



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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STEPHEN R. MAGUIN
Chief Engineer and General Manager

January 12, 2009

File No. 31R-100.10

Dr. Ralph G. Appy
Director of Environmental Management
Los Angeles Harbor Department
425 South Palos Verdes Street
San Pedro, California 90731

Dear Dr. Appy:

**Comments on the Draft Environmental Impact Report (EIR)
for the Wilmington Waterfront Development Project (SCH# 2008031065)**

The County Sanitation Districts of Los Angeles County (Districts) received the above-referenced documents for the proposed project on December 15, 2008. Regarding solid waste management for the above-mentioned project, the Districts offer the following updated comments:

1. There are seven major landfills currently operating within Los Angeles County. These landfills serve large geographic areas that are not necessarily limited to those areas in the immediate vicinity of these sites. There is insufficient permitted disposal capacity within the existing system serving Los Angeles County to provide for its long-term disposal needs. However, there is additional capacity potentially available within Los Angeles County through the expansion of local landfills, and outside of Los Angeles County through the use of waste-by-rail at the proposed Eagle Mountain Landfill in Riverside County and the Mesquite Regional Landfill in Imperial County. Consequently, while this additional capacity will be needed, all the necessary permits and approvals have not yet been issued to access and/or use these facilities.

The Districts entered into a Purchase and Sale Agreements in August 2000 on the only two fully permitted rail haul landfills in California: the Mesquite Regional Landfill in Imperial County and the Eagle Mountain Landfill in Riverside County. The Districts closed escrow on the Mesquite Regional Landfill in December 2002. Due in part to pending federal litigation, the Districts have not closed escrow on the purchase of the Eagle Mountain Landfill.

In the Mesquite Regional Landfill Waste-by-Rail system, the municipal solid waste will be transported approximately 210 miles to the site via the Union Pacific Railroad main line, which extends from Metropolitan Los Angeles to Glamis and then by a proposed 4.5-mile rail spur built to the site. Construction of the infrastructure necessary to make MRL operational was completed at the end of 2008. Construction of the rail facilities will begin in 2009 and will complete in 2011/2012.

The City of Industry Planning Commission has issued a CUP for the Puente Hills Intermodal Facility (PHIMF) in June 2008. The PHIMF, which will be used for loading and unloading rail-ready shipping containers for the Waste-by-Rail system, is being constructed adjacent to the PHMRF. At full operation the PHIMF will manage up to 8,000 tons (2 trains) per day of municipal solid waste. Additional intermodal facilities may become part of the Waste-by-Rail system as disposal capacity needs for Los Angeles County increase. The Waste-by-Rail system is expected to be operational by 2011/2012.

2. On page 3.12-8, please replace the sentence on lines 19 and 20 to read: "Additionally, the County Sanitation Districts of Los Angeles County (Sanitation Districts) is developing a waste-by-rail system. An EIR for the Puente Hills Intermodal Facility was approved June 2008."
3. On page 3.12-8, please replace "Los Angeles County Ordinance 7A" - on line 26 - with: "Sanitation Districts Ordinance No. 4."
4. On page 3.12-8, please remove Calabasas Landfill from the list of potential secondary landfills available for use by the proposed project (Table 3.12-3). The Calabasas Landfill is a restricted-wasteshed facility operated by the Districts, and is, hence, not available for the disposal of solid waste generated by the project.

If you have additional questions concerning this response, please contact me at telephone (562) 908-4288, extension 2764.

Very truly yours,

Stephen R. Maguin



Ziad A. El Jack
Senior Engineer
Planning Section

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