

League of California Cities
California State Association of Counties
Rural Counties Environmental Services Joint Powers Authority
California Refuse Recycling Council Northern District
California Refuse Recycling Council Southern District
Waste Management
Recology
Waste Connections, Inc.
SWANA California Chapter's Legislative Task Force
Sanitation Districts of Los Angeles County
California Waste and Recycling Association
Athens Services
Recycling and Waste Reduction Division of Santa Clara County
Western Placer Waste Management Authority

June 27, 2019

Gwen Huff
Materials Management and Local Assistance Division
California Department of Resources Recycling and Recovery
P.O. Box 4025
Sacramento, CA 95812

RE: Request for Comment Period Extension on the Short-Lived Climate Pollutants (SLCP): Organic Waste Reductions Proposed Regulation Text Second Formal Draft

Dear Ms. Huff:

On behalf of the above local governments, associations, and companies, we write to formally request an extension of the current comment period on the Short-lived Climate Pollutants (SLCP): Organic Waste Reductions Proposed Regulation Text Second Formal Draft (Second Draft), released June 18, 2019, from 15 days to 45 days. Our organizations are largely responsible for the existing framework, programs, and funding mechanisms that comprise our organic waste infrastructure in California and will be collectively responsible for achieving the proposed mandates under these regulations.

The Second Draft contains significant changes to the initial draft of the SLCP regulations that will take time for the numerous stakeholders to properly analyze. The 165-page document contains changes on well over three quarters of the pages, including replacement of some entire sections, and even the smallest changes could have profound consequences for interested parties. Sufficient time to review and comment on these changes is vital so that we can analyze how the new language compares to the original proposal and evaluate implementation of the changes.

Ms. Gwen Huff
Request for Comment Period Extension
June 27, 2019
Page 2

We also feel it is imperative to conduct a longer comment period in order to hold at least one more public workshop so that staff can discuss the changes with stakeholders. We believe the interaction between staff and stakeholders for this complex rulemaking continues to be invaluable, and while the June 18th workshop was appreciated, another public workshop after stakeholders have had time to digest the changes will be incredibly important. We also believe that an extended comment period will not negatively impact CalRecycle's implementation deadlines and will only result in a better all-around final product.

Our organizations appreciate the effort that CalRecycle staff has spent on the proposed Second Draft and the consideration of stakeholder comments to make changes to the initial draft. We also appreciate the outreach efforts and early stakeholder involvement that CalRecycle has provided and hope we can continue to work collaboratively to find a reasonable and responsible way to move forward in meeting our goals.

Sincerely,



Derek Dolfie
Legislative Representative
League of California Cities



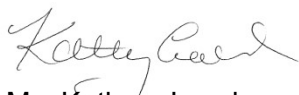
Cara Martinson
Senior Legislative Representative
California State Association of Counties



Staci Heaton
Program Manager
Rural Counties ESJPA



Veronica Pardo
Regulatory Affairs Director
California Refuse Recycling Council
Northern District



Ms. Kathryn Lynch
Regulatory Affairs
California Refuse Recycling Council
Southern District



Alex Oseguera
Director of Government Affairs
Waste Management



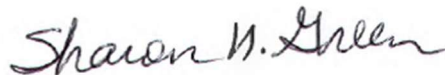
Eric Potashner
Vice President & Sr. Director of Strategic Affairs
Recology



Eddie Westmoreland
Western Region Vice President of
Governmental Affairs
Waste Connections, Inc.



Eric Zetz
Chair
SWANA California Chapter's
Legislative Task Force



Sharon N. Green
Legislative & Regulatory Liaison
Sanitation Districts of Los Angeles County



Gideon Kracov
General Counsel
California Waste & Recycling Association



Gary Clifford
Executive Vice President
Athens Services



Susan Landry
Chair
Recycling and Waste Reduction Division
of Santa Clara County



Kevin Bell
Deputy Executive Director
Western Placer Waste Management
Authority

cc: Scott Smithline, Executive Director, CalRecycle
Hank Brady, Manager, CalRecycle



Rural Counties
Environmental Services
Joint Powers Authority
ESJPA

