



**City of Brisbane**  
Department of Public Works  
50 Park Place  
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The Honorable Gavin Newsom  
Governor of California

The Honorable Pedro Nava  
Chair of the Little Hoover Commission  
and members of the Commission

The Honorable Toni Atkins  
President pro Tempore of the Senate  
and members of the Senate

The Honorable Brian Jones  
Senate Minority Leader

The Honorable Robert Rivas  
Speaker of the Assembly  
and members of the Assembly

The Honorable James Gallagher  
Assembly Minority Leader

**Subject: Response to Little Hoover Commission Report #274 "Reducing California's Landfill Methane Emissions: SB 1383 Implementation"**

Dear Governor, Members of the Legislature, and Members of the Little Hoover Commission:

The City of Brisbane Open Space and Ecology Committee (OSEC) and Public Works staff implementing SB 1383 have reviewed the Little Hoover Commission (LHC) recommendation to pause SB 1383; notwithstanding our concurrence with many of the report's recommendations, we disagree with the overarching conclusion to pause SB 1383's implementation.

Brisbane has been working hard to implement SB 1383, including beginning our enforcement actions in January 2023, a full year earlier than required. While we agree that SB 1383 presently has many challenges and flaws, taking a pause when so much time, expense and effort has already been expended, and while the climate crisis demonstrates again and again that it waits for no one, would be a mistake. Rather than pausing implementation, we simply recommend that enforcement actions against jurisdictions be put on hold while the report's other recommendations are implemented. In particular, increased funding and support for local jurisdictions and a public education campaign are vital to long-term success of waste reduction and diversion efforts. Statewide efforts to expand infrastructure and market opportunities for recycled waste, organic or otherwise, are essential to meeting state climate and environmental goals.

Brisbane is grateful for the partnership with the franchise waste hauler for most of our jurisdiction, South San Francisco Scavenger Company, and their on-site anaerobic digester. This forward-looking investment allows local organic waste to be turned into Renewable Natural Gas, powering the fleet of collection trucks and meeting a significant portion of local procurement requirements under SB 1383. We support state zero-emission vehicles and net-zero emissions goals but believe that we cannot solve our waste challenges without putting these materials back into productive use, and therefore encourage review of conflicting rules in a way that recognizes the value of this type of closed-loop system.

We agree this is a critical opportunity to advance California's fight against climate change and encourage pausing enforcement actions against jurisdictions while continuing to implement SB 1383 and the recommendations in the LHC report.

Sincerely,

Adrienne Etherton, Sustainability Manager  
City of Brisbane Public Works Department

Erin Becker, Chair  
Open Space and Ecology Committee

Cc: Brisbane City Council; Assemblymember Diane Papan; Senator Josh Becker