



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027

P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

January 4, 2017

Mr. John Ramirez
Director, Environmental Health Bureau
County of Monterey
1270 Natividad Road
Salinas, CA 93906

Dear Mr. Ramirez,

We are writing regarding the status of CalRecycle's most recent staff review of whether Monterey County is in compliance with AB 939 requirements, most importantly in terms of implementing diversion programs. After meeting with County staff in March 2015, February 2016, and again in October 2016, CalRecycle staff have identified several program areas that may become challenging and could impact the County's ability to continue to meet the AB 939 requirement in the 2012-2015 Jurisdiction Review cycle that is currently taking place. We wanted to bring these issues to your attention now so that these program areas receive adequate staff attention in the coming months. We understand that County staff is currently drafting a plan to address the program areas. CalRecycle staff would like to review the plan and the County's ability to address the program areas no later than February 28, 2017. Addressing these issues now will also help the County plan for adequate implementation of SB 1383.

A summary of the program areas include:

1. **Disposal Trends** – 2015 disposal increased 12.7% without any known cause. County staff or the hauler has not been able to explain the cause of the disposal increase. From hauler records, it appears to be attributed to the commercial sector. Also, from Disposal Reporting System (DRS) records, self-hauls (non-franchised tons) to Marina Landfill from generators within the County have increased from 34% of total disposal in 2012 to 40% in 2015. If this upwards trend in disposal is not reversed, the County could exceed its targeted per capita disposal rate of 7.2 pounds per person per day, risking compliance with AB 393 diversion goals of 50%.
2. **Commercial Recycling** – Trends in commercial recovery have decreased each year of the review cycle. (Tons disposed have increased while tons recovered for recycling have decreased in the curbside programs). The downward trends in recovery appear equally distributed in both service areas, MRWMD and SVSWA. Trends in direct outreach to businesses to comply with AB 341 (MCR) and AB 1826 (MORE) are also down. These trends raise concerns for continued program effectiveness at a time when commercial recovery and food waste recovery should be increasing, as well as education and outreach to businesses on MCR and MORE. CalRecycle encourages the County to dedicate adequate staff resources to conduct direct outreach to the commercial and industrial sectors in the County, and to provide adequate oversight of the franchised services. We also encourage the County to ensure that costs for commercial services act as a meaningful incentive for businesses to divert materials, including food waste collection services in support of MORE compliance.
3. **Construction and Demolition (C&D)** – While Building Services staff are confirming that C&D diversion is occurring during the building permit process with the use of CalGreen



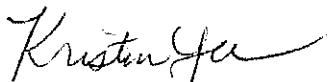
forms, there has been little coordination between the Building Services staff and the Environmental Health Bureau staff that oversee the recycling programs in regards to C&D diversion from building projects. CalRecycle encourages the County's Recycling Coordinator to provide the County Building Services staff with the following:

- A Waste Management Plan and Report specific to the County's own C&D Ordinance requirements and franchised hauling services; and
 - Educational materials on C&D diversion options and facilities.
4. **Government Source Reduction, Recycling, Composting and Procurement Programs** – While the County adopted the Go Green! Program policy and goals in 2011, there were no staff dedicated to implementing the program until mid-2015. Because of this, education to County staff on source reduction, recycling, composting and procurement programs was minimal, informal and decentralized during the review cycle. In early 2016, LAMD staff met with the full time Sustainability Coordinator that manages internal environmental programs and learned that implementation of the program and its policies had just begun. CalRecycle encourages the County to place an emphasis on staff resources to fully implement and coordinate the internal source reduction, recycling, composting and procurement programs for Monterey County facilities and staff.

Jill Larner, from CalRecycle's Local Assistance and Market Development Branch, will continue coordinating with County staff on these programs and monitoring the County's progress on maintaining effective commercial, C&D and internal government programs.

We are looking to the future and want to work with you to ensure the success of the County's diversion efforts. If you have any questions, please contact Jill Larner at 916-341-6525, or jill.larner@calrecycle.ca.gov.

Best Regards,



Kristin Yee, Central Section Manager
Materials Management and Local Assistance Division

cc:

Ric Encarnacion, Assistant Director, Environmental Health Bureau

Robert Durham, Supervisor, Recycling and Resource Recovery Services, Monterey County Environmental Health

Stephanie Luna, Recycling and Resource Recovery Specialist, Monterey County Environmental Health

Melissa Vargas, Central Supervisor, Materials Management and Local Assistance Division

Jill Larner, Environmental Scientist, Materials Management and Local Assistance Division