

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.

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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 18<sup>th</sup> 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



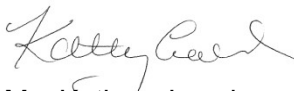
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Alex Oseguera  
Director of Government Affairs  
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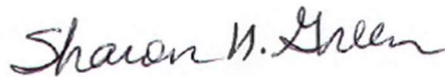
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Western Placer Waste Management  
Authority

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



**Rural Counties**  
Environmental Services  
Joint Powers Authority  
**ESJPA**

