



May 4, 2012

Margaret Clark, Vice-Chair
LA County SWM Committee/Integrated Waste Management Task Force
PO Box 1460
Alhambra, CA 91802

Dear Ms. Clark:

Subject: Finding of Conformance, Savage Canyon Landfill

This is in response to your letter of March 22, 2012, in which you requested the City of Whittier apply to the Task Force for a Finding of Conformance (FOC with the Countywide Siting Element (CSE) related to our current application to the Local Enforcement Agency (LEA) for a modified solid waste facility permit for the City's Savage Canyon Landfill (SCLF).

The City has reviewed your letter and the CSE. We believe that a FOC is unnecessary. Our reasons are summarized below.

The CSE requires a FOC for the following events (CSE, p. 10-2):

1. New facilities;
2. Expansions of existing facilities, where expansion is defined (CSE, p. xx) as either an increase in the permitted elevation or an increase in the horizontal permitted boundary;
3. "Significant changes" requiring CEQA compliance;
4. Solid waste facility permit revisions;
5. Increase in daily permitted capacity.

None of these conditions apply to our permit modification application:

1. The SCLF is an existing facility listed in the CSE;
2. The revised grading plan that resulted in an increase in site life involves neither an increase to the maximum permitted elevation, nor a lateral expansion of the permitted boundary;

3. The modified permit does not require CEQA compliance for a significant change. Nevertheless, out of an abundance of caution, the City authorized preparation of an Initial Study (March, 2001). No adverse impacts were identified and no mitigation measures were recommended;
4. Our application is for a solid waste facility permit *modification*, not a revision;
5. There is no requested increase in daily permitted capacity.

In addition to these reasons, we offer the following information which may be of interest to the Task Force.

The SCLF is a "minor" landfill as defined by the CSE. The revised grading plan will result in an increase in site life, and yet it will still be a minor landfill with a correspondingly minor contribution to the County's disposal capacity. Nevertheless, the CSE includes policies to enhance the in-County landfill disposal capacity including specifically the following:

- "encourage and assist other jurisdictions in developing, to the maximum extent feasible, disposal capacity available for expansion within their boundaries" (CSE, p. 2-3)
- "encourage the full development of potentially available capacity at the Savage Canyon Landfill in the City of Whittier" (CSE, p 2-3).

Consistent with your policy is our current permit modification application for the revised grading plan, and our operational practices of using tarps for daily cover (CSE, p. 5-35) and our prohibition against disposal of green waste.

We have been frustrated that our permit renewal is taking so long. The City has provided multiple submittals of applications, permit documents (including complete Joint Technical Documents), and numerous updates of the same over the years while waiting for the LEA to complete the permit renewal process. Not only do we believe that a FOC is unnecessary according to your policies, but we appeal to the Task Force to "encourage and assist ... the full development of potentially available capacity at the Savage Canyon Landfill" by submitting a letter of support to the LEA for our permit modification. I make this request with all due respect to the Task Force members and to their important function since I served for many years as a member and Vice-Chair of the Sacramento Cities/County Task Force.

Sincerely,



David A. Pelser, PE, BCEE
Director of Public Works