

# DEPARTMENT OF PUBLIC WORKS

FLOOD CONTROL • LAND DEVELOPMENT & CONSTRUCTION • OPERATIONS  
SOLID WASTE MANAGEMENT • SURVEYOR • TRANSPORTATION



COUNTY OF SAN BERNARDINO

## SOLID WASTE MANAGEMENT DIVISION

222 West Hospitality Lane, Second Floor • San Bernardino, CA 92415-0017 • (909) 386-8701  
Administration/Engineering Fax (909) 386-8900

GERRY NEWCOMBE  
Director of Public Works

June 14, 2012

**JUN 19 2012**

Ms. Caroll Mortensen, Director  
Department of Resources Recycling and Recovery (CalRecycle)  
1001 I Street  
P.O. Box 4025  
Sacramento, California 95812-4025

**SUBJECT: CALRECYCLE'S DRAFT REPORT "CALIFORNIA'S NEW GOAL: 75% RECYCLING"**

Dear Ms. Mortensen:

Thank you for the opportunity to comment on CalRecycle's Draft Report "California's New Goal: 75% Recycling" dated May 9, 2012. We appreciate your commitment to stakeholder involvement in the development of the final report.

The County of San Bernardino Solid Waste Management Division has the following comments and concerns regarding the draft report:

- The plan, as outlined in the draft report, would greatly impact the solid waste management industry, further reducing declining revenue to landfill owners and effectively putting the landfills out of business.
- The plan calls for the reclassification of Alternate Daily Cover, beneficial reuse, and material transformation as a disposal activity instead of diversion. This may impact jurisdictions' compliance with AB939's mandate of 50% diversion.
- The proposal, if implemented, would increase the AB341 diversion rate of 75% by an additional 16% to a 91% diversion by 2020, which would negatively impact the economies of jurisdictions in California. An analysis of the economic impacts of this proposal is needed.
- The proposed phase out of landfilling organics will have an additional impact on the amount going to the landfill, further decreasing revenues for landfill owners/operators.
- The report does not address the significant increased costs for implementation of the recommendations to achieve the policy goal of 75% by local governments, residents and businesses.
- CalRecycle is looking at increases in the Integrated Waste Management Act tipping fee to help pay for the new programs/goals, which will further reduce revenue to landfill owners.

### Board of Supervisors

GREGORY C. DEVEREAUX  
Chief Executive Officer

BRAD MITZELFELT ..... First District      NEIL DERRY ..... Third District  
JANICE RUTHERFORD ..... Second District      GARY C. OVITT ..... Fourth District  
JOSIE GONZALES ..... Fifth District

June 14, 2012  
Ms. Carol Mortensen  
Page 2

We appreciate the opportunity to provide our comments and we look forward to continuing to work with CalRecycle in refining the report in the coming months. If you have any questions or comments, please contact me at (909) 386-8701.

Sincerely,

A handwritten signature in blue ink that reads "Arthur L. Rivera". The signature is written in a cursive style with a large initial "A" and a long, sweeping underline.

Arthur L. Rivera, P.E.  
Interim Division Manager

AR:MP:ro