



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

April 19, 2024

The Honorable Dave Min
Member, California State Senate
1021 O Street, Room 6710
Sacramento, CA 95814

**RE: Senate Bill 972 – Support
As Amended April 15, 2024**

Dear Senator Min:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to support your Senate Bill 972, regarding organic waste management. RCRC is an association of forty rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from each member county.

Senate Bill 972 requires CalRecycle to prepare and submit to the Legislature reports on SB 1383 organic waste recycling implementation and recommendations for program modifications to achieve SB 1383's ambitious diversion goals. SB 972 also requires CalRecycle to develop a process for local governments to request technical assistance on how to comply with, and implement, that law. Finally, SB 972 requires the Air Resources Board and CalRecycle to coordinate their organic waste reduction policies to reduce duplication and conflicting directives to local governments.

SB 1383 requires the state to reduce landfill disposal of organic waste 75 percent below 2014 levels by 2025. CalRecycle's implementing regulations impose costly and far-reaching obligations on local governments to achieve those diversion goals. While those regulations are generally tailored to work within the solid waste collection system that exists in urban areas, they are often poorly suited to deal with the needs and challenges of lower-population and rural areas.

RCRC appreciates and supports SB 972's effort to improve coordination among different state agencies to reduce duplication and conflicts for local governments trying to implement organic waste diversion laws. RCRC also supports the requirement for CalRecycle to evaluate SB 1383 implementation and make recommendations on program modifications to better achieve the state's organic waste diversion targets.

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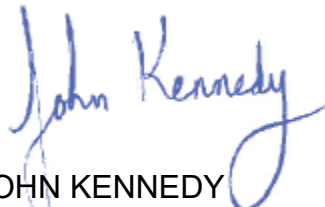
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With respect to the technical assistance aspect of SB 972, RCRC strongly supports efforts to provide local governments with compliance assistance and resources to implement SB 1383, especially before CalRecycle exercises its enforcement authority. While CalRecycle has provided technical assistance to local governments under SB 1383, that experience has varied significantly from jurisdiction to jurisdiction for two key reasons. First, the existing regulations are rigid and inflexible and so provide little, if any, ability for CalRecycle's local assistance or enforcement staff to respond to the needs and challenges of diverse local governments. Second, the technical assistance offered on a given issue has varied wildly from jurisdiction to jurisdiction. In some cases, the technical assistance offered is either unsupported by - or inconsistent with - existing law. These challenges must be addressed to ensure that the technical assistance is ***helpful*** and does not further complicate implementation challenges. For these reasons, we strongly suggest that CalRecycle build additional flexibility into their regulations to facilitate their adaptation to diverse circumstances. Similarly, it is imperative that CalRecycle's technical assistance be consistent, well-grounded in existing law, and provide flexibility to local governments to meet local needs and constraints.

For the above reasons, RCRC is pleased to support your SB 972. If you should have any questions, please do not hesitate to contact me at jkennedy@rcrcnet.org.

Sincerely,



JOHN KENNEDY
Senior Policy Advocate

cc: The Honorable Benjamin Allen, Chair, Senate Environmental Quality Committee
Members of the Senate Environmental Quality Committee
Brynn Cook, Consultant, Senate Environmental Quality Committee
Scott Seekatz, Consultant, Senate Republican Caucus