

From: Jennifer Arbuckle [mailto:Jennifer@NorthernRecycling.biz]
Sent: Thursday, March 19, 2015 2:04 PM
To: GHGReductions
Subject: Jennifer Arbuckle Rural communities

Hello,

We would like you to consider the fact that many rural counties North of Sacramento do not have any composting infrastructure in place. The local governments / business owners do not have the finances to fund the necessary infrastructure to make a municipal composting facility pencil, thus we would need some sort of subsidy or grant to allow us to start getting all of our organics out of the landfill. Thus we were all excited about CalRecycle's Organics grant program. However the scoring criteria that dictate that projects must be CEQA ready puts us at a huge disadvantage. Since our counties have never had to permit a food scrap composting facility they lack the knowledge or skill to determine whether we would need a Negative declaration or a EIR, thus they require us to pay for a third party to make the decision for them, this would cost upwards of \$50,000 which again our local government/businesses do not have especially if they were to pay for the this third party and not be assured that they will get the project funded. There should be special consideration for those of us in communities that need these funds to start the very basic first steps in windrow composting. We understand the importance of AD and other advancements but we need to start with the basics, without which we will not be able to get to 75% diversion. We have the land, the partnerships, the logistics, and the expertise to make organics recycling successful in Butte County, we want to divert as much as possible but we need the proper financial assistance. We have enough support and experience to get a composting facility permitting and up and running within 2 years, we just need some leniency with the scoring and for CalRecycle to realize that we need to be considered in a different light. And that many of our rural counties are quite large and have more than 70,000 people, having more than 70,000 people in a rural setting does not dictate that we are in financial equality with urban area.

Please help us help you.

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