
Proposed Revisions to IWMA Solid Waste Management Fee

From Terry Schubert <pterryschubert@gmail.com>

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To Coby Skye <cskye@iwma.com>; Janet Weldon <JWeldon@iwma.com>

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1254 Marsh Street
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June 3, 2026

James Guthrie, President, City of Arroyo Grande
Coby Skye, Executive Director
Navid Fardanesh, Vice President, Special Districts
Robert Robert, Past President, City of Grover Beach
Charles Bourbeau, City of Atascadero
Cyndee Edwards, City of Morro Bay
John Hamon, City of El Paso de Robles
Heather Moreno, County of San Luis Obispo, District 5 Supervisor
Scott Newton, City of Pismo Beach
Michelle Shoresman, City of San Luis Obispo
San Luis Obispo County Integrated Waste Management Authority
555 Chorro St. Suite D-2
San Luis Obispo, California 93405

VIA ELECTRONIC MAIL

Re: Proposed Revisions to IWMA Solid Waste Management Fee

Dear Mr. Guthrie, Mr. Skye and IWMA Board Members:

I serve as legal counsel to the San Luis Obispo County Garbagemen's Association. Our members include San Luis Garbage Company, South County Sanitary Service, Mission Country Disposal, Morro Bay Garbage Service, Atascadero Waste Alternatives, Paso Robles Waste Disposal and San Miguel Garbage Company, as well as their affiliates. These companies provide solid waste services to customers with all of the IWMA member jurisdictions.

My purpose in writing this letter to you is to provide you with our thoughts and recommendations regarding the IWMA Board of Director's consideration of revisions to the IWMA Solid Waste Management Fee (SWM Fee), which I understand will be discussed at your meeting on June 10th.

For the reasons set forth below, we respectfully request that the IWMA adopt a simplified rate structure, and set the SWM Fee at one percentage rate that would apply to all solid waste customers, regardless of whether these customers receive residential or commercial services, or whether they are located in areas that are subject to SB 1383 requirements or are exempt from the regulations adopted pursuant to that legislation.

There are a number of reasons which support our request that the SWM Fee be a unitary rate applicable to all customers. It is extremely difficult and time consuming to apply different rates to customers based upon the census tract criteria which is used for determining SB 1383 compliance. A simple system of charging one set percentage SWM Fee enables the hauler to collect and account for these fees in a more efficient and cost-effective manner.

Keeping the fee system simple ensures that all hauling companies will charge each customer the same fee, and will eliminate anomalies that may exist because companies serving different jurisdictions may use different definitions for "residential" or "commercial" service. One example of such a situation arises with mobilehome

parks, which, while residential in nature, may receive service in a manner typically provided to commercial customers (by using large bins placed in central locations) or may be provided with services provided to residential customers (by picking up wastewheelers located at each unit within the park).

Additionally, we believe that the SWM Fee should be the same percentage for businesses and residential customers, for both efficiency and equity reasons. From our perspective, any differences in providing services to these customers is already reflected in the rate structure, and applying the same percentage Fee to all customers is preferable to any other system.

Lastly, we would respectfully request that, whatever decision the Board makes, the SWM Fee is set at a rate that is as low as possible. The hauling companies and our customers have seen many costs rise significantly since the beginning of the year, including but not limited to unforeseen fuel price and insurance increases, which are a large component of the cost of providing solid waste services. Our customers are also currently facing potential increases in food costs, health care costs and costs in other areas. We believe that keeping solid waste costs increases to a minimum is a necessity at this time.

In closing we greatly appreciate your consideration of our thoughts and position with regard to these fees.

Respectfully yours,

P. Terence Schubert

cc: San Luis Obispo County Garbagemen's Association

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