



May 26, 2016

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

Electronic Submittal: <http://www.arb.ca.gov/lispub/comm/bclist.php>

RE: Organic Waste Management in the Proposed Short-Lived Climate Pollutant Reduction Strategy

Dear Chairwoman Nichols,

This letter is in response to the request for comments on the Proposed Short-Lived Climate Pollutant (SLCP) Reduction Strategy (Proposed Strategy). On behalf of Recology, I am writing to express our strong support for the Proposed Strategy's goal of effectively eliminating disposal of organics in landfills by 2025.

Recology provides recycling, organics, and solid waste collection and processing services that span the needs of nearly 100 urban, suburban, and rural communities in California. We are an employee-owned company dedicated to building exceptional resource ecosystems that protect the environment and sustain our communities. Through the nine organics processing facilities that we operate in California and Oregon, we annually compost over one billion pounds of yard trimmings and food waste that would otherwise be disposed of in landfills.

Elimination of Disposal of Organic Waste:

Recology strongly supports the elimination of disposal of organics in landfills. While landfill gas collection and conversion technology has vastly improved over time, and while there remains disagreement on the exact emissions released from landfills; there is no sound argument to be made in favor of continued disposal and storage of methane producing organic material underground.

California has taken initial steps towards eliminating the disposal of organic waste with passage of recent legislation, including Assembly Bill (AB) 341 (Chesbro, Chapter 476, Statutes of 2011), AB 1826 (Chesbro, Chapter 727, Statutes of 2014), and AB 1594 (Williams, Chapter 719, Statutes of 2014). However, while California has made progress on organic waste diversion, we are not currently on a path towards eliminating the disposal of organics by 2025. To achieve this



goal, the State must take the next step and require mandated organics recycling programs at the local jurisdictional level. Recology, in partnership with local jurisdictions, has been able to achieve over 90% organics diversion in areas with mandated food waste recycling programs.

Moreover, ARB and CalRecycle have recognized that increased organics diversion will require an increase in non-disposal infrastructure. New and expanded organics processing facilities will need to be entitled at the local level and adequately funded. Potential facilities will face significant challenges through local land use and regulatory permitting processes. Recology encourages ARB, CalRecycle, and the Legislature to explore mechanisms to streamline local land use entitlement processes while also providing jurisdictions an incentive to host organics facilities.

The benefits of making and using compost are innumerable: decreased greenhouse gas emissions, healthier soil composition, increased crop yield, decreased need for water, increased water quality, etc. The demand for our compost currently exceeds the supply. Eliminating landfill disposal of organics will guarantee feedstock for organics processing facilities so that demand for compost products is better met.

Recology looks forward to continuing to work with ARB as the agency develops regulations that will achieve this goal in an efficient and economical way. We thank you for your efforts.
Sincerely,

Eric Potashner
Vice President & Sr. Director of Strategic Affairs