To request a Time Extension (TE) or Alternative Diversion Requirement (ADR), please complete and sign this form and return it to your Office of Local Assistance (OLA) representative at the address below, along with any additional information requested by OLA staff. When all documentation has been received, your OLA representative will work with you to prepare for your appearance before the Board. If you have any questions about this process, please call (916) 341-6199 to be connected to your OLA representative.

Mail completed documents to:

California Integrated Waste Management Board
Office of Local Assistance, (MS 25)
1001 I Street
PO Box 4025
Sacramento CA 95812-4025

General Instructions:

For a Time Extension complete Sections I, II, III-A, IV-A, and V.

For an Alternative Diversion Requirement complete Sections I, II, III-B, IV-B and V.

Section I: Jurisdiction Information and Certification

All respondents must complete this section.

I certify under penalty of perjury that the information in this document is true and correct to the best of my knowledge, and that I am authorized to make this certification on behalf of:

Jurisdiction Name City of Brawley		County Imperial	
Authorized Signature Jerry Santillan		Title City Manager	
Type/Print Name of Person Signing Jerry Santillan	Date 1-31-03	Phone (760) 344-5800	
Person Completing This Form (please print or type) JB West		Title Recycling Coordinator, Imperial Valley Waste Management Task Force	
Phone (760)337-4338	E-mail Address jwest@CityofElCentro.org	Fax (760)337-3172	
Mailing Address 1275 Main Street	City El Centro	State CA	ZIP Code 92243

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Section I: Jurisdiction Information and Certification

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Jurisdiction Name	County
City of Brawley	Imperial
Authorized Signature	Title
	City Manager

Type/Print Name of Person Signing	Date	Phone
Jerry Santillan	1-31-03	(760) 344-5800

Person Completing This Form (please print or type)	Title
JB West	Recycling Coordinator, Imperial Valley Waste Management Task Force

Phone	E-mail Address	Fax
(760)337-4538	jwest@CityofElCentro.org	(760)337-3172

Mailing Address	City	State	ZIP Code
1275 Main Street	El Centro	CA	92243

ver Sheet

This cover sheet is to be completed for each Time Extension (TE) or Alternative Diversion Requirement (ADR) requested.

1. Eligibility

Has your jurisdiction filed its Source Reduction and Recycling Element, Household Hazardous Waste Element, and Nondisposal Facility Element with the Board (must have been filed by July 1, 1998 if you are requesting an ADR)?

☐ No. If no, stop; not eligible for a TE or ADR.

☒ Yes. If yes, then eligible for a TE or ADR.

2. Specific Request and Length of Request

Please specify the request desired.

☐ **Time Extension Request**

Specific years requested _ _____

Is this a second request? ☐ No ☐ Yes Specific years requested. _ _____
(**Note:** Requests for an additional extension will need to address why the jurisdiction's efforts to meet the 50% goal by the end of the first extension were not successful.)

☒ **Alternative Diversion Requirement Request (*Not allowed for Regional Agencies*).**

Specific ADR requested _44.35_____%, for the years_July 23, 2002 - July 23, 2004_____.

Is this a second ADR request? ☒ No ☐ Yes Specific ADR requested _ ____%, for the years _ _____
(**Note:** Requests for an additional ADR will need to address why the jurisdiction's efforts to meet 50% by the end of the first ADR period were not successful.)

Note: Extensions may be requested anytime by a jurisdiction, but will only be effective in the years from January 1, 2000 to January 1, 2006. An original request for a TE/ADR may be granted for any period up to three years and subsequent requests for TE/ADR may extend the original request or be based on new circumstances but the total number of years for all requests cannot total more than five years or extend beyond January 1, 2006.

Section IIIA—TIME EXTENSION

Within this section, discuss your jurisdiction's progress in implementing diversion programs that were planned to achieve 50%. Provide any additional information that demonstrates "good faith effort." The CIWMB shall determine your jurisdiction's progress in demonstrating "good faith effort" towards complying with AB 939. Note: The answers to each question should be comprehensive and provide specific details regarding the jurisdiction's situation.

Attach additional sheets if necessary—please reference each response to the appropriate cell number (e.g., IIIA-1).

1. **Why does your jurisdiction need more time to meet the 50% goal? Describe why SRRE selected programs did not achieve 50% diversion. Identify barriers to meeting the 50% goal and briefly indicate how they will be overcome.**

2. **Why does your jurisdiction need the amount of time requested? Describe any relevant circumstances in the jurisdiction that contribute to the need for a Time Extension.**

3. **Describe your jurisdiction's Good Faith Efforts to implement the programs in its SRRE.**

4. **Provide any additional relevant information that supports the request.**

Section IIIB—ALTERNATIVE DIVERSION REQUIREMENT

Within this section, discuss your jurisdiction's progress in implementing diversion programs that were planned to achieve 50%. Provide any additional information that demonstrates "good faith effort." The CIWMB shall determine your jurisdiction's efforts in demonstrating "good faith effort" towards complying with AB 939. Note: The answers to each question should be comprehensive and provide specific details regarding the jurisdiction's situation.
Attach additional sheets if necessary—please reference each response to the appropriate cell number (e.g., IIIB-1.).

1. Why does your jurisdiction need and Alternative Diversion Requirement? Describe why SRRE selected programs did not achieve 50% diversion. Identify barriers to meeting the 50% goal and briefly indicate how they will be overcome.

Programs listed in the extension request are existing and/or new programs. The new programs need time for scheduling and implementation. Outreach and education needed to obtain the projected diversion rates take time and must be continuous and repetitive to have the necessary impact. It was expected that the programs implemented would achieve the required diversion rates; however, given the unusual nature of the Imperial Valley, the programs alone have not been sufficient for several reasons.

Imperial Valley covers 4,597 square miles with a population density of 31 people per square mile. However, Mexicali, the capital city of Baja California is situated directly across the border and has an estimated population of 850,000. Over 9 million vehicles cross the border into Imperial Valley annually carrying millions of legally and illegally employed workers who substantially contribute to the solid waste disposal but not necessarily to recycling efforts. Imperial Valley is also visited by 1,500,000 bird watchers, off road enthusiasts and winter "snow birds" each year resulting in increased volumes of solid waste. This influx of people substantially skews the formula for determining disposal statistics.

Approximately 75% of the population in Imperial Valley is Hispanic with English as a second language. Educational efforts are proceeding, first at the schools, and slowly at other community events. All brochures, fact sheets, and advertisements have been translated into Spanish. Displays have been set up at public facilities, i.e. City Hall, library, utilities payment areas. The Task Force and City of Brawley Public Works staff have scheduled more public information and community outreach events.

In 1999 the City of Brawley, along with the County and the other six incorporated cities in the County, formed the Imperial Valley Waste Management Task Force to implement and evaluate all elements of the jurisdictions' SRREs. The Task Force unsuccessfully used outside consultants until 2000 to manage SRRE programs. In 2000, with declining diversion percentages, the Task Force began to develop an in-house staff with the City of El Centro as lead agency Initial turnover and inexperience stymied early efforts, but current staff are making progress.

There are also cultural differences regarding what constitutes "trash," the concept of recycling, and paying for these services. The City of Brawley is the only jurisdiction in the Task Force which provides its own trash hauling. The equipment and layout of the community has created some difficulties in establishing curbside programs. The City of Brawley, however, has dedicated one of its sanitation workers to solicit business accounts for recycling (primarily cardboard) pickup. The City of Brawley has also redesigned the Public Works Yard parking lot and access area to provide for a drive through drop off area for recycling. A new HHW facility is also under construction in Brawley. The City of Brawley has also been successful in encouraging contractors to recycle construction and demolition materials.

In 2002 Allied Waste brought in new management that has provided more solid support for recycling efforts. The relationship between the hauler and the Task Force is improving and as a result, more services are being offered, i.e. commercial recycling and Christmas Tree recycling. Allied Waste is discussing helping the City of Brawley by negotiating a contract for use of the MRF and accepting greenwaste at the landfill for ADR.

The City of Brawley's diversion rate history has been inconsistent despite the fact that several programs were implemented since 1995. The diversion rate was 39% in 1995, 40% in 1996, 3% in 1997, no rate in 1998, 31% in 1999, and 30% in 2000. This was the major indicator in establishing a new base year, which was completed during 2002 for the year 2000. The diversion rate originally submitted on the new base year was in excess of 60%. However, because the packing sheds were unable to provide authenticated weight tickets, only 31% was verified. Brawley submitted a revised base year which was board approved at 40%.

However, the new and existing programs will not contribute high enough diversion rates to meet the 50% diversion requirement. The new programs that the Task Force and the City of Brawley are implementing will require time for creation of the infrastructure and implementation schedule, i.e. construction and demolition and composting services.

2. Why is your jurisdiction requesting an Alternative Diversion Requirement in lieu of a Time Extension?

The City of Brawley needs two years to meet the diversion requirements because:
The development of a C & D ordinance requires buy-in from stakeholders as well as legal review. We believe that this is the area that will provide the most benefit towards meeting the diversion requirements.
The re-allocation of staff time to resource reduction, reuse, and recycling activities will require time for contacts, development of materials, purchase of additional supplies, and training.

3. Describe your jurisdiction's Good Faith Efforts to implement the programs in its SRRE.

In 1992 the City of Brawley adopted a comprehensive plan to meet the diversion requirements over 10 years. In 1995 the City of Brawley's diversion rate was 39%, which was board approved, indicating that the City of Brawley was successfully implementing its long term goals. During the past three years a number of events have occurred which have positively impacted the implementation of our long-term strategies. Our successes are a result of the following:

Formation of the Imperial Valley Waste Management Task Force, a joint powers agreement.

Participation in funding the 1992 SRRE plan by all eight Cities and Imperial County.

Construction of the Household Hazardous Waste Facility, which began operation on January 5, 2002.

Establishing a new HHW facility in Brawley which will open by March 2003.

Employment of fulltime staffing budgeted through 2006.

Employment of an educational consultant to present a comprehensive education program for grades 4 through 6.

Reallocation of the time of a solid-waste employee to include three hours per day of source reduction, reuse, and recycling activities.

Hiring Charles Tenborg of EcoSolutions to manage and operate the HHW facilities.

Commercial cardboard pick up has been implemented.

Established city operated public drop off center to accept cardboard and beverage containers.

Annual spring clean up conducted in which residents are able to set out white goods which are recycled at scrap metal vendor.

Grasscycling at public areas.

Public works staff have attended an ARAM (Asphalt Rubber Aggregate Membrane) workshop to consider using recycled rubber/asphalt in repair and maintenance projects.

Staff considering conctracting with local company to recycle the asphalt and concrete for city.

4. Describe any relevant circumstances in the jurisdiction that contribute to the need for an ADR. Provide any relevant information that supports the request.

The City of Brawley and the other members of the Imperial Valley Waste Management Task Force are moving toward becoming a regional agency during 2002. Becoming a part of a regional agency will reinforce efforts to meet the diversion requirements.

Several changes in demographics including an increase in population have increased the amount of waste generation.

Since 1991, Brawley has increased its sales tax rate causing a decline of new businesses.

Section IV A—PLAN OF CORRECTION

A Plan of Correction is required by PRC Section 41820(a)(6)(B). The plan is fundamentally a description of the actions the jurisdiction will take to meet the 50% goal by the expiration of the Time Extension.

Attach additional sheets if necessary.

Residential %		Non-residential %	

PROGRAM TYPE Please use the Board's Program Types. The Program Glossary is online at: www.ciwmb.ca.gov/LGCentral/PARIS/Codes/Reduce.htm	NEW or EXPAND	DESCRIPTION OF PROGRAM	FUNDING SOURCE	DATE FULLY COMPLETED	ESTIMATED PERCENT DIVERSION
		Total Estimated Diversion Percent From New and/or Expanded Programs			
		Current Diversion Rate Percent From Latest Annual Report			
		Total Planned Diversion Percent Estimated			

PROGRAMS SUPPORTING DIVERSION ACTIVITIES

PROGRAM TYPE	NEW or EXPANDED	DESCRIPTION OF PROGRAM	DATE FULLY COMPLETED

Section IV B—GOAL ACHIEVEMENT

Goal Achievement describes the activities the jurisdiction will use to achieve the ADR.
Attach additional sheets if necessary..

Residential %	43	Non-residential %	57

PROGRAM TYPE Please use the Board's Program Types. The Program Glossary is online at: www.ciwmb.ca.gov/LGCentral/PARIS/Codes/Reduce.htm	NEW or EXPAND	DESCRIPTION OF PROGRAM	FUNDING SOURCE	DATE FULLY COMPLETED	ESTIMATED PERCENT DIVERSION
1000-SR-XGC 2070-RC-GOV	Expand New	City staff will expand grasscycling from the existing 30 acres of parks and schools currently being grasscycled to the remaining public areas. Christmas trees were collected and shredded by Public Works staff in 2002, and used as ADC. This program will be continued by City Public Works staff every year.	IVWMTF City of Brawley	7-23-04	.25
1010-SR-BM	New	IVWMTF staff are working with a master composter to conduct free workshops for interested community members. Distribution of free or low-cost composting bins for backyard composting program will occur at these events. A local high school agriculture teacher has expressed interest in collaborating with IVWMTF staff to create a compost demonstration site to educate students and the public.	IVWMTF	12-31-03	.10
1020-SR-BWR	Expand	City Public Works staff have ordered recycling bins, and promotional materials for elementary schools. Businesses and schools who are not participating in the existing cardboard recycling program, and who are interested in signing up, will be contacted by IVWMTF staff and provided with bins and training. A city ordinance does exist that requires restaurants and bars to recycle beverage containers. City Public Works staff are responsible for enforcing the ordinance.	IVWMTF & City of Brawley	1-31-04	2
2010-RC-DRP	Expand	Parking area at Public Works yard will be redesigned allowing vehicles to enter and exit in separate locations. Additional 4 yard bins will be provided for residential drop off of cardboard/paper, plastic, aluminum, and glass.	City of Brawley	6-30-03	2
		Total Estimated Diversion Percent From New and/or Expanded Programs			4.35
		Current Diversion Rate Percent From Latest Annual Report			40
		Total Planned Diversion Percent Estimated			44.35

PROGRAMS SUPPORTING DIVERSION ACTIVITIES			
PROGRAM TYPE	**NEW or EXPAND**	**DESCRIPTION OF PROGRAM**	**DATE FULLY COMPLETED**
5000-ED-ELC	Expand	Community-based social marketing study is currently being conducted to ascertain the barriers to program participation. A budget has been approved and vendors contracted with for cable-casting advertising, television advertising, 8-page newsletter, and PSAs. Additional instructional staff are being recruited for classroom presentations in elementary and middle school for resource reduction, reuse, and recycling programs. High-recognition entertainment level school assembly is scheduled for elementary school. Installation of display stands in public buildings that will house fact sheets, brochures, and other informational literature.	6-30-04
7040-FR-ADC	Expand	Area hauler and landfill operator with ADC permit is in process of accepting City of Brawley greenwaste. Materials recovery facility is also developing program to accept single stream recyclables from City of Brawley hauler	7-23-04
1050-SR-GOV	Expand	IVWMTF staff have provided a model procurement policy with accompanying resolution and techniques from implementation. City offices will adopt a procurement policy and its accompanying administration procedures. This will require purchasing of recycled materials, double-sided printing, routing memos, etc	6-30-04

Section V – PARIS

Office of Local Assistance staff will be reviewing your Jurisdiction's Planning Annual Report Information System (PARIS) database printout as part of the evaluation of your request. Should the Jurisdiction have updates or revisions to the program implementation from the latest Annual Report submitted to the Board, please attach to the application the Jurisdiction's PARIS database printout showing updates or revisions.

Contact your Office of Local Assistance Representative at (916) 341-6199 for a copy of PARIS, or go to the Board's website at **www.ciwmb.ca.gov/LGCentral/PARIS/**.