



July 2, 2012

Caroll Mortensen, Director
Department of Resources Recycling and Recovery (CalRecycle)
P.O. Box 4025
Sacramento, CA 95812-4025

Dear Ms. Mortensen,

The California Association of Local Conservation Corps (CALCC) applauds your vision to take the state towards 75% waste diversion. CALCC is an association of 13 statewide certified local conservation corps that work with young men and women to preserve and protect the environment and provide job skills training and educational opportunities to our members. CALCC has been an integral partner with the state in attaining increased levels of recycling in California.

As you know, increasing recycling not only reduces pollution and greenhouse gas emissions, it also expands economic development and creates green California jobs. By offering an alternative to unemployment, incarceration, and substance abuse to more than 40,000 young adults over the past 25 years, CALCC is unique among the green jobs generators of the state's recycling program in that we not only reduce pollution and generate economic activity but also invest in California's most at-risk youth and train tomorrow's future green leaders.

It is with the success of our partnership in the past that I write to you to express concern with your proposal in "California's New Recycling: 75%" to eliminate "continuous" appropriations to CALCC. The Bottle Bill program currently contains certain automatic continuous appropriations, including \$15 million plus a cost-of-living-adjustment for the local conservation corps. The 75% Recycling report proposes to eliminate those appropriations and replace them with a planning process for surplus revenues. At a time when the state is increasing the waste diversion goal, we feel it would be counterproductive to eliminate support the local conservation corps, which contribute to the state's recycling success.

Although we understand the department's desire for increased flexibility in how it appropriates program revenue, CALCC is concerned that the volatile nature of the alternatives the department has proposed for PRC Section 14581 would threaten our ability to continue our historic partnership with the state to increase recycling. Injecting extreme uncertainty into the future of our program would risk jeopardizing our ability to continue to help with increasing recycling in California while investing in our economy and youth. In addition, the report acknowledges the contribution to achieving the new diversion goal would be minimal at best at potentially reducing administrative costs. The lost value of these appropriations to the local conservation corps and the impact they have on recycling rates would eclipse any savings to CalRecycle with this change.

Letter to Carol Mortensen

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CALCC is eager to partner with the state in meeting a new 75% recycling goal, while attaining the unique co-benefit of investing in California's most needed areas and investing in future green leaders. The 75% goal single-handedly underscores and reinforces the importance of the work our corps members do and reaffirms the relevance of the job skills training we give them. This is why we are concerned about the proposed changes to the Bottle Bill program to eliminate fixed dollar appropriations. We would not be able to continue our partnership under the proposed alternative funding proposals. For these reasons, we encourage you to see what value the appropriations to the local conservation corps have created and the opportunities they have afforded to California's youth, and we strongly request that the proposed change to the program to eliminate fixed dollar appropriations be rejected and that CalRecycle find a way to maintain funding for the local conservation corps.

Sincerely,



Marilee Eckert
CALCC President

California's New Goal: 75% Recycling



Public Review Comment Form

Name:

Representing:

Email:

Phone:

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

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

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

Critical

Somewhat Useful

Irrelevant

1g. Streamline Planning Documents

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

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

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

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

Critical

Somewhat Useful

Irrelevant

3c. Establish Business Enforcement Component

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

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**

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

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