



July 12, 2017

StopWaste is the Alameda County Waste Management Authority, the Alameda County Source Reduction and Recycling Board, and the Energy Council operating as one public agency.

CalRecycle

Delivered via email – mattresses@calrecycle.ca.gov

Subj.: Comments of the Mattress Recycling Council draft 2016 California Annual Report and proposed 2018 Program Budget

Dear CalRecycle:

Thank you for the opportunity to offer comments on the draft first annual report by the MRC on the California mattress stewardship program.

As an overall comment, I note that currently there are three participating mattress collection sites in Alameda County (pop. 1,645,359), all clustered near each other in the west-central area of the county. Two of the three are recyclers (DR3 and Blue Marble) and one, a small C&D transfer station, is a collection site only. There are no collection sites in the east, south or north areas of our county, and many heavily populated areas are 10+ miles from any of the current sites. None of the major MSW transfer stations or landfills are participating, regardless of whether they are privately owned and operated (Davis Street Transfer Station (WM), Fremont Transfer Station (BLT), Pleasanton Transfer Station (PGS), Vasco Road Landfill (Republic)) or publicly owned and operated (Berkeley Transfer Station), even though most of the transfer stations have been separating mattresses for recycling for many years. Gate charges for mattresses and box springs at these transfer stations range from \$14/unit (Berkeley, and \$14.62 ea. @Fremont Transfer Station) to \$21.70/each at WM's Davis Street Transfer Station. This lack of "free" collection sites in large urban areas combined with the relatively paltry bounty of \$3 per unit paid to consumers delivering up to five units per day per vehicle means that the program, at the end of the first year, has had virtually no perceptible impact on illegal dumping of mattresses in our area. Contra Costa County, to our north, currently has no collection locations.

Page by page comments:

p. 17, Section B.1. "MRC also pays some sites a reasonable amount for accepting, collecting, storing and handling the mattresses." I would argue that the amount offered has not been "reasonable" from the perspective that it has not persuaded any of the major solid waste facilities in our region to participate. These are the locations that people frequent to dispose of unwanted materials.

p. 28, Plan Objectives: "Establish a collection site or event in each county" and p. 29, "For these reasons, MRC proposes no changes to this goal." One site or event in each county is woefully inadequate. One collection site per 250,000 population, or one within a radius of 10 miles in urban areas, or something similar (along with some standard for hours per week that a site is open) would be a goal far more likely to have a meaningful impact.

Member Agencies:

- Alameda County
- Alameda
- Albany
- Berkeley
- Dublin
- Emeryville
- Fremont
- Hayward
- Livermore
- Newark
- Oakland
- Piedmont
- Pleasanton
- San Leandro
- Union City
- Castro Valley Sanitary District
- Oro Loma Sanitary District

p. 29, Plan Objectives: “Establish a consumer incentive to bring discarded mattresses to recyclers.” “MRC considers this (\$3 per unit drop-off incentive) to be successful and proposes no changes to this goal.” As stated previously, the amount this incentive payment and locations where it is offered has had little visible impact on illegal dumping of mattresses. In a pilot project grant that StopWaste awarded to DR3 in 2015, over six months one thousand illegally dumped mattresses around Alameda County were “tagged” with distinctive tamper proof sequentially numbered vinyl tags affixed with a metal “hog ring” and accompanied by a flyer offering a bounty ranging from \$6 (twin) to \$12 (king) for units returned to DR3. 727 of the 929 tagged units (78%) that were within 13 miles of DR3 were returned for the incentive payment, while only 20 of the 71 units (28%) that were 16-27 miles away were turned in. The clear conclusion was that “scavenging” behavior of illegally dumped units is quite sensitive to the amount of the bounty and the distance to the facility. The \$3 amount may be a “reward” to those planning to haul their own units to a recycling facility anyway, but it does not appear to be an “incentive” to third parties to clean up any abandoned mattresses they come across (and one sees them daily).

p. 32, Table of Materials Recycled: I believe the second line is supposed to be “Foam” not “Retail.” A very picayune point: The term “cardboard” is an imprecise label that is often used synonymously with “corrugated,” but not always. If the material referenced is non-corrugated, perhaps “paperboard” might be a better descriptor.

The Proposed 2018 Budget: If payments to collection sites were to increase to a level adequate to enlist the participation of most transfer stations in our area (or to entice other recycling businesses similarly situated to participate in lieu of the transfer stations), and if the incentive payment were to increase to a level adequate to actually incentivize collection of illegally dumped units by someone other than haulers or public works crews (who are out cleaning them up anyway), then the level of program expenditures necessary to produce an acceptable result may increase. It seems premature to propose lowering the fee when the current budget is not yet producing acceptable levels of convenience and incentive.

StopWaste continues to work to incorporate mattress collections into the one day HHW collection events held around Alameda County, wherever space and logistics permit. We look forward to working with the MRC, its partners, local jurisdictions and CalRecycle to develop an effective model mattress stewardship program in California.

Respectfully,



Tom Padia

Deputy Executive Director | StopWaste
1537 Webster St. | Oakland, CA 94612

p: (510) 891-6525 | f: (510) 893-2308