



MARK PESTRELLA, CHAIR
MARGARET CLARK, VICE - CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org

January 9, 2019

Mr. Marcus Santillano
California Department of Resources Recycling and Recovery
1001 I Street
Sacramento CA 95812-4025

Dear Mr. Santillano:

NOTICE OF PREPARATION (NOP) OF ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE ADOPTION OF REGULATIONS TO IMPLEMENT SENATE BILL 1383 – SHORT-LIVED CLIMATE POLLUTANTS (SLCP) ORGANIC WASTE METHANE EMISSION REDUCTION REQUIREMENTS (SCH #2018122023)

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to thank the California Department of Resources Recycling and Recovery (CalRecycle) for providing the opportunity to comment on the “Notice of Preparation of Environmental Impact Report for The Adoption of Regulations to Implement Senate Bill 1383 (SB 1383) – Short-Lived Climate Pollutants (SLCP) Organic Waste Methane Emission Reduction Requirements (SCH #2018122023).”

<https://www2.calrecycle.ca.gov/PublicNotices/Details/3568>

One of the Task Force priorities in addressing solid waste management issues is to ensure public health and safety as well as the protection of our natural resources. As such, the Task Force has been in support of efforts addressing the impacts of greenhouse gas (GHG) emissions and climate change. To this end, the Task Force is providing the following on the subject EIR pursuant to its NOP dated December 11, 2018:

1. In Appendix C – Project Issues Discussed in Document, the factors discussed should be expanded to also include the following:
 - Agricultural/Land – It is expected that significant amounts of chip and grind materials, mulch, and compost will be used by businesses engaged in agricultural activities. Therefore, the impacts to agriculture and land need to be identified and analyzed in the EIR.
 - The analysis should consider the impacts of the potential importation and exportation of contaminated organic waste from quarantined areas of state to non-quarantined areas. Furthermore, a significant amount of organic waste will be composted and used by farmers. Pathogens and microorganisms may be present in compost that is not processed appropriately. The EIR needs to identify the impacts of using compost containing pathogens and/or microorganisms as well as listing possible mitigation measures.

- The impact analysis also needs to include the potential impacts to traffic/circulation, air quality, GHGs, and energy from transporting organics from generally urbanized areas of the state where organic waste is generated to rural areas where recovered organic products are used for agriculture and land application.
 - Fiscal – It is estimated that achieving SB 1383 (Chapter 395 of the 2016 State Statutes) mandates would require a capital investment of over \$3 billion with a substantial financial impact on California’s jurisdictions. This impact cannot not be disregarded and must be identified in the EIR together with potential mitigation measures. Furthermore, the EIR must consider the availability of markets to handle recovered organic products and mitigation measures to address potential impacts from policies such as the “China National Sword.”
 - Population – Existing state law and regulations restrict any increase in the amount of solid waste **generation** by cities and counties beyond the **2006 average tonnages** (emphasis added). However, the population and economy of California continues to grow, along with solid waste generation and disposal, impacting the state’s ability to achieve the mandated goals of SB 1383. This item needs to be discussed by the EIR together with impacts and potential mitigation measures.
2. The Scope & Content (Introduction, Background, Project Description, Environmental Effects) section of the subject NOP and EIR needs to be expanded to address all probable effects of the project, including, but not limited to, the following:
- Identify all potential options for organic waste collection, processing, recycling, and disposal technologies, along with their potential beneficial and adverse impacts on human and natural resources as well as the necessary mitigation measures to achieve the SB 1383 mandates.
 - As substantiated by the regulated communities and CalRecycle, there is a significant shortage of infrastructure capacity to collect, store, process, and manage the amount of organic waste required to achieve the SB 1383 targets. The EIR must identify where organic waste will go and how far it will have to be transported. The analysis must provide a comprehensive transportation impact analysis and potential mitigation measures.
 - Composting – The EIR needs to address the potential for the generation and emission of methane from incomplete composting (aerobic) activities and chip and grind operations. Although the methane generated from these processes is from biogenic sources, the effects must be considered because there is no difference between methane generated in a landfill, which is also biogenic, and methane generated from a compost or mulch pile.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [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

Mr. Marcus Santillano
January 9, 2019
Page 3 of 3

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, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

Should you have any questions regarding these comments, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



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

KV:cso

P:\epub\Budget\TASK FORCE\Task Force\Letters\2019\January\EIR NOP 01.09.19.docx

cc: CalRecycle (Howard Levenson, Mark de Bie, Cara Morgan, Hank Brady, Georgianne Turner, Christopher Bria, Marshall Graham)
California Air Resources Board (Mary Nichols, David Mallory)
California Department of Food and Agriculture (Secretary Karen Ross)
California Department of Public Health (Director Karen Smith)
League of California Cities
League of California Cities, Los Angeles County Division
California State Association of Counties
Each Member of the Los Angeles County Board of Supervisors
Sachi A. Hamai, Los Angeles County Chief Executive Officer
Each City Mayor/Manager in the County of Los Angeles
South Coast Air Quality Management District
South Bay Cities Council of Governments
San Gabriel Valley Council of Governments
Gateway Cities Counsel of Governments
Southern California Association of Governments (Frank Wen)
Each City Recycling Coordinator in Los Angeles County
Each Member of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force
Each Member of the Task Force Alternative Technology Advisory Subcommittee
Each Member of the Task Force Facility Plan Review Subcommittee