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LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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June 13, 2018

The Honorable Bob Wieckowski, Chair  
Senate Committee on Environmental Quality  
State Capitol, Room 2205  
Sacramento, CA 95814

Dear Senator Wieckowski:

**SUPPORT ASSEMBLY BILL 3178 (RUBIO) INTEGRATED WASTE MANAGEMENT PLANS:  
SOURCE REDUCTION AND RECYCLING ELEMENT: DIVERSION REQUIREMENTS –  
AMENDED JUNE 11, 2018**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **supports** Assembly Bill 3178 (AB 3178), as amended June 11, 2018.

If enacted, AB 3178 would require the Department of Resources Recycling and Recovery (CalRecycle), when evaluating a jurisdiction's good faith effort to meet its diversion requirements, to consider whether China's National Sword import policy caused the absence or loss of market for recyclable materials, necessitating the disposal of those materials as a temporary measure to protect public health and safety. The bill would also require CalRecycle to consider the extent to which the lack of an available market for one or more types of recyclable materials, which may prevent a jurisdiction from fully implementing its diversion programs, was the result of circumstances beyond the reasonable control of the jurisdiction.

Markets for recyclables are essential for local jurisdictions and State agencies in order to meet California's 75 percent recycling goal by 2020. Also, according to CalRecycle, over 60 percent of exported recyclable materials were shipped to China in 2016 (approximately 6.4 million tons). However, China's National Sword import policy establishes a new recyclable materials maximum contamination level of 0.5 percent, which is practically impossible for the existing facilities to achieve.

Accordingly, the Task Force supports AB 3178 as it seeks to address the issue of reduction in recycling markets by providing flexibility to local jurisdictions to meet diversion goals. The Task Force strongly believes that (1) the development of much needed in-state infrastructure using various types of recycling technologies is essential to meet the State's recycling goal while achieving the State's greenhouse gas reduction mandates; and (2) considering per capita disposal rates when determining if a jurisdiction has made a good faith effort to meet the state-mandated recycling goals is an indispensable part of this bill.

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Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939), 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 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.

Based on the foregoing, the Task Force **supports** AB 3178. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at [MikeMohajer@yahoo.com](mailto: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

BC:cso

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cc: Assembly Member Blanca Rubio  
Each Member and Staff of the Senate Committee on Environmental Quality  
California State Association of Counties  
League of California Cities – Los Angeles County Division  
Each member of the Los Angeles County Board of Supervisors  
Sachi A. Hamai, Los Angeles County Chief Executive Officer  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Gateway Cities Council of Governments  
Westside Cities Council of Governments  
Each City Mayor and City Manager in the County of Los Angeles  
Each City Recycling Coordinator in Los Angeles County  
Each Member of the Los Angeles County Solid Waste Management  
Committee/Integrated Waste Management Task Force