



LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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DONALD L. WOLFE
CHAIRMAN

April 19, 2007

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

Dear Chairperson Brown:

PROPOSED REGULATIONS ON POSTCLOSURE MAINTENANCE AND FINANCIAL ASSURANCE DEMONSTRATIONS FOR LANDFILLS

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, I would like to extend our support for the proposed regulations as outlined by your staff in Option 1 of the staff report submitted for Agenda Item 8, Section III - Options for the Board, during your Board's March 13, 2007, meeting.

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 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, waste management industry, environmental groups, the public, and a number of other governmental agencies.

The proposal would address the ongoing necessity to financially maintain closed/inactive landfills beyond the 30 years currently mandated in State regulations; potential corrective actions necessary at operating and closed landfill sites; and strengthen current financial assurance demonstrations provided to the State including the potential for new financial assurance demonstrations and financing mechanism. The Waste Board should begin the process of adopting the more comprehensive regulations while it proceeds with conducting the

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longer-term risk evaluation study required pursuant to AB 2296 (2006 Statutes). We believe the proposed regulations would strengthen the public trust and confidence that funds will be available until a landfill no longer poses a risk to public health, safety and the environment. This is an important step in not only ensuring that landfills operate under the most appropriate technical and environmental standards protecting public health, safety and the environment, but also in ensuring that the citizens of California are not left holding the bag at anytime during the closure or postclosure maintenance period, should the owner/operator default on its obligations or be in bankruptcy. We believe that Option I is consistent with the intent of AB 2296 which requires the Waste Board adopt this year a set of regulations that deal with improving the closure and post closure maintenance cost estimates.

I appreciate your consideration and look forward working with you and your staff to ensure our disposal infrastructure continues to protect public health and safety and the environment. 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

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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, Richard Castle)
Each member of the Los Angeles County Board of Supervisors
Each City Mayor in Los Angeles County
California State Association of Counties
League of California Cities
League of California Cities, Los Angeles County Division
Southern California Association of Governments
Gateway Cities Council of Governments
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Each Local Enforcement Agency in Los Angeles County
Each City Recycling Coordinator in Los Angeles County
Each Member of the Los Angeles County Integrated Waste Management Task Force