

Jesse Medlong

The two most critical issues for the success of a bottle-deposit program to me, as a former California resident and as someone who now lives in rural Clallam County, are that (1) exceptions to collection-site requirements be limited to avoid extensive opt outs and (2) creative efforts are undertaken to ensure rural access.

In California, businesses that are required to maintain collection sites face fines that are insufficient to deter noncompliance. The effect is that, despite having a state-wide deposit-redemption program, most "mandatory" collection sites simply opt out rather than comply. It is difficult to find a site that does accept returns and, where they can be found, they often have very specific hours dictated by the availability of personnel to manually accept the returns. There is thus a small informal economy around collection and deposit, but access to it for most individuals and households is essentially nonexistent. Mandates and penalties should be designed to ensure actual meaningful access. This could include escalating penalties for frequent violators and (for businesses meeting certain size thresholds, for instance) requirements to operate automatic collection machines or to accept returns during all or most business hours.

Further, as a rural resident, I already choose between expensive curbside pickup or taking our household waste to a transfer station periodically. A program that serves rural residents well will require (1) refunds or credits on curbside waste-collection bills for the collection of redeemable containers and (2) transfer stations and landfills to accept redeemable containers and provide deposits on site.

Other creative solutions are likely out there, and I would encourage the use of townhalls and even competitive school projects to get fresh ideas that might not be forthcoming in more traditional stakeholder engagement methods like notice and comment. If more pointed discussion of this possibility would actually be considered, I would encourage Ecology to dedicate a workstream to collecting innovative and experimental ideas that might set the program ahead of its predecessors in other states.