



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.lacountyiswmtf.org

April 28, 2022

Ms. Emiko Thompson
Environmental Programs Division
Los Angeles County Public Works
900 South Fremont Avenue
Alhambra, CA 91803-1331

Dear Ms. Thompson:

CONSIDERATION OF THE LOS ANGELES COUNTY FINAL 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) and its Facility and Plan Review Subcommittee (Subcommittee) have reviewed the June 2020 Los Angeles County Preliminary Draft Revised Countywide Siting Element (Draft Revised CSE), Draft Environmental Impact Report (DEIR), and Environmental Justice document.

A copy of the documents can be found by clicking on the following links below:

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

The Task Force provided a letter to the Los Angeles County Public Works (Public Works), dated December 22, 2021, transmitting the Task Force's comments on the Draft Revised CSE, DEIR, and Environmental Justice document (Attachment A). In addition, the Subcommittee held special meetings on November 9, 2021, and February 25, 2022, to review and discuss responses/suggested revisions from Public Works to the Task Force comments on the Draft Revised CSE, DEIR, and Environmental Justice document (Attachment B).

Ms. Emiko Thompson
April 28, 2022
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Consequently, Public Works, acting as the lead agency, made appropriate changes to the documents, and prepared written responses to Task Force comments (Attachment C). Subsequently, on March 17, 2022, the Subcommittee and the Task Force at their publicly held virtual meetings considered the Draft Revised CSE, DEIR, and Environmental Justice document. There were no further comments from the Task Force which 9 voted yes and 1 abstained, representing a majority of the Task Force Members present at the meeting, to concur with the documents (Attachment D). With the Subcommittee and Task Force's consideration, Public Works should proceed in preparing the Final Draft Revised CSE for approval by the County Board of Supervisors to release to the cities for a 90-day approval/disapproval process.

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 or (909) 592-1147.

Sincerely,



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

JB:cso

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Enc.

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

ATTACHMENT A

**THE LOS ANGELES COUNTY SOLID WASTE MANAGEMENT
COMMITTEE/INTEGRATED WASTE MANAGEMENT TASK FORCE COMMENT
LETTER DATED DECEMBER 22, 2021 REGARDING THE LOS ANGELES COUNTY
PRELIMINARY DRAFT REVISED COUNTYWIDE SITING ELEMENT, DRAFT
ENVIRONMENTAL IMPACT REPORT, AND ENVIRONMENTAL JUSTICE
DOCUMENT**



MARK PESTRELLA, PE, CHAIR
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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.

Mr. Coby Skye
December 22, 2021
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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 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

ATTACHMENT B

**MINUTES OF MEETINGS OF THE FACILITY AND PLAN REVIEW SUBCOMMITTEE
REGARDING COMMENTS ON THE LOS ANGELES COUNTY PRELIMINARY
DRAFT REVISED COUNTYWIDE SITING ELEMENT, DRAFT ENVIRONMENTAL
IMPACT REPORT, AND ENVIRONMENTAL JUSTICE DOCUMENT**

Facility and Plan Review Subcommittee
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force

SPECIAL MEETING
February 25, 2022

WEB CONFERENCE

Los Angeles County Public Works
900 South Fremont Avenue
Alhambra, CA 91803

SUBCOMMITTEE MEMBERS PRESENT:

Dorcas (Dee) Hanson-Lugo, County of Los Angeles Department of Public Health
Patrick Holland, Los Angeles County Public Works
Betsey Landis, Chair, Environmental Organization Representative
Mike Mohajer, General Public Representative
Sam Shamma, Los Angeles County Sanitation Districts

OTHERS PRESENT:

Joe Bartolata, Los Angeles County Public Works
Tim Fargo, City of Los Angeles
Wayde Hunter, North Valley Coalition of Concerned Citizens
Carol Oyola, Los Angeles County Public Works
Trishina Robinson, Los Angeles County Public Works
Aric Rodriguez, Los Angeles County Public Works
Coby Skye, Los Angeles County Public Works
Carlos Slythe, Los Angeles County Public Works
Jeffrey Zhu, Los Angeles County Public Works

I. CALL TO ORDER

Ms. Betsey Landis called the meeting to order at 9:03 a.m.

II. DISCUSSION OF FPRS COMMENTS ON THE DRAFT WRITTEN RESPONSES TO TASK FORCE COMMENTS AND THE PROPOSED REVISIONS TO THE PRELIMINARY DRAFT REVISED CSE

The Subcommittee agreed to review the document chapter-by-chapter, addressing questions and/or comments by respective members.

Attachment A - Draft Written Responses to Task Force comments on the Preliminary Draft Revised CSE

Mr. Mike Mohajer noted his comments for Response to Comment #3 and Response to Comment #11. Mr. Mohajer also informed that the California Department of Toxic Substances Control (DTSC) is extensively involved with the household hazardous waste element in the Integrated Waste Management Plan, in addition to the California Department of Food and Agriculture (CDFA) and is not certain if there is room to expand on that fact.

There were no other comments on Attachment A from Subcommittee members.

Attachment B - [Proposed Revisions to the Preliminary Draft Revised CSE](#)

Chapter 1 – Introduction

Mr. Mohajer noted his comment to Chapter 1, page 3, and the 1996 dates conflicting. He also mentioned that the Task Force was extensively involved in the preparation of the document, and it should be noted throughout the document that Public Works and the Task Force worked in collaboration.

Ms. Landis noted adding a sentence about regional electrical power sources to the last paragraph on page 8, under transformation technology. Mr. Holland strongly disagreed because the document has nothing to do with power generation, but rather is a disposal planning capacity document. However, he commented a sentence would be added.

There were no other comments on Chapter 1 from Subcommittee members.

Chapter 2 – Goals and Policies

Mr. Mohajer noted his comments being added to Policy No. 4.5 on page 4 to read: “The cities in Los Angeles County, the County, and the Task Force, as part of their LUP (zoning variance) and Finding of Conformance or similar process, will support

Class III landfill operators to use appropriate materials, when technically feasible and environmentally safe, such as tarps, for landfill daily cover, in order to conserve landfill capacity.; Policy No. 7.1 on page 7; and Table 2-1 to read: The cities in Los Angeles County, the County, and the Task Force will introduce, support and promote legislation and regulation which would provide uniform, minimum, and feasible standards for State agencies to establish environmental and regulatory requirements for all solid waste management facilities., Policy No. 6.2 on page 6, and Policy No. 7.1 on page 7 to change from “Support Entity (SE)” to “Lead Entity (LE).

Ms. Landis noted her comments being added to Table 2-1; Goal No. 1, Goal No. 3, Goal No. 5, and Goal No. 7. She elaborated on her discontentment with the choices of potential sites developers considered. Mr. Holland responded that the Task Force does not decide where developers identify their projects to be sited and that Public Works received letters such as the City of Santa Monica identifying sites. Therefore, those sites will remain in the document.

There were no other comments on Chapter 2 from Subcommittee members.

Chapter 3 - Existing Solid Waste Disposal Facilities

On page 3 where it lists major Class III landfills that have closed or stopped receiving municipal solid waste (MSW), Mr. Mohajer asked who ordered the stop of MSW. Mr. Holland responded he could not recall, but staff could look into and inform the Subcommittee. Mr. Mohajer commented that he was one of the citizens pushing for the closure of the Azusa Landfill due to groundwater contamination which the community also addressed to the Regional Water Quality Control Board (Water Board) so would like document to note the Water Board ordered to stop receiving MSW.

On page 4 regarding Savage Canyon, Mr. Mohajer noted his comment to add "(primarily for City of Whittier waste use only)".

On page 7, second to the last paragraph regarding Commerce Refuse-to-Energy Facility (CREF), Mr. Mohajer noted dates should be included. Mr. Sam Shammass commented he would look up the closure date and notify Public Works staff.

There were no other comments on Chapter 3 from Subcommittee members.

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

Ms. Landis requested adding to Table 4-14 footnotes, the uses of alternative and conversion technologies and creating electrical power and note sanitized compost because compost must be heated to at least 1,000 degrees.

Mr. Shammass confirmed with County Sanitation District records that the closure of CREF is June 2018.

Mr. Aric Rodriguez commented that staff understood Ms. Landis' comments and that Table 4-14 details permitted capacity planning and not what happens at the facilities, which is detailed in other chapters. He suggested reviewing other locations where it describes composting methods and include the specific concerns. Ms. Landis felt it was important to note in the capacity planning section under footnotes.

There were no other comments on Chapter 5 from Subcommittee members.

Chapter 5 - Alternative Technologies

Under Alternative Technologies on page 7, third paragraph, Ms. Landis asked if the permit was renewed for a plant that closed. Mr. Shammass responded that the facility is still in operation, but that he would check on the EPA RIN certification received to include the language. Mr. Holland mentioned it was one of the biggest facilities taking in a huge amounts of food waste and commended the County Sanitation Districts.

Ms. Landis noted her comment on page 14, first paragraph to read: "Nevertheless, conversion technologies should be continually evaluated and developed so that the County may manage a significant share of its solid waste in the future."

Ms. Landis noted her comment on page 17, Biological Conversion Process, to include the heating of compost to read: "Biological conversion processes are designed for biodegradable organics only under controlled temperature and require an extensive amount of pre-processing."

There were no other comments on Chapter 5 from Subcommittee members.

Chapter 6 – Facility Siting Criteria

There were no comments on Chapter 6 from Subcommittee members.

Chapter 7 – Proposed In-County Facility Locations and Descriptions

Ms. Landis asked on the Proposed In-County Facility Locations and Descriptions if there were any sites that are fully permitted since 2010 and not being used. Mr. Bartolata responded he was not sure about the sites listed in the document being permitted. She assumed that perhaps some of those permits had lapsed since they were from 2010 and wondered why Public Works had not done anything with those sites. Mr. Holland responded that except for the Calabasas Landfill,

Public Works is not really looking to develop projects directly, but rather depends on the private sector to approach Public Works on developing these facilities. Public Works does have an interest in trying to enter into public private partnerships, which is the model being looked at for the Calabasas Landfill anaerobic digestion project. Ms. Landis recommended Public Works working with the County Board of Supervisors. She continued with her concerns about the need for electrical power and the fact that she is hoping Calabasas Landfill is attractive to the community.

There were no other comments on Chapter 7 from Subcommittee members.

Chapter 8 – General Plan Consistency

There were no comments on Chapter 8 from Subcommittee members.

Chapter 10 – Finding of Conformance

Mr. Mohajer noted his comments on Section 10.7.4, page 6, under Revocation of Finding of Conformance to read: "The Task Force may revoke a Finding of Conformance (FOC) if the Project proponent does not meet the conditions of the FOC. The cause of revocation shall be documented in the Notice of Revocation to the appropriate local agency with land use authority, Air Quality Management Districts, Regional Water Quality Control Board, LEA, CalRecycle, and the Project owner and operator."

Mr. Mohajer noted his comments on page 5 of Table 10-1, 3a to read: "Obtain and provide to the County all data necessary for cities in Los Angeles County and the County to comply with the mandates of AB 939 (1989) and SB 1383 (2016) by using the Los Angeles County Solid Waste Information Management System."

Mr. Mohajer noted his comments on page 7, under Permits and Documentation to add: "Environmental Justice analysis."

There were no other comments on Chapter 10 from Subcommittee members.

List of Acronyms

Ms. Landis mentioned three acronyms missing including: California Department of Food and Agriculture (CDFA), Alternative Technology (AT) and Conversion Technology (CT).

There were no other comments on List of Acronyms from Subcommittee members.

Glossary of Terms

There were no comments on Glossary of Terms from Subcommittee members.

Environmental Justice Document

On page 1 dated July 2021, Mr. Mohajer asked if the document had been adopted. Mr. Rodriguez responded that this document is part of the environmental documentation that will accompany the Countywide Siting Element document. It will go to the Board of Supervisors simultaneously for certification when they also authorize the release of the Countywide Siting Element to the cities. Mr. Mohajer asked what the role of the Task Force is for reviewing and commenting on the environmental justice (EJ) document. Mr. Mohajer elaborated on the important political issue regarding EJ and how compliance must be met in order for the Task Force to issue a FOC and that this EJ document would be used as a basis for issuing a FOC. Mr. Mohajer mentioned not reviewing the document and stated that the EJ by itself is so large and is involved in many issues. He was unaware that EJ is also included with the California Environmental Quality Act so staff may want to review. He continued that the EJ may have to also be reviewed by the Task Force if they are to use. The other option is for the Task Force to have its own EJ. Mr. Mohajer continued his comments to the EJ document and asked what the Task Force's role was. Mr. Holland responded that Public Works staff would look into the EJ document to understand the role of the Task Force. Discussion ensued regarding the EJ document and Mr. Mohajer's comments under the Background Information and Supervisorial District 5 photos including adding Antelope Valley Town Counsels, Val Verde communities, and North Valley Coalition of Concerned Citizens. Mr. Mohajer recommended staff review the redistricting of boundaries for the Supervisorial Districts to make certain they are current and the possibility someone may bring up that the data in the EJ is based on 2018 data instead of 2022. Lastly, on the last page of the EJ document, Mr. Mohajer commented on the Conclusion paragraph to read: "Effective environmental justice outreach will also aid in the adoption of the CSE by a majority of the 88 cities with the majority of the incorporated population in the County."

There were no other comments on EJ from Subcommittee members.

Ms. Landis brought up her concerns about the proposed alternative technology facilities in existing Class III Landfills, including sites in Santa Monica. She brought up the City of Carson's Dominguez Channel and the problems that will arise in trying to get something developed at that location due to the recent problems at that location. She continued with her disagreement with building a facility on the Santa Monica Pier and that Santa Monica citizens will think it is a joke. Mr. Mohajer responded that the Santa Monica Pier was proposed by the City of Santa Monica and the document was provided to Santa Monica for comments. Ms. Landis commented that there are other sites to use. Mr. Holland responded that

Public Works reached out to all the developers from the previous list of identified sites to see if they still had plans to develop those sites and some of those sites had come off the list for various reasons. Each of the potential sites listed were verified by the developer, as well as verified by the host jurisdictions as being okay to identify in the Countywide Siting Element. Ms. Landis commented that the document should give clarity and detail as to current permission for the potential sites from 2010. Mr. Holland responded that the list was current and asked Ms. Landis if she was looking at the page 358, Table 7-1. She responded that in the original document, it was noted on top of the page. Mr. Holland responded not needing to include the previous locations because the Countywide Siting Element includes the current potential locations. He offered that staff may provide Ms. Landis with an update of what happened to the potential sites that are off the list and that the list does not have to be included in the final document. Discussion ensued regarding Ms. Landis stating that the 2010 list showed fully permitted locations. She requested a footnote stating revisiting the proposed sites and that building on those sites are no longer available.

Ms. Dee Hanson-Lugo asked about the nine facilities listed and the photograph below, in that she thought the locations of the photographs would be identified. Mr. Holland responded that staff was working on identifying photographs in the document.

Ms. Landis continued with her concerns of sites being proposed at Santa Monica Pier and Dominguez Channel. Ms. Hanson-Lugo commented that she was very familiar with the list of potential sites and that the list does not necessarily say what will be built at those facilities. She also mentioned the limited space and a lot of technology available that may not result in a major project. Mr. Shammas noted that the Santa Monica Pier is only 2.5 acres, which is a tiny facility. Mr. Holland stated if anyone has questions regarding the location, they may be referred to the City of Santa Monica. Ms. Landis mentioned her concerns of the ocean rising and moving inland and into the groundwater, which is a serious problem especially within the next 15 years.

Ms. Landis did not see how the Subcommittee could concur with the draft that was given of the Countywide Siting Element. Mr. Rodriguez responded that staff could make all the corrections and could have a draft ready for the mailout in preparation for the next Subcommittee meeting on March 17, 2022, at which time the Subcommittee can review all the corrections and potentially concur in moving it up to the Task Force for review. Mr. Mohajer agreed with Mr. Rodriguez' recommendation.

Ms. Landis thanked staff for working with the Subcommittee on the Countywide Siting Element. Mr. Holland also thanked all staff.

III. PUBLIC COMMENTS

No Comments.

IV. ADJOURNMENT

The meeting adjourned at 11:02 a.m.

Facility and Plan Review Subcommittee
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force

SPECIAL MEETING
November 9, 2021

WEB CONFERENCE

Los Angeles County Public Works
900 South Fremont Avenue
Alhambra, CA 91803

SUBCOMMITTEE MEMBERS PRESENT:

Dorcas (Dee) Hanson-Lugo, County of Los Angeles Department of Public Health
Betsey Landis, Chair, Environmental Organization Representative
Carlos Ruiz, Los Angeles County Public Works
Sam Shammass, Los Angeles County Sanitation Districts

SUBCOMMITTEE MEMBERS NOT PRESENT:

Mike Mohajer, General Public Representative
Reina Pereira, City of Los Angeles

OTHERS PRESENT:

Martins Aiyetiwa, Los Angeles County Public Works
Wayde Hunter, North Valley Coalition of Concerned Citizens
Carol Oyola, Los Angeles County Public Works
Jeffrey Zhu, Los Angeles County Public Works

I. CALL TO ORDER

Ms. Betsey Landis called the meeting to order at 1:05 p.m.

II. DISCUSSION OF FPRS COMMENTS ON THE LOS ANGELES COUNTY PRELIMINARY DRAFT REVISED COUNTYWIDE SITING ELEMENT AND DRAFT ENVIRONMENTAL IMPACT REPORT

Ms. Landis noted having many comments on what needed correcting on the Los Angeles County Preliminary Draft Revised Countywide Siting Element (Draft Revised CSE) and Draft Environmental Impact Report (Draft EIR):

- Reduce reliance on out of county waste disposal, not buy more air-polluting trucks to send our solid waste to other counties.
- Need to develop local electricity facility sources and emphasis on proceeding with alternative conversion facilities for electricity.
- Re-evaluate the list of potential locations for alternative technology facility in Los Angeles County. Most sites identified are unusable (e.g., Santa Monica Pier, Santa Monica Airport, City of Carson).
- Ms. Landis also mentioned that she will provide her entire comments soon.

Mr. Sam Shammamas mentioned that the Los Angeles County Sanitation Districts is currently working on a comment letter that they plan to submit. He noted a few issues:

- Corrections on the life of Calabasas Landfill should be based on exhaustion of capacity and not the estimated closure date on their Solid Waste Facility Permit.
- To have flexibility for landfill operators, they do mention balefilling as a potential requirement. However, some landfills have physical or operational constraints that may not allow that.
- The landfill operator should have flexibility in the use of different types of covers.
- Discussion on the history of waste-by-rail and that economic viability should be mentioned as one of the issues with starting operation of the waste-by-rail system.

Mr. Ruiz provided the following comments:

- The 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. He also expressed the need to have long-term capacity to handle what is currently going to landfills.

- Developing in-County capacity through conversion technologies should be a priority but we should not close the door to the export of solid waste if that means extending the life of in-County capacity.
- Putting more emphasis on conversion technologies as a means of managing waste and derive useful products, whether electricity, fuel or other things, to help manage all of the organic waste.
- Re-evaluate the list of proposed potential locations for alternative technology facilities in Los Angeles County. These sites should at least pass some basic criteria, even though at the end, the placement or identification of a site in the document does not mean that that a facility must be developed in that location. The local jurisdiction has the ultimate authority to determine land use within its boundaries.

Ms. Dee Hanson-Lugo commented that she had not had time to read the entire Draft CSE, nor is she aware if others in Public Health have reviewed it. However, the areas that Ms. Hanson-Lugo reviewed pertained to the solid waste sections of the Local Enforcement Agency and agreed with Ms. Landis that the Draft CSE needs to be rewritten. Landfill operators have approached the Local Enforcement Agency proposing research projects on some sort of anaerobic digestion and does not know if this is triggered by cities or the County. Ms. Hanson-Lugo agreed that landfill operators will have to change the way they manage their solid waste because of SB 1383. Her belief is that it is more profitable for cities to develop a closed landfill site into a parking lot for Amazon instead of looking at those potential sites for solid waste infrastructure, and that economics has a lot to do with who will invest in what type of project.

VIII. PUBLIC COMMENTS

Mr. Wayde Hunter of the North Valley Coalition of Concerned Citizens provided the following comments:

- Landfill photo or any photos of a facility used in the document should be identified or labeled accordingly.
- Sunshine Canyon Landfill in the Draft CSE is noted as a minor landfill and should be recognized as a major landfill.
- Requested to see a summary of comments previously provided by Mr. Mike Mohajer.

Ms. Landis commented she would like to forward a motion to the Task Force about having both the Draft CSE and Draft EIR rewritten. Mr. Ruiz offered his suggestion that it would help Public Works in responding to the comments by being as specific as possible, rather than stating that it needs to be rewritten, because that may be difficult to interpret. Other Subcommittee members agreed. Ms. Landis responded that she and Mr. Mohajer had already submitted their comments and that there

were some excellent comments at today's special meeting that staff may incorporate.

Mr. Ruiz commented that the public review period was still open until November 15, 2021. Mr. Aiyetiwa indicated that the next Task Force meeting was on November 18, 2021, which was outside of the public review period. However, staff would accept Task Force comments after the public review period is over. Mr. Aiyetiwa's recommendation was for the Subcommittee to submit its collective comments to the Task Force and then the Task Force may send the comments to the County. Mr. Ruiz suggested that staff summarize the comments received today so they could be presented at next week's Subcommittee meeting and then submitted to the Task Force for consideration. His recommendation was for the Task Force to consider the submittal of comments to the County and Public Works and that staff would accept comments from the Task Force and would continue to work with the Subcommittee.

Ms. Hanson-Lugo asked if the public review period could be extended. Mr. Aiyetiwa responded that it could, but that there was no request to extend the period at the last Task Force meeting. By law, the County has 105 days after the end of the public review period to prepare written responses to comments received and prepare the final draft. Once the final draft is completed with all comments being considered, it will be sent to the Task Force for review before releasing it to the cities for local adoption.

Ms. Landis made a motion to request the Task Force, based on today's meeting comments, to have Public Works address the comments received and revise the Draft CSE and Draft EIR, accordingly. Mr. Ruiz seconded the motion for the purpose of discussion.

Mr. Aiyetiwa clarified the process that staff would be preparing a draft letter from the Task Force to the County, which will include all the comments that have been received from the Subcommittee, public, as well as Mr. Hunter's verbal comments. The draft letter will be sent to the Subcommittee for review and consideration and then the Subcommittee could forward to the Task Force for their approval to be sent to the County.

IX. ADJOURNMENT

The meeting adjourned at 3:04 p.m.

ATTACHMENT C

LOS ANGELES COUNTY PUBLIC WORKS RESPONSE TO THE LOS ANGELES COUNTY SOLID WASTE MANAGEMENT COMMITTEE/INTEGRATED WASTE MANAGEMENT TASK FORCE COMMENT LETTER DATED DECEMBER 22, 2021 REGARDING THE LOS ANGELES COUNTY PRELIMINARY DRAFT REVISED COUNTYWIDE SITING ELEMENT, DRAFT ENVIRONMENTAL IMPACT REPORT, AND ENVIRONMENTAL JUSTICE DOCUMENT



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
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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:

- **Comment #1:** 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.

Response to comment #1: Comment noted. The use of the term "solid waste disposal facility" or "disposal facility" in the Draft Revised CSE refers to landfills and transformation facilities. The use of the term "landfill" refers to Class III landfills or permitted inert waste landfills.

[See Attachment B - Chapter 1, page 1 ([link](#)) and Chapter 3, page 1 ([link](#))]

- **Comment #2:** The Draft Revised CSE must identify all Engineered Municipal Solid Waste (EMSW) in Los Angeles County, if any.

Response to comment #2: Comment noted. Currently, there are no existing or proposed new EMSW conversion facilities located in Los Angeles County; therefore, no EMSW conversion facilities are identified in the Draft Revised CSE.

[See Attachment B - Chapter 1, page 1 ([link](#)) and Chapter 7, page 5 ([link](#))]

- **Comment #3:** 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.

Response to comment #3: Comment noted. Chapter 2 Goals and Policies, Section 2.6 Countywide Siting Element Administering Agency and Funding Source (page 51) has addressed this comment.

[See Attachment B - Chapter 2, Section 2.6, page 11 ([link](#))]

- **Comment #4:** 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.

Response to comment #4: Comment noted. The County of Los Angeles continues to promote and support the development of conversion technologies within Los Angeles County. The Draft Revised CSE shows that the combination of an increase in diversion rate, development of waste diversion facilities, and use of out-of-County

landfills would address the disposal need of all the jurisdictions in the County for the 15-year planning period. Out-of-County landfill capacity is expected to be reliably available to jurisdictions within Los Angeles County for the planning period to supplement and extend the life of in-County capacity (see Chapter 2, Goals and Policies).

[see Attachment B - Chapter 2, Goals and Policies, Goal No. 6, page 7 ([link](#)) and Policy No. 8.4, page 10 ([link](#))]

- **Comment #5:** 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.

Response to comment #5: Comment noted. See response to comment #4.

- **Comment #6:** 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.

Response to comment #6: Comment noted. Recycling, composting, and energy recovery through anaerobic digestion (AD) and thermal conversion technologies (CT) are environmentally sound options for diverting solid waste. Benefits include reducing GHG emissions, replacing fossil-based energy and fuels, displacing virgin inputs to supply materials for industry, creating valuable soil amendments, and conserving resources. Ongoing source reduction efforts followed by implementation of recycling, composting, AD, and thermal CTs provides a comprehensive and sustainable solution to manage waste.

[See Attachment B - Chapter 5, pages 3 through 10 ([link](#))]

- **Comment #7:** Identify or label any image of a landfill or any photos of a facility used throughout the document.

Response to comment #7: Comment noted. Public Works staff will work with the consultant in identifying or labeling any image of a landfill or facility used throughout the document.

Specific Comments:

- **List of Acronyms**

- **Comment #8:** 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”

Response to comment #8: Comment addressed accordingly. List of Acronyms has been revised.

[See Attachment B - List of Acronyms, page 7 ([link](#))]

- **Chapter 1 – Introduction**

- **Comment #9:** 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.

Response to comment #9: Comment addressed accordingly. Chapter 1, Section 1.11 has been revised.

[See Attachment B - Chapter 1, page 21 ([link](#))]

- **Chapter 2 – Goals and Policies**

- **Comment #10:** Goals 4, 6, 7, and 8 (Policy No. 8.1): Add “environmentally appropriate”.

Response to comment #10: Comment addressed accordingly. Chapter 2, Goals 4, 6, 7, and 8 (Policy No. 8.1) has been revised.

[See Attachment B - Chapter 2, Goals No. 4, page 5 ([link](#)), Goals No. 6, page 7 ([link](#)), Goals No. 7, page 8 ([link](#)), and Goals No. 8, page 9 ([link](#))]

- **Comment #11:** 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

Response to comment #11 (a): Comment noted. The purpose of Table 2-1 is to show task implementation responsibilities for countywide responsible entities. Since the California Department of Toxic Substances Control (DTSC) and California Department of Food and Agriculture (CDFA) are State entities, a footnote is added to address this comment. It will describe DTSC’s and CDFA’s role in regulating infectious, toxic, or contaminated green waste products such as compost, soil additives, and other products from the processing of organic wastes at solid waste facilities.

Response to comment #11 (b) and (c): Comment addressed accordingly. Chapter 2, Table 2-1 has been revised.

[See Attachment B - Chapter 2, Table 2-1, page 1 ([link](#))]

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

- **Comment #12:** Section 3.1 *Purpose* and Key Terms (page 53): (1) Should include definitions of the following terms: Class I landfill, Class II landfill, Class III Landfill, and EMSW. (2) 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." (3) These terms should also be defined in the Glossary of Terms.

Response to comment #12 (1): Comment noted. “Key Terms” are used for defining terms that are commonly or widely used throughout the document. However, the Glossary of Terms has been updated to include definitions of Class I and II Landfills.

Response to comment #12 (2) and (3): Comment addressed accordingly. Chapter 3, Section 3.1 and the Glossary of Terms has been revised.

[See Attachment B - Chapter 3, page 1 ([link](#)) and Glossary of Terms, page 7 ([link](#))]

- **Comment #13:** 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.”

Response to comment #13: Comment addressed accordingly. Chapter 3, Table 3-1 has been revised.

[See Attachment B - Chapter 3, Table 3-1 ([link](#)) and Map 3-1 ([link](#))]

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

- **Comment #14:** 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.

Response to comment #14: Comment noted, and the remaining capacity of Sunshine Canyon Landfill (SCL) has been verified. SCL’s Conditional Use Permit (CUP), Condition 17A, has a termination requirement of 30 years from the approval date of 2007 (2037 closure). The CUP also states, “In no event shall the termination date be later than 30 years from the Approval Date.”

- **Comment #15:** 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.

Response to comment #15: Comment noted. The County of Los Angeles continues to work with site owners, cities, and other stakeholders to consider the feasibility of siting alternative technologies at in-County landfills and other locations.

- **Comment #16:** Solid waste projections should exclude the influence of Alternative Technologies in decreasing the disposal of solid waste.

Response to comment #16: Comment noted. Table 4-6 projects solid waste disposal capacity requirements. It includes the available transformation capacity at the Southeast Resource Recovery Facility in Long Beach, but it does not consider the impact of non-combustion thermal conversion

technologies in decreasing the disposal capacity requirements of solid waste, because such technologies would be considered disposal under State law.

- **Comment #17:** 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.

Response to comment #17: Comment noted. Figure 4-4 projects solid waste disposal capacity, including the impacts of alternative technologies on disposal demand. The Draft Revised CSE acknowledges that alternative technologies are beneficial because they can produce renewable electricity from solid waste; however, renewable energy production has no bearing on solid waste disposal capacity needs and should not be considered in Figure 4-4.

- **Comment #18:** 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.

Response to comment #18: Comment addressed accordingly. Chapter 4, Table 4-14 (yellow column) has been re-labeled to read “Imports from other Counties”.

[See Attachment B - Chapter 4, Table 4-14 ([link](#))]

- **Comment #19:** Table 4-16 (page 221) - *Scenario VI - Increase in Exports to Out-of-County Landfills (Excluding Potential Waste-by-Rail Capacity)*: Ignores Alternative Technologies.

Response to comment #19: Comment noted. Table 4-16 includes non-combustion thermal conversion technologies as part of disposal demand, because these technologies are considered disposal per State law.

- **Chapter 5 – Alternative Technologies**

- **Comment #20:** 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.

Response to comment #20: Comment noted. The information on this table is based on a report titled “Evaluation of Conversion Technology Processes and Products, University of California, Riverside and University of California, Davis”.

Any suggested revisions to this document are beyond the scope of the CSE Revision Project.

- **Comment #21:** 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.

Response to comment #21: Comment noted. 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 are programs led and adopted by the City of Los Angeles Department of Public Works, Bureau of Sanitation and are referenced in the Draft Revised CSE as part of City of Los Angeles Alternative Technology Efforts. Any suggested revisions to these documents are beyond the scope of the CSE Revision Project.

- **Comment #22:** 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.

Response to comment #22: Comment noted. 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 are plans adopted by the City of Los Angeles, Bureau of Sanitation in 2006, and are referenced in the CSE document as part of City of Los Angeles Alternative Technology Efforts. Any suggested revisions to these documents are beyond the scope of the CSE Revision Project.

- **Chapter 6 – Facility Siting Criteria**

- **Comment #23:** Include a map for Antelope Valley Air Quality Management District.

Response to comment #23: Comment addressed accordingly. Antelope Valley Air Quality Management District map has been included as new Figure 6B-2. The existing Figure 6B-2 Regional Water Quality Control Board Jurisdiction Map will now be labeled as “Figure 6B-3”.

[See Attachment B - Chapter 6, Figure 6B-2 ([link](#))]

- **Comment #24:** Section 6.3 *Specific Requirements*: Pending enactment of appropriate state law, remove the write-up referencing PRC Section 44004 (h) (1).

Response to comment #24: Comment addressed accordingly. Chapter 6, Section 6.3 has been revised.

[See Attachment B - Chapter 6, page 2 ([link](#))]

- **Comment #25:** Table 6B-1 *List of Regulating, Permitting and Responsible Agencies*: Should update table with current information.

Response to comment #25: Comment addressed accordingly. Chapter 6, Table 6B-1 has been updated.

[See Attachment B - Chapter 6, Table 6B-1([link](#))]

- **Comment #26:** 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.

Response to comment #2: Comment noted. Verbiage is taken straight from the regulation.

- **Comment #27:** 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.

Response to comment #27: Comment addressed accordingly. Chapter 6, Section 6.4.1 has been revised.

[See Attachment B - Chapter 6, page 3 ([link](#))]

- i. Add new bullet: “Produce electricity and other marketable products of transformation of solid waste.”

Response to comment #27 (i): Comment noted. Adding this new objective does not appear to be a “criteria” to site a solid waste disposal facility. This new objective places landfills at a disadvantage since producing electricity is not the goal of landfills but a secondary beneficial outcome based on market incentives. Ability to produce electricity or other marketable products of transformation as a criteria is counterproductive to ensuring adequacy of disposal capacity as required by AB 939. Also, any addition to the Siting Criteria would require Task Force to amend and approve the Siting Criteria established in the CSE.

- o **Comment #28:** Section 6.4.2.2 *Ministerial Permits*: Expand to include Waste Discharge Requirement Permit

Response to comment #28: Comment noted. Waste Discharge Requirement is already listed under the Discretionary Permit section.

[See Attachment B - Chapter 6, page 5 ([link](#))]

- o **Comment #29:** 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.

Response to comment #29: Comment noted. All solid waste disposal facilities (including transformation facilities) must have a Finding of Conformance (FOC) with the CSE, as described in Chapter 10 of the CSE. Solid waste disposal facilities (including transformation facilities) which experience a significant change in operation, as defined in Chapter 10, are also required to obtain a revised FOC with the CSE or Countywide Integrated Waste Management Plan. Furthermore, the County (through the Task Force), has ensured that the Siting Criteria contained in the CSE are applied and that disposal facilities ((including transformation facilities) are in conformance with the CSE through the FOC process.

[See Attachment B - Chapter 6, page 18 ([link](#))]

- o **Comment #30:** 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.

Response to comment #30: Comment addressed accordingly. Chapter 6, Section 6.6.8 has been revised.

[See Attachment B - Chapter 6, page 22 ([link](#))]

- **Comment #31:** Figure 6B-1 South Coast Air Quality Management District Map: Make sure accuracy of number labels for General Forecast and Monitoring Areas.

Response to comment #31: Comment noted. The map and its contents are provided by South Coast Air Quality Management District. Therefore, revisions to the map and its contents are outside the scope of the CSE Revision Project.

- **Comment #32:** 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 CDFG.

Response to comment #32: Comment noted. Current state law and regulations do not include composting as a solid waste disposal facility. Therefore, composting products and operations are not included in the Siting Criteria. Also, see response to comment #27 (i).

- **Comment #33:** Table 6B-1 List of Regulating, Permitting and Responsible Agencies: Add DTSC and CDFG, and California Public Utilities Commission under (CPUC) "State Agencies" and "Los Angeles County Agricultural Commission".

Response to comment #33: Comment addressed accordingly. Chapter 6, Table 6B-1 has been revised.

[See Attachment B - Chapter 6, Table 6B-1 ([link](#))]

- **Chapter 7 – Proposed In-County Facility Locations and Descriptions**

Comment #34: 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 (Southeast 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.

Response to comment #34: Comment addressed accordingly. Chapter 7, Section 7.7 has been revised.

[See Attachment B - Chapter 7, page 3 ([link](#))]

- **Comment #35:** 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.

Response to comment #35: Comment addressed accordingly. Chapter 7, Section 7.8 has been revised.

[See Attachment B - Chapter 7, pages 3 through 5 ([link](#))]

- **Comment #36:** 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.

Response to comment #36: Comment noted. The County is working with the Alternative Technology Advisory Subcommittee (ATAS) of the Task Force to investigate and promote conversion technologies, including actively pursuing the development of one or more demonstration facilities in Southern California. This process began with Phase I, in which the County and ATAS conducted a preliminary evaluation, screening, and ranking of conversion technology companies and identification of material recovery facilities and transfer stations

(MRF/TS) that could potentially host a conversion technology facility. Phase II consisted of a detailed evaluation of selected technologies and MRF/TS sites. It is also noted that the fact that an area or location is identified in the Draft Revised CSE as potentially suitable for siting an alternative technology facility (e.g., conversion technology) does not automatically mean that an alternative technology facility will be sited at that area or location.

[See Attachment B - Chapter 7, pages 4 and 5 ([link](#))

- **Chapter 8 – General Plan Consistency**

- **Comment #37:** See comment on Chapter 7, Section 7.8 *Alternative Technology Facilities* above.

Response to comment #37: Comment noted. See response to comment #35.

[See Attachment B - Chapter 7, pages 3 through 5 ([link](#))

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

- **Comment #38:** 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.

Response to comment #38: Comment noted. Reducing solid waste disposal, whether within or outside of the County, is a priority for Public Works. Alternative technology facilities located within the County can produce electricity from solid waste and reduce the transportation of solid waste to out-of-County landfills, thereby reducing air pollution. However, as the disposal capacity within the County continues to diminish, and the siting of new and/or expansion of existing Class III landfills becomes increasingly difficult, development of out-of-County disposal becomes more essential to supplement in-County disposal capacity. This Chapter describes how jurisdictions in the County may utilize out-of-County Class III landfills in California, to offset the deficiency of in-County disposal capacity and meet their solid waste management goals during the 15-year planning period.

- **Comment #39:** 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!

Response to comment #39: Comment noted. Since there is only one transformation facility in the County, a large percentage of solid waste may need to be exported out of County for disposal until sufficient alternative technology facilities can be developed within the County.

- **Comment #40:** 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.

Response to comment #40: Comment noted. Daily emissions from exporting solid waste to out-of-County landfills and the amount of electricity and compost that could be produced from the exported waste was estimated in Comparative Greenhouse Gas Emissions Analysis of Alternative Scenarios for Waste Treatment and/or Disposal commissioned by Public Works in 2016.

- **Chapter 10 – Finding of Conformance**

- **Comment #41:** 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:"

Response to comment #41: Comment noted. Verbiage is taken straight from the regulation.

- **Comment #42:** 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.

Response to comment #42: Comment addressed accordingly. Chapter 10, Section 10.1 has been revised.

[See Attachment B - Chapter 10, page 1 ([link](#))]

- **Comment #43:** 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.

Response to comment #43: Comment addressed accordingly. Chapter 10, Table 10-1 has been revised.

[See Attachment B - Chapter 10, Table 10-1, page 2 ([link](#))]

- **Comment #44:** 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.

Response to comment #44: Comment addressed accordingly. Chapter 10, Table 10-1 has been revised.

[See Attachment B - Chapter 10, Table 10-1, page 5 ([link](#))]

- **Comment #45:** 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."

Response to comment #45: Comment addressed accordingly. Chapter 10, Table 10-1 has been updated to read "Support the host jurisdiction's and the Countywide Operational Area Mass Debris Removal and Recycling Plan and Programs."

[See Attachment B - Chapter 10, Table 10-1, page 5 ([link](#))]

- **Environmental Justice Document**

- **Comment #46:** Include the community of Val Verde in the Environmental Justice Document.

Response to comment #46: Comment addressed accordingly. The Environmental Justice Document has been revised to include the community of Val Verde.

[See Attachment B - Environmental Justice document, page 14 ([link](#))]

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

Mr. Coby Skye
December 22, 2021
Page 16

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 or (909) 592-1147.

Sincerely,

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

JB:

C:\Users\jbartolata\Desktop\Task Force Comment Letter on Draft Revised CSE and DEIR_12.21.2021.docx

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

ATTACHMENT D

**MINUTES OF MEETINGS OF THE LOS ANGELES COUNTY SOLID WASTE
MANAGEMENT COMMITTEE/INTEGRATED WASTE MANAGEMENT TASK FORCE
AND ITS FACILITY AND PLAN REVIEW SUBCOMMITTEE REGARDING
CONSIDERATION OF CONCURRENCE WITH THE FINAL DRAFT REVISED
LOS ANGELES COUNTY COUNTYWIDE SITING ELEMENT**

Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force

Minutes for March 17, 2022

Los Angeles County Public Works
900 South Fremont Avenue
Alhambra, California

WEB CONFERENCE

COMMITTEE MEMBERS PRESENT:

Margaret Clark, League of California Cities
Eddie De La Riva, League of California Cities
Mike Mohajer, General Public Representative
Jordan R. Sisson, Los Angeles County Disposal Association

COMMITTEE MEMBERS REPRESENTED BY OTHERS:

Robert Ferrante, rep by Sam Shammass, Los Angeles County Sanitation Districts
Barbara Ferrer, rep by Dorcas (Dee) Hanson-Lugo, Los Angeles County Public Health
Bernadette Halverson, rep by Reina Pereira, City of Los Angeles Bureau of Sanitation
Eric Lopez, rep by Erin Rowland, Long Beach Public Works
Wayne Nastri, rep by Jack Cheng, South Coast Air Quality Management District
Mark Pestrella, rep by Patrick Holland, Los Angeles County Public Works

COMMITTEE MEMBERS NOT PRESENT:

Michelle Chambers, League of California Cities
Jeff Farano, Institute of Scrap Recycling Industries
Betsey Landis, Environmental Organization Representative
Rafael Prieto, City of Los Angeles
Jim Smith, City of Los Angeles

OTHERS PRESENT:

Whitney Amaya, East Yard Communities for Environmental Justice
Charles Darensbourg, Los Angeles County Public Works
Wayde Hunter, North Valley Coalition of Concerned Citizens
Dave Nguyen, Los Angeles County Public Works
Carol Oyola, Los Angeles County Public Works
Kartik Raj, Earthjustice
Aric Rodriguez, Los Angeles County Public Works
Coby Skye, Los Angeles County Public Works
Christopher Sheppard, Los Angeles County Public Works
Kawsar Vazifdar, Los Angeles County Public Works
Jeffrey Zhu, Los Angeles County Public Works

I. CALL TO ORDER

Meeting called to order at 1:04 p.m. by Mr. Sam Shammass.

II. APPROVAL OF THE FEBRUARY 17, 2022 MINUTES

Mr. Mike Mohajer made a motion to approve the minutes, and Ms. Margaret Clark seconded. Motion passed with one abstention.

Mr. Shammass stated moving up those agenda items needing to be voted on since Ms. Clark had to leave the meeting early and quorum was needed. Agenda items to be moved included Consideration of Concurrence with the Final Draft Revised Los Angeles County Countywide Siting Element (CSE) and the Legislative Update.

III. CONSIDERATION OF CONCURRENCE WITH THE FINAL DRAFT REVISED LOS ANGELES COUNTY COUNTYWIDE SITING ELEMENT

A motion was made by Mr. Mohajer for the Task Force to concur with the Final Draft Revised CSE that was reviewed by the Facility and Plan Review Subcommittee (FPRS) and to write a letter to Public Works (PW) stating the Task Force reviewed the document, all comments were addressed from the December 22, 2021, letter, and the Task Force concurred with the revisions to the document. Mr. Patrick Holland seconded. The motion passed with one abstention.

IV. LEGISLATIVE UPDATE

Mr. Sheppard provided the legislative update and noted the following key dates, February 18, 2022, was the last day for new bills to be introduced, spring recess will begin on April 7, 2022, and the Legislature will reconvene on April 18, 2022. Legislators have until April 29, 2022, to pass any fiscal-related bills out of their policy committees, and May 6, 2022, is the last day to pass any non-fiscal bills out of their house of origin. There were 53 bills on the [Legislative Table](#). Mr. Sheppard highlighted six bills on the cover page:

- AB 1747 (Quirk) – Contractors: Disciplinary Action. Mr. Mohajer made a motion to support, and Ms. Margaret Clark seconded. Motion passed with one abstention.
- AB 1985 (Robert Rivas) – Organic Waste: List: Available Products. Mr. Mohajer made a motion to support, and Ms. Clark seconded. Motion passed with one abstention.

- AB 2048 (Santiago) – Solid Waste: Franchise Agreements: Database. Mr. Mohajer made a motion to support, and Ms. Reina Pereira seconded. Motion passed with two abstentions.
- AB 2374 (Bauer-Kahan) – Crimes Against Public Health and Safety: Illegal Dumping. Mr. Mohajer made a motion to support, and Ms. Pereira seconded. Motion passed with one abstention.
- SB 833 (Dodd and Stern) – Community Energy Resilience Act of 2022. Mr. Mohajer made a motion to support, and Ms. Clark seconded. Motion passed with one abstention.
- SB 1187 (Kamlager) – Fabric Recycling: Pilot Project. Mr. Mohajer made a motion to support, and Ms. Pereira seconded. Motion passed with two abstentions.

V. REPORT FROM THE ALTERNATIVE TECHNOLOGY ADVISORY SUBCOMMITTEE (ATAS)

Mr. Chris Sheppard reported that the ATAS received presentations from PW and Tetra Tech. PW provided a demonstration of resources on the [Southern California Conversion Technology website](#) and an overview of the [Enhancing Countywide Solid Waste Management Programs and Infrastructure Report](#). Tetra Tech provided information on feasibility analyses for potential organic waste processing facilities at four closed landfill sites in LA County. Both reports will be available on the March ATAS minutes on the [Task Force website](#).

Tetra Tech is supporting PW with Senate Bill 1383 planning efforts, evaluating the potential to develop organic waste processing facilities at closed landfill sites, and helping to prepare the draft Calabasas anaerobic digestion facility request for proposal that will be released in the next few weeks. Tetra Tech also finalized the anaerobic digestion fact sheets for PW.

There was an update on upcoming conversion technology events and conferences that may also be found in the [Conversion Technology Newsletter](#).

- SWANA SOAR 2022: March 21-24, 2022, Kansas City, MO
- CEAC Spring Conference 2022: March 23-25, 2022, Monterey, CA
- SWANA 51st Annual Western Regional Symposium: April 4-7, 2022, Fish Camp, CA
- Tcbiomass: April 19-21, 2022, Denver, CO
- NACE Annual Conference 2022: April 24-27, 2022, Buffalo, NY
- Waste Expo 2022: May 9-12, 2022, Las Vegas, NV

- RNG Summit 2022: May 17-19, 2022, Houston, TX
- Biogas Americas 2022: May 23-26, 2022, Las Vegas, NV
- VerdeXchange 2022: June 19 – 21, 2022, Los Angeles CA

Mr. Wayne Hunter asked if there was any disclaimer on the website regarding endorsement of processes for the various entities and respective technologies listed. Mr. Sheppard responded he would double check but believed there is a statement to that effect.

VI. REPORT FROM THE FACILITY AND PLAN REVIEW SUBCOMMITTEE (FPRS)

Mr. Mohajer reported on the FPRS meeting:

- As discussed in Item III, the FPRS reviewed and concurred with the CSE.
- Chiquita Canyon Landfill lawsuits remain status quo with continued postponements of trial dates.
- Sunshine Canyon Landfill (SCL) had 84 odor complaints in February 2022, and 1 Notice of Violation issued by the Southcoast Air Quality Maintenance District.
- Discussion on the permitted daily tonnage at SCL and the impact pertaining to the daily cover on Saturdays when the landfill is closed until Monday morning, which is the requirement under the Conditional Use Permit. PW is working with Republic Services on compliance.
- Due to time constraint, the update on Finding of Conformance was postponed to next month.
- There was one public comment by Mr. Hunter regarding SCL operators not using soil on Saturdays to cover the landfill after the facility closes.

VII. LOS ANGEES COUNTY TIMESHEET POLICY

Update was postponed until next month due to most Task Force members receiving stipends unable to attend today's Task Force meeting.

VIII. CALRECYCLE UPDATE

There was no update due to CalRecycle's representative unable to attend today's Task Force meeting. Staff will disseminate the monthly CalRecycle Update for March 2022 to the Task Force after the meeting.

IX. PUBLIC COMMENT

There were public comments from Mr. Kartik Raj of Earthjustice and Ms. Whitney Amaya of East Yard Communities for Environmental Justice

about letters their organizations submitted to the Task Force regarding AB 1857. Their organizations are requesting the Task Force to remove their opposition and support Assembly Bill 1857. Both Mr. Raj and Ms. Amaya shared their respective concerns regarding the Southeast Resource Recovery Facility in Long Beach. Mr. Shammass thanked both Mr. Raj and Ms. Amaya for their comments and stated that the Task Force would review their respective submittals.

X. ADJOURNMENT

The meeting adjourned at 1:51 p.m. The next meeting is scheduled to be held on Thursday, April 21, 2022, at 1 p.m.

Facility and Plan Review Subcommittee
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force

March 17, 2022

WEB CONFERENCE

Los Angeles County Public Works
900 South Fremont Avenue
Alhambra, CA 91803

SUBCOMMITTEE MEMBERS PRESENT:

Mike Mohajer, General Public Representative
Dorcas (Dee) Hanson-Lugo, County of Los Angeles Department of Public Health
Patrick Holland, Los Angeles County Public Works
Sam Shammass, Los Angeles County Sanitation Districts

SUBCOMMITTEE MEMBERS NOT PRESENT:

Betsey Landis, Chair, Environmental Organization Representative

OTHERS PRESENT:

Joe Bartolata, Los Angeles County Public Works
Tim Fargo, City of Los Angeles
Michael Harmon, Los Angeles County Public Works
Ramon Herman, Los Angeles County Public Works
Wayde Hunter, North Valley Coalition of Concerned Citizens
Omid Mazdidasni, Los Angeles County Public Works
Dave Nguyen, Los Angeles County Public Works
Carol Oyola, Los Angeles County Public Works
Trishena Robinson, Los Angeles County Public Works
Gladys Rietze, Los Angeles County Public Works
Aric Rodriguez, Los Angeles County Public Works
Chris Sheppard, Los Angeles County Public Works
Carlos Slythe, Los Angeles County Public Works
Dave Thompson, Sunshine Canyon Landfill-Local Enforcement Agency
Jeffrey Zhu, Los Angeles County Public Works

I. CALL TO ORDER

Mr. Mike Mohajer called the meeting to order at 11:11 a.m. as Ms. Betsey Landis, Chair, had technical difficulty logging into meeting.

II. APPROVAL OF MINUTES FROM THE FEBRUARY 17, 2022 MEETING

Mr. Patrick Holland made a motion to approve the February 17, 2022 Minutes, as corrected, and Mr. Sam Shammass seconded. Motion passed unanimously.

III. APPROVAL OF MINUTES FROM THE FEBRUARY 25, 2022 SPECIAL MEETING

Mr. Holland made a motion to approve the February 25, 2022 Special Meeting Minutes, as corrected, and Mr. Shammass seconded. Motion passed unanimously.

IV. CONSIDERATION OF CONCURRENCE WITH THE FINAL DRAFT REVISED LOS ANGELES COUNTY COUNTYWIDE SITING ELEMENT

Mr. Joe Bartolata, staff to the Task Force, provided an overview of the Final Draft Revised Los Angeles County Countywide Siting Element (CSE).

On December 22, 2021, the Task Force sent a letter to Public Works (PW) transmitting Task Force's comments on the Preliminary Draft Revised CSE.

On February 25, 2022, the Facility and Plan Review Subcommittee held a Special Meeting to discuss PW draft responses to comments received and the proposed revisions to the Draft Revised CSE and its environmental document. PW staff reviewed all comments received, including those made at the Special Meeting and made appropriate changes to the documents. The proposed revisions to the document were provided to this Subcommittee for consideration. In addition, staff notified the Subcommittee and the Task Force of the following updates:

- Chapter 3, Table 3-1 (Summary of Existing Class III Landfills, Permitted Inert Waste Landfill, and Transformation Facilities in Los Angeles County) to address comments submitted by Mr. Steve Cassulo, and
- Chapter 7, Table 7-3 (Proposed Potential Locations for Alternative Technology Facilities in Los Angeles County) to remove two sites in the City of Carson as requested by the City and facility owner, and to add a new potential location as requested by a developer in the unincorporated area near Sylmar.

Staff requested this Subcommittee consider the responses to comments received and the proposed revisions to the Draft Revised CSE and recommended forwarding this item to the main Task Force for their consideration. Upon Task Force consideration, the next step is to prepare the Final Draft Revised CSE and its

environmental documents, which will include in the appendix, the responses to all written and oral comments received during the public review period and the proposed revisions to the documents. PW will then place an item on the Los Angeles County Board of Supervisors' (Board) agenda requesting certification of the Environmental Impact Report, and authorization to release the Final Draft Revised CSE to the cities for local adoption. A copy of the Final Draft Revised CSE will be sent to the Task Force, each incorporated city in the county, each Local Enforcement Agency (LEA) in the county, applicable associations of governments, and the Los Angeles Regional Agency (LARA). Staff will continue to provide updates to the Subcommittee and the Task Force as progress is moved forward.

Mr. Mohajer asked if LARA had provided any comments to the CSE. Mr. Bartolata responded that they had not provided any comments. Mr. Mohajer commented that LARA should be aware that once the CSE goes to the Board, they will not have another chance to comment on the CSE. Mr. Mohajer also extended his appreciation to PW staff on their hard work on the CSE because it is a very complicated issue. Mr. Holland responded with gratitude on behalf of PW staff, recognizing their tireless efforts on the revision of the document over the years. Mr. Mohajer shared the following comments on the document, as a follow-up to his comments from the Special Meeting:

- Page 12: permitted inert waste landfill should be defined in the glossary.
- Page 13: crossed out "waste to energy" on the photo to make politically safer since some may consider as incineration.
- Page 38: under Policy 7.1, inserted the word "introduce" before support and promote.
- Page 43: under Goal No. 1, Policy 1.3, change Task Force logo from A to S.
- Page 47: under Goal 6.2, insert the word "introduce, support" and change logo from S to L.
- Page 51: at the end of the first sentence after CSE, insert "as well as providing for the Task Force staffing."
 - Mr. Mohajer asked Mr. Holland if there was a reason to note tipping fee surcharges. Mr. Holland responded that he did not know the history of it being included. Mr. Mohajer stated if the plan was to raise the existing solid waste management fees, then it could be done by the Board. However, if the monthly waste collections are going to be raised, then it will be very difficult to do because of the 17 franchises in the City of Los Angeles and residents paying different amounts and having to gain approval from City Council. Mr. Holland responded that PW staff will review.
- Page 63: the map shows SCL as an existing minor Class III landfill and must be changed to existing major landfill.
- Page 87: on map of Scholl Canyon landfill, the freeway needs to be changed from 136 to 134.

Mr. Aric Rodriguez commented the confusion may be due to the original document that Mr. Mohajer was looking at did not reflect the changes yet. The revisions that were made were in draft form, which is why staff pulled out those segments so that the Subcommittee could review those sections pertaining to the Subcommittee's comments. Mr. Rodriguez also noted that staff had addressed most of the comments.

Mr. Holland made a motion to have the Task Force consider the next steps for the CSE, which would be to have the Board certify the Environmental Impact Report and have it released to the cities. Before the vote on the motion, Mr. Mohajer commented on how the cover page that shows corrections on Attachment A will be addressed, which were referenced in the December 22, 2021, letter to PW from the Task Force. Mr. Mohajer suggested a draft letter and made reference to the December 22, 2021, letter as an attachment and indicating that PW and the Task Force met on February 17, February 25, and March 17, 2022, and that all issues were addressed and that the Task Force had no further comments or concerns with the document and concurred with the Final Draft Revised CSE. Mr. Holland agreed and added the detail to his motion. Mr. Shammas seconded. Motion passed unanimously.

V. UPDATE ON SITING CONVERSION TECHNOLOGY FACILITIES

Due to time constraint of the meeting and the fact that this item was requested by Ms. Landis, Mr. Holland suggested to the Subcommittee to postpone this item until next month so Ms. Landis may be present. All Subcommittee members concurred with the suggestion.

VI. UPDATE ON CHIQUITA CANYON LANDFILL

Mr. Omid Mazdidasni, as staff to the Task Force, provided an update on Chiquita Canyon Landfill (CCL) odor complaints, lawsuits and Notice of Violations (NOVs).

Odor Complaints and NOVs

South Coast Air Quality Management District (AQMD) agreed to provide odor complaint data on a quarterly basis. The next update will be available in April 2022.

Update on Lawsuits

CCL filed two different lawsuits against the County.

- The first lawsuit was filed on October 20, 2017, challenging operational conditions and fee conditions of the Conditional Use Permit (CUP). The parties are currently engaged in settlement discussions.

- The second lawsuit was filed on April 13, 2018, challenging a decision by the hearing officer that upheld an NOV issued by Regional Planning on December 11, 2017, for failure to pay Bridge and Thoroughfare Fees, accepting prohibited auto shredder waste, and failure to pay out-of-area fees. The trial date was rescheduled to June 2022.

Task Force Request for CCL to Submit a Report regarding NOVs Received

- CCL submitted their Eleventh Monthly Update on March 1, 2022, which was disseminated to the Task Force on March 8, 2022. The update addressed the April 19, 2021 letter's requirements, which encouraged the Landfill to work with regulatory agencies to get back into compliance with the Landfill's respective permits and for the Landfill to submit monthly updates on the status of the NOVs. The Eleventh Monthly Update also included updates on implementation of Conditions 68 (status of air quality monitoring for surrounding communities), 77 (relocation of the site entrance from Henry Mayo Drive to Wolcott Drive), and 79 (schedule of the Street Improvement project), as well as the Stipulated Order for Abatement from AQMD.
- CCL did not receive any NOVs for February 2022.

VII. UPDATE ON SUNSHINE CANYON CITY/COUNTY LANDFILL

Odor Complaints

Mr. Vu Truong, staff to the Task Force, provided an update on the [odor complaints from the AQMD](#) for the month of February 2022.

- During the month of February 2022, 84 complaints were made to the AQMD hotline. Of those, 9 were classified as Trash, 19 were listed as Landfill Gas, and the rest were listed as No Field Response and None, which meant the inspector visited the site and did not detect any odor.
- Compared to January 2022, the number of complaints received in February 2022 decreased from 158 to 84 complaints.
- Compared to February 2021, the number of complaints for February 2022 increased from 10 to 84 complaints.
- As of March 4, 2022, AQMD issued 1 NOV related to odor for the month of February 2022.
- According to the AQMD report, the total number of complaints received during 2022 is 242.

Mr. Wayde Hunter of the North Valley Coalition of Concerned Citizens shared his concern regarding Sunshine Canyon Landfill (SCL) claiming a shortage of cover soil and that SCL had not been applying soil on the weekends. He stated that PW should monitor SCL's compliance. He asked if SCL was applying soil.

Mr. David Nguyen responded that PW has been monitoring SCL weekly since February 2022 and the Landfill has not been able to comply. He stated that PW is working with other regulatory agencies and will be taking appropriate action, as needed. PW will have more updated information to provide at the following meeting.

Mr. Mohajer commented that the conditions were put into the permit because of the Landfill being located so close to the community. From a private citizen's standpoint and as a member of the Task Force, he thinks that SCL is violating their permit and should be given an NOV with a penalty imposed.

Permitted Tonnage Capacity

Ms. Gladys Rietze, staff to the Task Force, provided a report on the permitted tonnage capacity of SCL. The Subcommittee requested at last month's February 17, 2022 meeting, for staff to report on the Landfill's allowable tonnages and to confirm the tonnage data for January 2022.

Conditional Use Permit

Under Condition 21.A of the Joint SCL CUP, the Landfill is allowed a daily tonnage capacity of 12,100 tons for all materials received at the Landfill, or more specifically, a maximum weekly tonnage capacity of 66,000 tons of Solid Waste and a maximum of 6,600 tons of Inert Debris and Beneficial Use Materials. There is no provision in the CUP for a daily capacity of either material type, only the permitted daily tonnage capacity.

Republic's Tonnage Report

Based on the January 2022 Monthly Tonnage Report prepared by Republic Services:

- On January 19, 2022, SCL reported the total inbound material received for the day was approximately 11,184 tons, which did not exceed the daily capacity of 12,100 tons per day as stated in CUP.
- The week of January 17 to January 22, 2022, SCL reported the total inbound material received was approximately 52,375 tons, which did not exceed the weekly capacity of 72,600 tons per week as stated in the CUP. The total municipal solid waste (MSW) received was approximately 43,148 tons, which did not exceed the 66,000 tons per week as stated in the CUP. The total Beneficial Use received was approximately 645 tons, which did not exceed the 6,600 tons per week as stated in CUP.
- On January 31, 2022, SCL reported the total inbound material received for the day was approximately 11,270 tons, which did not exceed the daily capacity of 12,100 tons per day as stated in the CUP.
- The week of January 31 to February 5, 2022, SCL reported the total inbound material received was approximately 56,205 tons, which did not exceed the

weekly capacity of 72,600 tons per day as stated in the CUP. The total MSW received was approximately 45,280 tons, which did not exceed the 66,000 tons per week as stated in the CUP. The total Beneficial Use received was approximately 1,062 tons, which did not exceed the 6,600 tons per week as stated in CUP.

PW reviews SCL's tonnage data on a monthly basis. Based on reported tonnages for the month of January 2022, SCL did not exceed the allowable daily and weekly tonnage limits during noted dates. PW also monitors other landfill tonnages to ensure they are in compliance with their respective permitted tonnages under their CUP.

Mr. Mohajer requested that the staff report Ms. Rietze provided be forwarded to the Subcommittee.

Mr. Hunter commented that the monthly SCL report provided to the LEA does not include a breakdown of the soil and trash. He also questioned if the soil was considered Beneficial Reuse or trash. Ms. Rietze responded that soil material may be classified by the facility as MSW or Beneficial Use based on the materials usage onsite. The Landfill Operator is responsible for appropriately categorizing the material as used or disposed. Mr. Mohajer requested the Landfill Operator's report to be included with staff's report.

Mr. Hunter commented that the LEA's report lists imported soil as trash, and stated Mr. Chris Coyle, of Republic Services, showed him another report that itemized the soil usage. Mr. Hunter asked staff if they receive that report as well. Mr. Nguyen confirmed that staff also received and monitored the SCL reports.

In addition to the CUP tonnage limits for SCL on the staff report, Mr. Mohajer also requested staff to identify the tonnage limits established in the Finding of Conformance.

VIII. DISCUSSION OF FOC REPORTS

Due to time constraints, the update on FOC reports was postponed to next month.

IX. PUBLIC COMMENTS

No public comment.

IX. ADJOURNMENT

The meeting adjourned at 12:18 p.m. The next meeting is tentatively scheduled for April 21, 2022, at 11 a.m.