



WESTERN PLACER
WASTE MANAGEMENT AUTHORITY

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December 12, 2016

California Air Resources Board

SP2030DISC-DEC16-WS

Submitted via www.arb.ca.gov/cc/scopingplan/scopingplan.htm

RE: DRAFT 2030 TARGET SCOPING PLAN UPDATE COMMENTS

CA Air Resources Board:

The Western Placer Waste Management Authority (WPWMA) appreciates the opportunity to comment on the Draft 2030 Target Scoping Plan Update published on December 2, 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. Greenwaste is processed and composted at the MRF's 75,000 cubic yard capacity compost facility.

The WPWMA respectfully submits the following comments on Section E of the draft Plan:

1. The Draft Scoping Plan identifies substantial landfill tip fee increases and new generator fees as a sustainable State funding source for development of waste management infrastructure, programs and incentives. The WPWMA strongly opposes the inclusion of this funding method in the Draft 2030 Target Scoping Plan for two significant reasons:
 - a. The Legislature Has Not Yet Acted – 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. There is no reason to believe that members of the legislature would prioritize tip fee enactment if they were to vote as a block to increase taxes, especially considering current discussions on transportation infrastructure and the passage of Cap and Trade legislation with 2/3 supermajority votes. Additionally, prior versions of this legislation have not clearly programmed the funding for purposes consistent with the Draft 2030 Target Scoping Plan. 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. Tip fee and generator fee funding

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mechanisms should not be included in the Draft 2030 Target Scoping Plan unless and until it is established by the legislature.

- b. Disposal-Based Funding to Drive Diversion – The WPWMA opposes this approach because the funding mechanism unfairly targets landfills to disproportionately finance statewide programs from which they will not benefit. Once diversion goals are reached, a tip fee funding mechanism may not be able to sustain recycling and organics diversion programs and infrastructure.
2. The Draft 2030 Target Scoping Plan identifies an organic waste diversion target of 50 percent from landfills by 2020, but also recognizes that the authority to implement regulations to achieve that goal doesn't occur until 2022. It appears that the Draft 2030 Target Scoping Plan anticipates using existing legislative authority to achieve this 2020 mandate, but lacks details and estimates demonstrating feasibility.
 3. The goal to “maximize recycling and diversion from landfills” should include State support of recycling markets and efforts to expand existing markets and develop new markets.
 4. The plan calls for building on established waste reduction mandates (AB 1594, AB 1826, AB 876, SB 605 and SB 1383) to increase organics diversion from landfills. It seems premature to establish additional organics diversion regulations until existing and proposed regulations have been adequately implemented and evaluated.

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
Environmental Engineering Program Manager