



August 16, 2022

The Honorable Rudy Salas
California State Assembly
1021 O Street, Suite 4610
Sacramento, CA 95814

RE: AB 2953 (Salas) Department of Transportation and local agencies: streets and highways: recycled materials [As Amended August 11, 2022] – OPPOSE

Dear Assembly member Salas:

On behalf of the City of Santa Rosa, I am writing to respectfully express our position of oppose on your bill, AB 2953 (Salas) which would require local agencies to apply standard specifications that allow for the use of recycled materials in streets and highways at or above the level allowed in the California Department of Transportation's (Caltrans) most recently published standard specifications, when feasible and cost effective.

We have been tracking the development of AB 2953 through the committee process and appreciate the amendments to specify that local agencies have flexibility in determining whether adopting the specifications for the materials outlined in the bill are feasible and cost effective. However, we remain concerned the lack of clarification on the definition of both "feasible" and "cost-effective," and the potential cost burden local agencies would face implementing the provisions of this bill.

The Governor's veto message for your previous bill AB 1035 (Salas, 2021), which was substantially similar, highlighted that requiring all local agencies that have jurisdiction over streets and highways to comply with Caltrans' recycling standards may result in increased costs and would create a reimbursable state mandate. The Governor's veto message also cited objections to forcing local agencies to adopt standards by Caltrans that are specifically designed for larger projects that address a greater volume of traffic and may be inappropriate for all local streets and roads, and the committee analysis likewise noted concerns from CalTrans that the specifications it has adopted for use of recycled materials on state highway projects may not always be applicable for local streets and roads projects.

As a local agency who prioritizes sustainability, we are supportive of using recycled materials on our public works projects when appropriate to the project, and at a percentage that maintains quality of the material, and if cost effective. However, the cost of ascertaining this standard for

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each project could be prohibitive. Smaller local agencies like our own tend to have limited staff bandwidth and this would place additional burdens to adequately measure the best practices, affordability, and feasibility of implementing these standards for recycled materials in our roads for every project. Further, the bifurcated application process based on an agency's financial stability versus a more traditional option such as a population threshold is problematic.

For these reasons, we have concerns regarding the standard AB 2953 would implement and must respectfully oppose this bill at this time. Should you have any questions please contact our legislative advocate, Sharon Gonsalves, with the Renne Public Policy Group, at (916) 974-9270.

Sincerely,

Chris Rogers
Mayor, Santa Rosa

CC: The Honorable Anthony Portantino, Chair Senate Appropriations Committee
Members, Senate Appropriations Committee
Senator Mike McGuire
Assemblymember Marc Levine
Assemblymember Jim Wood
Ronda Paschal, Deputy Legislative Secretary, Office of Governor Gavin Newsom