Five-Year CIWMP/RAIWMP Review Report Template

Public Resources Code (PRC) Sections 41770 and 41822, and Title 14, California Code of Regulations (CCR) Section 18788 require that each countywide or regional agency integrated waste management plan (CIWMP or RAIWMP), and the elements thereof, be reviewed, revised if necessary, and submitted to the Department of Resources Recycling and Recovery (CalRecycle) every five years. CalRecycle developed this Five-Year CIWMP/RAIWMP Review Report template to streamline the Five-Year CIWMP/RAIWMP review, reporting, and approval process.

A county or regional agency may use this template to document its compliance with these regulatory review and reporting requirements and as a tool in its review, including obtaining Local Task Force (LTF) comments on areas of the CIWMP or RAIWMP that need revision, if any. This template also can be finalized based on these comments and submitted to CalRecycle as the county or regional agency’s Five-Year CIWMP or RAIWMP Review Report.

The Five-Year CIWMP/RAIWMP Review Report Template Instructions describe each section and provide general guidelines with respect to preparing the report. Completed and signed reports should be submitted to the CalRecycle's Local Assistance & Market Development (LAMD) Branch at the address below. Upon report receipt, LAMD staff may request clarification and/or additional information if the details provided in the report are not clear or are not complete. Within 90 days of receiving a complete Five-Year CIWMP/RAIWMP Review Report, LAMD staff will review the report and prepare their findings for CalRecycle consideration for approval.

If you have any questions about the Five–Year CIWMP/RAIWMP Review Report process or how to complete this template, please contact your LAMD representative at (916) 341-6199. Mail the completed and signed Five-Year CIWMP/RAIWMP Review Report to:

Dept. of Resources Recycling & Recovery  
Local Assistance & Market Development, MS-9  
P. O. Box 4025  
Sacramento, CA 95812-4025

General Instructions: Please complete Sections 1 through 7, and all other applicable subsections. Double click on shaded text/areas ( ) to select or add text.
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SECTION 2.0 BACKGROUND
This is the regional agency’s fifth Five-Year Review Report since the approval of the CIWMP.

The following changes have occurred since the approval of the regional agency’s planning documents or the last Five-Year CIWMP Review Report (whichever is most recent):

☐ Diversion goal reduction  ☑ New city (name(s) _____)
☐ New regional agency  ☐ Other _____
☑ Changes to regional agency

Additional Information (optional)

Through a re-branding process in 2018, the Sonoma County Waste Management Agency (SCWMA) became Zero Waste Sonoma (ZWS) to better reflect the identity of the JPA and differentiate the agency from the County of Sonoma. The new name also captures the regional goal of achieving zero waste by 2030. This document will refer to ZWS by its new name, Zero Waste Sonoma or ZWS.

Since the closure of Sonoma Compost in the fall of 2015, organics have been out-hauled to compost facilities in Ukiah, Novato, and Richmond. In 2015, Petaluma became the first city to collect food waste for composting. The food waste collection program expanded to include all Sonoma County cities in 2016. Zero Waste Sonoma is in negotiations to develop a compost facility in Sonoma County with Renewable Sonoma. On March 1 2017, Zero Waste Sonoma amended and restated the Joint Exercise of Powers Agreement with the County of Sonoma, a political subdivision of the State of California, the City of Cotati, the City of Cloverdale, the City of Healdsburg, the City of Petaluma, the City of Rohnert Park, the City of Santa Rosa, the City of Sebastopol, the City of Sonoma, a California municipal corporation, and the Town of Windsor. The Agency has the authority to provide the following core programs to the Members: (1) Provide for the recycling and disposal of Household Hazardous Waste from the Members’ jurisdictions (the “Household Hazardous Waste Program”); (2) provide services and programs to provide for or facilitate the diversion of organic material, including but not limited to Yard Waste and Wood Waste (the “Organic Materials Program”); (3) provide education regarding recycling, composting and other methods of waste diversion to Members and the public (the “Education Program”); and (4) conduct, prepare and submit all monitoring and reporting as a Regional Agency as required pursuant to the Integrated Waste Management Act (the “Reporting Program”).

Per an agreement between the County of Sonoma and Republic Services, a Construction and Demolition (C&D) Recycling Facility opened in June 2017 to improve operations and increase the tonnage of C&D material diverted from the landfill. After Republic Services acquired a recycling site from Industrial Carting in Santa Rosa in mid-2018, C&D volume processed at the Central Landfill increased significantly with a steady stream of material transferred from that location.

In August 2018, the Zero Waste Sonoma board directed staff to explore feasibility of accepting compostable food service-ware in the new proposed organics processing facility. The Zero Waste Task Force recruited a diverse group of individuals within the industry, forming the Compostable Products Committee, and tasked them to investigate the issue. Over the course of a year, the Committee
developed three options for the board to choose from including: 1) unlined fiber products only; 2) all BPI-Certified food service ware in a single-stream process and; 3) all BPI-Certified food service ware in a dual-stream process. The Committee could not come to a consensus and therefore did not present a recommendation; they instead presented pros and cons for each option and left the decision up to the board. The findings of this committee are included as attachment A.

ZW Resolution: The AB 939 Local Task Force (LTF), a County-created advisory group to the Board of Supervisors and Zero Waste Sonoma, created a model Zero Waste resolution that it recommends ZWS and its member jurisdictions adopt to create a Zero Waste framework throughout Sonoma County. This resolution was reviewed and approved by the Zero Waste Sonoma Board of Directors at its September 19, 2018 meeting, and Board members then recommended all member jurisdictions adopt the resolution. To date, Cloverdale, Healdsburg, Windsor, Sebastopol, Cotati, and Petaluma have adopted the model Zero Waste Resolution.

Polystyrene Model Ordinance: ZWS Board directed ZWS staff to create a model polystyrene waste reduction ordinance which was adopted September 19, 2018 as polystyrene items are common forms of litter and more environmentally friendly alternatives are prevalent. ZWS staff researched the over 100 such ordinances in California, and drafted a model ordinance largely from ordinances adopted by the Counties of Santa Clara and Santa Cruz. The main elements of the proposed model ordinance include the following:

1. Prohibition of polystyrene foam food service ware distributed by food establishments and food providers
2. Prohibition of polystyrene foam products sold by retail vendors
3. Requirement for food establishments and food providers to provide single use straws and utensils upon request only
4. Voluntary “take-out” fees for disposable service ware and credits for reusable items
5. Contract and lease language for vendors and contractors doing business with the jurisdiction.

As of September 8, 2020, the Cities of Cloverdale, Sebastopol, and Healdsburg, as well as the Town of Windsor have adopted the Model Polystyrene and Disposable Food Service Ware Ordinance. Petaluma has adopted a portion of the ordinance restricting the use and distribution of polystyrene foam only. COVID-19 has delayed adoption in the remaining jurisdictions, and it is not known if or when all ten jurisdictions will adopt. ZWS anticipates delaying the enforcement date from January 1, 2021 to January 1, 2022.

Out of the LTF, a North Bay Zero Waste Task Force formed in 2018. This group, made up of Sonoma County residents, industry professionals, and advocates, meets monthly to discuss solid waste issues, policy, and the work of local groups including Zero Waste Sonoma. The group has been instrumental in conveying Zero Waste messages to different communities, encouraging adoption of zero waste policies, and building a network of knowledge and idea sharing for Sonoma County.

Zero Waste Sonoma has been active in aligning waste diversion programs with climate action initiatives. Staff have been active in both the County’s Climate Action Committee and the Carbon Sequestration Committee. In 2018, Zero Waste Sonoma used the Waste Reduction Model (WARM) to track and report GHG emissions reductions, energy savings, and economic impacts from waste management practices such as source reduction, recycling, and diversion. For 2018, Zero Waste
Sonoma reported a reduction in GHG emissions due to recycling and composting of 303,465.17 MT CO2e. Without these practices, it is estimated that Sonoma County’s waste emissions would have been over 500,000 MT CO2e for 2018.

Zero Waste Sonoma signed an agreement with the Mattress Recycling Council to coordinate and schedule logistics for mattress collection events in conjunction with the Agency’s e-waste collection events.

In partnership with the California Product Stewardship Council and County of Sonoma, six additional safe medicine drop off locations have been installed at pharmacies throughout Sonoma County in 2020.

SECTION 3.0 LOCAL TASK FORCE REVIEW

a. In accordance with Title 14 CCR, Section 18788, the Local Task Force (LTF) reviewed each element and plan included in the CIWMP and finalized its comments

- at the 10/8/20 LTF meeting. □ electronically (fax, e-mail) □ other (Explain): ______
  - Clarification between COIWMP and long-term planning documents
  - Bringing the document together to reflect all of the annual report changes and contradictory policies due to the old policies not being removed or updated
  - Discussion of the NDFE and Siting Element in anticipation of new organics processing facility current under negotiation between ZWS and Renewable Sonoma – to be updated as facilities are nearing completion
  - Work of the North Bay Zero Waste Task Force
  - Inclusion of Compostable Products and Permitting Subcommittees’ research and findings

b. The county received the written comments from the LTF on 8/18/2020 and 10/8/2020.

c. A copy of the LTF comments

- is included above.
- was submitted to CalRecycle on ______.

SECTION 4.0 TITLE 14, CALIFORNIA CODE of REGULATIONS SECTION 18788 (3) (A) THROUGH (H)

The subsections below address not only the areas of change specified in the regulations, but also provide specific analyses regarding the continued adequacy of the planning documents in light of those changes, including a determination on any need for revision to one or more of the planning documents.

Section 4.1 Changes in Demographics in the County or Regional Agency
When preparing the CIWMP Review Report, the county or regional agency must address at least the changes in demographics.
The following resources are provided to facilitate this analysis:

1. Demographic data, including population, taxable sales, employment, and consumer price index by jurisdiction for years up to 2006, are available at: https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/AdjustmentFactors. Data for years beyond 2006 can be found on the following websites:
   - Taxable Sales: Board of Equalization
   - Employment: Employment Development Department Click on the link to Local Area Profile, select the county from the drop down menu, then click on the “View Local Area Profile” button.
   - Consumer Price Index: Department of Industrial Relations

2. The Demographic Research Unit of the California Department of Finance is designated as the single official source of demographic data for State planning and budgeting (e.g., find E-5 City/County Population and Housing Estimates under Reports and Research Papers and then Estimates).

3. The Department of Finance’s Demographic Research Unit also provides a list of State Census Data Center Network Regional Offices.
Table 1: Demographics in Cities in Sonoma County

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>2015 Population</th>
<th>2020 Population</th>
<th>Percent Changed</th>
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<tbody>
<tr>
<td>Cloverdale</td>
<td>8,889</td>
<td>9,213</td>
<td>+3.5%</td>
</tr>
<tr>
<td>Cotati</td>
<td>7,367</td>
<td>7,533</td>
<td>+2.5%</td>
</tr>
<tr>
<td>Healdsburg</td>
<td>11,740</td>
<td>12,089</td>
<td>+2.9%</td>
</tr>
<tr>
<td>Petaluma</td>
<td>60,407</td>
<td>61,873</td>
<td>+2.4%</td>
</tr>
<tr>
<td>Rohnert Park</td>
<td>41,681</td>
<td>43,069</td>
<td>+3.2%</td>
</tr>
<tr>
<td>Santa Rosa</td>
<td>174,945</td>
<td>173,628</td>
<td>-0.8%</td>
</tr>
<tr>
<td>Sebastopol</td>
<td>7,610</td>
<td>7,745</td>
<td>+1.7%</td>
</tr>
<tr>
<td>Sonoma</td>
<td>10,929</td>
<td>11,050</td>
<td>+1.1%</td>
</tr>
<tr>
<td>County of Sonoma</td>
<td>500,640</td>
<td>492,980</td>
<td>-1.5%</td>
</tr>
<tr>
<td>Windsor</td>
<td>27,771</td>
<td>28,248</td>
<td>+1.7%</td>
</tr>
</tbody>
</table>

Source: CA Department of Finance

Table 2: Employment

<table>
<thead>
<tr>
<th>Employment Factor</th>
<th>2015</th>
<th>2020</th>
<th>Percent Change</th>
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</thead>
<tbody>
<tr>
<td>Employment</td>
<td>246,200</td>
<td>224,400</td>
<td>-8.9%</td>
</tr>
<tr>
<td>Labor Force</td>
<td>258,000</td>
<td>253,600</td>
<td>-1.7%</td>
</tr>
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Source: CA Employment Development Department

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**Analysis**

Upon review of demographic changes since 1990:

☑ The demographic changes since the development of the CIWMP do not warrant a revision to any of the countywide planning documents.

The population in Sonoma County is 2015 was 500,640 and decreased to 492,980 by 2020. These factors do not appear to have drastically changed the nature of waste generated.

☐ These demographic changes since the development of the CIWMP warrant a revision to one or more of the countywide planning documents. Specifically, ______. See Section 7 for the revision schedule(s).

**Additional Analysis (optional)**

The County has lost several thousand residents in the wake of the 2017 Tubbs and Nuns fires. Many were forced to relocate due to the high rent and rebuilding costs.

**Section 4.2 Changes in Quantities of Waste within the County or Regional Agency; and Changes in Permitted Disposal Capacity and Waste Disposed in the County or Regional Agency**

A number of tools to facilitate the analysis and review of such changes in the waste stream are available from the following CalRecycle sources:

a. CalRecycle's Disposal Reporting System tracks and reports the annual estimates of the disposal amounts for jurisdictions in California; additional California solid waste statistics are also available.

b. CalRecycle’s Waste Flow by Destination or Origin reports include solid waste disposal, export, and alternative daily cover. They show how much waste was produced within the boundaries of an individual city, or within all jurisdictions comprising a county or regional agency. These data also cover what was disposed at a particular facility or at all facilities within a county or regional agency.

2. The Waste Characterization Database provides estimates of the types and amounts of materials in the waste streams of individual California jurisdictions in 1999. For background information and more recent statewide characterizations, please see https://www2.calrecycle.ca.gov/WasteCharacterization/

3. CalRecycle’s Countywide, Regionwide, and Statewide Jurisdiction Diversion Progress Report provides both summary and detailed information on compliance, diversion rates/50 percent equivalent per capita disposal target and rates, and waste diversion program implementation for all California jurisdictions. Diversion program implementation summaries are available at https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram

Together, these reports help illustrate changes in the quantities of waste within the county or regional agency as well as in permitted disposal capacity. This information also summarizes each jurisdiction’s progress in implementing the Source Reduction and Recycling Element (SRRE) and complying with the 50 percent diversion rate requirement (now calculated as the 50 percent equivalent per capita disposal target), see Per Capita Disposal and Goal Measurement (2007 and Later) for details.

☐ The county or regional agency (if it includes the entire county) continues to have adequate disposal capacity (i.e., equal to or greater than 15 years).
☐ The county does not have 15 years remaining disposal capacity within its physical boundaries, but the Siting Element does provide a strategy\(^1\) for obtaining 15 years remaining disposal capacity.

The disposal of waste in 2015 was 387,833.67 tons and in 2018, the disposal tonnage was 360,199.33 after fire debris was credited. Data for 2019 was not available at the time of writing.

The diversion of materials from the landfill in 2015 was 172,194.11 tons and was 143,790.29 in 2018, the most recent diversion number available.

In November 2019, Republic Services reported to ZWS that the Central Disposal Site (SWIS# 49-AA-0001) has an estimated 26 years of operational life remaining.

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\(^1\) Such a strategy includes a description of the diversion or export programs to be implemented to address the solid waste capacity needs. The description shall identify the existing solid waste disposal facilities, including those outside of the county or regional agency, which will be used to implement these programs. The description should address how the proposed programs shall provide the county or regional agency with sufficient disposal capacity to meet the required minimum of 15 years of combined permitted disposal capacity.
The county does not have 15 years remaining disposal capacity and the Siting Element does not provide a strategy for obtaining 15 years remaining disposal capacity. See Section 7 for the revision schedule(s).

**Analysis**

These changes in quantities of waste and changes in permitted disposal capacity since the development of the CIWMP do **not** warrant a revision to any of the countywide planning documents.

These changes in quantities of waste and changes in permitted disposal capacity since the development of the CIWMP warrant a revision to one or more of the planning documents. Specifically, _____. See Section 7 for the revision schedule(s).

**Additional Analysis (optional)**

**Section 4.3 Changes in Funding Source for Administration of the Siting Element (SE) and Summary Plan (SP)**

Since the approval of the CIWMP or the last Five-Year CIWMP Review Report (whichever is most recent), the county experienced the following significant changes in funding for the SE or SP:

- ____

**Analysis**

There have been no significant changes in funding for administration of the SE and SP or the changes that have occurred do **not** warrant a revision to any of the countywide planning documents. Specifically, _____.

These changes in funding for the administration of the SE and SP warrant a revision to one or more of the countywide planning documents.

**Additional Analysis (optional)**

Zero Waste Sonoma receives a tipping fee surcharge on all refuse disposed in the County of Sonoma-owned transfer stations. Additionally, ZWS receives funding based on the amount of green waste and wood waste disposed of at the County of Sonoma-owned transfer stations. Due to the effects of COVID-19, it is estimated that Central landfill will receive less material, resulting in a reduction of ZWS budget beginning with FY 2020-2021 and continuing for an undetermined time thereafter. These changes are reflected in a modified 2020-2021 budget approved by the Board of Directors on May 20, 2020. See Section 7 for the revision schedule(s).

In 2017, Zero Waste Sonoma increased the surcharge for organics collection to cover the costs of SB 1383 implementation.
Section 4.4 Changes in Administrative Responsibilities
The county experienced significant changes in the following administrative responsibilities since the approval of the CIWMP or the last Five-Year CIWMP Review Report (whichever is most recent):

- There have been no significant changes in administrative responsibilities or the changes in administrative responsibilities do not warrant a revision to any of the planning documents.

Specifically, Zero Waste Sonoma continues to implement the Sonoma Countywide Integrated Waste Management Plan. In 2017, the Board of Directors approved renewal of ZWS’s agreement for the agency to continue administering the CoIWM and assist member jurisdictions with solid waste legislation compliance.

With the passage of SB 1383, ZWS added an Organics Program Manager position to implement organics policy and education initiatives.

These changes in administrative responsibilities warrant a revision to one or more of the planning documents. Specifically, _____. See Section 7 for the revision schedule(s).

Additional Analysis (optional)
In 2019, the Agency changed their name to Zero Waste Sonoma to better align with the mission of the Agency.

Section 4.5 Programs that Were Scheduled to Be Implemented, But Were Not
This section addresses programs that were scheduled to be implemented, but were not; why they were not implemented; the progress of programs that were implemented; a statement as to whether programs are meeting their goals; and if not, what contingency measures are being enacted to ensure compliance with Public Resources Code Section 41751.

1. Progress of Program Implementation
   a. SRRE and Household Hazardous Waste Element (HHWE)
      - All program implementation information has been updated in the CalRecycle Electronic Annual Report (EAR), including the reason for not implementing specific programs, if applicable.
      - All program implementation information has not been updated in the EAR. Attachment _ lists the SRRE and/or HHWE programs selected for implementation, but which have not yet been implemented, including a statement as to why they were not implemented.

   b. Nondisposal Facility Element (NDFE)
      - There have been no changes in the use of nondisposal facilities (based on the current NDFEs and any amendments and/or updates).
      - Attachment A lists changes in the use of nondisposal facilities (based on the current NDFEs).
c. Countywide Siting Element (SE)
   - There have been no changes to the information provided in the current SE.
   - Attachment B lists changes to the information provided in the current SE.

d. Summary Plan
   - There have been no changes to the information provided in the current SP.
   - Attachment C lists changes to the information provided in the current SP.

2. Statement regarding whether Programs are Meeting their Goals
   - The programs are meeting their goals.
   - The programs are not meeting their goals. The discussion that follows in the analysis section below addresses the contingency measures that are being enacted to ensure compliance with PRC Section 41751 (i.e., specific steps are being taken by local agencies, acting independently and in concert with ________, to achieve the purposes of the California Integrated Waste Management Act of 1989) and whether the listed changes in program implementation necessitate a revision to one or more of the planning documents. ________

Analysis
   - The aforementioned changes in program implementation do not warrant a revision to any of the planning documents. Specifically, ________.
   - Changes in program implementation warrant a revision to one or more of the planning documents. Specifically, ________. See Section 7 for the revision schedule(s).

Additional Analysis (optional)

Section 4.6 Changes in Available Markets for Recyclable Materials
The county experienced changes in the following available markets for recyclable materials since the approval of the CIWMP or the last Five-Year CIWMP Review Report (whichever is most recent):

Analysis
   - There are no significant changes in available markets for recycled materials to warrant a revision to any of the planning documents.

   - Changes in available markets for recycled materials warrant a revision to one or more of the planning documents.

Specifically, the only recycled materials under Zero Waste Sonoma’s control is the hauling of residential organic waste. In 2015, the regional compost facility, Sonoma Compost, where organic material was previously being delivered for processing, closed. Zero Waste Sonoma contracts the out-hauling of organic material to Cold Creek Compost in Ukiah and to Redwood Landfill’s compost facility in Novato. ZWS is in negotiations for a service agreement with Renewable Sonoma to deliver organic materials to a permanent compost facility, which will be constructed in Santa Rosa.

ZWS is aware that issues beyond ZWS’s control affect the delivery of other curbside-collected, single-stream recyclable materials to their end markets due to China’s National Sword. The local waste
haulers have been managing these difficulties through stockpiling and delivering to alternative shipping destinations. At this time, the local waste haulers have found markets for all recyclable materials accepted in Sonoma County.

There has been a reduction in the collection of electronic waste and CRT since 2015.

In June 2015, there were 34 CRV redemption centers throughout Sonoma County and now there are only four remaining redemption centers. Zero Waste Sonoma submitted the CalRecycle Beverage Container Recycling grant application in August 2020 in hopes of adding 10 new redemption centers in Sonoma County. A decision is forthcoming.

Additional Analysis (optional)

Section 4.7 Changes in the Implementation Schedule
The following addresses changes to the county’s implementation schedule that are not already addressed in Section 4.5:

Analysis
☑ There are no significant changes in the implementation schedule to warrant a revision to any of the planning documents. Specifically, _____.
☐ Changes in the implementation schedule warrant a revision to one or more of the planning documents. Specifically, _____.

Additional Analysis (optional)

Note: Consider for each jurisdiction within the county or regional agency the changes noted in Sections 4.1 through 4.7 and explain whether the changes necessitate revisions to any of the jurisdictions’ planning documents.

SECTION 5.0 OTHER ISSUES OR SUPPLEMENTARY INFORMATION (optional)
The following addresses any other significant issues/changes in the county and whether these changes affect the adequacy of the CIWMP to the extent that a revision to one or more of the planning documents is needed:

Analysis
In November 2014, the AB 939 LTF recommended to the ZWS Board that a long-term planning process should be initiated for future operation of Sonoma County’s solid waste management system beyond 2030. It was suggested at that time to consider adding a formal long-term planning program ahead of the 2015 CoIWMP update in order to do so; however, this was not fulfilled. Revisiting this topic in 2020, the LTF recommends and ZWS approves the development of this type of guiding document prior to the next 5-year update, which may take the form of a standalone long-range plan or Zero Waste Plan.
independent of the CoIWMP. Prior to the COVID-19 outbreak, ZWS staff were scheduled to participate in strategic planning sessions with board members to lay out these high-level plans and goals. ZWS staff agrees with the LTF in that a longer-term plan for managing Sonoma County’s solid waste and adhering to state regulations in a sustainable manner is needed, and will reschedule these planning sessions when it is safe to do so, or alternately via a virtual meeting. Following these sessions, ZWS intends to use a consultant to help with the development of the guidance document to supplement future CoIWMP updates and Electronic Annual Reports (EARs).

In August of 2018, the Sonoma County Local Task Force (LTF) on Integrated Waste Management took action to form an Ad Hoc subcommittee referred to as the LTF Permitting Issues Subcommittee. The purpose of the subcommittee was to identify barriers and impediments within the land use, regulatory, and other permitting processes that influence the timely and successful development of recycling, organics, and other solid waste processing and/or end market infrastructure. In addition to identification of issues, the subcommittee’s work included the development of recommendations for potential action to reduce the identified barriers and impediments and encourage policy, public awareness and entitlement processes that facilitate the reasonable development of the critical diversion infrastructure that will be needed to support state and local recycling, diversion and zero waste goals and legislation. The findings of this subcommittee are included as attachment B.

### SECTION 6.0 ANNUAL REPORT REVIEW

☑ The Annual Reports for each jurisdiction in the county have been reviewed, specifically those sections that address the adequacy of the CIWMP elements. No jurisdictions reported the need to revise one or more of these planning documents.

☐ The Annual Reports for each jurisdiction in the county have been reviewed, specifically those sections that address the adequacy of the CIWMP (or RAIWMP) elements. The following jurisdictions reported the need to revise one or more of these planning documents, as listed.

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**Analysis**

The discussion below addresses the county’s evaluation of the Annual Report data relating to planning document adequacy and includes determination regarding the need to revise one or more of the documents:

Zero Waste Sonoma files the Annual Report on behalf of all Sonoma County jurisdictions and the County of Sonoma.

### SECTION 7.0 REVISION SCHEDULE (if required)

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