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

Caroll Mortensen
Director
CalRecycle
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Sacramento, CA 95812-4025

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Dear Ms. Mortensen,

Thank you for the opportunity to review the initial set of ideas and suggestions that Cal Recycle has proposed for achieving a statewide recycling goal of 75%. We find many of the proposals offered for discussion, progressive, far reaching and implementable. We are pleased that the document addresses many important issues for bringing the state to a 75% recycling rate.

We offer our strongest support for the proposed policy on phasing out the ability to count ADC, AIC and beneficial reuse as diversion. Our Agency has defined "deposited in landfill" as anything placed above the liner and below the final cover. We believe that material that has a higher and better use, such as organics, should not be deposited in landfill, and if it is, should be counted as disposal not diversion. Phasing out diversion credit for these materials will help support needed statewide infrastructure for organics processing facilities and help achieve multiple environmental goals, as increased amounts of compost are generated.

We are also supportive of many other items in the document including, most notably, the following:

- Organics and cardboard disposal ban and/or generator separation requirement
- Funding for organics and recycling infrastructure, secondary manufacturing and anaerobic digestion
- New way to measure 75%, acknowledging that the current baseline methodology is flawed and that using an average from 1990 through 2010 would be more representative than 2003-2006.
- Easing permitting barriers to new composting infrastructure
- Increasing MRF recovery performance standards via regulation
- Establishing an enforcement component of AB 341
- Establishing Regulations for EPR for specified products that would be added to over time
- Expansion of beverage container deposit program to include all beverages
- Greener products through product certifications/eco labels.

Sincerely,

Gary Wolf
Executive Director