June 14, 2011

Mr. Howard Levenson, Deputy Director  
Department of Resources Recycling and Recovery (CalRecycle)  
801 K Street, MS 19-01  
Sacramento, CA  95814

Dear Mr. Levenson:

COMMENTS REGARDING ORGANICS ROADMAP IV - 2011

The Los Angeles County Integrated Waste Management Task Force (Task Force) would like to commend CalRecycle on the development of the Organics Roadmap IV – 2011 (Roadmap) presented at the May 17, 2011, CalRecycle monthly meeting. The Task Force has been an active stakeholder involved with CalRecycle’s Strategic Directive 6.1 as well as the development of previous roadmaps. We appreciate CalRecycle’s significant progress in addressing two of the Task Force’s primary concerns in this current roadmap - (1) distinguishing between “organic” and “compostable organic” materials and (2) acknowledging the potential role of conversion technologies as a viable management option for organic waste.

While recognizing that the most recent Roadmap more concretely identifies conversion technologies as a viable potential option for managing residual organic wastes currently disposed in landfills, the Task Force is concerned that a strong emphasis continues to be placed on composting as a materials management option. Specifically, the Roadmap includes a disproportionate discussion of the barriers currently limiting additional development of composting rather than discussing the broader spectrum of more environmentally preferred management alternatives such as conversion technologies. Because of public health and safety issues, land constraints, and restrictive air regulations, composting does not appear to be a feasible alternative in many urban areas of California. As such, it is crucial that CalRecycle consider the broad spectrum of conversion technologies on an equal level, in terms of resource allocation and research, with other forms of materials management. Research conducted by CalRecycle, Los Angeles County, University of California, and others confirm the many benefits of conversion technologies including high diversion of post-recycled organic solid waste residuals from being landfilled, reduced environmental footprint, and broader flexibility in managing all categories of organic wastes.
Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [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 ten million. Consistent with these responsibilities and to ensure a coordinated, 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, 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 appreciate CalRecycle’s leadership on the important issue of organics diversion. Should 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

cc:  Mr. Mark Leary, Acting Director, CalRecycle
      CalRecycle (Brenda Smyth, Brian Larimore, Jacques Franco)
      Each member of the Los Angeles County Board of Supervisors
      Each City Mayor and City Manager 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
      Gateway Cities Council of Governments
      Each City Recycling Coordinator in Los Angeles County
      Each Member of the Los Angeles County Integrated Waste Management Task Force
      Each Member of the Alternative Technology Advisory Subcommittee