

## **REQUEST FOR APPROVAL**

**To:** Zoe Heller, Acting Deputy Director  
Materials Management and Local Assistance Division

**From:** Cara Morgan, Branch Chief  
Local Assistance and Market Development

**Request Date:** April 01, 2022

**Decision Subject:** Compliance Investigation Results Regarding the Implementation of  
Mandatory Commercial Recycling (MCR) and/or Mandatory  
Commercial Organics Recycling (MORE) Programs for the  
Jurisdictions listed in Attachment 1

**Action By:** April 19, 2022

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### **Summary of Request:**

A key component in maintaining the success of the Mandatory Commercial Recycling (MCR) and Mandatory Organics Recycling (MORE) laws is CalRecycle's role in overseeing how well jurisdictions are implementing these programs. Pursuant to Public Resources Code (PRC) Sections 42649.3 (g) and 42649.82 (g)(1), CalRecycle reviews each jurisdiction's compliance with these laws as part of the reviews required by PRC Section 41825. Additionally, CalRecycle may evaluate at any time whether a jurisdiction is in compliance with these two laws pursuant to PRC Sections 42649.3 (h) and 42649.82 (g)(2). Specifically, CalRecycle can exercise its statutory authority to initiate a review and may refer a jurisdiction to enforcement at any time that CalRecycle receives information that a jurisdiction has not implemented, or is not making a good faith effort to implement, its required programs. This led to the development of the "At Anytime Review Process."

In January 2017, CalRecycle's Director sent a letter to all jurisdictions informing them of the "At Any Time Review Process." The process specifies that if staff identifies a gap in how a jurisdiction is implementing the requirements of either of these laws, then:

- Staff will inform the jurisdiction that a formal Letter of Concern from CalRecycle to the jurisdiction is coming. Once the letter is received, the jurisdiction will have 30 days to respond.
- After CalRecycle receives the jurisdiction's response to the letter, or lack thereof, an agenda item for approval by CalRecycle's Materials Management and Local Assistance Division (MMLA) Deputy Director will be presented at a CalRecycle monthly public meeting. The agenda item will indicate one of three potential staff recommendations:

1. The jurisdiction failed to respond and staff recommends that the jurisdiction be referred to CalRecycle's Enforcement Branch for consideration of a compliance order; or
2. The jurisdiction's response to the letter is inadequate and staff recommends that the jurisdiction be referred to the Enforcement Branch for consideration of a compliance order; or
3. The jurisdiction's response to the letter is adequate and staff recommends that the program be monitored. However, if the same gaps persist within the next year, an agenda item that refers the jurisdiction to the Enforcement Branch for consideration of a compliance order will be presented at CalRecycle's next monthly public meeting.

This Request for Approval addresses Local Assistance and Market Development (LAMD) staff's review finding that the jurisdictions listed have gaps in program implementation for MCR and/or MORE. These gaps were determined during LAMD staff's annual review of these jurisdictions. LAMD staff informed the jurisdictions of the identified program gaps, sent them a Letter of Concern, and gave them at least 30 days to submit a response that explained how they would address the program gaps. The jurisdictions submitted a plan that, if implemented, may adequately address the MCR and/or MORE program gaps.

Accordingly, LAMD staff will also closely monitor the jurisdictions over the next six months. If at any time during this period staff finds that either jurisdiction has not made adequate progress on implementing the plan that it submitted to CalRecycle, or otherwise addressing the gaps in its MCR and MORE programs, then that jurisdiction will be referred immediately to the Enforcement Branch. The Enforcement Branch will then conduct an independent investigation and may consider whether a compliance order should be issued. Jurisdictions that fail to satisfy the conditions of a compliance order may be subject to a fine of up to \$10,000 per day.

**Recommendation:**

Staff recommends that it be determined that these jurisdictions have each submitted a plan that may adequately address their program gaps and that staff will monitor their progress over the next six months.

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**Deputy Director Action:**

Based on the information and analysis in this Request for Action and the findings set out above, I hereby approve the recommendation that the jurisdictions indicated have submitted adequate responses in accordance with the "At Any Time Review Process" and that they will not be referred to the Enforcement Branch at this time. I direct staff to further monitor all of these jurisdictions over the next six months. If, at any time during this period, any jurisdiction is found to not be fully implementing its plan to address the identified gaps, that jurisdiction will be referred to the Enforcement Branch for consideration of whether a compliance order should be issued.

Dated: 4/19/2022



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Zoe Heller, Acting Deputy Director  
Materials Management and Local Assistance

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Attachment 1 contains a listing of the Jurisdictions referenced in this Request for Approval.

### **Background Information**

Over the past several years, the Legislature and Governor have set ambitious goals to increase recycling and reduce solid waste disposal, in part driven by associated greenhouse gas emission reductions. In particular, Assembly Bill 341 set a goal of reducing landfill disposal by 75 percent by 2020 and established mandatory commercial recycling (MCR) requirements, and Assembly Bill 1826 established mandatory commercial recycling (MORE) requirements. The purpose of MCR and MORE is to reduce greenhouse gas emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. Each jurisdiction is responsible to implement a MCR and a MORE program appropriate for that jurisdiction. The program is to be designed to divert commercial solid waste from regulated businesses, whether or not the jurisdiction has met the requirements of PRC Section 41780. Each jurisdiction is required to report its progress achieved in implementing the MCR and MORE laws, including identification of covered businesses, education and outreach provided to covered businesses, monitoring of program implementation, and if applicable, enforcement efforts taken by the jurisdiction, by providing updates in the annual report required by PRC Section 41821.

Statute requires CalRecycle to review each jurisdiction's report to determine whether the jurisdiction has complied with, or made a good faith effort to comply with, the requirements of the MCR and MORE laws. For purposes of this evaluation, "good faith effort" means all reasonable and feasible efforts by a jurisdiction to implement its commercial recycling program in accordance with the MCR and MORE laws (see PRC Sections 42649.3 (i) and 42649.82 (h)). CalRecycle need not wait for a jurisdiction's report, however, to review a jurisdiction's compliance. CalRecycle may also evaluate whether the jurisdiction is in compliance at any time CalRecycle receives information the jurisdiction has not implemented, or is not making a good faith effort, to implement its MCR and MORE programs (see PRC Sections 42649.3 (h) and 42649.82 (g)(2)).

In determining compliance with this requirement, CalRecycle's evaluation may include, but is not limited to, the following factors:

- The extent to which businesses have implemented the MCR and commercial MORE recycling programs;
- The recovery rate of the commercial waste from the material recovery facilities that are utilized by the businesses;
- The extent to which the jurisdiction is conducting education and outreach to businesses;
- The extent to which the jurisdiction is monitoring businesses, and notifying those businesses that are out of compliance;
- The availability of markets for collected recyclables;
- Budgetary constraints; and
- In the case of rural jurisdictions, the effects of small geographic size, low population density, or distance to markets.

(See PRC Sections 42649.3 (h) and 42649.82 (g)(2).)

As a result of its review, CalRecycle may find that a jurisdiction:

- 1) has made a good faith effort to implement its MCR and/or MORE programs; or
- 2) has failed to adequately implement its MCR and/or MORE program, and in such a case may further consider issuance of a compliance order. Jurisdictions that fail to satisfy the conditions of a subsequent compliance order may be subject to a fine of up to \$10,000 per day.

Staff's analysis of program implementation is based upon the Countywide Integrated Waste Management Plan Enforcement Policy Part II (Enforcement Policy), originally adopted on April 25, 1995, substantially amended on August 2001 (by CalRecycle's predecessor, the California Integrated Waste Management Board), and further revised by CalRecycle in June 2015, pursuant to AB 341, AB 1826, and AB 1594. Pursuant to PRC Section 41825 (e)(3), staff utilizes the criteria delineated in the Enforcement Policy to determine the extent to which a jurisdiction has implemented, or has shown a good faith effort to implement, its MCR and MORE programs. The scenarios in the Enforcement Policy provide illustrative criteria that serve as examples of the issues staff utilizes in examining local jurisdiction program implementation.

## **Findings**

CalRecycle's LAMD staff extensively reviewed each jurisdiction during 2020, 2021, and 2022 as a part of its annual reviews by conducting conference calls and on-site visits to verify program implementation and by reviewing documentation, including annual reports, hauler data, outreach and education materials, etc. This investigation determined the extent to which each jurisdiction has implemented PRC Sections 42649 et seq. and 42649.8 et seq.

As a result of reviewing these jurisdictions, LAMD staff identified the program gaps listed in this Request for Approval. Staff then discussed these program gaps with the

jurisdictions and, pursuant to the “At Any Time Review Process” described above, sent a Letter of Concern that provided the jurisdictions at least 30 days to submit a plan to correct the gaps. Subsequently, the jurisdictions responded with information detailing how the gap would be addressed.

LAMD staff will closely monitor the jurisdictions over the next six months. If at any time during this period LAMD staff finds that either jurisdiction has not made adequate progress on implementing the plan that it submitted to CalRecycle, or has not otherwise addressed its MCR and/or MORE program gaps, then it will be referred immediately to the Enforcement Branch, which will then conduct an independent investigation and consider whether a compliance order should be issued. Jurisdictions that fail to satisfy the conditions of a compliance order may be subject to a fine of up to \$10,000 per day. However, if the jurisdiction corrects the program gap(s) during this evaluation period, then the Enforcement Branch may determine that the jurisdiction has subsequently been found to be in compliance with PRC Sections 41825 and 42649.

The following is a summary of program gaps for the jurisdictions’ MCR and/or MORE programs. The summary also includes the information provided by the jurisdiction on how it will correct these gaps.

#### **City of Brawley (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of February 2022 is provided in Table 1: “Non-Compliance Rate for MCR and/or MORE Programs” below.

#### **Plan to Address Program Gaps:**

- The City will provide mandatory collection services to all covered businesses or issue waivers.
- To ensure effective follow up with those not recycling, City and hauler staff will provide updated education and outreach materials via mail and at on-site visits to non-compliant covered generators to increase participation.

#### **City of Calabasas (MORE)**

The jurisdiction is implementing its MORE program, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of April 2022 is provided in Table 1 below.

#### **Plan to Address MORE Program Gaps:**

- Provide mandatory collection services to all covered businesses or issue waivers.

#### **City of Calexico (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for

regulated businesses. The non-compliance rate as of February 2022 is provided in Table 1 below.

**Plan to Address Program Gaps:**

- The City will provide mandatory collection services to all covered businesses or issue waivers.
- To ensure effective follow up with those not recycling, City and hauler staff will provide updated education and outreach materials via mail, emails, phone calls and at on-site visits to non-compliant covered generators to increase participation.

**City of Calipatria (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of March 2022 is provided in Table 1 below.

**Plan to Address Program Gaps:**

- The City will amend its Franchise Agreement with its franchised hauler.
- The City will provide mandatory collection services to all covered businesses or issue waivers.
- To ensure effective follow up with those not recycling, City and hauler staff will provide updated education and outreach materials via mail, and at on-site visits to non-compliant covered generators to increase participation.

**City of Clovis (MORE)**

The jurisdiction is implementing its MORE program, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of December 2021 is provided in Table 1 below.

**Plan to Address Program Gaps:**

- The City will amend its Franchise Agreement with its franchised hauler.
- The City will provide mandatory collection services to all covered businesses or issue waivers.
- To ensure effective follow up with those not recycling, City and hauler staff will provide updated education and outreach materials via mail, and at on-site visits to non-compliant covered generators to increase participation.

**City of Coachella (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of December 2021 is provided in Table 1 below.

**Plan to Address Program Gaps:**

- The City will amend its Franchise Agreement with its franchised hauler.
- The City will provide mandatory collection services to all covered businesses or issue waivers.
- To ensure effective follow up with those not recycling, City and hauler staff will provide updated education and outreach materials via mail, and at on-site visits to non-compliant covered generators to increase participation.

#### **City of El Centro (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of February 2022 is provided in Table 1 below.

#### **Plan to Address program Gaps:**

- The City will provide mandatory collection services to all covered businesses or issue waivers.
- To ensure effective follow up with those not recycling, City and hauler staff will provide updated education and outreach materials via mail, and at on-site visits to non-compliant covered generators to increase participation.

#### **City of Galt (MORE)**

The jurisdiction is implementing its MORE program; however, there is currently still noncompliance and no demonstration of the City actively providing commercial recycling collection services to all covered generators. The non-compliance rates as of December 2021 is provided in Table 1 below.

#### **Plan to Address MORE Program Gaps:**

- Identify and notify noncompliant businesses that service will be delivered within 30 days of noticing once bins are made available by the hauler.
- Establish enforcement action for non-compliant generators.
- Establish hauler enforcement.

#### **City of Holtville (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of April 2021 is provided in Table 1 below.

- The City will amend its Franchise Agreement with its franchised hauler.
- The City will provide mandatory collection services to all covered businesses or issue waivers.
- To ensure effective follow up with those not recycling, City and hauler staff will provide updated education and outreach materials via mail, phone calls and at on-site visits to non-compliant covered generators to increase participation.

#### **City of Huntington Beach (MORE)**

The jurisdiction is implementing its MORE program, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of February 2022 is provided in Table 1 below.

**Plan to Address MORE Program Gaps:**

- City and hauler will enter into negotiations for a modified franchise agreement that will include comprehensive programs and mandated services for commercial organics generators.
- City or its contractor(s) will determine service needs for all non-compliant businesses and multi-family locations. The City is developing and implementing its program for the consideration and approval of waivers if applicable for commercial generators.
- The City will enact its Mandatory Commercial Organics Recycling Enforcement ordinance that will enable the City to implement mandatory service for customers that do not subscribe to service.

**City of Imperial (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of February 2022 is provided in Table 1 below.

**Plan to Address Program Gaps:**

- The City will provide mandatory collection services to all covered businesses or issue waivers.
- To ensure effective follow up with those not recycling, City and hauler staff will provide updated education and outreach materials via mail, and at on-site visits to non-compliant covered generators to increase participation.

**City of Lompoc (MCR & MORE)**

The jurisdiction is implementing its MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of January 2021 is provided in Table 1 below.

**Plan to Address MCR and MORE Program Gaps:**

- The City will provide mandatory collection services to all covered businesses or issue waivers.
- To ensure effective follow up with those not recycling, City staff will provide updated education and outreach materials at on-site visits to non-compliant covered generators to increase participation.

**City of Palos Verdes Estates (MCR & MORE)**

The jurisdiction is implementing its MCR & MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of February 2022 is provided in Table 1 below.



**Plan to Address MCR and MORE Program Gaps:**

- The City will enact its Mandatory Commercial Recycling Enforcement ordinance that will enable the City to impose penalties on non-compliant customers.
- The City will begin negotiations for a new exclusive solid waste franchise agreement, which would provide for automatic service to covered generators.

**City of San Clemente (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of March 2022 is provided in Table 1 below.

**Plan to Address MCR and MORE Program Gaps:**

- The City will enact its Mandatory Commercial Recycling Enforcement ordinance, that will enable the City to impose penalties on non-compliant customers after they have received two notices of non-compliance.

**City of San Marino (MORE)**

The jurisdiction is implementing its MORE program, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of February 2022 is provided in Table 1 below.

**Plan to Address MORE Program Gaps:**

- The City will amend its Franchise Agreement with its franchised hauler.
- The City will provide mandatory collection services to all covered businesses or issue waivers.

**City of Santa Fe Springs (MCR & MORE)**

The jurisdiction is implementing its MCR & MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of April 2022 is provided in Table 1 below.

**Plan to Address MCR and MORE Program Gaps:**

- Approve rate increases and provide notice to generators.
- Provide mandatory collection services to all covered businesses.
- The City will enact its Mandatory Commercial Recycling Enforcement ordinance that will enable the City to impose penalties on non-compliant customers.

**City of Stanton (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of April 2022 is provided in Table 1 below.

**Plan to Address MCR and MORE Program Gaps:**

- The City will enact its Mandatory Commercial Recycling Enforcement ordinance that will enable the City to take Enforcement Actions to address non-compliance with this ordinance including, but not limited to, issuing administrative citations, fines, penalties, or using other remedies.
- The City will amend its Franchise Agreement with its franchised hauler. As part of the amended franchise agreement, a dedicated recycling coordinator will be provided by the hauler to assist with commercial and multifamily compliance efforts, as well as public education and outreach.
- The City will provide mandatory collection services to all covered businesses or issue waivers.

**City of Tulare (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of August 2021 is provided in Table 1 below.

**Plan to Address MCR Program Gaps:**

- The City will identify all non-compliant MCR customers.
- The City will notify all non-compliant customers of their non-compliance and inform them of the requirement to sign up for recycling service.
- The City will provide mandatory collection services to all covered customers.
- To ensure effective follow up with those not recycling, City staff will provide updated education and outreach materials at on-site visits to non-compliant covered generators to increase participation.

**Plan to Address MORE Program Gaps:**

- The City will identify all non-compliant MORE customers.
- The City will notify all non-compliant MORE customers of their non-compliance and inform them that they will be required to sign up for organics recycling services.
- The City will provide mandatory organics collection services to all covered customers.
- To ensure effective follow up with those not recycling, City staff will provide updated education and outreach materials at on-site visits to non-compliant covered generators to increase participation.

**City of Tustin (MCR & MORE)**

The jurisdiction is implementing its MCR & MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of March 2022 is provided in Table 1 below.

**Plan to Address MCR and MORE Program Gaps:**

- The City has begun implementation of its enforcement ordinance and has begun the issuance of letters to non-compliant generators. Generators are provided with 15 days to come into compliance or be issued a Notice of Violation and would then be subject to face financial penalties.

#### **City of Visalia (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of the March 2022 report from the jurisdiction are in Table 1: “Non-Compliance Rate for MCR and/or MORE Programs” below.

##### **Plan to Address MCR and MORE Program Gaps:**

- The City will identify all non-compliant MCR and MORE customers.
- The City will notify all non-compliant customers of their non-compliance and inform them that they will be required to sign up for service.
- The City will provide mandatory collection services to all covered generators.
- To ensure effective follow up with those not recycling, City staff will provide updated education and outreach materials at on-site visits to non-compliant covered generators to increase services.
- The City will enact its Mandatory Commercial Recycling Enforcement ordinance that will enable the City to impose penalties on non-compliant customers.

#### **City of West Hollywood (MORE)**

The jurisdiction is implementing its MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of March 2022 is provided in Table 1 below.

##### **Plan to Address MORE Program Gaps:**

- The City will amend its Franchise Agreement with its franchised hauler.
- Provide mandatory collection services to all covered businesses or issue waivers.

#### **City of Westmorland (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of April 2021 is provided in Table 1 below.

- The City will amend its Franchise Agreement with its franchised hauler.
- The City will provide mandatory collection services to all covered businesses or issue waivers.
- To ensure effective follow up with those not recycling, City and hauler staff will provide updated education and outreach materials via mail, and at on-site visits to non-compliant covered generators to increase participation.

**County of Orange (MCR & MORE)**

The jurisdiction is implementing its MCR & MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rate as of February 2022 is provided in Table 1 below.

**Plan to Address MCR and MORE Program Gaps:**

- The County will provide mandatory collection services to all covered businesses or issue waivers.

**County of San Bernardino (MCR & MORE)**

The jurisdiction is implementing its MCR and MORE programs, but based on the monitoring numbers submitted by the jurisdiction, there is still non-compliance for regulated businesses. The non-compliance rates as of the March 2022 report from the jurisdiction are in Table 1 below.

**Plan to Address MCR and MORE Program Gaps:**

- The County will identify all non-compliant MCR and MORE customers.
- The County will notify all non-compliant customers of their non-compliance and inform them that they will be required to sign up for service.
- The County will provide mandatory collection services to all covered generators.
- To ensure effective follow up with those not recycling, County staff will provide updated education and outreach materials at on-site visits to non-compliant covered generators to increase participation.
- The County will enact its Mandatory Commercial Recycling Enforcement ordinance that will enable the County to impose penalties on non-compliant customers.

**Table 1: Non-Compliance Rate for MCR and/or MORE Programs**

<b>Jurisdiction</b>	<b>MCR Business Non-Compliance Rate</b>	<b>MCR Mulifamily Non- Compliance Rate</b>	<b>MORE Business Non-Compliance Rate</b>	<b>MORE Mulifamily Non- Compliance Rate</b>
City of Brawley	82%	82%	100%	100%
City of Calabasas	N/A	N/A	79%	78%
City of Calexico	49%	49%	99%	99%
City of Calipatria	23%	38%	28%	66%
City of Clovis	N/A	N/A	13%	0%
City of Coachella	39%	17%	57%	41%
City of El Centro	8%	35%	8%	48%
City of Galt	N/A	N/A	59%	NA
City of Holtville	16%	45%	24%	7%
City of Huntington Beach	N/A	N/A	54%	26%
City of Imperial	54%	54%	100%	100%
City of Lompoc	01%	47%	8%	22%
City of Palos Verdes Estates	27%	2%	57%	100%
City of San Clemente	14%	N/A	15%	N/A
City of San Marino	N/A	N/A	95%	N/A
City of Santa Fe Springs	55%	70%	96%	83%
City of Stanton	67%	83%	91%	88%
City of Tulare	38%	58%	95%	73%
City of Tustin	19%	24%	22%	21%
City of Visalia	15%	32%	46%	44%
City of West Hollywood	N/A	N/A	29%	49%
City of Westmorland	10%	10%	19%	0%
County of Orange	33%	11%	75%	42%
County of San Bernardino	42%	50%	60%	85%