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SOLID WASTE ASSOCIATION
of North America

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February 24, 2005

The Honorable Rosario Marin
California Integrated Waste Management Board
P.O. Box 4025
Sacramento, CA 95812-4025

RE: AB 939 Diversion Compliance System

Dear Chairwoman Marin:

The Solid Waste Association of North America (SWANA) is composed of approximately 7000 public and private sector solid waste management professionals throughout North America dedicated to the development and enhancement of environmentally and economically sound practices and policies for the integrated management of municipal solid waste. There are approximately 900 members of SWANA in California.

The California Chapters of SWANA value the Waste Board's efforts on improving the AB 939 Diversion Compliance System and have previously commented on how further action is necessary (November 16, 2004 letter attached).

At this time, we would like to further reiterate the following arguments:

- ***The Disposal Reporting System (DRS) and mathematical system currently being developed by the Waste Board to determine compliance will be ineffective in metropolitan areas of the state.***
- ***The implementation of a diversion program should be the sole requirement used for measuring compliance with AB 939 waste reduction mandates.***
- ***The Waste Board must take a leadership role in working with local governments to formulate, prepare, and in concert with the Legislature, introduce an amendment to AB 939, where local compliance is measured solely on the implementation of diversion programs.***

The California Chapters of SWANA greatly appreciate the opportunity to submit comments on this essential topic and we look forward to working with you and your colleagues in the near future. Thank you for your consideration of our position.

Sincerely,

Yvette Gómez Agredano
Legislative Advocate
California Chapters of SWANA

cc: Other Members, CIWMB
Will Dickinson, Chair, SWANA Legislative Task Force
Mark Urquhart, Secretary, SWANA Legislative Task Force