will provide an attractive, dense appearance. Landscaping as defined in this agreement shall proceed on each phase of the final cover soil placement. Soil preparation, irrigation and/or plant installation shall commence within 45 days of completion of placing soil for each phase of final cover. Final installation of irrigation and landscaping shall be completed within 90 days of commencing installation. 75% of the trees shall be 5 gallon size; 25% of the trees shall be 15 gallon size or larger. Shrubs shall be 1 gallon size. Final details of the landscaping plan will be submitted to the City by April 1, 1996, for approval, conditional approval, or denial. Said plan shall not be inconsistent with the requirements of State regulatory agencies.

2. LANDSCAPING OF SOUTHERLY AND SOUTHEASTERLY AREAS OF

THE LANDFILL SITE.

BKK shall plant trees along the southerly and southeasterly perimeters of the Landfill property in conformance with a plan to be submitted and reviewed by the City (the "screening plan"). The City shall approve, deny or conditionally approve the screening plan. The type and size of trees to be planted shall be appropriate to provide a future dense screen for residents within 500 to 600 feet of the Landfill property line.

Attachment A

BKK shall submit the screening plan to the City within six months of the date of this Agreement. BKK shall commence implementation of the screening plan within 60 days of the City's approval of the plan.

3. DUST CONTROL.

BKK shall mitigate any potential dust emissions from graded pads in conformance with existing "fugitive" dust control regulations and with a plan to be submitted and reviewed by the City (the "dust plan"), which may consist, by way of example, of the hydro-seeding of rye grass. The City shall approve, deny or conditionally approve the dust plan. Said plan shall be submitted for review and approval by the City Engineer and Planning Director within 60 days of the date of this Agreement. BKK shall commence implementation of the dust plan within 60 days of the City's approval of the plan.

4. SCREENING OF OPERATIONS AREA AND ADMINISTRATION BUILDING

BKK shall plant trees and shrubs to provide a dense visual screen of the administration building and operations area from views to the west of the Landfill property in conformance with a plan to be submitted and reviewed by the City (the "administration building plan"). The City shall approve, deny or conditionally approve the administration building plan. Said plan shall be submitted for review and approval by the City within six months of the date of this Agreement. BKK shall commence implementation of the administration building plan within 60 days of the City's approval of the plan.

5. DRAINAGE

BKK shall provide a site drainage plan for review and approval prior to the commencement of each phase of the conceptual grading plan. The objective of the grading plan for drainage purposes will be to construct drainage facilities, temporary or permanent, as are reasonably necessary to maintain existing drainage capabilities onsite and at the storm drain inlet in Azusa Avenue adjacent to the landfill site so long as all drainage facilities meet generally accepted engineering standards.

6. AZUSA AVENUE SCREENING AND LANDSCAPE PLAN

BKK shall submit a screening and landscape plan for the Azusa Avenue frontage in the event excavation occurs within Area 2 below the elevation shown on the Conceptual Grading Plan. Said plan shall be submitted to the City in conjunction with the rough grading plan. The plan shall incorporate an irrigation system and dense shrub, fencing vines and tree plantings to produce an effective screening of Area 2. The City shall approve, deny or conditionally approve the screening and landscape plan prior to or in conjunction with the rough grading plan.

GRADING

BKK has the right to grade the areas described on the attached Conceptual Grading Plan, in the following phases. Phase I shall consist of grading in Areas 1 and 2 for daily cover within the Class III Landfill or for placement within Areas A and B for the purposes of final cover or a vegetative layer. Phase II shall consist of grading in Areas 1 and 2 for daily cover within the Class III Landfill or for placement in Area C for the purposes of final cover or a vegetative layer. Phase III shall consist of grading in Areas 1 and 2 for daily cover within the Class III Landfill or placement in Area D for the purposes of final cover or a vegetative layer. Phase IV shall consist of grading in Areas 1 and 2 for daily cover within the Class III Landfill or for placement in Area E for the purposes of final cover or a vegetative layer. Phase V of the grading will be in the Northwest Ridgeline area of the Landfill and will be subject to the limitations expressed in paragraph 5 of the attached Agreement. The above-described phases may proceed concurrently if, in the sole business judgment of BKK and after notification to the City Planning Department, the efficient operation of the Landfill and final grading so requires.

The final cover/vegetative layer shall consist of a seven and one-half (7.5) foot deep vegetative soil layer, a one foot deep barrier layer and a two foot deep foundation layer.

Prior to grading of any ridgeline or outward facing slopes within Areas 1 or 2, BKK shall submit detailed soil quantity calculations for phases I through IV to demonstrate that adequate soil exists for daily cover and final cover/vegetative layer and a rough grading plan for phases I through IV showing final pad elevations and design for

Attachment B

slopes. BKK shall also submit a specific description of the sequence of grading and placement of daily cover and final cover/vegetative layer. Irrespective of the availability of onsite soil, BKK shall satisfy the requirements of the rough grading plan without extension of grading activities into the Northwest and North Ridgeline areas.

City shall monitor said grading plan to insure compliance by BKK in an expeditious manner and in conformance with applicable City regulations. The City shall approve, deny or conditionally approve the rough grading plan/soil quantity calculations. In the event BKK requires additional soil for final cover/vegetative cover, BKK may excavate Area 2 below the elevations shown on the Conceptual Grading Plan subject to showing said excavation on the rough grading plan and providing a screening and landscape plan for the Azusa Avenue frontage as provided for in Attachment A.

Grading of the Western Ridgeline in Area 2 shall not extend further north than the top of slope shown on the attached Conceptual Grading Plan. The transition slope to be graded between said top of slope and the new pad at this location shall be contour graded at a slope not steeper than two horizontal feet to one vertical foot.



P.O. Box 682, Walnut, CA 91788-0682
 21201 LA PUENTE ROAD
 WALNUT, CALIFORNIA 91789-2018
 Telephone (909) 595-7543
 FAX (909) 595-6095

CITY OF WALNUT

October 17, 1996

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

Dear Mr. Stone:

Subject: Comments on the Preliminary Draft of the Los Angeles County Countywide Siting Element; Draft Summary Plan of the Countywide Integrated Waste Management Plan; and related Environmental Documents.

Upon my review it appears that the Siting Element and Summary Plan includes sites, which unless deleted or modified, may cause some cities to not support the approval of the Element. If not approved, the Siting Element may have economic consequences on the County and the cities within the County.

The Summary Plan is simply a compilation of the cities' plans from throughout the County and does not take an "integrated" approach to management of waste in the County from waste production to disposal. The Summary Plan does not provide a blueprint on how disparate programs can be coordinated to maximize the impact of scarce financial resources.

It is recognized that the County alone cannot achieve the needed Integrated Waste Management Plan. The Los Angeles County Waste Management Task Force does not have the authority or the means to create an Integrated Waste Management Plan. The County and all cities in the County are the only means for creating an Integrated Waste Management Plan.

Steps must be taken to insure that the cities in the County achieve the required waste diversion, manage their waste, and control costs to the public. This would include not only an Integrated Waste Management Plan, but also a Facility siting Plan which include materials recovery facilities and regional composting sites that the County and all cities can support.

Sincerely,

Jack W. Yoshino
 Senior Management Assistant

ptw:10/96

A
 8/24/96
 JUNE WENTWORTH
 Mayor
 WILLIAM T. CHOCTAW, M.D.
 Mayor Pro Tem
 "BERT" ASHLEY
 JOAQUIN LIM
 ROBERT PACHECO
 Council Members
 SA

RECEIVED
 OCT 28 1996
 DEPARTMENT OF PUBLIC WORKS
 ENVIRONMENTAL PROGRAMS

C22.1 Please refer to Topical Response #1.

C22.2 Please refer to Topical Response #1.

CITY OF Glendale CALIFORNIA

633 East Broadway, Room 209, Glendale, CA 91206-4385
October 17, 1996

Director of
PUBLIC WORKS

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

NOV 12 1996
DEPARTMENT OF PUBLIC
ENVIRONMENTAL PROGRAMS

Dear Department of Public Works:

On June 12, 1996, the attached comments were sent on the Preliminary Draft Summary Plan of the Los Angeles County Countywide Integrated Waste Management Plan and the Countywide Siting Element. The letter supported a time extension in the comment period "in order to allow more time for detailed discussions with the 88 local cities on how consolidated or coordinated Countywide programs can assist local jurisdictions in meeting the goals of AB 939." I regret to say that those discussions have not taken place. While the following comments can be provided on both the Summary Plan and the Siting Element, a more thorough discussion among local jurisdictions is still needed to consider how we will reach our mutual goals.

Comments on Draft Summary Plan - Consistent with State requirements, the Summary Plan on page 1-2 states that: "The purpose of the Summary Plan is to establish countywide goals and objectives for integrated waste management... and describe programs that could be consolidated or coordinated countywide, and how these countywide programs are to be financed." In terms of financing, an \$0.86/ton County Solid Waste Management Fee is currently charged on all refuse disposed in the County. It is my understanding that a majority of that fee is currently used for countywide household hazardous waste programs. The only other existing countywide programs mentioned in the Summary Plan are backyard composting and school educational efforts.

The 89 Los Angeles County jurisdictions face a very difficult task in meeting the 50 percent waste diversion mandate. The task is made more difficult by relatively low refuse disposal costs that provide little economic incentive to recycle. In addition, the availability of numerous public and private landfills makes it very difficult for local jurisdictions to track their waste, as is reflected in the great discrepancy between city and county disposal totals for the base year.

In response to those needs, the Summary Plan presents some laudable goals but the suggested objectives and "future coordinated programs" do not, as a whole, address the magnitude of the task before us. Would it not be preferable for the County to convene a permanent Technical Advisory Committee (TAC) to the Task Force where city staff representatives can present their waste diversion needs and suggested ways for the County to address those needs. Each of the subregional groups should have



at least one member on the TAC, although meetings should be open to encourage participation. A corresponding additional Summary Plan goal could be: "In response to the expressed needs of local jurisdictions, implement a countywide waste diversion strategy."

One component of the strategy will certainly be how to address the diversion of the large amount of construction and demolition waste that is disposed by hundreds of commercial and self-haulers at all local landfills. While a high percentage of this waste was diverted immediately after the Northridge earthquake, the diversion rate has recently declined due to the inability of recycling facilities to compete with low landfill costs. It will be difficult for any one jurisdiction to control this waste stream since there are hundreds of permitted and unpermitted construction and demolition debris haulers and self-haulers active in the county. The fact that disposal at some permitted inert waste sites is considered disposal while disposal at other "unpermitted" sites is not counted should also be addressed.

Given the necessity for green waste diversion to meet the 50% goal, another strategy could be to improve the markets for separated yard trimmings and to implement an extensive multi-media countywide education effort to promote such cost-effective waste reduction practices as grasscycling (encouraged on page 5-45). In the San Francisco Bay Area, a regional waste reduction effort was recently conducted under the sponsorship of counties, cities, state agencies, and various grocery stores. The "Shop Smart" campaign featured in-store displays and multi-media promotions with the goal of heightening consumer awareness of shopping options that would prevent waste and save resources.

One way to fund such efforts would be to redirect a portion of the County Solid Waste Management Fee to fund countywide efforts that are supported by and are beyond the resources of the cities. The TAC should be used to solicit input from cities on the current use of this countywide fee.

Over one-third of local jurisdictions in the Los Angeles region requested revisions to their base year waste generation and reporting year disposal data in their first Annual SRRE Reports. This was the highest percentage of requested revisions in California. The need for base year revisions is indicated by the 16% increase in countywide waste disposal from 1990-1995 reported in Table 4-2. The Summary Plan should indicate that the TAC will be used to cooperatively address problems in both areas.

In a separate matter, the list in Table 3-7 of informal regional groups that address integrated waste management issues should be expanded to include the Scholl Canyon Wasteshed Committee, which is composed of the Cities of Glendale, La Canada Flintridge, Pasadena, San Marino, Sierra Madre, and South Pasadena, Los Angeles County, and the Los Angeles County Sanitation Districts. This group is the oldest such regional group, having been meeting since 1989.

Our other comments on the Summary Plan are corrections to the Glendale portion of Tables 4-1, 4-2, and 5-19, Appendix 4-A, and Appendix 4-D.. In Table 4-1, Glendale should be listed as using government and permits for residential and commercial service, with 67 total haulers. Some of our haulers use the Central LA, Community Recycling, Waste Transfer, Western Waste, and South Gate transfer

stations. While we understand Table 4-2 is to be updated, it was clearly a mistake to list Glendale's 1995 waste disposal as 60,466.94 tons (it was evidently switched with Gardena's 233,718.61 ton total). In Table 5-19, an "E" should be listed next to Glendale for the Community Recycling and Resource Recovery Facility, which was included in our NDFE.


In Appendix 4-A, line 8 should include a check for "permits/license." Line 13 should include a check for "government." Line 14 should list 67. Line 16 should include the transfer stations listed above. Line 17 should include the landfills listed in Table 4-1. Line 18 should show that all collected waste went to landfills. Line 21 should include checks for "contracts" and "government services." Line 23 should state "No." Line 25 should read 25,547. For "Recycling Implementation Programs," code 1 should state 4,670 TPY, code 3 should state "Yes" and 2,410 TPY, code 5 should state 193 TPY, code 6 should state 683 TPY and "No" for planned program, code 18 should state "Yes" for planned program, code 25 should state "Yes" for existing program, code 27 should list 748 TPY, code 33 should list 13,695 TPY, code 40 should state "Yes" for planned program, code 47 should state "Yes" for existing program, code 48 should state "Yes" for existing program, code 49 should list 12,945 TPY and code 50 should list 14,853 TPY. The Appendix 4-D table for Glendale should reflect the same tonnages noted above.

Comments on Draft Countywide Siting Element - The page 3-36 Brand Park Landfill Fact Sheet should be revised as follows: remaining permitted capacity: 937,500 tons or 750,000 cubic yards, in-place density: 1.25 tons/cubic yard, permitted daily capacity: 82 tons or 65 cubic yards, permitted monthly capacity: 1,300 tons or 1,040 cubic yard, permitted yearly equivalent: 15,600 tons or 12,480 cubic yards, 1995 average daily waste quantity: 22 tons at 5 days/week or 17.6 cubic yards/day at 5 days/week, permitted waste types: inert waste, fragmented asphaltic cement, concrete, dirt. Under point 3, the text should read "the Landfill was disposing of 60 cubic yards per day, and 1,300 tons per month."

Table 4-1 should include a listing of the waste received at all unclassified landfills and a separate table should be added to address the current status of all unclassified landfills. Since three unclassified landfills are permitted and therefore compete with the unpermitted unclassified landfills, it is difficult to determine how to reduce reliance upon the permitted sites without information on the unpermitted sites. This would seem one of the easiest ways to reduce the amount of waste disposed in permitted landfills.

If you have any questions concerning these comments, please contact Tom Brady in the Integrated Waste Management Section at 818-548-3916.

Sincerely,


Kerry Morford
Director of Public Works

c.c. Robert Weger
KM:TB:tb

C23.1

C23.1 Comment noted.

C23.2

C23.2 Comment noted.

EPD



City Council
of the
City of Los Angeles
City Hall

ROOM 237
200 N. SPRING ST.
LOS ANGELES 90012-4876
(213) 485-3343

DISTRICT OFFICE
18917 NORBROOK ST., STE. 10
NORTHridge 91324-3789
(818) 999-8501
(818) 996-5210

HAL BERNSON
COUNCILMAN
TWELFTH DISTRICT

March 29, 1996

RECEIVED
APR 03 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Mr. Mike Molajer
L. A. County Department of Public Works, Waste Management Division
900 South Fremont Avenue
Alhambra, California

Dear Sir:

I have read with great concern the Preliminary Draft of the Los Angeles County Countywide Siting Element which was recently circulated by your Department. The State's recycling law, AB 939 which was adopted in 1988, directed local jurisdictions to reduce their waste streams by 25% by 1995 and 50% by the year 2000. Many municipalities, including the City of Los Angeles, are committed to implementing aggressive waste reduction recycling programs beyond the State-mandated goals.

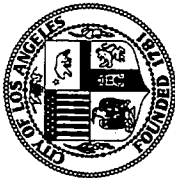
As I read the draft Siting Element, I am dismayed that its focus is to designate sites for landfills in populated metropolitan areas. The spirit of AB 939 was to reduce local reliance on landfills for waste disposal and to encourage alternative disposal efforts. The thrust of the draft Siting Element does not conform to this spirit but is more akin to the "garbage to landfill philosophy" which lead to the passage of AB 939.

You have sought public comments for the draft Siting Element. I encourage you to re-read AB 939 and to prepare a plan which does not contain as its centerpiece, the designation of landfills in major metropolitan areas as the prime means of solid waste disposal for local jurisdictions.

Very truly yours,

Hal Bemson
Councilman, 12th District

C24 C24 Please refer to Topical Response #1.



COUNCILMAN

MARVIN BRAUDE

Eleventh District

City Hall
Los Angeles, CA 90012
(213) 405-3811

Valley Office
17547 Ventura Boulevard
(818) 756-8150

West Los Angeles Office
1645 Corinth Avenue
(310) 575-8461

Mike Mohajer
Los Angeles County Department of Public Works
Waste Management Division
900 S. Fremont Avenue
Alhambra, CA 91803

April 11, 1986

Dear Mr. Mohajer:

I am writing to you in my capacity as a Los Angeles City Councilman to express to you in the strongest possible terms my objection to the inclusion of Mission and Rustic-Sullivan Canyons in the preliminary draft version of the Los Angeles Countywide Siting Element as possible sites for landfills.

I recognize that AB 939 requires Los Angeles County to prepare an inventory of currently operating landfills and sites which could be utilized for future landfills, and to submit that siting document in compliance with legal requirements. However, though the law requires that sites which could be used as future landfills be included, it does not require, nor should it encourage, the inclusion of sites which, because of decisions already made by various levels of government, could not be developed as landfills.

With respect to the designation of Mission and Rustic-Sullivan Canyons as possible future landfill sites, I call your attention to two separate votes taken by the Los Angeles City Council, in 1977 and in 1980, votes whose outcomes continue to stand as official City policy. In each of those years, the City Council refused to issue a conditional use permit to the Los Angeles County Sanitation Districts for the reopening of Mission Canyon as a landfill. Because of this clear expression of the Council's intention that no more landfilling occur in Mission Canyon, that canyon today does not operate as a landfill, and will never be a landfill, because the permits required for it to function as one have not been issued and will not be issued.

Subsequent to those votes, the City Council has also directed that the Brentwood-Pacific Palisades Community Plan, which includes both Mission and Rustic-Sullivan Canyons, be amended by the removal of the symbol which had previously designated both sites as potential landfills and replacing that designation with one of future golf or public recreational uses. Thus any consideration of these canyons as potential landfills would be unlawful because it would violate the applicable community plan, and would

C25.1 Please refer to Topical Response #6.

be clearly inconsistent with the City of Los Angeles' expressed intention that Mission and Rustic-Sullivan Canyons' future uses be recreational in nature and character.

I am deeply concerned that facts as widely known as these were ignored by the County in its preparation of this draft Siting Element, and that residents of the Eleventh District have been needlessly subjected to alarm by the references to Mission and Rustic-Sullivan Canyons in this draft document.

Excluding these canyons from the draft Siting Element on the grounds that for legal reasons they cannot be developed as landfills would in no way violate the requirements of AB 939, but it would put to rest an unnecessary furor that has been raised in the community. I urge in the strongest possible terms that, for the reasons I have outlined, Mission and Rustic-Sullivan Canyons be deleted from the preliminary draft of the Countywide Siting Element and Summary Plan of the Countywide Integrated Waste Management Plan.

Very truly yours,



C25.2

C25.2 These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6.

**SANTA CLARITA MAYOR CARL BOYER'S REMARKS
ON THE PRELIMINARY DRAFT LOS ANGELES COUNTY COUNTYWIDE
SITING ELEMENT AND
ITS DRAFT ENVIRONMENTAL IMPACT REPORT,
THE PRELIMINARY DRAFT SUMMARY PLAN OF THE LOS ANGELES
COUNTY COUNTYWIDE INTEGRATED WASTE MANAGEMENT PLAN
AND ITS PROPOSED NEGATIVE DECLARATION**

**VALENCIA HIGH SCHOOL
MONDAY, APRIL 22, 1986**

Good evening. I am Carl Boyer, Mayor of the City of Santa Clarita. On behalf of the citizens of our community, I want to thank you for honoring Supervisor Antonovich's request for a second meeting to be held in the Santa Clarita Valley.

At the Santa Clarita community meeting of April 4, specific ground rules were laid out discouraging discussion of specific landfill sites. The intent of these public meetings was purported to be a broader discussion of the siting element and countywide summary plan. Several people left that meeting because they specifically wanted to address issues associated with the Elsmere

C26.1 through C26.8

The issues discussed in this speech have been addressed in the final EIR. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.

Canyon dump proposal which is an integral part of the county plan!

One week after the first Santa Clarita Valley meeting, Supervisor Zev Yaroslavsky spoke at length regarding his concerns about inclusion of Mission-Rustic-Sullivan Canyons in the draft siting element. Clearly, the rules governing discussion of specific landfills have been inconsistently applied throughout these meetings. Following on the precedent set at the April 11 meeting, I am here this evening to focus specifically on the Elsmere Canyon proposal.

In 1988, Los Angeles County undertook a study of 101 potential landfill sites throughout the county. In 1990, that list was scaled down to six sites, predominantly within close proximity of each other in the north county. Here we are, six years later and four of those six original sites are listed in the Siting Element as

C26.1

C26.1 The public information meetings conducted in accordance with State Law Title 14, Chapter 3, Guidelines for implementation of CEQA. Please refer to Section 3.1 of the Final EIR on the public review process, and Topical Response #2 for further discussion.

potential new Class III landfills. Blind Canyon, Mission-Rustic-Sullivan Canyons, Towlsey Canyon and Elsmere Canyon are as fresh in the County's mind today as they were six years ago! However, the dynamics of solid waste management have changed dramatically over the past six years to the point where I am confident that not one of these new landfills will be built!

You already know that Blind Canyon has ownership, access and cross jurisdictional issues which render it unsuitable for use as a dumping ground!

You already know, that Mission-Rustic-Sullivan Canyons have environmental and political considerations which render them unsuitable for use as a dumping ground!

You already know, that Towsley Canyon has access and environmental issues which render it unsuitable for use as a

C26.2 Comment noted. As indicated in the Draft EIR Section 2.4, Description of Project, each site must undergo a vigorous site-specific assessment and address all environmental concerns as mandated by the California Environmental Quality Act (CEQA).

C26.2 The issue of accessibility to certain potential new landfill sites was discussed I Chapter 6, Section 6.4 of the Preliminary Draft CSE (Chapter 7, Section 7.4 of the Final Draft CSE). Please refer to topical Response #6 and #8 for further discussion.

C26.3 Mission Rustic and Sullivan Canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System. Also, refer Topical Response #6 for further discussion.

C26.4 Please refer to response #C26.2.

C26.4

dumping ground!

You already know that Elsmere Canyon, as part of the Angeles National Forest, has ownership and environmental issues that are insurmountable, and render it unsuitable for use as a dumping ground! Like the other "choices", the Elsmere Canyon landfill will never be built!

There are legitimate technical considerations which prevent Elsmere Canyon from being used as a landfill. In a May 4, 1995 letter to the U.S. Forest Service, the Los Angeles County Department of Public Works Assistant Deputy Director of the Planning Division outlined a number of deficiencies in the Elsmere draft environmental document. On May 18, a second letter was sent from the Department of Public Works rescinding the original letter. Missing from the "new, officially sanctioned" comments were references to two critical issues, fault activity and

C26.5

C26.5 Please refer to Topical Response #6.

C26.6

C26.6 This comment is in reference to an issue which is beyond the scope of the CSE and its EIR.

groundwater. These two letters call into question whether or not the County Public Works staff is providing decision makers with the best technical information available or sanitized information which leads to predetermined conclusions!

Why are you continuing to advocate that new urban landfills be placed before all other solutions? It is time that County staff give the policy makers accurate information which acknowledges that Los Angeles County does not have fifteen years of in-county landfill capacity and that alternatives must be more seriously focused upon.

Our existing landfill capacity must be managed more prudently; as a scarce commodity rather than a cheap, endless disposal supply.

C26.7

C26.7

The commentor appears to have misinterpreted the purpose of the CSE. The purpose of the CSE is not to serve as a specific landfill development plan but as a policy manual. For this purpose, the CSE establishes siting criteria to be applied to any proposed new or expansion of an existing landfill or transformation facility in Los Angeles County. Also, it should be noted that State law (Section 40120.1 of the PRC) defines "disposal" as "the management of solid waste through landfill disposal or transformation at a permitted solid waste facility." As such, the 15 years of disposal capacity required by the law to be addressed by the CSE can only be met by identifying potential landfill and/or transformation capacity.

Specific sites identified in the CSE, which are listed as areas that may be potentially suitable for new or expansion of existing landfills, are included to demonstrate whether Los Angeles County can meet the 15-year disposal capacity requirement of State law. These landfill sites have been proposed for development by the project proponents indicated in the CSE, however, no new transformation facilities or expansion of existing transformation facilities have been proposed as of the time of preparation of the Final EIR.

There are a number of policy recommendations and actions which can be taken by Los Angeles County today to extend the life of existing landfills and allow time to cushion the impacts of alternative solutions. The time for action is now!

CE.MPM.lacosit.422

C26.8

The Final Draft CSE incorporates a new chapter on alternative solid waste disposal technologies and alternative methods for extending class III landfills. Please refer to Chapters 2 and 5 of the Final Draft CSE for further discussions on goals and policies of the CSE and alternative disposal technology respectively.

C26.8

8711

STATE OF CALIFORNIA—BUSINESS AND TRANSPORTATION AGENCY

PIE WILSON, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3606
TDD (213) 897-6510



March 21, 1996

IGR/CEQA RP3
DEIR
Countywide Siting Element
County of Los Angeles
SCH #95011048
VIC: LA-Various

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

Dear Mr Smith:

Thank you for including the State of California Department of Transportation in the review process for the above referenced document.

Based on our review finding, we have no comment at this time; however, we will contact you again should we identify anything that should be brought to your attention.

If you have any questions regarding this response, please call me at (213) 897-4429.

Sincerely,

Steve Buswell
IGR/CEQA Coordinator
Transportation Planning
Office

cc: State Clearinghouse

RECEIVED
MAR 28 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

GI

GI This comment is acknowledged.



KERN COUNTY WASTE MANAGEMENT DEPARTMENT

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

RECEIVED
MAR 28 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

March 26, 1996

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.

Sincerely,

DAPHNE H. WASHINGTON, Director

By: Susan L. Reid, AICP
RMDZ Coordinator

SLR:ju
E:\LETTERS\012612.R.SJD

G2 | G2 This comment is acknowledged.

A

STATE OF CALIFORNIA

CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

8800 California
Sacramento, California 95826

Pete Wilson, Governor



DS

April 2, 1996

Mr. Harry W. Stone
County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803-1331

RECEIVED

APR 10 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

Dear Mr. Stone:

Thank you for your letter dated March 6, 1996 regarding the Los Angeles County Draft Countywide Siting Element and Draft Countywide Integrated Waste Management Summary Plan and related environmental documents.

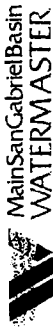
State law (Public Resources Code Section 40412) requires that California Integrated Waste Management board members disclose all communications conducted outside of a Board meeting about matters which could come before the Board. In compliance with this law, I am notifying you that your correspondence has been made a part of the Board's official record as well as the subject record to which it relates.

Sincerely,

Robert C. Frazee
Vice Chairman

G3 This comment is acknowledged.

G3



Handwritten initials and a checkmark.

April 24, 1996

RECEIVED
APR 29 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

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

Subject: Los Angeles County Countywide Siting Element and
Draft Environmental Impact Report

Dear Mr. Mohajer:

The Main San Gabriel Basin Watermaster has reviewed the subject Los Angeles County Countywide Siting Element and its Draft Environmental Impact Report. Based upon historical impacts of existing and completed landfill operations on the quality of groundwater in the Main San Gabriel Basin (Basin), Watermaster has serious concerns regarding certain portions of the Solid Waste Land Disposal and Transformation Facility Siting Criteria.

The upper water-producing zones of the Basin are unconfined and consist of highly permeable material which will transmit water and other fluids readily. The Basin, with a surface area of approximately 167 square miles, is also a major aquifer recharge area and is highly susceptible to degradation and contamination. Because of the potential degradation and contamination of a valuable and irreplaceable water supply, Watermaster has declared its policy to oppose all landfill operations other than those which use only inert materials for fill. This policy and additional requirements for inert landfills are stated in the enclosed Watermaster Resolution No. 3-88-57.

As stated in our previous comments on the Notice of Preparation and Initial Study, Watermaster is particularly concerned with the following sections of the Siting Criteria (Appendix 5-A of the Countywide Siting Element and Appendix B of the Draft EIR):

- 4. Pages 5A-10/B-10 -- Add the following: New Class III landfills may only be located within areas of potential rapid geologic change if containment structures are designed, constructed and maintained to preclude failure.
- 5. Pages 5A-18/B-18, 5A-19/B-19, 5A-21/B-21, 5A-22/B-22 -- These pages may improperly suggest that, if a liner and collection system and large number of monitoring points are installed, a Class III landfill may be placed anywhere. This is

G4.1

This comment is acknowledged.

G4.2 and G4.3

The siting criteria in Appendix 6-A (Volume III of the Final Draft CSE) has been revised in pages 6A-19, 6A-21, and 6A-22 to reflect that proposed land disposal facilities must meet Federal, State, regional and local requirements for insuring no impairment of beneficial uses of surface water or groundwater beneath or adjacent to a landfill. These requirements also include site location restrictions regarding fault areas, seismic impact zones, unstable areas, and other factors.

G4.2

G4.3


Mr. Mohajer
April 24, 1996
Page 2

contrary to the law. Public Resource Code § 40060 absolutely prohibits a new or lateral expansion of an existing Class III landfill in former sand and gravel pits in the Basin. Class III landfills should be prohibited in or over water-producing aquifers.

We appreciate the opportunity to review and to comment on the Preliminary Draft of the Los Angeles County Countywide Siting Element and its Draft Environmental Impact Report. If you have any questions or desire additional information regarding these concerns, please call me at (818) 815-1300.

Very truly yours,

MAIN SAN GABRIEL BASIN WATERMASTER



Carol Williams
Executive Officer

CW:RKS:m

Enclosure -1

cc: Watermaster members
Mark McDonald

sljlaia.com

ERD

State of California

California Environmental Protection Agency

Memorandum

To: Chris Belsky
State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

Date: April 23, 1996

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

RECEIVED
APR 29 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

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

Subject: SCH #95011048, Draft Environmental Impact Report (DEIR)
for Los Angeles County's Countywide Siting Element
(CSE)

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 CSE is a planning document which describes Los Angeles County's remaining existing solid waste disposal capacity, future disposal capacity needs, and possible expansion of the existing landfills. This document specifies that the County has a minimum of 15 years of disposal capacity available through existing, expanded, and new facilities.

The CSE sets forth siting criteria and a selection process for new landfill sites and also describes Los Angeles County's intention to transport solid waste to several out-of-county disposal facilities.

GENERAL COMMENTS

The Environmental Impact Analysis in Chapter 6 states that this DEIR does not address impacts from projects not yet defined, and that all environmental issues will be analyzed in environmental impact reports or appropriate environmental documents prepared in association with development of new disposal facilities, the expansion of existing facilities, and establishment of new programs.

Staff agree with the statement in the CSE that any proposed expansion of the existing landfills, new landfills or establishment of new programs will be subject to future environmental review. As a reminder, please be sure to send to the Board a copy of the Notice of Determination filed with the County Clerk or State Clearinghouse, documenting the County's adoption of the EIR, to ensure that your CSE submittal is complete.

Thank you for the opportunity to comment on this document. If you have questions, please contact Yasmin Satter of my staff at (916) 255-2394.

- | | |
|------|------------------------------------|
| G5.1 | G5.1 This comment is acknowledged. |
| G5.2 | G5.2 This comment is acknowledged. |

RECEIVED
DEPT. OF ENVIRONMENTAL SERVICES
1998 APR 29 AM 11:04
FATAL CO. 1000
800 S. FREMONT AVE.

April 23, 1996
Ms. Michael Mohajer
Page 2

**COMMENTS ON THE LOS ANGELES COUNTY PRELIMINARY DRAFT
SITING ELEMENT AND DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE SITING ELEMENT
(COUNTYWIDE INTEGRATED WASTE MANAGEMENT PLAN)**

PROJECT DESCRIPTION

The Los Angeles County Department of Public Works has prepared the Preliminary Draft Siting Element and Draft Environmental Impact Report for the Siting Element (Countywide Integrated Waste Management Plan).

The Siting Element describes those areas that will be used for the development of adequate transformation or disposal capacity for waste that has been first reduced through source reduction, reuse, recycling, and composting. The goals and policies outlined in the element do encourage the development of future solid waste disposal/transformation facilities and alternative waste management facilities. The Siting Element demonstrates that Los Angeles County has plans for sufficient disposal capacity for 15 years of solid waste disposal for its participating jurisdictions, when the specifically identified planned landfill expansions or new landfills are permitted and developed, provided they are environmentally sound and technically feasible. The siting element assumes that the County and local jurisdiction's waste diversion programs will be implemented. Specific policies are detailed which will help reduce the volume (tonnage) of solid waste requiring disposal/transformation through source reduction, recycling, composting and public education.

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 23, 1996
Ms. 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 Siting Element references the SCAG employment forecasts, which were used to develop waste generation and disposal projections. The Summary Element, however, uses state population and taxable sales projections, instead of SCAG projections for developing their waste generation and disposal projections.

G6.1 This comment is noted.

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 Siting Element includes as a goal to reduce the volume (tonnage) of solid waste requiring disposal/transformation through source reduction, recycling, composting and public education. It also includes goals to assist jurisdictions who wish to site solid waste/transformation facilities and alternative waste management facilities; to develop and utilize environmentally sound and technically feasible remote disposal sites and related efforts to provide access to these sites; and, to conserve Class III landfill capacity through various measures, like alternative daily cover materials. These goals and related policies are directed toward minimizing the cost of solid waste infrastructure.

G6.2 This comment is noted.

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 Siting Element 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.

G6.3 This comment is noted.

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 Siting Element.*

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 Siting Element.

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 applicable to the Siting Element.

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 Siting Element.

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 Siting Element 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 Siting Element encourages local programs which should help

G6.4

G6.4

This comment is noted.

G6.5

G6.5

This comment is noted.

reduce the overlap in waste prevention campaigns. 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 Siting Element includes as an important goal to protect the economic well-being of Los Angeles County by ensuring that the County is served by an efficient and economical public/private solid waste disposal system. The Element, however, fails to adequately address the large volume of waste (691 tons in 1995) from outside the county that may continue to be attracted to Class III landfills and transformation facilities in Los Angeles County. The disposal capacity needs projections do not appear to reflect any disposal capacity considered or reserved for out-of-county imports. Furthermore, the Element does not attempt to forecast the volume of waste that may be exported to other counties. This may represent a significant amount, given recent efforts by Orange and Riverside Counties to seek disposal of waste from Los Angeles County.

G6.6 See Topical Response #3, #5 & #9.

G6.6

In order to help meet the Siting Element's goal of providing long-term disposal of non-hazardous waste and facilitate future siting of new and expanded solid waste disposal facilities in Los Angeles County, the Element includes policies to support and facilitate environmentally sound and technologically feasible rail-haul projects outside Los Angeles County. These could include use of truck haul landfills in adjacent counties; rail haul facilities, such as the proposed Bolo Station or Mesquite regional landfills; or facilities in other states, such as the La Paz or Butterfield landfills in Arizona.

G6.7 This comment is noted.

G6.7

14.4 *Promote new technologies.*

SCAG staff comments. The Siting Element include references to new technologies, and the importance they can play in source reduction, reuse, recycling, composting, landfilling and waste transformation. In order to help meet the goal of providing assistance to jurisdictions who wish to site solid waste disposal/transformation facilities and alternative waste management facilities, the Element identifies two policies to support the development and introduction of new technologies. The Element currently includes only a limited discussion of new technologies (waste-to-energy and pyrolysis). This discussion could be expanded, utilizing information in the County Public Works Department's files or available from SCAG's Solid Waste Task Force study which is currently in process.

G6.8

G6.8

See Topical Response #14 and Chapter 5 of the Final Draft CSE.

14.5 *Facilitating regional dialogue on intercounty waste disposal projects.*

April 23, 1996
Ms. Michael Mohajer
Page 7

SCAG staff comments. The Siting Element acknowledges the existence or possible development of a number of out-of-county solid waste disposal facilities. The Element contains a thorough discussion on the limitations of the out-of-county disposal option. Also included is a thorough discussion of transportation infrastructure requirements (truck transport, rail haul and rail loading facilities). 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.

CONCLUSION

As described above, the Siting Element and its Draft Environmental Impact Report are generally consistent with pertinent policies in the Regional Comprehensive Plan and Guide.

G6.9

This comment is noted.

G6.9

G6.10

This comment is acknowledged.

G6.10



DS-A
**COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY**

1955 Workman Hill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (310) 699-7411, FAX: (310) 695-6139

CHARLES W. CARRY
Chief Engineer and General Manager

May 9, 1996
File: 31R-10.10

RECEIVED
MAY 14 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

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

Dear Mr. Wolfe:

Comments on the Preliminary Draft
Los Angeles County
Countywide Siting Element

The Sanitation Districts have reviewed the Preliminary Draft Countywide Siting Element (CSE), the Draft Environmental Impact Report for the CSE, the Summary Plan, and the Proposed Negative Declaration for the Summary Plan. The Sanitation Districts have the following comments regarding the CSE.

Chapter 4

The Preliminary Draft CSE provides a comprehensive review of both the existing disposal system and the potential disposal options available to Los Angeles County over the 15 year planning period. The Preliminary Draft CSE presents two scenarios concerning potential future available disposal capacity:

Scenario A is based on the assumption that no additional disposal capacity is permitted either through expansion of existing landfills or through the permitting of new landfills. Under this assumption, the remaining permitted capacity would be exhausted over time taking into consideration the specific conditions and restrictions of each landfill.

Scenario B is based on the assumption that all possible additional capacity is available through the permitting of all possible expansions and through the development of all proposed new landfills.

Scenario A provides a baseline for realistically determining future disposal needs by analyzing the remaining available permitted disposal capacity over time, assuming that all of the 89 jurisdiction in Los Angeles County meet the diversion goals of AB 939. The analysis in Scenario A shows that with the closure of the BKK and Lopez Canyon Landfills in 1996, over 15,000 tons per day of permitted disposal capacity will be lost, and that with the subsequent closures of the Azusa Western, Spadra, and Bradley West Landfills by 1999, Los Angeles County will be faced with a disposal capacity shortfall. The conclusion that can be drawn from the

analysis in Scenario A is that Los Angeles County continues to face a mid-term to long-term disposal capacity shortfall, notwithstanding the additional disposal capacity recently made available through the permitted expansions of the Puente Hills and Sunshine Canyon Landfills.

Scenarios A and B should be updated in the Final CSE to incorporate the most recent developments in available disposal capacity, including the "put or pay" agreements between Orange County and certain private refuse haulers from Los Angeles County as discussed in Chapter 8.

Given the high degree of uncertainty regarding the permitting of additional disposal capacity in the future, Scenario B provides an unrealistic assessment of Los Angeles County's ability to independently meet its future disposal capacity needs (including adequate reserve capacity). The Sanitation Districts believe that Scenario B should be revised or additional scenario(s) should be added to the Final CSE which would more realistically portray future potential disposal capacity alternatives available during the 15-year planning period. Included in a revised or additional scenario should be an assumption that proposed expansions of existing landfills are permitted but at their existing daily permitted capacities instead of at higher capacities. Instead of assuming that all of the "proposed" new landfills are permitted, it should be assumed that only one new landfill is permitted at a permitted daily capacity of between 8,000 to 10,000 tons per day (see comments provided below for Chapter 6). It should also be assumed that the Commerce MRF, proposed by RailCycle and the Puente Hills MRF, proposed by the Sanitation Districts, are utilized for waste-by-rail projects. It would appear that a scenario which contained these elements would come closer to the conclusion on page 4-26 which states "The anticipated disposal needs of Los Angeles County cannot be met by pursuing a single alternative" than does the current Scenario B.

Chapter 6

Schooll Canyon Landfill

Page 6-5 of the Preliminary Draft CSE provides a list of landfills with expansion capacity, but does not include the Schooll Canyon Landfill. Although the Schooll Canyon Landfill, with its currently permitted capacity, is anticipated to be open for the duration of the time examined in the Preliminary Draft CSE (1996 to 2010), the Final CSE should identify the potential for expansion capacity at the Schooll Canyon Landfill.

While an expansion of the Schooll Canyon Landfill has long been considered a definite possibility and is recognized as such in the Joint Powers Agreement governing the operation of the site, the Sanitation Districts have not yet studied or proposed a definite expansion plan or design. However, the potential for expansion capacity at the Schooll Canyon Landfill was identified in the Solid Waste Action Plan and is stated on page 2-3 of the Preliminary Siting Element. The Sanitation Districts request that the potential for expansion of the Schooll Canyon Landfill also be reflected in Section 6.5 of the Final Siting Element.

Blind/Towsley/Mission-Rustic-Sullivan/Elamgro Canyons

In March 1994, the Los Angeles County Sanitation District No. 2 Board of Directors certified the Final EIR, as supplemented, for the Puente Hills Landfill. On August 30, 1994, the Los Angeles County Board of Supervisors issued a Conditional Use Permit for the Puente Hills Landfill based upon its review of the certified Final EIR. Section 6 of the subject Final EIR, Alternatives, discusses the following items:

- The majority of the property in Blind Canyon is privately owned and has been included in an agreement which would transfer 4,500 acres of the property to the Santa Monica Mountains

G7.1

G7.1 Please refer to Topical Response #9.

G7.2

G7.2 Please refer to Topical Response #9.

G7.2b

G7.2b Please refer to section 7.5, Chapter 7, of the Final Draft CSE.

G7.3

G7.3 Please refer to topical response #6.

Conservancy (SMMC) for use as a regional park. Therefore, the development of a landfill in Blind Canyon may not appear to be feasible without the cooperation of the SMMC.

- As part of a Joint Powers Agreement between the City of Los Angeles and the County of Los Angeles, if Elsmere Canyon is developed into a landfill, Mission-Rustic-Sullivan Canyons could not be used for landfill purposes. Therefore (pending the approval of the Elsmere Canyon Landfill), Mission-Rustic-Sullivan Canyons would be unavailable for use as a landfill. Scenario B shows the Elsmere Canyon Landfill and the Mission-Rustic-Sullivan Canyons Landfill operating concurrently.

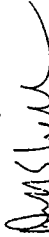
- The Santa Monica Mountains Conservancy has acquired property within the proposed access road and fill area of Towsley Canyon, without which the available fill capacity would be reduced to less than 100 million tons. Subsequent to the certification of the Final EIR, additional property previously owned by the Chevron Corporation within Towsley Canyon has been transferred to the Conservancy, further limiting fill capacity at the site without the cooperation of the SMMC.

The Final CSE, including the analysis of future disposal capacity, should incorporate the above information.

If you have any questions concerning this matter, please call me at the above listed telephone number.

Very truly yours,

Charles W. Carry



Donald S. Nellor
Planning Section Head
Solid Waste Management Department

DSN:RA:sc

G7.4

Please refer to Topical Response #6.

G7.5

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System. See Topical Response #6.

G7.6

Please refer to Topical Response #6.

SANTA MONICA MOUNTAINS CONSERVANCY

14500 CALIFORNIA AVENUE
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 TEL: (310) 311-7271



May 20, 1996

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

**Draft Los Angeles County Siting Element
 and Draft Environmental Impact Report**

Dear Mr. Stone:

The Santa Monica Mountains Conservancy is legislatively mandated to maximize the protection of natural, cultural, and recreational resources within the Santa Monica Mountains Zone which includes the Rim of the Valley Corridor and the whole of the Santa Monica Mountains National Recreation Area (SMNRA). Because the final adopted Countywide Siting Element will guide the County's solid waste disposal, recycling, and resource conservation policy for fifteen years, its content is of great importance to this agency.

In contrast to findings found in the Draft Environmental Impact Report (DEIR) for the Countywide Siting Element (CSE), virtually any substantial landfilling within the Santa Monica Mountains Zone will produce adverse impacts that cannot be mitigated to a level of less than significant. The avoidance of such impacts is not vigorously addressed in the CSE and its associated DEIR.

In regards to avoiding adverse impacts to open space in the Santa Monica Mountains Zone, the CSE, and its DEIR, will remain inadequate until plans are included for reusing, reducing and recycling a higher percentage of trash. Such plans must not state that the County will assist other jurisdictions in utilizing, to the maximum extent feasible, disposal capacity available for expansion within their boundaries. Landfilling should be the option avoided to the maximum extent feasible. The subject documents have clearly reverted priorities by placing disposal as a first course of action behind diversion.

The CSE and DEIR do not provide decisionmakers with adequate information regarding both the ecological and public-land ownership constraints in Towdley, Blind, and Elmore Canyons. The Congressional legislative concerns regarding landfills, or their expansion, in National Recreation Areas are not adequately addressed for Mission, Rustic, and Sullivan Canyons and the Calabasas Landfill.

G8.01 Please refer to Topical Response #2 of the Final EIR Part I, Response to Comments.

G8.02 The CSE was prepared pursuant to State law. State law requires 15 years of disposal capacity for residual waste which remains after recycling, composting, and other diversion activities. Disposal capacity is defined by State law as the capacity provided by landfills and transformation facilities.

G8.03 Comment noted. As indicated in the Draft EIR Section 2.4, Description of Project, each site must undergo a vigorous site-specific assessment and address all environmental concerns as mandated by the California Environmental Quality Act (CEQA).

The issue of accessibility to certain potential new landfill sites was discussed in Chapter 6, Section 6.4 of the Preliminary Draft CSE (Chapter 7, Section 7.4 of the Final Draft CSE). Please refer to Topical Response #2 of the Final EIR, Part I for further discussion.

G8.04 Mission Rustic and Sullivan Canyons have been removed from the document due to designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of a new landfill within the Boundary of any unit of the National Park System. Please refer to Topical Response #4.

G8.01

G8.02

G8.03

G8.04

Mr. Harry W. Stone
Countywide Siting Elements and DEIR
May 20, 1996
Page 2

The cultural, physical, economic, and ecological constraints of providing access roads to Towley, Elmore, and Pined Canyons are inadequate to allow for informed decisionmaking.

The General Plan consistency problems regarding potential landfills, or their expansion, in Significant Ecological Areas (SEAs) has not been sufficiently addressed for decisionmakers relative to Sunshine, Pined, Towley, Rustic and Sullivan Canyons and the Calabasas Landfill. To be adequate, the CSE EIR must address the potential cumulative impacts of destroying a system of environmental preservation encompassing the County's most significant ecological areas.

The County General Plan specifically calls for the avoidance of impacts to riparian woodlands, SEAs, and other identified sensitive ecological resources. The EIR should address in depth the inconsistency between the CSE targeted proposals and the avoidance of these specific ecological areas called for in the General Plan. The CSE should specifically target and identify sites that are not within these General Plan protected areas and resources.

The DEIR also overlooks prohibitions in the City of Los Angeles Mulholland Scenic Parkway Specific Plan (Section 5.A.4.b) relative to potential landfills in Mission, Rustic and Sullivan Canyons.

The CSE and its EIR should provide more comprehensive and meaningful analyses regarding the feasibility of safe medium- and long-term recreational uses on top of closed landfills, particularly in light of expanding evidence of methane gas and other toxicity constraints in existing County landfills.

A glaring inconsistency exists in the documents when the entire supporting analysis of plants and animals in the DEIR (Chapter 5) is less than two pages long and yet the DEIR (Chapter 10.0) can conclude that the CSE will not result in significant irreversible environmental changes.

In contrast, as it is proposed, the CSE will result in significant, adverse, irreversible environmental changes by allowing the siting of solid waste transformation and/or land disposal facilities in areas which are not ecologically suitable for such uses. In addition, these impacts cannot be mitigated below a level of significance.

Where in AB 939 does it state that all disposal capacity must be addressed within Los Angeles County versus some percentage being disposed out of county such as via railtrail?

Sincerely,

Elizabeth A. Cheadle

Elizabeth A. Cheadle
Chairperson

G8.05	G8.05	See response #G8.03.
G8.06	G8.06	Please refer to Chapter 8 of the Final Draft CSE and Topical Response #3-C of the Final EIR, Part I for further discussion.
G8.07	G8.07	Please refer to Chapter 8 of the Final Draft CSE and Topical Response #3-C of the Final EIR, Part I for further discussion.
G8.08	G8.08	See response #G8.04
G8.09	G8.09	Please refer to Topical Response #3-C of the Final EIR, Part I for further discussion.
G8.09a	G8.09a	Please refer to Chapter 6, Section 6.4, Item VI, Biological Resources, page 6-19 of the Draft EIR.
G8.09b	G8.09b	Please refer to Chapter 7 of the Draft EIR and Topical Response #2 of the Final EIR, Part I for further discussion.
G8.09c	G8.09c	The Final Draft CSE, (Chapter 2, Goals and Policies), incorporates expanded goals and policies which, 1) enhance in-County landfill disposal capacity, 2) facilitate utilization of out-of-County remote disposal facilities, and 3) foster development of alternate disposal technologies. Additionally, Chapter 9 of the Final EIR provides an expanded discussion on out-of-County disposal options. Furthermore, the Final Draft CSE includes a new Chapter 5 on alternative disposal technologies and alternative methods for extending the life of existing Class III landfills.

May 20, 1996; Item No. 6
Resolution No. 96-21

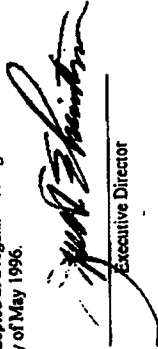
**RESOLUTION OF THE SANTA MONICA MOUNTAINS CONSERVANCY AUTHORIZING
COMMENT LETTER ON LOS ANGELES COUNTY COUNTYWIDE SITING ELEMENT
AND ENVIRONMENTAL IMPACT REPORT**

Resolved, That the Santa Monica Mountains Conservancy adopts the comment letter dated May 20, 1996 to the Los Angeles County Department of Public Works regarding the Countywide Siting Element and its Draft Environmental Impact Report provided that the letter is amended according to the recommendations made by Advisory Committee Member Brown on that same date.

- End of Resolution -

I HEREBY CERTIFY That the foregoing resolution was adopted at a regular meeting of the Santa Monica Mountains Conservancy held on the 20th day of May 1996.

Dated: MAY 21 1996


Executive Director



**NEWHALL COUNTY
WATER DISTRICT**

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6/14/96

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

Re: Countywide Siting Element and Draft EIR

Dear Mr. Stone:

Comments on the Countywide Siting Element

As a public resource agency, Newhall County Water District has pledged to its rate payers to serve the highest quality water at a reasonable cost. For this reason we join with the rest of the water community in their concerns over water pollution caused by Class III landfills. Ground water resources must be protected from pollution if we are to be able to provide a reliable source of water in Southern California. We were dismayed to see that the Countywide Siting Element focuses on landfills as the primary means of handling our solid waste. AB 939 requires that there be 15 years of disposal capacity within each region. This is prudent planning. The legislation does *not* require that that capacity be fulfilled by using landfills. We request that the County put out RFPs for alternative processes and that these processes be included in the siting plan with equal weight.

In reviewing the capacity requirements presented in the Countywide Siting Plan, the District notes that siting of all proposed landfills will result in an extreme glut of capacity. That is even before efforts such as bailing are utilized to reduce the need for new capacity and reduce the production of leachate. Given the impacts on all watersheds, and especially our own, which will result from the siting of these new landfills, we suggest that it is inappropriate to promote a plan with so much excess capacity. Further, excess capacity induces growth and discourages alternatives to landfills by keeping prices artificially low. These impacts were not discussed in the DEIR.

Los Angeles County has some thirty-six Water Agencies who are also charged by State and Federal Law with requirements for the protection of Public health and safety. Our goal is to provide a reliable, potable water supply. This summary document also does not address the potential contamination risks and subsequent assignment of liability responsibility for potential problems to this supply (the basin aquifers) and the actions necessarily associated with their correction when and if required, such as:

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JUN 17 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

G9.1

See Topical Responses #2, #3, #5 & #14.

G9.2

See Topical Response #9.

The details of project specific mitigation measures are beyond the scope of this EIR and will be addressed in the EIR for each facility.

G9.3

See Topical Response #8.

The CSE provides a description of the areas and strategies that may be used to address the state mandates for adequate disposal/transformation capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program.



**NEWHALL COUNTY
WATER DISTRICT**

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Pg. 2

Costs Associated with -

- Additional Monitoring required for potential problem detection (who has the responsibility and how will it be funded?)
- Who pays when an aquifer is "accidentally" contaminated and there is no alternate water source available?
 1. For providing water
 2. For compensation of "lost time" for projects under contract when problems occur.
 3. For jobs lost by manufacturers unable to continue production and research
 4. For devaluation of property due to lack of water

Liability Considerations -

A process flow diagram for the allocation or assessment of risk and the assignment of liability responsibility for correction of contamination must be included in the siting element.

Newhall County Water District has expressed grave concerns over its ability to serve its customers if a landfill is sited in Elsmere Canyon. We note that the County Siting Element focuses only on Elsmere (p.6-4), making it appear the most appropriate location in LA County without any mention of the impacts on water supply or pollution. If a specific site is promoted in your plan, the impacts caused by that site must be discussed in the DEIR. *This is a EIR deficiency.* We therefore suggest you delete discussion of Elsmere Canyon Landfill on Page 6-4 unless you also include discussion of adverse seismic problems, water pollution, impacts to the watershed, sources of alternative water supplies and Forest Service opposition to the project.

Comments on the Draft EIR for the Countywide Siting Element

Newhall County Water District notes that the purpose of an Environmental Impact Report is to disclose environmental impacts so that the decision makers may reach informed conclusions based on an evaluation of the benefits versus the damages caused by a project. We do not believe that this document accomplishes this goal.

Section 4-2 Physical Features

This section should include updated information from the January 17th, 1994 earthquake. Several new features have been identified that may affect

G9.4	G9.4	See Topical Response #8. The CSE provides a description of the areas and strategies that may be used to address the state mandates for adequate disposal/transformation capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program.
G9.5	G9.5	This comment is beyond the scope of the CSE. The CSE provides a description of the areas and strategies that may be used to address the state mandates for adequate disposal/transformation capacity during a 15-year planning period. The CSE serves as a policy manual rather than a specific development program.
G9.6	G9.6	See Topical Response #6. The details of project specific mitigation measures are beyond the scope of this EIR and will be addressed in the EIR for each facility.
G9.7	G9.7	See Topical Response #6.



**NEW HALL COUNTY
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Fig. 3

landfills or expansions in the County. Figure 4-2 should be replaced with an updated map.

Section 5-4 Water Quality

Water resources in the Santa Clarita Valley were not discussed in this section even though Elmore Canyon was specifically mentioned in the siting plan. *This is an EIR deficiency.* Since Elmore is specifically mentioned, the DEIR should state the proximity to the District's wells and recharge areas and the loss of recharge that would be incurred. The DEIR should also list pollutants that are currently leaking from landfills (see attachment). It should state the percentage of landfills currently leaking in California (72% according to a CIWMB report, attachment included.) It should state how long liners are estimated to last (see attachment). It should estimate potential clean-up costs and methods. These impacts must be disclosed to the decision-makers.

Section 6-13 Geology

This section should state which landfills are located in areas of recent seismic activity. Discussion of the January 17th, 1994 earthquake in relation to Elmore and Sunshine Canyon should especially be discussed. The ability or lack thereof of landfill liners to withstand seismic activity should be discussed.

Chapter 7

This chapter 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 Chapter 6 and Chapter 10 which describe significant irreversible impacts. Therefore a statement of over-riding considerations must be made in order to approve the siting element.

Chapter 8

The DEIR must present alternatives. It should explore alternate technologies on a county-wide basis to see if they might create less pollution than those presented in the siting plan. The District is particularly interested in alternatives which would result in less actual or potential water pollution such as bailing, pyrolysis and gasification. Presenting alternatives is a requirement of CEQA.

G9.8 See Topical Response #8.
The details of project specific mitigation measures are beyond the scope of this EIR and will be addressed in the EIR for each facility.

G9.9 See Topical Response #8.

G9.10 See Topical Response #8.
The CSE serves as a policy manual rather than a specific development program. As such, the EIR is not intended to provide detail information on impacts and mitigation measures for the siting of the solid waste disposal/transformation facilities listed.

G9.11 See Topical Responses #2, #3, #8 and #14
The details of project specific mitigation measures are beyond the scope of this EIR and will be addressed in the EIR for each facility.



**NEWHALL COUNTY
WATER DISTRICT**

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Pg. 4

Thank-you for your time and attention to our comments.

Sincerely,

Edwin Dunn
President

Attachments:

1. Newhall County Water District's Consulting Engineer's Analysis
2. Solid Waste Assessment Test Program, Report to California Integrated Waste Management Board, 1995 by Water Resources Control Board, State of California
3. The Toxic Time Bomb: Municipal Liability for the Cleanup of Hazardous Waste, Steven Ferry - Chapter 1, The Hazardous Constituents of Municipal Solid Waste
4. Municipal Solid Waste Management in Lined, "Dry Tomb" Landfills, G. Fred Lee, Ph.D., P.E. and R. Anne Jones, Ph.D.

ALBERT A. WEBB ASSOCIATES
Consulting Engineers

Ref. W O 96-07
File No.

MEMORANDUM

TO: Jean DiAngelous, General Manager
Newhall County Water District

FROM: Sam I. Gershon, Vice President

SUBJECT: Los Angeles County Integrated Waste Management Plan and County Siting Element - Review of California Environmental Quality Act Documents.

DATE: June 12, 1996

Kathleen Dale, Principal Environmental Specialist of Webb Associates Environmental Analysis Division, has reviewed the following documents prepared by Los Angeles County:

Summary Plan of the Los Angeles County Integrated Waste Management Plan - Volume I - The Plan, dated January 1996.

Summary Plan of the Los Angeles County Integrated Waste Management Plan - Volume II - Appendices, dated January 1996.

Proposed Negative Declaration, Initial Study and Environmental Assessment, Summary Plan of the Los Angeles County Integrated Waste Management Plan, dated January 1996.

Los Angeles Countywide Siting Element, dated January 1996.

Draft Environmental Impact Report for the Los Angeles Countywide Siting Element, dated January 1996.

As requested, this analysis has been focused on the water resources issues related to the proposed Summary Plan and Siting Element.

Background

The referenced documents constitute a major revision to the County's current Solid Waste Management Plan to reflect the requirements of California law for planning for solid waste facilities. The plans cover the unincorporated County, as well as all 88 incorporated cities within the County. The Summary Plan is aimed at identifying programs to meet mandated diversions of solid waste from landfills, while the Countywide Siting Element (CSE) is aimed at identifying needed landfill capacity for a fifteen year planning horizon extending to the year 2010. The following summarizes pertinent contents of each of the major plan documents.

- The Summary is primarily focused upon policy programs for source reduction, handling of household hazardous waste, and non-disposal options. The source reduction component is directed at reducing volumes of waste sent to landfills by reducing waste generation at the consumer level, diverting waste to recycling centers, and diverting waste to other recovery-type markets (charities, waste-to-energy, composting). The household hazardous waste component is directed at eliminating hazardous wastes from the waste stream received at the County's Class III landfills. The non-disposal element highlights existing and proposed materials recovery facilities, transfer stations, and composting facilities. This document provides a fairly comprehensive identification of current waste management practices for all municipalities within the County.
- The CSE is the document with more direct relevance to the District. This document presents an analysis of waste generation for the County-wide planning area and on the basis of the estimated demand, idealizes a program of expansions (Antelope Valley, Chiquita Canyon, Lancaster, Lopez Canyon, Puente Hills, Sunshine Canyon) and new landfills (Blind Canyon, Mission-Rustic-Sullivan Canyons, Towley Canyon, Elsmere Canyon) to accommodate that projected demand. Of potential interest to the District are the proposed new landfill locations in Elsmere and Towley Canyons and the suggested expansion of the Sunshine Canyon Landfill.
- The appendices to the CSE include a brief summary report of the results of the "comprehensive" alternative site analysis that led to identification of the proposed sites included in the CSE. It is interesting to note that aside from evaluation criteria that examined geologic formations and seismicity, the criteria did not include any criteria related to water resources.
- The CSE also contains an appendix of siting criteria to be employed in determining the suitability of a proposed landfill site and conformity with the CSE. With respect to water resources, the siting criteria address proximity to wells, depth to groundwater, monitoring location relative to recharge areas, permeability and existing water quality. The criteria for each of these aspects are very general and essentially fall back on established landfill permitting requirements (such as geologic suitability, liners, leachate collection, monitoring wells). Quantified criteria and performance standards would be preferable to the qualitative statements included in the CSE.
- The criteria directed at protecting existing groundwater quality cite a standard of non-impairment. This is substantially different from a policy of non-degradation.
- The CSE recognizes that implementation of landfilling operations at any of the new or expanded sites would be subject to a demonstration of conformance with the CSE and its siting criteria, demonstration of consistency with the local jurisdiction's general plan, site specific technical analyses, CEQA documentation, and local, state and federal permitting.
- The CSE defines a Finding of Conformance process. Any new or expanded landfill requires a finding of conformance with the CSE prior to authorization to begin operations. The process established in the CSE requires the finding as one of the final permitting procedures. An initial screening to throw out entirely unsuitable sites would be more appropriate. Information to perform such a preliminary

G9.12 G9.12 This comment relates to the Los Angeles County Countywide Integrated Waste Management Summary Plan. Please refer to Volume III, Response to Comments regarding the Summary Plan.

G9.13 G9.13 See Topical Response #6.

G9.14 G9.14 See Topical Response #8.

G9.15 G9.15 See Topical Response #8.

G9.16 G9.16 See Topical Response #8.

G9.17 G9.17 This comment has been acknowledged.

G9.18 G9.18 See Topical Response #12.

analysis should be available from the cited alternatives analysis and from the existing EIRs for Elsmere and Blvd/Mission/Towsley.

CEQA Documents

Summary Plan. A draft negative declaration has been prepared for the Summary Plan. The plan is essentially a policy document which focuses upon recommendations for new and expanded administrative and educational programs. The policy statement of primary importance to the District is Goal 6, which is related to waste disposal planning capacity. Goal 6 encourages adoption of the CSE, support for development of new disposal facilities, and expansion of existing facilities. While there are concerns as to the scope and content of the negative declaration as presented, and, further, as to the appropriateness of a negative declaration at all, these concerns are duplicative of the comments on the CSE and will be addressed through that forum.

On a positive note, the policies of the Summary Plan encourage continued development and implementation of programs for the environmentally safe transformation and disposal of solid waste and encourage xeriscape (as a means of source reduction).

Countywide Siting Element. A draft EIR has been prepared for the Countywide Siting Element. The document relies heavily upon a structuring that recognizes that implementation at any of the identified sites would be subject to separate environmental documentation. The following specific comments are noted:

- The District's primary concern with the proposed siting element is the proposal for new or expanded landfill sites within recharge areas associated with the groundwater aquifer that is the District's sole source of local supply. Potential impacts to local water resources are essentially dismissed as being addressed by future geotechnical investigations and established permitting programs.

The draft EIR is entirely deficient in recognizing the nature of the water resource setting. While it is not reasonable to expect analysis to the degree necessary to ultimately permit each of the identified sites, it is not unreasonable to expect the draft EIR to contain more refined setting and potential impact information than the very generalized extract from the County General Plan that is provided. The environmental setting should describe the location of each proposed site or expansion site with respect to surface water and ground water resources (including quality, depth, gradients, recharge areas). Designated beneficial uses and water quality objectives from the Basin Plan should be cited and monitoring records for existing landfills should be presented to document the position that siting and permitting programs provide safeguards necessary to protect beneficial uses.

- The County takes the position that this is a plan-level document and that implementation of any of the recommended sites will be subject to future documentation. The CEQA Guidelines define "project" as the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. It is clear that adoption of the CSE is the initial step in eventual siting of new or expanded landfills at the specific sites identified in the plan. The identification of specific sites provides sufficient basis for general characterization of potential issues and solutions at each site, including abandonment if impacts cannot be adequately mitigated. The proposed sites were

G9.19 This comment relates to the Los Angeles County Countywide Integrated Waste Management Summary Plan. Please refer to Volume III, Response to Comments regarding the Summary Plan.

G9.20 See Topical Response #8.

G9.21 See Topical Response #8.

apparently part of an alternative siting study that should provide suitable background information. Without more site-specific information, a clear case is not made to support the conclusion that there will be no unmitigable significant adverse effects.¹

- The CSE EIR recognizes the existence of the project-specific EIRs in various stages of completion for several of the new and expanded landfill sites. Brief summaries of the analysis and conclusions from each of these related documents should be included in the CSE EIR. The appropriate references and identification of locations where copies of the documents can be obtained for review should also be provided.
- The Sunshine Canyon site is located along the hydrologic divide between the Santa Clara River watershed and the Los Angeles River watershed. From available information, it is not clear how this site is located with respect to the underlying groundwater basins. This issue requires further evaluation.
- The CSE notes that the potential Sunshine Canyon expansion includes lands under the jurisdiction of both the County of Los Angeles and the City of Los Angeles. Although it is stated that the proposed expansion within the County territory would not require new County permits, it is not clear that all other necessary approvals are in place. The City portion of the expansion requires new City approvals and a draft EIR is apparently being prepared.

- One of the recurring themes in previous comments by the District is the fact that new or expanded landfills are not the only solution to disposal capacity issues. The methodology utilized to estimate future generation purportedly follows a methodology dictated by the Integrated Waste Management Board, but would require a substantially greater level of analysis to decipher. Using a simple per-capita rate based upon 1995 actual landfill operation records, the projected total generation would be approximately 14 million tons², in contrast to the approximately 20 million tons estimated by the IWMB methodology. Further substantiation of the Plan's determination of need is required.

Also related to this point is the DEIR's alternatives analysis. The document states a position that there are no reasonable alternatives because the project is adoption of the CSE and the County is mandated by state law to prepare and adopt a CSE. This is a fallacious argument since: (1) the project is the physical improvements proposed by the CSE, (2) the County has complete latitude over the scope and nature of programs proposed to handle projected volumes of waste, and (3) the manner in which the County decides to address waste disposal needs determines the associated environmental impacts. The alternatives analysis should be revised to address non-disposal options and to include information from the earlier siting

¹ It is noted that, while this potentially represents a challengeable "pious-meaning", there would be little practical benefit in making such a challenge on light of the fact that EIRs are already being processed on the various sites of importance to the District.

² 1995 generation rate is approximately 1.6 tons per capita, based upon 15.6 million tons actual landfill deliveries and 9.5 million people. Considering the additional 25% source reduction required by the year 2000 at 1.2 tons per capita, the projected 2010 population of 11.5 million people would generate 13,800,000 tons of waste.

G9.22	G9.22	The details of project specific mitigation measures are beyond the scope of this EIR and will be addressed in the EIR for each facility.
G9.23	G9.23	See Topical Response #8.
G9.24	G9.24	See Topical Response #8.
G9.25	G9.25	See Topical Response #9.
G9.26	G9.26	See Topical Responses #1, #2 and #14.

studies to substantiate the lack of reasonable alternatives to the proposed landfill sites.

- The limited discussion of seismic impacts is based upon a 1971 study of the San Fernando earthquake. The EIR should incorporate information from the 1994 California Division of Mines and Geology fault activity map and those studies that have been prepared subsequent to the Northridge quake. The EIR should include a comparison of monitoring well results before and after the Northridge quake.

As a point of information, it is noted that other counties are typically preparing negative declarations for their plans, using the same argument that any future facility expansion or siting would be subject to separate documentation.

Conclusion and Recommendation

The points noted above raise several questions as to the validity of many base assumptions in the CSE and several questions as to the adequacy of the CSE DEIR. It would be appropriate to transmit these concerns to the Los Angeles Department of Public Works in the form of a comment letter.

G9.27

G9.27 See Topical Response #8.



UPPER SAN GABRIEL VALLEY
MUNICIPAL WATER DISTRICT

June 12, 1996

Los Angeles County Department of Public Works
Environmental Programs Division
Post Office Box 1460
Alhambra, CA 91802-1460

RECEIVED
JUN 18 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS


Subject: Comments on the Los Angeles County Draft Countywide Siting
Element, the Draft Countywide Integrated Waste Management
Summery Plan, and related Environmental Documents

Gentlemen:

Enclosed is a copy of the Upper San Gabriel Valley Municipal Water District's Resolution
No. 6-96-345 declaring its policy to oppose the Construction of any new or expansion of any
existing landfill in the San Gabriel Valley.

Please view this Resolution as our comment and opposition to any new or expanded landfill
in the San Gabriel Valley.

Very truly yours:


Robert G. Berfien
General Manager

Enclosure

G10.1

G10.1 This comment is acknowledged.

11310 VALLEY BOULEVARD • EL MONTE, CALIFORNIA 91731
PHONE: (818) 443-2297/(213) 283-2400 • FAX: (818) 443-0017

DIRECTOR: KENNETH E. MANNING, PRESIDENT: DR. ICKY FELLOW, VICE-PRESIDENT: FRANK L. FORBES, SECRETARY/TREASURER: MARK W. JOE COCHRAN, D. WILLIAM "BILL" ROBINSON

RESOLUTION NO. 6-96-345

A RESOLUTION OF THE BOARD OF DIRECTORS OF THE UPPER SAN GABRIEL VALLEY MUNICIPAL WATER DISTRICT DECLARING ITS POLICY TO OPPOSE THE CONSTRUCTION OF ANY NEW OR EXPANSION OF ANY EXISTING LANDFILL IN THE SAN GABRIEL VALLEY

WHEREAS, The Main San Gabriel Groundwater Basin provides the drinking water supply for over one million residents in the San Gabriel Valley and , as such, is an extremely valuable and irreplaceable resource; and

WHEREAS, the physical characteristics of the Basin make it extremely susceptible to groundwater contamination and/or degradation from solid waste disposal landfills; and WHEREAS, studies by the District's engineer and by other agencies indicate that the operation of existing solid waste disposal landfills in the San Gabriel Valley pose a threat to Basin water quality and it is clear that the expansion of said landfills would only increase the threat of such contamination; and

WHEREAS, the threat to Basin water quality from the construction of any new or the expansion of any existing landfill in the San Gabriel Valley is unacceptable.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE UPPER SAN GABRIEL VALLEY MUNICIPAL WATER DISTRICT as follows:

Section 1. The Board of Directors of the Upper San Gabriel Valley Municipal Water District hereby declares its policy to oppose the construction of any new or expansion of any existing landfill in the San Gabriel Valley.

Section 2. The General Manager is directed to transmit a copy of this Resolution to those Regulatory Agencies charged with planning and/or permitting new or expanded landfills in the San Gabriel Valley.

Printed this 21st day of June, 1996.

ATTEST:

[Signature]
SECRETARY

United States Department of Agriculture
Forest Service
Angeles National Forest
701 N. Santa Anita Avenue
Arcadia, CA 91006-2725
818-374-5209 Text (TTY)
818-374-1613, Vol 158

File Code: 1950

Date: June 14, 1996

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JUN 19 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

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

Ref: Comments concerning the Los Angeles County Draft Countywide Integrated Waste Management Plan

Dear Mr. Stone:

The Angeles National Forest has received your draft documents for the Countywide Siting Element, Integrated Waste Management Summary Plan, and related Environmental documents.

The Angeles National Forest, along with the County of Los Angeles Department of Regional Planning, has been involved in the preparation of an EIR/EIS for the Proposed Elsmere Solid Waste Management Facility for the past several years. That document is expected to be final in November, 1996.

The Angeles National Forest Land and Resources Management Plan (Forest Plan) has review criteria for which the U.S.D.A.- Forest Service must make findings to determine if the proposed Elsmere Solid Waste Management Facility project meets those criteria. At the time of issuance of the Draft EIR/EIS, the Forest was not fully convinced that the proposed project met all the criteria specified in the Forest Plan. The Forest Service Preferred Alternative was "No Action".

Work continues on the Proposed Elsmere EIR/EIS, including updating information, reviewing public comments, and preparing responses to comments. Currently, no additional information on integrated Waste Management needs has been presented that would change the "No Action" recommendation to the Regional Forester.

This is based on the following:

- * Other potential in-county sites have potential for development.
- * Existing in-county landfills have the potential for expansion.

Caring for the Land and Serving People

FS-6200-28 (7-82)

G11.1 Please refer to Topical Response #6.



Department of Public Works - Pg.2

- * Waste diversion has not been developed to its full potential.
 - * Exportation to out-of-county facilities has not been developed.
- No final decision has been made on the part of the Forest Service for the Proposed Elsmere Solid Waste Management Facility. A Record of Decision signed by the Regional Forester will be issued documenting any findings and decision after careful review of all information presented to us.

The Angeles National Forest encourages the County of Los Angeles to explore long term options for waste diversion and disposal for the benefit of the people in Los Angeles County. It would appear that the County of Los Angeles has many avenues to explore in order to solve the waste situation within Los Angeles County.

We appreciate the opportunity to review your documents. Should you have any further questions concerning this matter, please contact Charles McDonald at 818-574-5257.

Sincerely,

MICHAEL J. ROGERS
Forest Supervisor

cc: LADRP
TRD

G11.2 This comment is acknowledged.



Caring for the Land and Serving People

FS-6200-28 (7-82)

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LOS ANGELES CLC

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IN WASTE MGT.

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MOTION

During the 1980's the City of Los Angeles seriously considered an option to create electricity from conversion of our waste streams. New technologies, and the political unacceptability of land filling creates a need for the City of Los Angeles to once again look at this option. With the closure of the last City owned landfill, economic uncertainties in the future City budgets, and state requirements to reduce waste streams, a second look at disposal of trash and production of free energy is called for.

I THEREFORE MOVE that the CAO, Board of Public Works, Bureau of Sanitation, and CLA formulate a working task force to review new technologies for Waste-To-Energy plants.

I FURTHER MOVE that this task force also look at the necessity of siting such facilities as needed throughout the City according to areas of collection and access to power distribution systems.

I FURTHER MOVE that the task force investigate the associated costs and revenue potential of each technology and report to the City Council options available to the City and suggested general areas to locate facilities in a way as not to be a burden to any one area of the City.

G12.1

G12.1 Please refer to Topical Responses #2 and #14.

MOVED BY

RAUL BERENSON
Councilman 12th District

SECONDED BY

See 010

RECEIVED
OFFICE OF THE CLERK
JUN 28 1996 11:25:50

People's Eq. No.	7871	Date	6/11/96	Page	1
City	Los Angeles	From	R. Berenson		
Division		To	CLC		
Phone #		Phone #			
Fax #		Fax #			



United States Department of the Interior

NATIONAL PARK SERVICE
Santa Monica Mountains National Recreation Area
30401 Agoura Road, Suite 100
Agoura Hills, California 91301

IN REPLY REFER TO:
L76(SAMO)

AUG 22 1996

RECEIVED

AUG 26 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

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

Reference: Draft Environmental Impact Report for Countywide Siting Element and
Countywide Integrated Waste Management Summary Plan

Dear Mr. Stone:

The National Park Service has reviewed the Countywide Siting Element (CSE), Draft
Environmental Impact Report (DEIR) and Summary of the Countywide Waste Management
Plan. Hopefully, the following comments will be helpful.

The most important critical information that must be included in the final Environmental Impact
Report (as stated in the Federal Register/Vol.59, No. 245/ December 22, 1994) is:

*The National Park Service (NPS), in accordance with 16 U.S.C. 460f-22, by this
rule restricts the creation of new solid waste disposal sites in units of the National
Park System and controls the operations of such sites, in existence as of
September 1, 1984, so as to minimize adverse effects to the environment and
visitor enjoyment in units of the National Park System.*

Please include the following information in the EIR, perhaps under Section 3.3.6 Federal
Agencies along with the U.S. Environmental Protection Agency: Public Law 98-506 applies to
all land and waters within the boundaries of all units of the National Park System, whether those
lands and waters are federally or nonfederally owned. In order to comply with Public Law 98-
506, the operation of solid waste landfills within National Park System boundaries require a
permit issued by the Field Director of the National Park Service.

The Calabasas Landfill is the only landfill within the boundary of the Santa Monica Mountains
National Recreation Area (NRA), a unit of the National Park System. The Los Angeles County
Sanitation Districts are in the process of obtaining the necessary permit to continue to operate the
Calabasas landfill.

G13.1 The Mission/Rustic-Sullivan canyons site, which is located within a unit of the National park System, has been eliminated for future consideration as a potential new landfill site, in the Final Draft CSE.

G13.2 Chapter 6, Section 6.3.2.3, Discretionary Permits, has been revised in the Final Draft CSE to include the U.S. Department of Interior, National Park Service, as one of the agencies from which a permit may be required. Also, Section 6.5.8 (pg. 6-24) lists the U.S. Department of Interior, National Park Service, Pacific West Field Area as one of the Federal agencies which may need to be contacted regarding their respective jurisdictional control and required permits.

G13.3 This comment has been acknowledged.

G13.1

G13.2

G13.3

Candidate Landfill Sites within the National Recreation Area

The inclusion of Mission, Sullivan, and Rustic canyons as potential new class III landfills is unrealistic. These canyons are not viable options in light of the statements of Congressman Beilenson, Regional Director Albright, and Park Superintendent Gackenbach.

Congressman Anthony C. Beilenson said in his press release of October 30, 1990 that Mission, Rustic, and Sullivan Canyons do not fit into the narrow exceptions to a future landfill site in this area:

I call on the County to adhere to federal law and abandon all plans to place a landfill here. I urge the County to join us in pursuing a way to preserve this land and add it to the large expanse of open space that we are trying to establish here.

In a letter (March 28, 1995) from NPS Regional Director Stanley T. Albright to Mr. Michael Rogers of the U.S. Forest Service concerning the consideration of Mission, Rustic, and Sullivan Canyons as alternatives for the Elsmere Canyon Landfill:

NPS recommends that the Mission-Rustic-Sullivan Canyons alternative site for the landfill not be considered as an option.

In a letter (November 30, 1990) from Park Superintendent, David E. Gackenbach to Mr. Donald S. Nellor, Solid Waste Management of the County Sanitation Districts:

A landfill within our boundary [NRA] is not a feasible alternative and therefore should not be included in the EIS.

Perhaps for clarity all reference to Mission, Sullivan, and Rustic canyons as future landfill sites should be deleted from the Final Environmental Impact Report or the opposition to these sites stated.

Environmental Impacts

Contrary to the findings in the Draft Environmental Impact Report, the siting of most landfills, especially within the Santa Monica Mountains, will produce significant adverse environmental impacts to aesthetics, air quality, landform alteration, and biological resources. We believe these environmental impacts cannot be mitigated to levels of "less than significant."

If Townsley, Blind, Elsmere, Sullivan, and Rustic canyons are to remain in the Final Environmental Impact Report more information about the ecology of these canyons is essential. This information is critical for decision makers if Los Angeles County is serious about conserving natural resources and protecting the environment as stated in CSE pg 2-1.

SEAs

The environmental value of some of the candidate sites was previously identified and designated by the County of Los Angeles Board of Supervisors as Significant Ecological Areas (SEAs). Townsley and Blind canyons are located within SEA 20, and Mission, Sullivan, and Rustic canyons are within SEA 11.

G13.4

G13.4 These canyons have been eliminated for further consideration as a potential new landfill site in the Final Draft CSE.

G13.5

G13.5 This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.

G13.6

G13.6 (cont'd) G13.6 The CSE establishes Siting Criteria which all proposed disposal facilities must meet. The Siting Criteria stipulates that proposed facilities should avoid sensitive areas such as wetlands, habitats of threatened or endangered species, etc., and the facilities must be in conformance with the jurisdiction's General Plan (which incorporates land use designations, such as SEAs and restricts other potential uses within those areas). With these and other Federal, State and local laws and regulations as safeguards, no significant impact on unique biological resources or rare species is anticipated.

G13.7 The term "protect" as used in the CSE's Siting Criteria is in reference to the additional level of review of proposed disposal facilities which is provided by the CSE's Siting Criteria. The Siting Criteria has been developed to provide planners and decision makers with a uniform set of guidelines and standards that may be used to identify both potentially viable sites and significant siting concerns.

G13.8 The Mission/Rustic-Sullivan canyon site has been eliminated from further consideration as a potential landfill site. All potential impacts associated with this site are thus eliminated. Please refer to Topical Response #6 for further information.

G13.9 See Topical Responses #8.

G13.10 The Final Draft CSE (Chapter 4) incorporates an expanded discussion regarding whether Los Angeles County can meet the State's 15-year disposal capacity mandates under various scenarios. However, it should be noted that the scenarios are provided for this purpose only. The CSE in no way requires or guarantees that any specific facility will be developed.

Page 5-30 mentions the importance of SEAs and the need for SEA protection. We realize, however, that this Draft Environmental Impact Report is intended to be an overview document and that specific plans will be prepared; however, in the absence of specific environmental assessments, the following statement found on page 6-19 needs clarification to remove ambiguity:

The construction of solid waste transformation and land fill disposal facilities may require the removal of vegetation and animal habitat. However, no significant impact on unique biological resources or rare species is anticipated.

In addition, regarding SEA protection, please clarify how violation of the integrity of SEAs is reconciled with the County's General Plan.

Objectives

We agree with the stated "objectives" of the Countywide Siting Element (CSE). However, please define "Protect" within the context of how the construction of landfills as proposed by the CSE and DEIR will "Protect Surface Water, Protect Air Quality, or Protect Environmentally Sensitive Areas" [emphasis added]. How will impacts from project implementation protect these resources?

Biological Resources

Mission, Sullivan, and Rustic Canyons all have blue-line streams and they are County designated Environmentally Sensitive Areas. Construction of landfills in these canyons will destroy critical core habitat. The DEIR admits that biological inventory studies have not been conducted for any of the proposed sites, but such studies will be conducted in the future as needed. We, therefore, are concerned about the pre-study finding of no significant impact for biological resources (DEIR, pg 6-19); we believe this finding is based on insufficient information lacking substantial data (less than one page). Emphasis is placed on unique and rare species; however, the intrinsic value of core habitat to both the flora and fauna that live there and to visiting recreationists seeking relief from megalopolis must also be considered.

Cultural Resources

It is of paramount importance that thorough archaeological studies be conducted before a finding can be made. We believe that more than one paragraph (DEIR, pg 6-21) of information about cultural and historical resources is necessary to adequately describe resources found and discuss mitigation.

Unsuitable candidate sites

Please provide a contingency scenario for selecting substitute sites to replace those sites that are ultimately deemed unsuitable for landfills. For example, what sites would be selected to replace Mission, Sullivan, Rustic as candidates and would the criteria used to select new sites be the same or weighted differently?

Comments for specific paragraphs:
CSE pg 5-4, Section 5.3.2.3 Discretionary Permits add:
"National Park Service" where appropriate under:

Permit to construct; and,
Permit to operate.

CSE Pg 5-24, Section 5.5.8 Other Agencies add: National Park Service, Pacific West Field Area.

CSE Pg 6-2, fifth bullet, satisfying the permitting requirements of . . . Federal agencies with jurisdiction over the project.

The Environmental Impact Report must include the National Park Service as one of the federal agencies if the proposed site(s) are within the boundary of a National Park System unit.

Appendix 6-A, pg 10, Siting Criteria, please include:

The site will not degrade any natural or cultural resources of a National Park Unit.

The site is not located within the 500 year floodplain, or in a wetland.

The site is not located within one mile of a National Park Service visitor center, campground, ranger station, entrance station, or similar public use facility, or a residential area.

The site will not be detectable by public sight, sound, or odor from a scenic vista, a public use facility, a designated or proposed wilderness area, a site listed on, or eligible for listing on the National Register of Historic Places, or a road designated as open to the public.

The site will receive less than 5 tons per day of solid waste, on an average yearly basis.

The proposed closure and post closure care is sufficient to protect the resources for the National Park System unit from degradation.

AIR QUALITY

The documents have failed to demonstrate quantitatively how the proposal will "protect" the air quality. Any incremental negative contribution to the South Coast Air basin, a non-attainment area with the most serious air quality problem in the nation (DEIR pg 5-11) must be considered adverse and significant. There is no evidence that even the best available practices will be adequate to protect the air quality. Decision makers must know what the projected saugunary contributions to the atmosphere are likely to be and how those contributions will affect humans, animals, plants, and cultural resources.

G13.11

This comment has been addressed in Chapter 6, Section 6.3.2.3 of the Final Draft CSE.

G13.12

This comment has been addressed in Chapter 6, Section 6.5.8 (pg. 6-24) of the Final Draft CSE.

G13.13

The Final Draft CSE contains no potential new or expansion of existing landfill sites within boundaries of any unit of the National Park System. Also, the U.S. Department of Interior, National Park Service has been listed in the Final Draft CSE (Chapter 6) as one of the Federal agencies which may need to be contacted regarding their respective jurisdictional control and required permits. Please refer to Topical Response #8 for further discussion.

G13.14

This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.

Conclusion

The National Park Service believes that the implementation of the Countrywide Siting Element will result in significant, adverse, and irreversible environmental disruption. If the County allows the siting of solid waste land disposal facilities in areas that are not thoroughly studied for ecologically suitability there will be environmental impacts to these sites that are adverse and significant. These impacts cannot be mitigated to a level of insignificance.

Thank you for the opportunity to review this project.

Sincerely,



Arthur E. Beck
Superintendent

w/enclosures: Federal Register Vol. 59, No. 245

CC: Honorable Anthony Beilenson, House of Representatives
Zev Yaroslavsky, Supervisor, 3rd District, Los Angeles County
Stanley T. Albright, Field Director, Western Field Region
Joseph Edmiston, SMMC
Dan Preece, California State Parks

G13.15

G13.15 This comment has been acknowledged.

4.1.96

My name is Susan Crawford Vila. I am a resident of Quartz Hill. I am speaking on behalf of LASER and as a concerned private citizen. May I assume you are recording these informational hearings?

I have several questions for the Department of Public Works. I am genuinely interested in your responses, so I will be happy to submit my testimony at its conclusion.

The question of where new dumps should be put is a bit like asking, when did you stop beating your wife. Your top four selections are fascinating.

- Why did you utilize information that's one to two decades old ~~and~~ as a basis for your top four choices?

- Why have you chosen four Significant Ecological Areas in which to site dumps?

- Did you consider the profound loss of environment, sensitive animal and plant habitat that the siting of these dumps would cause?

- Why have you chosen two sites that are owned by the Santa Monica Mountains Conservancy, namely Towsley and Blind canyons, particularly when you know they will never allow such land use and that they are already set aside for public parks?

- Why would you choose Mission-Rustic-Sullivan Canyons when they've been staunchly protected for over 30 years by people who will never allow you to dump there again?

- Why would you choose Elsmere, which is National Forest land, when they've already said they will not allow such land usage nor transfer of lands?

- Have you accurately studied the true costs of landfilling, including post-closure costs?

- Have you accurately compared landfilling costs to alternatives such as remote site rail haul, bioconversion, composting, recycling, reduction, material recovery facilities, ad infinitum and concluded correctly that landfilling is far more expensive?

- What happens 30 years after closure when the dump operator is no longer responsible for the site? Do you think these sites can just be abandoned?

- Who pays for the centuries of toxic clean-up?

- Are you aware that Germany has outlawed dumps entirely because of the unending billions of dollars wasted on vain attempts to contain the toxics at just a single site?

P1.1 thru P1.30
Please refer to response in Appendix B, Table B-1,
Beginning with comment #10

P1.1

P1.2

P1.3

P1.4

P1.5

P1.6

P1.7

P1.8

P1.9

P1.10

P1.11

PI.12

- Have you considered that Operating Industries Landfill in this County has already spent over \$100 million in post-closure expenses, and its far from over?

- Your County Wide Summary Plan includes praiseworthy recycling and education efforts. Why not put more emphasis in those areas? It's likely to generate far more public support.

PI.13

- In your DEIR under Alternatives Section on page 8-2 you state, "Since the County is mandated by State law to prepare the CSE, no other alternative is considered feasible to attain the objective of this project. As such, none will be considered." Are you dismissing viable and environmentally superior alternatives to siting dumps?

PI.14

- Are you actively implementing more of such alternatives now so that the remaining landfill space -- at conservative estimates, at least 15 years' worth -- can be utilized far effectively?

PI.15

- Wouldn't those 15 years of available dump space satisfy the requirements of AB939 that you're trying to address with these documents?

PI.16

- Are you considering that the City of Los Angeles is implementing numerous measures to cut their waste stream by 70% by the Year 2020?

PI.17

- Have you taken fully into account the effect on the waste stream that recycling of green waste, glass, plastics, metals, building materials, and mixed paper recycling has on the waste stream?

PI.18

- Did you consider new and existing technologies such as the Bedminster Bioconversion system and its effects on the waste stream?

PI.19

- Have you considered the EPA mandate to reduce methane gas emitted by landfills?

PI.20

- Why do your population projections not reflect the genuine shrinkage of growth in L.A. County over the last 10 years?

PI.21

- Did you take into account the effect on the waste stream of the diversion of waste to Orange County, the result of recent contract negotiations?

PI.22

- Are you ignoring overtures from Riverside County and other locations out of County and out of State for dump sites?

PI.23

- Why do you use that ridiculous 'we won't let IA be held hostage' argument?

P1.24

- Don't your "shortfall" and "excess capacity" tables indicate that with the advent of alternatives, there is no need for new landfills?

P1.25

- Do you consider that "disposal capacity" does not have to mean "landfill capacity," that WRF's and the like should be taken into account?

P1.26

- Are you trying to create a scenario to justify the siting of Elsmere to somehow override the National Forestry Department?

- You mention, among others, the possibility of expanding Waste Management's Lancaster facility. Are you aware that the company publicly admits they have to monitor an uncontrollable toxic plume that's flowing out into the desert? Do you know you have only to drive by on any one of our many windy days to see massive amounts of litter scattered all over the desert well beyond the dump? Do you know the last cell they dug, they hit water table, and they've used that cell for garbage anyway?

P1.27

- Are you aware that we know every single dump in the County has violations, health hazard issues, leakages, close proximity to populations and water supplies, and sundry other negative impacts on people and the environment?

P1.28

- Browning Ferris Industries predicted panic and garbage in the streets if Sunshine were closed. Do you recall that nothing whatsoever happened; in fact, no one needed that dump then and now?

P1.29

- Do you really not care that the companies you're dealing with have extremely unsavory connections, not to mention public reputations for being very bad at what they are being paid large sums of money to do?

P1.30

I realize that you think the public is out of touch with the realities of waste management. But we're not. The reality is, this seemingly ill-prepared report does little to address the genuine problems of garbage disposal and land management.

Ladies and gentlemen, I respectfully suggest that it behooves you to get far more state-of-the-art and lose your dump mentality before you're considered as passe as the dumps you're touting.

BRENTWOOD COMMUNITY FEDERATION

REPRESENTING NINE HOME-OWNERS GROUPS
BRENTWOOD GLEN ASSOCIATION • BRENTWOOD HILLS ASSOCIATION • BRENTWOOD HOMEOWNERS
ASSOCIATION • BRENTWOOD TERRACE HOMEOWNERS ASSOCIATION • CRESTWOOD HILLS ASSOCIATION •
MANDEVILLE CANYON ASSOCIATION • SOUTH BRENTWOOD HOMEOWNERS ASSOCIATION • SULLIVAN
CANYON ASSOCIATION • UPPER MANDEVILLE CANYON ASSOCIATION
POST OFFICE BOX 49779 • LOS ANGELES, CALIFORNIA 90049

April 5, 1996

RECEIVED
APR 0 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROTECTION DIVISION

Mr. Mike Mohajer
L.A. County Dept. of Public Works
Waste Management Division
900 South Fremont Avenue
Alhambra, CA

Re: Countywide Siting Element and Summary Plan of Countywide Integrated Waste Management Plan

Dear Mr. Mohajer:

The preliminary draft, Los Angeles Countywide Siting Element ("CSE") identifies Mission and Rustic-Sullivan Canyons as possible sites for future landfills. Specifically, Mission and Rustic-Sullivan Canyons are "tentatively reserved" in the CSE. Use of Mission and/or Rustic-Sullivan Canyons as landfill sites is inconsistent with the Brentwood Pacific Palisades District Plan of the Los Angeles General Plan. Additionally, many years ago when the County Sanitation District sought a conditional use permit to expand Mission Canyon Landfill, its request was denied by the City of Los Angeles. Since then the City has consistently demonstrated its opposition to the use of these Canyons as landfill sites. The residents of Brentwood, Encino, Sherman Oaks, Pacific Palisades and West Los Angeles communities, as well as residents from throughout Los Angeles, have expressed their opposition to using the Santa Monica Mountains that they are encompassed by the Santa Monica Mountains National Recreational Area. Given the legal, environmental and political barriers to the use of Mission and Rustic-Sullivan Canyons for landfills, the Brentwood Community Federation urges the County to remove these properties from the list of "tentatively reserved" sites in the CSE.

Very truly yours,

BRENTWOOD COMMUNITY FEDERATION

By: T. Larry Waits, President

TLW:ld
cc: Supervisor Deane Dana
Mayor Richard Riordan
Councilman Marvin Braude
Jean Mladick

P2.1 This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.

P2.2 These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

See Topical Response #6.

BRENTWOOD HILLS HOMEOWNERS ASSOCIATION

POST OFFICE BOX 49495 • LOS ANGELES, CALIFORNIA 90049



April 4, 1996

Mr. Mike Mohajer
L.A. County Department of Public Works
Waste Management Division
900 South Fremont Avenue
Alhambra, California

Re: Mission/Rustic-Sullivan Canyons:
Countywide Siting Element and Summary Plan

Dear Mr. Mohajer:

The Brentwood Hills Homeowners Association represents 332 homes on the west ridge of Mandeville Canyon next to Sullivan Canyon in West Los Angeles. Our community abuts Sullivan and Rustic Canyons and includes the trailheads into those canyons used by thousands of hikers, bicyclists (including Mayor Riordan), runners and nature-lovers as a gateway into the rustic beauty of the Santa Monica Mountains.

For many years we have expressed our opposition to the ridiculous proposal coming from some quarters to convert these spectacular natural assets into a solid waste landfill. People come from all over the County to enjoy the mountain vistas, panoramic ocean views from the ridges and trails, and the wildlife that abounds in these two canyons. It is a heritage for us to pass on to future generations.

The latest incarnation of this proposal, designed to wreak havoc on an ecosystem, is reminiscent of the proverbial Medusa's head; which every time it is cut off, reappears somewhere else. It should be laid to rest once and for all.

The very thought of blighting one of the last precious pristine canyons in this wing of the Santa Monica Mountains is an outrage. Brentwood Hills Homeowners Association joins thousands of Angelenos in demanding that Mission/Rustic-Sullivan Canyons be dropped from the list of proposed new Class III landfills.

Very truly yours,

Loretta Dittlow
Loretta Dittlow,
Vice President

cc: Hon. Richard Riordan
Hon. Marvin Braude
Hon. Zev Yaroslavsky

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APR 28 1996

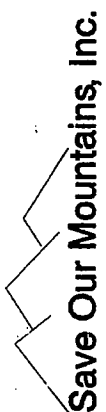
DEPARTMENT OF PUBLIC WORKS
WASTE MANAGEMENT DIVISION

P3

P3

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

See Topical Response #6.



Save Our Mountains, Inc.

10860 Wilshire Blvd., 10th Floor Los Angeles, CA 90024 Voice (310) 444-6452 Fax (310) 444-6420

April 5, 1996

Mr. Mike Mohajer
Los Angeles County Department of Public Works
Waste Management Division
900 South Fremont Avenue
Alhambra, California

Dear Mr. Mohajer:

Re: Rustic and Sullivan Canyons

Save Our Mountains, Inc. (SOMI) is a coalition of four homeowners associations and over 11,000 individuals who have signed our petitions to preserve Mandeville and Sullivan Canyons from despoilation, development and blight.

Recently we learned of the upcoming hearings on an alleged proposal to designate Mission/Rustic-Sullivan Canyons as "Potential New Class III Landfills" in the heart of the Santa Monica Mountains. This suggestion is an outrage. These canyons are one of the last beautiful unspoiled areas in the heart of the City of Los Angeles and are accessible to, and used by, tens of thousands of hikers, nature lovers, mountain bikers and equestrians. They comprise a critical component of the 18,000-acre "Big Wild" stretching across the spine of the Santa Monica, home to a wide array of wildlife.

The very thought of converting any portion of this pristine wilderness into a solid waste landfill is obnoxious. We urge the County to delete these canyons from the list of possible landfills without delay.

Very truly yours,

Eric F. Edmunds, Jr.,
Chair

EFE:mc
cc: Hon. Zev Yaroslavsky
Hon. Marvin Braude
Hon. Richard Riordan
H:EFESOMI/MOHAJER.1

- Honorary Chairpersons
Lyn & Norman Lear
- Board of Directors
Markens Bronson
Jane Callahan
Loretta Dillow
Eric Edmunds
John Greenberg
Joe Harter
Fred Hill
Joe Jones
Raymond Lobjols
Marianna Pells
Brad Rosenberg
Randy Sherman
Lury Webb
- Advisory Committee
Allen Adams
Beatrice Arthur
Martha Alexander
John Berman
Geoffrey Corbin
Warren Handlar
Gary Harwitz
Susan Hametz
David Hoberman
Claudia Kenna
Stephen Kenna
Alan Kishbaugh
Julie Koff
Jean Madrick
Joel Pash
Gail Randall
Beverly Ribatch
Dance Cooper-Richman
Jeanne Shuman
John Steiner
Jean Trousdale
- Counsel
Carlyle Hall, Jr.

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APR 10 1996
DEPARTMENT OF PUBLIC WORKS
WASTE MANAGEMENT DIVISION

P4

P4

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

See Topical Response #6.

Once it's gone, it's gone forever

Arguments Against A Landfill in Mission Canyon

I'm Louise Frankel. I reside at Mountaingate, and I'm a member of the Executive Committee of the Mission Canyon Coalition. The coalition represents Bel Air Knolls, Bel Air Skycrest, Bel Air Crest, and Mountaingate as well as the Curtis, Berkeley Hall, Murman, Westland, and Steven Wise schools, and the University of Judaism, the Skirball Cultural Center and the Steven S. Wise Temple. You will hear directly from some of their representatives.

The request by the County Sanitation District for a conditional use to utilize Mission Canyon as a sanitary landfill has been twice denied overwhelmingly by the Los Angeles City Council, first in 1977, and again in 1981.

Those denials came after extensive public hearings and exhaustive environmental studies revealing the overwhelming impact on the area, and resulting in the City Council's determination that legal findings could not be made to allow the dumping of garbage in Mission Canyon.

Today, 15-to-19 years after those decisions came down, the impact would be significantly greater. Keep in mind that, in addition to thousands of additional residents, Mission Canyon and all its environs have become an educational-cultural corridor with six schools, a church, a synagogue, a university and a cultural center on the periphery of the proposed landfill. *No. of people + children 100's of adults + adults + children*

The Mission Canyon area has critical traffic problems, often resulting in gridlock on major commuting corridors along Sepulveda Boulevard, Mulholland Drive and the San Diego Freeway. Additional traffic generated by a landfill, would impact thousands of commuters between the Westside and the Valley and Downtown.

Sepulveda Boulevard is a trap for two major communities, Bel Air Crest and Mountaingate, both of which have only one egress or ingress for daily travel or disaster evacuation. Mountaingate Drive, the only entrance to approximately 3000 homes, is approximately 110 feet from the entrance to Mission Canyon. Additional traffic generated by the opening of the Skirball Cultural Center and the Getty Museum will not only increase car travel in the area, but multiply tour buses and school buses as well.

P5.1

P5.1

These canyons have been removed from the document due to the designation of the area as part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6.

2

Mission Canyon was previously the site of a landfill; and that activity did incalculable harm. That first landfill polluted the area with volatile methane. Today and every day, some 1500 cubic feet per minute is being pumped out from 15 wells placed in critical areas. The methane has caused numerous fires, has resulted in the abandonment of property on the perimeter judged to be unsafe.

As a result of that earlier landfill, buried in that canyon today, there are five million, two hundred and fifty thousand tons of refuse. Fifty percent of it, according to the E. I. R., is volatile. This danger is acknowledged by the fact that —by court order— there are at least 45 permanent probes and explosimeters that measure the methane in and around Mission Canyon. These probes are located on developments off of Mullholland, Bel Air Knolls and Bel Air Skycrest, as well as in Mountaingate. They require monitoring so any off-site migration of methane gas will be detected and investigated. The movement of countless additional vehicles into the area would only increase the danger of explosion and fire set off by a spark. In 1980, a downed power pole ignited brush in the vicinity of a school. The brush was fed by seeping methane. The flames were so intense a fire department facility located less than a half mile away could not stop the blaze. That fire burned across Mission Canyon, burned open areas surrounding Mountaingate, jumped Mandeville Canyon, and was not stopped until it reached Malibu. Fires have erupted in the rough below fairways, and have burned across the grass of the Mountaingate golf course, *and along Sepulveda Blvd.*

Plans for a major development were abandoned in 1988 partly because of unmonitored methane.

There are also legal reasons why you can not place another landfill in Mission Canyon, not the least of which is that the Sanitation District, when it first gained access to the canyon, agreed that the area would be turned over for parkland. Mission Canyon is "open space" on the Community Plan. For a whole litany of other legal prohibitions, including lawsuits for inverse condemnation in loss of value to homes and institutions, we suggest you consult with the Los Angeles City Attorney.

Mission, Sullivan and Rustic canyons are all of a piece. —A special natural resource smack in the middle of a densely populated city that is 'park poor.' These environmental gems —extensively used by

P5.2

P5.2

This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.

P5.3

P5.3

This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.

P5.4

P5.4

This comment pertains to an issue of environmental impact. Please refer to the Final Environmental Impact Report, Part I, Comments and Responses.

3

thousands from all over the city, as well as the residents of the area—
should be cherished, not violated and polluted.

In closing, please allow me to read an excerpt from your
own statement of criteria for siting a landfill:

QUOTE: "The objectives of the siting criteria are to
protect the public health and safety and our natural resources. Protect the
residents, protect air, surface water and groundwater quality. Protect the
environmentally-sensitive areas. Insure safe transportation of solid waste.
Insure the structural stability and safety of the landfill, and protect the
social and economic well-being of the community." END QUOTE.

Given the conditions in existence and the jeopardy to
residents and institutions in the area by pollution of air, water and the
natural environment of the mountains, we in the Mission Canyon Coalition,
don't believe you can meet either the necessary legal findings or any your
own criteria.

Louise Frankel
12623 Promontory Rd
S.A. 90049
310/471-3702

P5.5

P5.5

These canyons have been removed from the document due
to the designation of the area as a part of the Santa Monica
Mountains National Recreation Area which is a unit of the
National Park System. Existing Federal law prohibits the
siting of new landfills within the boundary of any unit of the
National Park System.

Please refer to Topical Response #6.

April 11th, 1996

publicos. Reciclaje de zacate es una practica dejando recortes de zacate en el zacate despues de que es cortado, por lo tanto, produciendo menos recortes de zacate. Xeriscaping es la practica de ornamental con matas no sequitas que producen menos desperdicios de yarda.

Pregunta 9: ¿Que sera las responsabilidades Condado y las ciudades cuando el Plan Preliminar sea final y aprobado por CIWMB?

Respuesta: El Condado de Los Angeles Departamento de Obras Públicas es la agencia responsable por las siguientes funciones relacionadas del Plan Preliminar: plan de administración, información pública, presupuestos, y implementación de acrecimientos de programas en existencia por el Condado.

Las Ciudades y Condado tendran responsabilidades iguales en la implementación de los programas nuevos por el Condado.

Pregunta 10: ¿Dónde podemos obtener informacional o saber de la condición del Plan Preliminar?

Respuesta: Todas preguntas pueden dirigirse a:

Departamento de Obras Públicas del Condado de Los Angeles
División de los Programas Medioambiental
P.O. Box 1460
Alhambra, CA 91802-1460
(800) 552-5218, lunes - jueves, 7:00 a.m. - 5:30 p.m.

*I don't feel that it was fair to allow the residents of West LA to address the Mission Runter Sullim site and the residents of Santa Clarita were denied the privilege of discussing Elsmere. We should be able to discuss these specific sites as part of the Document. (805) Pet Salatore 296-2577
SCOPE
SC Civic Assn
SCU Pride Committee
SCU Sierra Club
LASER
SCU Canyons Plus*

P6

P6

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

See Topical Response #6.



April 18, 1996

Re: L.A. County Integrated Waste Management Draft Summary Plan
(for hearing April 18, 1996, Taft High School)

Dear Members of the "Listening Team" for this evening's meeting:

Since these meetings are for the "general public's involvement in the planning process", we hope that our input will be considered and responded to in a meaningful way, empowering those who care enough to be involved.

General Statement:

I would like to urge that there be City and County-wide bans on all plastic containers that cannot be recycled. Presently only plastics marked "1" and "2" are eligible. That leaves "3, 4, 5, 6, 7, and 8" as costly elements for disposal, both environmentally and fiscally for which the public pays. The County of Los Angeles should be directed to enlist the support of the state legislature to enact appropriate legislation state-wide, thus reducing the burdens for both local governments and the taxpayers. Vendors should be our allies, not our enemies, in their use of recyclable plastics or they should bear the costly burden of disposal of the un-recyclable.

Instead of pitting community against community in the choice of the next canyon landfill, logic dictates a more aggressive recycling campaign, through education and legislation.

Specific suggestions:

1. Under Section VII (c) "Impacts and Mitigations", the answer should be "site specific" (i.e., Sunshine Canyon has documented adverse reactions for people in its environs.)
2. All of Table 4 ("Summary of Environmental Impacts and Mitigation Measures") the word "unavoidable" precludes utilization of known remedies, not the least of which would be "no project" or consultation with and implementation of professionals in the appropriate field.
3. Again, (Summary of Environmental Impacts and Mitigation", Table 4, all columns marked "none" under "unavoidable" should be re-considered by professionals in the appropriate fields before such a blatant admission of "none" is made.
4. Same Table 4 of "Summary" should not rely on following a code as a mitigation: Code compliance is already your legal obligation!

P7.1 P7.1 These comments are acknowledged.

page 1

5. In the "Question and Answer" section, Question 6, it is stated : "The Task Force developed the goals, policies, and siting procedures..." It is our understanding that a Task Force subcommittee made comments on this Siting Element. One's conclusion must arbitrarily be that the Answer is not accurate nor reflective of the reality. Why didn't this occur?

6. Question 9: If in fact your criteria (considered in protecting public health and safety) are accurate, all in-County new landfills should and would be eliminated for consideration.
page 2

7. There should be a Question 12 to read as follows:

Why weren't out-of-County landfills discussed and charted as extensively as in-County landfills, as well as incorporated in calculations of disposal capacity (15 years)?

If out-of-County landfills are included in calculations of future disposal capacity, there is no landfill shortage. Why weren't those large landfills, many of which are closer to permitting than any new in-County landfills, considered as part of the County's future land filling capacity? Why aren't markets, recycling and other reduction programs being more vigorously pursued by the County?

Thank you for the opportunity to have these comments and questions included in your process.

Sincerely,

Jill Swift, President
Friends of Caballero Canyon

P7.2

P7.2

The Task Force delegated this authority to the Plan Review Subcommittee. The actions of the Subcommittee have the full weight of the Task Force.

P7.3

P7.3

This comment is acknowledged.

P7.3

P7.3

Please refer to Topical Response #5.



2550 237th Street
Irvine, California 92605
(714) 539-7150
Fax (714) 539-3933

April 22, 1996

LOS ANGELES COUNTY
DEPARTMENT OF PUBLIC WORKS
900 South Fremont Avenue
Alhambra, California 91803

SUBJECT: Comments to the Countywide Siting Element and Summary Plan,
Dated January 1996

ATTENTION: Mr. David Smith
Environmental Programs Division

The following are suggested changes to the Countywide Siting Element:

- 1) Glossary of terms, page xvi, the terms aerobic and anaerobic now state, "...in the presence or absence of free oxygen." This should be changed to read, "...in the presence or absence of air or oxygen", not free oxygen (alone).
- 2) Page 3-2, 3.3.1, third paragraph, eighth line, "hydraulic continuity" should read 1×10^{-6} cm/sec, not 1×10^{-7} cm/sec.
- 3) Page 3-5, 3.4, second paragraph, fourth line, "...landfills, six minor ..." should read, "...landfills, five minor..."
- 4) Page 10, asterisk at bottom of page is defined, but not found anywhere in the page text.
- 5) Page 18, "Adivari" should be removed (insure accuracy of names).
- 6) Page xviii, Garbage (definition) suggested added phrase, for clarification, parenthesize: (Garbage in other California codes is inclusive with refuse, trash, rubbish and related solid waste).
- 7) Page 3-10, table 3-1 (continued), lists the facility Two Harbors as being closed September 1995. Why not remove this facility from the facility listing?

P8.1	P8.1	This has been revised in accordance with Title 14, Section 17852 of the CCR. Please refer to the Glossary of Terms in the Final CSE.
P8.2	P8.2	The hydraulic conductivity factor is correct as discussed in accordance with 40 CFR Section 258, Subtitle D.
P8.3	P8.3	This comment is acknowledged.
P8.4	P8.4	This comment is acknowledged.
P8.5	P8.5	This comment is acknowledged.
P8.6	P8.6	This comment is acknowledged.
P8.7	P8.7	This comment is acknowledged.

8) Page xx, Permitted Daily Capacity. The definition of this phrase names the various "permits" necessary, and ends with, "..., whichever is less." In the various tables and figures throughout, Puente Hills Landfill shows two (2) daily capacity values...12,000 and 13,200. One number should be used throughout, to be consistent with the definition. The change should be made accordingly.

P8.8 This comment is acknowledged.

The following are suggested changes to the Summary Plan:

- 1) Glossary of terms, page xi, the terms aerobic and anaerobic should be changed as indicated in #1 above.
- 2) Page xix, Garbage (definition) the same applies as stated in #6 above.
- 3) Page 4-21, table 4-6 (listings). The correct address for Falcon Refuse Center is: 3031 East "I" Street, not 30301.
- 4) Page xxxviii Special Waste. This now indicates, Department of Health Services, sections 66310, 66740 and 66744, which was repealed in 1991. This entire definition must be rewritten to accurately reflect the Department of Toxic Substances Control involving sections 66261.120, 66261.122, 66261.124 and 66261.126 (see attachments).
- 5) Table 5-19, listing for Falcon Refuse Center now reads (location) Long Beach. Change location to state: Los Angeles.

In addition, the following comment is made involving the Summary Plan, Volume II. On each "survey form" Falcon, in items 11 and 16, is called "Falcon Transfer Station, L.A." The correct name is: Falcon Refuse Center, L.A.

Sincerely,



Clarence W. Gieck
Director, Technical Services

Attachments

STOP THE ELSMERE CANYON DUMP

WHEREAS, A proposal has been made by the County and City of Los Angeles with BKK corporation, a private waste disposal firm, to construct a landfill in the Santa Clarita Valley, in an area known as Elsmere Canyon, and a portion of the proposed landfill is on property owned by the people of the United States and protected under the stewardship of the United States Forest Service with the explicit charge of protecting the watersheds in those mountain regions; and

WHEREAS, Elsmere Canyon contains an active perennial stream with noteworthy cascades, a stream which discharges into an aquifer relied upon by the residents of the Santa Clarita Valley for safe drinking water; has extensive flora, fauna, geologic and other features which merit protection and preservation under the United States Forest Service under the definition of Significant Ecological Areas within L.A. County; constitutes a wildlife corridor for migration of species between the San Gabriel Mountains and the Santa Susana Mountains; has an extensive fossil record for the study of paleontology; and has an historical significance dating back to initial Spanish explorations of California; and

WHEREAS, The County and City of Los Angeles can greatly reduce landfill demand by better utilizing recycling and recovery methods, and alternative sites for landfills are available which would not have the adverse impacts associated with Elsmere Canyon; and the development of a landfill with Elsmere Canyon would destroy the Canyon as a watershed, ecological area, wildlife corridor, scientific resource and historical point of interest; now

THEREFORE BE IT RESOLVED, that the Los Angeles County Democratic Central Committee reaffirms its strong commitment to protecting and preserving our environment by opposing the construction of a landfill in Elsmere Canyon; and

THEREFORE BE IT FURTHER RESOLVED, that the Los Angeles County Democratic Central Committee send copies of this resolution to all State Democratic legislators, to the California Democratic Congressional Delegation, to President Bill Clinton, to Vice President Al Gore, to Interior Secretary Bruce Babbitt, and to the United States Forest Service, and also urges all Los Angeles County Democratic Central Committee members to contact their elected officials regarding their opposition to the Elsmere Canyon Landfill.

Sponsored by: Ron Gillis, Region 11 Director, California Democratic Party;
Carol Blad, Chair, Democratic Party of San Fernando Valley;
Ken Johnson, Chair, 36th Assembly District
Democratic Club of the Santa Clarita Valley.

Adopted unanimously: 9-7-93 by Los Angeles County Democratic Central Committee

p9

p9

Please refer to Topical Response #6 and #8.

DIANE TRAUTMAN

for U.S. Congress
25th District

April 22, 1996

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

Statement at Public Hearing in Santa Clarita:

My name is Diane Trautman. I'm a resident of the Santa Clarita Valley and the Democratic Candidate for Congress. I'm here to register my rejection of the Draft Siting Element listing Elsmere Canyon as Los Angeles County's priority location for a landfill.

Others with greater knowledge of landfills and their effect on the environment have testified about the specific flaws in the Draft Siting Element; but having lived in the malodorous environment surrounding BKK's West Covina landfill, I can tell you that a dump in Elsmere Canyon will have a detrimental social and economic impact on local communities.

Los Angeles County may be hard-pressed financially, but the County will have to find some other way to make a buck besides trashing our valley. The people of Santa Clarita have and will continue to oppose the ravaging of Elsmere Canyon and the County is wasting time and taxpayer dollars fighting us.

I recommend that you delete Elsmere from your siting element.



Diane Trautman

P10 P10 Please refer to Topical Response #6.

Paid for by the Committee to Elect Diane Trautman
PO Box 801084, Santa Clarita, CA 91380
Phone & Fax: 805-297-1121 ★ Email: diane1996@aol.com
FECH# C00310334 ★ World Wide Web: <http://users.aol.com/diane1996/>

Draft
Evaluation Framework for Waste Management Technologies

by
Tom Owen

Many issues affect one's opinion and decision in selecting an appropriate technology for your area or region. Timing with planning, and financial support should be factored in to your decision.

In order to assist the user in reminding him or her of the importance to reaching a wise decision, thirty one pages of USEPA highlights (*Decision-Maker's Guide to Solid Waste Management Volume II*) with decision making criteria are provided for the reader to review before entering your score.

The following simplified worksheets are provided below to remind the user of the many variables that should be factored into one's decision. Before entering your selection on the assessment spreadsheet, review each worksheet, enter your own comments and considerations in the right column and then score for yourself the final rating at the end of each worksheet.

Criteria Comments

1. Adverse Environmental and Public Health Impacts are important ?
2. Siting new facilities is difficult.
3. Have existing landfills reached true capacity ?
4. What are the trends and symptoms of the solid waste dilemma ?

Statements

Municipal waste management service is the responsibility of all elements of society. Roots of municipal waste and solid waste dilemma is the underestimation by local, state and federal governments on the importance of providing safe and effective waste management.

Industry has designed, manufactured and packaged products with little regard of by-products disposal requirements.

Individuals consume products with little thought of disposal issues.

Disposal facility owners/operators have historically considered environmental issues of secondary concern to business practices.

SCAG WORKSHEETS

1

031

4/5/96

P11 P11 This comment is acknowledged.

April 14, 1996

Los Angeles County Dept. of Public Works
Waste Management Division
900 S. Fremont Avenue
Alhambra, Ca. 91803

Att: Mr. Mike Mohajer

Dear Mr. Mike Mohajer;

My wife, Ferdows Rahbar, and I, Scion Rahbar, residing in 3045 Elvado Dr., Los Angeles, Ca. 90049, were shocked and angry when you referred to Mission Canyon again as an alternative for possible site for landfill, while we know that:

- a) This has been considered and debated in the past for several times and has been put away from list of alternative sites for ever.
- b) The terrible adverse effects on public health.
- c) The great adverse effect on the value of properties in area. (I know the effect on the value of my resident alone would be lowering it by more than \$350,000.00.) And this loss must be compensated by Waste Management, if ever the Mission Canyon is used for land fill.
- d) The effect on the safety of traffic on already congested 405 F.W., during both construction and operation of landfill.

However, we are writing this letter to you to express our strong objection to the consideration of the said canyon again as possible site for landfill. We strongly suggest to remove the name of Mission Canyon from the list for ever.

I can assure you, the landfill trucks should go over our bodies, to go to Mission Canyon, as a landfill.

We do again express our objection to the said consideration

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APR 22 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

P12 P12

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6.

of the Mission Canyon as an alternative site for landfill, and appreciate in advance your co-operation in eliminating the Mission canyon from the list.

Very truly yours,



Scion and Ferdows Rahbar
3045 Elvido Dr.
L.A. Ca. 90049

A



Respond. to:
Richard Seeley
3924 El Caminito St.
La Crescenta Ca, 91214

April 21, 1996

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

RECEIVED

APR 24 1996

DEPT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Attn: Donald L. Wolfe
Deputy Director, Public Works

Dear Mr. Wolfe:

Your letter of March 4, 1996 along with relevant material on the L.A. Integrated Waste Management Plan has been referred to the L.A. County League of Women Voters and the undersigned. Allison Fuller is no longer involved in this matter locally.

After wading through most of the material contained in the plan, it is our view that there are areas of solid waste control that need primary emphasis; emphasis that only cursorily appears in the EIR and the Siting documents and is routinely dismissed as too expensive or against public opinion or both.

Full and complete consideration must be given to the following three segments of solid waste management and, as we enter the 21st century, implementation should be mandatory:

First, funding and research on alternative methods of waste disposal such as non-polluting incineration, pyrolysis, waste-to-energy facilities, and as yet undiscovered approaches must be given priority.

Second, intense and continuing public education regarding the above alternatives and prevention of solid waste in the first place, items like excessive packaging, conspicuous consumption, insistence on complete biodegradable packaging and so on must be enacted.

Lastly, correlative to these proposals and in the overall interest of community sustainability there should be an agreement to limit growth, both commercial and residential, for as long as it takes to create and implement the educational and alternative programs.

Obviously, landfills are the easiest to implement and the cheapest to operate but they are neither a viable nor a long term solution to the problem of solid waste disposal. Additionally, since the

LEAGUE of WOMEN VOTERS of LOS ANGELES COUNTY is an inter-league organization

Down City • Beverly Hills • Chino Hills • Chino • Fontana • Fullerton • Industry • Long Beach • Los Angeles • Burbank • Glendale • Pasadena • Pomona • San Gabriel Valley • San Jose • San Luis Obispo • Santa Ana • Santa Monica • South Pasadena • Torrance • Whittier

P13.1 Please refer to Topical Responses #2 and #14.

P13.2 This comment is beyond the scope of the CSE.

costs as well as the profits fall basically upon private waste haulers, the interest in alternatives lags.

The County League believes we must eliminate or severely reduce our reliance on landfills as the primary disposal source not only in Los Angeles County, but nationwide as well. It would appear that incineration and pyrolysis are nearly pollution free methods of disposal with the only negatives being cost and funding. Money must be found, by increasing taxes and fees if necessary, to create citywide or tri-city disposal plants with only the residue created by these plants transported to landfills. To continue with the primary emphasis upon landfills as a solution to our solid waste disposal problems is tantamount to disaster.

Thank you for submitting the siting material and the EIR for review. I trust you will keep us advised in the future as to public meetings and other information updates.

Sincerely,

Jean E. Berger

Jean E Berger
President, LWV/LAC

Richard Seeley

Richard Seeley
Energy Director

P13.3

P13.3 Please refer to Topical Responses #2 and #14.



UCLA School of Medicine
DEPARTMENT OF NEUROLOGY

ROBERT C. COLLINS, M.D., CHAIRMAN
FRANCES STARK PROFESSOR OF NEUROLOGY

REED NEUROLOGICAL RESEARCH CENTER
710 WESTWOOD PLAZA
LOS ANGELES, CALIFORNIA 90024-1769
(310) 825-5521
FAX: (310) 825-1730

April 23, 1996

RECEIVED
APR 29 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROBLEMS

Mr. Mike Mohajer
Los Angeles County
Department of Public Waste
Waste Management Division
900 S. Freemont Avenue
Alhambra, CA 91803

Dear Mr. Mohajer:

Sunday morning my wife and I went for a walk up Sullivan Canyon to enjoy the fresh morning air, bird nesting and wild flowers. Three hundred yards into the canyon we heard the squawking of the green parrots high in the Sycamore trees. Much to our surprise, when we looked to discover the source of their annoyance, we spotted a bobcat resting on a limb high in one of the trees. My wife and I regularly hike the trails of the Santa Monica Mountains from Sullivan Canyon to Magoo Point, but this was the first time we had ever seen bobcat. And imagine - within ten minutes of the start of Sycamore Canyon! What a delight.

We must find ways to protect this planet Earth - not just for our own enjoyment, but for the survival of the animals and wild life that share it with us. For these reasons, I strongly believe that everything possible should be done to find alternative sites for waste disposal other than the canyons of the Santa Monica Mountains. We must protect and manage these carefully if they are to survive and we are to share them for the treasures they hold.

Thank you for your consideration.

Sincerely,

Robert C. Collins, M.D.
Professor and Chairman

RCC/ar

memos@lrs/mohajer.ltr

P14

P14

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Please refer to Topical Response #6.

christine kummer-hardt 2305 westridge road, los angeles, ca. 90049 tel: 310 476 9389 fax: 310 471 5108

Mr. Mike Mohajer
LA Department of Public Works
Department of Waste Management
900 South Fremont Ave.
Alhambra, Ca. 91803

RECEIVED

MAY - 1 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

RE: Mission, Rustic-Sullivan Canyon Landfill

Dear Mr. Mohajer,

As concerned citizens of Los Angeles and residents of the Rustic-Sullivan Canyon area, we strongly object to another attempt to use these precious last natural canyons as a landfill.

For many years, and more than ever now these canyons are being used by thousands of people from all over Los Angeles and surrounding communities for recreation.

Studies show that landfills are obsolete. Many operational recycling firms are handling solid waste (some recycle 100%) in parts of LA. Below are just a few reasons why this site should never be used as a landfill:

- * The destruction of those canyons would have a major impact on the environment.
- * The loss of the natural habitat of wildlife.
- * Potential catastrophic impact in cases of natural disasters like earthquakes, floods, or fire.
- * Access to the sites through the already congested traffic conditions on the westside.
- * Danger of contamination of drinking water through erosion of landfill exposing underlying waste material, etc.etc.

Los Angeles should be the leader in recycling as we head into the 21st century, not the destroyer of a beautiful county and city by polluting and burying itself in trash.

Sincerely,
Christine Kummer-Hardt
4-27-96

cc Yaroslavsky
Braude

P15

P15

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Please refer to Topical Response #6.



704 Santa Monica Boulevard, Santa Monica, CA 90401 213-319-1271

ERD

D-

AIR BRUCE MICHAJOS
LOS ANGELES DEPT PUBLIC WORKS
DEPT WASTE MANAGEMENT
900 SOUTH FREEMONT BL
ALHAMBRA, CA 91803

4/28/96

RECEIVED

4-1-1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

DEAR MR. MICHAJOS:
AS A CONCEALED RESIDENT OF THE MISSION RISTIC-
SANTANA AREA, I SINCERELY OPPOSE ANY FURTHER AFFIDAVIT
TO USE OUR CANYONS AS A LANDFILL. THE AREA IN
QUESTION IS A RESIDENTIAL AND RECREATIONAL
LANDUSE ENJOYED BY THOUSANDS AND THOUSANDS OF
PEOPLE.

WE ARE APPROACHING THE 21ST CENTURY. SOCIETY
WE HAVE THE TECHNOLOGY TO RECYCLE 100% IN PARIS,
RECYCLING PROVIDES A PROFIT IN SOME COUNTRIES.
FUNDS COULD BE USED TO HELP THE CITY OF LOS ANGELES
SOLID WASTE SYSTEM DRASTICALLY.

IT IS UP TO OUR CITY REPRESENTATIVES TO
STOP THIS OUTRAGE AND INIATE A PROGRAM TO
MAKE LANDFILLS UNNECESSARY

Sincerely,

S. T. THOMPSON
2505 FERGUSON DR
LOS ANGELES, CA 90019

P16

P16

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Please refer to Topical Response #6.

6 PD

Nancy Hult & Sid Ganis

April 30, 1996

Mr. Mike Mohajar
Los Angeles Department of Public Works
Department of Waste Management
900 South Fremont Avenue
Alhambra, CA 91803

RECEIVED

MAY - 1 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

Dear Mr. Mohajar:

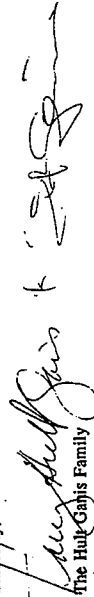
As a concerned citizen of Los Angeles and resident of the Mission Rustic-Sullivan canyon area, I strongly oppose another attempt to use our canyons as a landfill. For years, this area has been used by hundreds of thousands of people from all over Los Angeles and the surrounding communities for recreation.

Landfills are obsolete. Many operational recycling firms are handling solid waste (some recycle 100%) in parts of Los Angeles and throughout the country. Below are reasons this site should not be used as a landfill:

- EPA admits even the best liner and leachate collection system will eventually fail due to natural deterioration.
- 2,000 year old Roman landfills have leachate flowing from them.
- Groundwater contamination takes place as leachate travels through liner to groundwater.
- Virus, anaerobic bacteria, and deadly hazards from waste culture are not addressed.
- Natural disasters such as earthquakes, heavy rains resulting in flooding followed by leachate runoff to surface waters, landslides, erosion of landfill exposing underlying waste materials are real threats.

Los Angeles should be the leader in recycling as we head into the 21st century, not the destroyer of a beautiful county and city by polluting and burying itself in trash.

Sincerely,


The Hult Ganis Family

HCG:ia

cc: Zev Yaroslavsky
Marvin Braude

P17

P17

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Please refer to Topical Response #6.

Dr. Arnold L. Lowe, M.D.

*Mike McKinley
Los Angeles Department of Public Works
Department of Waste Management
900 South Fremont Ave.
Los Angeles, Ca. 90009*

April 30, 1996

RECEIVED

MAY - 1 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

Dear Mr. McKinley,

I have lived in the Brentwood Hills area of Los Angeles since 1965. During this time I have become very well acquainted with Sullivan Canyon. My first experience in the Canyon was in 1965 when I was a Boy Scout going to summer camp at Camp Joseph in the next canyon (Quinto Canyon). A group of scouts went over into the completely wild Sullivan Canyon to see a supposed hide out of Joaquin Murrieta. Today the Canyon is used by hundreds of hikers, bikers, and equestrians as the nearest as the nearest "wild area" in the Los Angeles area. I had monthly hikes for the Terra Club, which have 25 to 30 participants each time. Every weekend there are families with young children giving them their first experience with nature.

The idea of filling this area with trash is absurd. The nearby Mountain Gate Golf Club, built in a dump site now leaks noxious gases and has settling problems which are very expensive to repair. Many years ago a representative from the County Sanitation District came to speak at my Terra Club meeting. He gave representation on Sanitary Landfills. How wonderful that Los Angeles County has so many canyons that could be filled and then turned into parks or golf courses. I asked "what if people want a natural canyon instead of a park". The speaker sloughed my question aside. "Everyone wants a park rather than a wild canyon". I don't think so. The reasons not to use the canyons for dump sites are too many to list. The proximity to homes, the recreational value, the geologic and pollution parks etc. These sites should be given or sold to Mountain Conservancy for use as a part of the Santa Monica Mountain Park System.

Sincerely Yours,

Arnold Lowe

P18

P18

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Please refer to Topical Response #6.

Arnold L. Leroy, M.D.
Vice President, Brentwood Hills Homeowner Association
1416 Sander, Santa Monica Mountain Trail Farm, Santa

18006 Blythe Rd.
Los Angeles, Ca. 90048

Club

LRD

April 30, 1996

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MAY - 1 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL SERVICES

Mr. Mike Mohajer
Los Angeles Department of Public Works
Department of Waste Management
900 South Fremont Ave.
Alhambra, California 91803

Dr. Mr. Mohajer:

As a concerned citizen of Los Angeles and resident of the Mission Rustic-Sullivan canyon area, I strongly oppose another attempt to use our canyons as a landfill. For years, this area has been used by hundreds of thousands of people from all over Los Angeles and the surrounding communities for recreation.

Landfills are obsolete. Many operational recycling firms are handling solid waste (some recycle 100%) in parts of LA and throughout the country. Below are reasons this site should not be used as a landfill:

- * The air quality would be affected and would create objectionable odors
- * The many vehicle trips would cause traffic congestion
- * Would cause risk of hazardous materials, chemicals, oils, pesticides
- * Has the potential to degrade quality of environment, wildlife and plant communities

Los Angeles should be the leader in recycling as we head into the 21st century, not the destroyer of a beautiful country and city by polluting and burying itself in trash.

Yours truly,



J. S. Baker

JSB:ern

cc
Yaroslavsky
Braude

P19

P19

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6.

Mr. Mike Mohajer
Los Angeles Department of Public Works
Department of Waste Management
900 South Fremont Ave.
Alhambra, CA 91803

April 29, 1996

Dear Mr. Mohajer,

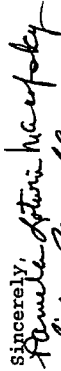
We are outraged at even the suggestion of using the Mission, Rustic-Sullivan Canyons for a garbage dump. This beautiful recreational area has been and is currently used by hundreds of thousands of people from all over Los Angeles for hiking, biking, horseback riding, birdwatching and other wholesome activities. It is one of the few wilderness areas left in Los Angeles.

Solid waste can and should be processed and recycled. In Los Angeles and other parts of the country this is being done effectively.

The hazards of using this area as a garbage dump are already well known, and include an earthquake epicenter, contamination of drinking water, methane and other noxious gases, virus and bacteria from waste culture. This is not an all-inclusive list and doesn't even touch on the destruction of wildlife and other environmental concerns.

When you consider the "good for LA County", be sure to consider all the people of LA County who need clean air, clean water, and a safe and nearby recreational and wildlife area.

Sincerely,



Pamela Lotwin Macofsky
Sidney Macofsky

2103 Queensferry Road
Los Angeles, CA 90049

cc
Mr. Zev Yaroslavsky
Mr. Marvin Braude

RECEIVED

MAY - 1 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

P20

P20

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Please refer to Topical Response #6.

3000 West Alameda A.
Sunnyvale, CA 91523
818 840-3833
Fax: 818 840-4245



John J. Agostino
President

RECEIVED
MAY - 2 1986
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

April 30, 1996

Mr. Mike Mohajer
Los Angeles Department of Public Works
Department of Waste Management
900 South Fremont Ave.
Alhambra, CA 91803

Dear Mr. Mohajer:

I am writing this as a concerned citizen of Los Angeles and a long time resident of the Mission Rustic-Sullivan canyon area. I strongly oppose yet another attempt to use our canyons as a landfill. For years, this area has been used by hundreds of thousands of people from all over Los Angeles and the surrounding communities for recreation. Stop by and see what would be destroyed by this project!

Landfills are obsolete. Many operational recycling firms are handling solid waste (some recycle 100%) in parts of LA and throughout the country. Below are reasons this site should not be used as a landfill:

- Natural disasters such as earthquakes, heavy rains resulting in flooding followed by leachate runoff to surface waters, landslides, erosion of landfill exposing underlying waste material are real threats to humans and wildlife.
- Groundwater contamination takes place as leachate travels through liner to groundwater.
- Recycling saves landfill space, pollution of land and water and energy.
- Virus, anaerobic bacteria and deadly hazards from waste culture are not addressed.

P21

P21

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Please refer to Topical Response #6.

Los Angeles should and must be the leader in recycling as we head into the 21st century, not the destroyer of a beautiful county and city by polluting and burying itself in trash.


John Agoglia

2513 Pesquera Drive
Los Angeles, California 90049

JA/am
cc: Yaroslavsky; Braude

DS

RECEIVED

MAY - 2 1986

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

May 1, 1996

Dear Mr. Mohajer:

As a concerned citizen of Los Angeles and resident of the Mission Rustic Sullivan canyon area, I strongly oppose another attempt to use our canyons as landfill. For years, this area has been used by hundreds of thousands of people from all over Los Angeles and the surrounding communities for recreation.

Landfills are obsolete. Many operational recycling firms are handling solid waste (some recycle 100%) in parts of LA and throughout the country. Below are reasons this site should not be used as a landfill.

- Earthquake epicenter located at southern/ lower end proposed landfill. USGS map, Quaternary Faults and 1978-84 Seismicity of the LA Region.
- Traffic on the west side is already congested to a point of near gridlock.
- Vital Urban Environmental Balance improves air Quality, protects ground water, raises water tables and counters green house effect.
- Public Law 98-506 prohibits landfill sites on park land areas not in operation by September 1984.

Los Angeles should be the leader in recycling as we head into the 21st century, not the destroyer of a beautiful county and city by polluting and burying itself in trash.

Your truly,

cc
Yaroslavsky
Braude

P22

P22

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Please refer to Topical Response #6.

RECEIVED

MAY - 2 1986

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

May 1, 1986

Dear Mr. Mohajer:

As a concerned citizen of Los Angeles and resident of the Mission Rustic Sullivan canyon area, I strongly oppose another attempt to use our canyons as landfill. For years, this area has been used by hundreds of thousands of people from all over Los Angeles and the surrounding communities for recreation.

Landfills are obsolete. Many operational recycling firms are handling solid waste (some recycle 100%) in parts of LA and throughout the country. Below are reasons this site should not be used as a landfill:

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Your truly,



cc
Yarosiauskus
Braude

P23

P23

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Please refer to Topical Response #6.

RECEIVED

MAY - 2 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

Mr. Mike Mohajer
Los Angeles Department of Public Works
Department of Waste Management
900 South Fremont Ave.,
Alhambra, CA 91803

Dear Mr. Mohajer:

As a concerned citizen of Los Angeles and resident of the Mission Rustic-Sullivan canyon area, I very strongly oppose another attempt to use our canyons as a landfill. For years this area has been used by hundreds of thousands of people from all over Los Angeles and the surrounding communities for recreational purposes.

Landfills are obsolete. Many operational recycling firms are handling solid waste (some recycle 100%) in parts of LA and throughout the country. The reasons for not using this area as a landfill are many, but to mention a few: a landfill is incompatible with the existing use of the area, it will have a negative impact on ground water, it will pollute the air and cause objectional odors, it will congest an already congested traffic area (its only access is Sunset Blvd.)-the list goes on and on.

Los Angeles should be a leader in recycling, not a destroyer of one of the remaining natural areas in our city. Your consideration will be appreciated.

P24

P24

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Please refer to Topical Response #6.

Richard Alday
310-472-7157

4/29/96

DS

Dear Mr. Mike Pacheco,

I am writing to protest the designation of Mission/Kanitz/Sullivan Canyon as a potential landfill site. Use of this site as a landfill is inappropriate for a number of reasons, among which are the destruction of parkland areas, devastation of an established residential neighborhood, ~~and destruction~~ locating a landfill on an earthquake epicenter (USGS map, Quaternary Faults and 1978-84 Seismicity of the LA Region) and contamination of Santa Monica's ^{primary water} Reservoir in the aquifer beneath the Riviera Country Club.

Please remove Mission/Kanitz/Sullivan Canyon from the potential landfill site ^{with} immediately. It would be a waste of taxpayers dollars to pursue this designation or use.

Sincerely,
 Linda Ellen Weber
 2410 Westridge Rd
 Los Angeles, CA 90049

cc Verostovsky
Brande

P25

P25

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Please refer to Topical Response #6.

RECEIVED

MAY - 2 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

May 1, 1996

Dear Mr. Mohajer:

As a concerned citizen of Los Angeles and resident of the Mission Rustic Sullivan canyon area, I strongly oppose another attempt to use our canyons as landfill. For years, this area has been used by hundreds of thousands of people from all over Los Angeles and the surrounding communities for recreation.

Landfills are obsolete. Many operational recycling firms are handling solid waste (some recycle 100%) in parts of LA and throughout the country. Below are reasons this site should not be used as a landfill:

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- * Traffic on the west side is already congested to a point of near gridlock.
- * Vital Urban Environmental Balance improves air quality, protects ground water, raises water tables and counters green house effect.
- * Public Law 98-586 prohibits landfill sites on park land areas not in operation by September 1984.

Los Angeles should be the leader in recycling as we head into the 21st century, not the destroyer of a beautiful county and city by polluting and burying itself in trash.

Your truly,

Mary Fenster

cc
Yaroslauskys
Braude

P26

P26

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6.

Joe C. Jones
2511 La Condesa Drive
Los Angeles, Ca. 90048
Home Phone (310)472-5605

RECEIVED
MAY - 2 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

May 01, 1996

Mr. Mike Mohajer
Los Angeles Department of Public Work
Department of Waste Management
900 South Fremont Avenue
Alhambra, Ca. 91803

Dear Mr. Mohajer,

I was in attendance at the Department's Public Hearing, held at the University Synagogue on April 11th., to learn about the results of the Long Range planning effort to cope with the disposal of Los Angeles' Solid Waste in the year 2000 and beyond. I was extremely disappointed with what I heard. Rather than an innovative and far reaching Plan for the next Century, the explanation of the Department's Plan was nothing but a rehash of the same old tired, bureaucratic proposals of the past 20 years, to continue to use local canyons, adjacent to residential neighborhoods, as "garbage dumps". An Plan that advocates the opening of pristine canyons such as Rustic, Sullivan and Mission Canyons, in the year 2006, is ludicrous. It completely ignores the decisions of the past and the environmental realities of the next Century. I found the Department's discussion of their Plan totally lacking in vision and any attempt to adapt emerging technologies to the management of solid waste disposal over the next 10 years and beyond.

The Objectives of the Department's Long Range Plan need to be recast to aggressively seek out and exploit new technologies and creative approaches to the solution of the waste disposal problems facing Los Angeles. Challenging goals should be set in the areas of Source Reduction, Recycling and Disposal of any resulting residue in areas far removed from residential communities and human habitat. Failure to fully explore innovative concepts as "too expensive", as indicated in the Public Hearing, is a bureaucratic "cop out".

Los Angeles is a center of advanced technology and creative enterprise. That is what has made it great. An aggressive effort to tap the wide variety of talents that are available in the local public and private sector should allow us to meet our goals in the next Century without continuing to use our local canyons as "Garbage Dumps". I urge the Department to give it a try.

Sincerely,



cc: Councilman Marvin Braude
Supervisor Zev Yaroslavsky
Loretta Ditlow, BHHA

P27.1

P27.1

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6.

P27.2

P27.2

Please refer to Topical Response #2.

RECEIVED

MAY - 2 1996 May 1, 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

Dear Mr. Mohajer:

As a concerned citizen of Los Angeles and resident of the Mission Rustic Sullivan canyon area, I strongly oppose another attempt to use our canyons as landfill. For years, this area has been used by hundreds of thousands of people from all over Los Angeles and the surrounding communities for recreation.

Landfills are obsolete. Many operational recycling firms are handling solid waste (some recycle 100%) in parts of LA and throughout the country. Below are reasons this site should not be used as a landfill:

- Earthquake epicenter located at southern/ lower end proposed landfill. USGS map, Quaternary Faults and 1978-84 Seismicity of the LA Region.
- Traffic on the west side is already congested to a point of near gridlock.
- Vital Urban Environmental Balance improves air Quality, protects ground water, raises water tables and counters green house effect.
- Public Law 98-506 prohibits landfill sites on park land areas not in operation by September 1984.

Los Angeles should be the leader in recycling as we head into the 21st century, not the destroyer of a beautiful county and city by polluting and burying itself in trash.

Your truly,

Ben W. J. [Signature]
Salvatore C. [Signature]

cc
Yaroslawsky
Braude

P28

P28

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6.

ERD

Peggy McCain
2334 Westridge Road
Los Angeles, CA 90048
(310)471-6434

April 28, 1996

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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.
 - * 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
Varoslavsky
Braude

enclures: 8

P29

P29

The Mission-Rustic-Sullivan canyons site has been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6.

Stephen L. Kanne and Claudia M. Kanne
2664 Cordelia Road
Los Angeles, California 90049
(310) 476-8259

April 29, 1996

Mr. Mike Mohajer
Los Angeles Department of Public Works
Department of Waste Management
900 South Fremont Avenue
Alhambra, California 91803

Dear Mr. Mohajer:

We live in Los Angeles in the Mission Rustic-Sullivan Canyon area. We strenuously oppose the proposal to use this canyon as a landfill in view of the fact that we and many other citizens have used this area over the years for hiking and other recreational purposes. Moreover, we fear for the quality of our air and water as well as for local flora and fauna if this site were developed as a landfill.

In addition to the above, we view landfills as entirely out of date with the times and needs of the community. Instead, we suggest that the City dispose of refuse by recycling firms which are currently (and successfully) handling waste solids throughout the country.

We urge you to abandon this plan to deposit trash in one of the most recreationally significant parts of our beautiful City.

Very truly yours,

Stephen L. Kanne

Claudia M. Kanne
Stephen L. Kanne and Claudia M. Kanne

cc: Supervisor Zev Yaroslavsky
Councilperson Marvin Braude

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MAY 06 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

P30

P30

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Please refer to Topical Response #6.

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MAY 06 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

May 1, 1996

Dear Mr. Mohajer:

As a concerned citizen of Los Angeles and resident of the Mission Rustic Sullivan canyon area, I strongly oppose another attempt to use our canyons as landfill. For years, this area has been used by hundreds of thousands of people from all over Los Angeles and the surrounding communities for recreation.

Landfills are obsolete. Many operational recycling firms are handling solid waste (some recycle 100%) in parts of LA and throughout the country. Below are reasons this site should not be used as a landfill:

- Earthquake epicenter located at southern/ lower end proposed landfill. USGS map, Quaternary Faults and 1978-84 Seismicity of the LA Region.
- Traffic on the west side is already congested to a point of near gridlock.
- Vital Urban Environmental Balance improves air Quality, protects ground water, raises water tables and counters green house effect.
- Public Law 98-506 prohibits landfill sites on park land areas not in operation by September 1984.

Los Angeles should be the leader in recycling as we head into the 21st century, not the destroyer of a beautiful county and city by polluting and burying itself in trash.

Your truly,

Robert J. Aragona

c/c
Yaroslawsky
Braude

P31

P31

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Please refer to Topical Response #6.

DS

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MAY 06 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

Joan McCraw
2265 Westridge Road
Los Angeles, CA 90049

30 April 1996

Mr. Mike Mohajer
Los Angeles Department of Public Works
Department of Waste Management
900 South Fremont Avenue
Alhambra, CA 91803

Dear Mr. Mohajer:

As a concerned citizen of Los Angeles and resident of the Mission Rustic-Sullivan canyon area, I strongly oppose another attempt to use our canyons as a landfill. For years, this area has been used by hundreds of thousands of people from all over Los Angeles and the surrounding communities for recreation.

Landfills are obsolete. Many operational recycling firms are handling solid waste (some recycle 100%) in parts of LA and throughout the country. Below are reasons this site should not be used as a landfill:

- Health/Fire Hazard
- Deteriorated Air Quality
- Noise/Traffic Pollution

Los Angeles should be the leader in recycling as we head into the 21st century, not the destroyer of a beautiful county and city by polluting and burying itself in trash.

Sincerely,



JSM:lp

cc: Marvin Braude
Zev Yaroslavsky

P32

P32

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Please refer to Topical Response #6.

Post & Civilian Order
 3747 Wilshire Blvd
 Van Nuys, CA 91414

S/M MIKE MOHAJED

Landfills are outdated. Please
 can we find
 another
 alternative!!
 regarding Elsenore
 Canyon in Santa
 Clarita Valley. I'd like to think of the
 future clean and natural
 resources. Thank you for your
 response.

PAUL HOGARTH ONE BA, Churn, 10/11/87, San Jose, CA 95128
 From "The Midwestern Shore" © 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025

IBA

HARRY TRUMAN
 USA 30c

ATTN: MIKE MOHAJED
 L.A. County Public
 Works
 900 S. Fremont
 Alhambra, CA-91803

P33 This comment is acknowledged.

68D
D-1

Kim & Douglas J. Hauck
3624 Mandeville Canyon Road
Los Angeles, CA 90049

Mr. Mike Mohajer
Los Angeles Department of Public Works
PO Box 1460
Alhambra, CA 91802-1460

April 30, 1988

Dear Mr. Mohajer:

As lifelong residents of Los Angeles and current residents in Mandeville Canyon, we are opposed to using our canyon area as landfills.

Our canyons are beautiful and many people come to enjoy the scenery and trails for hiking, biking and a good sense of healthful living. The views are gorgeous and the peacefulness serves us all well. The area is not abused and the residents participate in the upkeep.

There are a million reasons why the areas of Rustic-Sullivan and Mission Canyons should not be used for landfills. The reasons are pretty obvious so I feel no need to list them. I am sure with all the resources the county has, surely there are far more appropriate site areas with less population and wildlife.

Please do what you can to support our community in our plea. It would be truly appreciated.

Sincerely,


Kim & Doug Hauck

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MAY 13 1988

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL DIVISION

P34

P34

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Please refer to Topical Response #6..

13891 Cranston Avenue
Sylmar, CA 91342
May 8, 1986

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

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MAY 16 1986

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

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:

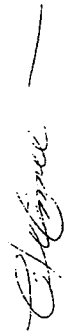
- 1) The Olive View Neighborhood Watch, representing over 1000
homeowners in the Sylmar - North San Fernando Valley area, voted at
its April 8, 1986 meeting to oppose both the creation of a Sanitary
Landfill at Elsmere Canyon and any extension of use at Lopez Canyon.
- 2) Neither the DEIR nor the ND adequately address such issues as
the "liveability 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 NOT addressed
anywhere.

Sincerely yours,



P35.1

P35.1 This comment is acknowledged.

P35.2

P35.2 This comment pertains to an issue of environmental impact.
Please refer to the Final Environmental Impact Report, Part
I, Comments and Responses.

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 Ketz
Councilman Hal Berson
Councilman Richard Alacon
City of Santa Clarita
US Forest Service, Angeles National Forest

110
Sul
Sul

Sulcific Enterprises

Public Utility District of Southern California

15001-10th Street, W.L. 2511
Los Angeles, CA 90044-1011
213-244-2300

Billy Ware
Director, Regional Government Affairs
June 4, 1996

Messrs. M. Michael Mohajer and
David M. Smith
Los Angeles County Department
of Public Works
Post Office Box 1460
Alhambra, California 91802-1460

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JUN - 6 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROTECTION

**Re: Comments of Southern California Gas Company to Los Angeles County Draft
Countywide Siting Element, Draft Countywide Integrated Waste Management
Summary Plan, and Related Environmental Documents**

Gentlemen:

We have reviewed the referenced documents and are concerned that one of the sites being considered in the Draft Countywide Siting Element ("DCSE") for a new landfill includes Sullivan Canyon. While Sullivan Canyon may meet certain geologic requirements for a Class III landfill (DCSE at 6-3), we would like to apprise you in this letter of other factors which make that Canyon undesirable for such a use.

As you may know, much of Sullivan Canyon is owned by Southern California Gas Company ("SoCalGas"). SoCalGas maintains and operates a 30-inch diameter and a 34-inch diameter high-pressure natural gas pipeline under the floor of Sullivan Canyon. These pipelines, which are designated as lines 407 and 3003, are an integral part of the Company's pipeline system. Lines 407 and 3003 form the primary link between abundant natural gas supplies in the northern county and the southwest portion of the system.

The federal Pipeline Safety Act and California Public Utilities Commission order 112E would require that these pipelines be moved if the Canyon was converted to use as a landfill. The County would, of course, be required to pay the relocation costs. Due to the terrain and the limited number of streets in the area, relocation of these pipelines would be difficult and expensive. As the proposed landfill is currently configured, we estimate that at least 20 miles of pipe would need to be relocated. Direct construction costs for the relocation would be, roughly, \$1.5 million per mile.

In addition, residents of the area likely would be concerned if high-pressure pipelines needed to be relocated in the narrow neighborhood streets that are near Sullivan Canyon. Responding to these concerns could stall the project and add to its cost.

PO Box 1249
Los Angeles, CA 90044-1249
FAX 213-244-2304

P36

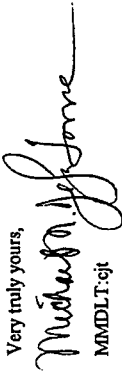
P36

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Please refer to Topical Response #6.

Please consider these factors in assessing the suitability of Sullivan Canyon for a new landfill.
We will be pleased to discuss any of the foregoing information with you or provide any
additional details that you require.

Very truly yours,



MMDLT:cjt

SULLCOM1.DOC



HACIENDA HEIGHTS IMPROVEMENTS ASSOCIATION, INC.

POST OFFICE BOX 5235 • HACIENDA HEIGHTS, CA 91745 (818) 330-HHIA

June 10, 1996

Mr. Harry W. Stone, Director
Los Angeles County Department of Public Works
900 S. Fremont Street
Alhambra, CA 91803-5100

Dear Mr. Stone:

In addition to comments provided by members of HHIA's Environmental Committee at the public hearing on April 10, 1996 in Whittier, we are forwarding the enclosed written comments on the Countywide Siting Element and Draft Environmental Impact Report for the CSE. As neighbors to the Puente Hills Landfill, HHIA has accumulated a great deal of experience regarding urban landfills and the siting process associated with these landfills, as well as alternatives which are available. We offer the following general comments, along with the specific comments on the documents, which are enclosed:

1. The waste generation totals seem to be inconsistent with the intent of AB 939

AB 939 prescribes calculation of waste generation starting in 1990 and allowing for population and economic growth in the region to estimate future year requirements. The methodology used in the CSE seems to overpredict the amount of waste generation, by starting with 1995 as the base year. We believe accuracy in predictions of landfill needs is highly important to avoid unnecessary permitting and development costs, along with attendant public concern, as well as to maintain Public Works credibility in accurate predictions of landfill shortfalls.

P37.1 See Topical Response #9.

2. The CSE over-emphasizes in-County landfilling versus other viable technologies

Environmentally safe transformation technologies and out-of-County disposal using waste-by-rail are given very little discussion in the CSE as means of reducing the County's reliance on urban landfilling. Several transformation technologies are being employed commercially in other parts of the world which were not even mentioned in the CSE. These technologies, all of which can meet the AB939 categories covered in this document, should be described in terms of environmental impacts and mitigation to the same extent that landfilling is, to assure that the CSE will avoid prejudicing County planners against these technologies.

P37.2 See Topical Responses #2, #3, #5 and #14.

3. The public participation process described in the CSE has not worked for County Sanitation Districts' landfills.

HHLA and members of our community attempted during the Puente Hills expansion proceedings to point out environmental impacts on our community and suggest alternatives that would allow expansion while reducing those impacts. We believe active participation by the County, as described in the CSE, would have resulted in a review process which would have more equitably resolved these concerns and resulted in a reasonable landfill expansion, without need to rely on litigation. It is not clear, particularly with Public Works commitment in the CSE to expedite approval for Sanitation Districts' future landfill permits, that this process will work as described. It is apparent that DPW may have limited resources to ensure that the public participation process described in the CSE is actually implemented. The CSE should describe what agency, if DPW and Regional Planning are unable to do so, will referee the public process for these future projects to guarantee that it is fairly administered in accordance with CEQA requirements and the description in the CSE.

P37.3 See Topical Responses #11 and #12.

4. Alternative scenarios should be evaluated in the CSE environmental review

The DEIR should consider planning scenarios which involve substantial use of remote landfills, such as East Carbon, La Paz, and Franconia, as well as landfills proposed in California. Changes in environmental impacts within the County associated with each of these scenarios should be described. These environmental evaluations should be performed without elimination of alternatives for economic reasons, as required by CEQA. Since the CSE will serve a major role in guiding future solid waste planning for the whole county, it must be complete in its evaluation of whole-County issues. Individual DEIR's for individual projects are unable to properly address the whole-County issues.

P37.4 See Topical Responses #1, #8 and #9.

5. Many of the mitigation measures cited in the CSE Environmental Analysis have not been successful at Puente Hills

The environmental analysis describes many mitigations which, while they sound good in environmental documents, have not provided good results in actual applications at Puente Hills and other landfills. These include cement-bentonite barriers, bird wires, odor mitigation, dust control, and habitat impacts.

P37.5 See Topical Response #8.

Mr. Harry W. Stone
June 10, 1996
Page Three

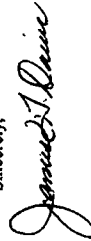
6. The CSE landfill plan places a disproportionate share of burdens on residents of unincorporated areas.

While the cities will be generating most of the waste, the disposal plan places most of its emphasis on new landfills or landfill expansions in unincorporated areas. The Puente Hills Landfill, near my home, will be receiving nearly forty per cent of the total solid waste generated in the County after year 2000. We believe this creates a situation where the cities have little incentive to reduce their waste volume or participate actively in disposal decisions. We suggest the development of a host fee structure, or some form of tipping fee structure which would credit city participation in aggressive diversion programs, would help equalize these burdens. Some of these funds could be used, for example, to support research or pilot programs that would provide disposal technologies that could be used within cities which do not have suitable landfill sites. Additional suggestions are offered below.

Based on the experiences of our association and our residents, we strongly urge Public Works to provide strong leadership in effective solid waste planning and in providing leadership independent of the Sanitation Districts to assure that all alternatives will be fairly evaluated. We support innovative financial structures associated with use of existing landfills in unincorporated areas that will encourage reduced dependence on these facilities. These include mandatory weight- or volume-based tipping fee structures for all jurisdictions and waste companies using these facilities, tipping fee surcharges to promote recycling, as in Alameda County, and commitment of all unincorporated area wastes to non-urban landfill disposal, with any additional costs resulting from such commitment collected in host fees for use of all county permitted facilities. We believe implementation of such innovative strategies will lessen the burdens our residents and others who live near existing or proposed urban landfills will have to endure.

I would be pleased to have an opportunity to discuss any of these comments or proposals with you personally. Please contact me at (818) 961-7048.

Sincerely,



James T. Davis
President

P37.6 Please refer to Topical Response #1 for further discussion.

P37.6

200

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JUN 11 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

June 6, 1996

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

Dear Mr. Smith:

Enclosed letter is a copy of a letter sent to Michael Mohajer on April 23, 1996. On May 21, 1996 I received a response to from Mr. Harry Stone, Director and Mr. Donald Wolfe, Deputy Director on behalf of Mr. Mohajer. This response did not specifically address the types of incentives that I spoke of that are needed to reduce the generation of waste. I plan on sending Mr. Stone another letter requesting specific information on the nature and types of current and proposed incentives and their respective goals.

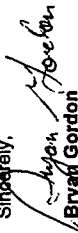
Yesterday I received a call from Innovative Research Management on behalf of the Environmental Programs Division of the L. A. County Dept. of Public Works. They asked that I submit to you a copy of my written testimony (see attached letter) to you in regards to the County's plans to site landfills within Los Angeles County. In particular, I am strongly opposed to the siting of landfills in Sullivan/Rustic and Mission Canyons within the Santa Mountains National Recreation Area. The destruction of these areas will greatly undermine the quality of life for all citizens in the surrounding areas.

I am opposed to the use of the remaining open spaces in and around Los Angeles as landfills, particularly when there does not exist any incentive for homeowners or renters to reduce their generation of waste.

I would welcome the challenge to partner with the County to develop incentives that reduce the generation of waste.

Thank you.

Sincerely,


Bryan Gordon
11622 Idaho Ave., # 7
Los Angeles, CA 90025
310-826-8016

gmc

P38.1

P38.1

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

See Topical Response #6.

.copy.

April 23, 1996

Mr. Michael Mottajer
Los Angeles County Department of Public Works
900 South Fremont Ave.
Alhambra, CA 91803

Dear Mr. Mottajer:

On April 11, 1996 I attended a public hearing held in the West Los Angeles community of Brentwood. This hearing was part of the siting element for the Los Angeles County Waste Management Summary Plan.

After reading the Summary Plan Fact Sheet I noticed that nothing was mentioned in the Purpose and Goals that will create incentives to reduce waste. Unless the Plan specifically addresses the issue of creating incentives for the public to reduce waste, the plan avoids resolving the problem at the generation point. Incentives really work.

The County and City of Los Angeles must partner together to create incentives that reduce the public's generation of waste or the amount of trash that is generated by the public will continue to grow as certainly as suburban sprawl in Los Angeles. The Summary Plan in its current form will promote the more costly "end of pipe solution" and will be ineffective at reducing the source of the waste in the first place.

Currently, the costs for waste disposal are levied in the form of taxes to the citizens of Los Angeles City and County. From a taxpayer's point of view the total costs for dealing with the waste problem will continue to grow as will the tax that pays for handling the waste. Until the City and the County have the courage to demand sacrifices from the citizens of Los Angeles County for dealing with the waste problem before its created, the County will continue to demand sacrifices from the communities for "end of pipe" solutions such as siting landfills in and around our communities remaining open spaces.

Solutions? How about a ban on yard waste, such as is enforced in several other states? There are many creative ideas that can be generated by simply asking the question: **What is the best way the County of L.A. can create an incentive for people to continuously reduce their waste rather than having to continuously ask them to site landfills in their neighborhoods and remaining open spaces?** I would be willing to work with the County to develop such incentives!

The Summary Plan must have as its prime objective, the incentive to reduce the volume of waste created or it will continue to pass along the increasing costs of waste management and will not promote a sustainable quality of life in Los Angeles County.

Respectfully,

Bryan Gordon
11822 Idaho Ave., # 7
Los Angeles, CA 90025
310-828-8016

cc: Richard Riordan, Mayor
The Los Angeles County Board of Supervisors
Senator Barbara Boxer, Committee on Environment and Public Works

printed on recycled paper

P38.2

P38.2

This comment relates to the Los Angeles County Countywide Integrated Waste Management Summary Plan. Please refer to Volume III, Response to Comments Regarding Summary Plan.



Mountains National Recreation Area
P.O. Box 1460
Alhambra, California 91802

June 10, 1996

RECEIVED
JUN 12 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

David Smith
P. O. Box 1460
Alhambra, California 91802

Dear Mr. Smith:

This letter is in response to a request from the consulting firm of Bill Hussey & Associates that we confirm in writing to you our Association's position on the possible opening of Mission, Rustic, Sullivan canyons as landfills.

I believe the article on page 3 of our current Newsletter entitled "Mission Canyon, a Landfill Target Again?" clearly conveys the position of our organization.

Tarzana Property Owners Association represents families in approximately 700 homes in Tarzana. These members are wholeheartedly in support of the position stated.

Very truly yours,

Greg G. Johnson, President
Board of Directors

GN:et
encl. (1)

DEBRA ALLEN, CLERK, N. CALIFORNIA

P39

P39

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

See Topical Response #6.

LAKE VIEW TERRACE IMPROVEMENT ASSOCIATION

P.O. BOX 224, SUNLAND, CA 91061

14 June 1996

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

RECEIVED
JUN 17 1996
DEPARTMENT OF PUBLIC WORKS
COUNTY OF LOS ANGELES

RE: The Preliminary Draft Los Angeles Countywide Siting Element (CSE), January 1996 and the Draft Environmental Impact Report Los Angeles County Countywide Siting Element (DEIR), SCH No. 95011048, January 1996

Dear Mr. Smith:

The Lake View Terrace Improvement Association (LVTIA) has reviewed the CSE and the accompanying DEIR. We object to the County including Lopez Canyon Sanitary Landfill and Sunshine Canyon Landfill in the CSE. The City Council voted on 13 December 1995 to close Lopez Canyon Sanitary Landfill as of 1 July 1996. The County proposes in the CSE that the remaining capacity after July 1996 will be made available for disposal within 15 years. The surrounding community will not allow this to happen.

Furthermore, the City Council voted in 1989 to phase out disposal operations at Sunshine Canyon Landfill due to noncompliance with the conditions of the zoning variance. The County assumes that the capacity for the proposed Sunshine Canyon expansion will be available within 15 years. BFI has not been a good neighbor, and therefore should not receive the required permits to develop this site.

Thank you for allowing the LVTIA to comment on the Countywide Siting Element DEIR.

Sincerely,



Cile Borman
Co-President

P40

P40

Please refer to Topical Response #6.

SERVING MORE THAN 12,000 RESIDENTS SINCE 1940
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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 Towstley Canyon
- Hacienda Heights Improvement Association
- Kearl Canyon Civic Association
- Members and Others Against the Dump
- North Valley Coalition
- Ridge Trail Park Trust
- Santa Clarita Citizens Transportation Association
- Santa Clarita Civic Association
- Santa Clarita Oak Conservancy
- Santa Clarita Organization for Planning the Environment
- Santa Clarita Valley Canyons Preservation Committee
- Santa Susana Mountain Park Association
- Save Our Skyline
- Save the Angeles Foundation
- Val Verde Civic Association

Founding Members:

- Ed Ayres
- Glenn Bailey
- Rona Berger
- Alan Cameron
- Frank Cox
- Mary Emmer
- Ann Johnston
- Vera Johnson
- Jill Kelle
- Margie McLean
- Arlene Mead
- Chip Meyer
- Mike Ormsby
- Karen Pearson
- Samuel Ramebeck
- Steve Ramebeck
- Rob Zepke
- Anna Zisk

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

Re: Countywide 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

P41.1

P41.1

The 1995 disposal quantity figures are based on the State approved Disposal Quantity Reporting system. The sources of data for 1990 are the data provided in each jurisdiction's SRRE in Los Angeles County and the March 28, 1991 Task Force Report to the California Integrated Waste Management Board (Appendix 4-A), which was prepared pursuant to Section 41791 of the PRC. Imports were not included in determining the waste generation projections, which were made using the State's approved Adjustment Methodology.

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

P41.1

P41.2

P41.2

Comment noted. The data used in the waste generation projections has been updated. The projections were made using the State's Adjustment Methodology and are consistent with State regulations and guidelines. Also, see Topical Response #8.

P41.3

P41.3

Comment noted. See response to previous comments. See Topical Response #8.

P41.4

P41.4

Comment noted. The CSE does take into account potential out-of-County disposal capacity. Chapter 9 discusses out-of-County facilities and the limitations of the out-of-County disposal option.

P41.5

David M. Smith
June 17, 1996
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

P41.5

P41.5

Comment noted. Chapter 2 of the Final Draft CSE includes policies to foster development of alternative disposal technologies. Also a section on alternative disposal technologies has been added to the CSE (Chapter 5) and on alternative diversion technologies to the Countywide Summary Plan. See the Countywide Summary Plan for more information. Note that under current State law, disposal does not include composting. Composting facilities are listed and discussed in each of the 88 cities and the County Non-Disposal Facility Element.

P41.6

P41.6

The CSE does not limit importation of solid waste into Los Angeles County nor does it limit exportation of solid waste to out-of- Los Angeles County facilities.

David M. Smith
June 17, 1996
Page 4.

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.

P41.6

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?

P 41.6a

P41.6a Each project, if it is to be developed, will have its own environmental and technical analyses/reports.

P41.6b

P41.6b Comment noted. The Summary Plan does not include the CSE.

P41.7

P41.7 The Task Force delegated the responsibility of reviewing and commenting on the CSE to its Plan Review Subcommittee. However, all Task Force members had access to the Preliminary Draft and Final CSE. The final decisions on the CSE were made by the Task Force.

David M. Smith
June 17, 1996
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.

P41.7a

P41.7a Please refer to the Final Environmental Impact Report, Volume I, Responses to Comments, for response to comments specific to the Draft EIR.

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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
June 17, 1996
Page 7.

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.

P41.7a (cont.)

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, Towasley, Mission-Rustic-Sullivan, and Lopez Canyons. If no private sector interests have initiated proposals regarding these

P41.8 P41.8 Comment noted.

P41.9 P41.9 Please refer to Topical Responses #1, #2, and #14.

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, Towsley Canyon, and Mission-Rustic-Sullivan Canyons were to become unavailable, the County would

P41.9

P41.10

P41.10 The CSE was prepared pursuant to State law. State law requires 15 years of disposal capacity for the residual solid waste that remains after recycling, composting, and other waste diversion activities. Disposal capacity is defined by State law as the capacity provided by landfills and transformation facilities.

P41.11

P41.11 Comment noted. See response P41.10 with the landfill.

P41.12

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 Redminster 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 "F" (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.

P41.12

P41.12 Please refer to Topical Responses #6 and #14.

P41.13

P41.13 Refer to response #41.10

P41.14

P41.14 Please refer to response #41.10. Also, the jurisdiction having local land use authority will make the ultimate determination regarding General Plan consistency and land use for a site for which a description has been provided in the CSE.

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 Council) 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 Plambeck
Lynne Plambeck PAK

Encl.

P41.15 Comment noted
P41.15

EPP

2153 Aroma Drive
West Covina, Ca. 91791
June 13, 1996

RECEIVED

JUN 17 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

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

Dear Sir:

This letter is to formally protest the Countywide Siting Element, the Summary Plan and the Draft Environmental Impact Report Los Angeles County Countywide Siting Element and to request revision of each so as to adequately inform the public of the alternatives that the County of Los Angeles could adopt. Waste disposal at landfills in Los Angeles County has had a history of adverse environmental consequences upon the properties that are adjacent or near to landfills. The above named documents, do not adequately inform the public what the history of problems are at landfills in Los Angeles County. Without such a history of the problems, a member of the public or decision maker who relies upon these documents to become informed is without a proper bases to make a good decision. California Environmental Quality Act (CEQA) requires that real alternatives be identified and the consequences of each be included in the report. How a landfill is designed can make a major difference upon what the neighbors of a landfill must endure once waste is deposited at such a landfill. Although baling of garbage in mentioned the lack of odors at landfills that only accept garbage that has been processed and squeezed into bales prior to placement in a landfill is not explained or even outlined in these plans or elements as published (January 1996). Also baled garbage does not produce leachate and as a result landfills that only accept baled garbage have not had groundwater pollution problems.

Specifically review of situations such as Newport, Oregon and Coeur D'Alene, Idaho as part of the EIR would give the public a proper background to evaluate alternatives. At Newport the dewatering of garbage by baling was adopted because the previous loose placement of waste, as is done in all Los Angeles County landfills, caused groundwater problems. At Coeur D'Alene, the problem with loose placement of waste was odors and gases in the old gravel pit where disposal was occurring. Today the pit has been filled with bales. The landfill is closed and the surface is now used for recreational facilities.

Wet garbage placement with compaction at the face of the landfill leads to environmental problems at a landfill and with the design of landfills to place only dry waste reduces significantly the possibility of future environmental problems such as odors and groundwater contamination. Therefore siting of landfills in Los Angeles County that only accept dewatered garbage should be the recommended policy in the EIR and the document should be revised to include the dewatering of garbage prior to placement in any landfill that will continue to operate or be sited in Los Angeles County.

Very truly yours,

Royall Brown
Royall Brown

P42.1

P42.1

The Final Draft CSE includes a new chapter - Chapter 5, Alternative Disposal Technologies - which discusses disposal alternatives to landfills. This chapter also includes discussions on methods to enhance existing disposal capacity, such as baling.

Also, please refer to Topical Response #2 for further discussion.

P42.2

P42.2

This comment is acknowledged.

TO : FROM :

PHONE NO. : 01814563593

JUN 17 1996 4:32PM P 1

3 pages DC

UPPER MANDEVILLE CANYON ASSOCIATION
P.O. Box 48945
Los Angeles, California 90049

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

June 17, 1996

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 Mandeville 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 CSEA, 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 Canyon Landfill provided it is found to be environmentally sound and technically feasible." Similar site-specific policies are stated for Elmer's Canyon,

P43.1 P43.1 These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

See Topical Response #6.

P43.2 P43.2 Please refer to Topical Responses #2 and #3.

UPPER MANDEVILLE CANYON ASSOCIATION

Towley Canyon, Blind Canyon, expansions of Antelope Valley and Lancaster Landfills, Chiquita Canyon Landfill, Puente Hills Landfill, Lopez Canyon Landfill and Sunshyne Landfill.

Why doesn't the CSE DEIR discuss or tabulate the suitability of not only Mission/Ruocco/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 exclusionary, what criteria are?

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 resource 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 (SPTable 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?

P43.3 The DEIR serves as a policy manual, not a specific development program. Each site, as they are proposed, must comply with all of the requirements of the CEQA. Also see Topical Response #2.
P43.4 Please refer to Topical Response #9.

P43.5- The discussion in the Draft EIR regarding potential impacts resulting from the adoption of the CSE is intended to address the general overall impacts that can logically be expected by virtue of the general characteristics of design, construction, etc., of the facilities identified in the CSE. This includes in-county as well as out-of-county facilities. Please refer to Topical Response #8 for further discussion.
P43.7

P43.8 The Summary Plan summarizes the types of programs planned in the SRRE's, HHWE's and NDFE's prepared by each city in Los Angeles County and the County (for unincorporated area). The CSE is not part of the Summary Plan.

P43.9 The CSE is not a revision of the Action Plan. The CSE was prepared in response to a state mandate to address the disposal capacity needs of Los Angeles County for a 15-year planning period. To identify sites that may be potentially suitable for new landfills which may assist in meeting the State mandate, the CSE draws in information from previous studies that evaluated the feasibility of over 100 sites throughout the County.

The referenced goal and corresponding policy provide a statement of support for the policies outlined in the CSE to address disposal capacity needs of Los Angeles County. The CSE, however, is a separate document which must be separately reviewed and approved by a majority of the cities in the County containing a majority of the incorporated population, and by the Los Angeles County Board of Supervisors.

P43.3

P43.4

P43.5

P43.6

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P43.8

P43.9

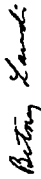
P43.8

P43.9

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 Lendis
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 bailers 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 evidenced 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.

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 whimsey 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.

P44.1

P44.1 This comment is acknowledged.

P44.2

P44.2

The CSE deals with disposal capacity issues only. Please refer to the Final Draft Los Angeles County Countywide Integrated Waste Management Summary Plan for discussion regarding diversion activities.

P44.3

P44.3

The Lopez Canyon Landfill has been deleted from further consideration in the Final Draft CSE. See Topical Response #6.

P44.4

P44.4

Recent changes in State law have restored the ability of jurisdictions to utilize approved green waste ADC programs without counting tonnages assigned to such use as disposal

P44.5	Please refer to Topical Response #2
P44.6	Comment noted.
P44.7	Please refer to Topical Response #9.
P44.8	Please refer to Topical Response #9.
P44.9	This comment is noted.
P44.10	Please refer to Topical Response #6 for discussion. The details of project specific discussions and mitigation measures are beyond the scope of this EIR for each facility as it is proposed
P44.11	The potential expansion of Lopez Canyon Landfill has been eliminated form further consideration in the Final Draft CSE.

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 L.A. 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 L.A. 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. Scintillation 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 RWQCB 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.

P44.11

P44.12

P44.12 Any potential new landfill or expansion of an existing landfill, as well as any potential new or expansion of an existing transformation facility that may be proposed in the future will be required to go through the CEQA process where these issues will be addressed. Concerns regarding the adequacy of enforcement by regulatory agencies are beyond the scope of this document and should be addressed to those agencies. Please refer to Topical Response #8 for further discussion.

P44.13

P44.13 Comment noted.

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

THE TERRACE HOMEOWNERS ASSOCIATION

12525 MOUNTAINGATE DRIVE
LOS ANGELES, CALIFORNIA 90049

June 14, 1996

Mr. Harry Stone
Director of Public Works
900 South Fremont Ave.
Alhambra, CA 91803

Dear Mr. Stone,

The purpose of this letter is to register the opposition felt by the twenty four homeowners that live at The Terrace toward the proposed Mission Canyon landfill.

We have attended many meetings and stated numerous, sound and reasonable objections to such a sight which include the impact on traffic, surrounding schools and churches, the environment, the health hazards and dangers related to methane gas and the ever present fire hazard with limited access roads for protection and escape.

Many people have spoken eloquently and passionately against this sight and for good reason. It is not right. The continued inclusion of Mission Canyon as a possible sight is beyond the scope of rational, responsible thinking. Let us put this issue to rest by removing Mission Canyon from any further consideration.

We thank you for your support in resolving this matter in the near future.

Yours truly,



M. Elaine Charlat
President

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JUN 18 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

P45

P45

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6 for further discussion.

**ULTRASYSTEMS
ENVIRONMENTAL
INCORPORATED**



Environmental Consultants

June 17, 1996

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

VIA FACSIMILE
& U.S. MAIL

RECEIVED

JUN 18 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

Re: Preliminary Draft Los Angeles County Countywide Siting Element, January 1996

The following information is submitted on behalf of Browning-Ferris Industries, Inc. (BFI) in response to the County of Los Angeles comment period on the Preliminary Draft Los Angeles County Countywide Siting Element (January 1996). This information provides updates regarding the following landfill facilities, owned and operated by BFI:

- (1) the approved Sunshine Canyon Landfill Extension, located in the County of Los Angeles, and
- (2) the proposed Sunshline Canyon Landfill, located in the City of Los Angeles.

In connection with these landfill facilities, the information presented below is derived from the Draft Subsequent Environmental Impact Report (Draft SEIR), now in preparation by the City of Los Angeles for the proposed Sunshine Canyon Landfill in the City of Los Angeles.

Sunshine Canyon Landfill Extension (County of Los Angeles)/proposed Sunshline Canyon Landfill (City of Los Angeles)

Page ES-11 should be changed to reflect that the ultimate City and County Sunshine Canyon Landfill projects could potentially provide for approximately 215 million tons of solid waste disposal capacity. This capacity is based upon the potential disposal capacity within the Sunshine Canyon area, and provides for adequate protection of the ridge line areas. This information was originally discussed within the DEIR, Volume I, prepared for the Sunshine Canyon Landfill Extension (April 1989).

Page 6-8 should read, "[t]he proposed project would ultimately consist of a lateral extension of the City landfill, utilizing side-slope areas, and provide for both a vertical and horizontal expansion of the approved landfill, located in the County of Los Angeles and the existing landfill, located in the City of Los Angeles. Combined, these areas would provide for approximately 75 million tons of solid waste disposal capacity, and would accept up to 11,000 tons of solid waste per day."

Page 6-13 should reflect the same changes made on Page ES-11.

P46.1

P46.1 thru P46.6

Please refer to the Final Draft CSE, Chapter 7, Table 7-10 and page 174 of this Appendix D for response.

P46.2

P46.3

20461 Crown Valley Parkway, Suite 140 • Mission Viejo, California 92691
(714) 867-8888 • FAX: (714) 867-8890 • (RKY) 948-EIRS

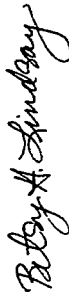
David Smith
County of Los Angeles

June 17, 1996
Page 2

- ▶ Page 6.32 referencing an anticipated site life of 22 years for the City/County landfill (75 million tons) in Sunshine Canyon. However, under expansion options, the ultimate City/County landfill could potentially provide for a 215 million ton landfill facility. This facility could provide for an anticipated site life of 62.65 years, with an average disposal capacity of 11,000 tons daily/312 operating days per year.
- ▶ Page 6.33, Figure 6.12 should be replaced with an accurate figure that reflects the ultimate combined City/County landfill (approximate 215 million ton landfill), located within Sunshine Canyon.
- ▶ Page 7.3, Table 7-2, regarding information in the column "Comments," should be revised as follows: the County Board of Supervisors granted CUP No. 86-312 on 11/30/93 instead of 10/21/93 for the expansion in the County unincorporated area. A project application was filed by BFI on 6/25/91 with the City of Los Angeles for a proposed expansion of the Sunshine Canyon Landfill facility, located within the City of Los Angeles. Currently, a Draft SEIR is under preparation, and is expected to be available for public review and comment in September 1996.

Should you have any questions regarding this information, please give me a call at your earliest convenience.

Sincerely,



Betsy Lindsay
Principal

cc: James T. Aidukas, Browning-Ferris Industries of California, Inc.
4650 CalWMP Smith Ltr

P46.4

P46.5

P46.6

COMMENTS
 COUNTYWIDE SITING ELEMENT
 HHA LANDFILL COMMITTEE

Prepared by: Jeff Yain, Chair

Waste Generation/Disposal Volumes

1. Municipal Solid Waste should be tabulated separately from inert waste. Diversion to landfills should only be acceptable to the extent that the material actually reduces previously used quantities of natural materials.
2. January 1, 1990 figures should be based on actual average landfill disposal plus disposal in transformation facilities plus documented diversion by recyclers. No quantity should be simply assumed to have been diverted without substantiation (facility names, quantities, types of material, etc.). All imports should be deleted.
3. 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 L. A. County. There is no reason to assume L. A. County's share of state growth will remain the same. In fact, Los Angeles County has trended below many other state areas.
4. There is no basis for adding 25% 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 per cent since 1989 and economic indicators have gone down. Therefore, the 1995 generation rate should be about 4 % lower than 1990. Even if none of the disposal volume was from imports, the MSW generation rate for the County in 1995 should be about 43,200 tpd rather than 51,000 tpd. The landfill disposal rate, considering actual transformation, should be 30,700 tpd. If 10 % of the total waste stream is committed to transformation, the 1995 landfill rate would drop to 28,100 tpd.
5. Future projections should be based on these data, with possible corrections to reflect state-wide growth at a recorded or assumed ratio (lower) of L. A. County to state.
6. The residential generation rate should vary with population only.
7. 10 % transformation or out-of-county disposal should be reflected in landfill need projections.
8. The growth rate from 1995 on should fall somewhere around 0.5 % per year for residential and 1.2 % per year for commercial, for a composite growth rate of around 0.9 % per year. Using this rate, MSW totals in 2000 will be 45,200 tpd, and landfill requirements will be 18,100 tpd, with 50% diversion and 10 % transformation.
9. Any solid waste material that continues to go into a landfill at any point should be considered within the above-derived landfill disposal volume.
10. AB 939 does not require the disposal sites to be in-county or even in-state. I suggest that scenario A be replaced with a scenario relying on East Carbon, La Paz, Franconia, and in-state truck haul facilities for the excess capacity requirements.

[Handwritten initials]

P47.1	P47.1	See Topical Response #9.
P47.2	P47.2	See Topical Response #9.
P47.3	P47.3	See Topical Response #9.
P47.4	P47.4	See Topical Response #9.
P47.5	P47.5	See Topical Response #9.
P47.6	P47.6	See Topical Response #9.
P47.7	P47.7	See Topical Response #9.
P47.8	P47.8	See Topical Response #9.
P47.9	P47.9	See Topical Response #9.
P47.10	P47.10	Refer to Chapter 4 of the CSE.

COMMENTS
 COUNTYWIDE SITING ELEMENT
 HILA LANDFILL COMMITTEE

1. Page ES-4-How can the county plan be described as protecting the health, welfare, and safety of ALL citizens, when most trash generation is from the cities and nearly all of the landfill related impacts and hazards are imposed on unincorporated area residents?

2. Page ES-6-How does one explain the fact that waste is being imported into the county when landfill capacity will be exhausted within 9 years, even without this importation, and no county-required program to export trash is being performed or described in this document?

Page ES-6-Why isn't the County taking any measures to preserve its limited landfill space by using remote sites and targeting goals that go beyond the 50% diversion rate?

3. Page ES-7-How can transformation simply be written off on the basis of cost infeasibility when alternatives are not allowed to be ruled out in CEQA matters solely on the basis of cost, and no properly developed cost studies to justify this conclusion are even provided? Why aren't any cost figures included for the long-term environmental liabilities of landfills, including gas seepage, liner failures, and other liabilities that have forced some jurisdictions to abandon landfilling and/or support landfill mining as a way to reduce these liabilities?

4. Page ES-7-Why isn't the CPUC encouragement of renewable technologies cited as a basis for pursuing transformation technologies?

Page ES-11-Why are sites included on this list still consistent with the 1988 Sanitation Districts' landfill plan when much has happened in the intervening 8 years that precludes use of some or all of them? How can this document bill itself as an up-to-date county siting element when it cannot and does not assess viability of any of these sites and does not include a discussion on a contingency plan to develop and use out-of-county 9or out-of-state) sites?

Page 1-1-If the county takes seriously its responsibility for "protecting the health, safety, and economic well-being of the County residents while continuing to provide an environmentally safe, efficient, and economic solid waste disposal system," why is it allowing itself to be led into disaster by the Sanitation Districts, who operate the Puente Hills Landfill, acknowledged by the State Water Resources Control Board Staff to be leaking leachate into ground water adjacent to the San Gabriel River? What areas of leadership independent of CSD's influence can Los Angeles County point to in this document, and how much of the total disposal volume does this County leadership account for?

P47.11 Comment noted. Please refer to Topical Response #1 and #8.

P47.12 See Topical Response #3.

P47.13 See Topical Responses #1, #3, and #14

P47.14 Closure and post closure mitigations are beyond the scope of this document. Please refer to Topical Response #14 for further discussion.

P47.15 See Topical Responses #2 and #14.

P47.16 See Topical Responses #1, #3, and #14

47.17 This comment is beyond the scope of the CSE.

COMMENTS
COUNTY-WIDE SITING ELEMENT
HHIA LANDFILL COMMITTEE

Prepared by: Jeff Yann, Chair
Page 1-3-40,000 tons per day represents less than a 10% reduction from 1990 disposal rates, which are the appropriate benchmark for AB 939 diversions. Limited population growth and economic downturn accounts for much of the decrease. How can the County be considered in compliance with its 1995 goals, particularly since very few County-wide programs are in place to generate a reduction?

Page 1-8-Why are there no host fees, or weight based tipping-fee structures, or fee surcharges for development of economical diversion incentives being imposed on cities who use landfills in unincorporated areas? This would both encourage diversion program development, and potentially conserve landfill space through alternatives to avoid higher disposal fees.

Page 1-9-How much of the transformation facility ash simply ends up in the Puente Hills Landfill? Provide more information on end use of diverted ash.

Page 1-10-What host fee does Los Angeles County charge for imported waste, and how are these funds being used to solve the "landfill Crisis" that Public Works' spokespersons are always talking about?

Page 2-2-How can the County both assist BFI in expediting the permitting and development of Elsmere and retain independence as the agency responsible for reviewing the adequacy of the environmental analysis? How can the County's advocacy for this site allow it to avoid conflict-of-interest in its role as permitting agency? Is this the explanation for why the County chose to use CSD as its consultant on CSD's expansion proposals for Puente Hills? What methods does the County propose to assure all of these proposals get an objective review if, in fact, it is working hand-in-hand with the project proponents?

Page 2-2-Why is it necessary for the County to advocate disposal by landfilling near unincorporated area residents on behalf of the 88 cities, who have their own responsibility to deal with their waste independently? Shouldn't the County be working on behalf of unincorporated area residents, who have no other representation, too? Why doesn't the County establish proper criteria to protect these residents, and permit only landfills that meet those criteria, instead of starting with the projected future landfills and establish criteria that will allow these landfills? Isn't it quite possible that such an approach might lead to a substantially different conclusion regarding the approach the County needs to take for future solid waste landfilling.

P47.18

P47.18 See Topical Response #9.

P47.19

P47.19 This comment relates to the Los Angeles County Countywide Integrated Waste Management Summary Plan. Please refer to Volume III, Response to Comments Regarding Summary Plan.

P47.20

P47.20 This comment is beyond the scope of the CSE.

P47.21

P47.21 Please refer to Topical Response #3 and #9.

P47.22

P47.22 Please refer to Topical Response #8.

P47.23

P47.23 See Topical Response #11.

COMMENTS
COUNTYWIDE SITING ELEMENT
HHIA LANDFILL COMMITTEE

Page 2-2-How can a landfill expansion like Puente Hills, which is already producing contaminants into ground water, causing odorless gases (with accompanying, odorless toxic and carcinogenic gases) to frequently drift into neighboring homes and school grounds, along with PM-10 contamination, noise, flooding, visual impacts and other negative impacts, be considered environmentally sound?

P47.24 See Topical Response #8.

Page 2-3-The Puente Hills expansion experience is already showing that 2,500 foot separation is not adequate to prevent unacceptable impacts from landfills and adjacent homes, let alone the 2,000 feet approved for ultimate implementation here. What steps is the County taking to assure that proper land use policies will be established to govern spacing and separation in this and other cases?

P47.25 See Topical Response #8.

Page 2-4-How will the County assure that public participation will be meaningful in landfill siting, particularly if the County is working with the proponents to expedite the permitting process? What public input from the extensive Puente Hills expansion process did the County use in determining that the approved 37 million ton expansion should be placed on the same footprint as the 75 million ton landfill expansion? What was the source of the input that was used in making that determination? Can the public believe that its input will be considered in future proceedings?

P47.26 See Topical Response #8.

Page 2-5-Why doesn't the County take a leadership role in remote disposal, given that CSD has not moved its program forward since 1988, by committing all unincorporated area trash, along with cities who wish to participate, to a program through cost sharing with disposal fees charged at landfills located in unincorporated areas? If such approach is not deemed feasible, how does the County propose to promote the utilization of remote sites? Is this consistent with playing a role in expediting landfill permits for BFI and CSD?

P47.27 See Topical Responses #3 and #5.

Page 2-7-What percentage of material brought to a landfill does the County believe can actually be diverted from disposal in the landfill, in some form or another?
Page 5-5-This discussion on public participation is very enlightening. Why do the County processes for landfill expansions not follow this process? Why are no negotiations conducted in matters where, as noted, the public understands the pros and cons, and offers effective site-specific suggestions to reduce landfill impacts? Why is no attempt made to "engage in discussions to reach a mutual goal that can best serve the entire community." Why, for example, was there no meaningful dialogue between the parties involved in the Puente Hills Landfill expansion and no independent (from CSD) evaluation performed by the County to learn which side was being truthful? Why, instead, did the County allow this situation to degrade into successful lawsuits on the part of the community, when the issues could have been, and, in fact, could still be successfully resolved through meaningful two-way discussions without such lawsuits? How can we gain any assurance, in light of these past practices, that this section is anything more than good sounding words on a piece of paper?

P47.28 See Topical Response #11.
Site specific mitigation is beyond the scope of the CSE.

COMMENTS
 DRAFT ENVIRONMENTAL IMPACT REPORT
 COUNTYWIDE SITING ELEMENT
 HHA LANDFILL COMMITTEE

Page 2-13-Does the waste-to-energy technology meet AQMD's NOx criteria for power plants of 0.1 pound/MWh? Why aren't there descriptions of technologies that do meet these criteria. Why is this section so heavily biased toward landfill operations?

Page 2-15-Are these operations typical of all landfills or just CSD landfills? How many landfill operators contributed to this section?

Page 2-18-Why are cement-bentonite barriers proposed when experience with leaking leachate and gases, as noted by the SWRCB Staff, has shown these barriers to become ineffective with the passage of time? How can Public Works consider such landfills acceptable next to drinkable ground water?

Page 2-23-How many (percentage) of incoming loads are checked for hazardous waste? Based on these findings, how many tons of hazardous waste are dumped illegally at L. A. County landfills each year?

Page 2-24-Why are there such frequent odors in the Hacienda Heights area, even with the Landfill 2,500-3,000 feet away? What will happen when it moves to the County permitted distance? Why aren't these things mentioned in this document? How can the County provide assurances to the residents of Hacienda Heights and other communities that these effects can be mitigated, when experience has been to the contrary?

Page 2-30-If these measures to prevent dust emissions are successful, why was there such an increase in dust in Hacienda Heights after the CSD began operations 2,000 feet from the community?

Page 2-31-How many gulls typically mill around the trash heap at Puente Hills on a fall or winter day? If the bird wires are successful, why are there upwards of 1,000-2,000 gulls near the working face? Why doesn't CSD even bother to move the wires from day to day? Why is there no mention of ravens, which have become prominent raiders of the nearby habitat since drawn to the area by the PH Landfill?

Page 4-3-Why would an earthquake fault map from 1971 be used in this document when so many significant earthquakes have happened since then? Is the intent to avoid the presence of blind thrust faults which substantially increase the unknown seismic hazard for landfills anywhere in southern California? How would landfill slopes be affected by peak ground accelerations registered in the 1987 Whittier Earthquake or the 1992 Ridge earthquake? Puente Hills did not experience these peak ground motions, so it is not an adequate answer to describe the Whittier Experience at that landfill. How can DPW justify the threat of major landfill slope failures due to seismic motion from unknown faults within the basin?

P47.29

P47.29 See Topical Response #1 and #14. Also refer to Chapter 5 of the final CSE

P47.30

P47.30 This comment is acknowledged.

P47.31

P47.31 The CSE serves as a policy manual rather than a specific development tool. Please refer to Topical Response #8.

P47.32

P47.32 This comment is beyond the scope of the CSE.

P47.33

P47.33 The CSE provides a description of the areas and strategies that may be used to address the State
 P47.34 mandates for adequate transformation or disposal
 P47.35 capacity during a 15 year planning period. The CS serves as a policy manual rather than a specific development program. As such, this EIR is not intended to provide detailed information on impacts and mitigation measures for the siting of the solid waste disposal/transformation facilities listed. Please refer to Topical Response #8 for further discussion.

P47.34

P47.35

COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
COUNTYWIDE SITING ELEMENT
HHIA LANDFILL COMMITTEE

Page 4-3-The Whittier Heights Fault, which underlies the Puente Hills Landfill, is frequently shown on maps depicting the seismic hazards in the San Gabriel Valley, as extending many miles west of the landfill site? Why is this fault not depicted on this map. Where is the fault that generated the 1987 Whittier Earthquake? Where is the fault that generated the Northridge Earthquake in relation to Sunshine Canyon, Elsmere Canyon, Chiquita Canyon, or Towsley Canyon?

P47.36 See Topical Response #8.

P47.36

Page 4-4-Why are M5.0 earthquakes on the San Jacinto Fault, which is located in San Bernardino County, described in this document, but M5.0 earthquakes which occurred very close to proposed landfill sites are not mentioned? Wouldn't these faults pose a far greater risk to slope stability and liner damage for nearby landfills?

P47.37 See Topical Response #8.

P47.37

Page 4-5-Why isn't a man-made pile of trash considered a point source in the same way that a man-made pile of mine tailings? Does DPW believe this pollution is acceptable if its source is not classified as a point source?

P47.38 See Topical Response #8.

P47.38

Page 5-17-What measurements has the County made of PM-10 emissions directly downwind of an operating landfill to determine the concentration and area of influence above ambient levels? What level of increased health risk is associated with continuous exposure to these higher levels of PM-10? Shouldn't these effects be factored into decisions to locate landfills in close proximity to residences, particularly since many operations which produce dust may occur much closer to the homes than the landfill operations, themselves?

P47.39 See Topical Response #8.

P47.39

Page 5-27-With strong assertions by the staff of the State Water Resources Control Board that the Puente Hills Landfill has been leaking leachate to ground water for many years, wouldn't its proximity to this water source be of some interest to readers of this document? Why doesn't L. A. County establish criteria that would prevent the close proximity of landfills and drinking water?

P47.40 See Topical Response #8.

P47.40

Page 6-1-How can individual project EIR's, which, of necessity, include unavoidable significant impacts, evaluate the advisability of siting the facility in its proposed location, if the overall planning EIR fails to address these impacts on a regional basis? For example, why must the County put up with the residential and ground water impacts of urban landfills which may be unmitigatable, when the environmental tradeoffs of using remote landfills have never been evaluated? How can it be concluded that urban landfills are more positive or beneficial than remote landfills or greater use of environmentally benign transformation technologies if those evaluations are never made? Similarly, how can regional siting issues be evaluated if these comparisons are never made?

P47.41 See Topical Response #8.

P47.41

COMMENTS
 DRAFT ENVIRONMENTAL IMPACT REPORT
 COUNTYWIDE SITING ELEMENT
 HHIA LANDFILL COMMITTEE

Page 6-8-How does a siting element that requires trash disposal facilities to be sited adjacent to homes, schools, and drinking water sources protect the health, welfare, and safety of all County residents?

Page 6-8-With the Siting Element showing new and expanded landfill projects only, and almost all of those projects in unincorporated County area, why would any other jurisdiction even feel motivated to site such facilities? What assistance does this plan provide, other than guaranteeing that the County will sacrifice its unincorporated area residents to bear these burdens. Why isn't the "wealth" distributed more equitably on all County residents?

Page 6-8-How does the CSE promote remote disposal, when such disposal facilities are barely mentioned? Item 3 is certainly a sought-after beneficial effect for County residents, and this document should be revised to include a plan for implementing remote disposal.

Page 6-9-Why is Item 8 listed as a benefit of the CSE, since its implementation is not dependent on the CSE, and it is not described in the CSE in great detail?

Page 6-9-Some other jurisdictions allow private pickup trucks to dump loads for free at Materials Recovery Facilities. How does the CSE reduce the threat of illegal dumping when it advocates only landfilling, consistent with past practice in the County-a practice that has apparently not been successful in reducing illegal dumping? How much would tipping fees rise if residents who were willing to haul in their own trash could do so for free?

Page 6-9-How does the CSE improve transportation safety by requiring truck trips across the County to a few, large local facilities? Wouldn't safety be considerably improved by rail haul from localized collection areas and MRF's? Why doesn't the CSE evaluate such a system as an alternative to reduce safety impacts?

Page 6-9-Why haven't mechanisms to facilitate and encourage public involvement been implemented in the past? Doesn't the effectiveness of public participation increase when there is dialogue, sharing of ideas, working out problem areas in a participative manner? Was this ever done by either the Sanitation Districts or Public Works on Puente Hills? What is going to be done to improve this in the future? Why isn't this planning already in process to work out a reasonable 20 year expansion of Puente Hills, consistent with a reasonable share of County requirements and effective implementation of remote disposal, with an appropriate landfill footprint that buffers adjacent residents from expansion impacts?

P47.42 See Topical Response #8.

P47.43 See Topical Response #8.

P47.44 See Topical Response #3.

P47.45 Comment noted.

P47.46 This comment relates to the Los Angeles County Countywide Integrated Waste Management Summary Plan. Please refer to Volume III, Response to Comments Regarding Summary Plan.

P47.47 See Topical Response #8 and #11.

P47.48 See Topical Response #11.

COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
COUNTYWIDE SITING ELEMENT
HHIA LANDFILL COMMITTEE

Page 6-14-Why not simply prohibit landfills within a specified distance, in miles, from recharge basins or ground water reservoirs? Why take a chance when liner systems and other containment features are showing that they cannot provide protection throughout the life of the facility, and remote sites, which are not near large drinking water reservoirs, are available?

P47.49 See Topical Response #8.

P47.49

Page 6-15-When odorous gases are observed in neighborhoods adjacent to landfills, what assurances are there that non-odorous toxic or carcinogenic landfill gas components are not also present? Since landfill EIR's rarely acknowledge frequent occurrence of odors, how can residents verify that health effects analyses for harmful gases are adequate? Isn't it common to underestimate landfill gas seepage? How can such seepage be adequately evaluated or mitigated?

P47.50 See Topical Response #8.

P47.50

Page 6-16-Many loads brought to the landfill emit quantities of dust during unloading. What methods are used to control these emissions? Do water trucks spray the trash?

P47.51 See Topical Response #8.

P47.51

Page 6-19-Why is there no evaluation of differences in traffic impacts and emission effects which result from shipping wastes to one County facility by truck during the day versus collection and transportation by rail at night, or direct disposal at smaller facilities dispersed throughout the County? What is the difference in emissions and traffic caused by one train hauling 3,500 tons of trash across the County, versus trucks hauling 4,400 tons of trash plus recyclables from areas remote to the in-County landfill? Why haven't these alternatives been evaluated independently in this program EIR?

P47.52 See Topical Response #8.

P47.52

Page 6-19-Shouldn't the impacts caused by landfills on the relatively small amount of unique basin habitats that now remain be compared to relative loss of more abundant habitats in desert areas, or limited biological impacts of building transformation facilities in already industrialized areas? Wouldn't significant loss of valuable oak woodlands and coastal sage scrub, as well as natural streambed habitat, be significantly reduced by using non-urban landfill alternatives?

P47.53 See Topical Response #8.

P47.53

Page 6-21-Why isn't loss of hillstides and canyons, which may form a backdrop for a community, as well as the basis for community identity, considered a "significant effect on community aesthetics?" Do you disagree that these natural settings are important for communities, such that many communities have hillside development ordinances? Do you believe landfill development does not scar these aesthetics?

P47.54 See Topical Response #8.

P47.54

Page 6-22-How does landfill disposal, where the dumper has to pay tipping fees, reduce illegal dumping? If so, why is it still a problem?

P47.55 This comment is beyond the scope of the CSE.

P46.55

COMMENTS
COUNTY-WIDE SITING ELEMENT
HHJA LANDFILL COMMITTEE

Page 4-8: Where is the incinerator ash being disposed that is noted as being diverted (from landfills)?

Page 6-8-Do you agree that the approved landfill footprint for Puente Hills is only one of several that could have provided future flexibility? Do you agree with CSD that it did not result in a single environmental impact reduction inconsistent with what might be expected for reducing the expansion volume by 50%. What input from the public process did the County rely on to reach that determination? How much input independent of CSD was used?

Page 6-9-Recent studies show that waste-to-energy employing gasification technologies can provide effective means of implementing WTE at economical prices and in a way that can meet SCAQMD's stringent emissions criteria. Why doesn't the CSE even mention that this technology exists, let alone provide a technology description and evaluation? Is this because the CSD does not use this technology, which developed after its plants were built, and does not wish to acknowledge the existence of this competitive technology?

Page 6-9-Why is there such limited emphasis on transformation in a document that is purported to cover both transformation and landfilling? Is this because CSD is only interested in landfilling? Why doesn't the County provide independent leadership in describing and promoting environmentally superior technologies to landfilling?

Page 7-2-If the intent of the CSE is "to provide for the solid waste needs of the residents of the 88 cities in Los Angeles County and the County unincorporated communities," why are there no Reserved Landfill Sites or any other disposal sites in any of the 88 cities (note that Lopez Canyon is being closed), which produce almost all of the waste? How can this inequitable arrangement be considered fair to ALL county residents? What is the County doing to assure a more equitable distribution of responsibility for waste disposal?

Page 8-1-Given the adverse impacts that have resulted from urban landfills in the County, and the lack of responsibility shown by cities in developing real alternatives, why would the County prepare Section 8 to emphasize all of the negatives that might be associated with out-of-county disposal when these negative impacts, if present, will have limited effect on unincorporated areas compared to the negative impacts they currently suffer? How much money do Supervisors make from contributions that they feel such responsibility to CSD and others who promote these landfills, and so little responsibility to protect unincorporated area residents? This section should be expanded to emphasize the benefits to unincorporated area residents of eliminating unincorporated area landfills, or, at least, reserving capacity in them for force majeure situations. Why not allow cities to use them only if these cities have had unanticipated problems with remote disposal contracts?

P47.56

P47.56 This comment is beyond the scope of the CSE. See Topical Response #8.

P47.57

P47.57 This comment is beyond the scope of the CSE. See Topical Response #8.

P47.58

P47.58 See Topical Response #14. Also, refer to Chapter 5 of the final CSE.

P47.59

P47.59 See Topical Response #14. Also, refer to Chapter 5 of the final CSE.

P47.60

P47.60 These issues are beyond the scope of the document.

P47.61

P47.61 Please refer to Topical Response #3.

COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
COUNTYWIDE SITING ELEMENT
HHA LANDFILL COMMITTEE

Page 8-2-There are a multitude of ways to achieve the disposal requirements of AB 939. Some of these ways would include: use of remote landfills via truck or rail haul, regionalization of landfills around the county, requiring cities to develop disposal compacts for solid waste, and excluding or economically discouraging city wastes from disposal in County-permitted landfills, and increased use of local transformation facilities. How can these alternatives, or any others, be ignored in a programmatic environmental impact evaluation that will set the course for solid waste management in the County for the next 15 years and beyond? How can these regional impact evaluations be performed in project-specific EIR's, when they were not included in the program document? How can a planning document, that will be treated as a basis for future County solid waste planning to meet AB939, be considered complete and adequate without an evaluation of alternative ways of accomplishing these objectives?

Page 9-1-Why isn't a more detailed discussion provided on significance of permanent loss of the unique types of habitat found in canyons in the low hill systems in Los Angeles County and the cumulative impacts of multiple projects in areas of the County where current zoning and planning studies allow such development. Why aren't wildlife migration pathways discussed, since permanent closure of a few critical wildlife corridors, by direct loss, or degradation of canyons which form corridor reserves, can affect natural resources in large tracts of land which themselves are not directly affected by construction?

Page 9-1-Why doesn't this section address long term environmental damage caused by failed liner systems and leachate barriers, which have begun to exhibit evidence of leakage within ten years of their construction? Why isn't it mentioned in this section that some jurisdictions are banning landfills and/or mining contaminants out of landfills as their method of choice for eliminating liabilities from these long-term environmental effects? Wouldn't emphasis on landfills in remote areas or environmentally safe forms of transformation facilities significantly reduce these long-term liabilities? Wouldn't transformation and recycling of landfill contents both produce more energy, more recycling, more economic opportunities, and eliminate the potential for long-term harmful impacts, such as those occurring at Operating Industries, BKK, Azusa, and Puente Hills?

Page 9-1-Why aren't comparisons made which include the economic benefits of creating jobs and whole industries associated with more progressive solid waste technologies than simply landfilling? Why do these discussions only compare tip fee costs rather than look at the big picture of transportation savings, job growth in recycling and transformation technologies, and other economic benefits? Why is no support provided for the statement that the direct impacts of the CSE (which only evaluates landfilling in depth) on current and future generations would be beneficial?

P47.62

P47.62 No other alternatives were considered in the EIR because State Law requires the preparation of the CSE and there are no other feasible projects that can attain the objectives of the CSE. Please refer to Topical Response #8.

P47.63

P47.63 See Topical Response #8.

P47.64

P47.64 See Topical Responses #8 And #14.

P47.65

P47.65 See chapter 5 of the final CSE.

COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
COUNTYWIDE SITING ELEMENT
HHA LANDFILL COMMITTEE

Page 10-1-Why aren't creation of permanent odors, dust, and noise for residents, elimination of hundreds of acres of irreplaceable habitat, subjecting residents to escaping poisonous gases, and contamination of ground water considered significant, irreversible environmental changes? Wouldn't these changes be eliminated by use of remote landfills, which are not near residents or drinking water resources, or transformation facilities? Shouldn't this document properly describe those impacts and those differences to be considered complete?

Page 10-1-Why aren't these state-of-the-art mitigation systems working at the Puente Hills expansion? Does the County anticipate that the CSD and other landfill operators will do better in the future? If so, why aren't these systems in use now? Is it simply the case that they work better on paper than they do in practice?

Page 11-1-Isn't the statement that the CSE is not growth-inducing inconsistent with the conclusion that economic growth is a beneficial outcome of the CSE?

P47.66

P47.66 See Topical Response #8.

P47.67

P47.67 The EIR does not provide in-depth information on the impacts and mitigation measures of the siting of each landfill project identified in the CSE. The EIR serves as a policy manual not a specific development program. Each site, AS they are proposed, must comply with all of the requirements of the CEQA.

P47.68

P47.68 This comment is acknowledged.

June 18, 1996

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RECEIVED
JUN 20 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

VIA FACSIMILE
& U.S. MAIL

Re: Preliminary Draft Los Angeles County Countywide Siting Element, January 1996

The following information is submitted on behalf of Browning-Ferris Industries, Inc. (BFI) in response to the County of Los Angeles comment period on the Preliminary Draft Los Angeles County Countywide Siting Element (January 1996). This information provides updates regarding the Azusa Land Reclamation Facility, located in the County of Los Angeles. This landfill facility is owned and operated by BFI.

Azusa Land Reclamation Facility, Cities of Azusa/Ingledale

In response to the Los Angeles County Countywide Siting Element, Preliminary Draft (January 1996), the following additional information should be incorporated regarding the Azusa Land Reclamation Facility:

Currently, the landfill is divided into four landfill areas, designated A through D. Fill area A comprises approximately 80 acres, and began accepting solid waste in 1960. A small transition area, designated as fill area B, has historically accepted small volumes of waste materials, and currently accepts inert materials. Fill area C is 14 acres, and has been partially landfilled with solid waste, and currently accepts inert waste. The remainder of the landfill site, comprising future fill area D, is currently being excavated as part of the existing TMC sand and gravel mining operation, and currently accepts inert waste on portions of the area.

Since 1960, this landfill facility has operated under WDRs, issued by the LARWQCB, (Board Orders 60-22 and 86-59). In 1987, the Azusa Land Reclamation Company submitted to the LARWQCB a ROD, wherein requesting approval for expansion beyond the 80-acre existing area of waste disposal. On May 23, 1988, the LARWQCB denied WDRs for the proposed expansion into landfill areas B and C. As a result of that action, the Azusa Land Reclamation Company filed a revised ROWD on June 10, 1988, proposing an enhanced liner system for the expansion areas.

During November 1988, the LARWQCB adopted WDRs (Order No. 88-133) for the expansion area rescinding Board Orders 60-22 and 86-59. On December 28, 1988, the Main San Gabriel Basin Watermaster filed a petition with the SWRCB challenging the expansion, and requested review of Board Order No. 88-133. In response to the Watermaster, the SWRCB issued WDRs Order No. 89-17, on October 3, 1989. This order mandated that additional environmental control systems be

P48.1

This comment is acknowledged.

P48.2

This comment is acknowledged.

P48.3

This comment is acknowledged.

David M. Smith, Project Manager
County of Los Angeles

June 18, 1996
Page 2

placed in the expansion area (e.g. secondary drainage system, high-flow capacity geonet, 60-mil polyethylene liner and raising the elevation of the engineered foundation layer) for groundwater protection. Areas B and C were constructed, and solid waste disposal commenced, pursuant to the orders.

In subsequent litigation, the Court of Appeals directed the SWRCB to vacate Board Order No. 89-17, finding that certain requirements of CEQA needed to be addressed prior to landfill expansion. The SWRCB subsequently issued Order No. 91-01 on February 21, 1991, denying authorization to landfill solid waste in the expansion area, but authorized the discharge of solid waste in area A (80 acres only). Inert landfilling continues to be authorized in areas B, C and D. Future plans for the site include an expansion of the landfilling beyond the active 80 acres, to encompass the entire 302-acre site.

P48.4

This comment is acknowledged. Please refer to Chapter 3 of the Final Draft CSE for an updated discussion on the Azusa Land Reclamation Landfill.

Should you have any questions regarding this information, please give me a call at your earliest convenience.

Sincerely,



Betsy Lindsay
Principal

cc: Mark Clinker, Browning-Ferris Industries of California, Inc.
4630COWWPSmith2.Ltr

1/2/96
10/1/92
10/1/92
10/1/92

Bel Air Skycrest Property Owners Association

LOS ANGELES, CALIFORNIA 90049

PRESIDENT
Mr. Louis H. Novell 472-1301
1ST VICE PRESIDENT
Dr. Monell Fiddler 476-4194
2ND VICE PRESIDENT
Mrs. Conale Gregory 476-5315

SECRETARY
Mrs. Carolyn Kept 476-5676
TREASURER
Mr. William Friedland 472-4671

RECEIVED
JUN 26 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

June 19, 1996

Mr. Harry Stone
Director of Public Works
600 So. Fremont Ave.
Birmingham, Calif. 91803

Dear Mr. Stone:

As President of the Bel Air Skycrest Property Owners Association representing the 85 households which compose our community, I address this communication to you to register our unalterable opposition to the possibility of continuing to hold Mission, Rustic and Sullivan Canyons in the inventory of potential landfill (garbage dump) sites.

It boggles the mind that after all these years, two refusals by the City of Los Angeles and a mountain of evidence and testimony condemning the siting of a garbage dump anywhere in the Santa Monica Mountains, that the County would continue to try and breathe life into such an ill conceived, ill advised and odious project.

The record is clear. You need no recitation of the facts from us.

Mission, Sullivan and Rustic Canyons are NO PLACE for a garbage dump. The very act of considering such a siting in the midst of what may be the single most valuable public recreational asset available to the citizens of Los Angeles, next to the Pacific Ocean itself, is obscene.

We urge you in the strongest possible terms to once and for all abandon such a consideration.

Very truly yours,

Louis H. Novell

Louis H. Novell

LHN:gh

P49.1

P49.1

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6 for further discussion.

CSC

RECEIVED

Mr. Harry Stone, Director of Public Works - 1 1996 June 26, 1996
900 South Fremont Ave. DS/A
Alhambra, Calif. 91803
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Good Morning Sir:

I am a very concerned homeowner residing at 3084 Elvill Drive in the "BelAir Skycrest Homeowners" development.

Let me go on record as deeply opposing any attempt to list Mission Canyon and, or possible Rustic or Sullivan Canyons as any possible sites for Garbage dump areas period.

Any conditional use attempts to use these canyons as a sanitary landfill site(s) has been TWICE denied by the Los Angeles City Council in 1977 and in 1981. Today, some 15-19 years after above decisions came down, the IMPACT TODAY would be much, much greater do to the addition of thousands of residents now living in our area, and the educational-cultural corridor with its six schools, a church, a synagogue, a university and a new cultural center; on on the periphery of the proposed landfill.. THIS IS SIMPLE NOT ACCEPTABLE with these environs present.

Any mention of a landfill would certainly cause critical traffic congestion and problems resulting in more GRIDLOCK to an already overcrowded RESIDENTIAL AREA.

Our area in question was a previous site of a Landfill and that did incalculable damage to this day with: methane polluted area generating some 1500 cubic feet per minute pumped out from 15 wells placed in critical areas. I am told today, as a result of the earlier landfill that buried in that canyon there are five million, two hundred fifty thousand tons of refuse. And we are told that some 50 percent of the buried refuse is VOLATILE according to E.I.R.

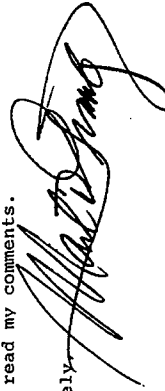
There are also legal reasons why you can not place another landfill in Mission Canyon, not the least of which is that the Sanitation District, when it first gained access to the canyon, agreed that the area would be turned over for parkland use. This is an "OPEN SPACE," on the Community plan.

These Canyons in question are deemed Special natural resource areas right in the middle of a densely populated city which is "park poor." We all need to protect environmentally-sensitive areas and THIS IS ONE OF THOSE AREAS; insure safe transportation of solid waste, and insure the structural and safety of any landfill.

Given the conditions in existence and the jeopardy to residents in our area and the institutions and the ensuing air pollution, water pollution and damage to the natural environment of the mountains, we do not believe you can meet either the necessary legal finding or any of your own criteria.

Thank you for taking the time to read my comments.

Sincerely,



MARK D. GRANBY
3084 Elvill Drive
Los Angeles, CA 90049

P50

P50

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6 for further discussion.

97-01-1996 11:06AM FROM
THE FEDERATION
 OF HILLSIDE AND CANYON ASSOCIATIONS, INC.
 102 BEL AIR ROAD, LOS ANGELES, CALIFORNIA 90077

TO 18184583593 P. 01

W.S.

TELECOPIER COVER SHEET

DATE:

TO:

9/1/96 TO FAX NUMBER 181-845-8353
David Smith - Manager

FROM:

Mrs. Patricia Bell Heurt, President,
 FEDERATION OF HILLSIDE AND CANYON
 ASSOCIATIONS, representing over 200,000 households in the
 Santa Monica Mountains. THE FEDERATION has been
 instrumental in many land use and environmental issues such as:
 the writing of the Mountain Fire Code, the Slope Density Formula
 for Los Angeles, and the Mulholland Scenic Parkway Specific
 Plan.

MESSAGE:

*Please advise date
 you will be submitting
 comments to County Board
 of Supervisors - Re: Landfill
 siting - Mission
 Canyon - Santa Monica
 Addition Oregon
 Understood it is scheduled
 for July 26th - Thank you
 Mrs. Patricia Heurt*

P51

P51

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6 for further discussion.

Total Number of Pages including Cover Sheet: 1
 Problems? Phone: (310) 472-0562 Fax: (310) 472-0953

TOTAL P. 01

Mr. and Mrs. Jimmy Ray
5144 Florida Drive
Los Angeles, California 90049

RECEIVED

JUL - 2 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Mr. Harry Stone, Director of Public Works
900 South Fremont Avenue
Alhambra, CA. 91803

June 26, 1996

Dear Mr. Stone,

We have been living on the corner of Mulholland Drive and Cordia Drive for the past five and a half years. We love the community that we live in very dearly. During the years we have been living here, we have seen a lot of changes in the community. Increase in traffic, additional schools and school fairs, additions to existing schools, etc. What all this means is that the neighborhood that we live in is a very desirable place that everybody enjoys to be in or around of it. There are always children playing in the school yards, and people walking their pets. There is always a birthday or other kind of a party going on in one of the streets in our neighborhood. We wish to keep it being like this for as long as this place exists.

What bothers us is the news that we heard about a spectre of a garbage dump in Mission Canyon and possibly in Rustic or Sullivan Canyons. How can this even be possible? As we have learned, fifteen to nineteen years ago in the years 1977 and 1981 there was a request by the County Sanitation District for a landfill in Mission Canyon. As their request was denied due to environmental studies and public hearings, they are now once again considering Mission Canyon as a possible landfill. Since their previous failure many years back, many new residents have joined the community. Many schools have opened up with many new students attending them. Thousands of new people are in our community that weren't there 15 years ago. It is absurd that there is even a consideration of such a project for this beautiful family oriented neighborhood. Instead of turning Mission Canyon into a *parkland*, (the only thing that this area lacks), as promised by the Sanitation District when it first gained access to the canyon, they are considering it for a landfill site like it was a long time ago. As a result of that earlier landfill, buried in that canyon today, there are 5,250,000 tons of refuse, which is considered 50% volatile by the E.I.R. This danger is acknowledged by the fact that, *by court order*, there are at least 45 permanent probes and explosives meters that measure methane gas in and around Mission Canyon. This is a very scary fact.

Nonetheless, there are also legal reasons, by the determinations of the City Council, why the plan for another landfill in Mission Canyon should be disregarded. Those and many other legal prohibitions, including lawsuits for inverse condemnation in loss of value to

homes and institutions, should be consulted by yourself with the Los Angeles City Attorney.

"The objectives of the siting criteria are to protect the public health and safety of our natural resources. Protect the residents, protect air, surface water and groundwater quality. Protect environmentally-sensitive areas. Insure safe transportation of solid waste. Insure the structural stability and safety of the landfill, and protect the social and economical well-being of the community." You tell us, given the conditions in existence and the harm to residents, institutions, schools and students in the area resulting from pollution of air, water, and the natural environment, it is not our belief that you can meet neither the necessary legal findings nor any justification for the use of Mission Canyon as a landfill.

We thank you for understanding the pain and anger we and our neighbors are experiencing due to this horrible decision of the Public Works Commission to even consider testimony as to whether or not to list Mission, Rustic, and Sullivan Canyons as potential garbage dump sites. Please sympathize with us and let us keep our neighborhood the family neighborhood that it is, and a place for our children and grandchildren to always enjoy the beautiful surroundings around us.

Sincerely yours,

THE HAY FAMILY

P52

P52

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6 for further discussion.

Stanley Klein
2226 The Terrace
Los Angeles, CA 90049

July 1, 1986

Mr. Harry Stone, Director of Public Works
900 South Fremont Ave.
Alhambra, Calif. 91803

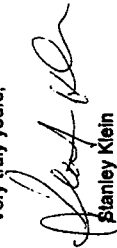
Dear Mr. Stone:

I am writing you regarding my strong objection to the proposed Mission Canyon Landfill. Mission Canyon was previously the site of a landfill; and that activity did incalculable harm. That first landfill polluted the area with volatile methane. Today and every day, some 1500 cubic per minute is being pumped out of 15 wells placed in critical areas. The methane has caused numerous fires, and has resulted in the abandonment of property on the perimeter judged to be unsafe.

The Mission Canyon area has critical traffic problems, often resulting in gridlock on major commuting corridors along Sepulveda Boulevard, Mulholland Drive and the San Diego Freeway.

We urge you not to consider a Landfill in Mission Canyon!

Very truly yours,



Stanley Klein

P53

P53

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Please refer to Topical Response #6 for further discussion.

JEROME J. BERCHIN
ATTORNEY AND COUNSELOR AT LAW

3034 ELVILL DRIVE
LOS ANGELES, CALIFORNIA 90049
310 . 472-4846
310 . 472-5103
FAX 310 . 472-5103

July 4, 1996

Mr. Harry Stone, Director of Public Works
900 South Fremont Ave
Alhambra, California 91803

Re: Mission Canyon

Dear Mr. Stone:

I have been a resident of Bel Air Skycrest for thirty years. I resided in Bel Air Skycrest during the period that litigation was ongoing 15-19 years ago. During this period, the request by the County Sanitation District for a conditional use permit to utilize Mission Canyon as a sanitary landfill was twice denied overwhelmingly by the Los Angeles City Council.

I find it incredible that the County Sanitation District is giving any consideration to whether it should list Mission Canyon in the County inventory as a potential garbage dump site.

I am sure that you need not be reminded that the previous denials of the requests of the County Sanitation District for a conditional use permit relative to Mission Canyon were based on extensive environmental studies which revealed an overwhelming adverse impact on the affected communities. The City Council further found that from a legal standpoint, it could not allow dumping of garbage in Mission Canyon.

The impact on this community today would be far greater than it was when the City Council rendered its decisions 15-19 years ago due to the tremendous increase in the population of the area as well as the conversion of the area into an educational-cultural corridor with six schools, a church, a synagogue, a university and a

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JUL - 9 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

JEROME J. BERCHIN
ATTORNEY AND COUNSELOR AT LAW

July 4, 1996
Page 2

cultural center on the periphery of the proposed landfill.

In addition to the foregoing, the Mission Canyon area has critical traffic problems in that the streets very often cannot accommodate the traffic, resulting in gridlock along Sepulveda Blvd., Mullholland Drive and the San Diego Freeway. Additional traffic which would be generated by a landfill, would adversely impact thousands of commuters between the Westside, the Valley and Downtown.

You are well aware that Mission Canyon was previously the site of a landfill which has caused incalculable and irreparable harm. It polluted the area with volatile methane, which even today and every day, some 1500 cubic feet per minute is being pumped out from 15 wells placed in critical areas. The methane gas has caused numerous fires and because of the methane gas, property on the perimeter has been adjudged unsafe and has been abandoned.

The previous garbage dump presently contains 5,250,000 tons of refuse, 50% of which, is volatile, according to the E.I.R.. To demonstrate the concern of the court relative to the existence of methane gas, the court ordered at least 45 permanent probes and explosimeters that measure the methane in and around Mission Canyon. The probes are located in Bel Air Skycrest and in the surrounding communities where I reside. I observe that constant monitoring is ongoing to detect off-site migration of methane gas. In the past there have been fires due to the ignition of the methane. On one occasion, the fire caused by the ignition of the methane gas was so intense, that the fire department, which is located less than a half a mile away could not stop the blaze. As a result, the fire burned across Mission Canyon, burned open areas surrounding Mountaingate, jumped Mandeville Canyon, and was not stopped until it reached Malibu.

It should be obvious to you that Mission Canyon is not an appropriate site for a future landfill, based solely on what I have stated above. However, in addition, from a

JEROME J. BERCHIN
ATTORNEY AND COUNSELOR AT LAW

July 4, 1996
Page 3

legal viewpoint, you cannot place another landfill in Mission Canyon, for, not the least of which is that the Sanitation District, when it first gained access to the canyon, agreed that the area would be turned over for parkland. Mission Canyon is "open space" on the community plan. It is suggested that you consult with the Los Angeles City Attorney to learn of a whole litany of other legal prohibitions, including but not limited to lawsuits for inverse condemnation for loss of value to homes and institutions.

Mission, Sullivan and Rustic Canyons are special natural resources located right in the middle of a densely populated city that is "park poor". These environmental gems are extensively used by thousands from all over the city, as well as by the residents of the area and should be preserved and cherished and not violated and polluted.

For the foregoing reasons, I urge that you give strong consideration to the removal of Mission Canyon, Sullivan Canyon and Rustic Canyon from the County inventory as potential landfill (garbage dump) sites.

Very truly yours,


Jerome J. Berchin

JJB/jb
cc: Louis Nevell

P54 P54

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6 for further discussion.

June 27, 1996

Mr. Harry Stone
Director of Public Works
900 South Fremont Avenue
Alhambra, CA 91803

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JUL - 9 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Dear Mr. Stone:

I am writing to state my adamant opposition to the Los Angeles County Sanitation District proposal for conditional use of Mission Canyon, Rustic Canyon or Sullivan Canyon as a Los Angeles County public landfill. I join with Los Angeles County Supervisor Zev Yaroslavsky and the Los Angeles City Council, which has twice voted overwhelmingly to oppose the use of these canyons as a landfill site.

Your own criteria for opening a landfill states your objectives are "to protect the public health and safety," "protect residents, protect air," "protect environmentally-sensitive areas," and "protect the social and economic well-being of the community." Given such standards, it goes against all reason and is a direct violation of your stated objectives to propose yet another landfill at Mission Canyon or the other two canyons, and I am totally against it.

My opposition is based on several factors. First, there have been extensive public hearings as well thorough environmental studies which clearly state the overpowering impact such a landfill would have on the area and which resulted in the City Council's determination legal findings could not be made to allow dumping trash and garbage. Now, nearly twenty years after those decisions, the consequences would be even greater. Not only are there thousands of additional residents in the area, Mission Canyon and its environs is now an educational-cultural corridor with six schools, a university, church, synagogue and cultural center on the periphery of the proposed landfill. In addition, the LACO Sanitation District agreed to turn the area over as a "parkland" and Mission Canyon is designated an "open space" on the Community Plan. The Los Angeles City Attorney's office can cite other legal impediments, which include numerous pending lawsuits and legal prohibitions.

Second, Mission Canyon has already been the site of a landfill and it has done terrible harm. It polluted the area with volatile methane gas. Now approximately 1,500 cubic feet per minute is being pumped out of fifteen wells placed in various areas at the site. There have been numerous fires caused by the methane. Property has been abandoned on the perimeter of the landfill because it was judged to be too dangerous. There are 5,250,000 tons of refuse in the landfill, 50% of which is volatile, according to an environmental impact report. There is a court order mandating at least 45 permanent probes and explosives meters at the site to monitor the methane gas caused by the

P55

P55

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Please refer to Topical Response #6 for further discussion.

extant landfill at Mission Canyon. The probes are located on developments off of Mullholland, Bel Air Knolls, Bel Air Skycrest and Mountaingate. Any vehicle in the area could be the cause of an explosion and fire. A downed power pole caused a fire in 1980 which was fed by brush and seeping methane. The intensity of the fire was so great the nearby, local fire company could not contain it and, before it was controlled, had burned across Mission Canyon, open areas around Mountaingate, jumped to Mandeville Canyon and reached Malibu. Methane generated fires have burned grass of the Mountaingate golf course and erupted in the rough below fairways there.

Third, Mission Canyon has critical traffic problems which is routinely manifested by gridlock along Sepulveda Boulevard, Mullholland Drive and the San Diego Freeway. Allowing the landfill would generate additional traffic and would adversely affect thousands of daily commuters between the Westside, the San Fernando Valley and Downtown Los Angeles.

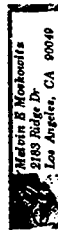
Fourth, the Bel Air Crest and Mountaingate communities have only one ingress and egress, Sepulveda Boulevard, for travel as well as for disaster evacuation. Mountaingate Drive, for example, is the only entrance to more than 300 homes and is also approximately 100 feet from the entrance to Mission Canyon. With the opening of the Skirball Cultural Center and the soon-to-be-opened Getty Museum there is going to be a huge increase in car travel to the area as well as many more tour and school buses. Sepulveda thus becomes a trap for residents of those two communities with yet more additional traffic that would be caused by landfill activities.

Finally, Mission Canyon, Rustic Canyon and Sullivan Canyon are an interrelated, natural resource in the middle of one of the most highly populated areas in America. The canyons are used extensively by thousands of people from all over the county and cities in the area in addition to the recreational use made by local residents. Such a natural resource should be cherished, preserved and enhanced, not destroyed and polluted or made into a landfill.

There is no question opening a landfill at Mission, Rustic or Sullivan Canyons will cause harm and will jeopardize residents and public institutions in the areas because of air pollution, fire hazard, nearly insurmountable traffic problems, safety issues related to already high traffic volume and the destruction of the natural environment of the area, all of which violates your own standards for choosing a landfill site. It also does not appear you meet any of the existing legal findings, not to mention additional legal consequences that will result if you persist in efforts to open another landfill in this area.

Therefore, I request you reconsider your proposal and I would appreciate your response to my letter.

Yours truly,



Walter P. Fleisher

P.O. Box 7111
7445 Sepulveda Blvd.
Van Nuys, CA 91410 USA
Telephone: 818/786-3317
Telefax: 818/786-5766

July 3, 1996

Mr. Harry Stone
Director of Public Works
900 South Fremont Ave.
Alhambra, CA. 91803

RECEIVED

JUL - 9 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Ref: Mission Canyon Landfill

Dear Mr. Stone,

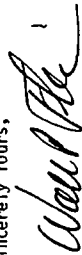
My family and I reside at 3046 Corda Drive in Bel Air Skycrest.

In 1977 and 1981 Mission Canyon was denied to be used as a landfill by the City Council of Los Angeles. The reason at that time was that the earlier landfill generated a lot of methane, the traffic in the area was very intense and the reopening of the landfill would cause a lot of harm and inconvenience to the homeowners and to the students in the schools along Mulholland Drive.

In the meanwhile a number of new schools and the Skirball Museum have been added to the area and the traffic has almost doubled, especially along Mulholland Drive, causing lots of traffic jams. The addition to the area of a number of garbage trucks would really cause tremendous damage to the area and slow down the traffic substantially more creating loads of bottlenecks.

For all the above reasons, my wife and I suggest that you abandon the idea of trying to place additional garbage facilities in and around our community.

Sincerely Yours,



Walter P. Fleisher

P56

P56

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6 for further discussion.

A

PROMONTORY HOMES ASSOCIATION

JULY 11, 1996

MR. HARRY STONE
DIRECTOR OF PUBLIC WORKS
900 SOUTH FRENCH AVENUE
ALHAMBRA CA 91803

RECEIVED

JUL 15 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

SUBJECT: A LANDFILL IN MISSION CANYON

Dear Sir:

I am writing you this letter to oppose the conditional use to utilize Mission Canyon as a sanitary landfill by the County Sanitation District. This opposition is due to the following health and safety reasons:

1. The Mission Canyon area has critical traffic problems, often resulting in gridlock on major commuting corridors along Sepulveda Blvd., Mollholland Drive and the San Diego Freeway. Additional traffic generated by a landfill would impact thousands of commuters between the Westside and the Valley and Downtown.
2. Sepulveda Blvd. is a trap for two major communities, Bel Air Crest and Mountaingate. Both of these areas have only one exit for daily travel or disaster evacuation. Mountaingate Drive, the only entrance to over 300 homes is approximately 110 feet from the entrance to Mission Canyon. Additional traffic generated by the opening of the Skirball Cultural Center and the Getty Museum will not only increase car travel in the area, but multiply tour buses and school buses as well.
3. Mission Canyon was previously the site of a landfill; and that activity did incalculable harm. That first landfill polluted the area with volatile methane. Today and everyday, some 1500 cubic feet per minute is being pumped out of 15 wells placed in critical areas. The methane has caused numerous fires, and has resulted in the abandonment of property on the perimeter judged to be unsafe.
4. The request by the County Sanitation District for a conditional use to utilize Mission Canyon as a sanitary landfill has been twice denied overwhelmingly by the Los Angeles City Council, first in 1977 and again in 1981. Those denials came after extensive public hearings and exhaustive environmental studies revealing the overwhelming impact on the area, and resulting in the City Council's determination that legal findings could not be made to allow the dumping of garbage in Mission Canyon.

(1)

P57

P57

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Please refer to Topical Response #6 for further discussion.

5. Today, 15 to 19 years after those decisions came down, the impact would be significantly greater. In addition to thousands of additional residents, Mission Canyon and all its environs have become an educational-cultural corridor with six schools, a church, a synagogue, a university and a cultural center on the periphery of the proposed landfill.
6. As a result of that earlier landfill, buried in that canyon today, there are 5,250,000 tons of refuse. Fifty percent of it according to E.I.R. is volatiles. This danger is acknowledged by the fact that -by court order- there are at least 45 permanent probes and explosimeters that measure the methane in and around Mission Canyon. These probes are located on developments off of Mullholland, Bel Air Knolls and Bel Air Skycrest, as well as in Mountaingate. They require monitoring so any off-site migration of methane will be detected and investigated. The movement of countless additional vehicles into the area would only increase the danger of explosion and fire set off by a spark.
7. There are also legal reasons why you cannot place another landfill in Mission Canyon, not the least of which is that the Sanitation District, when it first gained access to the Canyon, agreed that the area would be turned over for parkland. Mission Canyon is "Open Space" on the community plan. We suggest that you consult with the Los Angeles City Attorney for a whole litany of other legal prohibitions, including lawsuits for inverse condemnation in loss of value to homes and institutions.
8. Mission, Sullivan and Rustic Canyons are all of a piece. A special natural resource smack in the middle of a densely populated city that is "park poor". These environmental gems - extensively used by thousands from all over the city, as well as the residents of the area should be cherished, not violated and polluted.

On behalf of my fellow residents and the public that traverse Mission Canyon, we urge you to discontinue the plan to utilize Mission Canyon as a landfill.

THANK YOU AND BEST REGARDS.

PROMONTORY HOME ASSOCIATION

MEHDI MOTAMENI
Vice-President



Mr. & Mrs. Jed M. Cohen
16419 Sloan Drive
Los Angeles, CA 90049

July 12, 1996

RECEIVED

JUL 15 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROTECTION DIVISION

Mr. Harry Stone
Director of Public Works
900 South Fremont Avenue
Alhambra, CA 91803

Dear Mr. Stone:

It is with deep concern and conviction that we are writing to you to oppose the possibility of using Mission Canyon, Rustic Canyon or Sullivan Canyon as garbage dumps.

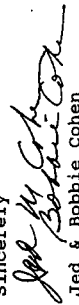
It is our understanding that this was resolved in 1977 and 1981 with a determination by the City Council of the overwhelming negative impact such a landfill would have on the area. As a result of previous landfill use, Mission Canyon and surrounding areas have suffered pollution from volatile methane gas, fires, and reduced property values.

Since 1981 the area has increased in population with the addition of private schools and religious and cultural centers. Critical traffic problems already exist and would only be magnified by the opening of a landfill site.

It is our understanding that among the objectives of the siting criteria are to "protect the public health and safety and our natural resources. Protect the residents, protect air, surface water & ground water quality. Protect environmentally-sensitive areas. Insure safe transportation of solid waste. Insure the structural stability and safety of the landfill, and protect the social and economic well-being of the community."

It is clear that the above criteria cannot be met by opening Mission Canyon as a landfill site.

Sincerely



Jed & Bobbie Cohen

P58

P58

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6 for further discussion.



From the desk of
Mission Movement
Date:

14

JULY 11, 1996

MR. HARRY STONE
DIRECTOR OF PUBLIC WORKS
200 SOUTH FREMONT AVENUE
ALHAMBRA CA 91003

SUBJECT: A LANDFILL IN MISSION CANYON

RECEIVED

JUL 15 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Dear Sir:

I am writing you this letter to oppose the conditional use to utilize Mission Canyon as a sanitary landfill by the County Sanitation District. This opposition is due to the following health and safety reasons:

P59

P59

1. The Mission Canyon area has critical traffic problems, often resulting in gridlock on major commuting corridors along Sepulveda Blvd., Mollholland Drive and the San Diego Freeway. Additional traffic generated by a landfill would impact thousands of commuters between the Westside and the Valley and Downtown.

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

See Topical Response #6.

2. Sepulveda Blvd. is a trap for two major communities, Bel Air Crest and Mountaingate. Both of these areas have only one exit for daily travel or disaster evacuation. Mountaingate Drive, the only entrance to over 300 homes is approximately 110 feet from the entrance to Mission Canyon. Additional traffic generated by the opening of the Skirball Cultural Center and the Getty Museum will not only increase car travel in the area, but multiply tour buses and school buses as well.

3. Mission Canyon was previously the site of a landfill; and that activity did incalculable harm. That first landfill polluted the area with volatile methane. Today and everyday, some 1500 cubic feet per minute is being pumped out of 15 wells placed in critical areas. The methane has caused numerous fires, and has resulted in the abandonment of property on the perimeter judged to be unsafe.


4. The request by the County Sanitation District for a conditional use to utilize Mission Canyon as a sanitary landfill has been twice denied overwhelmingly by the Los Angeles City Council, first in 1977 and again in 1981. Those denials came after extensive public hearings and exhaustive environmental studies revealing the overwhelming impact on the area, and resulting in the City Council's determination that legal findings could not be made to allow the dumping of garbage in Mission Canyon.

(1)

5. Today, 15 to 19 years after those decisions came down, the impact would be significantly greater. In addition to thousands of additional residents, Mission Canyon and all its environs have become an educational-cultural corridor with six schools, a church, a synagogue, a university and a cultural center on the periphery of the proposed landfill.
6. As a result of that earlier landfill, buried in that canyon today, there are 5,250,000 tons of refuse. Fifty percent of it according to E.I.R. is volatile. This danger is acknowledged by the fact that -by court order- there are at least 45 permanent probes and explosimeters that measure the methane in and around Mission Canyon. These probes are located on developments off of Mullholland, Bel Air Knolls and Bel Air Skycrest, as well as in Mountaingate. They require monitoring so any off-site migration of methane will be detected and investigated. The movement of countless additional vehicles into the area would only increase the danger of explosion and fire set off by a spark.
7. There are also legal reasons why you cannot place another landfill in Mission Canyon, not the least of which is that the Sanitation District, when it first gained access to the Canyon, agreed that the area would be turned over for parking. Mission Canyon is "Open Space" on the community plan. We suggest that you consult with the Los Angeles City Attorney for a whole litany of other legal prohibitions, including lawsuits for inverse condemnation in loss of value to homes and institutions.
8. Mission, Sullivan and Rustic Canyons are all of a piece. A special natural resource smack in the middle of a densely populated city that is "park poor". These environmental gems - extensively used by thousands from all over the city, as well as the residents of the area should be cherished, not violated and polluted.

On behalf of my fellow residents and the public that traverse Mission Canyon, we urge you to discontinue the plan to utilize Mission Canyon as a landfill.

THANK YOU AND BEST REGARDS.


MEHDI MOTAMENI
12520 Promontory Road
Los Angeles CA 90049

Peter R. Calabrese
16434 Sloan Drive
Los Angeles, CA. 90049

July 9, 1996

Mr. Harry Stone, Director of Public Works
900 South Fremont Avenue
Alhambra, CA. 91803

Dear Mr. Stone:

I am writing you concerning of the subject of the possible garbage dump that is being proposed for the environmentally sensitive site of the Mission Canyon open space.

I'm sure that you are familiar with all the historical, legal, ecological, safety, practical and humane arguments against the reopening of this site that have been brought out in numerous public forums held on the subject and that will be restated in numerous letters of this type which, I'm confident, you will be receiving in the imminent future. Hopefully, the repetition of these points will not dull your senses to the very real logic behind them. They make sense. They articulate the extremely negative impact a decision to reopen the Mission Canyon site will have, not only on the thousands of taxpayers, landowners and business people who live and work in the area, but also on the school children, religious worshippers, museum and cultural center visitors and commuters who pass through this beautiful area by the thousands on a daily basis.

I'm confident too that the fact that this proposal has been defeated twice before, in times when its effect would have been considerably less onerous in its environmental, safety and financial implications for the area and its residents, will also not be lost on you and your department.

In light of the above, I would like to voice my opposition as a new land owner in the area. I bought my house at the above address in January of this year. My wife and I put our life savings into our "dream house". Optimistic and hopeful that it would be a suitable place for us to raise the family which we are now trying to start. The area is safe, stable and well maintained. The view is spectacular and the constant breeze that comes off the canyon onto our property which borders it, is clean and refreshing. The concept of its use as a garbage dump that you are proposing for this land, which we viewed as such a blessing in our lives, is nothing short of traumatic. First, and most importantly, we will be unwilling to raise our children in such a potentially hazardous environment that has in the past been the source of fires, gas leaks and pollution. We will also surely lose thousands and thousands of dollars on our lifetime investment. Add to this the daily inconvenience of living in an area where traffic volume will escalate beyond what its already overtaxed roads can possibly tolerate, and we can vividly see our dream turning into a nightmare.

I'm sure that my story is only one of many that will cause other residents and business people of the area to fight as vigorously as we can to make sure that this travesty does not occur. With our collective resources, voices and votes, we will oppose this proposal with every means we can muster.

RECEIVED
JUL - 9 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

P60


P60

These canyons have been removed from the document due to the designation of the area as a part of the Santa Monica Mountains National Recreation Area which is a unit of the National Park System. Existing Federal law prohibits the siting of new landfills within the boundary of any unit of the National Park System.

Please refer to Topical Response #6 for further discussion.

Mr. Stone, surely your mandate as Director of Public Works does not include doing your job at the expense of the public welfare. The projections we have heard about the needs of the future pale in comparison to the realities of the detrimental effects a decision to open a site in Mission Canyon will have on the present. I sincerely hope that your department will display the intelligence and creativity needed to come up with a more inventive and positive plan for the future than the old, tired, knee jerk solution to this problem that is currently on the table.

Very sincerely,



Peter B. Calabrese
PC/ndg

cc: George Hedges, Esq.
Hon. Richard Reardon - via Facsimile
Hon. Zev Yaroslavsky - via Facsimile
Mr. Louis Nevell

PHYLIS KRISTAL
1460 BLOAN DR.
LOS ANGELES, CA 90048

RECEIVED

JUL 15 1996

July 8, 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Dear Mr. Stone:

It has been brought to my attention that there still exists the possibility of a garbage dump in Mission Canyon and/or Rustic or Sullivan Canyons. I am shocked that such an action would be considered in light of the problems caused by the previous landfill in Mission Canyon, where volatile methane gas is still being monitored. The danger caused by the increased traffic into the area seems unthinkable. What if a spark set off an explosion? Hundreds of homes would be affected.

In addition, residents of Bel Air Skycrest have only Sepulveda Boulevard and the San Diego Freeway for north/south travel, and additional traffic caused by a landfill would impact not only us but all drivers who use these two critical arteries.

As a person under a doctor's care for allergies, the spectre of a landfill in my backyard fills me with anxiety. The L.A. smog causes me enough problems without being forced to breathe toxic fumes in my own home.

PLEASE DISCARD ANY NOTIONS OF BUILDING THIS LANDFILL AND LEAVE THE AREA AS OPEN SPACE.

Phyllis Krystal

P61

P61

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Please refer to Topical Response #6 for further discussion.

A

JULY 11, 1996

MR. HARRY STONE
DIRECTOR OF PUBLIC WORKS
900 SOUTH FREMONT AVENUE
ALHAMBRA CA 91803

RECEIVED

JUL 15 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

SUBJECT: A LANDFILL IN MISSION CANYON

Dear Sir:

I am writing you this letter to oppose the conditional use to utilize Mission Canyon as a sanitary landfill by the County Sanitation District. This opposition is due to the following health and safety reasons:

1. The Mission Canyon area has critical traffic problems, often resulting in gridlock on major commuting corridors along Sepulveda Blvd., Mollholland Drive and the San Diego Freeway. Additional traffic generated by a landfill would impact thousands of commuters between the Westside and the Valley and Downtown.
2. Sepulveda Blvd. is a trap for two major communities, Bel Air Crest and Mountaingate. Both of these areas have only one exit for daily travel or disaster evacuation. Mountaingate Drive, the only entrance to over 300 homesis approximately 110 feet from the entrance to Mission Canyon. Additional traffic generated by the opening of the Skirball Cultural Center and the Betty Museum will not only increase car travel in the area, but multiply tour buses and school buses as well.
3. Mission Canyon was previously the site of a landfill; and that activity did incalculable harm. That first landfill polluted the area with volatile methane. Today and everyday, some 1500 cubic feet per minute is being pumped out of 15 wells placed in critical areas. The methane has caused numerous fires, and has resulted in the abandonment of property on the perimeter judged to be unsafe.
4. The request by the County Sanitation District for a conditional use to utilize Mission Canyon as a sanitary landfill has been twice denied overwhelmingly by the Los Angeles City Council, first in 1977 and again in 1981. Those denials came after extensive public hearings and exhaustive environmental studies revealing the overwhelming impact on the area, and resulting in the City Council's determination that legal findings could not be made to allow the dumping of garbage in Mission Canyon.

P62

P62

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Please refer to Topical Response #6 for further discussion.

5. Today, 15 to 19 years after those decisions came down, the impact would be significantly greater. In addition to thousands of additional residents, Mission Canyon and all its environs have become an educational-cultural corridor with six schools, a church, a synagogue, a university and a cultural center on the periphery of the proposed landfill.
 6. As a result of that earlier landfill, buried in that canyon today, there are 5,250,000 tons of refuse. Fifty percent of it according to E.I.R. is volatile. This danger is acknowledged by the fact that -by court order- there are at least 45 permanent probes and explosimeters that measure the methane in and around Mission Canyon. These probes are located on developments off of Mullholland, Bel Air Knolls and Bel Air Skycrest, as well as in Mountaingate. They require monitoring so any off-site migration of methane will be detected and investigated. The movement of countless additional vehicles into the area would only increase the danger of explosion and fire set off by a spark.
 7. There are also legal reasons why you cannot place another landfill in Mission Canyon, not the least of which is that the Sanitation District, when it first gained access to the Canyon, agreed that the area would be turned over for parkland. Mission Canyon is "Open Space" on the community plan. We suggest that you consult with the Los Angeles City Attorney for a whole litany of other legal prohibitions, including lawsuits for inverse condemnation in loss of value to homes and institutions.
 8. Mission, Sullivan and Rustic Canyons are all of a piece. A special natural resource smack in the middle of a densely populated city that is "park poor". These environmental gems - extensively used by thousands from all over the city, as well as the residents of the area should be cherished, not violated and polluted.
- On behalf of my fellow residents and the public that traverse Mission Canyon, we urge you to discontinue the plan to utilize Mission Canyon as a landfill.

THANK YOU AND BEST REGARDS.

Z. M. Motameni

ZAHRA MOTAMENI
12520 Promontory Road
Los Angeles CA 90049

7/10/96 A

RECEIVED

JUL 15 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Dear Mr. Stone:

Enclosed please find all the reasons why Mission Canyon should not be used as a garbage dump. We are residents of Bel Air Skycrest, which is adjacent within feet of Mission Canyon.

Sincerely
Mr. & Mrs. Robert Seligson

P63

P63

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Please refer to Topical Response #6 for further discussion.

request by the County Sanitation District for a conditional use to utilize Mission Canyon as a sanitary landfill has been twice denied overwhelmingly by the Los Angeles City Council, first in 1977, and again in 1981.

Those denials came after extensive public hearings and exhaustive environmental studies revealing the overwhelming impact on the area, and resulting in the City Council's determination that legal findings could not be made to allow the dumping of garbage in Mission Canyon.

Today, 15-to-19 years after those decisions came down, the impact would be significantly greater. In addition to thousands of additional residents, Mission Canyon and all its environs have become an educational-cultural corridor with six schools, a church, a synagogue, a university and a cultural center on the periphery of the proposed landfill.

The Mission Canyon area has critical traffic problems, often resulting in gridlock on major commuting corridors along Sepulveda Boulevard, Mullholland Drive and the San Diego Freeway. Additional traffic generated by a landfill, would impact thousands of commuters between the Westside and the Valley and Downtown.

Sepulveda Boulevard is a trap for two major communities, Bel Air Crest and Mountaingate, both of which have only one egress or ingress for daily travel or disaster evacuation. Mountaingate Drive, the only entrance to approximately 300 homes, is approximately 110 feet from the entrance to Mission Canyon. Additional traffic generated by the opening of the Skirball Cultural Center and the Getty Museum will not only increase car travel in the area, but multiply tour buses and school buses as well.

Mission Canyon was previously the site of a landfill; and that activity did incalculable harm. That first landfill polluted the area with volatile methane. Today and every day, some 1500 cubic feet per minute is being pumped out from 15 wells placed in critical areas. The methane has caused numerous fires, has resulted in the abandonment of property on the perimeter judged to be unsafe.

•As a result of that earlier landfill, buried in that canyon today, there are five million, two hundred and fifty thousand tons of refuse. Fifty percent of it, according to the E. I. R., is volatile. This danger is acknowledged by the fact that —by court order— there are at least 45 permanent probes and explosimeters that measure the methane in and around Mission Canyon. These probes are located on developments off of Mullholland, Bel Air Knolls and Bel Air Skycrest, as well as in Mountaingate. They require monitoring so any off-site migration of methane gas will be detected and investigated. The movement of countless additional vehicles into the area would only increase the danger of explosion and fire set off by a spark. In 1980, a downed power pole ignited brush in the vicinity of a school. The brush was fed by seeping methane. The flames were so intense a fire department facility located less than a half mile away could not stop the blaze. That fire burned across Mission Canyon, burned open areas surrounding Mountaingate, jumped Mandeville Canyon, and was not stopped until it reached Malibu. Fires have erupted in the rough below fairways, and have burned across the grass of the Mountaingate golf course.

•There are also legal reasons why you can not place another landfill in Mission Canyon, not the least of which is that the Sanitation District, when it first gained access to the canyon, agreed that the area would be turned over for parkland. Mission Canyon is "open space" on the Community Plan. For a whole litany of other legal prohibitions, including lawsuits for inverse condemnation in loss of value to homes and institutions, we suggest you consult with the Los Angeles City Attorney.

•Mission, Sullivan and Rustic canyons are all of a piece.—A special natural resource smack in the middle of a densely populated city that is 'park poor.' These environmental gems —extensively used by thousands from all over the city, as well as the residents of the area —should be cherished, not violated and polluted.

•It is instructive to quote an excerpt from your own statement of criteria for siting a landfill:

QUOTE: "The objectives of the siting criteria are to protect the public health and safety and our natural resources. Protect the residents, protect air, surface water and groundwater quality. Protect environmentally-sensitive areas. Insure safe transportation of solid waste. Insure the structural stability and safety of the landfill, and protect the social and economic well-being of the community." **END QUOTE.**

Given the conditions in existence and the jeopardy to residents and institutions in the area by pollution of air, water and the natural environment of the mountains, we do not believe you can meet either the necessary legal findings or any your own criteria.

They want a form letter

RECEIVED

JUL 16 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Dear Mr. Stone,

This letter is in protest of the request for the use of Mukewo Canyon as a landfill.

One of the main reasons my family purchased property in Bel Air, Skycrest Over Company was the promise of a park for families and their children. We are still waiting. Instead we encountered the purchase of gas pipelines, methane gas from the prior owners in the canyon. At that time, we were advised that using this part of the city as a landfill would never happen again.

As of the present time, the methane gas is being pumped from 15 wells and is still a potential fire hazard, causing the abandonment of property to the detriment of the canyon.

A fire in 1989 from a downed gas pipe, led by the gas, prompted Mandeville to request beachfront Dredging.

Traffic in this area has increased tremendously. Because of the increased use of commercial land on Mulholland Drive and here a new church, synagogue, 2 universities, a museum and 4 private schools. The increase and commitment to the facilities should not be subjected to the traffic of refuse trucks, dirt roads, noise and danger of accidents. The increased traffic will also exacerbate the already nightmarish conditions on the 705 and 805.

Sincerely,
Frank White - Engineer

P64

P64

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Please refer to Topical Response #6 for further discussion.

July 17, 1996

RECEIVED

JUL 22 1996

DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

Mr. Harry Stone, Dir. of Public Works
900 South Fremont Ave.
Alhambra, California 91803

Dear Mr. Stone:

No doubt you are aware of the many important reasons to oppose the garbage dump in the Mission Canyon landfill, but we will briefly reiterate some of the obvious points necessary to take into serious consideration..

Since 1981, when the County Sanitation District's request for using Mission Canyon as a landfill was denied for the second time by the Los Angeles City Council, additional schools and institutions have been built including a high school, the Skirball Museum, Hebrew Union College and the prospective opening of the Getty Museum, all in the same surrounding area. Traffic was horrendous previously but with the many dump trucks adding to the tumult, it will be a gridlock nightmare!

Many of us are still living precariously near the original landfill which necessitates 15 wells to pump approximately 1500 cubic feet PER MINUTE of methane gas which has caused innumerable fires over the years. The stench of smoke from these fires (not to mention the garbage smell) still remains in our memories. Property in this hazardous area has been abandoned and presumed to be unsafe. According to the E.I.R., 2, 625,000 TONS of refuse from the original landfill is volatile. By court order, at least 45 probes and explosimeters measure methane in and around this area. In 1980, a fire near one of the schools was fed by seeping methane, making it impossible for a near-by fire department to control the blaze which eventually burned across Mission Canyon, open areas around Mountaingate, jumped Mandeville Canyon and was not controlled until it reached Malibu.

To quote from your own statement for landfill siting: " THE OBJECTIVES OF THE SITING CRITERIA ARE TO PROTECT THE PUBLIC HEALTH AND SAFETY AND OUR NATURAL RESOURCES. PROTECT THE RESIDENTS. PROTECT AIR, SURFACE WATER AND GROUND-WATER QUALITY. PROTECT ENVIRONMENTALLY-sensitive areas. Insure safe transportation of solid waste. INSURE THE STRUCTURAL STABILITY AND SAFETY OF THE LANDFILL, AND PROTECT THE SOCIAL AND ECONOMIC WELL-BEING OF THE COMMUNITY".

Considering the precarious existence and potential danger to residents and various institutions mentioned above we hope you will re-evaluate the previous paragraph pertaining to the Mission Canyon landfill situation. There are many more important factors to be mentioned, but at the risk of losing your interest from a lengthy letter, we trust that your intelligence and integrity will prevail against any incompetent and immoral decision.

Thank you for your courtesy.

Sincerely,

Handwritten signature

Mr. & Mrs. Hi Hand
16456 Sloan Dr.

Los Angeles, Ca. 90049-1157

P65

P65

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Please refer to Topical Response #6 for further discussion.

14

RECEIVED
JUL 25 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAM

July 22, 1996

Mr. Harry Stone
Director of Public Works
900 South Fremont Avenue
Alhambra, California 91803

Dear Mr. Stone:

I write in opposition to adding Mission Canyon to the list of canyons in the County's inventory of potential landfill sites.

I have lived in the Bel-Air Skycrest development since 1972, and twice the County Sanitation District has been denied conditional use of Mission Canyon as a sanitary landfill. These denials came after extensive public hearings and exhaustive environmental studies revealing the overwhelming negative impact on the area. I submit that today, the environmental, traffic and potential health hazards are even greater. The area adjacent to Mission Canyon now has six schools, a church, a synagogue, a university and a museum/cultural center, with an additional museum to be opened sometimes in 1997. The traffic in the areas has increased four fold since 1988. Often during rush hour, it takes up to twenty minutes to enter the southbound 405 Freeway from Mulholland. Further, the fire hazard from seeping methane has not been mitigated. I lived through the fire of 1980 that swept through Mission Canyon, led by seeping methane, and I, and other residents in the area know what a devastating experience that can be.

Given the conditions in existence and the jeopardy to the residents and the institutions in the area, I urge you not to seek a conditional use permit to use Mission Canyon as a landfill.

Sincerely,

Vivian J. Arterbery
Vivian J. Arterbery
16440 Sloan Drive
Los Angeles, California 90049

P66

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Please refer to Topical Response #6 for further discussion.

7/2/76

HOW DARE YOU?!

How Dare You even consider dumping
garbage in

the backyards of our homes,
schools, churches and temples?

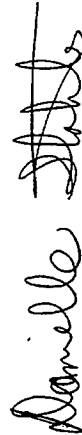
How Dare You destroy the
beautiful Getty and Skirball
cultural centers in Mission Canyon?

How Dare You force the
schoolchildren, who attend the
seven schools in the Mission
Canyon area, to endure the
traffic, noise, stench and disease of
garbage?

We Will Not Tolerate being
on your list of possible
DUMP SITES!

We Will Be Sure To Vote
any politician responsible out
of office!

Danielle Stahler
Bel Air Skycrest
Homeowner
Association



RECEIVED
JUL - 31
DEPARTMENT OF PUBLIC
ENVIRONMENTAL PROTECTION

P67

P67

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Please refer to Topical Response #6 for further discussion.

June 27, 1996

Mr. Harry Stone
Director of Public Works
900 South Fremont Avenue
Alhambra, CA 91803

RECEIVED

AUG 1 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROTECTION DIVISION

Dear Mr. Stone:

I am writing to state my adamant opposition to the Los Angeles County Sanitation District proposal for conditional use of Mission Canyon, Rustic Canyon or Sullivan Canyon as a Los Angeles County public landfill. I join with Los Angeles County Supervisor Zev Yaroslavsky and the Los Angeles City Council, which has twice voted overwhelmingly to oppose the use of these canyons as a landfill site.

Your own criteria for opening a landfill states your objectives are "to protect the public health and safety," "protect residents, protect air," "protect environmentally-sensitive areas," and "protect the social and economic well-being of the community." Given such standards, it goes against all reason and is a direct violation of your stated objectives to propose yet another landfill at Mission Canyon or the other two canyons, and I am totally against it.

My opposition is based on several factors. First, there have been extensive public hearings as well thorough environmental studies which clearly state the overpowering impact such a landfill would have on the area and which resulted in the City Council's determination legal findings could not be made to allow dumping trash and garbage. Now, nearly twenty years after those decisions, the consequences would be even greater. Not only are there thousands of additional residential-cultural corridor with six schools, a university, church, synagogue and cultural center on the periphery of the proposed landfill. In addition, the LACO Sanitation District agreed to turn the area over as a "parkland" and Mission Canyon is designated an "open space" on the Community Plan. The Los Angeles City Attorney's office can cite other legal impediments, which include numerous pending lawsuits and legal prohibitions.

Second, Mission Canyon has already been the site of a landfill and it has done terrible harm. It polluted the area with volatile methane gas. Now approximately 1,500 cubic feet per minute is being pumped out of fifteen walls placed in various areas at the site. There have been numerous fires caused by the methane. Property has been abandoned on the perimeter of the landfill because it was judged to be too dangerous. There are 5,250,000 tons of refuse in the landfill, 50% of which is volatile, according to an environmental impact report. There is a court order mandating at least 45 permanent probes and explosimeters at the site to monitor the methane gas caused by the

P68

P68

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See Topical Response #6.

extant landfill at Mission Canyon. The probes are located on developments off of Mulholland, Bel Air Knolls, Bel Air Skycrest and Mountaingate. Any vehicle in the area could be the cause of an explosion and fire. A downed power pole caused a fire in 1980 which was fed by brush and seeping methane. The intensity of the fire was so great the nearby local fire company could not contain it and, before it was controlled, had burned across Mission Canyon, open areas around Mountaingate, jumped to Mandeville Canyon and reached Malibu. Methane generated fires have burned grass of the Mountaingate golf course and erupted in the rough below fairways there.

Third, Mission Canyon has critical traffic problems which is routinely manifested by gridlock along Sepulveda Boulevard, Mulholland Drive and the San Diego Freeway. Allowing the landfill would generate additional traffic and would adversely affect thousands of daily commuters between the Westside, the San Fernando Valley and Downtown Los Angeles.

Fourth, the Bel Air Crest and Mountaingate communities have only one ingress and egress, Sepulveda Boulevard, for travel as well as for disaster evacuation. Mountaingate Drive, for example, is the only entrance to more than 300 homes and is also approximately 100 feet from the entrance to Mission Canyon. With the opening of the Skirball Cultural Center and the soon-to-be-opened Getty Museum there is going to be a huge increase in car travel to the area as well as many more tour and school buses. Sepulveda thus becomes a trap for residents of those two communities with yet more additional traffic that would be caused by landfill activities.

Finally, Mission Canyon, Rustic Canyon and Sullivan Canyon are an interrelated, natural resource in the middle of one of the most highly populated areas in America. The canyons are used extensively by thousands of people from all over the county and cities in the area in addition to the recreational use made by local residents. Such a natural resource should be cherished, preserved and enhanced, not destroyed and polluted or made into a landfill.

There is no question opening a landfill at Mission, Rustic or Sullivan Canyons will cause harm and will jeopardize residents and public institutions in the area because of air pollution, fire hazard, nearly insurmountable traffic problems, safety issues related to already high traffic volume and the destruction of the natural environment of the area, all of which violate your own standards for choosing a landfill site. It also does not appear you meet any of the existing legal findings, not to mention additional legal consequences that will result if you persist in efforts to open another landfill in this area.

Therefore, I request you reconsider your proposal and I would appreciate your response to my letter.

Yours truly,

Colin Johnson



Natural Resources
Defense Council

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September 16, 1996

Donald L. Wolfe
Deputy Director
Los Angeles County Public Works
900 So. Fremont Ave.
Alhambra, CA 91803-1331

RECEIVED

SEP 18 1996

DEPARTMENT OF ENVIRONMENTAL AFFAIRS
ENVIRONMENTAL RECORDS

Dear Mr. Wolfe,

On behalf of the working group members, I would like to thank you for the opportunity to meet and discuss with you and your staff some of our recommendations for how to develop a stronger and more useful planning tool for waste management in this region. This letter summarizes our discussions regarding how to enhance and improve the Los Angeles County Siting Element and the Summary Plan of the Los Angeles County Countywide Integrated Waste Management Plan and our recommendations for their modification.

A key goal of the working group was to provide general feedback and examples regarding how to strengthen these two documents. However, we feel strongly that in order for staff to invest themselves in the implementation and success of the programs and policies selected for inclusion in the documents, they must develop the specific tasks themselves. With that in mind, we hope that our examples can guide staff in developing an effective and reasonable tool for achieving maximum diversion in the County.

A fundamental recommendation made by the working group members throughout the review process was with respect to the lack a significant connection between the Siting Element and the Summary Plan. We believe that in order to develop an integrated waste management process there must be linkage between disposal capacity need and the types of diversion programs and policies which can be selected. This link should be made by expanding on policy in the Siting Element and acknowledging in the Summary Plan, the role diversion activities can play in assuring disposal capacity. This is a request which asks you to go beyond the letter of the law but we think that it is a critical necessity to do so. Moreover, this is supported by the actions of counties such as Alameda, San Diego, and Ventura which have not only made the linkage between disposal capacity and diversion policies but have gone as far as stating in their Siting Element their goal of minimizing disposal need.

We understand that there will not be agreement in all areas but we hope that serious consideration will be given to each area of concern and each recommendation. At minimum, we would like to receive a written response identifying the areas where we do have agreement and a short explanation for those areas where we don't agree. Our summary is as follows:

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COUNTYWIDE SITING ELEMENT

1. Data Selection and Capacity Need Projections

The working group expressed concern over growth rates for waste generation provided in Chapter 4 which seemed counterintuitive. The data charted in Table 4-14 depict a relatively flat employment growth rate, a moderately increasing population rate and an exploding taxable sales growth rate. The sharp increase in taxable sales appears after the year 2000 and continues indefinitely. This trend is out of sync with the taxable sales charted for the period between 1990 and 2000. The activity which would account for such a phenomenal rise in taxable sales is not explained. Furthermore, this section of the growth curve is based on information provided by the State Department of Finance which has since pulled those projections from public circulation and as a matter of policy, will not stand by those projections any longer.

Also, while taxable sales figures bear an incredible amount of weight in the calculation of waste generation it is questionable to what degree such a figure accurately portrays waste generation activity. For example, if you take statewide taxable sales for 1995, auto sales account for over 17% of the total, second-hand merchandise accounts for 4.5%, and business and personal services accounts for another 4.9%. These activities are not generally considered to be big waste generators. In fact, cars don't go to landfills and second-hand sales are a waste reducing activity.

The working group believes that there are three key reasons why waste generation is being over-estimated. First, is that the data selected is from a hodgepodge of sources both statewide and regional that do not accurately reflect what is happening in Los Angeles County. Second, is that the calculation model itself is flawed because it is driven by sales tax figures which inaccurately reflect waste generation activity. Third, the waste generation projections are not taking into account waste generation trends of the past ten years and attempting to draw inferences regarding future trends. By the latter we mean that given the dramatic reduction in waste generation in the early 1990's, why are we so willing to accept similarly dramatic growth in the opposite direction after 1995? We should instead be questioning such projections given that our employment base is growing at a marginal rate with growth concentrated in the service sector (not recognized as a large waste producing sector - see the City of Los Angeles SRRE for survey results of waste generation in industrial/commercial sectors).

Our recommendation generally, regarding this issue is that Public Works staff make another attempt at locating Los Angeles County specific data and that they not take the results of the state provided calculation for granted. The calculation results should be evaluated for whether they make logical sense given what we know about waste generation activity and past trends. As we've discussed the state will accept other data for their methodology and will even accept an independent analysis of the county waste stream. The working group further cautioned against using state data in the calculation because County conditions are not necessarily comparable and in many instances, County data should be much lower than the state numbers.

P69.1

P69.1

The discussion on waste generation and disposal need projections has been revised. Please refer to Chapter 4, Section 4.4. of the Final Draft CSE and Topical Response #8 for further discussion.

2. Capacity Shortfall - Time to Crisis Definition

We expressed concern over the use and definition of the term "capacity shortfall" because the manner in which it is being used implies unpreventable and imminent crisis. For purposes of accuracy, the working group members suggested that this term be revised to reflect its meaning with respect to the specific scenario being discussed. It must be made clear that the "shortfall" period is determined by the waste management policy/program choices made in the region over time and is by no means fixed or static. The explanation of the "shortfall" must include discussion of how different choices or scenarios affect the "time-to-crisis" analysis. For example, it is misleading to say in the Executive Summary (page ES-6) that a "disposal capacity shortfall may occur as early as 1999" without an explanation that this is only the case under a scenario of no new or expanded landfills, and that additional scenarios show different outcomes.

The places in the Siting Element where revisions should be made to the explanation of "shortfall" include the Executive Summary (pages ES-6 and ES-10) to state that other scenarios show different outcomes, and to section 4.5.2.1 Understanding the Time-to-Crisis, section 4.5.2.2 Definition of Time-to-Crisis and Garbage Crisis and section 4.5.2.4 Time-to-Crisis Analysis to reflect the point that the period to "crisis" are determined by the specific waste management choices made by jurisdictions in the region. The explanation provided in the Siting Element must assist waste managers and decision-makers in weighing the value of their choices and facilitate regional cooperation in making program and policy decisions that aim at achieving the scenario best suited for the county as a whole. This objective can be accomplished by providing multiple scenarios depicting the wide variety of proven waste management options currently available and their different affects on the shortfall analysis.

3. Time to Crisis Scenarios

The working group recommended that more than two scenarios for determining the "shortfall" period be developed because the two currently provided only depict the most extreme cases. For example, to counterbalance the two existing scenarios which present the "all or nothing" perspectives, other scenarios reflecting the "middle ground" could be presented. These could include planning only for projected capacity need so that the scenarios would reflect fewer if any, expansions and/or no new sites, and no or significantly less, excess capacity.

The working group recommended specific examples of additional scenarios such as showing the impact of waste export opportunities, potential landfill saving techniques like baling and waste shredding, foam and tarp alternative daily covers, and certain waste diversion policies such as variable can fee programs, and sewage sludge, green waste and inert materials bans. To illustrate that these ideas are not beyond the scope of what County Public Works can provide quantifiable measures for, please refer to the Los Angeles County Solid Waste Management Plan, August 1985, Appendix 3F which quantifies the landfill savings from shreddfills, balefills, waste exports, and an inert waste ban. Even though the 1985 plan was drafted at a time when potential diversion was thought to be minimal (2-3% maximum), the evaluation provided in this document was more comprehensive and had a more integrated approach.

P69.2 Comment noted. The analysis has been revised and includes additional scenarios. Please refer to Sections 4.5 and 4.6 of the Final Draft CSE and Topical Response #8 for further discussion.

P69.3 Comment noted. Please refer to response #P69.2 above. Additionally, the Final Draft CSE, Chapter 5, incorporates a section which discusses alternative methods of extending the life of existing Class III landfills, such as use of alternative daily covers, etc. Also, please refer to Topical Response #2 for further discussion.

For purposes of updating potential diversion estimates from various diversion policies and programs, I have provided Mike Mohajer with trade journal articles which provide study results regarding landfill capacity savings from using alternative daily cover such as foams and tarps and through the implementation of variable can fee systems. I am additionally enclosing a recent article from Resource Recycling that includes variable can fee information from local cities.

The working group suggested adding the new scenarios to chapter 4 of the Siting Element to provide the continuity in the existing framework. Since section 4.7 lists the conclusions to the time-to-crisis analysis, it must also include a review of the results of the additional scenarios developed by Public Works staff regardless of their ultimate location in the Siting Element.

4. Out-of-County Landfills

The working group recommended the addition of a chart to Chapter 8 for out-of-county landfills similar to Table 4-3 in Chapter 4 depicting permitted combined disposal capacity of existing solid waste disposal facilities. The working group recommended that this chart be added because waste does not follow jurisdictional boundaries and there is a very high potential for increased waste exportation as landfills such as BKK and Lopez Canyon close their operations. Such a chart illustrates that waste exportation is a viable option. It additionally, sets up the background for a shortfall scenario that includes increased waste exportation in its calculation.

5. Goals for Promoting Waste Diversion

Page 2-7 of the Siting Element provides a very limited scope of policies for how to promote waste diversion activities at disposal facilities. Even the 1985 County Solid Waste Management Plan which was premised on the outdated conclusion that only 3% diversion was possible, included a wider review of potential actions that could be considered for increasing diversion. Please see page 3-4 of this document for a discussion on how adjusting tip fees can impact waste received at landfills and Appendix 3-F of same for methods for extending the life of disposal sites. At minimum, the Siting Element should include a section providing an updated review and analysis of these approaches.

6. Reference to the 1988 Los Angeles County Solid Waste Management Action Plan

The Siting Element replaces the 1988 Action Plan by establishing new goals and policies, and providing an updated review of landfill capacity status, reviewing current disposal rates, and assessing current capacity need. We believe that it is inappropriate and unnecessary to continue referencing the outdated Action Plan or its goal of obtaining 50 years of in-county capacity. This reference is a sticking point for members of the working group who strongly believe that AB 939 mandates a new direction for waste management and that rather than emphasize landfilling as the 1988 Action Plan does, our regional waste plans must focus and prioritize maximum diversion.

The working group members recommended that if it was absolutely impossible to omit reference to the 1988 Action Plan, then a better approach to including it would be to discuss it in

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A new table (Table 9-1) has been added in the Final Draft CSE, which summarizes key information regarding existing and proposed out-of- Los Angeles County landfills that may be available to receive waste from Los Angeles County for disposal.

Pursuant to State law, the CSE addresses the disposal capacity needed for the residual waste which remains after recycling, composting and other waste diversion activities. Please refer to Topical Response #1 for further discussion.

Please refer to Topical Response #12.

a section on "Historical Perspectives." This section could summarize all of the County's previous waste management plans and discuss how circumstances have changed since then and why it is now necessary to replace them.

SUMMARY PLAN

1. Executive Summary

The Executive Summary for the Summary Plan begins with an explanation of the purpose for the plan. The working group agreed that the Plan must comply with the requirements of AB 939 to describe the current system of solid waste management in the region; to summarize the types of programs planned in the individual jurisdictions; and to describe programs that could be consolidated or coordinated Countywide. However, the working group also recommended that in order for the Plan to be useful in helping waste managers and other decision-makers to select the most effective programs and to facilitate cooperation and implementation of regional diversion efforts, the Plan must go beyond the requirements of the State and link diversion policies and programs to disposal capacity need.

In particular, the Plan must provide more detailed information on what specific actions are necessary for realizing individual diversion goals and discuss the link to reduced landfill capacity need. The Executive Summary alludes to such information by stating that the policies included in the Plan provide specific actions and that its objectives provide specific and measurable milestones for measuring progress. However, Chapter 2 on Goals, Policies, and Objectives, falls short of what the Executive Summary promises to deliver.

2. Chapter 2: Goals, Policies, and Objectives

The working group expressed concern that Chapter 2 of the Summary Plan does not provide an effective strategy or any mechanisms for measuring progress to assist the region in achieving the State mandated diversion goals. In general, our comments were that the statements were incomplete and needed to be finished. Even the 1985 Los Angeles County Solid Waste Management Plan which only targeted 3% diversion, provided more specific recommendations on what actions the region needed to take in order to maximize diversion and waste reduction. Please refer to pages 4-10 to 4-15 of this document for a description and listing of "possible activities to implement waste reduction" and "potential actions designed to increase recycling." See also pages 9-6 to 9-8 for "recommended plan for waste reduction" and recommended plan for resource recovery." In addition, Appendix 9A, pages 4-5 of the 1985 Plan provide specific recommendations for short-term and medium-term planning. These references provide an example of the level of specificity that should be incorporated into the 1996 plan.

Even if Public Works staff do not agree with the specific policies, actions, and recommendations set forth in the 1985 document, they should consider a similar framework; one that provides clear and concise steps that any jurisdiction could understand and follow by simply opening up the plan and reading it. The goals, policies, and objectives should serve as the road

map for the region on where the cooperative opportunities lie, where to go for assistance, and on how to divert and reduce waste effectively.

Additionally, the working group provided the following specific comments and examples regarding the six goals of the Summary Plan:

- a) Goal 1's policies provide only general actions stating that jurisdictions "will support and contribute to the implementation" and "will continue and expand as necessary" various diversion programs and activities. In order to provide more specificity to these actions, the policies must provide some mechanics to the statements quoted. For example, the statements should be completed in the following manner: "will support and contribute to the implementation by doing X, Y, and Z" and "will continue to expand as necessary by doing X, Y, and Z."

The objectives for this goal must be completed similarly to the method described above. As currently written, there are no measurable milestones or reporting mechanisms provided by any of the objectives. For Goal 1, the objectives all begin with the general term "enhance." This term does not allow for an effective measure of progress since any action, no matter how small, can be considered to have enhanced a program even if the impact to diversion and waste reduction is minimal or even noticeable. The objectives need some form of quantitative measure. For example, to enhance the Christmas tree program "the program will be increased from X number of jurisdictions to Y number", and the Countywide Backyard Program will be enhanced by "increasing the program from 13 sites to X number of sites." In addition, by quantifying objectives it will become clear that in some cases, selected objectives may not be the best to achieve AB 939 goals.

- b) The policy of Goal 2 needs to be strengthened by providing more detail regarding what will be included in the "integrated solid waste management system" which all of the cities will develop and implement. At minimum, some detail should be given regarding what specific actions this system will attempt to accomplish. For example, will it be a system that can hold jurisdictions accountable for fulfilling their responsibilities to meet diversion goals or for fulfilling any obligations to participate in regional efforts? Will it be a system that will have financial obligations?

As in Goal 1, the objectives of Goal 2 need measurable milestones and reporting mechanisms.

- c) The policy of Goal 3 should describe the actions which the Task Force must take in order to accomplish the activities listed. For instance, will the Task Force develop a plan, schedule or agenda for accomplishing the listed activities, and by when will this happen? In its objectives, Goal 3 should provide a more specific timeline than the 5 to 10 years listed in the timeline at the end of the Summary Plan. How else can progress by the Task Force in meeting these objectives be measured? Additionally, the objectives need to be tied more specifically to the activities listed in the policy.

For example, which interjurisdictional arrangements, agreements, and/or program integration are being referred to here, what is their purpose, and is there an order of priority?

- d) The policy of Goal 4 states that the Task Force will establish standards for procurement but does not provide any information on how this will be done. For example, this policy statement could be completed by answering the following: Will a model procurement ordinance be developed? Will the County's existing procurement ordinance be reviewed for effectiveness? What strategy will be followed to promote the adoption of such a program in other jurisdictions?

The objective of Goal 4 only refers to the expansion of the recycled product and technical assistance program. Besides needing some measure of how much expansion is necessary, this objective doesn't correlate in any way with how to accomplish the policy to develop procurement standards. Additional objectives should be developed that provide a measure for market development progress.

- e) The policy of Goal 5 must describe steps which the Task Force will take to assist cities in securing public education and promotional materials for diversion and waste reduction activities. For example, will they collect materials and serve as a clearinghouse or will they develop and distribute original material? Will they require financial contributions from each jurisdiction or what other mechanism will they use to secure participation and follow-up?

The objectives for Goal 5 need to be completed by providing a number, a percentage, a date, or some other quantitative measure and a reporting mechanism that will communicate the target of each objective and so that a determination can be made as to when or if, the target has been met.

- f) The policy of Goal 6 unnecessarily and inappropriately refers to the 1988 Action Plan. The Action Plan is superseded and replaced by the 1996 Summary Plan and Siting Element and has no place under this particular Goal. The policy would be more accurate and appropriate if revised to read as follows:

"Support the development of new disposal facilities and expansion of existing facilities identified in the Countywide Siting Element as long as they are found to be technically and environmentally feasible."

A policy directing the Task Force to "actively seek and identify" technologies for saving capacity at disposal sites, should be added to this Goal. Objectives complementing this additional policy should include the task of investigating technologies such as baling, shredding, and foam and tarp alternative daily covers, and the task of conducting pilot projects to measure potential landfill savings.

3. Additional Goals

In addition to the comments regarding the six goals in the Summary Plan, the working group recommended that three more goals be added. These include the following:

- a) Goal 7 should be a goal in which the County commits to being a leader and model for diversion activities throughout the county. We recommend including at minimum, the following five objectives:
 - Maximize diversion in the County unincorporated areas.
 - Maximize diversion at County facilities and all County operations.
 - Require diversion in all County waste management contracts.
 - Increase the development of markets through County actions.
 - Establish regular reporting of progress in meeting diversion goals.
- b) Goal 8 should provide a timeline for reviewing the goals and assessing progress of Countywide diversion activities.
- c) Goal 9 should lay out a strategy for developing at a future date, mechanisms for measuring each goal and regular reporting to the Board of Supervisors. This is especially important in cases where it is not currently possible to provide measurable milestones for the objectives of Goals 1-8.

Because we believe that the County has an excellent record for meeting deadlines, we feel that a requirement to provide regular reporting requirements to the Board will insure that activities are implemented and timelines are observed. Such reporting will also allow the County to receive recognition for acting as a leader and provide publicity for model programs.

4. Chapter 5

The programs described in pages 5-31 to 5-57 of the Summary Plan, contain a section entitled "Reason for Selection" which implies that they have been targeted for enhancement or development. However, the working group was unclear as to where and how they fit into the overall strategy laid out in Chapter 2. For those programs in which it applies, there should be a clearer and more direct connection to the goals, policies, and objectives of Chapter 2.

If the programs in the referenced pages have been selected for either enhancement or development, then it would also be more effective to omit terms like "may be" or "can be" because it makes them weaker and less directive. Instead, if there are a number of options available, these should be provided as a list of items that should be reviewed and evaluated for appropriateness.

Each program should also provide an additional section that calls out specifically what the role of the County will be in the unincorporated areas with respect to enhancement and/or development. This may help to clarify what the roles of each jurisdiction should be in contrast and should guide cooperative efforts by providing at least one reference point.

5. County Leadership

The working group made various recommendations that could fall under any number of areas having to do with specific policies or programs and which should be reviewed and considered for inclusion in the summary plan. Most had to do with establishing the County as a leader in developing and implementing diversion and waste reduction efforts. These include the following:

- a) Establish reporting requirements and specific measurable goals for County contracts in garbage collection districts and develop a model contract that builds in incentives for private haulers to maximize diversion.
- b) Develop and implement a model reporting system for obtaining periodic reports from County departments on recycling activities, recycled product purchases, and money saved by avoided landfill costs.
- c) Incorporate status updates on Market Development Zone progress/accomplishments in the quarterly report to the Board of Supervisors.
- d) Develop and implement model ordinances for the unincorporated area to discourage the landfilling and encourage the diversion of materials such as yard trimmings, inert materials, and tires. Promote the adoption of such ordinances by other jurisdictions.

CONCLUSION

The working group members would like to encourage the County to continue exploring additional opportunities for increasing diversion and waste reduction efforts. We believe that to date, there has been a vacuum in leadership for waste diversion and reduction in the region. Our motivation to work with you in reviewing the Siting Element and Summary Plan is based in our belief that the development of these documents provides an excellent opportunity for the County Public Works Department to step forward and fill the leadership gap to some extent.

We are encouraged by your willingness to meet and confer with us over these highly technical and somewhat controversial issues. We hope that we can continue our partnership into the future and that you will continue to rely on us, either individually or as a group, as a resource and planning aid. Our concerns and recommendations are supported by our collective expansive experience and expertise in the field of waste management. We hope that they are considered seriously and that you will find it valuable and necessary to incorporate many if not most, of them into the revised Siting Element and Summary Plan. We look forward to receiving your

written response to our comments and to reviewing the revised documents. If you feel that it is appropriate, you may consider these comments as formal comments to the Summary Plan and the Siting Element.

Sincerely,



Maribel Marin
Working Group Coordinator

- cc: Mike Mohajer, LA County Public Works
Shari F. Afshari, LA County Public Works
Carlos Ruiz, LA County Public Works
Dave Smith, LA County Public Works
Fred Rubin, LA County Public Works
Joan Edwards, J. Edwards and Associates
Mike Lewis, Alliance for Innovative Resource Management
Lynn Plambeck, LASER
Jane Hinshaw, City of Pasadena
Joseph Delaney, City of Santa Monica



Santa Clarita Valley
Canyons Preservation Committee, Inc.

P.O. Box 220748 • Santa Clarita, CA 91322-0748 • (805) 255-2594

October 15, 1996

RECEIVED

OCT 17 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS DIVISION

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

Re: Comments concerning the Los Angeles County Draft Countywide Integrated
Waste Management Plan

Dear Mr. Stone:

After reviewing the draft Countywide Integrated Waste Management Plan, it has become evident that too much emphasis has been placed on urban landfilling and not enough emphasis has been placed on research and development of more viable methods of waste management for the next fifteen years.

Elsmere Canyon is obviously not an option any longer. It is imperative, therefore, that any mention of Elsmere Canyon as a potential landfill be eliminated from the draft Countywide Integrated Waste Management Plan.

It is evident that urban landfilling is an out-dated, unpopular, dangerous method for waste management. It is incumbent upon your department, therefore, to update the Plan to characterize true and meaningful methods of waste management and disposal for future years.

I request, on behalf of my organization, a full and complete copy of the final Plan.

Sincerely,

Marsha A. McLean

Marsha A. McLean, President
S.C.V. Canyons Preservation Committee

P71.1 Please refer to Topical Response #14.

P71.2 Please refer to Topical Response #6.

P71.3 Please refer to Topical Response #2.

P71.4 This comment is acknowledged.

The Alliance For Innovative Resource Management

October 17, 1996

Harry W. Stone, Director
LOS ANGELES COUNTY PUBLIC WORKS DEPT.
900 South Fremont Avenue
Alhambra, CA 91803

RECEIVED

OCT 17 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

Attn: Mike Mohajer
3rd Floor Annex

Re: Comments on Draft Countywide Siting Element & Summary Plan

Dear Mr. Stone:

Attached for your review are comments prepared by the Alliance for Innovative Resource Management (AFIRM) on the Draft Los Angeles County Countywide Siting Element and Summary Plan of the Los Angeles County Countywide Integrated Waste Management Plan, January, 1996.

AFIRM's mission is to improve our urban quality of life and regional economic competitiveness by promoting resource conservation and recycling, by making known the true cost of urban landfills, and by promoting the implementation of integrated solid waste policies that maximize diversion.

We have attempted to identify the major deficiencies which we feel warrant a substantial revision of the draft documents. In short, the draft plan relies solely on in-County landfill disposal as the principle waste management strategy. Not only is this not consistent with the intent of AB939, it may also be legally flawed in light of a recent Supreme Court decision on flow control in Clarkstown, New York.

The recommendations contained in this report are a serious attempt to work cooperatively with the County, the 88 cities, and other stakeholders in the waste management arena. If you'd like to discuss this report further, please contact our consultant, Mike Lewis, at (909) 612-5707.

We appreciate the opportunity to submit these comments for inclusion in the administrative record. We look forward to the County's response to our comments and the appropriate modifications to the Draft Los Angeles County Countywide Siting Element, January 1996.

Sincerely,


William B. Hussey, Jr.
Regional Coordinator

"worthless waste - but a valuable resource"
11377 West Olympic Blvd, Suite 111
Los Angeles, CA 90064

LOS ANGELES COUNTY
INTEGRATED WASTE MANAGEMENT DRAFT COUNTYWIDE SITING
ELEMENT AND SUMMARY PLAN

A REPORT TO IDENTIFY THE
DEFICIENCIES AND RECOMMENDATIONS
RELATING TO SOLID WASTE POLICIES

OCTOBER 17, 1996

Page 1

A. Introduction

In 1989, California adopted Assembly Bill 939 (AB939), also known as the California Integrated Waste Management Act (CIWMA). The law changes state waste management policy to a more environmentally conscious and technologically efficient direction befitting of the 21st century. This act requires cities and counties to achieve waste reduction rates of 25% by 1995 and 50% by 2000, while maintaining at least 15 years of disposal capacity. Although waste reduction goals are feasible through advances in source reduction, rail haul, recycling and composting, meeting the State mandate alone is not the primary issue in evaluating County responsibilities.

Under the Act, California cities and counties are required to produce a series of solid waste planning and policy documents. These documents describe local waste diversion and disposal conditions while laying out realistic programs to achieve the waste diversion goals. Among these documents are two essential responsibilities of the County's Siting Element and the Summary Plan.

- The Siting Element describes landfill disposal needs and programs, particularly capacities of landfills and transformation sites.
- The Summary Plan brings together the Source Reduction and Recycling Elements (SRRs) for cities and unincorporated areas that detail local waste reduction programs. This plan outlines the various efforts each city is making to meet the AB 939 diversion goals. The Summary Plan must also show the goals, programs, and policies the County plans to implement in order to assist the cities in meeting their objectives.

After a careful analysis of both plans, it is apparent that neither the Siting Element nor the Summary Plan, as currently written, achieve the mandate of AB 939, or display an enthusiasm to pursue alternatives such as source reduction, rail haul, recycling, or composting. The plans dated by Los Angeles County focuses primarily on creating and expanding landfills inside County lines as the prime solution to addressing AB 939. Furthermore, these plans lack the progressive diversion programs needed to meet the 50% solid waste reduction requirement.

Although the AB 939 statute requires landfilling only for substances that cannot be reduced, recycled, or composted, the current documents clearly ignore this mandate and outline a plan to dispose 50% of County-produced trash within County landfills, and even recommend the creation of additional landfills.

This report attempts to document the deficiencies in the Los Angeles County Siting Element and Summary Plan. The purpose of this effort is to develop a consensus amongst regional policy makers to redraft these documents to be consistent with the requirements of AB 939 and to position the County as leader in establishing a new vision for solid waste management.

P72.1

P72.1 Comments are acknowledged.

B. Los Angeles County ISWM Draft Summary Plan Deficiencies and Recommendations

Summary Overview

The Draft Countywide Integrated Waste Management Summary Plan fails to reflect the priorities and needs defined by the AB 939 statute regarding source reduction, recycling and composting. The plan also fails to present countywide programs of County coordination that reflect the priorities of waste management to the cities. The County does not lead the cities by example, and does not address waste diversion measures need to be achieved in the next decade.

The following is a breakdown of the Summary Plan deficiencies. The points of deficiency are cited followed by recommendations that could amend the particular area of inadequacy:

I. The Summary Plan Goals, Policies, and Objectives section is inadequate and does not reflect the hierarchy of AB 939 (Chapter 2)

Deficiency

The document does not reflect a commitment to the central principle of AB 939-- which is, alternatives should be exercised first and landfilling is the last option.

- The County's goals, policies and objectives do not reflect the spirit, intent, and means stated in AB 939. Emphasis should be placed on the hierarchy of waste management practices established by the bill, with landfilling as the last and least desirable method for waste diversion, and source reduction, recycling and composting as the favored methods.
- A lone mention of the hierarchy established in AB 939 is hidden away in a table discussing the role of the Solid Waste Task Force. The table mentions that in the task force's five-year review of the County Integrated Waste Management Plan (ColWMP), they "shall review ColWMP...to ensure that it remains consistent with the hierarchy of waste management practices defined in the Public Resources Code (PRC), Section 40051."

Deficiency

Excluding Goal #6 concerning disposal capacity, the language of the Goals, Policies and Objectives section is far too weak.

- The objective of Goal #6 is to "expedite, streamline and coordinate all permitting necessary to address disposal capacity need during the 15 year planning period." This applies only to landfilling. In contrast, the other goals addressing diversion and alternatives use weak action verbs such as "encourage," "assist," "develop," and "provide a forum for." Obviously, a stronger commitment needs to be made which outlines specific measurable and attainable goals and objectives.

Recommendation

All goals and policies for diversion strategies should contain measurable objectives designed to achieve maximum diversion, and a reporting mechanism for their objectives.

Deficiency

The Summary Plan still contains an objective to implement the 1988 Action Plan despite the fact that the Action Plan is inconsistent with AB 939. The new County Integrated Waste Management Plan is intended to replace all previous plans.¹

- The statement of policy for Goal #6 is that the County and cities of Los Angeles "will support the development of new disposal facilities and expansion of existing facilities identified in the Los Angeles County Solid Waste Management Action Plan adopted April 5, 1988." However, the Los Angeles County Solid Waste Management Action Plan is now obsolete.
- The goal of AB 939 is to only dispose of residual waste which cannot be reduced, recycled or composted, thus requiring only 15 years of capacity. The 1988 Action Plan was designed to provide 50 years of landfill capacity, which is not necessary under the newer mandate.
- The new documents required by AB 939, the Summary Plan and Siting Element, will completely replace prior policy and planning documents which include the 1988 Action Plan. The Summary Plan incorrectly notes that, "This [1988 Action Plan] policy may be amended by the adoption of the Countywide Siting Element."²

Recommendation

Revise Goal #6 to reflect that although the County and cities will support the establishment of County disposal capacity necessary for the 15 year planning period, the measures and strategies for siting new facilities are the last resort.

Deficiency

The Summary Plan does not cite specific targets for the alternative waste disposal plans or programs.

- The County needs to provide goals and clear plans to measure the annual progress of its programs. Alameda County's plan is very specific: "From source reduction and reuse, reduction of 4% by 1995 and 6% by year 2000. From recycling reduction of 34% by 1995 and 45% by 2000. From composting, reduction of 3% by 1995 and 9% by 2000." We need to learn from their example.

¹ Of which the Summary Plan is a part
² SP, 4-2

Recommendations

- Express the hierarchy of AB 939 on the first page of each document and thereafter where it assists in assessing priorities.
- Address source reduction, a priority of AB 939
- Revise objectives focusing on disposal.

Deficiency

There are no measurable targets or timelines for the goals, policies, and objectives mentioned in the document.

- Without measurable targets or timelines, no means are provided to measure progress. No reporting requirements or monitoring procedures are established to promote achievement of the goals and objectives.

Recommendation

Every recommendation should be accompanied by a measurable goal-timeline and reporting mechanism.

II. The Summary Plan fails to provide an appropriate vision of solid waste policy for the future. The plan focuses on obstacles to meeting the mandate, not the benefits to the LA community in achieving the goals. The document also ignores the methods used, as well as the successes achieved, by other communities faced with these same goals.

Comment

Emphasis needs to be placed not only on meeting the 50% recycling goal, but on re-engineering the entire solid waste policy towards environmental consciousness. Programs should be aimed toward resource conservation, environmental protection and encouraging the economic benefits of recycled goods and services.

Recommendations

- Every recommendation in the Summary Plan should be accompanied by a measurable goal, timeline and reporting mechanism.
- Revise sections dealing with the challenge of recycling to accurately reflect the activities and desires of the cities. (see page 8)
- Incorporate a vision goal similar to San Diego County: "To help ensure sustainability of our communities for present and future generations, and to conserve natural resources and landfill capacity the cities and county shall create an integrated waste management system..."
- The County will play a leading role in coordinating and implementing an integrated plan.

III. The 50% diversion goal of AB 939 is a minimum goal. The County should plan to top that goal by adopting LA City's goal of 70% diversion goal by 2020.

Deficiency

The 50% diversion goal is a minimum for AB 939. The bar must be set higher to encourage change and advancement. The Summary Plan should adopt goals that encourage progress, like LA City's diversion goal of 70% by 2020. Furthermore, it is unrealistic to assume that diversion will suddenly stop at 50% and not continue to increase over time.

The County should adopt the 70% goal of Los Angeles City for its unincorporated areas, and recommend its adoption by all cities (Los Angeles City also has a goal of 36% by year 2000). This commitment would lend support to the bans and simple policy measures recommended below.

The 70% goal assumes that 80% of yard trimmings, inert materials, wood, corrugated containers, tires and construction and demolition debris currently going to county landfills. Particular focus should be placed on recycling commercial organics such as the Community Recycling programs Ralphs and Vons sponsor.

Improvement could be made in glass, paper, and plastics recycling plans. Even County government recycling efforts in County departments could be greatly improved above the poor 5% goal currently served.

Recommendation

- Adopt explicit goals and embrace programs to meet a 70% diversion goal by 2020.
- Establish reporting and enforcement methods for the County, the largest employer in the county, to dramatically increase its own diversion activities.

IV. The Summary Plan's Goals, Policies and Objectives section does not address the specific needs identified by city Source Reduction and Recycling Elements. The programs for Countywide coordination of city efforts are greatly inadequate.

Deficiency

The goals, policies, objectives and programs for County coordination of the 88 cities do not reflect the priorities and needs of its critical cities (See SP 5-24).

- The Summary Plan merely summarizes the various Source Reduction and Recycling Elements (SRREs) of some major cities in Los Angeles County. The goals, policies and objectives do not address the priorities and needs identified by the cities, which include needs to site diversion Materials Recycling Facilities (MRFs), to develop rail haul facilities, and encourage the continued involvement and development of the private sector in waste management efforts.

- Chapter 2 merely lists the individual 88 cities' goals, policies and objectives for various diversion efforts in a table. The County claims it "consolidates those into a common list of goals, policies and objectives." It does not.
- These goals, policies and objectives of the Summary Plan must summarize the goals of the cities and provide critical policy guidance. The document must demonstrate clearly how the County plans to take a leadership role in ensuring full implementation of AB 939.

Deficiency

The cities of Los Angeles County have identified specific goals, policies and objectives that the County should focus on in order to advance diversion rates.

- For example, the County also refers to Christmas tree collection programs twice in the Goals, Policies and Objectives section when only 14 out of the 88 cities specify an interest in the program. This ratio remains virtually unchanged since 1992. While the program is a worthy project, it is insufficient in impacting diversion rates substantially and demonstrates the County's lack of focus and lack of substantial objectives.
- Although the following areas are identified by cities as priority needs, they are not addressed explicitly in the Goals, Policies and Objectives section or in programs of Countywide coordination.
 - **Regional Marketing** -- There are 64 cities who have a desire to do regional marketing efforts for recycled goods and materials. Chapter 5 only tackles some minor procurement efforts.
 - **Variable Collection rates** -- 65 of the 88 cities policies and objectives want it (Table 5-2). Los Angeles city has essentially introduced a version of a variable rate as part of the vote to close the Lopez Canyon landfill in November, 1995.
 - **Regional Recycling/Materials Recovery Facilities** -- 44 cities have this as a specific goal or objective.
 - **Regional Composting Facilities** - 44 cities have deemed Regional Composting Facilities as necessary implementations.
 - The County urgently needs to examine success stories from elsewhere. San Jose, a city with a population of 800,000 people, composts 96,000 tons of waste a year (25% of their waste stream). This contributes to their 47% recycling rate.

Municipal Compost Facilities -- 24 cities have or desire to have municipal size composting facilities.

- **Landfill capacity conservation** -- This refers to measures to extend the life of landfills by using different types of top cover or landfill mining. This should be the first place to address the so-called "disposal crisis." 23 cities have already noted a wish to set action in conserving capacity at existing landfills (see above).
- **Construction Demolition Debris** -- 49 cities would like to see efforts to change the current handling process of construction and demolition debris.

Recommendations

- Establish goals, policies and objectives that include both efforts for Countywide coordination and reflect the needs and priorities of the 88 cities in the following areas:
 - Variable collection rates
 - Regional recycling/materials recovery facilities (MRFs)
 - Regional and municipal composting facilities
 - Landfill capacity conservation measures at all County landfills
 - Regional market development
 - Source reduction measures
 - Countywide public education efforts
 - C&D disposal in inert landfills
- Establish target goals and specific objectives for diversion. For example, a specific goal would be to state that the County will assist jurisdictions to site three regional composting facilities within the next decade.

V. Although the cities have identified it as a significant goal, the development of regional policies and programs is not addressed in the Summary Plan document.

Deficiency

Although the Summary Plan notes that many of the cities have "stated goals, policies or objectives that address working together cooperatively with other jurisdictions..." to implement the programs developed in compliance with AB 939, the document itself does not reflect any plans of integrating regionally cooperative policies or programs. Already, 54 cities have policies of regional cooperation and 63 cities have policies addressing regional marketing efforts.

A regional approach to waste policy is essential. As regional policies have been the solution to other issues such as water, communications, transportation infrastructure, clean air and law enforcement, waste management should not be an exception.

However, throughout the Summary Plan and Siting Element, the County adopts an inside-the-County-line mentality as if other jurisdictions were insignificant to the success of AB 939. Although there is one goal dealing with the removal of barriers between jurisdictions, the objective is weak in merely stating that the County plans to "continue the existing periodic interjurisdictional solid waste meetings."

The example of the Southern California Association of Governments in developing regional solid waste policy is exemplary, as is the example of the San Gabriel Valley Association of Governments.

Jurisdictions can benefit from the advantages of other jurisdictions for different parts of the waste management system. A new forum is needed to broaden participation in the implementation process.

Recommendations

- Include a specific goal to pursue regional, multi-county solid waste policies and programs that strive to achieve the goals of AB 939. Identify barriers to regional cooperation and systematically remove them.
- Form a regional task force that will design a regional waste plan for the four County areas (San Bernardino, LA County, Orange County and Riverside) composed of representatives from the cities, counties, and independent and public experts.

VI. The recycling performance of the County unincorporated area and in County agencies is poor: the County must ensure that a 50% diversion is achieved within its own jurisdictions to lead by example.

Deficiency

The unincorporated area comprises only 12% of the County population, it produces 20% of the total waste stream. The diversion programs of the areas are directly under County control, so these percentages must be dramatically improved if the County is to reach the 50% reduction mandated by state law.

There are numerous facilities, programs, unincorporated areas and county departments through which the County has the ability to lead by example. Furthermore, individual jurisdictions can benefit by County leadership to ensure that state, federal and regional agencies also divert at 50%.

In Chapters 2 and 5, the County needs to delineate the specific actions where it has clear jurisdiction. The County also needs to establish real targets and implement regular reporting procedures.

Recommendations

- The County needs to take action within its own department and within programs of Countywide coordination to set an example in meeting the AB 939 mandate.

- There should be a regular procedure of reporting the progress of real, measurable targets to Supervisors. These include, in order of ease of implementation:
 - Composting or land apply all sewage sludge
 - Source reduction efforts by County agencies
 - Increasing procurement by County agencies
 - Improving the County buy-recycled program
 - Increasing the profile of County drop-off centers
 - Recycling of all County tires and those brought to County landfills
 - Better use of County mechanisms to encourage diversion, e.g. mixed paper and yard waste need full implementation
 - Improving the Recycling Market Development Zone
 - Improving County mixed waste processing at landfills, including the planned MRF at Puente Hills
 - Ensure rail haul project at Puente Hills is brought to fruition
 - Conduct annual waste composition studies; produce quarterly reports, such as that produced for the 1988 Action Plan; assign quantifiable goals for reduction
 - The County portion of waste stream should be quantified and reduced accordingly, in order to lead by example
 - The County should reinstate the special program for the handling of earthquake debris at Calabashes landfill to shore up efforts to recycle C&D (construction and demolition)

VII. The Summary Plan fails to plan for necessary measures to increase diversion countywide, such as implementing Mandatory Recycling Ordinances (MROs).

Comment

The Summary Plan does not address the issue of Mandatory Recycling Ordinances. Ordinances that would set mandatory recycling requirements within the county. The document also neglects data submitted by cities in support of these issues. MROs are critical in meeting the mandate of AB 939 as implementation has already been proven to be considerably successful throughout the country in reducing waste generation.

Deficiency

The California Integrated Waste Management Board reported in 1992 that 16 states had yard waste bans (Arkansas, Florida, Illinois, Iowa, Massachusetts, Michigan, Minnesota, Missouri, New Jersey, North Carolina, Ohio, Pennsylvania, Texas, Wisconsin and Wyoming). Even the San Diego County Siting Element and Summary Plan (page 5) have a specific yard waste ban component and a specific goal: San Diego aims to have 7% by 1995 and 14% by the year 2000 of its total diversion come from bans on yard wastes.

- The County claims in the Siting Element that "generally haulers dispose of inert material in unclassified landfills due to lower tipping fees." However, a ban can significantly increase Class III landfill capacities (Siting

Element, p. 1-7, Sec. 1.3.2.2). There are already 98 years of capacity at inert landfills.

- By banning disposal of certain materials such as cardboard, construction debris and yard waste in Class III landfills, an estimated 37.2% of the waste stream can be diverted.

Recommendations

- The County should seek cooperation from the cities to phase in the following Mandatory Recycling Ordinances over next five years:
 - Inert material and C&D debris bans starting from the end of 1996 (in boom economic times, up to 30% of the waste stream can be from C&D debris)
 - Tire disposal bans starting from the end of 1996
 - Wood waste bans starting in 1998
 - Corrugated paper bans starting in 1998
 - Yard and green waste bans starting from the end of 1998

VIII. The Summary Plan fails to plan source reduction and waste prevention programs - the highest priorities of AB 939.

Deficiency

Source Reduction/Waste Prevention measures are the first priority under AB 939. However, they are under-emphasized in the Goals, Policies and Objectives of the Summary Plan, despite the cities' effort and desire to establish such measures and policies (such as variable rates).

According to the California Waste Management Board, given the low capital expenditure involved, waste prevention is "often the least expensive method per unit of diversion" [May 1995, Ensuring Adequate Disposal Capacity, CIWMB].

The California Integrated Waste Management Board has cited the cities of El Cerrito, Berkeley, and the counties of Sonoma and Alameda as good examples of source reduction, with their specific 6-10% diversion goals. Nearer to home, San Diego has a specific 5% countywide percentage goal for source reduction by the year 2000.

Currently, only one activity for Countywide coordination aimed at source reduction exists: the grasscycling effort, and there are no measurable diversion goals or reporting mechanisms noted for this strategy.³

LA County, reportedly, is still only "studying" the introduction of variable rates for unincorporated areas, despite the fact that this strategy is identified in the County's 1985 Solid Waste Management Plan.

³ SP. 5-45

Recommendations

- Outline the specific waste prevention and reduction goals of the Summary Plan
- Adopt specific source reduction/waste prevention objectives and reporting mechanisms for the Summary Plan

IX. The Summary Plan lacks clear goals, policies and objectives to stimulate markets for recyclable commodities collected in the County, despite the fact that markets are key to the success of diversion programs instituted by all localities within the County.

Deficiency

The Summary Plan does not state how the County will coordinate data collection on local market opportunities and prices, so that each city does not have to collect the same information on its own.

Recommendation

County staff should assist cities in identifying markets for their collected materials and understanding price trends and issues, either through County data collection efforts or through facilitation of information sharing mechanisms with cities.

Deficiency

The Summary Plan does not provide specific information on procurement efforts that the County will undertake to stimulate demand for recycled products through its own purchasing practices, nor steps the County will take to measure progress and share information on procurement opportunities with cities.

Recommendation

The County should set measurable procurement goals and report regularly on achievement of recycled product purchasing practices, as well as detail steps it will take to disseminate information regarding recycled product specifications, prices, and availability with jurisdictions within the County.

Deficiency

The County's Recycling Market Development Zone (RMDZ) is undeveloped in comparison to other RMDZ's, lacks measurable goals and coordination with County solid waste policy, and, despite the opportunity to support AB939 diversion goals, is not sufficiently highlighted within the Summary Plan as a County program.

Recommendation

The Summary Plan should articulate the role of the RMDZ in stimulating markets for recyclable commodities collected within the County, indicate how measurable goals will be set for the zone, and clearly define the mechanisms by which RMDZ activities will be coordinated with County diversion efforts and reported on in solid waste status reports to the County Board of Supervisors.

X. The Summary Plan needs to restructure the JSWM Task Force and create a forum for the cities of the County.

Deficiency

The current task force is not broadly representative enough of the stake holders in the waste management arena to develop a comprehensive vision for Los Angeles County.

Comment

- The current document displays obvious limitations of the current task force. The task force is not entirely representative of the community while lacking credible environmental organizations' participation and offering little leadership in reshaping the proposed plans.
- Reconstitute the existing Task Force to reflect the need for dramatic waste stream reductions in LA County by defining their roles to be active and progressive in implementing the mandate of AB 939.

Deficiency

Coordination between the cities and the ISWM task force is greatly lacking.

- One possible approach is to group all the cities into sub-regional groups to provide a local forum for input on local and regional needs. Also, some regions face common problems and can thus work collaboratively together. Other cities have transfer facilities, MRFs or composting facilities that can be shared with cities that lack them. Sub-regional groupings fashioned after the SCAG model would facilitate implementation of a truly integrated plan.
- In the preparation of a truly Integrated Waste Management Plan, it is essential that all 88 cities be able to participate, and that the County provide a meaningful leadership function. The current model merely collates the SRREs and implements selective programs in an ineffective system. A broader, more representative forum is needed to coordinate countywide efforts

Recommendation

It is imperative that the County meet with city waste management and recycling representatives in open meetings to establish how to best fund, publicize, and implement countywide programs that assist all parties in attaining recycling and source reduction goals.

XL Funds collected by the County for pursuing AB 939 implementation are not well used. Access to the funds by the cities is also inadequate.

Deficiency

The plan provides no sense of where the money goes. Public Works should include a budget breakdown as Alameda County does to not only increase accountability and

confidence, but allow decision makers to redirect efforts to priority areas as they deem appropriate.

The County has a funding source that is not shared with the cities in a significant way. Funding should be apportioned according to priorities of AB 939, with minimal amounts going toward disposal.

Recommendation

Include a budget breakdown in the document and focus on the efforts concerning the different areas of the waste management hierarchy. Detail specific programs and budget items that reflect the hierarchy and create a forum in which funding uses for the planning period are discussed.

C. Los Angeles County ISWM Draft Siting Element Deficiencies and Recommendations

Summary Overview

The Draft Siting Element fails to meet the requirements of AB 939. It does not present a comprehensive assessment of disposal need for the County, it underestimates disposal capacity and the disposal strategies lack adequate diversion and other measures for the 15 year planning period. The report utilizes the outdated 1988 Action plan as its basis, and fails to consider regional disposal options beyond the county lines.

I. The Draft Siting Element neither fulfills the specific requirements as found in AB 939 and relevant regulations, nor the broader purpose of providing policy guidance to decision makers about waste disposal options.

Comment

The purpose of the Siting Element is to show how the County can safely dispose (or transform) of waste which *cannot* be source reduced, composted or recycled for the 15 year planning period of 1995-2010, and whether any new disposal sites or other strategies are required to meet this goal.⁴

In contrast, the Draft Siting Element merely proposes to landfill half of the waste produced by the County by building new landfills and expanding existing ones.

Deficiency

The Siting Element is fundamentally deficient in not properly addressing the issue of how much waste cannot be source reduced, composted or recycled

- In both the Siting Element and Summary Plan the County assumes LA County will stay at 50% diversion from the year 2000 as required by AB 939, and will not divert more waste after that date. The 50% is meant as a minimum goal under the Statute. Los Angeles City has adopted a goal of 70% diversion by 2020; this goal is feasible for the entire County.
- Both the Summary Plan and Siting Element should address the issue of what waste cannot be source reduced, composted or recycled or transformed. The Summary Plan should address missing goals for source reduction in reducing the waste stream, while the Element should address transformation technologies which are entirely missing.
- In addition, assumptions about how much waste will be generated is key to assessing disposal needs, and it is likely that the County has exaggerated the growth of waste generation in the future.

⁴ CAR, Title 14, Sec 18755.3

- An independent analysis prepared by Gershman, Brickner and Bratton, Inc. (GBB) of Falls Church, Virginia suggests that LA County does not need additional disposal capacity in the County for the 15 year planning period (See Summary Plan Deficiencies above) or through the second planning period of 2010-2025, given a mix of enhanced diversion activities and revised calculations of waste generation and waste export, landfill conservation measures etc.

Deficiency

The County incorrectly interprets AB 939 to require 15 years of disposal capacity which must be built exclusively inside the County line. The Siting Element is misdirected at building capacity rather than pursuing integrated strategies to provide for disposal capacity.

- A second fundamental deficiency is the County's faulty interpretation that 15 years of disposal capacity must be found exclusively inside the County line. The County claims "As indicated in Subsection 4.6.1, the CSE's Primary goal is to secure in-County disposal capacity" p.4-23, Sec 4.6.3). This is a false statement inconsistent with the Statute or implementing regulations.
- Throughout the report the County ignores or downplays disposal already taking place in adjacent counties, or the potential of remote rail haul sites. This artificial limitation distorts the analysis and findings of the report.
- Indeed, under CCR Sections 18755 (c) and 18756.5 the Siting Element may explain why there are no suitable new sites for disposal because of economic, environmental, fiscal, legal physical, political, or other factors (see below).
- If no new or expanded facilities can be identified because of various obstacles, then the Siting Element is allowed to show how a County or region intends to dispose of wastes and may present strategies for how 15 years of disposal capacity will be assured.⁵ The Siting Element only admits in one place the role of other strategies in addition to the to the in-County strategy alone.⁶

Deficiency

The Siting Element (and Summary Plan) fail to provide disposal strategies consistent with the hierarchy of AB 939, where building new landfills is a least preferred option for providing for disposal capacity.

⁵ The Siting element does not expand on the single statement "the planning process should include a variety of alternatives...this may include increased recycling and other diversion efforts, as well as infrastructure for out of County landfill disposal" (p. 4-26, Sec 4.7)
⁶ The "Purpose of CSE... is to provide a planning mechanism to address solid waste disposal capacity need ...for each year of the 15 year planning period, through a combination of existing facilities, expansion of existing facilities, planned facilities, and other strategies" - emphasis added Siting Element, 1-2 Sec. 1.2)

P72.3 P72.3 Please refer to "Review Comments and Responses to the GBB Report" in Appendix I-D of the Final Draft CSE, volume II, Appendix 1A-1D.

P72.4 P72.4 Please refer to Topical Response #3, in-County versus out-of-County disposal capacity.

P72.5 P72.5 Please refer to Topical Response #1.

- A third key deficiency is the County's implicit interpretation of the Siting Element as a landfill building program detached from the demands of the hierarchy of AB 939.
- A more valid interpretation of Statute and regulations would be that new landfills should be identified for development in the planning period only if there is insufficient capacity available for the County (inside or outside the County) after every effort has been made to source reduce, compost and recycle.
- The CIWMB has created a set of priorities for meeting disposal needs and ensuring landfill capacity that stresses the hierarchy of AB 939 and takes a more integrated regional rather than County approach:
 - maximize waste diversion (source reduction, composting, recycling)
 - Landfill cover measures (to conserve space)
 - Landfill mining (recovery of materials from landfills, reduction of landfill volume through baling, compacting, etc.)
 - Bans on inert materials reaching Class III landfills
 - Bans on additional materials (Mandatory Recycling Ordinances)
 - Transformation (e.g. wood waste, tires)
 - Expansion of existing landfills before new construction
 - Examine feasible new landfill construction in the County
 - Waste exports (identified as a short term solution to meet needs or long term) to nearby and distant Counties via road and rail haul.

P72.5

P72.5 (cont'd)

- This hierarchy would produce a very different Siting Element, since it recognizes the imperative codified in the Statute that the building of a new landfill is the least preferred waste management method that should be avoided.⁷

Recommendations

- Approach the Siting Element from the perspective of providing strategies and options to meet disposal needs, instead of a rigid 15 years of landfilling capacity in the County.
- Establish a strategy for disposal in the Siting Element and Summary Plan that reflects the hierarchy of AB 939 in line with the CIWMB hierarchy. Under this approach expanding sites or building new capacity in the County are only the latter steps of the strategy if all other options are exhausted such as increased diversion.
- Remove the emphasis on disposal capacity solely inside the County line:

⁷ Ensuring Adequate Disposal, May 20, 1994

- AC language in the goals, policies and objectives section similar to the San Diego Plan.
- "The Countywide Siting Element provides a description of the facilities and strategies that will provide adequate disposal capacity for 15 years for all jurisdictions within the county when other alternatives such as additional waste diversions programs and waste export are included." (p.1) [emphasis added]

II. The new landfill shortage of 1999 is based on a new higher waste generation estimate that does not use the most accurate data for LA County, and the assumption that the daily permitted capacity at each landfill is fully used.

Deficiency

The high waste generation projection found in the Siting Element is excessive and not based on the best available data for LA County.

- The Siting Element makes the case for a shortage of landfill capacity in the County, and on this basis advocated a huge expansion and building program for landfills inside the County line (see below). However, predictions by LA County Public Works of coming landfill shortages have been consistently wrong for the last 18 years. The 1988 Action Plan, for example, foresaw landfill shortages by 1992 that never occurred nor has any shortage occurred since.
- The Siting Element estimates that permitted Class III landfill cannot meet projected waste disposal need by 1999 and therefore a "garbage crisis" currently exists in Los Angeles County.⁹ According to the table provided, there could be a shortage of 4,600 tons a day of daily (landfill) capacity.¹⁰ Also another date is provided called the "time to crisis", projected for the year 2007 when disposal needs exceed the remaining permitted landfill capacity.¹¹
- The County uses the CIWMB adjustment methodology for estimating waste generation. The methodology is very sensitive to the data used for population, employment, taxable sales and consumer price index and the overall economic growth projections. Public works seems to have modeled using some less accurate data provided by CIWMB as default when other data does not exist which has inflated waste generation.
- In contrast to the County assumptions, per person (per capita) waste generation is decreasing based on EPA studies and a CIWMB Disposal Capacity Study have demonstrated. New state Finance Department figures

⁹ SE, *ibid*: p.4-18, Sec.4.5.2.2

¹⁰ SE, *ibid*: Table 4-6, p.4-21.

¹¹ SE, *ibid*: p.4-17, Sec.4.5.2.3; p.4-22 Sec.4.5.2.4

show less than expected population growth due to a migration out of the County compensating for immigration into the County. Also the effect of taxable sales of autos, personal services and second-hand merchandise in the County inflates waste generation numbers without in fact generating any waste; and need not be included in the model according to CIWMB.

- When such L.A. County specific data is used in the State methodology a lower waste generation curve is created that adds several years to the "time to crisis" and greatly reduces the size of any subsequent disposal shortfall.
- Waste generation estimates must be treated with caution because major resource allocations and key decisions about disposal capacity will be determined by them. A range of possible waste generation curves which are based on the best data for Los Angeles should be provided to decision makers. The plan only presents two options -- massive landfill shortages and massive excess capacity.

Deficiency

The County time-to-crisis date is artificially shortened by assuming each landfill is filled to maximum daily permitted capacity, which is rarely the case.

- The crisis date of 1990 also rests on another key assumption concerning the rate at which existing permitted landfill space will be used up. The County's "time to crisis" calculations assume each landfill is filled at its maximum daily permitted (allowed) rate; everyday.
- However, actual disposal measured at landfill sites shows they are rarely filled at the maximum daily rate and most landfills receive less than the daily permitted capacity. Therefore the use-up rate of existing landfills will be less, delaying the date of any landfill shortage.

Recommendations

- Revise the waste generation projections using modeling with LA County specific, financial, population, employment, taxable sales data.
- Based on the best LA specific data, provide a range of waste generation curves to provide a more accurate picture to decision makers.
- Base "time to crisis" calculations on the actual disposal rate at each site, not the theoretical maximum (daily permitted capacity).

III. The County presents only two extreme "time to crisis" scenarios which does not provide a useful analysis of whether, how much or where additional disposal capacity should be sought.

Comment

P72.6 (cont'd)

P72.7 P72.7 Please refer to the "Review Comments and Responses to the GBB Report", in Appendix I-D, Volume II of the Final Draft CSE.

P72.8 P72.8 Please refer to Topical Response #9.

P72.9 P72.9

The Siting Element provides only two "time to crisis" scenarios (A&B) as guidance for assessing disposal capacity needs and policies for the County for the 15 year planning period. They both rest on the new higher waste generation curve provided by the County as discussed above.

Scenario A, assumes no new landfills or expansions of existing landfills and indicates shortages in the 1999-2007 time frame. However, Scenario A is based on the hidden assumptions including no net exports of waste to other counties or to remote sites and no further waste diversion than the 50% mandated by law. Under these circumstances Scenario A shows a landfill shortage as early as 1999. Scenario A is highly unlikely to occur.

Scenario B, assumes four new landfills are built and six landfill expansions completed in L.A. County. Scenario B shows a huge surplus of landfill space that varies from 11,500 tons a day to 67,000 tons a day -- the latter twice as much as the current amount of trash generated each day in Los Angeles. Scenario B is also highly unlikely to occur and represents a polar extreme of Scenario A.

These "all or nothing" scenarios have little value as guidance for policy makers. There is a need to elaborate numerous scenarios that either fall between the two extremes or are based on more comprehensive assumptions.

Recommendations

- Present additional time to crisis scenarios based on additional diversion and disposal assumptions, to determine the minimum, if any, new disposal capacity needed in or outside the County. Increased diversion strategies should also be in the ISWM Summary Plan
- Scenarios could be based on the following waste management strategies (see Summary Plan Deficiencies above):
 - expanded diversion goals e.g. 70% by 2020 for the County unincorporated area and the eighty-eight cities.
 - impact of current and expanded waste export to Orange County
 - moderate rail-haul capacity becoming available in the planning period
 - inert materials ban (redirect inert materials to proper landfills)
 - mandatory recycling ordinances (MROs)
 - increased landfill conservation measures - alternatives daily top cover
 - diversion of sewage sludge from Puente Hills
 - waste prevention/source reduction (e.g. packaging bans) impact on waste stream

IV. The Siting Element advocates an unprecedented expansion of disposal capacity inside L.A. County, but does not show credible strategies for achieving it, since all proposed new landfills face insurmountable obstacles.

P72.9 (cont'd) P72.9 Please refer to Topical Response #9.

P72.10

Comment

Even if it were assumed that there is a need for new and expanded landfills inside the County line as the County claims, the County has not presented a credible strategy for creating the capacity.

Indeed, under CCR Sections 18755 (c) and 18756.5 the Siting Element may explain why even if there is a need for disposal capacity, there are no suitable new sites for disposal because of economic, environmental, fiscal, legal physical, political, or other factors (see below).

The sites identified for new landfills by the Siting Element certainly face significant land use, political obstacles and environmental and public health impacts which the County does not recognize.

The road access problems to the proposed Blind and Towsley Canyons are recognized only in the Element.¹² The document fails to note that the EIRs for both sites are not as yet certified.

The obstacles to new in County disposal/landfill sites advocated in the report include:

- **Towsley Canyon** - Adjacent jurisdictions oppose, access denied by land purchase by SMMC. Opposed by Supervisor, LA City.
- **Mission-Rustie-Sullivan** - Hostile jurisdictions including Los Angeles, opposed, opposed by supervisor, LA City.
- **Elsmere Canyon** -- Sustained opposition since 1972? and "no-project" advocated by US Forest Service which is responsible for land exchange to allow landfill in Elsmere Canyon. Hostile jurisdictions. Opposed by Supervisor. Federal law now prohibits use of this canyon as a landfill.
- **Blind Canyon** -- Local opposition. access denied by land swap by Bob Hope. Opposed by Supervisor. Hostile jurisdictions.

Moreover there are significant obstacles to most of the proposed landfill expansions at Sunshine Canyon, Chiquita Canyon and Puente Hills.

In June 1996, the LA City Council voted a resolution to remove three sites from the Siting Element; Blind Canyon, Mission-Rustie-Sullivan and Towsley Canyon (and Lopez Canyon, scheduled to close in 1996).

Given the potentially insurmountable obstacles to building new landfills in LA County it is prudent to examine other options and strategies for LA County into the future.

Recommendations

¹² Siting Element, p1-14, Sec. 1.4.2.4

- Make a determination of a range of likely additional landfills for the County in the planning period and beyond, based on different scenarios.
- Each potential disposal site inside or outside the County should be ranked and compared by factors such as the degree of completion, obstacles, environmental impacts, and health impacts and assessed for feasibility, cost, likely date of permitted capacity and other considerations.
- A prudent planning assumption should be made that new landfills in the County are unlikely and plan accordingly. As such it should explore alternatives strategies, including out of County and advanced diversion options to meet any excess disposal need in the planning period.

P72.10 (cont'd)

V. The County describes rail haul to remote landfills negatively and as only a "supplement" to extend the life of in-County landfills. Instead of evaluating rail haul as an equal partner in a waste management strategy for the future

Comment

The County includes a chapter on rail haul to remote sites, but only includes one goal saying rail haul will be promoted but only "in order to *supplement and extend* the life of in-County disposal capacity".¹³ This is inconsistent with AB 939 and the implementing regulations, since exports may be a key component of any disposal strategy and can *replace* it.

The Siting Element, as do most observers, does recognize that rail haul is an "essential element in the long-term solid waste disposal strategies for Los Angeles County," but this theme is not elaborated.¹⁴

In contrast, Chapter 8 on rail haul recounts numerous disadvantages and obstacles to rail haul options and provides mainly a negative assessment. Yet the Siting Element does not equally address the significant obstacles to new in-County disposal (see above). Indeed rail haul sites are in most cases more feasible and nearer completion than new landfills inside the County line.

However, neither time to crisis scenario provided (see above) allows for the impact of any range of waste export or rail haul capacity coming on line in the planning period to 2010.

The documents must make export and rail haul an equal partner in ISWM system and use it to generate further disposal scenarios, and the document must also address methods to make rail haul accessible, affordable and successful.

Recommendations

¹³ SE 2.4.6, p.2-6.
¹⁴ SE p.1-10, Sec.3.5

P72.11 Please refer to Topical Response #5 and #10.

P72.11

- Evaluate rail haul as an equal partner in the waste management system and not subordinate it to development of in County disposal capability.
- The section on the disadvantages of rail haul section should be fairly weighed against disadvantages of developing further in County sites.

P72.11 (cont'd)

VI. The contribution of current out of County exports and future rail haul of wastes to remote sites are not included in the assessment of disposal need, and this exaggerates the "time to crisis"

Comment

There are currently five major rail haul projects being developed for implementation beginning in the year 1997, and the planned capacity of all projects is enough to handle LA County's waste stream. There is currently a permitted rail haul capacity from LA to Utah. Even a single project at a low initial capacity in the next 15 years would make any new capacity in the County probably unnecessary for the 15 year planning period and beyond.

However, no rail haul capacity or net export is assumed by the County to be available in the planning period to 2015, and none is included in the two time to crisis scenarios provided. The artificial exclusion of out of County disposal in the time to crisis scenarios exaggerates the time to crisis, and helps the Element make the case for a huge in County landfill building program.

The Siting Element also ignores the existing waste being exported to Orange County. Contracts for export to permitted capacity in Orange County began in early 1996, in addition, waste is exported to other locations, such as El Sobrante in Riverside County. Orange County has at least 30 years of landfill capacity and will be a significant factor in any coherent disposal strategy for LA County.

Under the hierarchy of AB 939 it would be more preferable to access existing landfill sites in adjacent counties rather than site new sites in the County. Similarly most rail haul sites are less environmentally sensitive than proposed new in County sites and are therefore a better alternative; this was recognized by EPA in recent comments on the DEIR for Elsmere. This supports the view that implementation of AB 939 and provision of disposal capacity must be seen in a regional context and not purely inside the County line.

The Siting Element does suggest that rail haul will be a necessity for the County in the future *even if all* proposed sites are developed in County. But the document fails to draw the conclusion that it is prudent to act to test and acquire that capacity as soon as possible and avoid building further landfills in the County.

Recommendations

- Provide an analysis of the implications of current and future out of County disposal options in the planning period, including both road and rail haul and waste exports to adjacent counties

P72.12 Please refer to Topical Response #3 and #5.

P72.12

- Include current waste exports to Orange County in the time to crisis scenarios presented.
- Include in a time to crisis scenario a range of rail haul capacity that would avoid new landfill sites in L.A. County.
- Elaborate goals, policies and objectives to ensure that rail haul capability is tested and available to L.A. County and the region.

P72.12 (cont'd)

VII. References to the 1988 Solid Waste Action Plan must be removed from the Siting Element since the Action Plan contradicts the intent and requirements of AB 939 and could undermine its implementation; also the Siting Element and other AB 939 policy documents will replace existing policy documents such as the Action Plan.

Comment

The Siting Element continually fuses the 1988 Action plan objectives with those of the Siting Element. The Siting Element states, for example, that "These goals are consistent with those listed in the Action Plan discussed in Chapter 1, Sections 1.4.2 of this document and are *hereby made part of the Goals and Policies of the CSE.*"

The report claims "the situation currently facing the County is *no different today than it was in 1988.* To ensure protection of public health and safety, the jurisdictions in Los Angeles County must provide for the disposal needs of their residents through in County facilities, *if feasible.*"¹⁵ [emphasis added] Nevertheless much has changed in policy, programs and technologies, including the advent of AB 939 one year later.

The draft refers to programs that satisfy both Siting Element and 1988 Action Plan, however, there is *no* requirement that the Siting Element must be consistent with the Action Plan or vice versa, since the Siting Element, Summary Plan and other planning documents for AB 939 (collectively the Countywide Integrated Waste Management Plan) will *replace all existing policy documents* including the 1988 Action plan. --

The 1988 L.A. County Solid Waste Action Plan adopted April 1988 was to "develop 50 years of permitted in County solid waste disposal capacity to be held in public ownership..."¹⁶ The plan envisaged minimal recycling and contained no waste prevention goals, and was swiftly overtaken by the passage of AB 939.

The actual pursuit of 50 years of landfill capacity with public investment in the County would divert resources from objectives of waste prevention, recycling, composting etc. which are priorities under AB 939.

Therefore, the Action plan is inconsistent with and undermines the new plans and the purposes of AB 939. All references to the Action Plan other than as a historical footnote or background and must be removed from the Siting Element.

P72.13

P72.13 Please refer to Topical Responses #13.

¹⁵ SE p.4-23, Sec.4.6.1
¹⁶ p.4-22, Sec. 4.6.1.

Recommendations

- Remove all references to 1988 Solid Waste Action Plan as any other than historical footnote. The Siting Element and Summary Plan documents required by AB 939 supersedes the old waste planning documents and policies.
- Acknowledge there is no requirement to provide 50 years of in-County landfill by AB 939, only 15 years of disposal capacity or strategies for the County inside or out.
- Recognize that pursuit of this 50 year goal as a primary policy goal contradicts and is incompatible with the priority emphasis given to waste prevention, recycling and composting by State Law.

VIII. The Siting Element contains no policies or plans to assist the development of new transformation technologies or other landfill disposal alternatives such as composting, etc.

Comment

The Siting Element has no assessment of the new transformation technologies under development in L.A. County. The Siting Element is meant to show how the County will dispose and transform wastes that cannot be diverted.

The Summary Plan recognizes that "Although transformation technologies has proven to be commercially, technically, and environmentally feasible while at the same time meeting stringent air quality standards, the development of additional... facilities in Los Angeles County during the 1996-2010 planning period is unlikely."¹⁷

However the reasons given are not convincing, focusing on current conditions and prices in the energy markets. The plan is therefore unjustifiably pessimistic about transformation capability and the County must make an effort with the cities to support it.

One of the most promising transformation technologies being developed by Southern California Edison (SCE), the AIR gasification Project which turns organic wastes into useable gas for energy. However, L.A. County Public Works has shown little interest in the AIR Project.

Recommendation

- During the Planning period it is prudent to assess and assist the development of feasible mid-to long term transformation technologies to ensure that decision makers have a range of options in the next century for handling solid waste.
- The County should assist SCE toward the goal of a demonstration project starting at 50 tons a day by 1999 and then to 300 tons a day by 2003.

¹⁷ Summary Plan, 4-2

P72.13 (cont'd)

P72.14

P72.14

Please refer to Topical Response #14.

IX. The Siting Element fails to emphasize the importance of measures to preserve existing disposal capacity.

Comment

Methods for the preservation of landfill capacity are entirely neglected by the County in the Siting Element. These methods include landfill mining, baling and shredding of waste and use of alternative daily foam covers that save space in the landfill.

These are considered a legitimate method in any strategy to ensure landfill capacity by a County according to CIWMB, and are higher up the hierarchy of strategies than expanding landfills or building new landfills (see above). These represent immediate measures that can be pursued by the County to ensure landfill capacity.

For example, Antelope Valley landfill will introduce foam top cover as a test of the technology. This is a welcome start to a program that should be expanded across the County, in line with a phase-out of greenwaste as alternative daily cover.

Recommendation

- The County can implement these measures in its landfills and require them at private landfills. These measures include:
 - Chemical Foam Cover and Tarp Intermediate cover, instead of grass
 - Waste Compaction (reduces volume by 25%)
 - Shredding and Bio-stabilization (reduces volume by 50%)
 - Baling (reduces volume 40%)
- Landfill mining, the extraction of materials from landfills, is also recommended for the future

P72.15 P72.15 Please refer to Topical Response #2 and #14.

X. Excessive Landfill Need Scenario

Deficiency

The Siting Element implicitly advocates four new landfills and expansion of all Class III landfills in LA County as a result of its reliance on only two scenarios as a specific goal despite their own calculations that show a large excess of disposal capacity results

Goal 2.4.1. concerns the development of disposal facilities, and under the policies list says the County will "expedite, streamline and coordinate" the building of four new landfills and expansion of nine others Class III. This goal is written without reference to actual disposal needs identified for the County.

The building program leads to a huge excess of disposal capacity over the planning period according to Scenario B. Moreover, the landfill building program implicit in this goal will have detrimental effects on diversion, since it

P72.16 P72.16 Please refer to Topical Response #1, #9, and #10.

would take away County resources which should be focused on the priority under AB 939 of maximizing waste diversion Countywide.

Recommendations

- Revise to articulate a goal of securing only disposal capacity that is absolutely necessary after maximizing diversion, conserving landfill space and using existing sites outside the county and other available strategies.
- Move up goal 2.4.4 which states as a purpose of the Element "To reduce the volume (tonnage) of solid waste requiring disposal/transformation through source reduction, recycling, composting, and public education."

P72.16 (cont'd)

The Alliance For Innovative Resource Management

October 21, 1996

Harry W. Stone, Director
LOS ANGELES COUNTY PUBLIC WORKS DEPT.
900 South Fremont Avenue
Alhambra, CA 91803

Attn: Mike Mohajer
3rd Floor Annex

Re: ADDENDUM to Comments on Draft Countywide Siting Element & Summary Plan

Dear Mr. Stone:

On October 17, 1996, the Alliance for Innovative Resource Management (AFIRM) delivered to your office, comments on the Draft Los Angeles County Countywide Siting Element and Summary Plan of the Los Angeles County Countywide Integrated Waste Management Plan, January 1996.

In collating this document for delivery, the 28th and final page of comments was inadvertently left out of the package to you. We have therefore enclosed it herewith for inclusion in the administrative record.

We would very much appreciate your accommodation of this request to submit these additional comments for inclusion in the administrative record. Please contact our consultant, Mike Lewis, at (909) 612-5707, if you have any questions. Again, we thank you for the opportunity to submit these comments.

Sincerely,



William B. Hulse, Jr.
Regional Coordinator

RECEIVED
OCT 22 1996
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL PROGRAMS

"not worthless waste -- but a valuable resource"
11377 West Olympic Blvd. Suite 1111
Los Angeles, CA 90064

D. Legal Sufficiency of an "In-County" Disposal Plan

The County should recognize that its plan for only in-county disposal capacity has a serious legal flaw: it may be unconstitutional. On May 16, 1994, the Supreme Court of the United States examined the constitutionality of a local agency directing haulers to use a local transfer station for solid waste. In a majority opinion by Justice Kennedy, the Court pronounced a Clarkstown, New York, ordinance requiring the use of a local transfer station unconstitutional, because it discriminated against out-of-town providers of disposal services. *C & A Carbone v. Town of Clarkstown*, 114 S. Ct. 1677, 128 L.Ed.2d 399 (1994).

Similar reasoning to the County's "in-county" capacity policy led the State of New Jersey and its Department of Environmental Protection to require each garbage district in the State to provide for disposal capacity within the district or another district through agreements. The New Jersey plan, with its preference for in-state and in-district disposal capacity planning was struck down by the United States Court of Appeals for the Third Circuit, in *Atlantic Coast Demolition & Recycling, Inc. v. Board of Chosen Freeholders of Atlantic County*, 48 F.3d 701(3d Cir. 1995). The Third Circuit concluded that New Jersey's in-state and in-district siting preferences were violative of the Dormant Commerce Clause. It did so despite economic regulation arguments that in-county siting is an important aspect of market price regulation.

The Supreme Court decision in the *Clarkstown* case and the Third Circuit's decision in the *Atlantic Coast Demolition* case lead to the clear conclusion that, to the extent that the County Solid Waste Action Plan favors in-county disposal capacity, it may be unconstitutional, as it discriminates against environmentally sound and financially attractive out-of-county landfill alternatives.

Recommendation

In order to avoid an effective legal challenge to the draft plan, the County should prepare a truly integrated plan that utilizes all readily available options in the region.

P72.17

P72.17 Please refer to Topical Response #5.

P72.18

P72.18 This comment is noted.

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APPENDIX 1-D

COMMENTS AND RESPONSES TO THE REPORT ENTITLED
“APPROACHING AN INTEGRATED SOLID WASTE MANAGEMENT
SYSTEM FOR LOS ANGELES COUNTY”

DATED SEPTEMBER 13, 1996 PREPARED BY GERSHMAN,
BRICKNER, & BRATTON, INC. FOR THE CITY OF SANTA CLARITA

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APPENDIX 1- D

COMMENTS AND RESPONSES TO THE REPORT ENTITLED

“APPROACHING AN INTEGRATED SOLID WASTE MANAGEMENT SYSTEM FOR LOS ANGELES COUNTY”

DATED SEPTEMBER 13, 1996

**PREPARED BY GERSHMAN, BRICKNER, & BRATTON, INC. FOR THE CITY OF
SANTA CLARITA**

On October 17, 1996, the Alliance for Innovative Resource Management (AFIRM) submitted the report entitled "Approaching An Integrated Solid Waste Management System For Los Angeles County" dated September 13, 1996, Prepared by Gershman, Brickner, & Bratton, Inc., to the Los Angeles County Department of Public Works. AFIRM submitted this report as their comment to the Preliminary Draft Los Angeles County Countywide Siting Element (CSE), dated January 1996, which was prepared by the Department. However, on October 30, 1996, the City of Santa Clarita informed the Department that the report was commissioned and funded by the City.

To avoid duplication and redundancy, and to reduce the size of this Final Draft CSE, Volume II, the report is hereby incorporated by reference into this Final Draft CSE, Volume II, Appendix 1-D. Such incorporation by reference is authorized by Title 14 of the California Code of Regulations, Chapter 3 - Guidelines for Implementation of the California Environmental Quality Act (CEQA), Section 15150. The report is available for public inspection at the Department of Public Works Headquarters, Environmental Programs Division, 900 South Fremont Avenue, Alhambra.

The report claims to demonstrate that there will not be a shortfall in landfill capacity in Los Angeles County through the year 2023 with the adoption of its recommendations. The report has reached this conclusion through a series of assumptions that do not consider existing laws and regulations, economic impacts, or existing programs in place at various landfills in Los Angeles County to maximize use of remaining disposal capacity. These assumptions include 70 percent diversion rates, bans on Class III landfill disposal of certain materials such as biosolids and inert waste, limiting the use of Orange County's available import capacity exclusively to waste generated by jurisdictions in Los Angeles County, elimination of watershed/jurisdictional boundaries, ignoring land use permit restrictions, etc.

In responding to the report's conclusions, the following analysis is arranged in two major sections, a summary of the contents of the report followed by more detailed discussions on its major assumptions, its methodology, and the impact of the identified deficiencies on the conclusions reached in the report.

REPORT SUMMARY

The report's stated purpose is to provide an "independent analysis of Los Angeles County's public policy on solid waste disposal" and to provide "another perspective to a 'landfills first' policy, based upon carefully studied data projected in alternative 'scenarios' by the authors." These scenarios describe strategies "to divert more than 50 percent of the County's trash away from urban land and add years to the final life of existing landfills in the County." In performing its independent analysis, the report examines the solid waste generation and disposal projections in both the Preliminary Draft CSE and the January 15, 1995, Draft Environmental Impact Report/Environmental Impact Statement for the proposed Elsmere Canyon Landfill (Elsmere EIR/EIS). The report then attempts to show how the County "exaggerated" the projections of waste generation (apparently referring to the Preliminary Draft CSE). This conclusion is reached by describing "a clear discrepancy between the two documents" found after conducting a critical analysis.

The report sets out to develop its own independent waste generation and disposal need projections. These projections are based on a brief discussion of two studies conducted by the U.S. Environmental Protection Agency (EPA) and the California Integrated Waste Management Board (CIWMB) several years ago, and an analysis of local per capita waste generation/disposal trends for the period of 1990-1994. To justify its selection, the report describes changes in economic trends, demographics, and the income structures of Countywide population. The report concludes that all these trends will lead to lower per capita waste generation rates.

The report also describes its waste materials flow model, which is somewhat reminiscent of the CSE disposal capacity shortfall analysis computer model. The major difference between the two models lies in the way waste quantities are allocated among the remaining landfills, which represents different assumptions regarding the constraints that determine what amounts can be allocated to each facility.

Utilizing its waste materials flow model, the report analyzes the impact of various assumptions and policy proposals on the disposal capacity shortfall projections. The major assumptions/policy proposals analyzed and the report's estimate of the number of years each of them adds to the in-County remaining disposal capacity (the disposal capacity shortfall) are summarized below. Note that the estimated impact on the disposal capacity shortfall results from a combination of the impacts of the model assumptions and the impact of the proposals themselves.

- Use of landfill "historic" rates of disposal - This is estimated to result in a daily disposal capacity shortfall occurring in 2001 (as opposed to 1999 as indicated in the Preliminary Draft CSE).
- Accounting for exports to out-of-County facilities (adds two more years to the above disposal capacity shortfall).
- Bans on the disposal of inert waste and biosolids at Class III landfills (adds two years)

- Development and implementation of a 70 percent waste diversion rate by 2020 by the City of Los Angeles and the County unincorporated communities (adds one year)
- Use of chemical/foam cover as landfill alternative daily cover in-lieu-of soil (adds four years) Intensive recycling and diversion - Two model scenarios considered, both mutually exclusive
 - Implementation of 70 percent waste diversion rate on a Countywide basis (adds two years)
 - Ban on disposal of recyclable materials starting in 1998 (adds five years)

Overall, the report concludes that through the adoption of the above policies and changes in the projection methodology, the disposal capacity shortfall can be extended until the year 2023 (i.e., no shortage in daily permitted capacity of in-County disposal facilities) and that there is no need for new or expanded landfill and transformation (waste-to-energy) capacity during the CSE's 15-year planning period.

DETAILED DISCUSSION AND RESPONSE TO THE REPORT'S ASSUMPTION AND POLICY IMPACTS

Issue 1 - Los Angeles County Solid Waste Management Action Plan

The report claims that the County's Solid Waste Management Action Plan adopted by the Los Angeles Board of Supervisors in 1988 has "minimized" diversion potential. Contrarily, the Action Plan has established an integrated solid waste management system which incorporated source reduction, recycling, composting, and household hazardous waste management programs on a Countywide basis. These programs, clearly are consistent with requirements of the California Integrated Waste Management Act of 1989, Assembly Bill 939, which became effective 20 months after adoption of the Action Plan.

The Action Plan has emphasized that there is no single solution to the management of solid waste. It called for the implementation of recycling and composting programs, securing additional in-County disposal capacity, and the pursuit of out-of-County disposal capacity. Through the Action Plan, the Board of Supervisors took leadership in providing for a long-range solution for the management of solid waste on a Countywide basis using the following goals:

- Continue to pursue a balance between public and private waste management operations to provide residents Countywide an efficient and economic method of waste disposal
- Support the Countywide implementation of residential and commercial recycling, green waste composting, and household hazardous waste programs
- Continue to support public education and awareness programs
- Develop 50 years of permitted solid waste disposal capacity to be held in public

- ownership with appropriate land use protections, for use through public, private, or public/private joint venture operations-- Perform detailed environmental studies of the six potential landfill sites as identified in the Preliminary Alternate Site Study
- Support expansions of existing landfills to the maximum extent technically and environmentally feasible

Following adoption of the Action Plan, the Board of Supervisors began full implementation of the Countywide Household Hazardous Waste Program, Countywide Backyard Composting Program, various Countywide public education efforts including elementary and secondary programs addressing solid waste management. The Board also adopted a recycling ordinance and implemented curbside recycling program in the unincorporated communities. Additionally, the Board urged all cities in Los Angeles County to cooperate and take responsibility for the waste they generate and implement measures to reduce waste generation.

Issue 2 - The Preliminary Draft Countywide Siting Element's waste generation projections

The report erroneously claims that the County "exaggerated" waste generation and that "there is a clear discrepancy" between the projections in the Preliminary Draft CSE and the Elsmere EIR/EIS. There is no discrepancy in the solid waste generation between the two documents. The Elsmere EIR/EIS data is clearly identified as applicable only to the "Metropolitan Area" of the County and based solely on major Class III landfill data. This excludes all minor Class III landfills, waste-to-energy facilities, and Class III landfills in the Antelope Valley. Whereas, the Preliminary Draft CSE figures are clearly identified as Countywide disposal tonnages (see Preliminary Draft CSE page 4-19). The CSE also clearly explains these differences and the reasons for a Countywide approach in its projections.

When the Elsmere EIR/EIS base-year generation figures are adjusted to reflect Countywide disposal data, the resulting generation projections are very close to the CSE's projections for the year 1997 (which was selected by AFIRM's report for comparison to imply large discrepancies between the two), with the CSE's projections being lower.

Furthermore, there are differences between the two documents' waste generation projections as the result of the CIWMB's action.

- The Elsmere EIR/EIS uses 2.5 percent annual waste generation growth rates until the year 2000, and 1 percent growth rates afterwards.
- The Preliminary Draft CSE used the State-developed Adjustment Methodology, which the CIWMB did not adopt when the Elsmere EIR/EIS was being prepared. The CIWMB adopted the Adjustment Methodology on June 29, 1994. The adjustment factors used to generate the projections were all selected following the State guidelines. The CIWMB developed these guidelines over a period of one and one-half years, in consultation with a consortium of engineers, planners, economists, and statisticians from public and private entities representing the waste management industry, financial institutions, counties,

cities, State agencies, and using UCLA as a consultant. In attempting to find major discrepancies between the Preliminary Draft CSE and the Elsmere EIR/EIS, Figure IV-I of the report shows "Siting Element" data through the year 2043. However, the Preliminary Draft CSE only contains projection data through 2010.

The data attributed to the Elsmere EIR/EIS, as far it can be determined, appears to be the most optimistic of the three scenarios discussed in that report. The scenario projects a capacity shortfall in 2003. AFIRM chose to compare this most optimistic scenario with the worst-case scenario of the Preliminary Draft CSE, which projects a disposal shortfall by 1999. Regardless, the projections of the Elsmere EIR/EIS for the most optimistic scenario are no longer valid because it contains the assumption that the BKK Landfill will be open until 2006. This Landfill, with a disposal rate of 12,000 tons per day, closed September 1996.

Issue 3 - AFIRM's waste generation projections

The AFIRM's report (Chapter IV) states that its per capita waste generation projections are based upon 1990-1994 disposal data provided by California Board of Equalization and assumes a 18 percent diversion rate in 1990, which increases linearly to 25 percent in 1995. Using this data, AFIRM performs a linear regression through these points to project future per capita waste generation to 2043. The report recognizes the impact of recession on reducing per capita waste generation in Los Angeles County during 1990-94. However, it fails to take into account economic recovery of the region in projecting future waste generation rates. In essence, the report assumes that the recession of 1990-1994 will continue through the year 2043.

AFIRM's report indicates that the Preliminary Draft CSE uses the Adjustment Methodology developed by the CIWMB to project higher waste generation. As such, the report uses its own 1990-94 data and projects the per capita waste generation linearly through 2043. For each year after 1994, the total daily waste generation is calculated by multiplying the projected per capita waste generation by the population as projected by the California Department of Finance Demographic Research Unit. As stated above, this methodology is flawed as it assumes that the recession of 1990-1994 will continue through 2043 and it assumes that changes in waste generation are dependent solely upon the size of the population and a continually decreasing per capita waste generation. The AFIRM's methodology fails to take into account economic changes (changes in taxable sales and employment) which will contribute significantly to changes in waste generation.

The report also cites a number of trends which are claimed to support the assumption of a decreasing per capita waste generation rate, but it fails to provide any support to these claims. For example, the report claims less waste will be generated in the future because:

- the County is moving toward a service-based economy which uses more recyclables, creates less sludge, and produces refuse that can be converted to fuels
- there is less high-paying aerospace and manufacturing job growth and more lower-paying service sector job growth, and lower incomes mean less waste per capita

- population growth will be driven by immigration primarily from Mexico, Latin America, and Asia
- “many anecdotal observations have been made by AFIRM about the ‘conservation behaviors’ of recent immigrants and lower income households who continually seek ways to extend the uses of material goods and products.”

Issue 4 - The AFIRM disposal capacity shortfall analyses and methodology

The report has developed alternative scenarios to determine the effect of its various proposals on the projected year when a shortfall in daily disposal capacity is projected to occur. The report claims to allocate Countywide disposal needs to each Class III landfill based on the “historic actual uses of each landfill.” However, the report ignores the existence of legally defined wastesheds for certain landfills (such as Calabasas and Scholl Canyon Landfills), and other owner/operator restrictions on the origin of the waste accepted at their facilities (such as Puente Hills, Spadra, Brand Park, Burbank, and Savage Canyon Landfills). Because of these restrictions, solid waste cannot be freely allocated to each landfill. The waste disposal needs for each area served by these facilities must be determined independently, and all waste generated outside these areas must be allocated to landfills with no such restrictions on the origin of the waste. This omission results in substantially underestimating the waste allocations to the landfills whose remaining life is most critical in determining when the shortfall in daily permitted disposal capacity will occur. For example, under this model, waste allocations to Scholl Canyon and Calabasas Landfills reach levels that exceed existing daily rates by almost 2,000 tons. Also, the report ignores other land use permit restrictions such as the expiration of the Puente Hills Landfill’s Conditional Use Permit in 2003 or the weekly tonnage limit at Spadra Landfill.

As a part of its analysis, the report discusses the Orange County disposal capacity that has recently become available to non-Orange County generated waste. Based on this, AFIRM appears to allocate all this capacity to waste generated by the 88 cities in Los Angeles County and the County unincorporated communities generated waste. This is highly unrealistic since non-Los Angeles County waste generators will also use the Orange County's disposal capacity.

Through these convenient omissions, the report claims no shortfall in the daily disposal capacity until the year 2023.

Issue 5 - 70 percent versus 50 percent diversion rates

The report implies that the County ignores the law when it states that the “County will have to shift its waste management strategy and place more emphasis on recycling and diversion as required by law.” The report goes even further referring to 50 percent diversion as “minimal.” This diversion rate is assumed in the CSE to be achieved in the year 2000 and maintained through 2010. The assumption that every jurisdiction in Los Angeles County will meet this goal represents a giant leap with major economic impacts. However, AFIRM considers achieving and maintaining a 50 percent diversion rate by the year 2000 and beyond (an extremely difficult undertaking which may only be

achieved at great cost) minimal. It should be recognized that to achieve diversion rates as high as 50 or 70 percent, a number of elements must all be in place. This includes:

- achieving extremely high participation rates from residents and businesses
- the ability to separate recyclable materials comprising an extremely high percentage of the waste stream, through either at-source separation or adequate materials recovery facility capacity
- developing adequate composting facility capacity
- developing adequate processing capacity to turn recyclable materials into marketable products
- finding/developing markets for recycled products
- ignoring all economic consequences

Issue 6 - The need and legality of in-County disposal capacity

The report indicates that "the County should realize that its self-imposed requirement of 50 years in-County disposal capacity may have a serious legal flaw. The courts have recently ruled in-County disposal unconstitutional." The Preliminary Draft CSE clearly states a goal of the cities in Los Angeles County and the County is to secure adequate in-County disposal capacity to serve the needs of Los Angeles County residents and protect public health and safety. The CSE also presents an extensive discussion of out-of-Los Angeles County landfills that may be available for use by local jurisdictions and the needed in-County infrastructure to provide access to these facilities.

Issue 7 - Import/export of solid waste

The report has suggested that the CSE "ignores or downplays disposal already taking place in adjacent counties." If this statement refers to the changes that have occurred in the regional disposal patterns since the closure of BKK Landfill on September 15, 1996 (which may result in fewer waste imports and more waste exports), obviously the CSE which uses 1995 data would be unable to predict these changes. However, analysis of import/export trends for the years 1994, 1995, and the first half of 1996, shows a trend toward increasing imports over exports, with imports reaching nearly 3,000 tons per day, six days per week (tpd-6), for the second quarter of 1996.

The changes in disposal patterns occurring since the closure of BKK Landfill in September 1996 may result in fewer waste imports and higher waste exports. However, it should be noted that some landfills and transformation facilities in Los Angeles County continue to receive out-of-County waste.

It should be noted that the Final Draft CSE as a part of its analysis on disposal capacity shortfalls, considers exportation of waste to out-of-County disposal facilities.

Issue 8 - Inert material and biosolids ban

The report recommends the adoption of bans on the disposal of inert materials and biosolids at Class III landfills. It then claims these actions will result in a net reduction of 6 percent in landfill disposal need and an extension of two years in the time until a daily disposal capacity shortfall will occur. These assumptions ignore the fact that most of the inert waste is already being disposed at unclassified (inert) landfills due to significantly lower tipping fees. Practically all of the inert waste currently received at Class III landfills is used to satisfy daily cover requirements.

As for biosolids, most of the biosolids generated in Los Angeles County are already being used for beneficial purposes other than landfill disposal, such as composting, land application, and energy recovery. However, citizen groups are now strongly opposing the use of biosolids in composting and land application due to their concerns about potential impacts on water quality.

It should be noted that the Final Draft CSE's goals have been expanded to further promote diversion of those materials from landfill facilities.

Issue 9 - The use of foam as daily cover

The AFIRM report recommends the use of chemical or foam compounds as daily cover at landfills to reduce the amount of soil currently being used. The use of foam, or other alternative daily cover (ADC), provides the same benefits as soil in reducing odors, vectors, and litter by covering the waste as it is disposed at the landfill face but consuming less volume than soil. Therefore, disposal capacity is conserved and the life of the landfill is extended. The report claims that landfill capacity can be increased by an additional 22 percent by using foam. However, Antelope Valley, Lancaster, Savage Canyon, and Bradley Landfills use geosynthetic blankets to provide daily cover to the working face of their landfills providing the same capacity-conserving benefits as foam.

The Calabasas, Puente Hills, Scholl Canyon, and Spadra Landfills have been approved to use green waste as alternative daily cover (ADC) for several years. The ADC program provides a beneficial use of green waste which would otherwise be disposed in the landfill. The use of green waste in this manner also contributes to the establishment of the collection infrastructure needed in place for the development of composting facilities, and allows jurisdictions that set up this collection infrastructure to obtain diversion credits for the materials collected until adequate composting capacity is developed. The replacement of green waste with the use of foam as daily cover will cause the need for additional disposal if adequate composting capacity is not available.

The granting of use of ADC by landfills is not at the discretion of the Board of Supervisors or any city in Los Angeles County. The Local Enforcement Agency and the CIWMB have the sole authority to approve the use of any form of ADC (i.e., green waste, foam, or geosynthetic blanket) which is granted (or denied) on a case-by-case basis.

It should be noted that the Final Draft CSE's goals have been expanded to further promote use of alternative landfill cover material.

Issue 10- Implementation of biostabilization

The AFIRM report claims that disposal capacity can be increased by 50 percent to 100 percent through biostabilization, or the promotion of waste decomposition in landfills. Shredding waste and recirculating leachate inside the landfill achieves biostabilization to cause the breakdown of organic material, increase landfill gas generation, and volume reduction. However, AFIRM stops short of recommending the implementation of biostabilization but recommends this technology as a pilot demonstration project.

Modern landfills are designed to minimize the environmental impact on water and air resources. To achieve this goal, landfills incorporate into their design composite liner systems, leachate collection and removal systems, landfill gas extraction and removal systems, and water run-off controls. Contrary to the biostabilization process, production of leachate is strongly discouraged in landfills by employing various controls including load checking programs, landfill gas condensate collection, limitation of liquids disposal, interception of surface water, and the use of cover material to control infiltration.

The Final Draft CSE includes a detailed discussion on biostabilization.

Issue 11 - The purpose of the Integrated Waste Management Plan and the Countywide Siting Element

The County has developed and adopted a Countywide plan, namely the Solid Waste Management Action Plan. The Action Plan is a regional approach on management of solid waste in this County and includes waste reduction, public education, recycling, composting, and other waste diversion activities. The Action Plan also provides for management of household hazardous waste generated by residents. The Action Plan also has developed strategies and programs for proper management of that portion of waste that remains after recycling, composting, and other waste diversion activities have been completed. However, the Countywide Integrated Waste Management Summary Plan and the CSE are State-mandated plans and are prepared in conformance with requirements of the CIWMB's regulations. AB 939 specifies that the Summary Plan include all the cities' and the County's Source Reduction and Recycling Elements, Household Hazardous Waste Elements, and Non-disposal Facility Elements and requires that the Plan include:

- (a) a summary of significant waste management problems facing the county
- (b) an overview of the specific steps that local agencies will take, acting independently and in concert, to achieve the purposes of AB 939

(c) a statement of the goals and objectives set forth by the countywide task force

The Summary Plan, which summarizes all the elements prepared by the cities and the County, also addresses items (a) through (c) above. However, the requirements of State law clearly do not meet criteria envisioned by the AFIRM.

AFIRM apparently envisions a CSE which is different from what State law requires. The law clearly states that the CSE must address the disposal needs of Los Angeles County for the 15-year planning period through landfills and transformation facilities. The law did not intend to turn the document into a Source Reduction and Recycling Element, as one might infer from the AFIRM report. As mandated by State law, each jurisdiction in Los Angeles County has already prepared and adopted its own Source Reduction and Recycling Element.