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


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.
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          Cara Martinson
Legislative Representative     Senior Legislative Representative
League of California Cities     California State Association of Counties

Staci Heaton          Veronica Pardo
Program Manager     Regulatory Affairs Director
Rural Counties ESJPA     California Refuse Recycling Council
Northern District

Ms. Kathryn Lynch          Alex Oseguera
Regulatory Affairs     Director of Government Affairs
California Refuse Recycling Council     Waste Management
Southern District
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Western Region Vice President of Governmental Affairs
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Chair
SWANA California Chapter’s Legislative Task Force

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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