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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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August 23, 2016

The Honorable Das Williams, Chair
Assembly Committee on Natural Resources
1020 N Street, Room 164
Sacramento, California 95814

Dear Assembly Member Williams:

**SENATE BILL 1383 (AMENDED AUGUST 19, 2016) - OPPOSE
SHORT-LIVED CLIMATE POLLUTANTS**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **opposes** Senate Bill 1383 (SB 1383), as amended August 19, 2016. SB 1383 would require the State Air Resources Board (CARB) to approve and begin implementing a strategy to significantly reduce emissions of short-lived climate pollutants. The bill would also establish targets for reducing organic waste in landfills and require the Department of Resources Recycling and Recovery (CalRecycle) to adopt regulations that achieve those targets.

The Task Force is familiar with the threat of greenhouse gas (GHG) emissions, and specifically short-lived climate pollutants such as methane, hydrofluorocarbon gases, and anthropogenic black carbon, and the resulting overall decrease of quality of life they cause for residents and the environment. The Global Warming Solutions Act of 2006 (AB 32), which required a reduction of GHG emissions to 1990 levels by 2020, as well as, the Mandatory Commercial Organics Recycling (AB 1826, Chapter 727 of the 2014 State Statutes), which required a reduction in organic waste disposal to 50 percent of the level of disposal in 2014, reinforced California's environmental leadership standing. In its first update to the AB 32 Scoping Plan, which was released in 2014, CARB indicated that the State is on track to achieve the GHG emission reduction targets. However, the legislature has yet to establish a GHG emission reduction policy beyond 2020. The Task Force is concerned SB 1383 will create overlapping policies that are inconsistent with what the legislature has established pursuant to AB 32 and AB 1826, while authorizing CARB to approve and begin implementing a strategy, along with requiring CalRecycle to adopt regulations that achieve targets for increased organic waste diversion, without a legislative vetting process.

The Task Force is supportive of efforts to reduce GHG emissions. The first update to the Scoping Plan identifies short-lived climate pollutants as already being regulated by CARB. It would be counterproductive to authorize CARB to regulate specific GHGs and CalRecycle to increase organic waste diversion on a separate metric while they measure these same elements pursuant to AB 32 and AB 1826. This will create confusion and frustration for the industry with the possibility that reductions pursuant to SB 1383 will not count towards reductions related to AB 32.

Moreover, authorizing CARB to approve and implement a strategy, along with requiring CalRecycle to adopt regulations that achieve targets for increased organic waste diversion, with no legislative accountability is a dangerous precedent. While the Task Force believes CARB has good intentions for the State, implementing strategies, and regulations that have not been vetted for efficacy, business climate, cost, among other considerations, could amount to unintended consequences for the State's business climate while providing little to no benefit for residents.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

For the foregoing reasons, the Task Force **opposes** SB 1383. Should you have any questions regarding this matter, please contact Mr. Mike Mohajer, a Member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste management Task Force and
Council Member, City of Rosemead

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The Honorable Das Williams

August 23, 2016

Page 3

cc: Senator Ricardo Lara
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Assembly Committee on Natural Resources, Chief Consultant, Lawrence
Lingbloom
California State Association of Counties
League of California Cities, Los Angeles Division
Each member of the Los Angeles County Board of Supervisors
Sachi A. Hamai, Los Angeles County Chief Executive Officer
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Gateway Cities Council of Governments
Westside Cities Council of Governments
Each City Mayor and City Manager in the County of Los Angeles
Each Member of the Los Angeles County Integrated Waste Management Task Force