



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

April 3, 2023

The Honorable Tina McKinnor
Member, California State Assembly
1021 O Street, Room 5520
Sacramento, CA 95814

**RE: Assembly Bill 1705 – Oppose
As Amended March 21, 2023**

Dear Assembly Member McKinnor:

On behalf of the Rural County Representatives of California (RCRC), we regretfully oppose your Assembly Bill 1705, regarding solid waste management. RCRC is an association of forty rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties.

Assembly Bill 1705 seeks to ban the establishment or expansion of transformation or engineered municipal solid waste (EMSW) conversion facilities until the state source reduces, recycles, or composts 75% of its solid waste for three consecutive years.

Local governments have long been responsible for management and disposal of the state's solid waste stream and charged with meeting the state's recycling and diversion goals. Many local governments have achieved the state's 50% diversion requirement. Some of our member counties have adopted zero waste policies; however, others have struggled to achieve the state's 50% diversion mandate because of the inherent hardships they face, including population levels and density, distance to market, economies of scale, etc.

Local governments are strong supporters of recycling; however, we must maintain a portfolio of waste management options in recognition of the fact that there will always be residuals that cannot be feasibly recycled, composted, or source-reduced and which must otherwise be disposed. Local governments may have exhausted all other options for recycling and be interested in disposal through transformation or EMSW conversion long before the state achieves its 75% statewide goal. We must regretfully oppose AB 1705 because it removes a potential tool for solid waste management from our collective toolbox. Rather than send these wastes to a landfill, it makes far more sense to put them

1215 K Street, Suite 1650, Sacramento, CA 95814 | www.rcrcnet.org | 916.447.4806 | Fax: 916.448.3154

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The Honorable Tina McKinnor
Assembly Bill 1705
April 3, 2023
Page 2

to productive use. RCRC also fears that AB 1705 will act as a long-term barrier to creation of new hydrogen production facilities that will be sorely needed by certain sectors and fleets that cannot feasibly be served by electric vehicles and equipment.

RCRC cannot ignore California's stringent environmental requirements that would apply to any attempt to build a new or expand an existing transformation or EMSW conversion facility. California already has among the most stringent environmental regulations in the world. Any new facilities (or expansions) would have to comply with existing emissions and solid/hazardous waste management laws and mitigate any significant environmental impacts under the California Environmental Quality Act. RCRC believes that California's robust regulatory and environmental standards are sufficient to address, mitigate, and avoid any negative impacts associated with these types of facilities.

For these reasons, we must regretfully oppose your AB 1705. If you should have any questions, please do not hesitate to contact me at jkennedy@rcrcnet.org.

Sincerely,



JOHN KENNEDY
Policy Advocate

cc: The Honorable Luz Rivas, Chair, Assembly Natural Resources Committee
Members of the Assembly Natural Resources Committee
Elizabeth MacMillan, Consultant, Assembly Natural Resources Committee
Casey Dunn, Consultant, Assembly Republican Caucus