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July 2, 2012

Ms. Carroll Mortensen, Director
CalRecycle
Department of Resources Recycling and Recovery
1001 I Street
P.O. Box 4025
Sacramento, CA 95812-4025

RE: Comments on May 9, 2012 “California’s New Goal: 75% Recycling” Document Issued by CalRecycle

Dear Ms. Mortensen:

I would like to take this opportunity to provide comments on the document issued by your agency titled: “California’s New Goal: 75% Recycling.” On behalf of our twelve Member Agencies here in central and southern San Mateo County, it is our pleasure to have the opportunity to participate in the stakeholder engagement process pursued by CalRecycle with regard to how the new 75% recycling by 2020 goal shall be met and sustained.

While we understand that the document you are currently seeking input on is a jumping off point to facilitate discussion and that the specific programs and policies contained in this plan are very much works in progress and not recommendations or policy perspectives of CalRecycle, we are generally pleased with the overall direction of CalRecycle’s stakeholder engagement process and the scope of items contained in this document.

In addition, as conveyed in the introductory opening sections of this document, we are in concurrence and support an approach to measure statewide compliance with the 75% recycling goal in terms of what is actually being recycled in lieu of a more complex and perhaps less accurate methodology based on the old paradigm of “diversion” which includes activities that are truly not “recycling” related such as use of alternative daily cover.

More specifically, we offer the following suggestions or comments:

- Support and agree that additional recycling manufacturing infrastructure is needed in the State, including approaches to streamline permitting required for such efforts.
- We have recently implemented new franchised collection services for a service area of nearly 500,000 residents and are more than happy to share our operational data and lessons learned.
- We have recently completed a \$46 million facility master plan, including a large single stream MRF, and are more than happy to share our design information and operational data.

610 Elm Street, Suite 202 : P: 650-802-3500 :
San Carlos, CA 94070 : F: 650-802-3501 : RethinkWaste.org

MEMBER AGENCIES: Town of Atherton • City of Belmont • City of Burlingame • City of East Palo Alto • City of Foster City • Town of Hillsborough
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- Support streamlining planning documents which will reduce costs for our 12 Member Agencies.
- For the past ten years we have prohibited the use of green waste for ADC uses per our franchise agreements. We support a statewide ban on the use of green waste for ADC.
- We support a phased statewide ban on the disposal of organics in sync with the development of new organics processing infrastructure. Such organics infrastructure needs to be developed closer to major population areas to reduce the high costs and environmental impacts of long haul distances to organics processing facilities.
- Support grants to jurisdictions for multi-family complex recycling programs.
- Support establishment of extended producer responsibility (EPR) laws for identified targeted materials. Such EPR approaches need to include elements to support the development of new or enhancement of existing end markets for recovered materials; and supplement, not replace, the existing role of local governments and private companies involved in the management of collection and processing programs.
- We support a statewide ban on cardboard going into the landfill.

We look forward to following this stakeholder engagement process closely and providing additional feedback as appropriate. Thanks for your leadership on this important effort and please feel welcome to reach out to us at any time.

Best Regards,



Kevin McCarthy, Executive Director

cc: Jim Porter, SBWMA Board Chair and San Mateo County Director of Public Works
Cliff Feldman, SBWMA Recycling Programs Manager
Monica Devincenzi, SBWMA Public Education and Sustainability Manager

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