



October 30, 2015

Mr. Michael J. Tollstrup, Chief
Project Assessment Branch
Industrial Strategies Division
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812-2815

Subject: Recology Comments on the Proposed Short-Lived Climate Pollutant Reduction Strategy

Dear Mr. Tollstrup:

On behalf of Recology, thank you for the opportunity to review the Draft Short-Lived Climate Pollutant Reduction Strategy (SLCP).

Recology manages municipal solid waste collection, recycling and disposal services that span the needs of 120 urban, suburban, and rural communities. We are an employee-owned company dedicated to building exceptional resource ecosystems that protect the environment and sustain our communities.

In 1996, Recology pioneered the nation's first comprehensive urban organics collection program for residential and commercial customers. This program transformed food waste collection and composting from a waste collection sideline into a major component of community sustainability, returning nutrients to the soil and cutting greenhouse gas (GHG) emissions.

Today, Recology operates nine composting facilities in California and Oregon. In 2014, Recology composted over 1 billion lbs of yard trimmings and food scraps; and sold nearly 300 million lbs of compost in California.

As one of the largest compost operators in the nation, we are providing comments on the California Air Resources Board (ARB) key strategy to cut state methane emissions. Specifically, we are commenting on ARB's efforts to develop new regulation in partnership with CalRecycle by 2018 to effectively eliminate organic disposal by 2025.



Organics Recycling Mandate will Spur Infrastructure Development

The draft strategy correctly identifies the need for significant development of composting and anaerobic digestion (AD) infrastructure development as a critical path to success. The acquisition, entitlement, and construction of composting and AD facilities to handle the estimated 12 million tons of organic material currently being disposed of will have significant costs. However, the economic hurdles can be overcome if incoming tonnage is guaranteed through contracts and franchises; likely following a mandate. Recology has come to understand this model well, as we experienced this same occurrence with our largest public customer, the City and County of San Francisco.

In 2009, Recology partnered with the City and County of San Francisco (CCSF) to establish and implement the most aggressive mandatory composting and recycling ordinance in the United States. Once the organic waste stream was guaranteed by the local ordinance, Recology was able to commit significant capital towards infrastructure development. Three large composting facilities in the Bay Area and Central Valley were subsequently further developed to handle a total of 3,500 tons per day of source separated organic waste.

Through extensive collaboration and public outreach with our customers and local communities, we have diverted nearly 2 million tons of San Francisco's organic material from landfill disposal. By processing and recycling food scraps and other organic materials, Recology and its community partners have reduced GHG emissions, created new jobs at compost and transfer facilities, and produced valuable compost for California's agricultural and wine industries. Once organic recycling is mandated, we are confident that this model can be replicated throughout California.

Incentivizing the Siting of New Facilities to Handle Urban Generators

California's urban areas present a significant challenge, as they are the state's largest generators of post-consumer food waste and have very low potential for the development of compost facilities. The industry has looked to the Central Valley and accessible rural areas to fill the urban organic processing capacity needs. Historically, this has created tension between urban and rural communities, since host communities bear the brunt of facility impacts. These impacts include off-site odors, vectors, and litter (ie plastic contamination) from compost facilities that process urban organic feedstock. While these issues can be largely reduced through best management practices and the latest processing technology, host communities are nevertheless impacted.

Recology believes that this tension will continue to exist, and impede local land use entitlement as new facilities go through the development process. Moreover, we believe that the Legislature,



ARB, and CalRecycle should explore mechanisms to acknowledge and reward local jurisdictions (possibly through ongoing incentive payments or regulatory relief) that host composting facilities and process California's large organic waste streams.

In conclusion, Recology supports the overarching goals set forth by the Draft SLCP Reduction Strategy. These goals are laudable, aggressive, and can ultimately be achieved through a coordinated and sufficiently funded effort and sustained partnership between the public and private sectors.

If you have any questions or require further information about our comments and concerns, please contact me at epotashner@recology.com.

Sincerely,

Eric Potashner
Vice President & Sr. Director of Strategic Affairs