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March 17, 2017

Scott Smithline
Director, CalRecycle
1001 I Street
Sacramento, CA 95812
Submission via email to SLCP.Organics@calrecycle.ca.gov

**RE: SB 1383 Short-Lived Climate Pollutants: Organic Waste Methane Emissions Reduction
COMMENT LETTER**

Dear Director Smithline:

The League of California Cities writes to provide initial comment on the implementation of SB 1383 (Lara), which established an ambitious disposal reduction mandate to reduce organic waste 50 percent below 2014 levels by 2020 and 75 percent by 2025. We appreciate the stakeholder process CalRecycle is undertaking, which provides us the ability to weigh in on the concept paper that was released in February.

The League of California Cities continues to support a robust waste management system that complies with California's climate goals. We further support reasonable and achievable goals in removing short-lived climate pollutants, including methane, from landfills. While we expect to provide additional comments once organic waste diversion program details are proposed, we respectfully submit the following initial comments:

Organic Waste Collection Services: Should a proposal be made to require local jurisdictions collect organic waste, the League requests the method of collection be left to the local agency. As localities vary in size, density, and other factors, the League believes that local governments should retain the flexibility to determine the best approach for collection systems. In some regions, these discussions are already underway and local governments need the ability to work with their local communities and waste haulers to determine the most effective and efficient collection method. These new organic waste diversion programs will also take time to implement. To that end, the League requests that any new program be implemented using realistic timelines.

Infrastructure Capacity and Planning: Many cities have expressed concern over an ability to comply with organic waste diversion requirements due to a lack of waste disposal infrastructure. Due to complex factors including costs, there is an uneven distribution of waste disposal infrastructure across the state. Moreover, where the infrastructure does exist, capacity is limited. Sufficient infrastructure is necessary to ensure organic waste is diverted from landfills.

Funding: Lack of sufficient funds continues to be among the major challenges local governments face in the effort to implement new organic waste diversion programs. The League would like to continue to work with the Air Resources Board, CalRecycle and others to address the need for substantial public sector funding. For example, "Cap-and-Trade" proceeds could be

used to help off-set the costs in developing organic recycling infrastructure, or reform of the state's solid waste disposal fee (commonly referred to as the 'tipping fee') could ensure monies are available from ratepayers to develop and maintain organics recycling infrastructure.

Reporting: Local agencies already report to the state on measures similar to those that may be contemplated by this regulatory process through the Electronic Annual Report (EAR). To ensure continuity and efficiency, we believe any new reporting requirements should be added to the existing EAR.

Compliance and Enforcement: New organic waste diversion programs will take time to develop, work with stakeholders, and ultimately implement. The League urges consideration of these realities through setting realistic timelines for compliance purposes. Additionally, the League believes those jurisdictions that have made a good faith effort to comply with programmatic requirements should not be subject to enforcement penalties. When developing compliance and enforcement mechanisms, we urge careful consideration of the differences among local jurisdictions, as well as the variety of community stakeholders, and infrastructure challenges a local jurisdiction may face.

The League appreciates the inclusive stakeholder process CalRecycle has begun and we look forwards to continued conversations and opportunities to comment on specific proposals. If you have any questions regarding these comments, please contact me at (916) 658-8250.

Sincerely,



Erin Evans-Fudem
Legislative Representative
League of California Cities