

Responsiveness Summary
Iowa Administrative Code 567–Chapter 107
“Independent Redemption Center Grants Program”

This is a summary of the comments received by the Department of Natural Resources during the Public Comment period and the oral comments provided at the Public Hearing held on August 19, 2008 at 2:00 P.M. at the Wallace Building in Des Moines.

Comments not pertaining to the Administrative Rules have not been included. People representing their respective organizations who took part in the Public Comment period:

ATTENDED THE 8/19/08 PUBLIC HEARING - * PROVIDED ORAL COMMENTS	
Ralph* & Vicki* Kincer	RVK Redemption; Sheldon, IA
Joe* & Marcia Strunk	Main Avenue Redemption Center; Clinton, IA
Jeff Messenger*	JLM Services; St. Charles, IA
Sheila Douglas	Iowa Wholesale Beer Distributors Association
Brian W.* & Angie Boyd	Southeast Iowa Redemption Center; Keokuk, IA
PROVIDED WRITTEN COMMENTS BY 8/19/08	
Troy Willard	Can Shed, LLC; Cedar Rapids, IA

Comments that go to clarifying provisions in the proposed Rules:

1. Requests for funds need to be eligible for grants to purchase container counters that can handle different sizes of containers. (Mr. Strunk)

Response: Proposed Rule 567-107.16(4)(a) covers this.

2. Grant applications should not be required to state a cash match, but those that do should get a more favorable consideration. (Mr. Boyd)

Response: Proposed Rule 567-107.16(4)(a) also covers this.

3. The purpose of what the grants are to do needs to be emphasized. (Mr. Boyd)

Response: The goals of sustainability, convenience, and accessibility are described in Proposed Rule 567-107.16(1), and the kinds of improvements to be considered are in Proposed Rule 567-107.16(4)(a)&(b).

4. Grants promoting convenience and accessibility could be counter-productive to redemption centers' interests by increasing the numbers of containers handled without providing for the extra costs involved. (Mr. Willard)

Response: Requests for funds can be just for sustainability improvements, and do not have to address all three goals.

Comments that go to clarifying provisions in the enabling legislation:

1. The grants should be based on the volume of a redemption center's business, requiring scaled matching funds criteria so that larger operations that are willing to invest larger amounts of money can have it matched to offset those costs. (Mr. Willard)

Response: Nothing in 2008 Iowa Acts, House File 2700, sections 78 and 88 (HF 2700) mentions requiring matching funds. Proposed Rule 567-107.16(4)(a) gives favorable consideration for applications that provide cash match without requiring it.

2. Redemption centers that are not on record with the Department should not be eligible for grants. (Mr. Kincer)

Response: HF 2700 only stipulates that grants be for improvements to independent redemption centers in existence prior to July 1, 2008. Proposed Rule 567-107.16(3)(b) does require an applicant that is not on record with the Department to provide documentation of its existence prior to July 1, 2008.

3. If all of the funds available for grants are not awarded in the current fiscal year, whatever is left over should still be used somehow for redemption centers. (Mr. Messenger)

Response: HF 2700, section 78 enacts a new Iowa Code section 455C.17(2)(b) that provides for the grant program to continue until all of the allocated funds are used for the program's purposes.

Comments that go to clarifying administration of the program:

1. A grant for an independent redemption center should mean no more than one per each facility. (Mr. Boyd)

Response: That is the way the grant application form is being designated

2. Provisions need to be in place to make sure every independent redemption center in existence prior to July 1, 2008 is given proper opportunity to apply for a grant. (Mr. Messenger)

Response: Two informational memos have been sent to all redemption centers for which the Department has contact information, plus about a dozen others that have requested notifications. A web-page for the redemption centers grants program - http://www.iowadnr.com/waste/policy/rc_grants.html - has been created for posting materials, particularly the application form when it is authorized to be distributed.

3. Grants should cover costs for eligible improvements that have been incurred since the program was established. (Mrs. Kincer)

Response: As a fundamental administrative practice, funds are not paid out for expenses that were incurred before the funds were made available. Grant applications will be evaluated on a case-by-case basis to identify eligible expenses that grant funds would properly pay for in accordance with that fundamental administrative practice.