October 18, 2006

Margo Reid Brown, Chair
California Integrated Waste Management Board
Cal-EPA Building
1001 “I” Street
Sacramento, CA 95812-4025

Dear Chairperson Brown:

CONVERSION TECHNOLOGIES

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), I would like to express our support for the California Integrated Waste Management Board’s (Waste Board) efforts to promote environmentally beneficial alternatives to traditional disposal options for solid waste. Among the most promising alternatives are conversion technologies -- processes capable of converting post-recycled residual solid waste into useful products, green fuels, and clean, renewable energy.

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 an overall 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.

We were interested to see a comprehensive discussion on conversion technologies at your August 15, 2006, meeting (Agenda Item 22-Discussion of the 2006 Emerging Technologies Forum and Request for Direction on Next Steps Relevant to Emerging Technologies), however the item was pulled from consideration before we could submit comments. We requested a presentation from your staff regarding this item, however the presentation was
delayed pending the item’s reconsideration. In the meantime, on September 12, 2006, the Waste Board approved allocations for a number of conversion technology-related projects (Agenda Item 22-Consideration of Allocation Proposals to be Funded from the Integrated Waste Management Account for Fiscal Year 2006/07). These allocations were based on staff’s recommendations from the previous month’s Agenda Item 22. The Task Force is very concerned that these allocations were approved without the benefit of sufficient discussion dedicated to this important subject, and we request that these allocations be reconsidered or delayed until such discussion can occur.

For example, at its September 12, 2006, meeting, the Waste Board approved $200,000 towards a pilot anaerobic digestion facility. Although anaerobic digestion technologies are an effective way to manage organic waste based on available data from operating facilities in Europe and those from the University of California at Davis, we believe accelerating the research and development of other technologies, especially those that currently don’t benefit from an established regulatory pathway and diversion credit eligibility, would more effectively leverage the Waste Board’s funds. Thus, we urge the Waste Board to direct funding toward the development of a demonstration conversion technology facility that would supply data currently unavailable to decision-makers and help establish the technical, economic and environmental feasibility of these technologies. In addition, we trust that the conversion technology demonstration project currently being developed by the Task Force’s conversion technology committee (of which the Waste Board is a member) would be considered as a strong candidate for future funding.

We are currently witnessing in California and throughout the Country an unprecedented surge of interest, support, and investment in renewable energy, biofuels, green technologies, and alternatives to landfilling. Furthermore, a host of bond measures and initiatives are on the November 2006 ballot that would potentially pour significant funds into these areas. Although California is leading the way, the development of conversion technologies in the State has stalled.

In 2001, the Waste Board began the development of regulations for permitting conversion technologies, but those regulations were suspended several times. Recognizing that Californians are clamoring for environmental responsibility and more sustainable communities, there is a groundswell of support for the Waste Board to act. Thus, we strongly urge the Waste Board to also move conversion technology regulations forward and promote the development of conversion technology facilities in California. These actions would be consistent with the recommendations identified in California’s adopted Bioenergy Action Plan, the Governor’s various Executive Orders regarding climate change, biomass, renewable energy and alternative fuels, as well as the Waste Board’s core mission to “reduce waste, promote the management of all materials to their highest and best use, and protect public health and safety and the environment.”
We appreciate your consideration of these comments and look forward to working with the Waste Board in realizing our mutual goal of a more sustainable California. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147, or you may contact me at (626) 569-2100.

Sincerely,

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

cc:  Governor Arnold Schwarzenegger
    Senate President Pro Tem Don Perata
    Assembly Speaker Fabian Núñez
    Special Assistant to the Governor for Energy and Environmental Technologies
    Secretary of the California Environmental Protection Agency (Linda S. Adams)
    California's Undersecretary for Energy Affairs (Joe Desmond)
    Secretary of California Department of Food and Agriculture (A.G. Kawamura)
    Each Member of the California Integrated Waste Management Board
    Executive Director, California Integrated Waste Management Board (Mark Leary)
    Each Member of the California Energy Commission
    The California Energy Commission (Susan Brown)
    Each Member of the County of Los Angeles Board of Supervisors
    Each City Mayor in the County of Los Angeles
    California State Association of Counties
    League of California Cities
    League of California Cities, Los Angeles County Division
    Southern California Association of Governments
    San Gabriel Valley Council of Governments
    South Bay Cities Council of Governments
    Solid Waste Association of North America
    Each Member of the Los Angeles County Regional Planning Commission
    Each Member of the City of Los Angeles' Ad Hoc RENEW LA Committee
    County Sanitation Districts of Los Angeles County
    Biomass Coordinating Council/American Council on Renewable Energy
    Each Member of the Los Angeles County Integrated Waste Management Task Force and its Alternative Technology Advisory Subcommittee