



CITY OF CARSON

April 27, 2021

The Honorable John Laird
State Capitol, Room 4040
Sacramento, CA 95814

**RE: SUPPORT IN CONCEPT – SENATE BILL 619 (LAIRD) AS AMENDED ON APRIL 13, 2021
– ORGANIC WASTE: REDUCTION REGULATIONS**

Dear Senator Laird:

The City of Carson is pleased to support in concept your Senate Bill 619 (SB 619), as amended April 13, 2021.

If enacted, the proposed legislation would require the Department of Resources Recycling and Recovery (CalRecycle) until January 1, 2023, to only impose a penalty on a local jurisdiction and only allow a penalty to accrue for a violation of the regulations if the local jurisdiction did not make a reasonable effort, as determined by CalRecycle, to comply with the Senate Bill 1383 (Lara, 2016) [SB 1383] regulations.

Using a good faith effort approach to enforcement until January 1, 2023, would provide local jurisdictions with desperately needed flexibility while extending the deadlines would allow local jurisdictions to further their efforts toward achieving the Statewide organic waste recycling targets and climate goals. The existing timeline does not give local jurisdictions adequate time to create effective programs and navigate permit and ordinance processes, while also struggling with residents, small businesses, and municipal budgets severely impacted by the COVID-19 pandemic. It is imperative to provide adequate time and resources for local jurisdictions to design and implement thoughtful and successful organic waste recycling programs.

Existing law and CalRecycle's regulations; however, do not recognize the significant challenges created by a lack of infrastructure and the COVID-19 pandemic. As such, the City of Carson respectfully requests that the bill also be amended to include the following provisions:

1. Funding for required infrastructure.

- a. Lack of necessary organic waste infrastructure is a significant challenge for Southern California. Best estimates are that over \$1 billion of new infrastructure is needed just in Los Angeles County, while to date only \$175 million in cap-and-trade funds has been allocated to CalRecycle since 2014, and no funding is proposed in the upcoming fiscal year.
 - b. Passing local ordinances with fines on local businesses and increasing solid waste collection rates in the midst of the COVID-19 emergency and subsequent economic recovery period will be very challenging.
2. Reduce the time and cost associated with solid waste facility permitting and environmental reviews process for new infrastructure.
 3. Delay the requirement to pass a local enforcement ordinance to allow additional time for post-pandemic economic recovery and education and outreach surrounding new organic waste programs before penalties are imposed on residents and businesses. Also, allow for development and implementation of a phase-in procurement requirements, possibly three years, rather than the aggressive requirement currently mandated by the SB 1383 adopted regulation.
 4. Market incentives for the development of new infrastructure, including incentives to include Renewable Natural Gas as a part of the transition to electrification.
 5. Support for additional organic waste diversion options, including clear permitting tiers and sample programmatic CEQA documents for biomass conversion as well as funding to study high diversion capabilities and emissions reductions of other alternative technologies.

We appreciate the flexibility the current language is seeking to provide and hope that your proposed legislation will provide additional support to jurisdictions struggling to comply with the short deadlines and statewide goals of SB 1383. Additionally, because the City of Carson is currently home to a significant facility for processing organic waste, we are further concerned that the regulations surrounding organic waste processing are designed, managed, and implemented with utmost care and that such regulations balance the needs of all constituents.

Based on the foregoing, the City of Carson strongly Supports In Concept SB 619 and is looking forward to working with you and/or your staff to achieve this endeavor.

Sincerely,

Lula Davis-Holmes, Mayor

Jim Dear, Mayor Pro Tem

Jawane Hilton, Councilmember

Cedric L. Hicks, Sr., Councilmember

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