



GAIL FARBER
CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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December 21, 2009

Ms. Gail Farber
Director
County of Los Angeles
Department of Public Works
P.O. Box 1460
Alhambra, CA 91802-1460

Mr. Stephen R. Maguin
Chief Engineer and General Manager
County Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, CA 90601-1400

Dear Ms. Farber and Mr. Maguin:

**PROGRESS REPORT ON THE DEVELOPMENT OF A WASTE-BY-RAIL SYSTEM –
COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the County Sanitation Districts of Los Angeles County's (Districts) Progress Report on the Development of a Waste-By-Rail System (Report), dated November 2009. The Report concludes that the Districts, for the reasons stated in the Report, will not be able to have a waste-by-rail system fully operational by the deadline of December 31, 2009, which was established by the County of Los Angeles Conditional Use Permit (CUP) No. 02-027-(4) granted by the Los Angeles County Regional Planning Commission on December 18, 2002.

On December 17, 2009, at a publicly noticed meeting, the Task Force formally considered the Report. The following is offered:

1. **General**

For many years, jurisdictions in Los Angeles County have relied on Puente Hills Landfill's (PHL) 13,200 tons per day of permitted disposal capacity and additional 33,000 tons per week of beneficial use material capacity to meet their solid waste management needs. This matter was extensively considered by the County in granting a 10-year extension of the PHL's Conditional Use Permit, which would allow time for the Districts to develop a waste-by-rail system to meet the needs of cities and the County after the closure of PHL. As such, the County issued CUP incorporated conditions requiring the Districts to conduct a number of related tasks, including those listed in Conditions 24.c and 58.

Condition 58 stipulates that "commencing January 1, 2010, and effective January 1 of each year thereafter through the life of this grant, the average daily tonnage of waste disposed of at the landfill shall be reduced by 2,000 tons per day if the permittee's waste-by-rail system (including materials recovery and rail-loading facilities, rail access, and out-of-County/remote landfill components) is not fully operational by December 31 of the preceding year." This Condition further stipulates, in part, that (a) "no reduction in daily tonnage will be required if the Director of Public Works finds that, based upon documentation provided by the permittee in the quarterly reports, as well as, accompanying economic analyses, the permittee is making best faith efforts to comply with the specified deadlines, and any lack of compliance is through no fault of the permittee", and (b) "the Director of Public Works shall have the discretion to find that a reduction in daily tonnage is not required because other new processes or solid waste management capacity as an alternative to urban landfills, that has been made available either by the permittee or others, could more cost effectively serve the jurisdictions of Los Angeles County than waste-by-rail."

2. **The Task Force Recommendations**

The Task Force recognizes and appreciates the sheer size and complexity of the waste-by-rail project and the progress made so far by the Districts. Also, in consideration of the need to (a) proceed with completion of the waste-by-rail system in an expeditious manner, (b) provide the necessary resources to fund continued development of the system, and (c) maximize available disposal capacity at the PHL for use by local jurisdictions, the Task Force voted to recommend that the County Department of Public Works (Public Works) grant the Districts a waiver from the disposal reduction of 2,000 tons per day which is scheduled to take effect on January 1, 2010, subject to the following conditions:

- The Districts will assist Public Works and the Task Force in proactively lobbying the Legislature, local elected officials, and other stakeholders to revise/remove State legislative and regulatory obstacles to the development of conversion technologies, and outreach to cities and residents in Los Angeles County about these technologies.
- In concert with Public Works and the Task Force, the Districts will work with jurisdictions in developing additional solid waste management alternatives to manage the beneficial use materials currently going to the PHL and work with Districts' member jurisdictions in their efforts to address their solid waste management needs which are currently being accommodated through the PHL.
- The Districts' outreach efforts will be expanded to include, but not be limited to, facilitating presentations by Public Works staff to the Districts' Board of Directors as deemed appropriate by Public Works.

Granting Task Force's recommended waiver and associated conditions, which received unanimous support of those members of the Task Force representing the League of California Cities, Los Angeles County Division, will ensure an expedited development of the waste-by-rail system and other alternatives with sufficient capacity to replace the PHL and allow for a smooth transition to the new system.

3. Technical Comments On The Report

A. Section 2.3 – Milestone NO. 3 – Status of Development (page 4)

- This section should be updated to provide the current status of activities that occurred during 2009, including completion of the demolition of existing buildings at the site of the Puente Hills Intermodal Facility; commencement of the construction of Workman Mill Road and Access Road Improvements; and awarding of a contract to construct the Mesquite Rail Spur and Intermodal Facility project.

B. Section 6.1 – Current Disposal and Market Conditions (page 15)

- The historical summary of disposal tonnages by Los Angeles County jurisdictions provided on Table 4 should be revised to be consistent with data from the County's Solid Waste Information Management System (enclosed), which contains current disposal information pursuant to State law and regulations.

C. Section 6.2 – Project Disposal Need (page 15)

- It is recommended that the disposal analyses presented in Tables 5 and 6 be revised utilizing the disposal need projections contained in the 2008 Annual Report of the Los Angeles County Countywide Integrated Waste Management Plan that was submitted to the California Integrated Waste Management Board on October 22, 2009, pursuant to State law (PRC section 41821.1). The Annual Report may be downloaded at dpw.lacounty.gov/swims/Upload/2008%20AR%20FINAL.pdf.

The Task Force appreciates consideration of our recommendations and technical comments and looks forward to future updates on the progress of the Districts' waste-by-rail efforts. Should there be 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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Enc.

cc: Each Member of the Los Angeles County Board of Supervisors
Each City Mayor in Los Angeles County
South Bay Cities Council of Governments
San Gabriel Valley Council of Governments
Gateway Cities Council of Governments
Each Member of the Los Angeles County Integrated Waste Management Task Force



Historical Disposal Tonnages for All In-County Jurisdictions (Including Exports)

Reporting Period: From 2005 To 2008

Jurisdiction	2005	2006	2007	2008	Total
AGOURA HILLS	32,323.11	27,195.17	29,331.55	24,112.72	112,962.55
ALHAMBRA	71,655.74	57,524.93	53,778.88	51,877.87	234,837.42
ARCADIA	98,493.30	75,363.35	71,408.13	58,245.73	303,510.51
ARTESIA	33,333.45	18,588.30	15,772.51	15,926.05	83,620.31
AVALON	3,173.24	2,852.22	3,436.60	3,208.35	12,670.41
AZUSA	100,490.84	54,541.47	56,234.65	51,391.55	262,658.50
BALDWIN PARK	100,563.53	67,988.07	63,059.12	61,541.59	293,152.31
BELL	33,650.16	31,460.01	33,676.10	28,143.40	126,929.67
BELL GARDENS	49,311.72	44,191.36	44,446.09	35,652.90	173,602.07
BELLFLOWER	76,727.23	70,522.21	56,357.17	50,085.83	253,692.44
BEVERLY HILLS	78,344.94	60,199.14	56,923.98	60,179.51	255,647.57
BRADBURY	3,469.77	4,533.55	3,732.68	3,867.17	15,603.17
BURBANK	121,904.49	113,119.59	113,902.65	110,443.17	459,369.90
CALABASAS	92,481.81	84,841.88	70,542.91	64,234.50	312,101.10
CARSON	229,838.61	215,205.05	228,527.22	263,597.66	937,168.53
CERRITOS	84,181.66	73,636.04	73,914.35	59,482.90	291,214.95
CLAREMONT	38,119.77	32,299.77	28,279.91	29,679.69	128,379.14
COMMERCE	179,233.60	152,630.67	154,997.00	136,651.09	623,512.36
COMPTON	131,687.11	127,481.55	127,283.49	119,056.62	505,508.77
COVINA	73,128.75	54,061.79	57,031.32	47,484.33	231,706.19
CUDAHY	18,805.82	19,518.89	19,220.56	18,532.63	76,077.90
CULVER CITY	78,568.01	64,244.84	64,028.31	64,524.73	271,365.89
DIAMOND BAR	51,886.76	43,081.00	38,874.61	36,567.83	170,410.19
DOWNEY	161,970.86	139,506.02	131,907.59	116,397.16	549,781.63
DUARTE	34,559.60	24,668.40	24,829.80	22,317.28	106,375.08
EL MONTE	163,324.13	134,186.31	136,630.87	115,931.22	550,072.53
EL SEGUNDO	80,960.71	51,750.29	53,246.31	53,392.31	239,349.61
GARDENA	156,855.80	114,467.19	105,495.19	186,803.44	563,621.62
GLENDALE	252,371.25	215,795.87	203,858.88	188,721.28	860,747.28



Historical Disposal Tonnages for All In-County Jurisdictions (Including Exports)

Reporting Period: From 2005 To 2008

	2005	2006	2007	2008	Total
GLENDORA	70,897.00	53,933.63	53,193.52	45,028.66	223,052.81
HAWAIIAN GARDENS	15,851.28	15,444.75	11,904.63	7,468.38	50,669.04
HAWTHORNE	93,268.31	104,058.79	81,549.66	69,354.04	348,230.80
HERMOSA BEACH	25,950.70	25,072.24	20,232.17	18,503.62	89,758.73
HIDDEN HILLS	8,549.39	5,931.08	6,152.97	4,081.33	24,714.77
HUNTINGTON PARK	147,476.99	61,640.57	55,081.39	53,940.15	318,139.10
INDUSTRY	172,288.22	134,192.63	133,174.50	121,517.49	561,172.83
INGLEWOOD	114,254.15	105,994.11	102,128.10	95,672.59	418,048.95
IRWINDALE	102,802.99	41,343.76	43,543.42	45,267.07	232,957.24
LA CANADA FLINTRIDGE	59,912.80	29,954.77	25,673.62	23,706.77	139,247.96
LA HABRA HEIGHTS	8,734.88	7,783.08	8,009.55	6,316.27	30,843.78
LA MIRADA	57,959.13	48,861.97	45,813.33	41,204.06	193,838.49
LA PUENTE	81,843.40	61,156.97	62,544.23	61,888.13	267,432.73
LA VERNE	61,480.17	37,064.05	35,670.89	31,536.94	165,752.05
LAKEWOOD	91,573.61	83,885.07	73,970.93	68,125.62	317,555.23
LANCASTER	159,286.95	164,418.16	144,416.05	123,051.60	591,172.76
LAWNDALE	24,048.72	29,078.00	28,025.50	26,459.24	107,611.46
LOMITA	18,703.79	22,129.81	21,233.54	19,847.84	81,914.98
LONG BEACH	664,240.47	599,557.95	585,424.67	512,345.67	2,361,568.75
LOS ANGELES	4,633,250.50	3,685,508.78	3,676,447.34	3,323,505.89	15,318,712.49
LOS ANGELES COUNTY	1,459,122.28	1,362,249.98	1,144,766.63	1,019,937.58	4,986,076.47
LYNWOOD	73,817.36	65,224.03	65,080.19	50,579.67	254,701.25
MALIBU	53,032.51	50,903.05	50,953.06	40,889.07	195,777.69
MANHATTAN BEACH	46,371.23	53,640.85	50,419.52	41,684.05	192,115.65
MAYWOOD	21,452.48	20,141.26	19,803.24	19,232.42	80,629.41
MONROVIA	64,484.19	47,631.49	45,043.70	44,257.50	201,416.88
MONTEBELLO	116,088.29	84,775.69	89,137.81	82,979.93	372,981.72
MONTEREY PARK	57,940.88	53,296.87	55,307.10	51,808.15	218,353.00
NORWALK	105,978.95	89,201.34	81,995.17	67,642.02	344,815.48
PALMDALE	152,387.18	149,114.17	127,413.61	114,103.08	543,018.03



Historical Disposal Tonnages for All In-County Jurisdictions (Including Exports)

Reporting Period: From 2005 To 2008

	2005	2006	2007	2008	Total
PALOS VERDES ESTATES	16,916.34	17,852.98	20,086.73	15,022.84	69,878.89
PARAMOUNT	90,497.01	77,380.76	61,630.95	51,897.10	281,405.82
PASADENA	367,182.77	276,756.24	246,080.65	200,777.42	1,090,797.08
PICO RIVERA	97,589.87	86,604.58	80,441.80	73,847.74	338,483.99
POMONA	225,720.38	194,888.11	170,286.63	170,062.88	760,958.00
RANCHO PALOS VERDES	42,000.22	36,126.18	34,814.59	30,875.09	143,816.08
REDONDO BEACH	73,501.32	71,666.04	63,843.53	56,103.95	265,114.84
ROLLING HILLS	7,254.57	7,009.51	6,894.05	6,115.93	27,274.06
ROLLING HILLS ESTATES	11,591.79	12,040.76	14,950.37	12,358.45	50,941.37
ROSEMEAD	69,650.87	57,704.42	57,453.66	53,575.53	238,384.48
SAN DIMAS	53,243.40	42,775.57	44,553.60	37,860.12	178,432.69
SAN FERNANDO	29,505.83	21,059.08	23,123.30	21,292.16	94,980.37
SAN GABRIEL	52,715.57	44,293.41	43,317.52	38,183.45	178,509.95
SAN MARINO	28,891.47	19,659.66	15,804.46	13,003.42	77,359.01
SANTA CLARITA	188,580.87	172,098.33	163,431.47	145,543.19	669,653.86
SANTA FE SPRINGS	160,229.34	168,762.45	137,912.76	150,290.47	617,195.02
SANTA MONICA	178,409.96	127,702.84	122,770.40	123,709.17	552,592.37
SIERRA MADRE	18,407.92	12,061.11	11,259.52	9,091.20	50,819.75
SIGNAL HILL	26,762.58	18,776.46	23,496.40	14,161.98	83,197.42
SOUTH EL MONTE	43,331.98	42,932.95	47,167.99	36,602.16	170,035.08
SOUTH GATE	200,231.37	194,207.61	189,818.15	176,544.62	760,801.75
SOUTH PASADENA	33,416.54	23,348.60	21,954.79	18,180.13	96,900.06
TEMPLE CITY	40,405.89	29,764.27	31,700.09	27,896.82	129,767.07
TORRANCE	263,050.28	209,545.52	206,481.50	180,225.94	859,303.24
VERNON	269,114.54	222,821.86	239,967.24	206,187.91	938,091.54
WALNUT	32,031.22	25,011.51	29,018.77	25,376.80	111,438.30
WEST COVINA	115,699.95	91,843.93	91,695.11	74,695.22	373,934.21
WEST HOLLYWOOD	48,812.02	51,926.47	38,498.90	35,585.25	172,822.64
WESTLAKE VILLAGE	19,430.17	17,664.03	18,538.75	14,723.89	70,356.84
WHITTIER	190,281.31	162,387.31	157,842.00	135,068.32	645,578.94



Historical Disposal Tonnages for All In-County Jurisdictions (Including Exports)

Reporting Period: From 2005 To 2008

	2005	2006	2007	2008	Total
Total	14,386,919.88	12,005,316.35	11,479,674.10	10,464,844.47	48,336,754.80

Report last updated on November 10, 2009, up to 2nd Quarter 2009 data.

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