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Comment on the Proposed Short-Lived Climate Pollutants Reduction Strategy
Re: Community and Small-Scale Composting

GRAS supports the strategy to reduce SLCP's, and asks that you recognize Community Composting programs as valuable to these goals. Please consider the benefits of existing community composting programs, and programs that may arise with growing trends of urban agriculture and community gardening. Please do not intentionally or unintentionally prohibit such small-scale local practices that utilize food-scrap resources within the communities and neighborhoods that they are produced.

New York City is the national leader in community composting, with hundreds of small/medium sized facilities behind public schools and under bridges. NYC's 'Community Compost Report 2014,' asserts that community composting plays an important supporting role, with waste management only one part of its mission. Community composting plays an "important community outreach and engagement tool with a strong compost education component" for the public.

Micro and community composting programs can, and should, comply with all statistical requirements that are mandated and all standards for safe transportation.

Existing community compost programs are built on 'first-adopters' (restaurants and food producers) who lead the way in diverting organics and food waste from the landfill without a mandate. Many have proactively developed custom partnerships, practices and infrastructures to handle their food scraps responsibly, with the knowledge that their waste is a valuable resource that will go back into community neighborhoods... and with much fanfare.

Healthy soil used locally in community and school gardens, urban farms, public and private landscapes, greening projects, habitat restoration and tree planting is, arguably, one of the 'highest and best' uses of these resources. Horticulturists want this 'organic matter in the soil,' to complete the nutrient food cycle and sustainably manage their food production. Healthy soil not only feeds our local ag movement by cultivating nutrients for healthy food, but builds soil structure, reduces erosion, helps to sequester carbon from the atmosphere, encourages bio-diversity, and retains water to help mitigate our State's drought conditions.

Please do not inadvertently prohibit small-scale community compost programs when developing legislation for large-scale infrastructures and services. Please consider small-scale community composting projects to be complementary to California's long-term diversion goals and understand all current first adopters as leaders who are already doing everything they can to reduce GHG and divert food scraps from the landfill.

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