



City Council
311 Vernon Street
Roseville, California 95678

December 3, 2013

Caroll Mortenson, Director
California Department of Resource Recycling and Recovery
1001 I Street
PO Box 4025
Sacramento, CA 95812-4025

[Submitted to 75Percent@calrecycle.ca.gov]

RE: Update on AB 341 Legislative Report: Statewide Strategies to Achieve the 75 Percent Goal by 2020

Dear Ms. Mortenson:

On behalf of the City of Roseville, I wanted to express my appreciation for the opportunity to comment on CalRecycle's Update on the upcoming AB 341 Legislative Report. CalRecycle has done an excellent job of providing a public stakeholder process that has been open, transparent and shows the value that your agency places on feedback from diverse stakeholders.

On the contents of the update, we recognize that the 75 percent statewide recycling goal by 2020 mandated by the passage of Assembly Bill (AB) 341 (Chapter 476, Statutes of 2011) is no easy undertaking and see CalRecycle's upcoming report to the Legislature as a critical document that will inform policymakers to meet the state's mandated goal.

In our June 7, 2012 letter to you from then-Mayor Pauline Rocucci, we underscored the need for CalRecycle to place emphasis on developing statewide processing and manufacturing infrastructure for targeted recyclable materials, prior to any mandated material bans from landfills. As we have seen over the years, "bans without a plan" has led to disastrous impacts that are usually felt by and dealt with at the local government level, at the cost to taxpayers and those paying their utility bills. A viable, robust processing and manufacturing infrastructure in place first will help to ensure that any landfill material bans, such as one on organics, can lead to a successful outcome. Roseville was pleased to see that infrastructure development was prominently featured in your update as a clear priority and we want to emphasize that infrastructure development should be the first activity in the sequence of whatever actions are ultimately recommended by CalRecycle.

Secondly, Roseville supports CalRecycle addressing regulatory streamlining to support the development of manufacturing infrastructure that uses recycled material and the streamlining of regulations governing the siting of such manufacturing facilities. This streamlining of regulations will require state regulatory agencies to coordinate better and be open to taking a second look at rigid or antiquated regulatory structures that prevent the state from reaching 75 percent statewide recycling goal by 2020.

Additionally, it also important to provide this same regulatory flexibility and streamlining for facilities that are able to beneficially process organics materials in the state. The gauntlet of regulatory barriers that currently exist to permit and build organics composting capacity or waste to energy facilities acts as a damper on local governments and private entities from making pro-active investments in creating this needed infrastructure. Roseville is one of those

communities that is already proactively examining local options to beneficially use organics waste in coordination with other local government agencies. Addressing this issue head-on in your upcoming report to the Legislature should remain a priority from Roseville's perspective.

Thank you again for your leadership on this issue and we look forward to seeing CalRecycle's final report to the Legislature in January 2014.

Sincerely,



Susan Rohan,
Mayor

CC: Assemblymember Beth Gaines
Senator Jim Nielsen
Jason Gonsalves, Gonsalves and Son