



WESTERN PLACER
WASTE MANAGEMENT AUTHORITY

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January 12, 2017

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Submitted Electronically via www.arb.ca.gov/lispub/comm/bclist.php

**RE: REVISED PROPOSED SHORT-LIVED CLIMATE POLLUTANT STRATEGY
COMMENTS**

California Air Resources Board:

The WPWMA appreciates the opportunity to comment on the California Air Resources Board's (ARB) Revised Proposed Short-Lived Climate Pollutant Reduction Strategy (SLCP) released November 28, 2016. The WPWMA is a joint powers authority comprised of Placer County and the cities of Roseville, Rocklin and Lincoln. The WPWMA provides recycling and waste disposal services to these communities as well as the cities of Auburn and Colfax and the Town of Loomis.

The WPWMA operates a Materials Recovery Facility (MRF) designed to separate, process and market recyclable materials removed from the mixed solid waste stream. Residuals are disposed at the WPWMA's Western Regional Sanitary Landfill which is collocated with the MRF. Green waste is processed and composted at the WPWMA's composting facility, also collocated with the MRF.

The WPWMA respectfully submits the following comments on the SLCP:

1. Solid Waste Tipping Fee

The SLCP notes on page 31 that "achieving significant reductions in SLCPs will require substantial investments..." and identifies the Greenhouse Gas Reduction Fund, an increase to the waste disposal tipping fee and the establishment of a generator fee as potential new funding sources. The WPWMA strives to maintain a reliable and consistent rate structure and strongly opposes the inclusion of waste disposal tipping fees and generator fee revenues in the SLCP for two significant reasons:

- a. The Legislature Has Not Yet Acted – The WPWMA's legislative consulting firm (Shaw/Yoder/Antwih, SYA) has suggested that the tip fee increase and establishment of a generator fee would require the passage of legislation with a 2/3 supermajority vote of the legislature, which has heretofore been politically infeasible. SYA believes that members of the legislature would not prioritize tip fee enactment if they were to vote as a

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block to increase taxes, especially considering ongoing discussions on transportation infrastructure and the passage of Cap and Trade legislation with 2/3 supermajority votes. Additionally, SYA noted that prior versions of this legislation have not clearly programmed the funding for purposes consistent with the SLCP, that discretion was left to CalRecycle, and because the money would technically be a tax, it could be swept by the legislature in lean budget times. As a result, SYA has recommended that the WPWMA take the position that these funding mechanisms should not be included in the SLCP unless and until they are established by the legislature.

- b. Disposal-Based Funding to Drive Diversion – The WPWMA opposes this approach because the funding mechanism targets landfills to disproportionately finance statewide programs from which they will not benefit. Once statewide diversion goals are reached, the funding mechanism may not be able to sustain recycling and organics diversion programs and infrastructure which would result in the need to regularly increase the disposal fee as disposed quantities decrease.

2. Definition of “Organics”

The WPWMA believes that the SLCP needs to more clearly define what is included, and excluded, from the definition of “organic” material; specifically, whether the definition includes paper in addition to food waste and green waste. The SLCP should also specify whether biosolids and other organics treated in a digester and stabilized will be considered an “organic” material necessitating diversion from landfills.

3. Markets for Diverted Waste Streams

The WPWMA believes that the SLCP should reflect the importance of market development and sustainability. Long-term, economically viable material markets will be essential for the WPWMA and other solid waste facilities modifying programs and infrastructure to divert organic material from landfills in order to offset the cost of diversion. The WPWMA strongly encourages the ARB to consider this critical issue in more detail in the SLCP..

We appreciate your consideration of these comments. Should you have any questions, please contact me at eoddo@placer.ca.gov or (916) 543-3984.

Sincerely,



Eric Oddo, PE
Environmental Engineering Program Manager