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EP-2

December 6, 2006

Mr. Yazdan Emrani, Co-Chair
2006 California Infrastructure Report Card
American Society of Civil Engineers
Advanced Infrastructure Management, Inc.
601 South Valencia, Suite 250
Brea, CA 92823-6357

Mr. Mike Kincaid, Co-Chair
2006 California Infrastructure Report Card
American Society of Civil Engineers
575 Market Street, Suite 2125
San Francisco, CA 94105-2870

Dear Messrs. Emrani and Kincaid:

**2006 ASCE CALIFORNIA INFRASTRUCTURE REPORT CARD
SOLID WASTE SECTION**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the efforts of the California chapter of the American Society of Civil Engineers (ASCE) in developing the *2006 ASCE California Infrastructure Report Card*, published on September 27, 2006. The Report Card can be an effective tool for evaluating the condition of our infrastructure, and communicating that information in an easy-to-digest manner for both decision makers, and the general public. After careful review, the Task Force would like to offer several comments pertaining to the solid waste portion of the Report Card, and its public policy implications for the State as a whole.

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

The Task Force believes the Report Card did not identify/address several major waste management challenges facing California and local governments. Because decision makers may use the Report Card as a reference, the Task Force respectfully recommends that the following comments be addressed and incorporated into future Statewide and Countywide Report Cards.

1. On Page 8 of the Report Card, it stated that “Solid Waste systems are operated by a combination of **private (collection and transfer) and County (landfills) facilities**”, [emphasis added]. Unfortunately, this statement is inaccurate. Many local jurisdictions operate their own fleets and collect solid waste generated by their citizens. Furthermore, many transfer/processing stations are owned and operated by public entities, while a majority of operating landfills in California are owned and operated by the private sector.
2. The Report Card omitted a key component of California’s integrated waste management system—transformation facilities. Although three transformation facilities exist in the State, they provide a valuable disposal option for local governments, which is necessary for the State’s solid waste infrastructure to remain flexible and robust. Moreover, many local governments rely on these facilities for diversion credit in order to comply with the State’s 50 percent waste reduction mandate.
3. The Report Card did not elaborate on conversion technologies (processes capable of converting post-recycled residual solid waste into useful products, green fuels, and clean, renewable energy) and the necessity to make these technologies an integral component of the State’s integrated solid waste management infrastructure. The Task Force would like to emphasize the following demonstrated benefits of conversion technologies as reinforced by

recent scientific studies, including those conducted by the Universities of California at Davis and Riverside under contract with the California Integrated Waste Management Board (CIWMB):

- Conversion technologies would decrease net air pollutant emissions and greenhouse gases. (This benefit is timely since Governor Schwarzenegger recently enacted landmark legislation to reduce greenhouse gas emissions.)
- By processing post-recycled materials, conversion technologies would create an incentive to increase recycling by managing materials that are otherwise not recyclable or reusable.
- Conversion technologies are an effective and environmentally preferable alternative to landfilling. Decision makers need to be provided with environmentally preferable and economically viable options for the management of post-recycled residual solid waste when dwindling landfill capacity creates increased solid waste management costs.
- Conversion technologies would produce renewable energy and green fuels, thereby reducing our dependence on foreign oil and insulating California residents from market fluctuations. Furthermore, conversion technologies can offset environmental impacts associated with the extraction, refining, and transportation of fossil fuels.
- The technological sophistication of conversion technologies would produce high-level jobs, further adding to a healthy and productive economy.

Most importantly, decision makers need to know that in California current technically inaccurate statutes discourage conversion technology research and development. Decision makers must recognize that changes in State law are needed to allow conversion technologies to compete on a level playing field in the private sector with other solid waste management options based on their economic viability and relative environmental impacts and benefits.

4. The Report Card failed to recognize the CIWMB's recent estimate that the State could face a \$1.8 billion exposure for the ongoing maintenance of closed solid waste landfills by mid-century because many facility owners/operators lack the necessary financial resources to maintain their site after closure (*Strengthening Public Safety of Waste Facilities and Surface Mines*, California Legislative Analyst Office, April 2006). We believe this information is vital to policy and decision makers because without a sound financial assurance mechanism, the community and environment would not be protected.

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Again, we hope these comments will be analyzed thoroughly and incorporated into future ASCE documents. In addition, the Task Force is interested in participating in the development of future report cards and other ASCE activities that may relate to solid waste issues. 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
Councilmember, City of Rosemead

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