



MARK PESTRELLA, PE, CHAIR  
SAM SHAMMAS, VICE - CHAIR

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)

May 3, 2023

The Honorable Anthony J. Portantino, Chair  
Senate Committee on Appropriations  
State Capitol, Room 412  
Sacramento, CA 95814

Dear Senator Portantino:

**OPPOSE UNLESS AMENDED - SENATE BILL 665 (ALLEN) AS INTRODUCED  
FEBRUARY 16, 2023 – PLASTIC WASTE: SINGLE-USE PLASTICS ALTERNATIVES:  
WORKING GROUP.**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) respectfully **opposes** Senate Bill 665 (SB 665), as introduced February 16, 2023, **unless amended** to address the recommendations enlisted below:

If enacted, the proposed legislation would require the California Environmental Protection Agency, by January 1, 2025, to establish a working group consisting of the Department of Resources Recycling and Recovery, the State Water Resources Control Board, the Department of Toxic Substances Control, the Office of Environmental Health Hazard Assessment, and the Ocean Protection Council to establish a framework for evaluating novel material types as they are developed to inform state policy decisions. The bill would further require the working group to, among other things, develop recommendations related to novel material types, including the appropriate marketing of the material, the handling of the material at the end of its useful life, and how the material needs to be treated in relation to existing state policies, rules, and regulations.

The Task Force agrees and supports establishment of a working group to identify and reduce the environmental impacts of plastic packaging and food service ware and ensuring that new materials are not harmful to the human health, the environment, and can be recycled or safely reused.

However, the State must be in a position to not only appropriately manage harmful materials as they are introduced in the market but to achieve the zero waste targets and accelerate a circular economy. The working group should include stakeholders that have the expertise to identify environmentally friendly solutions that include flexibility in

processing various waste streams, reducing dependency on landfills and incineration, while creating renewable energy/fuels, cleaning the air of pollutants and greenhouse gases, and reducing dependency on fossil fuels. As such, the Task Force respectfully **opposes** the bill unless it is **amended to address the following** concerns and recommendations:

- Section 40201 of the Public Resources Code (PRC) – Revise the definition of “Transformation” to **exclude** “Incineration”
- Section 42041 (aa) (2) of the PRC – Revise the definition to indicate that “*recycle*’ or ‘*recycling*’ does not include ‘*incineration*.’”
- Section 42375 (a) of the PRC – Amend to expand the inclusion of the California Air Resources Board (CARB), the Department of Public Health, and members from the solid waste management industry with technical expertise in the proposed working group.
- Section 42375 (c) of the PRC – Amend to have the working group include Conversion Technologies (CTs) and Advanced Recycling Technologies in recommendations, specifically how conversion technologies can be used to manage materials at the end of its useful life.
  - The working group shall also develop a set of recommendations to inform state policy related to novel material types, including, but not limited to, appropriate marketing of the material, how the material is handled at the end of its useful life, *how conversion technologies can be used to manage materials at the end of its useful life*, and how the material needs to be treated in relation to existing state policies, rules, and regulations.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939), 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 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, 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.

The Honorable Anthony J Portantino  
May 3, 2023  
Page 3

Based on the foregoing, the Task Force respectfully **opposes** SB 665 **unless amended** to address the recommendations in this letter. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at [MikeMohajer@gmail.com](mailto:MikeMohajer@gmail.com) or at (909) 592-1147.

Sincerely,



Sam Shammass, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force

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cc: Senator Allen  
Each Member and staff of the Senate Committee on Appropriations  
California State Association of Counties  
League of California Cities – Los Angeles County Division  
Each member of the Los Angeles County Board of Supervisors  
Fesia A. Davenport, Los Angeles County Chief Executive Officer  
San Gabriel Valley Council of Government  
South Bay Cities Council of Governments  
Gateway Cities Council of Governments  
Westside Cities Council of Governments  
Each City Mayor and City Manager in the County of Los Angeles  
Each City Recycling Coordinator in the County of Los Angeles  
Each Member of the Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force