

Thank you for the opportunity to review and comment on the Year 3 Annual Report. Please accept the comments below:

- Overall, jurisdictions that have established direct or indirect contacts have benefited from the program. There are still underserved rural areas that still need ongoing paint management options.
- Increasing the Financial Incentive for Reuse, Page 7 – The increase in financial incentive for reuse programs is much appreciated.
- A. PAINT COLLECTION SITES, EVENTS, AND SERVICES, Page 8 - Paint-only collection events in rural areas have been helpful but more events are needed especially in underserved rural areas that have no ongoing HHW programs or limited or no retail collection.
- Latex Paint Processing & Oil-Based Paint Processing, Page 11 – It would be helpful to reference that these methods are quantified later in Section G on pages 22 & 23.
- Site Visits, Page 13 – It would be helpful to quantify the number of site visits conducted by PaintCare both by number of visits and percentage of drop-off sites.
- HHW Programs, Page 13 – PaintCare has been making slow in roads to providing programs in rural areas. There are still some underserved areas. In addition to the counties listed that have not joined PaintCare, Alpine County should be added. There is no permanent HHW program located in Alpine County. Alpine County relies on HHW programs in neighboring counties. Several other rural counties have utilized indirect PaintCare contracts though the chosen vendor for their Household Hazardous Waste (HHW) Collection events. Colusa County and Glenn County do not yet have ongoing HHW programs and rely on infrequent one-day HHW collection events. The infrequent nature of the HHW programs in these counties should not indicate that paint collection is established under this program. These counties also have no retail programs.
- Service Level, Page 15 – PaintCare indicates that the distribution goal of the program has been satisfied. The ESJPA has always expressed concern regarding this distribution analysis in that several rural areas remain underserved as indicated in a previous comment, Infrequent HHW events with limited or no local retail option does not provide a level of convenience satisfactory to those residents.
- Five-Year Projections, Page 28 – The Five projections are confusing. The report indicates that prices will increase 2.5% per year but total revenue is stagnant for years 4 through year 8. Total expenses increase about 11% per year. More explanation should be provided for this analysis.

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