



DONALD L. WOLFE
CHAIRMAN

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

February 16, 2005

Ms. Rosario Marin, Chair
California Integrated Waste Management Board
Cal-EPA Building
1001 "I" Street
Sacramento, CA 95812-4025

Dear Chairperson Marin:

**CALIFORNIA'S COMPOST AND MULCH PRODUCING INFRASTRUCTURE
(SECOND ASSESSMENT REPORT)**

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), I would like to provide comments in regard to the report entitled "Second Assessment of California's Compost- and Mulch-Producing Infrastructure". This report was discussed at the January 18, 2005, California Integrated Waste Management Board (Waste Board) meeting (Agenda Item 10).

Pursuant to Section 40950 of the California Public Resources Code and Chapter 3.67 of the Los Angeles County Code, 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 prior to their submittal to the Waste Board. The Task Force is also very knowledgeable in various aspects of solid waste management and its membership includes appointees 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 industries, environmental groups, the public, and a number of other governmental agencies.

In the County of Los Angeles, the use of green waste as an Alternative Daily Cover (ADC) is an indispensable element of local jurisdictions' efforts to divert such materials from disposal pursuant to the California Integrated Waste Management Act of 1989 (AB 939). This is particularly important given the lack of adequate composting capacity and the difficulties encountered in permitting/developing this type of facilities due to requirements involving odor mitigating measures and compliance with air quality standards and the Federal Clean Water Act. Unfortunately, the subject report fails to

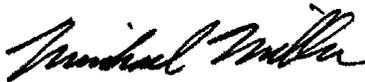
Ms. Rosario Marin
February 16, 2005
Page 2

thoroughly recognize these facts and claims the use of green waste as ADC being the major cause in furthering development of composting facilities. The Task Force would like to request that any further or future studies, including surveys, carried out by (or on behalf of) the Waste Board on the use of green waste as ADC, and/or in reference to its impact on the compost infrastructure in California, should be conducted in consultation with all affected stakeholders, including representatives from the landfill industry as well as local governments and the Task Force. The possible creation of a peer review committee that would review future reports would provide valuable input from such stakeholders.

We thank the Waste Board for its efforts toward developing markets for compost and mulch in the State. We stand ready to work with your Board and your staff in future studies and surveys dealing with compost/mulch and ADC.

I appreciate your Board's consideration of the Task Force's request on this matter. Should you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Sincerely,



Michael Miller, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force, and
Mayor, City of West Covina

AW:sm

P:\sec\TF Composting report0205

cc: Each Member of the California Integrated Waste Management Board
Mr. Mark Leary, Executive Director, California Integrated Waste
Management Board
California Integrated Waste Management Board (Patrick Schiavo, Diane Shimizu)
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
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
County Sanitation Districts of Los Angeles County
Each Member of the Los Angeles County Integrated Waste Management Task Force