



*Premier Recycle Company  
348 Phelan Avenue  
San Jose, California 95112*

*Phone 408-297-7910  
Fax 408-297-7915  
www.premierrecycle.com*

12/7/2020

To the San Francisco Board of Supervisors,

I wanted to express gratitude that the City has taken interest in our industry. The City's approach to C&D Recycling has been an extremely successful endeavor that should be a model to every other city in the nation. The efforts made to capture as much recycling material at the facility level by requiring 3<sup>rd</sup> party certification, has stood out as one of the single best decisions a large jurisdiction has made. We support the decision to tackle the issue of unpermitted C&D haulers that fall through the cracks of the current system.

Premier Recycle Company has been a valued member of both the Registered Transporter and the Registered Facility programs since its inception in 2006. Our facility was one of the first in the nation to be certified by the Recycling Certification Institute, the highest achievement that a facility like ours can strive for. We are audited for accuracy and truth in reporting. We share the City's goals of pushing the standard of recycling toward excellence, and I have personally worked with staff for many years to provide an industry perspective and show how regulation works in the real world.

As a recycler in the program, Board of Directors member of the Construction and Demolition Recycling Association, and Legislative Committee Chair for the CDRA, I think the proposed legislation is 95% of the way there. The proposed amendment to Section 1403 for unlimited transferable permits will gain our 100% support behind this measure.

I would like to highlight that the new tiered hauler permit system is intended to capture the C&D that escapes the current system. The lowest tiers (1 & 2) capture the haulers who have been operating under C&D permits, while truly being junk haulers. Many of these trucks do not send material to permitted facilities, but rather follow the cheapest path of least resistance. Much of this either goes to non-recycler transfer facilities or straight to landfill. This measure will have them decide to either operate within the C&D program or express the real business model as junk haulers. We support their full inclusion into the program, as this helps to level the playing field of those companies operating correctly.

Thank you again for your time, consideration, and support for our industry. I greatly appreciate it.

Brock Hill  
Vice President  
Premier Recycle Company

brock@premierrecycle.com  
408-297-7910

**From:** [Jo Coffey](#)  
**To:** [Major, Erica \(BOS\)](#)  
**Cc:** [Board of Supervisors, \(BOS\)](#); [Preston, Dean \(BOS\)](#); [Peskin, Aaron \(BOS\)](#); [Safai, Ahsha \(BOS\)](#)  
**Subject:** Comment re: Construction and Demolition Debris Recovery (File 201151)  
**Date:** Monday, December 7, 2020 11:41:30 AM

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This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use and Transportation Committee,

I am a San Francisco resident (District 11), speaking on the Construction and Demolition Debris Recovery ordinance (File 201151).

First, I want to thank Supervisors Safai and Walton for introducing this ordinance aimed at regulating demolition and construction waste.

I'm writing because I think the ordinance could be improved by adding these amendments:

1. Create community/local job requirements that must be met by transporters and facilities as defined in the ordinance;
2. Add a carbon and air quality impact fee starting at \$62 per ton (tied to the social cost of carbon, indexed for inflation) of landfilled waste, and redistribute proceeds to air and climate pollution mitigation measures directly benefiting communities impacted by demolition.

These amendments would help reduce carbon emissions and construction and demolition debris through incentivizing reuse of carbon intensive material. They would also provide community jobs and benefits on the order of \$10 million per year in funds for air and climate mitigation to impacted residents based on the ordinance's existing estimate of landfilled and incinerated debris.

As you well know, [75% of new development is slated for the Southeast corridor](#) in San Francisco, an area historically overburdened by poor air quality and environmental toxins. The impact fees generated by the proposed amendments, if reinvested in those communities, can help address historic damages and mitigate ongoing and future environmental impacts. For example, the fees could support weatherization and energy efficiency efforts, the electrification of home appliances to reduce indoor and outdoor air pollution attributable to methane combustion and leakage, and the expansion of EV charging infrastructure, among myriad other climate-positive initiatives that should be determined in consultation with local communities and community groups. At the same time, job requirements in those areas would provide economic opportunities in regions experiencing significant gentrification and displacement. This is particularly important. I live in the Southeast corridor, and I think the City should be taking all available measures to prevent the displacement of community people - the gentrification - that has been an unfortunate by-product of too many city building projects.

As well as funding climate-related local initiatives, the impact fee will also serve as an incentive to divert debris above the ordinance's requirement of 75%. This is crucial, since the

embodied carbon (i.e. the carbon dioxide emitted in creating the material) of debris is not included in our emissions inventory but is staggeringly high. [Cement and steel, for example, each have an embodied carbon content of about 1 ton per ton of material.](#) Other materials vary, but with cement as an estimate, the 1.5 million tons of debris generated annually in San Francisco would add up to 25% to San Francisco's greenhouse gas emissions if included in its city-wide inventory. We need to seriously consider the impact of our consumption, and adding an impact fee to this ordinance would be a major step in the right direction.

As members of the Board of Supervisors, you have a major opportunity to address key concerns around equity and climate through this ordinance. Please include the recommended amendments.

Thank you.

Jo Coffey

**From:** [Karen Kirschling](#)  
**To:** [Major, Erica \(BOS\)](#); [Board of Supervisors, \(BOS\)](#); [Preston, Dean \(BOS\)](#); [Peskin, Aaron \(BOS\)](#); [Safai, Ahsha \(BOS\)](#)  
**Subject:** Comment re: Construction and Demolition Debris Recovery (File 201151)  
**Date:** Sunday, December 6, 2020 4:34:37 PM

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of the Land Use and Transportation Committee,

I am writing as a San Francisco resident recommending amendments to the Construction and Demolition Debris Recovery ordinance (File 201151).

The ordinance as written (Version 1) takes incremental steps towards reducing waste through establishing a permitting process and increasing the required percentage of diverted materials. However, as currently drafted, the ordinance does not maximize opportunities to improve equity, and it stops short of mitigating the climate and air quality impacts attributable to unrecovered landfill residuals.

In order to address these deficiencies, we ask that you amend the ordinance as follows:

1. Create community/local job requirements that must be met by transporters and facilities as defined in the ordinance;
2. Add a carbon and air quality impact fee starting at \$62 per ton (tied to the social cost of carbon, indexed for inflation) of landfilled waste, and redistribute proceeds to air and climate pollution mitigation measures directly benefiting communities impacted by demolition.

These amendments would help reduce carbon emissions and construction and demolition debris through incentivizing reuse of carbon intensive material. They would also provide community jobs and benefits on the order of \$10 million per year in funds for air and climate mitigation to impacted residents based on the ordinance's existing estimate of landfilled and incinerated debris.

As you well know, 75% of new development is slated for the Southeast corridor in San Francisco, an area historically overburdened by poor air quality and environmental toxins. The impact fees generated by the proposed amendments, if reinvested in those communities, can help address historic damages and mitigate ongoing and future environmental impacts. For example, the fees could support weatherization and energy efficiency efforts, the electrification of home appliances to reduce indoor and outdoor air pollution attributable to methane combustion and leakage, and the expansion of EV charging infrastructure, among myriad other climate-positive initiatives that should be determined in consultation with local communities and community groups. At the same time, job requirements in those areas would provide economic opportunities in regions experiencing significant gentrification and displacement.

As well as funding climate-related local initiatives, the impact fee will also serve as an incentive to divert debris above the ordinance's requirement of 75%. This is crucial, since the embodied carbon (i.e. the carbon dioxide emitted in creating the material) of debris is not included in our emissions inventory but is staggeringly high. Cement and steel, for example, each have an embodied carbon content of about 1 ton per ton of material. Other materials vary, but with cement as an estimate, the 1.5 million tons of debris generated annually in San Francisco would add up to 25% to San Francisco's greenhouse gas emissions if included in its city-wide inventory. We need to seriously consider the impact of our consumption, and adding an impact fee to this ordinance would be a major step in the right direction.

As members of the Board of Supervisors, you have a major opportunity to address key concerns around equity and climate through this ordinance. Please include the recommended amendments.

Thank you.

Karen Kirschling  
kumasong@excite.com  
633 Oak  
SF, California 94117

**From:** [SF Climate Emergency Coalition](#)  
**To:** [Major, Erica \(BOS\)](#)  
**Cc:** [Board of Supervisors \(BOS\)](#); [Safai, Ahsha \(BOS\)](#); [Morris, Geoffrea \(BOS\)](#); [Peskin, Aaron \(BOS\)](#); [Hepner, Lee \(BOS\)](#); [Preston, Dean \(BOS\)](#); [Smeallie, Kyle \(BOS\)](#)  
**Subject:** Comment re: Construction and Demolition Debris Recovery (File 201151)  
**Date:** Monday, December 7, 2020 8:46:51 AM  
**Attachments:** [C&D Debris Org Letter - SFCEC.pdf](#)

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Dear Clerk Major and Members of the Land Use and Transportation Committee,

Please see the attached letter for our comment on the Construction and Demolition Debris Recovery (File 201151) ordinance.

Sincerely,

Daniel Tahara  
San Francisco Climate Emergency Coalition



[Website](#) | [Twitter](#)



Erica Major  
[erica.major@sfgov.org](mailto:erica.major@sfgov.org)

Comment re: Construction and Demolition Debris Recovery (File 201151)

Dear Members of the Land Use and Transportation Committee:

I am writing on behalf of the San Francisco Climate Emergency Coalition recommending amendments to the [Construction and Demolition Debris Recovery ordinance](#) (File 201151). The ordinance as written (Version 1) takes incremental steps towards reducing waste through establishing a permitting process and increasing the required percentage of diverted materials. However, as currently drafted, the ordinance does not maximize opportunities to improve equity, and it stops short of mitigating the climate and air quality impacts attributable to unrecovered landfill residuals.

In order to address these deficiencies, we ask that you amend the ordinance as follows:

1. Create community/local job requirements that must be met by *transporters* and *facilities* as defined in the ordinance;
2. Add a carbon and air quality impact fee starting at \$62 per ton (tied to the social cost of carbon, indexed for inflation) of landfilled waste, and redistribute proceeds to air and climate pollution mitigation measures directly benefiting communities impacted by demolition.

These amendments would help reduce carbon emissions and construction and demolition debris by incentivizing reuse of carbon intensive material. They would also provide community jobs and benefits on the order of \$10 million per year in funds for air and climate mitigation to impacted residents based on the ordinance's existing estimate of landfilled and incinerated debris. The ordinance should not move forward until these amendments are added.

As you well know, [75% of new development is slated for the Southeast corridor](#) in San Francisco, an area historically overburdened by poor air quality and environmental toxins. The impact fees generated by the proposed amendments, if reinvested in those communities, can help address historic damages and mitigate ongoing and future environmental impacts. For example, the fees could support weatherization and energy efficiency efforts, the electrification of home appliances to reduce indoor and outdoor air pollution attributable to methane combustion and leakage, and the expansion of EV charging infrastructure, among myriad other climate-positive initiatives that should be determined in consultation with local communities and community groups. At the same time, job requirements in those areas would provide economic opportunities in regions experiencing significant gentrification and displacement.



As well as funding climate-related local initiatives, the impact fee will also serve as an incentive to divert debris above the ordinance's requirement of 75%. This is crucial, since the embodied carbon (i.e. the carbon dioxide emitted in creating the material) of debris is not included in our emissions inventory but is staggeringly high. [Cement and steel, for example, each have an embodied carbon content of about 1 ton per ton of material!](#) Other materials vary, but with cement as an estimate, the 150,000 tons of debris landfilled annually in San Francisco would add up to 3% to [San Francisco's greenhouse gas emissions](#) if included in its city-wide inventory, not to mention that of the virgin materials involved in new construction. We need to seriously consider the impact of our consumption, and adding an impact fee to this ordinance would be a major step in the right direction.

As members of the Board of Supervisors, you have a major opportunity to address key concerns around equity and climate through this ordinance. Please include the recommended amendments.

Sincerely,

San Francisco Climate Emergency Coalition

CC: [Board.of.Supervisors@sfgov.org](mailto:Board.of.Supervisors@sfgov.org)  
[Dean.Preston@sfgov.org](mailto:Dean.Preston@sfgov.org)  
[Aaron.Peskin@sfgov.org](mailto:Aaron.Peskin@sfgov.org)  
[Ahsha.Safai@sfgov.org](mailto:Ahsha.Safai@sfgov.org)