



November 4, 2019

City of Long Beach LSWMP Comments,
City of Long Beach Department of Public Works
1 West Chester Street, 4th Floor
Long Beach, NY 11561
cc: NYS DEC Division of Materials Management

We stand with the City of Long Beach to enhance recycling going forward, vastly increase participation, provide FULL education and outreach, and once that is in place also enforce compliance, which must be a priority.

Some questions:

Why does recycling have to be cheaper than trash? People realize the value to our environment is worth it and value should be a consideration in all decisions. Maybe trash is too expensive.

Why is the City waiting until after the submission of the plan to deal in the coming changes to recycling? It was unfortunate that the City said at the hearing in response to that question that there was nothing being discussed. It forced residents to demand answers, and you had to answer questions anyway about the potentials. **JUST BE OPEN!**

What have we seen in other places that recycling has changed? The contractors have either abruptly changed / decreased the program, or did not honor the contracts leading to problems. The Plan says the contract will be honored for their term (through Dec 31, 2020) but we're not sure this won't change before.

Since there is no plan written for any potential recycling changes, we are broaching each of these subjects as potential problems we need to avoid:

Single, Dual stream and contaminants

Switching from single stream to dual stream will require a significant public education campaign, manpower and political will. If like other towns, the plastic must be cleaned and stripped of any and all labels or it could be considered "contaminated" and sent for trash instead, the City must be ready in partnership with residents. If people have to sort it all, that can cause even less to be recycled or even incentivize people to not bother to recycle. We must keep this loss of compliance in mind which will increase our higher cost on trash disposal.

We cannot allow changing to collecting items less than weekly.

1. It increases chances for items to blow away and become litter and pollution from people's bins.
2. It decreases people's habits and can create overflow of bins or failure to put out, also potential for litter.

We must have clarity on paper goods.

- 1) Will we lose mixed paper collection?
- 2) If those become trash. What is the higher cost? Plan says largest recycling material.



The City must make a commitment to education and awareness campaign of any changes

1. To keep people recycling rather than just throwing things out (how is that cheaper?)
2. To stop the public from making mistakes that could lead to what they thought were items that would be recycled to becoming trash. If those “contaminated” lots of recyclables are sent to be burned, we are merely increasing climate change gasses when the public thought they were helping
3. Need full public education, not a flyer or 2, not “look at the website.” To this end we support grant proposals to do this and to assure the funds are expended in the manner described in the proposal
4. If there are restrictions, they must be crystal clear what they are so that people can comply
5. Restrictions should be easiest possible to comply with, for maximum participation
6. If those are done as the City’s true due diligence on education, enforcement must also assure compliance.
7. Regardless of outside funding, the City has a responsibility to do all of this

Glass recycling and collection-

1. Must be clear if to be recycled or be trash
2. If trash, the City should just collect it rather than create an underclass of people flouting the law. Will likely just be thrown away anyway by those who don’t care
3. if recycled, the City must make multiple, convenient, localized drop off areas for maximum participation
4. If it would become a contaminant in peoples’ bins, The City must consider the costs of NOT recycling it to the costs of trash and recycling lost because it is “contaminated”
5. Why it can’t be picked up with the others we are not sure. Why can plastic and metal be separated from each other in the same bin, but not glass? For 20 years we had the pickup team separating them

Continuation/Discontinuation of plastic recycling by type or Number

1. must provide clarity on #1 and #2 use
2. must define all other acceptable or unacceptable numbers clearly
3. must be clear on any new restrictions-ie,
 - a. completely clean of food
 - b. all stickers and labels removed etc.
 - c. if one item is not clean or correct does ALL in bin go to trash as “contaminated”
 - d. or any other facet that could send a recyclable item to trash
 - e. and if sent to be burned, note the climate change gasses involved instead of helping the environment
4. The City should voluntarily educate the public on the amount of recycling that goes to trash annually

Restrictions must avoid a conflict of interest in that the receiver of the trash may want more trash to be burned and NOT RECYCLED and can be the arbiter of what is “contaminated” or not. There must be a check and balance on this decision-making process removed from a profit motive.



Prior notice, community input, and updating the public

1. When the exact changes are known, whether the City has to by law or not, the coming proposals must be made public PRIOR to any contracts signed or changes are decided upon with input sought from the public
2. The City must be open and transparent about the choices as there are conflicting needs
3. The City must also undertake an effort to demand a statewide plan to help The City better deal with this looming recycling and waste crisis in ways the City alone cannot

All Our Energy support AND URGE THE CITY to work with us to help push STATEWIDE proposals to address this problem that would:

- 1) Ban any single use and packaging items that are not easily recyclable
- 2) Create markets for recycled materials by setting mandatory minimum recycled content in every item meaning manufacturers need to buy and use recycled goods, not ignore them in favor of raw materials
- 3) Create manufacturer responsibility for reducing and recycling the waste they create
- 4) Foster creation of in-state recycling facilities to supply the recycled materials' markets these policies would create, which could create many jobs in the state that leads the way

Other considerations:

In future, the City MUST do more to ensure transparent community outreach, inclusion, and involvement for all required hearings and public meetings. Simply posting an important hearing on the City's website is not enough. Additionally, having said that the city would notify myself of the pending date of the hearing, then did not, and then did not reply to my follow up email asking what was happening for nearly another lost week of the comment period, was not good governance. In the future the City must directly notify all civic, community, environmental plus other groups that so choose.

We advise caution of pay as you throw initiatives which can lead to illegal dumping. Right now a problem is that the municipality is responsible and pays to get rid of waste, instead of the people who are creating it or using it. Instead, everybody else pays. Without a front end "deposit" or tax on these materials, which could be complicated, we are not clear on a pay-to-trash method.

The City must issue an RFP for what the CITY wants, not what the contractors want. Other municipalities have different programs and contractors. With contracts ending in the next 13 months, this should go out for RFP in a transparent manner. We should be looking to others who are leading and find out what they are doing and how.

Thank You,

George Povall
Executive Director
All Our Energy