

California's New Goal: 75% Recycling



Public Review Comment Form

Name: Alison Loukeh
Representing: City of Upland
Email: aloukeh@ci.upland.ca.us
Phone: (909) 291-2935

Please provide your comments in the boxes below corresponding to the sections of the Plan.

Introductory Information

Thoughts From the Director

The Numbers! What Does 75% Recycling Mean?

Policy Drivers

1. Increase Recycling Infrastructure

1a. Funding for Infrastructure

Recycling infrastructure is generally very expensive and would take many years to complete. Although the goal is set for 2020, it is conceivable that due to funding issues it is not possible to complete the necessary changes within that time frame.

How useful would this concept be in helping achieve the 75% statewide recycling goal?

Critical

Somewhat Useful

Irrelevant

1b. Regulatory Oversight

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

1c. Strategic Facilitation and Incentivizing Of Facility Siting

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

1d. Modify RMDZ Program To Be Statewide

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

1e. Increase Recycling Manufacturing Business Assistance

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

1f. Increase Collection Efficiency/Quality

Collection efficiency is a key component in increasing the amount of recycled materials. This is difficult to enforce at the "curb" and better methods must be utilized to improve in this area.

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

1g. Streamline Planning Documents

1. The elimination of any documents would be helpful including the CIWMP.
4. We are unsure of the impact this might have on a municipality such as our City as we have no control over County operations.

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

1h. Communications Outreach on Infrastructure

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

1. What Did We Miss?

2. Organics

2a. Greenwaste ADC

How useful would this concept be in helping achieve the 75% statewide recycling goal?

Critical

Somewhat Useful

Irrelevant

2b. Organics Disposal Phase-out

In the implementation section, it is not clear who is targeted in this section, specifically whether sewage treatment plants or industry targets.

How useful would this concept be in helping achieve the 75% statewide recycling goal?

Critical

Somewhat Useful

Irrelevant

2c. Funding for Organics Infrastructure

How useful would this concept be in helping achieve the 75% statewide recycling goal?

Critical

Somewhat Useful

Irrelevant

2d. Indirect Incentives

How useful would this concept be in helping achieve the 75% statewide recycling goal?

Critical

Somewhat Useful

Irrelevant

2e. Regulatory Changes re: ADC, food, etc.

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant
-

2f. Cross-Agency Regulatory Issues

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant
-

2g. Biomethane Pipeline Issue

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant
-

2. What Did We Miss?

3. Increase Commercial Recycling

3a. Reduce Thresholds for Commercial Recycling

Reducing the threshold for commercial recycling to a lesser amount (half of the current threshold) would be difficult to implement and costly. In Upland, this would include the majority of commercial accounts. Additionally, this would greatly increase the need for outreach to this sector causing considerable staff time as well.

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

3b. Increase Requirements for MRF (Material Recovery Facility) Performance

The costs of upgrading MRF facilities may be a significant challenge and as this section acknowledges without possible cost recovery.

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

3c. Establish Business Enforcement Component

Requiring local jurisdictions to establish enforcement programs would be cost prohibitive.

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

3d. Grants for Multi-Family Recycling Programs

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

3e. Awards for Businesses

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant
-

3. What Did We Miss?

4. Establish Extended Producer Responsibility

4a. Authority to Decide Products and Targets

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant
-

4b. Packaging

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

4. What Did We Miss?

5. Reform Beverage Container Program

5a. Redefine Commingled Rate

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

5b. Expansion of Minimum Content Requirements

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

5c. Program Expansion of All Ready-to-Drink Beverages

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

5d. Elimination of 14581 Fixed Dollar Expenditures

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

5e. Fiscal Reform to Provide More Funding

"Add costs to beverage product, but not to refund amount" seems counter intuitive. A more clear explanation would be helpful.

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

5. What Did We Miss?

6. Increase Procurement/Demand

6a. Increase PCRC and EPP Purchases by the State

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

6b. Reform SABRC Requirements and Add Enforcement

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

6c. Interagency Agreements with Caltrans and Other Procuring Agencies For Testing TDPs

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

6d. Minimum Content Requirements

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

6e. Sales Tax Breaks on Private Sector Purchase of RCPs/EPPs

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

6f. Financial Incentives for Manufacturer Use of Recycled Materials

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

6. What Did We Miss?

7. Other Materials**7a. Tire Incentive Payments, EPR, or More Market Demand**

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

7b. Plastics

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

7c. E-Waste

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

7d. C&D Funds for Retrofitting Equipment To Meet AQ Standards

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

7e. C&D: Expand CALGreen For Deconstruction and Add Enforcement

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

7f. Fiber: Bans on Cardboard Going Into Landfills

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

7g. Fiber/Resin: Grants/Payments for Mid-Scale Manufacturing & Source Reduction

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

7h. Used Oil LCA Follow-ups'

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

7. What Did We Miss?

8. Governance/Funding

8a. New Models for Funding Waste/Materials Management

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

8b. Other Code-Level Ideas

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

8c. Authority For Waste and Bottle Bill Functions Such As Enforcement, Data Gathering, Monitoring, Etc.

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

8. What Did We Miss?

9. Source Reduction

9a. Organics Food Programs, Backyard Composting, Vermicomposting

Currently, residential composters are costly. To be successful, a significant grant to subsidize this cost must be in place to offset costs including outreach and equipment.

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

9b. Greener Products Through Product Certifications/Eco Labels

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

9c. Promotion of Local Zero Waste Activities

While zero waste is an admirable theoretical goal in certain areas, for example beverage containers, it is unrealistic to hold local jurisdictions to this goal in a broader sense. Upland does not have the financial resources for either staff or equipment to make this a relevant possibility.

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

9. What Did We Miss?

10. The Other 25%**10a. Define Post-Recycled Residuals**

How useful would this concept be in helping achieve the 75% statewide recycling goal?

- Critical Somewhat Useful Irrelevant

10b. Define Beneficial Use For Policy for Other 25

How useful would this concept be in helping achieve the 75% statewide recycling goal?

Critical

Somewhat Useful

Irrelevant

10. What Did We Miss?

General Comments

