



July 11, 2022

Steven Lederer
County of Napa-UVWMA
1195 3rd Street Ste. 101
Napa, CA 94559

RE: Notice of Mandatory Commercial Organics Recycling Program Implementation Gaps

Dear Mr. Lederer:

The Department of Resources Recycling and Recovery (CalRecycle) has determined the County of Napa-UVWMA is deficient in implementing and complying with Mandatory Commercial Organics Recycling (MORE), also known as AB 1826 (Statutes of 2014). As a result, CalRecycle is requesting the County submit an action plan by July 29, 2022. CalRecycle Local Assistance and Market Development (LAMD) staff discussed this with Amanda Griffis on May 5, 2022.

The following is a summary of program deficiencies needing to be addressed:

1. Mandatory Commercial Organics Recycling
 - A. The County implemented a MORE program; however, based on monitoring data, there is still a high level of noncompliance.

The County's action plan will need to address how the remaining regulated commercial businesses will reach compliance through collection service, self-hauling, or waiver no later than December 30, 2022. CalRecycle recognizes the County is also working diligently to implement the SB 1383 regulations and fully implementing mandatory commercial services for regulated businesses subject to MORE supports the County's implementation of the new regulations.

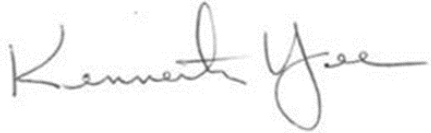
CalRecycle staff will review the County's submitted Plan and assess its adequacy. If there are any issues, CalRecycle staff will work with County staff to finalize the Plan for the August 16, 2022 public meeting.

1. If the County submits a Plan to adequately address the gaps as indicated in the public agenda item, LAMD staff will monitor implementation of Plan activities after the public meeting to ensure program gaps are fully addressed.
2. If the gaps are not adequately addressed, or a Plan is not submitted to address the program implementation gaps, this information will be presented at the public

meeting and the County will be notified and referred to the CalRecycle Enforcement Branch for additional compliance review.

We look forward to working with the County of Napa-UVWMA to address the program gaps. Should you have any questions regarding this letter, please contact Brianna Lara at Brianna.Lara@calrecycle.ca.gov (916) 323-0075, or her supervisor Karla Miller at Karla.Miller@calrecycle.ca.gov (916)327-8804.

Sincerely,

A handwritten signature in black ink that reads "Kenneth Yee". The signature is fluid and cursive, with the first name "Kenneth" and the last name "Yee" clearly distinguishable.

Kenneth Yee
Section Manager
Local Assistance and Market Development