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September 26, 2006

Bobbie Garcia
California Integrated Waste Management Board
Permitting and Enforcement Division
P.O. Box 4025 MS-16
Sacramento, CA 95812-4025

Subject: Comments on Proposed Revisions to Solid Waste Permitting Regulations (aka: AB 1497 Regulations)

Dear Ms. Garcia:

On behalf of its 22 member counties, the Rural Counties Environmental Services Joint Powers Authority (ESJPA) appreciates this opportunity to provide the opportunity to provide comments on the permit implementation regulations (AB 1497).

The ESJPA has been an active participant throughout the lengthy process and we are satisfied with the decision to proceed with the minor change and the significant change lists. We also support the staff recommendation to limit the relationship between the solid waste facility permit and the conditional use permit (CUP).

Regardless of any terms and conditions imposed in the solid waste facility permit, the requirements imposed by the CUP are still binding and local agencies are charged with enforcement of those provisions.

The most important concept of any potential permit change is constant communication between the operator and the Local Enforcement Agency (LEA).

Thank you leading a very thorough participatory process.

Please contact us if you have any questions. Thank you again for this opportunity to provide comments on this proposal.

Sincerely,

Larry Sweetser
ESJPA Consultant

cc: ESJPA Board of Directors