



Rural Counties
Environmental Services
Joint Powers Authority

ESJPA

CHAIR – MICHAEL KOBSEFF, SISKIYOU COUNTY
VICE CHAIR – LORI PARLIN, EL DORADO COUNTY
EXECUTIVE DIRECTOR – PATRICK BLACKLOCK

TECHNICAL ADVISORY GROUP (TAG)

TAG CHAIR – TEDD WARD, DEL NORTE COUNTY
TAG VICE CHAIR – RACHEL ROSS-DONALDSON,
TEHAMA COUNTY
PROGRAM MANAGER – STACI HEATON

September 22, 2021

Mr. Richard Corey
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: 2022 Scoping Plan Update—Short-Lived Climate Pollutants (SLCP)

Dear Mr. Corey:

On behalf of the 24-member Rural Counties' Environmental Services Joint Powers Authority (ESJPA), thank you for the opportunity to provide preliminary comment on the 2022 Scoping Plan Update—Short-Lived Climate Pollutants (SLCP). Our members represent Boards of Supervisors, Public Works Directors, Solid Waste Managers, and Recycling Coordinators. Our members are responsible for operating or overseeing their jurisdictions solid waste operations.

The members of the ESJPA have been charged with ensuring that their respective counties meet state-imposed requirements to reduce waste being disposed in landfills and increase recycling/re-use efforts for certain products. Our counties' solid waste managers are dedicated to providing meaningful, environmentally conscious, and cost-effective solid waste services to their residents and businesses.

ESJPA members have worked diligently with staff at the California Department of Resources Recycling and Recovery (CalRecycle) to delay implementation of the SLCP Organics requirements pursuant to Senate Bill 1383 (Lara, 2016) to 2025 for counties with populations of less than 70,000, the same counties which received an extension in the Mandatory Commercial Organics Recycling (MORe) regulations. Many of our member counties are in areas of air quality attainment while also facing the biggest challenges with meeting the procurement, infrastructure and collection requirements contained in the final regulations. We have also advocated for much needed funding recently passed by the Legislature as part of the 2021-22 State Budget Package to aid local jurisdictions in implementation.

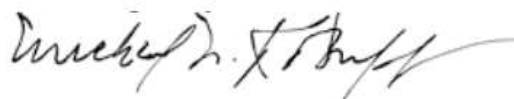
While ESJPA is committed to continuing our collaborative work with CalRecycle on SB 1383 implementation, there are still challenges to fully realizing the benefits from the measure. Namely, our member counties are grappling with whether mandatory curbside/route collection of organics to every household and business is truly required in the regulations, an issue we are struggling to resolve with CalRecycle staff. As the January 1, 2022 implementation deadline approaches for many jurisdictions and they are beginning their Proposition 218 process to raise rates for mandatory curbside/route collection, many counties are finding that residents are opposed and pushing back on the affordability in lower income communities and for the elderly and disabled residents in the rural areas that are unable to physically maneuver the collection carts to an appropriate location.

Many rural counties also have areas that are sparsely populated so it is not economically feasible to conduct collection routes and/or are inaccessible to solid waste collection trucks. The regulations fail to recognize that many rural communities have areas with unpaved roads or where the roads are not wide enough or strong enough to accommodate frequent use by solid waste collection vehicles. It also fails to recognize that some roads and areas are “snowed in” during parts of the year and will be inaccessible to large vehicles.

ESJPA has requested clarification from CalRecycle on the mandatory collection issue and has yet to receive a fully satisfactory response. We will continue working with CalRecycle staff to come up with a workable solution while our jurisdictions prepare for implementation; however, the mandatory collection interpretation is creating a regulatory mandate that is not implementable in many rural communities and an implementation and political nightmare.

Please do not hesitate to contact our ESJPA Program Manager Staci Heaton at sheaton@rcrcnet.org or (916) 447-4806 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Kobseff". The signature is fluid and cursive, written in a professional style.

Supervisor Michael Kobseff, Siskiyou County
Chair, Rural Counties ESJPA