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December 4, 2014

Ms. Caroll Mortensen, Director
California Department of Resources Recycling and Recovery
1001 I Street
Sacramento, California 95812

Dear Ms. Mortensen:

**OCTOBER 21, 2014, DRAFT FIVE-YEAR PLAN
WASTE TIRE RECYCLING MANAGEMENT PROGRAM
LOCAL GOVERNMENT WASTE TIRE CLEANUP AND AMNESTY GRANT**

On behalf of the Los Angeles County Integrated Waste Management Task Force (Task Force) I would like to express our appreciation for the opportunity to offer comments on the proposed draft Five-Year Plan for the Waste Tire Recycling Management Program, dated October 21, 2014 (<http://www.calrecycle.ca.gov/Tires/Events/>). The Task Force is extremely concerned with the proposal to eliminate one of the most successful elements of the Program by phasing out the Waste Tire Cleanup and Amnesty Grants for local jurisdictions beginning Fiscal Years 2015-16 and 2016-17, respectively.

The existing Waste Tire Cleanup and Amnesty Grants have enabled local jurisdictions to remove hundreds of thousands of waste tires from circulation. Removing waste tires protects public health and safety by eliminating breeding grounds for mosquitoes and other vectors that spread disease. Illegally dumped tires also pose a significant fire danger especially given existing drought conditions. Tires caught in brush fires release toxic smoke and leachates that pollute the air, water courses, and sensitive wildlife areas.

Los Angeles County generates approximately one third of all the waste tires in the State. The State tire grants have allowed local jurisdictions like Los Angeles County to ensure that their tires collected from cleanups and amnesty events are recycled. The tires are diverted from landfills and recycled into rubberized asphalt concrete, civil engineering applications, and other products. This helps to stimulate the tire recycling industry. In 2013 alone Los Angeles County collected over 700,000 lbs. of tires for recycling.

The draft Five-Year Plan proposes to shift the grants from local jurisdictions to Local Conservation Corps, most of whom do not have the experience or resources of local governments for operating these programs. In urban areas, local jurisdictions have a number of advantages over conservation corps: they are on the streets every day for maintenance activities and can pick up tires immediately; they are familiar with the intricacies of the streets and alleys where many tires are dumped; local agencies can utilize existing relationships with franchise haulers and communities to advertise and promote collection events; and many local agencies have their own facilities, which can be used to host collection events. These factors all contribute to lower overall costs for local jurisdictions to recycle waste tires.

Therefore, the Task Force opposes the elimination of the Local Government Waste Tire Cleanup and Amnesty Grants. Rather than eliminate local government involvement completely, the Local Conservation Corps should be encouraged to compete with local jurisdictions for grant funding. Part of the scoring criteria for the Cleanup Grant is cost per tire, thus rewarding participants who are most efficient at collecting and recycling the waste tires. Instead of phasing out the said grants, we would recommend:

- Allowing Local Conservation Corps, in addition to local governments, be eligible as applicants
- Requiring at least 75% of the tires collected to be recycled (some old tires are not recoverable)

These recommendations would lead to potential savings in the Tire Fund as a result of increased competition and improved efficiencies. Diverting waste/used tires from landfills into the recycling sector would improve the availability of raw materials and would lessen the need for public funding of the recycled rubber industry.

The Task Force also recommends that CalRecycle seriously consider the use of conversion technologies to assist in diversion of waste/used tires from being landfilled. As stated in the CalRecycle Report to the Legislature on the Five-Year Plan, dated July 1, 2013, *"The overall waste tire diversion rate increased significantly from 81 percent in 2010 to 88 percent in 2011. This increase was largely a result of the continued, unprecedented rapid growth in the export of waste tires to Pacific Rim nations, largely for use as tire-derived fuel (TDF), which is now the largest single end-use destination for California waste tires. If waste tire exports, TDF, and use as alternative daily cover are not included, then the diversion rate is only 44 percent. Moreover, 5 million tires were landfilled in 2011."*

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We are concerned that the proposed Five-Year Plan continues to perpetuate the “out-of-sight, out-of-mind” mindset that has contributed to extensive growth in the recyclables/waste tires export market. The Task Force’s concerns are further substantiated by CalRecycle as stated in the previous paragraph. As indicated, collected recyclable materials, such as tires, are in high demand by incineration facilities located in the Pacific Rim countries, which operate at considerably looser standards/regulations as compared to transformation and Engineered MSW facilities in California. This fact cannot be disregarded by CalRecycle and the California Air Resources Board since air currents over the Pacific create the real possibility that emissions from incineration facilities operating in the Pacific Rim countries will travel across the ocean and impact California’s air quality and possibly our citizens’ well-being. As such, the “...Market Development and New Technology Activities for Waste and Used Tires” Section of the Five-Year Plan should be expanded to provide for development of facilities utilizing appropriate conversion technologies to manage at least that portion of waste/used tires that are being shipped out of California.

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 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.

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We appreciate your consideration of our comments and look forward to developing a Five-Year Plan that serves the needs of local jurisdictions impacted by waste tires. If you have any questions, please contact Mr. Mike Mohajer 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
Mayor Pro Tem, City of Rosemead

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cc: Governor Edmund G. Brown
Governor's Office of Planning and Research (Ken Alex)
CalEPA (Matt Rodriguez)
CalRecycle (Howard Levenson)
California Air Resources Board (Mary Nichols)
Each Member of the Los Angeles County Board of Supervisors
Each City Mayor and City Manager in the County of Los Angeles
California State Association of Counties
League of California Cities
League of California Cities, Los Angeles County Division
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