



May 13, 2017

Mayor Tim Sandoval
and City Council Members City of Pomona
505 South Gary Avenue,
Pomona, CA 91766

Re: Proposed Code Amendment to prohibit new waste
and recycling facilities. Planning Commission Hearing
April 26, 2017.

Dear Mayor Sandoval and City Council Members.

On behalf of the Institute of Scrap Recycling Industries, Inc. ("ISRI"), West Coast Chapter representing the state of California, I am writing to express our concern about the proposed code amendment to prohibit new waste and recycling facilities in the city of Pomona that was passed by the Planning Commission for consideration by the City Council.

ISRI is the trade association that represents private sector companies that process, broker and industrially consume recycled commodities including metals, paper, plastics, glass, textiles, rubber and electronics at more than 5,000 of U.S. facilities. In Pomona, the recycling industry supplies more than 280 jobs with cumulative wages of more than \$21 million. (See attached).

Metal is the most recycled material in the United States and worldwide. Domestic and foreign steel mills, foundries, and other industrial consumers rely on recycled metal as a vital, environmentally-friendly and cost-efficient raw material for the production of new steel and cast iron products. For example, more than 60 percent of the U.S. Steel manufacturing industry is supplied by recycled metal. Unlike organic waste, metals such as aluminum, copper, lead, nickel, tin, zinc and others, are among the few materials that do not degrade or lose their chemical or physical properties in the recycling process. As a result, these metals have the capacity to be recycled an infinite number of times. A material like this that is traded on global commodity markets with values approaching more than \$90 billion annually is clearly NOT WASTE.

When using recycled metal rather than virgin materials in the production of iron and steel, CO2 emissions are reduced by 58 percent. This fact is important not only to the local community but to the global community. All communities need to play a part in environmental stewardship and participate in all types of recycling. Prohibiting recycling in any community is not only a breach of that community's obligation to protect our environment but it sets a very dangerous precedent.

The California legislature made it very clear in AB 341 that Californians recognize the importance of recycling. Indeed, even the city's task force recognizes the need to recycle. Recycling in each community is

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necessary to achieve the diversion from landfills. While we agree that regulations promoting safety and health in the recycling industry are appropriate, safety and health is not improved by limiting the amount of recycling in the city limits.

Finally, we have serious concern about how the ordinance treats recyclers that already have vested rights to operate. Scrap recycling is a \$117 billion industry in the United States that annually transforms more than 135 million metric tons of obsolete materials from consumers, businesses, and manufacturers into useful raw materials that are essential to the manufacturing of new products. The scrap industry's knowledge, investments, research and expertise makes recycling possible. Recyclers in Pomona have invested a significant amount of resources to create valuable businesses based on rights given to them by the city. The technology in recycling is ever changing by improving not only the efficiency of recycling but also the health and safety aspects of recycling. Restricting a recycling operation as a nonconforming use unduly restricts and inhibits a recycler from purchasing new technology.

On behalf of our members, the West Coast Chapter of ISRI in California, we respectfully request that you not adopt the code amendment and instead consider other ways to regulate and enforce the health and safety concerns.

ISRI and its membership look forward to working with the planning commission moving forward. If you have any questions, please do not hesitate to contact me or ISRI's staff representative Danielle Waterfield at DanielleWaterfield@ISRI.org or (202) 662-8516.

Sincerely,

Robb Cohn

President, ISRI West Coast Chapter
Institute of Scrap Recycling Industries (ISRI)



The Economic Impact of the Scrap Recycling Industry in
Pomona

	TOTAL
Jobs Supported	280
Wages	\$21,743,900
Economic Impact	\$68,839,600

THE POMONA SCRAP RECYCLING INDUSTRY

THE SCRAP RECYCLING INDUSTRY
CREATES JOBS IN POMONA, CA

- As the first link in the manufacturing supply chain, the scrap recycling industry plays a prominent role as a job creator, economic leader, major exporter, and environmental steward.
- There are an estimated 280 jobs (FTE) supported by the recycling industry in the city that pay average wages and benefits of \$77,700.
- In addition, the scrap recycling industry in California accounts for \$1.57 billion in federal, state and local taxes.
- More than 130 million metric tons of scrap are recycled in the United States each year, providing vital raw materials to U.S. manufacturers and helping to fuel global growth.

SCRAP RECYCLING: A GREEN INDUSTRY
WITH A LARGE ECONOMIC IMPACT

- Recognized as one of the world's first green industries, scrap recycling reduces the need to deplete our natural resources, produces significant energy savings, and reduces the amount of material being sent to landfill.
- The scrap recycling industry's **TOTAL ECONOMIC IMPACT IN POMONA IS \$68.84 MILLION.**
- When all scrap materials are taken into account, the scrap recycling industry accounts for 0.44 percent of California's total economic activity.
- Scrap recycling in the United States annually saves the CO₂ equivalent of 410 million tons of greenhouse gas emissions, according to EPA estimates.