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August 16, 2018

Mr. Scott Smithline, Director
California Department of Resources Recycling and Recovery (CalRecycle)
PO Box 4025
Sacramento, CA 95812-4025

VIA EMAIL: SLCP.Organics@calrecycle.gov

RE: CalRecycle proposed regulations under SB1383

Dear Mr. Smithline:

On behalf of the Cities Association of Santa Clara County, an association of the 15 cities of Santa Clara County, we write to express our concern regarding the current draft of SB 1383 Regulations and wish to provide comments.

The proposed regulations:

- Fail to acknowledge variations in climate, organics generation, markets, and financial resources and block cities from designing diversion programs tailored to match those local variations.
- Require resources that exceed benefits and the propose mandatory process steps are not directly related to the desired outcome
- Are punitive to residents and businesses, which ultimately weakens the ambitious goals of SB 1383
- Dictate that local jurisdictions procure specified amounts of recycled organic waste products and use an inappropriate metric for quantifying the amount required which is flawed. Why not simply require jurisdictions' purchases of landscape material include recycled content?

The Cities Association of Santa Clara County has long been on the forefront of advocating and creating policies for our communities that champion the environment. We are supportive of efforts for recycling and waste reduction but feel the draft in its current form does not achieve the goal of organics diversion.

Thank you for taking the time to consider our comments.

Sincerely,

Rod Sinks
President
Vice Mayor, City of Cupertino

Marico Sayoc
Legislative Action Committee Chair
Council Member, Town of Los Gatos

