



GAIL FARBER  
CHAIR

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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November 24, 2009

Ms. Margo Reid Brown, Chair  
California Integrated Waste Management Board  
1001 I Street  
Sacramento, CA 95812-2815

Dear Ms. Brown:

**COMMENTS REGARDING PROPOSED REGULATIONS ON LONG-TERM  
POSTCLOSURE MAINTENANCE AND CORRECTIVE ACTION COST ESTIMATES  
AND FINANCIAL ASSURANCE DEMONSTRATIONS FOR LANDFILLS  
(RELEASED NOVEMBER 10, 2009)**

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, I would like to commend the California Integrated Waste Management Board (CIWMB) for its efforts in developing the proposed regulations to strengthen the existing regulations on long-term postclosure maintenance and corrective action cost estimates, and financial assurance mechanisms for landfills. We have reviewed the proposed regulations amending Title 27 of the California Code of Regulations, Division 2, Subdivision 1, and would like to offer the following comment:

**Section 22211, CIWMB - Amount of Required Coverage**

- Subsection (a)(2)(C)(2) – Page 21, Lines 22-25 – The requirements specified for the “proactive monitoring program” should be expanded to include maintenance of landscaping and vegetation in accordance with a CIWMB approved postclosure plan. Proper maintenance of landscaping and vegetation would reduce soil erosion and slope failure, thereby preserving the integrity of landfill final cover. In addition, maintenance of landscaping and vegetation could enhance the aesthetics of the closed landfill site and mitigate visual impacts. For landfills located in an urbanized area such as Los Angeles County, this could be of particular importance to the surrounding communities. If an owner/operator cannot show diligence in maintaining landscaping and vegetation as detailed in its postclosure plan, the owner/operator should not be eligible for a reduction in the level of financial assurance.

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Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in the Los Angeles County with a combined population in excess of ten million. 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, waste management industry, environmental groups, the public, and a number of other governmental agencies.

The Task Force appreciates your consideration and looks forward to our continued collaboration to ensure the effective operation and long-term maintenance of landfills in order to protect public health and safety and the environment. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Sincerely,



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

JB:lb

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cc: Each Member of the California Integrated Waste Management Board  
Executive Director, California Integrated Waste Management Board (Mark Leary)  
California Integrated Waste Management Board (Mark Leary, Ted Rauh, Scott Walker, Richard Castle, Robert Holmes)  
Assembly Bill 2296 Consulting Group  
Each Member of the Los Angeles County Board of Supervisors  
Each City Mayor in Los Angeles County  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Gateway Cities Council of Governments  
Each Member of the Los Angeles County Integrated Waste Management Task Force