



County Engineers Association of California

California State Association of Counties

Rosario Marin, Chairperson
California Integrated Waste Management Board
1001 "I" Street
Sacramento, Ca. 95814

RE: Draft Conversion Technologies Report to the Legislature

Dear Chairperson Marin:

On behalf of the California State Association of Counties (CSAC) and the Rural Counties Environmental Services Joint Powers Authority (ESJPA), we want to thank you for the opportunity to comment on the Waste Board's "Conversion Technologies Report to the Legislature", dated February 2005. Although we have not been actively involved in all of the forums where this issue has been addressed, both the ESJPA and CSAC are very interested in any outcomes of the report following its submittal to the Legislature.

The following comments are focused on the AB 939 diversion credit issue as it relates to conversion technology. These comments are consistent with the recently adopted CSAC policy which supports updating the AB 939 solid waste management hierarchy to promote development of conversion technology facilities by providing full diversion credit towards the State waste reduction mandate. Our comments are also based upon input from members of the County Engineer Association's Solid Waste Management Committee and from the Technical Advisory Group of the ESJPA.

Specifically, we are recommending that the Waste Board utilize the report's findings in formulating legislative changes that would do the following:

Revise the solid waste management hierarchy established by AB 939 by promoting the following waste management practices in order of priority: (A) source reduction; (B) recycling, composting and other beneficial/recovery uses such as conversion technologies; and (C) disposal by means of incineration and landfilling.

- (2) Provide jurisdictions with diversion credits as long as: (A) the jurisdiction has and will continue to implement its recycling and other diversion programs identified in its Board-approved Source Reduction and Recycling Element; and (B) the jurisdiction's facilities/programs are consistent with other requirements of the Board Resolution 2002-177, Option 3.

(3) Require conversion technology facilities to comply with standards of performance set by federal and state regulatory agencies.

We hope that these recommendations provide you with sufficient insight as to our perspective on the conversion technology issue. Please feel free to contact either of the undersigned if you would like further information regarding our joint position on this very important issue.

Sincerely,



Karen A. Keene
Legislative Representative
California State Association of Counties

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cc: Other Members, CIWMB
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