



EL DORADO SOLID WASTE ADVISORY COMMITTEE



September 14, 2015

Greg Stanton, REHS
Director
Environmental Management Division
Community Development Agency
El Dorado County
2850 Fairlane Court, Building "C"
Placerville, CA 95667

Dear Director Stanton:

The El Dorado County Solid Waste Advisory Committee (EDSWAC) was established in 1990 pursuant to AB 939, the California Integrated Waste Management Act. Responsibilities of EDSWAC include: identify solid, liquid, and hazardous waste issues of a countywide or regional concern; assist with the coordination and continued development of source reduction and recycling programs; determine the need for solid waste collection systems, processing facilities, and marketing strategies that can serve more than one local jurisdiction within this region; and prepare, maintain, and update the El Dorado County Integrated Waste Management Plan (CIWMP).

EDSWAC was instrumental in having the El Dorado County Siting Element, Source Reduction and Recycling Element, Household Hazardous Waste Element, Non-Disposal Facility Element, and Summary Plan approved by the California Integrated Waste Management Board. The Summary Plan incorporated the other Elements by reference. The California Department of Resources Recycling and Recovery (CalRecycle) requires jurisdictions to review their Summary Plan every 5 years. El Dorado County's Five-Year CIWMP review is due November 15, 2015.

On July 13, 2015, El Dorado County Community Development Agency Environmental Management Division Staff provided EDSWAC with the Five-Year CIWMP Report and supporting documentation. EDSWAC was asked to review the report and supporting documentation and send questions and comments back to staff.

On behalf of EDSWAC, I would like to notify you that we have completed the review of the Five-Year CIWMP Report.

We have reviewed the following planning documents for the City of Placerville, City of South Lake Tahoe, and the Unincorporated El Dorado County:

Countywide Integrated Waste Management Summary Plan which includes the following by reference:

1. Household Hazardous Waste Element
2. Non-disposal Facility Element

3. Siting Element
4. Source Reduction and Recycling Element

EDSWAC also reviewed the 2009 through 2013 Annual Report Summaries for Unincorporated El Dorado County.

Upon review of the aforementioned documents and reports, EDSWAC finds that all jurisdictions are meeting or exceeding their per capita disposal rate and are working in good faith to implement programs identified in the Summary Plan and subsequent annual updates. The County of El Dorado has met all regulatory requirements provided in the Five-Year CWIMP Report prepared by County staff. Therefore, EDSWAC concludes that the current CIWMP is adequate for meeting the State of California's mandated 50% diversion requirement under AB939 and does not require revision.

As you are aware, in January 2012 the County Board of Supervisors adopted a "Solid Waste Management Plan" (SWMP). The SWMP provides the County with a strategic roadmap through the year 2040 to use in planning for: coordinated, countywide, and jurisdiction cooperation; initiating new or enhancing existing solid waste programs and services; developing new and enhanced solid waste facility infrastructure; and maintaining solid waste flow control. The SWMP was designed to assist the County in reaching its 75% landfill diversion goal by 2020 in the most cost-effective manner. With all due respect and consideration of the State's CIWMP requirement, EDSWAC believes that the County's SWMP will help move the County forward more effectively to meet both the County and State's 75% diversion goal than the five-year CIWMP review process and annual updates.

The State's current regulatory model includes the annual update of twenty year old solid waste planning documents through the annual report process, as well as the five-year CIWMP review process. It is the opinion of EDSWAC that this approach is cumbersome, inefficient, and not very effective. EDSWAC respectfully recommends that CalRecycle update applicable sections of the Public Resource Code and California Code of Regulations to require jurisdictions to develop current, comprehensive and integrated solid waste planning documents in order to more effectively move all of California toward achieving the goal of 75% landfill diversion by 2020.

Furthermore, since CalRecycle has changed the methodology for measuring diversion from percent to pounds per person per day (PPD), jurisdictions are no longer able to determine progress toward meeting the State's 75% diversion goal. EDSWAC respectfully recommends that CalRecycle provide a PPD target disposal number equivalent to 75% diversion for each respective jurisdiction.

Sincerely,


Catherine Dickson Schwarzbach, Ed.D.
Chair
El Dorado County Solid Waste Advisory Committee