



LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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DEAN D. EFSTATHIOU
CHAIRMAN

August 21, 2008

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

Dear Ms. Brown:

POLICY OPTIONS TO REDUCE GREEN MATERIAL ALTERNATIVE DAILY COVER

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), I respectfully request the California Integrated Waste Management Board (Waste Board) to work with local governments in formulating State policy to reduce green waste alternative daily cover (ADC) since such policies will significantly impact their ability to comply with the State's 50 percent waste reduction mandate and result in other unintended environmental consequences. These options (Item 10 of the June 17, 2008, Waste Board Agenda), were considered by the Waste Board's Strategic Policy Development Committee at its June 10, 2008, meeting. These options included phasing out green waste ADC diversion credit, applying disposal and tipping fees on ADC, using generated revenues from these fees to promote development of composting facilities, as well as possible mandates on local jurisdictions to develop and adopt a 15-year composting capacity element similar to the existing Assembly Bill 939 mandated Siting Element. Unfortunately, these options were developed with virtually no input from cities and counties.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 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 with a combined population in excess of ten million. Consistent with these responsibilities, and to ensure a coordinated and cost-effective and environmentally-sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a County-wide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, the County of Los Angeles Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

The use of greenwaste as ADC has numerous environmental and economic benefits, including: preventing the mining and wasting of clean soil that would have otherwise been used as daily cover; conserving landfill capacity, by avoiding an additional cover material layer and the ability of green waste to compact and decompose over time; creating markets for the beneficial use of green waste; maintaining a local outlet for the beneficial use of greenwaste; and, strengthening the curbside collection infrastructure for greenwaste. These benefits are especially important in Southern California since there is inadequate processing capacity for green waste and a limited market for compost made from greenwaste due to difficulties encountered in permitting/developing these types of facilities. This is particularly acute in urban areas due to lack of suitable land, stringent air quality regulations, and community reluctance towards the proximity of such facilities. Even if such facilities were developed elsewhere, greenwaste would still need to be transported over long distances, leading to higher trash rates and added traffic congestion and air pollution.

Because of these significant benefits, in 1996 the Legislature passed Assembly Bill 1647 (Bustamante) to provide unrestricted diversion credit to green waste used as ADC, making a distinction from greenwaste disposed in the landfill. Due to this diversion credit, and because of the benefits listed above, jurisdictions and private industry invested millions of dollars in expensive equipment and infrastructure to implement greenwaste collection and recycling programs which provide for the separate collection of green waste to be used as ADC. Jurisdictions in Southern California and other parts of the state now rely on this infrastructure to manage green waste to maintain compliance with the State's 50 percent waste reduction mandate.

It is for the above reasons that the Task Force requests the Waste Board to work closely with cities, counties and other impacted communities in formulating State policy to reduce green waste ADC, especially those that will be significantly impacted by such policies. Further, while we are supportive of composting, shifting green waste away from ADC towards composting facilities will also result in increased trash rates, air pollution, and traffic congestion in Southern California. The Task Force also has strong reservations regarding the proposal to eliminate ADC diversion credit and thus mandating additional diversion mandates on local jurisdictions without considering the critical resources necessary to successfully meet them. Therefore, we respectfully request the Waste Board redirect its efforts to place a greater emphasis on diverting green materials currently being disposed rather than consuming resources on investigating ways to decrease the beneficial use of green waste as ADC as legitimized by Assembly Bill 1647.

While we share your desire to explore viable green waste management enhancement opportunities we must also consider the feasibility of such options and their relative impact on the operational and economic structures currently in place. Accordingly, it is requested that your Board include this Task Force in further stakeholder discussions to

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a much greater contributive extent in order to develop a more comprehensive set of alternative green waste management options.

We would appreciate your written response which would be of great interest to jurisdictions in Los Angeles County as well as those throughout the State. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Sincerely,

Margaret Clark

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

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cc: Governor Arnold Schwarzenegger
Cal EPA Secretary, Linda Adams
Each Member of the California Integrated Waste Management Board
California Integrated Waste Management Board (Mark Leary, Ted Rauh,
Bobbie Garcia)
California State Association of Counties
The League of California Cities
The League of California Cities, Los Angeles County Division
Each Member of the County of Los Angeles' Board of Supervisors
Each City Mayor in Los Angeles County
South Bay Cities Counsel of Governments
San Gabriel Valley Counsel of Governments
Gateway Cities Counsel of Governments
Southern California Association of Governments
Each City Recycling Coordinator in Los Angeles County
Each Member of the Los Angeles County Integrated Waste Management Task Force