



SF Environment

Our home. Our city. Our planet.

A Department of the City and County of San Francisco

Edwin M. Lee
Mayor

Deborah O. Raphael
Director

May 26, 2016

Mary Nichols, Chairwoman
California Air Resources Board
1001 "I" Street
Sacramento, CA, 95814

Re: Landfilling of organics ban in the Proposed Short-Lived Climate Pollutant Reduction Strategy (SLCP)

Chairwoman Nichols:


I applaud the California Air Resources Board for proposing a critically needed proactive and bold approach to reducing the short-lived climate pollutant emissions from the landfilling of organic materials. I strongly support the proposed action to significantly reduce methane emissions by virtually eliminating the landfilling of organics, especially food scraps. Diverting organics from landfills to better uses will both mitigate climate emissions and improve adaptation to climate change, including significant carbon sequestration from using compost and improving soil health and resiliency in the face of climate change. This action will result in significant co-benefits and help the state achieve multiple policy objectives, such as increase production of biofuels and food from the digestion and composting of organics, as well as food waste prevention and food rescue that will help feed millions of food insecure Californians.

I appreciate that staff have identified key challenges or barriers along with strategies and funding mechanisms to help move organics out of landfills and utilize clean technologies for maximum environmental benefit. I support the proposal to develop and implement regulations to phase out the landfill disposal of organics materials. I believe an effective regulatory strategy can prevent the creation of these inherently avoidable potent methane emissions by virtually eliminating the landfill disposal of organic waste by 2025.

The City and County of San Francisco San Francisco has already banned organics from landfill through our mandatory food and other organics composting program. In 2009, we required all properties in all sectors and everyone throughout San Francisco to separate organics from trash to landfill for composting, with enforcement and financial penalties for noncompliance, after previously instituting financial incentives and outreach and education. As a result of this ban of organics in the landfill stream, we have over 99% of all properties, including over 350,000 households, 9000 apartment buildings and 90,000 businesses and institutions compliant for having composting collection service. This accomplishment of citywide composting with Recology, our service provider, is a demonstration of the public-private partnership needed to spread this statewide.

After we made composting mandatory we saw a significant rate of increase in tons of organics diverted from landfill that has kept growing to nearly 700 tons per day of mostly food scraps that are turned into compost used to increase soil fertility and productivity in California agriculture. Hundreds of farms and vineyards use compost made from San Francisco organics and are realizing great benefits in reducing irrigation, fertilizer and pesticide

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use and increased carbon in soils all resulting in healthier plants and food. We are largely achieving the goals set out in the proposed by the organics ban strategy.

These composting programs provide a triple win for climate – they prevent methane emissions from landfill, they promote soil health and so increase carbon sequestration, and they decrease need for water and synthetic fertilizers.

We have also shown the social benefits of diverting organics, including feeding many thousands of people with recovered edible food and producing numerous valuable products, such as animal feed and biodiesel, in addition to compost. All of which, in our experience, has created many more jobs than landfilling. This program has been very popular in San Francisco.

Experience has shown the power and need for strong public policy to mandate and drive diversion. The SLCP will provide this policy push needed at the state level and the financial support to move organics out of landfill. The Governor's proposal for Cap & Trade funds also provides a critical contribution to the facility investments needed for diverse benefits available form organics.

Thank you for this bold vision and we are happy to share our experience and lessons to help make this proposed plan a reality.

Sincerely,

A handwritten signature in blue ink that reads "Deborah O. Raphael". The signature is written in a cursive style with a large initial "D".

Deborah O. Raphael
Director