

SCAG

February 15, 2005

Mr. Fernando Berton
Waste Prevention & Market Development
California Integrated Waste Management Board
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Sacramento, CA 958.13

I would like to take the opportunity to comment on the draft Conversion Technology Report to the Legislature.

Landfills in the SCAG region are quickly reaching their capacity. Any technology that successfully diverts post-recycling solid wastes away from landfills should be encouraged and given incentives through regulation. The transformation of non-recyclable solid waste by conversion technologies, particularly when such wastes would otherwise have been destined for a landfill, should be eligible for fill' diversion credit.

For several years, SCAG has been an advocate of conversion technologies. SCAG's Solid Waste Task Force Report from April 1996 advocates that the State "provide full diversion credit to non-landfill transformation technologies." SCAG supports legislation that "removes any impediments to transformation or conversion technologies."

SCAG recognizes that no single technology or management practice is suitable for the handling of all generated waste. Our 2004 Growth Vision principle is to "Develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste."

Diversion technologies can meet that policy as part of an integrated waste management system. Because conversion technologies can help divert waste from landfills and create new economically beneficial products that can be used in place of virgin resources, conversion technologies can promote "sustainability for future generations," also part of the 2004 Growth Vision.

Conversion of solid waste does not occur in a vacuum. The CIWMB should include the South Coast Air Quality Management District with the California Air Resources Board in the efforts to study emissions from thermochemical and biochemical conversion technologies. Such cooperation could speed the process between study and regional implementation and avoid duplication of efforts.

SCAG currently is preparing its Regional Comprehensive Plan (RCP) to implement and promote policy objectives of the Regional Council and to assist outside parties in working within regional plans. The Solid Waste chapter of the RCP advocates conversion

technologies as one way to reduce non-recyclable solid wastes that would otherwise be sent to landfills.

SCAG strongly urges that the Integrated Waste Management Board use the opportunity provided by the formulation of this report to encourage the widespread adoption of conversion technologies and assigning full diversion credit in those cases where non-recyclable solid waste is actually diverted away from local landfills.

Thank you for your consideration of these comments. If you have any questions about the comments, please contact Alan Thompson, Senior Regional Planner, on the SCAG staff at 213-236-1940.

Sincerely,

Mark Pisano
Executive Director