



MARK PESTRELLA, PE, CHAIR  
SAM SHAMMAS, VICE-CHAIR

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331  
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460  
[www.lacountyiswmf.org](http://www.lacountyiswmf.org)

December 22, 2021

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

Dear Mr. Skye:

**COMMENTS ON THE LOS ANGELES COUNTY PRELIMINARY DRAFT REVISED COUNTYWIDE SITING ELEMENT AND DRAFT ENVIRONMENTAL IMPACT REPORT (SCH No. 1995011048)**

Pursuant to the California Public Resource Code (PRC), Sections 41700 through 41721.3 and 49500, and the California Code of Regulations (CCR), Title 14, Sections 18755 through 18756.7, the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) has reviewed the June 2020 of the Los Angeles County Preliminary Draft Revised Countywide Siting Element (Draft Revised CSE) and its Draft Environmental Impact Report (DEIR), and offers the following comments:

A copy of the Draft Revised CSE and its DEIR can be found by clicking on the following two links below:

- [Los Angeles County Preliminary Draft Revised Countywide Siting Element](#)
- [Draft Environmental Impact Report](#)

**General Comments:**

- The Draft Revised CSE should be consistent in using the terms "disposal facility" vs "landfill". The document discusses disposal facilities, which include landfills and transformation facilities.

- The Draft Revised CSE must identify all Engineered Municipal Solid Waste (EMSW) in Los Angeles County, if any.
- The California Code of Regulations (CCR), Title 14, Section 18756.7, Subdivision A, paragraph 3, requires identification of revenue sources sufficient to support administration and maintenance of the countywide or region-wide solid waste disposal facilities siting program. Therefore, funding should be addressed in the Draft Revised CSE.
- The Draft Revised Siting Element should continue to promote and develop strategies to support the development of conversion technologies and to the extent, the County can develop those sites within Los Angeles County that will certainly alleviate the need for exporting waste out of the county or also that the County would have a long-term capacity to handle what is currently now going to landfills.
- The County should prioritize developing In-County capacity through conversion technologies. However, the County should not close the door to the export of solid waste if that means extending the life of In-County capacity.
- The Draft Revised Siting Element should place more emphasis on conversion technologies as a means of managing waste and derive useful products, whether it's electricity, fuel, or other things, to help the County manage all the organic waste.
- Identify or label any image of a landfill or any photos of a facility used throughout the document.

### **Specific Comments:**

- **List of Acronyms**
  - List of Acronyms (page xxii): Change the acronym of Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force “TF” to “Task Force”
- **Chapter 1 – Introduction**
  - Section 1.11 *Role of Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force*: Update the section to clarify that the Los Angeles County Solid Waste Management Committee (CoSWMC) has not been replaced by the Integrated Waste Management Task Force (Task Force). The role of CoSWMC was expanded as a result of AB 939, and on February 27, 1990, the Board of Supervisors considered and

subsequently sought approval from cities in Los Angeles County to designate the CoSWMC as the Task Force.

- **Chapter 2 – Goals and Policies**

- Goals 4, 6, 7, and 8 (Policy No. 8.1): Add “environmentally appropriate”.
- Table 2-1 *Countywide Siting Element Task Implementation Responsibilities for Year 2018-2033*, and Goals 1, 4, and 8: (a) Add the Department of Toxic Substances Control (DTSC) and the California Department of Food and Agriculture (CDFA) to California State agencies that regulate infectious, toxic, or contaminated green waste products such as compost, soil additives, and other products from the processing organic wastes at solid waste facilities, (b) under the “Los Angeles County Solid Waste Management/Integrated Waste Management Task Force” column, Policy No.1.3, revise “**A**” to “**S**”, and (c) under the same column, Policy No. 6.2, consistent with chapter 3,67 of the County Code, revise “Support and promote legislation and regulation ....” to read “Introduce, support and promote legislation and regulations .....

- **Chapter 3 – Existing Solid Waste Disposal Facilities**

- Section 3.1 *Purpose and Key Terms* (page 53): Should include definitions of the following terms: Class I landfill, Class II landfill, Class III Landfill, and EMSW. Also, add a statement: "All Class II and Class III landfills can accept solid waste. There are no active Class I landfills in Los Angeles County. For the purpose of the CSE, the use of the term "landfill" refers to Class III landfills." These terms should also be defined in the Glossary of Terms.
- Table 3-1 *Summary of Existing Class III Landfills, Permitted Inert Waste Landfill, and Transformation Facilities in Los Angeles County* and Map 3-1 *Locations of Existing Class III Landfills, Permitted Inert Waste Landfills, and Transformation Facilities in Los Angeles County* (page 57): On the heading insert “EXISTING MAJOR CLASS III LANDFILLS.”

- **Chapter 4 – Current Disposal Rate and Assessment of Disposal Capacity Needs**

- Scenario Tables (Tables 4-11 through 4-17): Verify if the remaining capacity of Sunshine Canyon Landfill in 2033, as shown in all scenario tables, is consistent with the requirements of the Landfill’s Conditional Use Permit closure year and whether the Landfill can request from the County additional years of operation or not.
- Table 4-8 *Summary of Description of Disposal Capacity Need Analysis Scenarios Assuming AB 939 Diversion is Fully Implemented and No New Class*

*III Landfills in Los Angeles County during the Planning Period: Expand “Alternative Technologies” to every In-County Landfill and Recycling Center.*

- Solid waste projections should exclude the influence of Alternative Technologies in decreasing the disposal of solid waste.
- Figure 4-4 (page 193) - *Graph of Solid Waste Disposal Capacity Projections for Each Scenario for the Planning Period (2018-2033)*: Ignores wide use of Alternative Technologies in producing electricity.
- Table 4-14 *Scenario IV - Meeting Senate Bill 1383 Organic Waste Disposal Reduction Targets*: Has a yellow column labeled “Imports from other Countries”. This statement should be corrected.
- Table 4-16 (Pg 221) - *Scenario VI - Increase in Exports to Out-of-County Landfills (Excluding Potential Waste-by-Rail Capacity)*: Ignores Alternative Technologies.

- **Chapter 5 – Alternative Technologies**

- Revise Table 5-2 *Conversion / Recovery Technology Comparison Table*. Table should include useful data on the number of megawatt hours produced per ton of solid waste or how much it takes to produce a specified number of megawatt hours.
- Appendix 5B *Recovering Energy Natural Resources and Economic Benefit From Waste For LA (Renew LA) Synopsis, Solid Waste Integrated Resources Plan (SWIRP) Executive Summary and Waste Management Hierarchy*, Solid Waste Integrated Resources Plan (SWIRP), Executive Summary, Facility Phasing 2013 – 2030: Revise to do more electric power producing facilities.
- Appendix 5B *Recovering Energy Natural Resources and Economic Benefit From Waste For LA (Renew LA) Synopsis, Solid Waste Integrated Resources Plan (SWIRP) Executive Summary and Waste Management Hierarchy* - City of Los Angeles SWIRP Waste Management Hierarchy: How well are they doing? I understand they are planning an Alternative Technology facility to produce electrical energy from solid waste. That may impact their solid waste triangle, but the lights will stay on in the City.

- **Chapter 6 – Facility Siting Criteria**

- Include a map for Antelope Valley Air Quality Management District.

- Section 6.3 *Specific Requirements*: Pending enactment of appropriate state law, remove the write-up referencing PRC Section 44004 (h) (1).
  - Table 6B-1 *List of Regulating, Permitting and Responsible Agencies*: Should update table with current information.
  - Section 6.3 *Specific Requirements*: CCR, Title 14, Section 18756: Revise to add use of solid waste transformation and processing for fuel and Section C: for approval of conversion/transformation facilities.
  - Section 6.4.1 *Siting*, Paragraph 1: Replace “transformation processes destroy the waste it handles” with “transformation processes utilize waste to produce useful products such as electricity, sterile compost, etc.” This Section needs to discuss transforming, not destroying solid waste.
    - i. Add new bullet: “Produce electricity and other marketable products of transformation of solid waste.”
  - Section 6.4.2.2 *Ministerial Permits*: Expand to include Waste Discharge Requirement Permit
  - Section 6.6.5 *Finding of Conformance*: Please explain what changes are needed for a revised Finding of Conformance for a solid waste transformation facility, here and in Chapter 10.
  - Section 6.6.8 *Other Agencies*: Need to add DTSC and CDFA when the solid waste facility is transforming, not disposing, solid waste. Also expand the list to include Los Angeles County Agricultural Commission
  - Figure 6B-1 *South Coast Air Quality Management District Map*: Make sure accuracy of number labels for General Forecast and Monitoring Areas.
  - Table 6A-2 *Solid Waste Disposal and Alternative Technology Facility Siting Criteria Objectives and Factors*: Expand to include products of transformation facilities and note that these products meet health and toxicity standards set by DTSC and CDFA.
  - Table 6B-1 *List of Regulating, Permitting and Responsible Agencies*: Add DTSC and CDFA, and California Public Utilities Commission under (CPUC) “State Agencies” and “Los Angeles County Agricultural Commission”.
- **Chapter 7 – Proposed In-County Facility Locations and Descriptions**

Section 7.7, *Transformation Facilities*: Section needs to be expanded to place more emphasis on conversion technologies as a means of managing waste and derive useful products in the County. There is only one transformation facility in the County (South East Resources Recovery Facility) that continues to be a valid solid waste management facility. However, the County cannot rely on one transformation technology as an effective means to divert solid waste from landfills.

- Section 7.8, *Alternative Technology Facilities*: After many years of studies and report preparations, the Los Angeles County Board of Supervisors on April 20, 2010, approved a number of Memorandums of Understanding (MOU) with stakeholders, while directing the Director of the LA County Public Works to proceed with completion of the feasibility study with a strong emphasis on development of Alternative Technology Facilities at the earliest. However, the Task Force is disappointed with the lack of progress. The Task Force strongly believes the need for the development and operation of these facilities. To build these solid waste transformation facilities, we need local renewable sources of electricity right now, considering the failing power grid, loss of natural waterpower sources, and the power lines lost or turned off in severe wildfire conditions, Los Angeles County needs to use its renewable resources of solid waste to produce electrical power for our 88 cities and unincorporated County. Moreover, electricity generated from solid waste provides a stable continuous source of power which will be a vital to the State power grid when solar and wind power are not available such as at night or dark skies due to smoke and soot from wildfires and periods of low winds.
- Table 7-1 *Proposed Potential Locations for Alternative Technology Facilities in Los Angeles County*: Conduct a detailed evaluation of the proposed potential locations for alternative technology facilities in Los Angeles County in concert with the siting criteria developed by the Public Works and the Task Force in 2008. It should be noted that the placement or the identification of a site in the document does not mean that that a facility needs to be developed in that location.

- **Chapter 8 – General Plan Consistency**

- See comment on Chapter 7, Section 7.8 *Alternative Technology Facilities* above.

- **Chapter 9 – Out-of-County Disposal**

- The purpose of this chapter should be to reduce out of county waste disposal, not buy more air-polluting trucks to send our solid waste to other counties. We need that solid waste to give our County local sources of electrical power. If we

produce enough electrical power, we can even afford to reduce air pollution by having our truck fleets run on electricity, reducing our air pollution even more.

- Section 9.8 *Out-of-County Landfills Potentially Available for Out-of-County Disposal*: CCR, Title 14, Section 187 55 (a) (b) requirements: States the basic requirements for solid waste disposal and transformation facilities or additional strategies. We should be transforming 49% of our solid waste, not exporting it out of LA County!
- The Task Force would like to know the daily emissions from trucks going to out-of-County landfills, then returning to LA County? How many megawatts of electricity and tons of sanitized compost are being throw away? Jurisdictions in Los Angeles County may be losing money wasting their solid waste resources when they could be making some money. There may be ten sites potentially ready to build transformation/alternate technology facilities right now. Public Works should not waste this opportunity.

- **Chapter 10 – Finding of Conformance**

- PRC 50001 (a) (page 411) should read: ...."no person shall establish or expand a solid waste facility, as defined in Section 40194, in the 'county unincorporated areas and any city within the county' unless the solid waste facility meets one of the following criteria:"
- Section 10.1 *Purpose*: The purpose should be clarified to indicate that non-disposal facilities are not subject to review and approval by the Task Force.
- Table 10-1 *Finding of Conformance (FOC) Proposal Submittal Requirements*, Section B: Add item 8: Provide a contour map showing existing and final contours for landfills only.
- Table 10-1 *Finding of Conformance (FOC) Proposal Submittal Requirements*, Section G, 2a: Add new subparagraph (a): To the maximum degree feasible, minimize disposal of organic waste.
- Table 10-1 *Finding of Conformance (FOC) Proposal Submittal Requirements*, Section G, 2e: Revise to read, "Support the host jurisdiction's Mass Debris Removal and Recycling Plan and Programs."

- **Environmental Justice Document**

- Include the community of Val Verde in the Environmental Justice Document.

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As provided by 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 the 88 cities in Los Angeles County. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally-sound 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, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

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

Sincerely,



Sam Shammass, Vice Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force

JB:

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cc: California Department of Resources Recycling and Recovery  
Each Member of the Los Angeles County Integrated Waste Management  
Committee/Integrated Waste Management Task Force  
Each Member of the Facility & Planning Review Subcommittee