



ANGELES CHAPTER

3435 Wilshire Blvd. Suite 320, Los Angeles, CA 90010  
213-387-4287 fax 213-387-5383  
<http://angeles.sierraclub.org>

February 12, 2012

Ms. Caroll Mortensen, Director  
Department of Resources Recycling and Recovery  
1001 I Street  
Sacramento, CA 95812

Re: Comments on Draft Report, "*California's New Goal: 75% Recycling*"

Dear Ms. Mortensen,

On behalf of the Zero Waste Committee of the Sierra Club's Angeles Chapter, I want to commend you for leading the development of a bold plan to increase source reduction, recycling, and composting in California.

We applaud your Department for starting with an honest assessment of the waste stream, and of various practices that currently count as "recycling" or "diversion" from landfills that are anything but, including practices that deliberately deposit source separated yard trimmings into landfills.

We noted that you have included a wide range of suggestions and approaches in the report, and if there is one statement we want to convey above all, it is to **steer clear of half measures and watered-down proposals**. Given the dire predictions of climate change impacts to our State and the billions of tons of materials we have already buried over the last several decades, we cannot afford to wait. We know what ideas work and what ideas simply delay the inevitable.

For example, most landfill operators in California have already stopped using yard trimmings as "alternative daily cover" – it is expensive, a waste of resources, and increases greenhouse gas emissions from landfills. Eliminating the perverse "recycling credits" for this activity would be a good start. Placing a surcharge on this activity and allocating the revenue to subsidizing new composting and anaerobic digestion projects in the State would begin to move us towards 75%.

Another good example is banning cardboard from disposal. If certain materials have robust markets and a high value throughout the State, such as cardboard, there is no reason not to ban them, and we encourage you to expand the list of such materials beyond just cardboard. **We strongly support the phase out of organics from landfills given the significant impact on the environment from their continued disposal**. When markets are not as strong, product bans should be coupled with financial incentives for additional infrastructure (recycling, composting,

anaerobic digestion and most importantly, manufacturing) as you have suggested, otherwise there will not be sufficient markets for the materials recovered from disposal.

We were pleased to see extended producer responsibility, or EPR, included in the report. We believe this is an excellent tool to keep materials circulating in the economy and to encourage greener product design. **We hope to see EPR and source reduction prioritized and expanded in future versions of the report.**

**We encourage you to push for game changing ideas.** In order to move California to a cradle-to-cradle economy, we urge you to support legislation that would prohibit products that are not either recyclable or compostable, and that contain any toxic ingredients, unless absolutely necessary. For products that remain, a hefty disposal surcharge should be added. If a surcharge accompanied the disposal of toxic products, manufacturers would have a major incentive to redesign their products, consumers would have a clear market signal to buy environmentally preferable products, and the costs for managing products at the end of their useful life would no longer be externalized.

The members of our committee represent many facets of our community, from concerned citizens to disposal management professionals, and we hope to be an integral part of the stakeholder process as the report is finalized. We agree with you that AB 341 provides us with an “invitation to define the future” and **we support you in changing the paradigm fundamentally to eschew our wasteful past and to embrace a Zero Waste future.**

Sincerely,

Hillary Gordon  
Chair, Zero Waste Committee  
Sierra Club Angeles Chapter