



**City Council**  
311 Vernon Street  
Roseville, California 95678

June 7, 2012

Carroll Mortenson, Director  
California Department of Resources Recycling and Recovery (CalRecycle)  
1001 I Street  
P.O. Box 4025  
Sacramento, CA 95812-4025

Re: Comment letter on May 9, 2012 White Paper: *California's New Goal: 75% Recycling*

Dear Ms. Mortenson,

I wanted to express my appreciation for your leadership in starting this complex discussion among stakeholders on how the State of California can reach the newly established 75 percent goal, as established in Assembly Bill 341 (Chapter 476, Statutes of 2011), by 2020. The White Paper, *California's New Goal: 75% Recycling*, that you recently presented was very thoughtful and contained many promising policy and program concepts that can help reach the new goal.

As a community that cares about how we manage our locally generated solid waste and its impact on the environment, the City of Roseville wants to contribute to a constructive dialogue that helps CalRecycle develop policy recommendations to the Legislature that are technically feasible, fiscally sustainable and provide the greatest environmental benefit within the limited state and local resources that are available.

As presented, in addition to the attached comments to the White Paper, we wanted to articulate two key considerations that we feel will help create the best plan for California:

1. Develop the recycling market more and the rest will come – The City of Roseville feels that CalRecycle needs to put a significant focus on supporting, fostering and developing a robust recycling market, especially for materials that are currently not recyclable or hard to recycle and are a significant percentage of the waste stream. Roseville pulls from its own experience, in 2008, when it undertook an effort to offer EPS recycling to its residential and business customers. The popular program worked well in terms of overall supply of material, but where it fell short was the wholly inadequate private market to recycle the material into new products.

When the program began, under the California Integrated Waste Management Board, there was staff that assisted Roseville in locating new markets. As time went on, staff left CIWMB and was never replaced. CalRecycle needs to rebuild this critical capacity if it hopes to meet the new 75 percent goal. The City of Roseville believes that if a robust private market exists, that implementation of new recycling programs will naturally be

more financially sustainable and self-fulfilling through private market demand. As proposed several times in the White Paper, we believe tax breaks, technical assistance and incentives for new private recycling infrastructure will help develop a self-sustaining market demand for recyclable material.

2. State-mandated bans do not work unless the local infrastructure can accommodate it – The City of Roseville is especially concerned about over simplified bans submitted as policy options. Specifically *Policy Option 2b – Organics Disposal Phase-out* and *Policy Option 7f – Bans of Cardboard going into Landfills* are well intentioned on the surface and could be a policy option only if there is an adequate and sustainable infrastructure in place to accommodate these banned materials. Without laying the groundwork and merely establishing a statewide ban on landfilling, you will be setting up local governments and CalRecycle to fail in the actual implementation and meeting the desired result.

Additionally, with respect to organics recycling, clearly a growing option, it is key that CalRecycle take on a leadership role in coordinating and reviewing competing agency regulatory demands in the context of creating an environment where composting and digestion facilities can be built in California without excessive regulation and cost. Bringing together the State Water Resources Control Board, Department of Toxics Substance Control and the Air Resources Board together with CalRecycle to create a reasonable and consistent regulatory framework will help encourage the building of this infrastructure and create jobs for our state. Again, this will require leadership by CalRecycle and out of the box thinking to make it happen.

Again, the City of Roseville appreciates the opportunity to provide constructive feedback on the White Paper and looks forward to working with you on the new 75 percent goal. For specific questions on the attached comment form, please contact Sean Bigley in the City's Environmental Utilities Department at (916) 774-5513.

Sincerely,



Pauline Rocucci,  
Mayor

# California's New Goal: 75% Recycling

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**Public Review Comment Form**

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**Name:** Sean Bigley  
**Representing:** City of Roseville  
**Email:** sbigley@roseville.ca.us  
**Phone:** (916) 774-5513

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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**

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## **1. Increase Recycling Infrastructure**

### **1a. Funding for Infrastructure**

A consistent barrier to long-term success of any recycling effort is the lack of viable and reliable recycling content markets in California. Without a robust market development component lead by CalRecycle, much of the ideas presented in the white paper will be impossible to implement from a local standpoint.

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

Critical

Somewhat Useful

Irrelevant

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**1b. Regulatory Oversight**

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

Critical       Somewhat Useful       Irrelevant

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**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

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**1d. Modify RMDZ Program To Be Statewide**

RMDZ should also be revamped to become more user friendly.

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

Critical       Somewhat Useful       Irrelevant

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**1e. Increase Recycling Manufacturing Business Assistance**

Without robust private marketplaces that accept material for manufacture with recycled content, it will make it difficult to implement many of the ideas presented in this plan. Market development should be a priority for CalRecycle.

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

Critical       Somewhat Useful       Irrelevant

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**1f. Increase Collection Efficiency/Quality**

I would only implement this as a voluntary technical assistance program for those inefficient operators that may want the help.

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

- Critical       Somewhat Useful       Irrelevant

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**1g. Streamline Planning Documents**

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

- Critical       Somewhat Useful       Irrelevant

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**1h. Communications Outreach on Infrastructure**

Would recommend a focus on source reduction and buy recycled to both decrease waste generation and spur consumer interest in products made from recycled materials.

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

- Critical       Somewhat Useful       Irrelevant

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**1. What Did We Miss?**

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## 2. Organics

### 2a. Greenwaste ADC

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

Critical

Somewhat Useful

Irrelevant

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### 2b. Organics Disposal Phase-out

The City of Roseville feels that CalRecycle should ensure that energy projects or composting facilities exist in sufficient capacity before any statewide phase out of organics being landfilled.

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

Critical

Somewhat Useful

Irrelevant

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### 2c. Funding for Organics Infrastructure

Funding for permitting and capital costs are critical to helping spur local/private public investment in organics to energy facilities. As noted later, CalRecycle can take a leadership role in loosening air, water and waste regulations that are keeping more of these facilities from being built in California.

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

Critical

Somewhat Useful

Irrelevant

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### 2d. Indirect Incentives

These indirect incentives are helpful, but not taken alone.

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

Critical

Somewhat Useful

Irrelevant

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**2e. Regulatory Changes re: ADC, food, etc.**

CalRecycle needs to take a leadership role in spurring investment in infrastructure by working with environmental agencies in the Natural Resources Agency and Cal-EPA, specifically the California Air Resources Board and the State Water Resources Control Board.

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

- Critical       Somewhat Useful       Irrelevant

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**2f. Cross-Agency Regulatory Issues**

CalRecycle needs to take a leadership role in spurring investment in infrastructure by working with environmental agencies in the Natural Resources Agency and Cal-EPA, specifically the California Air Resources Board and the State Water Resources Control Board.

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

- Critical       Somewhat Useful       Irrelevant

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**2g. Biomethane Pipeline Issue**

The City of Roseville agrees with the recommendation presented in the white paper. Additionally, CalRecycle should endorse use of biomethane regardless of its source (in-state or out of state) as a matter of principle in the pursuit of opening up organics recycling infrastructure and markets.

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

- Critical       Somewhat Useful       Irrelevant

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**2. What Did We Miss?**

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### 3. Increase Commercial Recycling

#### 3a. Reduce Thresholds for Commercial Recycling

The City of Roseville has concerns over how this will impact the local governments in terms of the enforcement and public outreach workloads and cost increase. From the local government perspective, this would constitute an unfunded state mandate. Only implement if the cost to benefit is studied and results indicate it is a good +

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

- Critical       Somewhat Useful       Irrelevant

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#### 3b. Increase Requirements for MRF (Material Recovery Facility) Performance

The City of Roseville has concerns over how this will impact the local governments in terms of operational costs to the MRF's. From the local government perspective, this would constitute an unfunded state mandate. Only implement if the cost to benefit is studied and results indicate it is a good solution economically and +

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

- Critical       Somewhat Useful       Irrelevant

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#### 3c. Establish Business Enforcement Component

The City of Roseville has concerns over how this will impact the local businesses and economies in terms of increased business costs. If required to be implemented by local governments, this would constitute an unfunded state mandate. Only implement if the cost to benefit is studied and results indicate it is a good solution +

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

- Critical       Somewhat Useful       Irrelevant

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#### 3d. Grants for Multi-Family Recycling Programs

We believe a state monetary investment via grants will help greatly in reaching the statewide goal.

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

- Critical       Somewhat Useful       Irrelevant

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### 3e. Awards for Businesses

Nice to do, but not a priority.

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

- Critical       Somewhat Useful       Irrelevant

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### 3. What Did We Miss?

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## 4. Establish Extended Producer Responsibility

### 4a. Authority to Decide Products and Targets

In 2010, the Roseville City Council adopted Resolution 10-278 that supports the effort by the California Product Stewardship Council to work with CalRecycle and the Legislature to develop statewide product stewardship systems. It removes the cost and logistical burden off local governments and their ratepayers/taxpayers.

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

- Critical       Somewhat Useful       Irrelevant

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### 4b. Packaging

In 2010, the Roseville City Council adopted Resolution 10-278 that supports the effort by the California Product Stewardship Council to work with CalRecycle and the Legislature to develop statewide product stewardship systems. It removes the cost and logistical burden off local governments and their ratepayers/taxpayers.

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

- Critical       Somewhat Useful       Irrelevant

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#### 4. What Did We Miss?

EPR is a critical pathway, in our opinion, to reach the statewide goal.

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### 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

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#### 5b. Expansion of Minimum Content Requirements

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

- Critical       Somewhat Useful       Irrelevant

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#### 5c. Program Expansion of All Ready-to-Drink Beverages

This will provide a tangible benefit to the 'recycling' rate by incentivizing the capture of this material even before it reaches the trash bin.

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

- Critical       Somewhat Useful       Irrelevant
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**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

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**5e. Fiscal Reform to Provide More Funding**

We believe a state monetary investment will help greatly in reaching the statewide goal.

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

- Critical       Somewhat Useful       Irrelevant

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**5. What Did We Miss?**

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**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
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**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

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**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

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**6d. Minimum Content Requirements**

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

- Critical       Somewhat Useful       Irrelevant

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**6e. Sales Tax Breaks on Private Sector Purchase of RCPs/EPPs**

This will help spur demand for recycled content products in a productive way that relies on the private sector and the free-market desire to reduce costs and create more profit.

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

- Critical       Somewhat Useful       Irrelevant

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**6f. Financial Incentives for Manufacturer Use of Recycled Materials**

This will help spur demand for recycled content materials in a productive way that relies on the private sector and the free-market desire to reduce costs and create more profit.

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

- Critical       Somewhat Useful       Irrelevant

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**6. What Did We Miss?**

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**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

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**7b. Plastics**

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

- Critical       Somewhat Useful       Irrelevant

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**7c. E-Waste**

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

- Critical       Somewhat Useful       Irrelevant

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**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

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**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

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**7f. Fiber: Bans on Cardboard Going Into Landfills**

Bans do not work unless you have a private market to take the material, even if it is contaminated.

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

- Critical       Somewhat Useful       Irrelevant
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**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

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**7h. Used Oil LCA Follow-ups'**

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

- Critical       Somewhat Useful       Irrelevant

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**7. What Did We Miss?**

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**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
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**8b. Other Code-Level Ideas**

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

- Critical       Somewhat Useful       Irrelevant

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**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

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**8. What Did We Miss?**

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**9. Source Reduction****9a. Organics Food Programs, Backyard Composting, Vermicomposting**

Couple of useful focus areas could be technical assistance to farms, grocery stores. Could also work to help divert food to food pantries and kitchens. Also, providing more education grants to environmentally focused learning facilities to teach people how to vermicompost/compost will help with source reduction locally.

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

- Critical       Somewhat Useful       Irrelevant
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**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

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**9c. Promotion of Local Zero Waste Activities**

This concept is good intentioned, but way beyond most people to implement. This is a fairly advanced concept that is sought after by early adaptors, but not the general public. It should be pursued in the future, but not a priority now.

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

- Critical       Somewhat Useful       Irrelevant

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**9. What Did We Miss?**

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**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

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**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

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**10. What Did We Miss?**

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**General Comments**

The City of Roseville appreciates the opportunity to comment on this white paper. Overall, we feel the key areas of focus should be on market development, grant programs, private sector incentives, tax incentives and other programs that spur private investment, support market conditions that encourage recycling and waste reduction +

