

- (1) If your organics are currently being used for ADC, if you propose a project that diverts this material from ADC to compost, would that count as diverting from the landfill?

Bill Worrell

- (2) One criteria is fiscal stability. What would a local government need to show to meet that criteria?

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- (3) Thank you for the opportunity to comment on the Organics Grant Program. My comments are as follows:

1. Ineligible costs include: "Purchase or lease of land or building". Please clarify what is considered a building. For example would a fully enclosed AD or composting facility be considered a building? The new San Jose AD project has a large building that includes a receiving area, enclosed digestion tunnels and finished product load out area. Would this be considered a building and not eligible for funding?
2. The purpose of the grant is to "... reduce the amount food and green material being disposed in landfills." How will you consider green material that is currently being used for ADC? My suggestion is for the purpose of this grant ADC be considered disposal in landfill because this material decomposes in the landfill and produces greenhouse gas. In addition if you do not consider ADC as disposal in a landfill, then you would need to allow projects that take green material that is currently being landfilled and convert it into ADC.
3. The scoring criteria includes, "15 points for the tons of organic material composted, digested, or source reduced." As written this gives priority to large projects since the amount of material diverted would be greater. A more equitable measure would be tons diverted per dollar of grant funding. Thus the more cost effective projects will be funded not necessarily the largest projects.

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