



July 30, 2012

Ms. Caroll Mortensen
Executive Director, CalRecycle
1001 I Street
Sacramento, CA 95814

RE: Comments on the Beverage Container Recycling Program Reform

Dear Ms. Mortensen,

I am writing on behalf of Recology in response to the request for comments on CalRecycle's proposed changes to the Beverage Container Recycling Program. We would like to thank you and your staff for the time and effort put into these proposed changes and for the opportunity to comment throughout the process.

First, we would like to request more time to discuss these proposed reforms. More workshops and opportunities to better understand the proposed changes as well as the current state of the program are necessary before any large policy changes take place. More time and opportunities for open discussion with the Department will allow the stakeholders to fully grasp the path CalRecycle is taking and be able to provide valuable insight and comment to reform the beverage container program in the best way for the state.

Although CalRecycle has great internal auditors on staff, we would also like to propose that CalRecycle contract with a third party economist to perform an audit and/or review of the beverage container recycling program. Having a third party economist perform these activities will allow for CalRecycle staff and all interested stakeholders to clearly see where the program currently sits as well as what would be the effects of the proposed changes and/or expansion to the program.

Again thank you for the opportunity to comment and if you or staff have any questions or would like further information please feel free to contact me at roster@recology.com or (415) 613-0438.

Sincerely,

Rachel Oster
Director of External Affairs
Recology

Cc: John Halligan, Acting Deputy Director Recycling