



LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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April 28, 2010

The Honorable Lori Saldaña
State Capitol, Room 3152
Sacramento, CA 94249-0076

Dear Assembly Member Saldaña:

**ASSEMBLY BILL 1793 (INTRODUCED FEBRUARY 10, 2010)
COMMON INTEREST DEVELOPMENTS: ARTIFICIAL TURF**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **supports if amended** Assembly Bill 1793 (AB 1793). If enacted, AB 1793 would amend the Davis-Stirling Common Interest Development Act to make void the governing documents of a common interest development that prohibits, or includes conditions that have the effect of prohibiting, the use of synthetic surface that resembles grass. The Task Force recommends that the proposed legislation be amended (a) to address the management of the product after its useful life, (b) establish a minimum permeability for the product to ensure surface and rain water percolation over the life of the product, (c) establish a minimum recycled content for the product, and (d) require that the product would prevent the formation of mold beneath the product, in order to protect the public's health and safety while ensuring the longevity of the product.

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 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 Davis-Stirling Common Interest Development Act provides for the creation and regulation of common interest developments (i.e. condominiums, timeshares, planned unit developments, etc.) and currently prohibits common interest developments from prohibiting the use of low water-using plants. AB 1793, if enacted, would further prohibit a common interest development from prohibiting the use of artificial turf or any other synthetic surface that resembles grass.

The Task Force acknowledges your efforts in helping to preserve our natural resources by allowing the use of artificial turf that does not require the use of water. At the same time, the Task Force believes the public's health and safety would be additionally served if the bill were amended to include the following provisions in the bill:

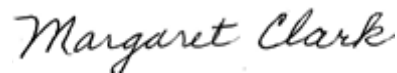
- manufacturer of the product complies with a producer responsibility plan, as specified by CalRecycle, to take back the product at the end of its useful life
- product is permeable to allow water to percolate and prevent runoff, thus allowing local governments to continue to meet stormwater runoff requirements (this initiative could be lead by the State Department of Water Resources, in concert with affected stakeholders)
- product contains minimum amount recycled content, which may have the added benefits of freeing up landfill space and helping the State reduce its dependence on fossil fuel related products.
- require that the product would prevent the formation of mold beneath the product, in order to protect the public's health and safety while ensuring the longevity of the product

If the above provisions were to be included in AB 1793, manufacturers would be encouraged to redesign their products to minimize waste by holding them responsible for the collection and proper management of their products at the end of their service life. Additionally, the burden on local governments to manage the product at the end of its useful life would subsequently be removed.

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Therefore, the Task Force **supports AB 1793, if amended**, to incorporate the recommendations above. 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

PGT/RG:kp
P:\SEC\AB 1793

cc: Senate President Pro Tem Darrell Steinberg
Assembly Speaker John A. Perez
Senator Dennis Hollingsworth, Minority Leader
Assembly Member Martin Garrick, Minority Leader
Each Member of the Senate Rules Committee
Margo Reid Brown, Acting Director, CalRecycle
Mark Cowin, Director, California Department of Water Resources
Each Member of the Los Angeles County Legislative Delegation
Each Member of the County of Los Angeles Board of Supervisors
Each City Mayor in the County of Los Angeles
California State Association of Counties
League of California Cities
League of California Cities, Los Angeles County Division
California Product Stewardship Council
Southern California Association of Governments
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Gateway Cities Council of Governments
Each City Recycling Coordinator in Los Angeles County
Each Member of the Los Angeles County Integrated Waste Management Task Force