



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

March 31, 2011

Mr. Ken Decio, Contract Manager
California Department of Resources Recycling and Recovery
P.O. Box 4025, MS 10-A
Sacramento, CA 95812

Dear Mr. Decio:

**COMMENTS REGARDING STATEWIDE ANAEROBIC DIGESTER FACILITIES
FOR THE TREATMENT OF MUNICIPAL ORGANIC SOLID WASTE
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
RELEASED FOR PUBLIC COMMENT FEBRUARY 14, 2011**

The Los Angeles County Integrated Waste Management Task Force (Task Force) is fully supportive of efforts by the State of California to promote the development of alternatives to landfills. As you know, the Task Force has been a consistent supporter of conversion technologies as a way to manage post-recycled residual solid waste. We appreciate the resources the California Department of Resources Recycling and Recovery (CalRecycle) has developed for local governments and potential project developers over the last few years. This draft Program Environmental Impact Report (PEIR) is another tool that can be used by local and regional decision makers who are considering anaerobic digestion (AD) projects. The draft PEIR provides analysis of AD facilities as a starting point for local jurisdictions in preparing California Environmental Quality Act compliance for local AD projects.

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 by the County and the 88 cities in the County of Los Angeles. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally sound solid waste management system in the County of Los Angeles, the Task Force also addresses issues impacting the solid waste management 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 is supportive of the draft PEIR as a whole; however, we would like to offer the following comments for the record:

- A primary objective identified for this PEIR is to “support CalRecycle Strategic Directive 6.1: to reduce the amount of organics in the waste stream by 50 percent by 2020.” The Task Force would like to note for the record that Strategic Directive 6.1 is not a legislative or regulatory mandate, but rather a goal adopted by CalRecycle.

- We are concerned that the mitigation measures identified in the PEIR and summarized in Table 1.1 may be too rigid and for some projects, unnecessary, and costly resulting in new barriers to certain projects wishing to make use of the PEIR. Therefore, we request the PEIR be amended to clearly note that not all projects would result in significant impacts in all the categories identified, and that although the impacts may be mitigated by the measures suggested in the table, there are alternative mitigation measures available, but ultimately the local permitting requirements should take precedence.
- The draft PEIR briefly discusses thermal conversion including non-combustion thermal conversion technologies as an alternative for organics diversion. At this point in time and based on the narrowly defined objectives identified for the project in question, anaerobic digestion was identified as the preferred alternative. However, other technologies are highly capable of diverting solid waste and organics from landfill disposal in an environmentally safe and economically viable manner. As acknowledged in the PEIR, "conversion technologies are part of the longer-term strategy for organics diversion." Therefore, we urge CalRecycle to expedite the development of additional PEIRs for various types of conversion technologies including non-combustion thermal processes. Several jurisdictions throughout California including the County of Los Angeles, Salinas Valley Solid Waste Authority, City and County of Santa Barbara among others are considering various types of conversion technologies other than anaerobic digestion for solid waste management and diversion of organics from landfill disposal and would potentially benefit from such a resource.

We appreciate CalRecycle's efforts in developing the draft PEIR. Specifically, we would like to thank Mr. Mark de Bie and Mr. Ken Decio for their informative presentation to our Alternative Technology Advisory Subcommittee on March 17, 2011. We look forward to the timely certification of this document, so that it can be used by local governments and potential project developers. If you have any questions regarding our comments, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147 or mikemohajer@yahoo.com.

Sincerely,



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

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cc: Mark Leary, Acting Director, CalRecycle
CalRecycle, (Howard Levenson, Elliot Block, Mark de Bie, Cara Morgan)
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Alternative Technology Advisory Subcommittee