



December 5, 2016

County of San Diego, Department of Public Works
Attention: Michael Wonsidler
5510 Overland Ave, Suite 210
San Diego CA 92123
recycle@sdcounty.ca.gov

RE: County of San Diego's Strategic Plan to Reduce Waste

Dear Mr. Wonsidler,

Please accept the following comments on behalf of Climate Action Campaign regarding the County's Strategic Plan to Reduce Waste. Climate Action Campaign's mission is to stop climate change. To achieve this goal, Climate Action Campaign advocates for local governments to adopt climate plans with actionable strategies to reduce their carbon footprint to protect the quality of life for future generations.

One of the main pillars of climate planning involves committing to zero waste. By diverting and reducing the amount of food waste and recyclable materials that make it into landfills, a significant amount of pollutants can be kept from being released into the atmosphere. Furthermore, food waste has great potential to be transformed into compost where it can be repurposed to maintain healthy soils that mitigate climate change and provide resilience against drought. We are pleased this plan outlines a strategy to achieve zero waste and we urge the County to incorporate the measures outlined in this plan into the County's Climate Action Plan currently under development.

Please accept the following recommendations for the draft plan:

1. Prioritize waste reduction and food donation efforts.

Expand the Social Marketing/ Behavior Change Marketing Program (ES-1 Program 8)

- In addition to the outreach efforts to be undertaken, we recommend a program based on recycling reporting by neighborhoods and schools. While reporting programs are not generally associated with a specific number of tons diverted, studies show that participation increases when metrics are recorded and reported. Capturing metrics and then sharing that information with program participants is expected to enhance participation.
- Develop a recognition program to encourage diversion. A recognition program could applaud local businesses, properties, non-governmental organizations, neighborhoods/communities, and County departments, for their zero waste efforts, similar to the City of San Diego's Waste Reduction and Recycling Awards Program that has primarily been targeting businesses and multi-family complexes, to include residents, education providers, policy groups, non-profits, etc.

Promote Food Waste Prevention (ES-1 Program 15)

- The Program is to include the hiring of a consulting firm to help direct efforts at food waste

education. We recommend further coordination with the San Diego Food System Alliance who is set to implement the Natural Resources Defence Council's Save the Food Campaign in the County over the next two years (2017-2018). Because of the time frame, we recommend the ES-1 Program 15 begin implementation in the 2017-2018 period instead of the proposed 2018-2020 period.

- In the earliest stage of implementation, the County should consider adding a resolution to the Plan to create a county-wide day of the week where businesses are encouraged to not serve meat and residents encouraged to not consume meat (i.e. Meatless Monday). Cities such as Los Angeles, San Francisco, San Jose and Oakland have passed such resolutions in effort to reduce meat consumption for one day of the week. Doing so decreases dependence on this source of protein which happens to be the most carbon and water intensive. This along with other efforts to decrease food consumption are incredibly important while food waste diversion takes its time. The decrease in demand could also decrease water usage, methane emission, agricultural waste, and fertilizer usage at the source, while accustoming consumers to lesser meat in their weekly diet.

Support food donation through County Food System Initiative (ES-1 Program 16) and Support food waste reduction and food donation at County operations (ES-3 Program 17)

- We support prioritization of this effort to address food insecurity in the region as well as reduce the amount of organics headed to composting facilities or landfills.

We recommend that the following action be **prioritized after** the implementation of waste reduction and food donation efforts to minimize the input of recoverable waste at future large scale organic processing facilities.

Support Organics Processing Facility Development (ES-1 Program 2)

- What this Program does not mention is the ability of landfills and composting sites to accept fibrous yard trimming. Usually this trimming cannot be put through grinders meant for mulch since the tough fibers get caught in the machine. Recently, Miramar Landfill Greenery obtained a special grinder meant for such and is expected to phase in fibrous trimmings. The County could support expansion of composting infrastructure by looking into acquiring similar or additional specialized grinders.
- Another element is the support of constructing Resource Recovery Centers (RRC) at the entrances to landfills such as Miramar, Sycamore, and Otay. This would service transactions from non-franchised haulers delivering wastes in small vehicles, including homeowners, contractors, and businesses.
- An aerated static pile system is a potential step in separating food scraps for compost. This type of technology conducts composting in a controlled environment under a cover in the outdoors. Computer systems monitor and regulate oxygen, temperature and moisture to ensure ideal conditions for rapid and nuisance free composting. This change would enable the County to better process clean separated food scraps that would come to the participating landfills as a result of increased collection efforts. Diversion associated with this system would be part of the overall AB 1826 infrastructure.

2. Prioritize zoning enhancement and facilitate local small and medium scale composting systems.

The San Diego region is home to two essential components of the composting cycle: a large population and thousands of acres of farmland. For this reason, the County should enable farmers and community gardens to expand their composting ability by allowing them to accept organics generated off-site and provide technical assistance in the form of grants and/or education to help expand and improve their composting systems.

Support On-Site Community/ Commercial/ Farm Composting Projects (ES-1 Program 9)

- Supporting local composting efforts is especially important for larger and commercial farms that may be more likely to use chemical fertilizers. Compost successfully integrated with mulch and soils is able to better retain nutrients for crops, sequester carbon dioxide from the atmosphere, and retain water which is ever more important as the drought continues.

3. Further Recommendations on Hauling Systems and County Operations.

Modifications to the Non-Exclusive Hauling System

- In addition to the suggested modifications, the County should investigate the possibility of weekly greenery collection (including food scraps) and every-other-week trash collection. The County could monitor and evaluate pilot programs in other jurisdictions where yard trimming collection combined with food scraps is offered weekly and trash hauling is offered bi-weekly. If success is apparent in the evaluated pilot programs, staff should investigate the feasibility of conducting a similar pilot in the County.

Ensure Optimal Recycling at Facilities Owned or Leased by County (ES-3 Program 7)

- In addition to County-owned facilities' recycling being optimized, recycling at public spaces, parks, recreation centers, transit centers, and libraries should be fully implemented. Public space recycling is a key public education component that supports behavior change, where recycling away from home leads to increased recycling at both home and work.

Thank you for your consideration.



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