



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](http://www.lacountyiswmtf.org)

DONALD L. WOLFE  
CHAIRMAN

October 25, 2007

The Honorable Alex Padilla  
State Capitol Room 4032  
Sacramento, CA 94249-12345

Dear Senator Padilla:

**SENATE BILL 1020 (PROPOSED SEPTEMBER 6, 2007 AMENDMENTS)  
STATEWIDE MANDATORY WASTE DIVERSION RATE INCREASE TO 75 PERCENT**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) continues to oppose Senate Bill 1020 (SB 1020), which among other things, proposes to increase the waste diversion mandate imposed on local governments from 50 percent to 75 percent effective January 1, 2020.

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 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.

SB 1020, if enacted as proposed on September 6, 2007 (copy enclosed), would increase the diversion rate from 50 percent to 60 percent by 2012 and to 75 percent by 2020, without addressing the inherent deficiencies in the State's diversion rate measurement system, or providing local governments with the critical resources necessary to attain a significant increase in diversion. Local governments across the State have already invested millions of dollars in the recycling infrastructure, the development and

implementation of waste reduction programs, and the mathematical accounting and documentation required to meet the current 50 percent mandate. The most cost-effective programs have already been implemented, along with a variety of feasible niche programs in order to meet the waste diversion mandates outlined in AB 939.

While the Task Force supports efforts to develop additional waste processing, recycling, and composting opportunities, SB 1020 would unnecessarily burden local governments by imposing mandates to force adoption of commercial recycling ordinances and inspection/monitoring of businesses for compliance when many businesses have already implemented recycling measures on a voluntary basis. For subsequent diversion increases to be possible, major investment in new programs and more significant changes to the solid waste management system in California, including its waste management hierarchy, will be required. Furthermore, we are concerned that the proposed language provides diversion credit for very narrowly defined types of conversion technologies, unfairly prohibiting development of most other viable technologies which are capable of processing various types of waste, including that which is not currently feasible by traditional recycling measures.

Finally, we continue to have significant concerns regarding the proposed legislation as voiced in our letters dated April 18 and May 23, 2007 (enclosed). These concerns include among others:

- The inherent issues in the current diversion rate measurement system and the many potential pitfalls in transitioning to a disposal based system.
- The lack of emphasis on producer responsibility. We believe that the greatest waste reduction gains can be achieved in the future by requiring manufacturers to take responsibility for their products and implement sustainable recovery programs.
- The need to enhance the State's recycling market development efforts.
- The need to conduct a cost/benefit and feasibility analysis of an increased diversion mandate, in conjunction with all affected stakeholders, and make a determination that the proposed increase in the diversion rate is justified.

Once again, the Task Force sincerely extends an invitation to you and your staff to attend a future Task Force meeting, so that we may share our local perspectives and engage in meaningful dialogue on this vital issue. We share a mutual goal of increasing diversion from landfills, and protecting the health and safety of all our residents. We hope our invitation is accepted in the spirit of collaboration and support in which it was sent.

The Honorable Alex Padilla  
October 25, 2007  
Page 3

Task Force meetings are generally scheduled for 1:00 p.m. on the third Thursday of each month, and are held at the County of Los Angeles' Department of Public Works Headquarters, 900 South Fremont Avenue, Alhambra, California 91803. Agendas and minutes of previous and future meetings are available online at [www.lacountyiswmtf.org](http://www.lacountyiswmtf.org).

If 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

VJ/CS:cw  
P:\Sec\SB1020 Taskforce

Enc.

cc: Governor Arnold Schwarzenegger  
Senate President Pro Tem Don Perata  
Assembly Speaker Fabian Nuñez  
Senator Dick Ackerman, Minority Leader  
Assembly Member Michael Villines, Minority Leader  
Senator Patricia Wiggins  
Each Member of the Assembly Appropriation Committee  
Each Member of the Los Angeles County Legislative Delegation  
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  
Each Member of the County Sanitation Districts of Los Angeles County  
Each Member of the Los Angeles County Integrated Waste Management Task Force  
Each City Recycling Coordinator in Los Angeles County

AMENDMENTS TO SENATE BILL NO. 1020  
AS AMENDED IN ASSEMBLY JUNE 26, 2007

## Amendment 1

In line 1 of the title, after "add" insert:

Sections 40103, 40113, 41783.4, 41783.5, 41783.6, and 42649 to, and to add

## Amendment 2

On page 2, before line 1, insert:

SECTION 1. Section 40103 is added to the Public Resources Code, to read:  
40103. "Anaerobic digestion" means the production of methane fuel or chemical feedstock from the bacterial breakdown of biodegradable organic and biomass derived material from urban waste, agricultural residues, and forestry sources. The process involves the natural biodegradation of organic materials in the absence of oxygen to produce methane and carbon dioxide in an engineered and controlled environment. Anaerobic Digestion is not a form of transformation as that term is defined pursuant to Section 40201.

SEC. 2. Section 40113 is added to the Public Resources Code, to read:

40113. "Lignocellulosic ethanol processing" means the production of ethanol fuel or chemical feedstock from lignocellulose, a structural material comprised primarily from cellulose, hemilose and lignin, contained in organic and biomass-residue-streams found in urban waste, agricultural residues, organic materials, and forestry sources. The process involves in-vessel enzymatic or chemical hydrolysis of cellulose to produce free sugars, which in turn are biologically fermented to produce ethanol in an engineered and controlled environment. Lignocellulosic ethanol processing is not a form of transformation as that term is defined pursuant to Section 40201.

SEC. 3. Article 4 (commencing with Section 40520) is added to Chapter 3 of Part 1 of Division 30 of the Public Resources Code, to read:

## Article 4. Statewide Recycling

40520. The Legislature finds and declares all of the following:

(a) Since the enactment of this division, local governments and private industry have worked jointly to create an extensive material collection and recycling infrastructure and have implemented effective programs to achieve a statewide diversion rate above 50 percent.

(b) Although the state now leads the nation in waste reduction and recycling, the state continues to dispose of more than 40 million tons of waste each year, which is more than the national average on a per capita basis. Additional efforts must be undertaken to divert more solid waste from disposal in order to conserve scarce natural resources.

(c) Solid waste diversion and disposal reduction requires the availability of adequate waste processing and composting capacity. Existing capacity represents a



valuable asset that must be sustained and expanded to provide the additional processing infrastructure necessary to meet the needs of a growing population.

(d) To meet the objectives of the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code), there is an urgent need to reduce greenhouse gas emissions from all aspects of solid waste handling through increased source reduction, reuse, recycling, composting, and those new emerging technologies that the California Integrated Waste Management Board and the Legislature determine to be appropriate in meeting California's environmental and greenhouse gas reduction goals.

(e) The siting of solid waste processing and composting facilities would benefit from life-cycle and multimedia analyses that identify both environmental impacts and the benefits of proposed projects. It is a primary purpose of this legislation to encourage the development of the additional waste processing and composting capacity that is needed to meet state objectives for decreasing disposal by identifying incentives for local governments to locate and approve facilities that meet and exceed their capacity needs.

(f) It is the intent of the Legislature that the board:

(1) Work with stakeholders to refine a disposal reduction measurement system in order to reduce administrative burdens on the board and local governments and to provide an improved measurement system for accurately determining the state's progress in reducing disposal.

(2) Work with stakeholders to develop a mechanism for recognizing local agencies that make significant contributions to the state's overall waste reduction and recycling objectives through the siting of facilities for the processing, recycling, and composting of materials diverted from the solid waste stream.

(3) Continue to encourage all commercial generators to work with their service providers to increase recycling and discourage illegal scavenging.

(4) Develop state disposal-reduction requirements that cap disposal at 2006 levels until 2012, and then reduce disposal from 2006 levels so that by 2013 the state's disposal is 25 percent lower (equivalent to 60 plus percent) and by 2020 the state's disposal is 50 percent lower (equivalent to 75 percent) than 2006 disposal levels.

(g) The provision in existing law that confers broad discretion on local agencies to determine aspects of solid waste handling that are of local concern has significantly contributed to the statewide diversion rate exceeding 50 percent, and further progress toward decreasing disposal requires that this essential element of local control be preserved. By setting new statewide disposal reduction requirements in Section 40522, the Legislature does not intend to limit the rights afforded to local governments pursuant to Section 40059, nor does it intend to modify or abrogate in any manner the rights of either party to any solid waste handling franchise or contract previously granted.

(h) The state is dedicated to the wise use of public funds and the conservation of natural resources. In order to lead the way for local governments, private industry, and California's citizens, state agencies shall achieve the waste reduction, recycling, and composting requirements at least three years in advance of the dates set forth in Section 40522.

40522. (a) At least 60 percent of all solid waste generated in this state shall be source reduced, recycled, or composted by December 31, 2012.

(b) It is the objective of the state to ensure that adequate capacity is available so that at least 75 percent of all solid waste generated in this state shall be source reduced, recycled, or composted by January 1, 2020, and thereafter.

SEC. 4. Section 41783.4 is added to the Public Resources Code, to read:

41783.4. For any city, county, or regional agency source reduction and recycling element updated and submitted to the board after January 1, 2008, the 50 percent diversion requirement specified in paragraph (2) of subdivision (a) of Section 41780 may include anaerobic digestion, as defined in Section 40103. Anaerobic digestion shall not be considered disposal under a future disposal based compliance system.

SEC. 5. Section 41783.5 is added to the Public Resources Code, to read:

41783.5. (a) For any city, county, or regional agency source reduction and recycling element updated and submitted to the board after January 1, 2008, the 50 percent diversion requirement specified in paragraph (2) of subdivision (a) of Section 41780 may include lignocellulosic ethanol processing, as defined in Section 40113, if the board finds both of the following:

(1) The lignocellulosic ethanol processing facility will advance the demonstration of commercially viable bioenergy processing technologies to produce renewable transportation fuels or other renewable value-added products consistent with California's greenhouse gas reduction targets and the July 2006 Bioenergy Action Plan for California.

(2) The organic feedstock for any lignocellulosic ethanol processing facility is derived from one or more of the following waste materials:

(A) Material that was previously used as noncomposted mulch.

(B) Material that was previously disposed or used for beneficial reuse at a solid waste landfill, including the use as alternative daily cover, which constituted diversion through recycling pursuant to Section 41781.3.

(C) Material that is approved for this use by the board.

(b) Lignocellulosic ethanol processing that complies with this section shall not be considered disposal under a future disposal based compliance system.

SEC. 6. Section 41783.6 is added to the Public Resources Code, to read:

41783.6. For purposes of meeting the statewide requirements set forth in Section 40522, the board shall include anaerobic digestion, as defined in Section 40103, and lignocellulosic ethanol processing, as defined in Section 40113, if the lignocellulosic ethanol processing projects meet the requirements of Section 41783.5.

SEC. 7. Section 42649 is added to the Public Resources Code, to read:

42649. (a) On or before January 1, 2010, the owner or operator of a business that contracts for solid waste services or generates more than four cubic yards of total solid waste and recyclables per week, and is located in a county with a population of 200,000 or more shall implement a recycling program in accordance with a recycling ordinance lawfully adopted by a city, county, city and county, regional agency, or solid waste authority, or other joint powers authority.

(b) Commercial recycling ordinances adopted pursuant to this section shall include, at a minimum, all of the following:

(1) Enforceable requirements to source separate specified recyclable materials from solid waste.

(2) Enforceable requirements requiring commercial generators to subscribe to a basic level of recycling service that includes, at a minimum, the collection of recycling materials or specific provisions for authorized self-hauling.

(3) Education, implementation, and enforcement provisions.

(c) On or before July 1, 2008, the board shall make one or more model commercial recycling ordinances available to local agencies to facilitate compliance with this section.

(d) On or before July 1, 2009, each city, county, city and county, solid waste authority, or other joint powers agency located within counties with a population of 200,000 or more shall have an adopted commercial recycling ordinance that is consistent with this section.

(e) For the purposes of this section, "business" means a commercial entity operated by a firm, partnership, proprietorship, joint stock company, corporation, or association that is organized for profit or nonprofit. "Business" does not include multifamily dwelling units.

(f) This section does not apply to owners or operators of businesses that meet one or more of the following criteria:

(1) Meet specific exemption criteria or criteria contained in a local commercial recycling ordinance for an alternative type of recycling service due to space constraints for recycling containers.

(2) Are subject to a locally adopted commercial recycling ordinance that is equivalent to or more stringent than the requirements prescribed by this section.

(g) Nothing in this section is intended to limit the authority of local agencies to adopt, implement, or enforce local commercial recycling ordinances that are more stringent or comprehensive than the requirements of this section or limit the authority of local agencies in counties with a population of less than 200,000 to require commercial recycling.

(h) Nothing in this section modifies or abrogates in any manner either of the following:

(1) Any franchise previously granted or extended by any county or other local government agency.

(2) Any contract, license, or permit to collect solid waste previously granted or extended by a city, county, city or county, or other local government agency.

SEC. 8. No reimbursement is required by this act pursuant to Section 6 of Article XIII B of the California Constitution because a local agency or school district has the authority to levy service charges, fees, or assessments sufficient to pay for the program or level of service mandated by this act, within the meaning of Section 17556 of the Government Code.

#### Amendment 3

On page 2, strike out lines 1 to 19, inclusive, and strike out pages 3 to 6, inclusive



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](http://www.lacountyiswmtf.org)

DONALD L. WOLFE  
CHAIRMAN

May 23, 2007

The Honorable Alex Padilla  
State Capitol Room 4032  
Sacramento, CA 95814

Dear Senator Padilla:

**INVITATION TO THE LOS ANGELES COUNTY SOLID WASTE MANAGEMENT  
COMMITTEE/INTEGRATED WASTE MANAGEMENT TASK FORCE FOR  
DISCUSSION OF SENATE BILL 826 AND SENATE BILL 1020**

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), we would like to extend to you an open invitation to attend one of our meetings to discuss your legislation, Senate Bills 826 and 1020.

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. 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.

Solid waste management, and its impact on California's environment, presents both challenges and opportunities to State and local governments. Your experience at the City of Los Angeles has provided you with insight into the challenges faced by local governments, including those created by State mandates. As you may know, the Task Force expressed strong concerns regarding Senate Bill 1020, which proposes to increase the mandatory diversion rate in California to 75 percent by 2012 (copy enclosed). The Task Force also has concerns related to SB 826, which would adopt

The Honorable Alex Padilla  
May 23, 2007  
Page 2

additional environmental justice criteria for solid waste management facilities. SB 826 would make it more difficult to site the necessary recycling and diversion infrastructure necessary to meet the mandatory 75 percent diversion targets as proposed by SB 1020.

The Task Force's diverse membership regularly discusses the potential impacts of legislation on Los Angeles County, considered to have one of the most complex solid waste management systems in the United States. The Task Force would like to extend to you an invitation to attend our next meeting, scheduled for June 21, 2007, so that we may share our local perspectives. We share a mutual goal of increasing diversion from landfills, and protecting the health and safety of all our residents. Los Angeles County strives to enhance and maintain California's leadership position on environmental innovation and stewardship.

Task Force meetings are generally scheduled for 1 p.m. on the third Thursday of each month, and are held at the County of Los Angeles' Department of Public Works Headquarters, 900 South Fremont Avenue, Alhambra, California 91803. We would be pleased to have your staff regularly attend our meetings. Agendas and minutes of previous and future meetings are available online at [www.lacountyiswmtf.org](http://www.lacountyiswmtf.org).

If you have any questions, you may contact me at (626) 288-7308 or you may contact Mr. Mike Mohajer of the Task Force at (909) 592-1147. We look forward to seeing you at our upcoming Task Force meeting.

Sincerely,

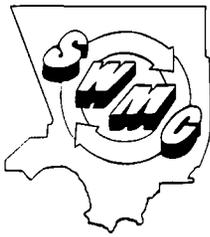
*Margaret Clark*

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

CP/CS:cw

Enc.

cc: Each Member of the Los Angeles County Integrated Waste Management Task Force



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](http://www.lacountyiswmtf.org)

DONALD L. WOLFE  
CHAIRMAN

April 18, 2007

The Honorable Alex Padilla  
State Capitol Room 4032  
Sacramento, CA 94249-12345

Dear Senator Padilla:

**SENATE BILL 1020 (AMENDED APRIL 9, 2007)  
STATEWIDE MANDATORY WASTE DIVERSION RATE INCREASE TO 75 PERCENT**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **strongly opposes** Senate Bill 1020 (SB 1020), which would increase the waste diversion mandate imposed on local governments from 50 to 75 percent, effective January 1, 2012, for the following reasons:

- The Bill does not provide diversion credit for activities and processes such as conversion of biomass to ethanol and/or other products through the use of conversion technologies.
- The Bill as currently drafted does not address the current deficiencies of the State Diversion Rate Measurement System.
- No cost/benefit analysis has been conducted to evaluate the public health impacts as well as the feasibility and associated costs of increasing the diversion rate mandate.
- The Bill does not provide local governments the financial and technical resources needed to achieve the higher diversion mandate.
- The Bill, while it places higher waste diversion mandates with related penalties on local governments, fails to recognize and place any shared responsibilities on state and regional governmental agencies as well as the California University and College systems, school districts and other special districts.
- The Bill does not place any responsibility on the manufacturing sector for reducing waste and product stewardship.

The Honorable Alex Padilla  
April 18, 2007  
Page 2

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 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.

The cornerstone of AB 939 is the mandate on local governments to reduce the amount of solid waste disposed at landfills by 50 percent by the year 2000 and thereafter. Failure to mathematically demonstrate achievement of this mandate may subject them to penalties of up to \$10,000 per day. SB 1020, if enacted, would increase the 50 percent waste diversion mandate to 75 percent beginning January 1, 2012.

First, while we share a common goal of reducing waste to protect our environment, it is difficult to understand why the State would increase the diversion rate without first addressing the inherent deficiencies of the State's Diversion Rate Measurement System. These deficiencies have caused many jurisdictions' diversion rates to fluctuate (and in some cases, the fluctuations were several orders of magnitude) from year to year despite program enhancements. This fluctuation is especially evident in Los Angeles County which hosts 89 jurisdictions, a diverse geography and economy, and the most complex solid waste management system in the nation. The System's faulty nature was acknowledged in a comprehensive report prepared by the California Integrated Waste Management Board and forwarded to the Legislature in 2002 entitled, "A Comprehensive Analysis of the Integrated Waste Management Act Diversion Rate Measurement System." Ultimately, the Report determined that there is no clear nexus between the current diversion rate measurement system and its ability to accurately determine a jurisdiction's compliance with the 50 percent waste reduction mandate. As of date, the primary legislative recommendations contained within the Report have yet to be enacted.

We are concerned that if the State continues to view the diversion rate measurement system as an absolute determination of a jurisdiction's compliance with AB 939 without viewing it as an indicator of the effectiveness of jurisdiction's program, SB 1020 will set up jurisdictions to fail. We believe that for meaningful waste reduction to occur, jurisdictions should be measured on the basis of their program implementation as identified in the California Integrated Waste Management Board's approved Source Reduction and Recycling Element (or other programs mutually agreed upon by the jurisdiction and the Waste Board).

Second, local governments across the State have invested millions of dollars in recycling infrastructure, the development and implementation of waste reduction programs, and the

mathematical accounting and documentation required to meet the current 50 percent mandate. After 17 years, most California jurisdictions have not only implemented the more cost-effective, higher-return programs, but also a variety of feasible niche programs (in fact, 1/3 of all diversion activities in the State occur within Los Angeles County). Thus, subsequent diversion increases will require major investments in new programs and more radical changes to the solid waste management system in California. However, without SB 1020 providing the financial and technical resources needed to achieve this higher diversion mandate, we are also concerned that jurisdictions will again be set up for failure since many are facing significant budgetary constraints.

It must be emphasized that the Task Force has a long track record in supporting initiatives that not only reduce the amount of waste disposed in landfills, but also improve the quality of life for all residents. We are ready to work with the Legislature to constructively address the challenges of solid waste management, and offer the following practical solutions as options for achieving the stated intent of this Bill:

- Provide full diversion credit and establish a level playing field for conversion technologies. Conversion technologies are state-of-the-art technologies capable of converting residual solid waste (waste that remains after all recyclables have been removed) into marketable products, including renewable clean energy. The California Integrated Waste Management Board has identified over 140 of these facilities operating in Europe and Asia. The City of Los Angeles' recently adopted RENEW LA Plan and the State's Bioenergy Action Plan and Climate Action Team Final Report all call for the development of these technologies in order to meet local and Statewide waste management, renewable energy, and climate action goals. The RENEW LA Plan calls for an aggressive program that will develop conversion technology facilities and dramatically reduce the need for landfill disposal. For example, the City's Mayor Antonio Villaraigosa has established a goal to develop a full-scale conversion technology facility by 2010. Providing full diversion credit will not only accelerate the research and development of conversion technologies without any direct governmental funding, but will ultimately reduce the amount of waste disposed at our landfills.
- Reform the State's mathematically-oriented Diversion Rate Measurement System to a program-based measurement system to fairly assess whether a jurisdiction's level of program implementation is adequate and appropriate.
- Place more emphasis on producer responsibility which is critical to sustaining the current and anticipated level of diversion activities. This principle is aimed at ensuring that businesses who place products on the market take responsibility for those products once they have reached the end of their life. We believe that the greatest waste reduction gains can be achieved in the future by requiring manufactures to take responsibility for their products and implement sustainable recovery programs.

The Honorable Alex Padilla  
April 18, 2007  
Page 4

- Improve and enhance the State's recycling market development efforts. As more markets are created, the diversion of materials will increase proportionately.
- Conduct a cost/benefit and feasibility analysis of an increased diversion mandate, in conjunction with all affected stakeholders, and make a determination that the proposed increase in the diversion rate is justified.

We stand ready to assist the Legislature in this endeavor and are confident this will result in a greater level of diversion and resource management for the State as a whole.

Therefore, the Task Force **strongly opposes** AB 1020. 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

CS:cw

P:\Sec\Senate Bill 1020

cc: Senate President Pro Tem Don Perata  
Assembly Speaker Fabian Nuñez  
Each Member of the Senate Environmental Quality Committee  
Each Member of the Los Angeles County Legislative Delegation  
California Integrated Waste Management Board  
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  
Solid Waste Association of North America  
South Bay Cities Council of Governments  
Each Member of the Los Angeles County Integrated Waste Management Task Force  
Each City Recycling Coordinator in Los Angeles County