



January 16, 2017

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The Honorable Mary D. Nichols, Chair  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

**Re: Comments on Revised Proposed Short-Lived Climate Pollutant Reduction Strategy**

Dear Chair Nichols:

The California State Association of Counties (CSAC) appreciates the opportunity to comment on the revised proposed Short-Lived Climate Pollutant Reduction Strategy. CSAC is an association that represents county government before the Legislature, administrative agencies and the federal government. Representing all 58 of California's counties, CSAC places a strong emphasis on educating the public about the value and need for county programs and services critical for healthy communities.

Counties support reasonable and achievable goals in removing short-lived climate pollutants from landfills. We appreciate the opportunity to provide feedback on the proposed Short-Lived Climate Pollutant Reduction Strategy, and we would like to offer the following comments.

### **Waste Reduction**

Counties support improved efforts to reduce short-lived climate pollutants. However, implementation must be appropriately supported in order to achieve desired outcomes, and state funding is a critical component to assist with building the necessary infrastructure to support implementation. The infrastructure to meet state goals and mandates is not expanding to accommodate organics diversion targets and remains woefully inadequate. CSAC is committed to partnering with the state on this issue, but before any additional diversion requirements can be achieved from this sector, we must address critical funding and infrastructure needs. CSAC stands ready to work with the state and other stakeholders to develop a reasonable state fee structure that aids in infrastructure development. This effort is a critical component of meeting short-lived climate pollutant goals.

Another challenge to building infrastructure is the lengthy timeline required for a composting or Anaerobic Digestion (AD) facility to be operational. "Siting and permitting" is terminology applied to the process by which additional infrastructure is established. For solid waste organics diversion infrastructure, this process is not just the formal process to apply for and issue permits but includes other aspects which may overlap or be required prior to initiating the permitting process. These aspects include design, feasibility study for the new facility or expanded existing site, the Request for Proposal (RFP) process, establishing financing/rate structures and franchise agreements, identifying or expanding collection and processing/transfer capability, final design, and construction. Most

importantly, siting and permitting does not move forward without local community support. To help local governments be successful in achieving our organic diversion goals, significant revisions to existing state requirements for siting and permitting organics processing/recycling facilities are necessary. In addition, there is a need for increases in market support for compost and renewable fuels.

CSAC stands ready to work with the Administration and the relevant state agencies to help develop reasonable and effective solutions on this issue. Thank you for the opportunity to comment on the proposed draft. Should you have any questions or comments, please feel free to contact me at [cmartinson@counites.org](mailto:cmartinson@counites.org), or 916-327-7500, ext. 504.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cara B. Martinson', with a stylized, flowing script.

Cara B. Martinson  
CSAC Legislative Representative