



SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

November 10, 2022

City of San Mateo City Clerk's Office  
330 West 20th Avenue,  
San Mateo, CA 94403  
Via email to: [clerk@cityofsanmateo.org](mailto:clerk@cityofsanmateo.org)

RE: Nov 21st proposed rate increase

Dear City Clerk,

The Sierra Club Loma Prieta Chapter is an environmental organization that works to protect natural resources and promote the enjoyment of nature. We appreciate the opportunity to comment on the City of San Mateo's 2023 Proposed Solid Waste Rates increase. The project proposes compression of the current tiered rates. Compressed rates shift the cost of irresponsible consumption to frugal rate payers. The environmentally preferred alternative would be to increase the difference between tiered rates, increase tipping fees at the Ox Mountain Landfill and use cameras to deter illegal dumping. Please find our comments below.

a. Pay As You Throw: Change behavior with pricing. Cities currently use tiered rates, but they should increase the difference between the tiered rates to encourage conservation. Pay as you throw rates encourage conserving consumers behavior by increasing prices as volumes increase. Waste managers already have such a system in place in different sized cans- the prices should rise dramatically to offset the need for greenhouse gas generation, air and water table polluting landfills, and reduced diesel-based hauling. "Pay-as-you-throw schemes can be set up for businesses and households as a charge for different waste streams."<sup>1</sup> Consumers are already familiar with effective tiered rates through CalWater.

b. Increase tipping rates: Another feasible option which also generates additional revenue is to advocate for increased tipping rates through your representation as solid waste managers of Ox Mountain Landfill. If rates were around \$300, ten times higher than current tipping rates, the county would be able to aid the formation of recycling business to reclaim resources in the waste stream. As explained by CalRecycle, "A local tipping fee can act as an incentive to encourage certain practices or a disincentive to

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<https://www.ebrdgreencities.com/policy-tool/category/waste/price-signals-and-funding/>

discourage other practices.<sup>2</sup> Advocacy groups say, “To help reduce landfilling and to incentivize waste sorting at source, differentiated gate fees for sorted and mixed waste at the landfill can be introduced. This requires weight-based tipping fees and increased control.”<sup>3</sup>

c. Increase camera monitoring to prevent illegal dumping. A common excuse for not increasing rates is that people will just dump illegally. However today with camera monitoring this problem is easy to solve. Most of the Caltrans freeways now have cameras related to FasTrak purchased access toll lanes and Foster City monitors its gateways<sup>4</sup>. Cities can increase their monitoring of trash movement by adding cameras at the few exits in their jurisdictions. Cameras can be purchased with pay as you throw pricing systems. Many homes now have cameras that police access to solve burglaries which can be similarly utilized to monitor trash movement. In additions there are mobile stand-alone battery cameras that be deployed in more remote places.<sup>5</sup> In addition cities are making deals with business to increase the effectiveness of camera monitoring<sup>6</sup>.

d. Greenhouse gases increase primarily from organics decomposing in the landfill.<sup>7</sup> However state law SB1383 requires organics to be out of landfill.<sup>8</sup> Feasible mitigations should be targeted to accomplish organic reduction from waste stream and pay for programs such as local compost and home gardens to reduce waste streams. Organics found in the black or blue bin should be fined<sup>9</sup>.

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2 <https://calrecycle.ca.gov/LGCentral/Funding/>

3 <https://www.ebrdgreencities.com/policy-tool/category/waste/price-signals-and-funding/>

4 [https://www.smdailyjournal.com/news/local/cameras-are-helping-foster-city-with-crime-police/article\\_5b560218-3272-11ed-ac20-d79960f25239.html](https://www.smdailyjournal.com/news/local/cameras-are-helping-foster-city-with-crime-police/article_5b560218-3272-11ed-ac20-d79960f25239.html)

5 <https://www.proschoice.com.au/collections/illegal-dumping-surveillance-cameras>

6 <https://www.bloomberg.com/news/articles/2022-08-25/houston-mandatory-security-camera-law-raises-surveillance-fears>

7 <https://www.epa.gov/lmop/basic-information-about-landfill-gas>

8 <https://www.sierraclub.org/sierra/policymakers-race-curb-edible-waste>

9 [https://www.npr.org/sections/thetwo-way/2009/06/improper\\_recycling\\_will\\_get\\_yo.html](https://www.npr.org/sections/thetwo-way/2009/06/improper_recycling_will_get_yo.html)

e. Affluent household throw away more and consume more<sup>10</sup> than low-income houses and that causes much bigger environmental impacts<sup>11</sup>. The proposed rate structure is unfair to responsible consumers and low-income residents.

Frugal customers of the solid waste system work very hard to minimize their waste. The project proposes additional compression of the tiered rates. Rates will increase marginally for those households who have massive garbage cans but small garbage can subscribers will see an increase in rates of 20%. Large throwers will see an increase of 2% for residential and zero percent for commercial. Is that fair? Compressing rate differences shift the cost of irresponsible consumption to frugal rate payers.

Scheduling rate hearing just before Thanksgiving is a tried-and-true method of suppressing public comment. Please shift your rate hearing to early January when people are done with putting their presents, wrappings, and decorations in the trash and can take time out to address the rate increase.

Conclusion: The environmentally preferred alternative would be to increase the difference between tiered rates and increase tipping fees at the Ox Mountain Landfill with cameras to deter illegal dumping. Pay as you throw, increased tipping fees and cameras are part of a comprehensive program rate structure meant to reduce pollution and waste management in a way that will drive meaningful reductions. Please use a pricing structure similar to CalWater.

Regards,



Gladwyn d'Souza  
Conservation Committee Chair  
Sierra Club Loma Prieta Chapter

Cc: James Eggers  
Executive Director  
Sierra Club Loma Prieta Chapter

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10

<https://www.nytimes.com/1998/09/13/world/most-consuming-more-and-the-rich-much-more.html>

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<https://www.vox.com/energy-and-environment/2020/3/20/21184814/climate-change-energy-income-inequality> and <https://www.dailymail.co.uk/sciencetech/article-8153583/Wealthiest-10-percent-world-consume-187-times-fossil-fuels-poorest-10-percent.html>