



**MEMORANDUM**  
**DEPARTMENT OF PUBLIC WORKS**  
**ENVIRONMENTAL ENGINEERING DIVISION**  
County of Placer

TO: Board of Supervisors DATE: September 10, 2019  
FROM: Ken Grehm, Director of Public Works  
By: Chris Hanson, Senior Planner  
SUBJECT: Environmental Engineering / Draft Program Environmental Impact Report for the Adoption of Regulations for Short-Lived Climate Pollutants: Organic Waste Methane Emission Reduction (SCH #2018122023)

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**ACTION REQUESTED**

Authorize the Director of Public Works, or designee, to sign a letter commenting on the Draft Program Environmental Impact Report for the Statewide Adoption of Regulations for Short-Lived Climate Pollutants: Organic Waste Methane Emission Reduction.

**BACKGROUND**

SB 1383 (2016), among other things, establishes a target of 50% reduction in the statewide disposal of organic waste from the 2014 level by 2020, a 75% reduction by 2025, and recovery of 20% of the edible food currently disposed by 2025. It also requires CalRecycle to adopt regulations to achieve the organic waste reduction targets. CalRecycle began the formal rulemaking process in January 2019.

The proposed regulations require all generators of organic waste to recycle. Jurisdictions must adopt ordinances, implement enforcement (including penalties on residents and businesses for noncompliance), provide organic waste collection services (including residential food waste), implement a countywide edible food collection and distribution program, procure prescribed amounts of recycled organic products, ensure organic waste processing capacity, and conduct extensive recordkeeping and reporting to the state. Organic waste processing facilities must achieve organic waste diversion targets (50% by 2022 and 75% by 2025) and all solid waste facilities must perform regular waste characterization studies.

Staff believes that the extensive and prescriptive nature of the regulations will result in significant cost impacts to numerous Placer County (County) departments, solid waste facilities, residents and businesses. In addition, staff is concerned with the environmental impacts associated with implementation which could conflict with local air quality and sustainability plans. The expansion of food waste collection would increase the bear-human impacts already experienced in our County. Staff feels that a more locally controlled approach could achieve the regulation's objectives with fewer cost and environmental impacts.

On July 30, 2019, CalRecycle released a Draft Program Environmental Impact Report (EIR) for the Statewide Adoption of Regulations for Short-Lived Climate Pollutants: Organic Waste Methane Emission Reduction. The public review and comment period ends September 13, 2019. Due to the cost, programmatic, and environmental impacts to our County and its residents and businesses, staff has been actively engaged in the regulatory process. To continue in this vein, staff recommends your Board authorize the Director of Public Works, or designee, to sign a comment letter on the Draft EIR consistent with the issues identified above.

**ENVIRONMENTAL IMPACT**

The proposed action does not constitute a "Project" under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines sections 15378(a) and (b)(5) because it is an administrative action that does not result in any direct or physical change in the environment and is therefore exempt from environmental review.

**FISCAL IMPACT**

There is no fiscal impact associated with this Action.

**ATTACHMENTS**

None

