



LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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GAIL FARBER-CHAIR
MARGARET CLARK-VICE CHAIR

June 8, 2010

Margo Reid Brown, Acting Director
California Department of Resources
Recycling and Recovery (CalRecycle)
1001 I Street, PO Box 4025
Sacramento, CA 95812-4025

Dear Ms. Brown:

REQUEST REMOVAL OF DRAFT FINAL PROJECT REPORT: LIFE CYCLE ASSESSMENT AND ECONOMIC ANALYSIS OF ORGANIC WASTE MANAGEMENT AND GREENHOUSE GAS REDUCTION OPTIONS FROM PUBLIC DOMAIN

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), I am writing to request that the *Draft Final Project Report: Life Cycle Assessment and Economic Analysis of Organic Waste Management and Greenhouse Gas Reduction Options* (Draft LCA Report) be removed from the public domain on CalRecycle's website due to the deficiencies inherent in the report as acknowledged by CalRecycle staff on April 19, 2010.

The goal of the Draft LCA Report is to "identify and quantify (to the fullest extent possible) the life cycle environmental and costs aspects associated with alternatives to manage organic wastes and recyclables currently being disposed of in landfills in California." The results and findings of the Draft LCA Report were intended to be used to provide information and data to CalRecycle to support the development of recommendations and policies for organic wastes and recyclables management efforts in the coming years.

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 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

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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.

The Task Force has long been in support of more comprehensive life cycle evaluations of a variety of solid waste management options, in order to provide policy and decision makers with the critical tools and information they need to make informed decisions. However, the Task Force has been concerned with the development of this particular tool and provided extensive comments on the Draft LCA Report. Specifically, the Task Force expressed concerns regarding a lack of evaluation of key options such as (1) conversion technologies, despite availability of performance data; (2) a lack of discussion of certain environmental impacts such as surface and groundwater pollution, wildlife impacts, litter, noise pollutions, odor, discharge to public wastewater treatment facilities, or criteria air pollutant emissions; and (3) incorrect or skewed assumptions in the Draft LCA Report that may create a bias towards specific management scenarios and requested CalRecycle address these deficiencies prior to the Draft LCA Report being finalized.

On April 19, 2010, Cal Recycle hosted a workshop to discuss the Draft LCA Report and its interim findings. CalRecycle staff acknowledged several deficiencies in the report making it potentially misleading, and recommended that it not be quoted, cited, or *“used as a basis for policy decisions regarding organics management.”* Although the Draft LCA Report includes this disclaimer, we have strong reservations that, because it is posted on CalRecycle’s website and in the public domain, it may nevertheless be used as a basis for decision making and may lead to policies or legislation, both within and outside of California, that may be ultimately detrimental to the environment. Because California is at the forefront of addressing climate and environmental issues, this report may be considered definitive by many stakeholders and decision makers; therefore it is critical to get it right before any findings are published in any form.

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Therefore, given its multiple inaccuracies as identified by many stakeholders and acknowledged by CalRecycle staff, we urge you to remove the Draft LCA Report from the public domain. We appreciate your consideration of our comments, and we look forward to our continued collaboration in developing a more sustainable integrated solid waste management system in California. Should 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
Council Member, City of Rosemead

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cc: CalRecycle (Mark Leary, Howard Levenson)
Each Member of the Integrated Waste Management Task Force