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January 16, 2007

Margo Reid Brown, Chair
California Integrated Waste Management Board
1001 I Street
Sacramento, CA 95814

Dear Chair Brown,

I would like to commend the California Integrated Waste Management Board for its proposed Strategic Directives. The California Resource Recovery Association, a member organization representing over 500 state recyclers, completed a similar exercise in 2005; our Resource Management Act (RMA). The RMA was compiled with our nine technical councils, following three workshops, and final adoption by our entire membership. Both our documents are remarkably similar, both looking to achieve a Zero Waste California. Our Board would like to share the following comments on areas of mutual agreement between our documents and offer our support for the adoption of your Strategic Directives.

- The Board commits to “Introduce legislation by September 2008 to develop a timely and accurate compliance measurement system” (SD-3). This matches with the RMA recommendation (#3) for “consistent and reliable information and timely assistance to cities and counties.” Our members agree that an accurate measurement system is a key to local compliance. The RMA also suggests a standardized and improved numeric goal measurement techniques that allows cities and counties a program-based option to structure their resource management programs eliminating “paper” diversion” merely through accounting (RMA #1). When adopting your Strategic Directive, we encourage the Board to acknowledge “appropriateness, comprehensiveness, and effectiveness” as a consideration in tests for a community’s effort and compliance.
- In your SD-3, the Board proposes to “develop a full-cost accounting analysis to compare the costs and benefits of recycling, composting, technology, and landfills”. The CRRRA endorses this effort, and suggests including self-hauled construction, demolition, and landscape materials for special analysis. California’s recycling and composting infrastructure will flourish when self-hauled material (over 1/5 of current disposal) can be directed away from landfills. The RMA suggests banning construction, demolition, and organic materials from disposal as part of a comprehensive facilities network, relying on local markets from recovered materials products. (RMA #7, #9)

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- In SD-5 the Board introduces producer responsibility, a concept most welcomed by our membership. The RMA section “Plan before a Ban” addresses producer and consumer responsibility for universal waste, paint and other household hazardous materials, and construction, demolition, and organic materials. We also encourage statewide research and development to absorb California recovered resources as local manufactured products. (RMA #10, #11, #12, #18).
- Market development is the focus of SD-6, a core value that we also share. We both agree on the need for keeping organic resources out of landfills. In support of this goal the RMA proposes a comprehensive statewide network of compost facilities, critical link in supporting the ban. Local site designation, as part of the facilities network, would alleviate some of the recent problems in siting facilities. Participating resource recovery businesses should benefit from financial incentives such as, California equipment tax credits, other loan programs, job training and employment tax credits. Recycling market development, including “buy recycled”, should be central to California’s economic policy. It is time to create local markets for local resources, pulling materials into new products. (RMA #13, #14, #15, #16) On March 20th, the CRRA is sponsoring a policy workshop, in Sacramento, to discuss a landfill organics ban. I would like to invite your participation as an active participant in that discussion.
- CIWMB proposes to “encourage the development of alternative energy and bio-fuels” (SD-9). The RMA #21 calls for transparency in the use of conversion technologies. High-temperature energy recovery should be classified as transformation, and regulated accordingly. Precautionary principles should be applied to energy processes and renewable energy subsidies considered only for CT processes meeting the current legislative test of producing “no discharges of air contaminants or emissions; no discharges to surface or groundwater; and no hazardous wastes.” The CRRA membership overwhelmingly supports the stipulation that composting and recycling opportunities should not be sacrificed to energy recovery. Additionally, it is critical that any energy recovery conversion facility should only receive material after it has gone through a recycling and/or composting process.
- SD-12 proposes that CIWMB “Develop a certification program for recycling professionals in the public and private sectors by June 2008”. This mirrors our Board goal (RMA #26), at the behest of over 80% of our members, of establishing our CRRA Recycling Certification program. We have been working with the City of Los Angeles, UCLA, the CIWMB, and the California Resource Management Training Institute, and anticipate the program’s preview at our annual conference on July 29 through August 1, 2007, in San Pedro. Again, we would greatly appreciate any assistance you can give for a successful and much needed program.

Once again, the CRRA Board is encouraged by the idea of the formalized Strategic Directives and would like to voice our strong support of these efforts. Both of our organizations are interested in achieving a Zero Waste California and we look forward to whatever collaboration could help us reach that goal. Please feel free to contact me if you have any additional questions or we may be of any further assistance.

Sincerely,

Julie Muir

Julie Muir, President
California Resource Recovery Association

Cc: Rubia Packard, CIWMB, MS 25-A

Enc: CA Resource Recovery Association, Resource Management Act (RMA)