



Rural Counties
Environmental Services
Joint Powers Authority
ESJPA



LEAGUE
OF CALIFORNIA
CITIES

February 9, 2021

Members of the California State Legislature
State Capitol
Sacramento, CA 95814

RE: Urgent Actions to Increase Convenience of Consumer Redemption Opportunities

Members of the California Legislature:

On behalf of the Rural County Representatives of California (RCRC), the Rural Counties' Environmental Services Joint Powers Authority (ESJPA), the California State Association of Counties (CSAC), and the League of California Cities, we urge your prompt action to make several urgent changes to the Beverage Container Recycling Program to address the lack of convenient redemption opportunities in many parts of the state.

With the closure of many certified recycling centers, "convenient" beverage container redemption opportunities do not exist for many Californians in rural and even urban areas. According to data from the California Department of Resources Recycling and Recovery (CalRecycle), 31 of California's 58 counties have five or fewer recycling centers. Three of those counties have NO recycling centers, seven have only a single recycling center, and six only have two recycling centers. In five counties, each recycling center serves residents living in an area of over 3,000 square miles. There are also several counties in which there is one recycling center for each 100,000 residents (three of those counties have one center per 200,000+ residents).

Without convenient redemption opportunities, the Beverage Container Recycling Program can easily become a regressive tax that disproportionately impacts lower-income Californians. These concerns are even more acute during the coronavirus (COVID-19) pandemic, when many more Californians are struggling to make ends meet.

Furthermore, the lack of adequate redemption opportunities, combined with the global downturn in recycling markets, has resulted in many beverage containers ending up in the landfill or littered in the environment.

We recognize that the Statewide Commission on Recycling Markets recently suggested eight emergency legislative actions to increase the convenience of redemption opportunities and believe that many of those ideas will meaningfully improve the state's beverage container recycling efforts and redemption opportunities.

We take this opportunity to suggest the following actions:

- Allocate additional funding to facilitate the opening or reopening of recycling centers in rural and underserved areas.
- Use penalty funds and retailer Public Resources Code Section 14571.6 in-lieu payments to assist in the siting and operation of recycling centers in rural and underserved areas.
- Allow the Director of CalRecycle to authorize flexibility in the required hours of operation for redemption centers in rural and underserved areas.
- Allow the Director of CalRecycle to authorize recycling centers to temporarily operate by appointment where high customer demand, weather, and/or health concerns merit alternative operating conditions.
- Allow the Director of CalRecycle to temporarily increase daily load limits for dealers during the COVID-19 pandemic and in rural areas where longer distances to recycling centers necessitate fewer trips with larger quantities of containers.
- Allow the Director of CalRecycle to increase processing and handling payments to recycling centers in rural and underserved areas to account for the higher costs of recycling and transportation in those areas.
- Explore options to make redemption centers whole for the cost of redeeming beverage containers from consumers.
- Allow retailers to redeem consumer beverage containers at the store site rather than in-store.
- Reevaluate convenience zone exemption criteria in the absence of local redemption centers.

These changes should be implemented regardless of any discussions about longer-term changes to the Beverage Container Recycling Program. They will help to quickly increase the number and convenience of redemption opportunities in rural and underserved areas of the state.

If you should have any questions, please do not hesitate to contact John Kennedy of RCRC and ESJPA at jkennedy@rcrcnet.org or (916) 447-4806, Catherine Freeman of CSAC at cfreeman@counties.org or (916) 662-6400, or Derek Dolfie of League of California Cities at ddolfie@cacities.org or (916) 658-8218.

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Sincerely,



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Legislative Advocate
Rural County Representatives
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Rural Counties' Environmental Services
Joint Powers Authority



CATHERINE FREEMAN
Legislative Representative
California State Association
of Counties



DEREK DOLFIE
Legislative Representative
League of California Cities

cc: The Honorable Gavin Newsom, Governor, State of California
Jared Blumenfeld, Secretary, California Environmental Protection Agency
Caroline Godkin, Deputy Secretary, Environmental Policy and Emergency
Response, California Environmental Protection Agency
Rachel Wagoner, Director, California Department of Resources Recycling and
Recovery
Mindy McIntyre, Deputy Director of Legislative Affairs, California Department of
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Elizabeth MacMillan, Consultant, Assembly Natural Resources Committee
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Genevieve Wong, Consultant, Senate Environmental Quality Committee
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