
From: Mike Mohajer [mikemohajer@yahoo.com]
Sent: Monday, October 09, 2006 10:59 AM
To: Margo Reid Brown; Jeffrey Danzinger; Rosalie Mule; Gary Petersen; Pat Wiggins
Cc: Mark Leary; Howard Levenson; Mark De Bie; Bobbie Garcia; Ruiz, Carlos; Kenneth Murray
Subject: 10/17/06 CIWMB Meeting - Agenda Item 13 -- Proposed Permit Implementation Regulations (AB 1497)

Madam Chair and Members of the Board,

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), I would like to thank you for the opportunity to provide comments on the CIWMB staff responses to comments received on the Draft Permit Implementation Regulations dated September 11, 2006 and the proposed revisions to the subject regulations, Attachments I and II, respectively of the subject Agenda.

Currently, Subsection 21570(f)(9), Title 27 of the California Code of Regulations stipulates that the "complete" and "correct" application package for a Solid Waste Facility Permit (SWFP) must include a copy of the facility land use and/or conditional use permits. The proposed revisions to the existing regulations delete this requirement in its entirety. As indicated in our letter of September 26, 2006, a copy attached, we respectfully request that this existing requirement not be deleted. However; it is recommended that the Subsection 21570(f)(9) be revised to read: ***"Land Use and/or entitlements for the facility (e.g., Conditional Use Permit or zoning ordinance). The EA is not responsible for verifying the 'correctness' of information contained in the land use permit and/or conditional use permit submitted by the applicant and/or the facility operator;" OR substitute the deleted text with the following: "A written confirmation by the host jurisdiction's planning agency or commission verifying that the proposed SWFP activities are consistent with the land use entitlements for the facility;"***

It should be noted that the CIWMB staff draft response as provided in the Attachment I of the subject Agenda fails to mention that the proposed deletion of Subsection 21570(f)(9) would result in a mandate on local enforcement agencies (LEAs), and concurrence by the CIWMB, to issue a SWFP to a facility that does **not** have a land use permit and/or appropriate entitlement from the host jurisdiction even in those cases that the proposed facility may be adjacent to immobile populations, schools, etc. The Task Force would appreciate being provided with a written response in re to the foregoing concern that clearly recognizes the deadlines and requirements of Sections 44008 and 44009 of the California Public Resources Code as well as those listed in Sections 21650(g), 21685(b)(6) and 21685(c) of the proposed regulations (Attachment II of the subject Agenda).

Pursuant to the California Integrated Waste Management Act of 1989 (AB 939) and Chapter 3.67 of the Los Angeles County Code, the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County and 88 cities in Los Angeles County with a combined population in excess of 10 million. Consistent with these responsibilities and to ensure a coordinated effort in providing a solid waste management system that is protective of public health, safety and the environment, the Task Force also addresses issues impacting the system on a Countywide basis.

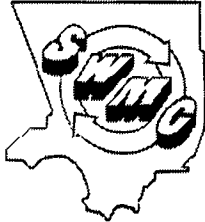
Thank you for your consideration of our concern and proposal in re to the land use/entitlements. Based on information provided in Attachment I of the subject Agenda, it appears that a similar concern has also been expressed by the County of Los Angeles Department of Public Works as well as the Local Enforcement Agency for the County of Los Angeles and 85 cities in Los Angeles County (copies of their letters are attached).

Should you have any question regarding the subject matter, please contact me at 909-592-1147.

MIKE MOHAJER
mikemohajer@yahoo.com
P.O.Box 3334
San Dimas, CA 91773-7334

CC: County of Los Angeles Department of Public Works
Local Enforcement Agency for the County of Los Angeles and 85 cities in Los Angeles County
Each Member of the Los Angeles County IWM Task Force

10/11/2006



DONALD L. WOLFE
CHAIRMAN

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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www.lacountyiswmtf.org

September 26, 2006

Margo Reid Brown, Chair
California Integrated Waste Management Board
Cal-EPA Building
1001 "I" Street
Sacramento, CA 95812-4025

Dear Chairperson Brown:

PROPOSED PERMIT IMPLEMENTATION REGULATIONS (ASSEMBLY BILL 1497)

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), thank you for the opportunity to provide comments on the proposed Permit Implementation Regulations, dated September 5, 2006. The Task Force **strongly** recommends that the proposed regulations avoid promoting/creating any conflict between the host jurisdiction's land use permit/entitlement and the State's Solid Waste Facility Permit (SWFP).

As currently written, the proposed regulations would allow a SWFP be issued to a solid waste facility even though the SWFP may be in **direct conflict** with the design/operational parameters (e.g., hours of operation, daily capacity, type of waste accepted, etc.) established by the host jurisdiction through the land use permit process. More distressing, the proposed regulations would **delete existing** regulations which require facility applicant/operators to provide a copy of the land use permit/entitlement when applying for a SWFP. Instead, the proposal would allow the issuance of a SWFP (once the enforcement agency [EA] accepts the application as "**Complete**") even in situations where the facility has **not** yet been issued a new or revised local land use permit/entitlement. Such a conflict is contrary to Public Resources Code Section 40053 which is designed to ensure that the California Integrated Waste Management Board (CIWMB) does not adopt any regulations which may limit or weaken local government authority to impose a more restrictive standard on solid waste facilities within their jurisdiction.

Due to the proposed regulations' far-reaching public policy consequences, we **strongly** request the CIWMB address this issue prior to the final adoption of the proposed regulations. We believe that if this issue is not addressed, it would give the perception that State government has abdicated its fiduciary responsibility to protect public health, safety, and the environment by not collaborating with local governments on one of its most

important functions-- permit consistency; create public confusion and a legal dilemma as to which permit governs; and, weaken the host jurisdiction's land use authority. Furthermore, we believe the proposed regulations impact will fall disproportionately on poor and disenfranchised communities because they lack the necessary resources to defend their interests. Ultimately, the proposed regulations would undermine the intent of AB 1497 which is to improve the "conditions for communities with solid waste facilities located in their neighborhoods and ensure adequate consideration is given to environmental justice issues" [Assembly Bill 1497, Montanez, 2003].

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and its 88 cities in Los Angeles County with a combined population in excess of 10 million. Consistent with these responsibilities and to ensure a coordinated and cost-effective solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a Countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

Specific Comments:

1. Title 27, Division 2, Chapter 4, Subchapter 3, Article 1, Section 21563(d)(6), Page 2, Line 15.

Specific Request – Delete the proposed new text: "The definition is only for purposes of determining when a permit needs to be revised and should not be utilized for making determinations relative to the California Environmental Quality Act (CEQA), Title 14, CCR Section 15000 et seq."

Discussion – The proposed new text is unnecessary, ambiguous, ill-defined, confusing, and may be interpreted to mean that a significant change activity is not subject to CEQA, or that the Local Enforcement Agency does not have the authority to require a new CEQA process and documentation for the proposed significant change activity.

2. Title 27, Division 2, Chapter 4, Subchapter 3, Article 2, Section 21570(f)(9), Page 4, Line 5.

Specific Request – Do not delete and instead revise to indicate "Land Use and/or entitlements for the facility (e.g., Conditional Use Permits or zoning ordinance). The EA is not responsible to verify the correctness of information contained in the land use permit and/or conditional use permit submitted by the applicant and/or the facility operator;" **OR** substitute the deleted text with the following: "a written confirmation by the host jurisdiction's planning agency or commission verifying that the proposed SWFP activities are consistent with the land use entitlements for the facility;"

Discussion – Pursuant to Section 44012 of the Public Resources Code, the primary purpose of the SWFP is to ensure the protection of public health and safety and the environment. If the proposed regulations are adopted in their current form, we believe solid waste facilities will be issued a SWFP that may be inconsistent with facility's design/operational parameters established by the host jurisdiction via the land use permit/entitlement. The criteria are often significantly more restrictive than the mitigation measures identified in the CEQA document. Since the land use permit is the primary vehicle for establishing the parameters for the "operation" of a solid waste facility, we do not believe it is possible for the EA/CIWMB to determine if a SWFP application is **complete** without ensuring consistency with the local land use permit. In addition, the proposed regulations would undermine local governments' land use authority since it would create a legal quandary as to which permit conditions govern. Such a conflict is contrary to Public Resources Code Section 40053 which is designed to ensure that the CIWMB does not adopt any regulations which may limit or weaken local government authority to impose a more restrictive standard on solid waste facilities within their jurisdiction.

The intent of Assembly Bill 1497 (Montanez, 2003) is to improve the "conditions for communities with solid waste facilities located in their neighborhoods and ensure adequate consideration is given to environmental justice issues." If the proposed text is adopted, it would also undermine the intent of AB 1497 since it would prohibit the CIWMB-approved local enforcement agencies from verifying if the applicant (or the facility operator) has the approval of the host jurisdiction. This is critical since local land use conditions are often the mechanism by which jurisdictions address environmental justice concerns and other issues raised by the community.

Our proposal would ensure consistency without imposing/recommending any additional duties to the CIWMB and/or EAs.

3. Title 27, Division 2, Chapter 4, Subchapter 3, Article 2, Section 21620(a)(4), Revised Permit, Page 9.

Specific Request – Expand the Subsection to read as follows: "(E) Increase in the facility's permitted site life and/or closure date."

Discussion – The above change will help address our concern expressed in item 2 above due to its potential significant impact on the community and the environment.

4. Title 27, Division 2, Chapter 4, Subchapter 3, Article 3, Section 21650(i), Page 12, Lines 16-19.

Specific Request – Expand the Subsection to read as follows: The EA should be aware of and take into consideration other permits/entitlements (e.g., **Conditional Use Permit or Zoning ordinance**) and approvals when writing terms and conditions]

Discussion – The above change will help address our concern expressed in item 2 above due to its potential significant impact on the community and the environment.

5. Title 27, Division 2, Chapter 4, Subchapter 3, Article 3, Section 21660.1(a)(7), Page 13, Lines 42 and 43.

Specific Request – Do not delete ". . . . (date, time, and location) for public review."

Discussion – By retaining the above text, it will help address the concerns expressed in item 2 since it would provide interested parties with key logistical information. Our request is consistent with similar requirements already incorporated in other sections of the proposed regulations, including Section 21660.3(a)(7) and Section 21660.3(a)(7).

6. Title 27, Division 2, Chapter 4, Subchapter 3, Article 3.1, Section 21685(b)(6), Page 21, Line 27.

Specific Request – Do not and instead revise to indicate "Land Use and/or entitlements for the facility (e.g., Conditional Use Permits or zoning ordinance). The EA and the CIWMB are not responsible to verify the correctness of information contained in the land use permit and/or conditional use permit submitted by the applicant and/or the facility operator." **OR** substitute the deleted text with the following: "a written confirmation by the host jurisdiction's planning agency or

Margo Reid Brown, Chair
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commission verifying that the proposed SWFP activities are consistent with the land use entitlements for the facility;"

Discussion – The above language will help address our concerns expressed in item 2 above.

We thank you for your consideration of this request regarding issues that are of great importance to local governments. The continued development/operation of solid waste facilities rests on keeping the public's faith that these facilities are safe and that government has placed the protection of public health and safety and the environment as its number one priority. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Sincerely,



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

MA:ro

P:\Sec\AB 1497_Oppose.doc

cc: Assembly Member Montanez
Assembly Member Diaz
Assembly Member Levine
Assembly Member Nunez
Senator Alarcon
Each Member of the California Integrated Waste Management Board
Executive Director, California Integrated Waste Management Board (Mark Leary)
California Integrated Waste Management Board (Howard Levenson, Mark De Bie, Bobbie Garcia)
Each Member of the Los Angeles County Board of Supervisors
Each City Mayor in Los Angeles County
Each City Manager in Los Angeles County
Each City Director of Planning in Los Angeles County
Each Member of the Los Angeles City Council
Each Member of the Los Angeles County Regional Planning Commission
League of California Cities, Los Angeles County Division
Southern California Association of Governments

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San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
North Valley Coalition
Sun Valley Area Neighborhood Council
Sun Valley Neighborhood Improvement Organization
East Valley Coalition
Hacienda Heights Improvement Association
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Facility and Plan Review Subcommittee of the Los Angeles County Integrated Waste Management Task Force
Each City Recycling Coordinator in Los Angeles County



COUNTY OF LOS ANGELES

Public Health

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Acting Director and Health Officer

JOHN F. SCHUNHOFF, Ph.D.
Acting Chief Deputy

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September 21, 2006

Ms. Bobbie Garcia
California Integrated Waste Management Board
Permitting and Enforcement Division
P.O. Box 4025, MS-16
Sacramento, CA 95812-4025

Dear Ms. Garcia:

CHANGES TO PROPOSED PERMIT IMPLEMENTATION REGULATIONS

Thank you for giving the Solid Waste Management Program (SWMP), acting as the Local Enforcement Agency (LEA) for the County of Los Angeles, an opportunity to comment on the proposed permitting implementation regulations. The SWMP has the following comments:

1. Section 21563(d)(6) – The section refers to the California Environmental Quality Act (CEQA) as Title 14 of the California Code of Regulations, Section 15000 et seq. Title 14 of the California Code of Regulations, [Division 2.] Section 15000 et seq. is the State CEQA Guidelines. A more appropriate citation would be Division 13 (commencing with Section 21000) of the Public Resources Code.
2. Section 21570(f)(9) – The requirement, currently in Title 27 of the California Code of Regulations, for a land and/or conditional use permit as part of a complete and correct permit application package has been deleted in its entirety. The SWMP believes that this may unnecessarily lead to conflicts between permits or other approvals, which have been issued by different regulatory agencies, regarding the same solid waste issues, e.g., hours for the receipt of waste. The land and/or conditional use permit is usually the first discretionary approval for a solid waste facility and is normally the result of compliance with the CEQA. If, due to local considerations, the land and/or conditional use permit had more restrictive hours for the receipt of waste than the CEQA document cited in the permit application package, the SWMP feels that the solid waste facility permit should not be used to circumvent the land and/or conditional use permit regarding solid waste issues, which are within the purview of the LEA. If anything, the stricter condition would better protect public health and safety, prevent environmental

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damage, and help ensure long-term protection of the environment. The SWMP respectfully requests that the requirement for a land and/or conditional use permit as part of a complete and correct permit application package be unchanged.

3. Section 21570(f)(11) – The word, “public,” should be inserted before “meeting” to clarify that the meetings held applicable to the proposed solid waste facilities permit are public meetings.
4. Section 21620(a)(1)(E)(xi) – With the latest deletion in the text, this subsection is the same as the previous subsection, 21620(a)(1)(E)(x), and should be deleted.
5. Section 21620(a)(1)(E)(xvi) – The phrase, “and/or adjacent improved properties,” was inserted. It is unclear what effect(s) is(are) intended to be prevented: physical, aesthetics, and/or financial. If adjacent improved properties are being protected, the argument could also be made that adjacent unimproved properties should be protected from changes to on-site traffic patterns. This phrase should be removed or rephrased to clarify how the inclusion of this phrase will protect public health and safety and prevent environmental damage.
6. Section 21660.2(c)(3) – The phrase, “noticing beyond 300 feet if the nearest residence or business is not within 300 feet of the site,” was inserted. However, without an outer limit as to the noticing distance or a definite number of notices to be issued, there is no way for the LEA to meet this noticing requirement, since there is a seemingly infinite number of residences and businesses beyond 300 feet. In addition, it has been the SWMP's experience that there are some members of the public who are not satisfied with an LEA's noticing even if the noticing complies with applicable statute. Thus, the inclusion of this phrase could expose LEAs to unnecessary criticism.

[Note: Although California Integrated Waste Management Board staff is required to respond only to newly proposed changes to the regulations, the SWMP has a comment regarding the single-underlined word, “additional.” This word indicates there are required noticing measures. However, Section 21660.2(c) does not list the required noticing measures or reference Government Code, Section 65091, subsections (a) – (c). Since the informational meeting for new and revised full solid waste facilities permits must meet noticing requirements in Section 21660.3, subsections (a) and (b), the SWMP suggests that subsection (c)(3) of Section 21660.2 be revised to reference Section 21660.3, as it pertains to new and revised full solid waste facilities permits, which includes additional noticing measures in subsection (b)(4).]
7. Section 21660.3(b)(2) – The two subsections, (a) and (b), should be changed to (A) and (B).
8. Section 21660.3(b)(4) – Please see comments regarding Section 21660.2(c)(3) above.
9. Section 21685(b)(6) – Please see comments regarding Section 21570(f)(9) above.

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10. Section 18104.1(h) – Please see comments regarding Section 21570(f)(11) above.

11. Section 18105.1(j) – Please see comments regarding Section 21570(f)(11) above.

If you have any questions, please contact Stan Uyehara at (626) 430-5542.

Very truly yours,

 for Ken Murray

Ken Murray
Chief Environmental Health Specialist

KM:su



DONALD L. WOLFE, Director

COUNTY OF LOS ANGELES

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P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

September 26, 2006

IN REPLY PLEASE
REFER TO FILE: EP-2

Ms. Bobbie Garcia
California Integrated Waste Management Board
Permitting and Enforcement Division
P.O. Box 4025, MS-10A
Sacramento, CA 95812-4025

Dear Ms. Garcia:

PROPOSED PERMIT IMPLEMENTATION REGULATIONS (ASSEMBLY BILL 1497)

Thank you for the opportunity to provide comments on the proposed Permit Implementation Regulations. As previously discussed in our June 5, 2006, letter, and further enumerated below, we **strongly** recommend that the proposed regulations be revised to avoid creating any conflict between the host jurisdiction's land use permit and the State's Solid Waste Facility Permit (SWFP).

As currently written, the proposed regulations would allow an SWFP be issued to a solid waste facility even though the SWFP may be in direct conflict with the facility's design/operational parameters (e.g., hours of operation, daily capacity, type of waste accepted, etc.) established by the host jurisdiction through the land use permit process. Furthermore, the proposed regulations would delete existing regulations which require facility operators to provide a copy of the land use permit when applying for an SWFP, and would instead allow the issuance of a SWFP (once the Enforcement Agency accepts the application as "Complete" and "Correct") even in situations where the facility has not yet been issued a local land use permit. Such a conflict is contrary to Public Resources Code Section 40053 which is aimed at ensuring that the California Integrated Waste Management Board Waste Board (Waste Board) does not adopt regulations which may limit or weaken the authority of a local government to impose a more restrictive standard on solid waste facilities within their jurisdiction.

Due to the proposed regulations' far-reaching public policy consequences, we request the Waste Board address this issue prior to the final adoption of the proposed Regulations. If this issue is not addressed, it would create the perception that the State government has abdicated its fiduciary responsibility to protect public health, safety, and

the environment by not collaborating with local governments on a most important of functions--permit consistency; create public confusion and a legal dilemma as to which permit governs; and, weaken the host jurisdiction's land use authority. Most importantly, we believe the impact of the proposed regulations will fall disproportionately on poor and disenfranchised communities because they lack the necessary resources to defend their interests. Ultimately, the proposed regulations would undermine the intent of Assembly Bill 1497 which is to improve the "conditions for communities with solid waste facilities located in their neighborhoods and ensure adequate consideration is given to environmental justice issues" [Assembly Bill 1497, Montanez, 2003].

The following comments are provided:

1. Title 27, Division 2, Chapter 4, Subchapter 3, Article 1, Section 21563(d)(6), Page 2, Line 15.

Specific Request—Delete the proposed new text: "The definition is only for purposes of determining when a permit needs to be revised and should not be utilized for making determinations relative to the California Environmental Quality Act (CEQA), Title 14, CCR Section 15000 et seq."

Discussion—The proposed new text is unnecessary, ambiguous, ill-defined, confusing, and may be interpreted to mean that a significant change activity is not subject to CEQA, or that the Local Enforcement Agency does not have the authority to require a new CEQA process and documentation for the proposed significant change activity.

2. Title 27, Division 2, Chapter 4, Subchapter 3, Article 2, Section 21570(f)(9), Page 4, Line 5.

Specific Request—Do not delete "Land Use and/or entitlements for the facility (e.g., Conditional Use Permits or zoning ordinance);" **OR** substitute the deleted text with the following: "a written confirmation by the host jurisdiction's planning agency or commission verifying that the proposed permit activity is consistent with the land use entitlements for the facility."

Discussion—Pursuant to Section 44012 of the Public Resources Code, the primary purpose of the SWFP is to ensure the protection of public health and safety and the environment. If the proposed regulations are adopted in their current form, we believe solid waste facilities will be issued an SWFP that may be inconsistent with facility's design/operational parameters established by the

host jurisdiction via the land use permit/entitlement. The criteria are often significantly more restrictive than the mitigation measures identified in the CEQA document. For example, the Environmental Impact Report for a recent transfer station expansion analyzed an 8,500 tons per day project. However, the approved land use permit only allows a maximum tonnage of 5,000 tons per day and places many restrictions upon the facility's operation which were not analyzed in the Environmental Impact Report. Since the land use permit is the primary vehicle for establishing the parameters for the "operation" of a solid waste facility, we do not believe it is possible for the Waste Board to determine if an SWFP application is complete and correct without ensuring consistency with the local land use permit. In addition, the staff proposal would undermine local governments' land use authority since it would create a legal quandary as to which permit conditions govern. Such a conflict is contrary to Public Resources Code Section 40053 which is designed to ensure that the Waste Board does not adopt any regulations which may limit or weaken the authority of a local government to impose a more restrictive standard on solid waste facilities within their jurisdiction.

The intent of Assembly Bill 1497 (Montanez, 2003) is to improve the "conditions for communities with solid waste facilities located in their neighborhoods and ensure adequate consideration is given to environmental justice issues." If the proposed text is adopted, it would also undermine the intent of Assembly Bill 1497 since it would prohibit the Waste Board-approve local enforcement agencies from verifying that the information contained in the SWFP application is consistent with the local land use permit. This is especially relevant since local land use conditions are often the mechanism by which jurisdictions address environmental justice concerns and other issues raised by the community.

Our proposal would ensure consistency without imposing/recommending any additional duties to the Waste Board and/or Local Enforcement Agencies.

3. Title 27, Division 2, Chapter 4, Subchapter 3, Article 2, Section 21620(a)(4), Page 9, Line 25.

Specific Request—Expand the Subsection to read as follows:

"(E) Increase in the facility's permitted site life and/or closure date."

Discussion—The above change will help address our concern expressed in item 2 above due to its potential significant impact on the community and the environment.

4. Title 27, Division 2, Chapter 4, Subchapter 3, Article 3, Section 21650(i), Page 12, Lines 16-19.

Specific Request—Expand the Subsection to read as follows: ". . . . The Enforcement Agency should be aware of and take into consideration other permits/entitlements (e.g., **Conditional Use Permit or Zoning ordinance**) and approvals when writing terms and conditions]."

Discussion—The above change will help address our concern expressed in item 2 above due to its potential significant impact on the community and the environment.

5. Title 27, Division 2, Chapter 4, Subchapter 3, Article 3, Section 21660.1(a)(7), Page 13, Lines 42 and 43.

Specific Request—Do not delete ". . . . (date, time, and location) for public review."

Discussion—By retaining the above text, it will help address the concerns expressed in item 2 since it would provide interested parties with key logistical information. Our request is consistent with similar requirements already incorporated in other sections of the proposed regulations, including Sections 21660.3(a)(7) and 21660.3(a)(7).

6. Title 27, Division 2, Chapter 4, Subchapter 3, Article 3.1, Section 21685(b)(6), Page 21, Line 27.

Specific Request—Do not delete "Land Use and/or Conditional Use Permits;" **OR** substitute the deleted text with the following: "a written confirmation by the host jurisdiction's planning agency or commission verifying that the proposed permit activity is consistent with the land use entitlements for the facility..."

Discussion—The above language will help address our concerns expressed in item 2 above.

Ms. Bobbie Garcia
September 26, 2006
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We thank you for your consideration of this request regarding issues that are of great importance to local governments. If you have any questions, please contact me at (626) 458-3502, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

DONALD L. WOLFE
Director of Public Works



CARLOS RUIZ
Assistant Division Engineer
Environmental Programs Division

MA:my
P:\Sec\AB 1497 PWs.doc

cc: Each Member of the California Integrated Waste Management Board
Executive Director, California Integrated Waste Management Board (Mark Leary)
California Integrated Waste Management Board (Howard Levenson, Mark De Bie)
County of Los Angeles Department of Health Services (Ken Murray, Stan Uyehara,
Pete Oda)