



GAIL FARBER
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

December 30, 2009

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

Dear Ms. Brown:

**COMMENTS REGARDING DECEMBER 15, 2009 BOARD AGENDA ITEM 4:
STATUS REPORT ON ORGANICS POLICY ROADMAP II AND PRESENTATION OF
ORGANICS POLICY ROADMAP III**

On behalf of the Los Angeles County Integrated Waste Management Task Force (Task Force), I would like to submit comments to the California Integrated Waste Management Board (Board) regarding the Organics Policy Roadmap (Organics Roadmap). At the Board's December 15, 2009, meeting, the Board did not discuss this item because it was on the committee consent agenda. As such, the Board agreed to receive comments in writing from the Task Force at the request of Mr. Mike Mohajer.

The Organics Roadmap was developed primarily to address Strategic Directive 6.1, which focuses on the largest category of disposed materials and calls for a reduction of the amount of organics in the waste stream of 50 percent by 2020. We continue to have concerns that the Board did not define the terms "organic" and "compostable organic" materials (see enclosed letter, dated November 23, 2009).

In addition, the Organics Roadmap continues to disregard key options to organics management, such as conversion technologies. As you may know, conversion technologies are advanced processes capable of converting post-recycled residual solid waste into useful products, green fuels, and clean, renewable energy. Conversion Technology facilities have been successfully operating in Europe, Japan and other countries for many years, and the County of Los Angeles has been working with the Task Force to develop demonstration conversion technology projects in Southern California. Despite the availability of performance data, which the County of Los Angeles and the Task Force have been compiling for years, these technologies have not been thoroughly evaluated by the Board, and have been excluded from consideration within the Organics Roadmap despite the potential to fully address Strategic Directive 6.1. This omission suggests a decision not to consider all viable waste management options, but rather a few preselected options.

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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 10 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, 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.

Given the substantial potential impact of this issue on cities and counties throughout the State, as well as, the various constituents represented by the Task Force, who include experts in their respective fields, we again respectfully request you and/or the soon to be formed Department of Resource Recycling and Recovery address our comments. Should you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147. We look forward to your action on this item.

Sincerely,



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

TM:cs

Enc.

cc: Governor Arnold Schwarzenegger
Each Member of the California Integrated Waste Management Board
Mark Leary, Executive Director, California Integrated Waste Management Board
California State Association of Counties
The League of California Cities
Each Member of the County of Los Angeles Board of Supervisors
The League of California Cities, Los Angeles County Division
Each City Mayor in Los Angeles County
Southern California Association of Governments
South Bay Cities Council of Governments
San Gabriel Valley Council of Governments

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Gateway Cities Council of Governments
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Alternative Technology Advisory Subcommittee
Each Member of the Facility and Plan Review Subcommittee



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November 23, 2009

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

Dear Ms. Brown:

**COMMENTS REGARDING NOVEMBER 17, 2009,
CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD MEETING,
AGENDA ITEM 14 – DISCUSSION OF ANNUAL TARGETS AND KEY ACTIVITIES
FOR CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD
STRATEGIC DIRECTIVES**

On November 16, 2009, Mr. Mike Mohajer on behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), forwarded to the California Integrated Waste Management Board (CIWMB) the enclosed electronic communication regarding the staff progress report for the subject item relating to Strategic Directive 6.1 (Attachment 5 of the subject item).

Strategic Directive 6.1 instructs the State to reduce the amount of organics in the waste stream by 50 percent by 2020. As stated by the Task Force in its August 13, 2008, letter (copy enclosed) and the subsequent letters to the CIWMB, the terms “organic” and “compostable organic” have yet to be clearly defined within the body of Strategic Directive 6.1. It is important that these materials be clearly defined to avoid confusion among decision-makers, regulated communities, and local governments that ultimately bear the cost. In response to our letters, on August 28, 2008, the CIWMB stated that “the Board broadly interpreted the term ‘organics’ as all carbon-based materials (approximately 70 percent of the waste stream) and ‘compostable organics’ as a subset of the carbon-based organics amounting to roughly 25 percent of waste stream”. In our letter dated July 7, 2009, the Task Force requested the CIWMB revise the Strategic Directive 6.1 to incorporate the above definitions.

Unfortunately the Task Force has not received a response from the CIWMB, nor are the above definitions clarified in the staff progress report for the subject item. Again, the Task Force respectfully requests that Strategic Directive 6.1 be revised to include the definitions for the terms “organic” and “compostable organic” materials. Further, Strategic Directive 6.1 must be expanded to clarify if the 50 percent reduction in the amount of organics is applicable to “compostable organic” materials, including green waste materials presently being used as a landfill alternative daily cover, *or all “organic” materials that are currently being disposed in landfills (emphasis added)*. If the latter is true, cities and counties in California may be faced with achieving a mandatory diversion rate of approximately 85 percent without any *practical and realistic tools, financial resources, and needless to say markets for the major portion of the recovered materials in California (emphasis added)*.

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 10 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, 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.

Given the substantial potential impact of this issue on cities and counties throughout the State, as well as the various constituents represented by the Task Force, who include experts in their respective fields, we hope you will take this opportunity to review and address our comments.

Ms. Margo Brown
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Should you have any questions, please contact Mr. Mohajer of the Task Force at (909) 592-1147. We look forward to your action on this item.

Sincerely,

Margaret Clark

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

TM:lb

P:\Sec\Task Force\Letters\TF Letter_SD6 1 Organics

Encs.

cc: Governor Arnold Schwarzenegger
Each Member of the California Integrated Waste Management Board
Mark Leary, Executive Director, California Integrated Waste Management Board
California State Association of Counties
The League of California Cities
Each Member of the County of Los Angeles Board of Supervisors
The League of California Cities, Los Angeles County Division
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South Bay Cities Council of Governments
San Gabriel Valley Council of Governments
Gateway Cities Council of Governments
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Alternative Technology Advisory Subcommittee
Each Member of the Facility and Plan Review Subcommittee

From: Mike Mohajer [mikemohajer@yahoo.com]
Sent: Monday, November 16, 2009 9:48 PM
To: Margo Reid Brown ; Sheila Kuehl; John Laird ; Carole Migden ; Rosalie Mule
Cc: Mark Leary ; Howard Levenson
Subject: 11/17/2009 CIWMB Meeting, Agenda Item 14 - Discussion of Annual Targets & Key Activities for CIWMB Strategic Directives

Madam Chair and Members of the Board,

On behalf of the Los Angeles County Integrated Waste Management Task Force (Task Force), I want to thank the California Integrated Waste Management Board (CIWMB) for the opportunity to submit comments on the staff report for the subject item and specifically in re to Strategic Directive (SD) 6.1 (Attachment 5 of the subject item).

Strategic Directive 6.1 requires the State to reduce the amount of organics in the waste stream by 50 percent by 2020. As stated by the Task Force in its previous letters to the CIWMB, the terms “**organic**” and “**compostable organic**” materials need to be clearly defined to avoid confusion among the legislature and regulatory bodies, regulated communities, and local governments that ultimately have to bear the cost. In response, on August 28, 2008, the CIWMB advised that “the Board broadly interpreted ‘organics’ as all carbon-based materials” (approximately 70 percent of the waste stream) and “compostable organics as a subset” of the carbon-based organics amounting to roughly 25 percent of waste stream. Consequently, the Task Force via its letter of July 7, 2009, requested that the CIWMB revise the Strategic Directive 6.1 to incorporate the above definitions.

To date, the Task Force has not received any response from the CIWMB nor does the staff report for the subject item address the Task Force long-standing request. Again, the Task Force respectfully requests that that Strategic Directive 6.1 be revised to include the said definitions.

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 its 88 cities in Los Angeles County with a combined population in excess of 10 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, 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.

Thank you for your consideration. Should you have any questions, please contact me at 909-592-1147.

Regards,

MIKE MOHAJER, Member
Los Angeles County IWM Task Force
MikeMohajer@yahoo.com
P.O. Box 3334, San Dimas, Ca 91773-7334

CC: Task Force Members and Alternate Members



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DEAN D. EFSTATHIOU
CHAIRMAN

August 13, 2008

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

Dear Ms. Brown:

**DISCUSSION OF POTENTIAL OPTIONS FOR THE ORGANIC DIVERSION FACILITIES
SITING PROJECT (STRATEGIC DIRECTIVE 6.1)**

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, I would like to commend the California Integrated Waste Management Board (Waste Board) for its efforts in promoting environmentally beneficial alternatives to reduce the disposal of organics. However, as listed below, we have a number of concerns regarding the Waste Board's Directive 6.1 and its staff report for Item 11 of the June 17, 2008, Waste Board meeting. On June 10, 2008, this item was considered by the Waste Board's Strategic Policy Development Committee without addressing concerns expressed by stakeholders.

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 within 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, 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.

We would like to offer the following comments/concerns regarding your staff report on options for siting of organic diversion facilities as well as the Waste Board Strategic Directive 6.1.

1. The Waste Board needs to define the terms "Organic" and "Compostable Organic"

The term "organic" is not defined by statute or regulation. Webster's Dictionary defines the term "organic" as: "*of, relating to, or derived from living organisms*" and "*of, relating to, or containing carbon compounds.*" As such, based on the Statewide Waste Characterization Study released by the Waste Board in December 2004, the "organic" fraction of solid waste disposed in California landfills ranges between 70 and 80 percent.

The June 17, 2008, Waste Board staff report states that "*Organic materials comprise over 30 percent of the waste stream disposed in California landfills.*" This statement is inconsistent with the Waste Board's 2004 Statewide Waste Characterization Study as well as the staff report that was presented to the Waste Board on December 11, 2007. In that report, staff indicated that "*Compostable organic materials comprises approximately 25 percent, or about 10 million tons, of what is disposed in landfills annually, and paper and woody portion of Construction & Demolition debris constitute another 13 or so million tons.*" Thus, it appears that Waste Board staff made a distinction between the terms "organic" and "compostable organic," but did not make an attempt to define the terms.

The terms "organic" and "compostable organic" materials need to be clearly defined to avoid confusion among the legislature and regulatory bodies, regulated communities, and local governments that ultimately have to bear the cost. Furthermore, there is a need for the Waste Board to reexamine its Strategic Directive 6.1, which calls for 50 percent reduction in the amount of "organics" being disposed in landfills by 2020. Based on the December 11, 2007, Agenda Item 15, it appears that the goal is focused on the composting/diverting of source separated streams, such as green waste, food waste, manure, etc., and not the total "organics" currently being disposed in landfills. If the latter is true, jurisdictions in California may be faced with achieving a mandatory diversion rate of approximately 85 percent by 2020.

2. The Waste Board needs to consider the findings of State and local efforts with regards to conversion technology

The June 17, 2008, Waste Board staff report indicates "*Organic diversion facilities include compost, conversion technology, chipping and grinding, and transfer stations.*" The Task Force commends the Waste Board for its recognition and inclusion of conversion technology into the organic diversion facilities category. However, we are disappointed with the Waste Board's staff report and recommendations which fail to recognize the findings of (a) the Waste Board's own three-year study on conversion technologies conducted pursuant to AB 2770, Chapter 740 of the 2002 State Statutes;

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August 13, 2008
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(b) the conversion technology efforts by the County of Los Angeles; (c) the State Bioenergy Action Plan; and (d) the State Interagency Bioenergy Working Group. Unfortunately, these findings were not considered by the Strategic Policy Development Committee on June 10, 2008. We strongly believe that the Waste Board needs to consider these studies and efforts prior to any further action. This reevaluation will further substantiate that the Waste Board must place a greater reliance on the development and siting of conversion technology facilities rather than focusing on "soft" solutions such as forming more committees and conducting unnecessary duplicative studies.

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

LL:kp
P:\SEC\Organics Facilities Letter.doc

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