

State Guide Plan Element: **SOLID WASTE 2038**

RI Comprehensive Solid Waste Management Plan

Public Comment and Hearing Report December 2014



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I. Introduction

This is a report on the two public hearings and comment period held by the Division of Planning (DOP) on behalf of the State Planning Council to consider adoption of a new Element, *Solid Waste 2038*, of the State Guide Plan. Two public hearings were held on behalf of the State Planning Council to accept comments on the Draft State Guide Plan Element: *Solid Waste 2038*, the Rhode Island Comprehensive Solid Waste Management Plan. This Report outlines the attendance at the hearings, and the public comments received. The written statements and comments submitted are included as attachments as well as recommendations for revisions to the Plan to respond to the comments submitted.

The Hearings were conducted in accordance with the State Planning Council rules of procedure and the Administrative Procedures Act. The public comment period ran from November 13, 2014 through Friday, December 19, 2014. Two public hearings were held as follows:

- Monday, December 8th at 6:00pm at Rhode Island Resource Recovery Corporation (RIRRC), 65 Shun Pike, Johnston Rhode Island 022919
- Monday, December 15th at 6:00pm at the Department of Administration William E Powers Building Conference Room A, One Capitol Hill, Providence Rhode Island 02908

Notice of the two public hearings and opportunity to comment on the draft plan were provided in English and Spanish through advertisement in the Providence Journal, posting on the Statewide Planning website, a direct mailing to the over 2,000 planning and transportation contacts in Statewide Planning's database, and notifications to RIRRC's list of contacts. The hearings began with a 20 minute informational presentation followed by opportunity for public comment. All persons were invited to present their views on the draft document in person at the public hearings, through a representative, or by filing a written statement with the Secretary of the State Planning Council. Written statements could be mailed or e-mailed to Nancy Hess, Supervising Planner, RI Statewide Planning Program, One Capitol Hill, Providence, RI 02908, nancy.hess@doa.ri.gov, or submitted at a hearing.

These hearing locations were accessible to individuals with disabilities. Any individual with physical or sensory impairments requiring assistance for a reasonable accommodation in order to participate in these hearings were able to make requests for accommodation at least five (5) business days prior to the hearing. Any individual requiring the services of a spoken language interpreter to participate in these hearings were also able to make requests for accommodation at least five (5) business days prior to the hearing. In total, 16 people attended the two hearings, and 6 people gave spoken comments. Over the course of the public comment period, 2 people or organizations submitted written comments.

II. Summary of Comments and Responses

Pay As You Throw

What Was Heard – 2 individuals commented favorably on adopting the concept of Pay As You Throw (PAYT) and one expressed opposition.

Response – Recognizing that there is a diversity of opinions on this strategy and based on feedback received from the RIRRC Board since the public hearings, the updated plan reflects a scaled back approach to PAYT by listing it as one of several potential funding options for the future of RIRRC. Revisions have been made in the Executive summary and Part 3 and to the recommendations in Part 4 that reflect the further analysis of these options as developed with the RIRRC staff and Board. The revisions outline a preferred course of action as approved by the RIRRC Board in March.

Commercial Recycling

What Was Heard – One individual offered an unfavorable opinion on the status of minimal enforcement for commercial recycling in the State. Also, a call for additional resources at the RI Department of Environmental Management (DEM) was heard.

Response –Part 2, Page 2-22 describes the status of required mandates, staffing levels, and enforcement capabilities for commercial recycling as supplied by the DEM. In response to the comment, a recommendation for increasing the resources provided to DEM for commercial recycling purposes has been added to Part 4 of the plan.

Food Waste Diversion

What Was Heard – An individual commented that some failed legislation on composting did not show as content in the Plan and that food waste should be addressed now and not wait for the waste characterization study and that overall, the state should be taking a faster track towards implementation.

Response – No Action Needed. Legislation that was enacted on food/organic recycling (RIGL 23-18.9-7(15)) is referenced in Part 3 of the plan on page 3-7. The current municipal pilot programs for municipal and home food waste programs are discussed in Part 2, page 2-14. See Part 4, page 4-4 for the recommendations for increasing and supporting food waste diversion in the commercial and residential sectors. The waste characterization study is already underway by RIRRC and it is a critical first step to understanding what types and volumes of wastes are being disposed of and therefore gauging what opportunities exist. It is scheduled for completion in 2015. It is important to complete this study as soon as possible to help frame future food waste diversion and other policy choices for the State. No further action needed until waste characterization study is completed.

Climate Change

What Was Heard – An individual commented positively about addressing climate change and thought that it should be featured in the Executive Summary. He also asked if a solar energy generating facility at the landfill had been explored.

Response – The draft plan discusses climate change on Page 2-34 but it is felt that climate change, as it relates to solid waste does not rise to a level that justifies inclusion in this Plan's Executive Summary. A reference to the Executive Climate Change Coordinating Commission's report has however been added to Page 2-34 to strengthen the linkage to this important planning document which is focused on climate change concerns.

The question about the solar power facility was answered by Mike OConnell. He indicated that RIRRC had discussed the possibility of incorporating a solar cap on the landfill with the Office of Energy previously, but any solar power operation would have to be built and operated by a third party and the payback timeframe and return on investment would not be adequate for a developer to justify such a project. RIRRC continues to evaluate opportunities for incorporating renewable energy technologies into waste disposal, as was done with the current methane capturing operation managed by a third party operator.

Incineration

What Was Heard – Two individuals spoke in opposition to the introduction of incinerator facilities in the State.

Response – No Action Needed. The concerns of the individuals were noted. The concept of studying the use of waste to energy technologies was listed as a possible option for post landfill closure as were many other technologies, but it is not listed as a specific recommendation.

Building Code Regulation

What Was Heard – An individual commended the plan for suggesting changes to the building code requirements to address waste issues, but requested that the plan go further and make it a recommendation.

Response – Based on the above comment, a recommendation was added to Part 4 encouraging the State Building Code Commission to consider adding food waste diversion and recycling space requirements for new buildings.

Composting

What Was Heard – A comment suggesting the expansion of municipal composting was heard.

Response – The current municipal programs for composting are discussed in detail in Part 2. A recommendation was added to Part 4 encouraging more local composting opportunities. The current waste characterization study (see response under Food Waste Diversion) will also help identify the opportunities for expanded composting.

Alternative Fuel Vehicles

What Was Heard – One individual spoke in favor of expanding alternative vehicle fuel choices in order to reduce greenhouse gas emissions from transport of solid waste.

Response – No Action Needed. The promotion of alternative fuel vehicles already exists as an environment strategy (Strategy EN.3.e on page 5-18) in State Guide Plan Element 611: Transportation 2035.

III. Public Hearing Proceedings

Hearing #1

Mr. Flynn called the first hearing scheduled for 6:00 P.M. at the Rhode Island Resource Recovery Corporation to order at 6:06 P.M.

Attendance - Approximately 12 persons attended the hearing. Members of the public in attendance included: Mr. Michael Debrosse, City of Woonsocket Recycling Coordinator & Advisory Committee Member; Mr. Michael Hogan, RI House Policy Office; Mr. Paul Eno, RI Builder Report Magazine; Ms. Meg Kerr, Clean Water Action, Providence, RI & Advisory Committee Member (formerly Jamie Rhodes); Mr. Bob Vanderslice, RI Department of Health & Advisory Committee Member; Mr. Grant Dulgarian, Ecology Action for RI, Providence; Mr. Seth Lemoine, Director Department of Public Works, Town of Smithfield, RI; Ms. Egidia Vergano, Recycling Coordinator, Town of Narragansett, ; Ms. Mary Rounds, Providence; Mr. Andrew Grasse, Bristol, RI; Mr. Gary Trembl, Director of Public Works, Gloucester, and Ms. Mo McManus, Recycling Coordinator, Town of Smithfield.

Division of Planning Staff in attendance included Mr. Kevin Flynn, Associate Director, Ms. Nancy Hess, Supervising Land Use Planner and Mr. Paul Gonsalves, Senior Land Use Planner. RI Resource Recovery Corporation (RIRRC) staff in attendance included Mr. Michael OConnell, Executive Director, Mrs. Sarah Kite-Reeves, Director of Recycling Services and Mr. Michael McGonagle, Director of IT & Planning.

Opening Statements - Mr. Flynn explained that the draft of *Solid Waste 2038*, the Rhode Island Comprehensive Solid waste Management Plan, was accepted for public hearing by the State Planning Council on October 9, 2014. Notice of this hearing was mailed to the chief elected officials and planning officials of all municipalities in the State, and to more than 400 persons, agencies, and groups who have requested such notice. Notice of this hearing in both English and Spanish was published in the Providence Journal on November 8 and 15, 2014.

Mr. Flynn explained the hearing procedures. He stated that the hearing would be conducted in accordance with the Rules of Procedure adopted by the State Planning Council and the Administrative Procedures Act. He would first call upon Mr. Michael OConnell, Executive Director, RI Resource Recovery Corporation, to provide a brief informational presentation on the purpose and content of the Plan.

Mr. Flynn then introduced Mr. OConnell. Mr. OConnell presented a Power Point Presentation on the Plan. He explained that the proposed plan was a product of their work as staff working with a voluntary advisory committee of solid waste stakeholders. The Committee was composed of representation of municipal public works officials, state agencies, private business, and environmental organizations. It had 8 meetings between 2013 and 2014. This Plan will replace the existing element of the State Guide Plan.

Mr. OConnell proceeded with an overview of the RIRRC and then the contents of the plan. He explained the operating and financial structure of RIRRC. The mission, objectives and successes since the last plan were stated. Mr. OConnell pointed out the key financial trends and discussed the upcoming funding issues that will occur if nothing is changed. The Plan will address three issues; 1) funding challenges, post landfill disposal options, and 3) strategic options to reduce solid waste. Possible funding solutions include raising the municipal disposal fee, establishing a price structure to provide price stabilization and/or a pay-as-you-throw program. Mr. OConnell stated that the options mentioned will still need further study and the final product may in fact be some type of hybrid approach.

Public Comments - Mr. Flynn opened the hearing for public comment. The following people spoke:

- 1) Ms. Meg Kerr, Clean Water Action, Providence, RI - Ms. Kerr spoke in support of the plan. Stated that the former director of Clean Water Action, Jamie Rhodes, was a member of the plan's advisory committee

and many of the concerns that he raised were addressed in the plan. Her three comments were concerning 1) funding details, 2) new programs to reduce solid waste, and 3) post landfill disposal options. Regarding funding, specifically the pay-as-you-throw option would be an effective strategy and the 2015-2017 timeframe will provide enough time to pursue needed studies. She then commended the strategy of reducing solid waste, especially through Extended Producer Responsibility (EPR) programs. Clean Water Action has fought hard to keep incineration out of the waste disposal options, so post landfill options are critical. She referenced the City of Providence's goal of reaching "zero waste" status by 2033 and she believes that the rest of the state can follow in that direction. Finally, a position statement opposing the use of incinerators for solid waste disposal was expressed. Her written statement is included as Attachment # 3.

- 2) Mr. Grant Dulgarian, Ecology Action for RI, Providence - M. Dulgarian started by commending all who worked on the plan for putting a high emphasis on recycling. He then went on to ask a few clarifying questions regarding expense trends, commercial waste reductions, timing of the waste characterization study, and change in recycling rates/tonnage. He later asked how pay-as-you-throw would work in municipalities where automated collection is now in effect. Ms. Kite-Reeves stated that it would work much as it does now and the bags would be color-coded and the vehicles are equipped with a camera system so they can see the bin contents in real time. Mr. Dulgarian then stated that he did not agree with the requirement to buy bags to participate in the mandatory pay-as-you-throw program, as more emphasis should be put on recycling.
- 3) Mr. Paul Eno, RI Builders Association - RI Builder Report, reporter - Mr. Eno had a question related to the fate of construction and demolition debris, specifically the cost and alternatives for disposal. Mr. OConnell said that costs should generally be steady in the future, though construction debris disposal is more limited since it is banned from being grinded up for use as landfill cover. Ms. Kite-Reeves later clarified for Mr. Eno that at the current time, most construction and demolition debris is either processed by one of two processors in RI, or is shipped to facilities in MA or CT.

Mr. Flynn asked if anyone else wished to be recognized to speak on the Plan. No others wished to speak.

Adjournment- Mr. Flynn thanked everyone for their comments. He stated that the Statewide Planning staff would review all comments. All comments will be provided to the State Planning Council for its consideration in adopting a final version of the Plan. He indicated written statements made relative to any aspect of the proposed Plan would be accepted until the close of business on Friday, December 19, 2014. He adjourned the hearing at 6:49 P.M.

Hearing #2

Mr. Rhodes called the second hearing scheduled at the Department of Administration, Conference Room B on 12/15/14 to order at 6:05 P.M.

Attendance - Approximately 4 persons attended the hearing. Members of the public in attendance included Mr. Grant Dulgarian, Ecology Action for RI, Providence; Mr. Fred Gomes, Town of East Greenwich; Mr. Peter Galvin, RI Sierra Club and Ms. Pam Sherrill, East Providence.

Division of Planning Staff in attendance included Mr. Jared Rhodes, Chief, Statewide Planning Program, Ms. Nancy Hess, Supervising Land Use Planner and Mr. Paul Gonsalves, Senior Land Use Planner. RI Resource Recovery Corporation (RIRRC) staff in attendance included Mr. Michael OConnell, Executive Director, Mrs. Sarah Kite-Reeves, Director of Recycling Services and Mr. Michael McGonagle, Director of IT & Planning.

Opening Statements - Mr. Rhodes explained that the draft of *Solid Waste 2038*, the Rhode Island Comprehensive Solid waste Management Plan, was accepted for public hearing by the State Planning Council on October 9, 2014. Notice of this hearing was mailed to the chief elected officials and planning officials of all municipalities in the State, and to more than 400 persons, agencies, and groups who have requested such notice. Notice of this hearing in both English and Spanish was published in the *Providence Journal* on November 8 and 15, 2014.

Mr. Rhodes explained the hearing procedures. He stated that the hearing would be conducted in accordance with the Rules of Procedure adopted by the State Planning Council and the Administrative Procedures Act. He would first call upon Mr. Michael OConnell, Executive Director, RI Resource Recovery Corporation, to provide a brief informational presentation on the purpose and content of the Plan.

Mr. Rhodes then introduced Mr. OConnell. Mr. OConnell presented a Power Point Presentation on the Plan. He explained that the proposed plan was a product of their work as staff working with a voluntary advisory committee of solid waste stakeholders. The Committee was composed of representation of municipal public works officials, state agencies, private business, and environmental organizations. It had 8 meetings between 2013 and 2014. This Plan will replace the existing element of the State Guide Plan.

Mr. OConnell proceeded with an overview of the RIRRC and then the contents of the plan. He explained the operating and financial structure of RIRRC. The mission, objectives and successes since the last plan were stated. Mr. OConnell pointed out the key financial trends and discussed the upcoming funding issues that will occur if nothing is changed. The Plan will address three issues; 1) funding challenges, post landfill disposal options, and 3) strategic options to reduce solid waste. Possible funding solutions include raising the municipal disposal fee, establishing a price structure to provide price stabilization and/or a pay-as-you-throw program. Mr. OConnell stated that the options mentioned will still need further study and the final product may in fact be some type of hybrid approach.

Public Comments - Mr. Rhodes opened the hearing for public comment. The following persons spoke:

- 1) Mr. Peter Galvin, RI Sierra Club - Mr. Galvin first asked a question regarding the existing landfill gas recovery and processing facility. He asked if the energy used was produced on site, or if it was from the grid. Mr. OConnell answered that it was indeed from the grid, as set up through the 3rd party company who runs the landfill gas recovery and processing plant. Mr. Galvin followed up by asking if RIRRC had ever considered using a solar generator for the site. Mr. OConnell said that they have explored it, but the energy produced would be insufficient, as the payback time would be longer than desired. The topic of an incinerator was raised and then clarified, as all technology options are on the table. He later added official comments regarding the plan's inclusion of solid waste disposal's risk to climate change, particularly the release of methane gas. He referenced recent state legislation that was significantly revised before being passed. He then urged reconsideration of the timeframe set to measure the greenhouse gas emissions.

His written comments were specific and were geared towards making additional references to the legislation past relating to food waste diversion. His written statement is included as Attachment # 4 and his follow up comments are included as Attachment #5.

- 2) Mr. Grant Dulgarian, Ecology Action for RI, Providence - M. Dulgarian asked a question regarding waste reduction beyond existing levels over time. Mr. OConnell explained the current reduction levels and the role that increased recycling plays.
- 3) Ms. Pam Sherrill, East Providence - Ms. Sherrill spoke in favor of the pay-as-you throw program. She lived in a community where the program was in effect. She also cautioned that with the program, there must be a workable mechanism in place to deal with bulk items.

Mr. Rhodes asked if anyone else wished to be recognized to speak on the Plan. No others wished to speak.

Adjournment - Mr. Rhodes thanked everyone for their comments. He stated that the Statewide Planning staff would review all comments. All comments will be provided to the State Planning Council for its consideration in adopting a final version of the Plan. He indicated written statements made relative to any aspect of the proposed Plan would be accepted until the close of business on Friday, December 19, 2014. He adjourned the hearing at 6:40 P.M.

IV. Informational Presentation

Michael O'Connell, Executive Director, RIRRC, Power Point Presentation



Updating the Comprehensive Solid Waste Master Plan –
The Future of Solid Waste Management in Rhode Island

Michael O'Connell
Executive Director,
Rhode Island Resource Recovery Corp.
December 2015

Recycling.
Make it second nature.

RIRRC Mission/Objectives

- **Mission:** Provide safe, environmentally compliant, clean, and cost effective solid waste and recycling services for all Rhode Islanders.
- **Key Objectives:**
 1. Continue to increase the life of the landfill in order to provide long term cost effective disposal costs for all municipalities.
 2. Work collaboratively with stakeholders to increase recycling and diversion to make RI a greener and healthier place to live.
 3. Remain financially self-sufficient funding all operational and capital requirements from fees.




Rhode Island Resource Recovery Recycling. Make it second nature.

20 Year Plan Overview

The Plan addresses three issues:

- 1) Funding Challenges
- 2) Post Central Landfill Disposal Options
- 3) Strategic Options to Reduce Solid Waste



Rhode Island Resource Recovery Recycling. Make it second nature.


1) Funding Challenges

Why is there a Funding (Revenue) Issue?

A) Municipal price (\$32/ton for 24 years) is below operational costs, below average regional cost, and is subsidized by the business sector.

B) Sewer upgrades required by the Regulators added an additional, unanticipated cost of \$9/ton to manage waste.


C) After 2009 restructuring reduced operating costs over \$20M and extended landfill life 10 years, 50% of remaining costs are fixed.



Rhode Island Resource Recovery Recycling. Make it second nature.

Successes since 2007

- Reduced solid waste disposal volume by 400K tons/year (35%)
- Reduced actual spending by \$26M (40%)
- Restructured RIRRC: Reduced staff by 1/3
- Cronyism eliminated
- Recycling rates increased after years of stagnation
- Materials Recycling Facility named Facility of the Year for North America 2013 by SWANA
- Pension funds and landfill trusts diversified under professional management firm using Board-approved strategy
- Sold or leased all industrial park lots, providing significant tax benefits to the Town of Johnston
- Successfully permitted Phase VI of landfill expansion, adding 25 years of life



Rhode Island Resource Recovery Recycling. Make it second nature.

RIRRC Benefitting RI

- 10 years of landfill life added since 2007
- Significantly lower disposal fees compared to New England market rates
- \$0.00 Tip Fee for recyclables, electronic waste, household hazardous waste, leaf and yard debris (municipalities), textiles, books, motor and cooking oils, plastic bags, and scrap metal
- 50:50 Profit Share for municipalities; Over \$5M given back to cities and towns since 2007
- Positive working relationship with key constituencies
- Most importantly, a positive and engaged workforce focused on making RI a greener and healthier place to live and work



Rhode Island Resource Recovery **Recycling. Make it second nature.**

Key Business Trends

Category	Actual Fiscal 2007	Actual Fiscal 2008	Actual Fiscal 2009	Actual Fiscal 2010	Actual Fiscal 2011	Actual Fiscal 2012	Actual Fiscal 2013
Statistical							
Solid Waste Tons(millions)	1.1	1.0	0.6	0.7	0.7	0.6	0.7
Average Tip Fee/Ton:							
*Municipal	\$32	\$32	\$32	\$32	\$32	\$32	\$32
**Commercial	\$52	\$55	\$61	\$53	\$50	\$50	\$50
Remaining Landfill Life (years)	19	20	29	28	27	26	25
*\$32 ton since 1992 **\$50 ton in 1990							



Rhode Island Resource Recovery **Recycling. Make it second nature.**

Key Financial Trends

(All In Millions)

	Actual 2007	Actual 2008	Actual 2009	Actual 2010	Actual 2011	Actual 2012	Actual 2013
Revenues	\$69.8	\$66.9	\$45.5	\$48.8	\$51.9	\$45.9	46.0
Operating Expenses	<u>-66.5</u>	<u>-61.7</u>	<u>-49.5</u>	<u>-43.4</u>	<u>-42.8</u>	<u>-35.6</u>	<u>-40.2</u>
Operating Income	3.3	5.2	-4.0	5.4	9.1	10.3	5.8
Transfer to State of Rhode Island	-3.3	-5.0	-7.5	0.0	0.0	-3.5	0.0



Rhode Island Resource Recovery **Recycling. Make it second nature.**

V. Written Comments



**Public Comments on "Solid Waste 2038"
December 8, 2014 at RI Resource Recovery
Respectfully submitted by Meg Kerr, Rhode Island CWA Director**

Thank you for this opportunity to comment on Rhode Island's comprehensive solid waste plan. I want to commend you for this plan that addresses the serious solid waste management challenges facing Rhode Island. Clean Water's previous director, Jamie Rhodes, participated in the Solid Waste Management Plan Advisory Committee, and many of his recommendations are incorporated into this plan.

Issue 1. Funding. Clean Water supports statewide, RIRRC managed pay as you throw as a strategy to reduce solid waste volumes and to pay for solid waste management programs. We recognize that it is an effective strategy, with success in other states and cities, and will result in reducing waste, increasing recycling, and increasing funding.

We also recognize that statewide implementation will require municipalities to re-think their disposal. Some towns already have the components of pay as you throw while others have municipal collection provided as a service to residents. The suggested 2015 – 2017 timeframe will allow for a detailed study that examines implementation in each city and town. This report will document the savings to trash and recycling budgets and this information can be used to build constituency support for the new strategy.

Issue 2. New Programs to Reduce Solid Water Disposal in the Central Landfill. Clean Water supports many of the recommended actions listed in the plan. We support a waste characterization study, and we support statewide pay as you throw, implemented after a study with strategies tailored to meet the needs of cities and towns. We also support statewide recycling services, food waste diversion, improved paper and packaging recycling in the commercial sector.

For expanding EPR programs, Clean Water has been a state leader in promoting EPR and we fully support expanded programs. We know that tires, carpets, paper and packaging, and CFL bulbs are likely next candidates for EPR strategies. We are also concerned about furniture disposal at the landfill. We understand that in Cumberland alone, as many as 3 – 5 sofas per week are collected with the trash and sent to the landfill.

We also recommend that Rhode Island DEM and Resource Recovery in conjunction with local DPW staff and recycling coordinators examine existing EPR programs. As the state develops new EPR programs, it would be helpful to understand the best practices and strategies that are

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www.cleanwateraction.org

working effectively and highlight recommendations for improvement. It is also important to explore communication strategies so the public can understand and support Rhode Island's programs for e-waste, paint, thermostats, switches and mattresses.

During 2015, Clean Water, with funding from the van Beuren Charitable Foundation, will be working with the City of Newport on a technical assistance program to help local businesses reduce waste generation and create effective systems for waste diversion into recycling and composting programs. We will pilot the program with special events venues, building from our decades of work with the Newport Folk and Jazz festivals. We look forward to sharing our experience with RIRRC and DEM. We are also piloting a CFL bulb recycling program at 13 local hardware stores and will use the data collected by this program to argue for legislation supporting a CFL bulb EPR program.

Issue 3: Post Central Landfill Disposal Options. CWA strongly urges Rhode Island to adopt "Zero Waste" objectives. The City of Providence has established a goal of Zero Waste by 2033 in *Sustainable Providence* (2014) and it is important that the state follow the City's lead. Rhode Island banned municipal waste incineration in 1992. The issue has come up from time to time and the state has consistently recognized that waste to energy is a poor policy choice. With renewable energy development underway and the impacts of climate change affecting lives throughout the state, now is not the time to reconsider that position.

Thank you all for your dedication and hard work on this plan. And thank you for the opportunity to present my comments.

Solid Waste Sept Draft plan Comments of Peter Galvin, Conservation Chair, Rhode Island Sierra Club,
December 15, 2014

This is a thoughtful plan that recognizes the risks to climate change that come from solid waste management, in particular the problem caused by methane emissions from food waste. Last year, the legislature attempted to address with legislation that would gradually phase in requirements to divert that food waste, but it was drastically cut back at the last second by what we understand was intervention by a large doughnut concern. Instead of calling for that decision to be reconsidered by the legislature, this plan defers any recommendations until 2016 following completion of yet another study. We would urge you to reconsider. We urgently need to get greenhouse gas reductions in place, even if they only go into effect over time, and the objections of one or two companies should not be allowed to set policy on this critical threat to the state.

Following are some technical comments on various sections of the report that are illustrations of our general concern.

1) Exec summary exclusively focuses on problem of limited space, without mention of impact on the environment of greenhouse gases

2) Page 2-6, discussing organics waste, has no mention of what new legislation did pass nor its implementation. (It is noted in recommendations later on in the report.) This will be on the agenda for annual composting conference in two months, and should be in EC4 report too, so why note here? Also, purpose of regulations referred to in that section r/e small scale composters is unclear.

Similarly, page 2-10, discussion of what can be done makes no mention of the legislation that failed, nor the limited legislation that was enacted.

"Food waste: Capturing 80% of RI food waste presents the biggest opportunity and perhaps the greatest challenge. Achieving large scale diversion of food waste requires the permitting and development of significant processing capacity. Comprehensive collection of food waste from both residents and businesses will need to be implemented, changing the way solid wastes are commonly managed at the source."

Page 2-14 has good discussion of municipals food waste diversion programs. No recommendations on encouraging use of these, or legislation to require municipalities to do this.

Page 2-22, about lack of DEM staff to enforce recycling, is shameful. Should be a recommendation to address this.

Page 2-23 provides good suggestions about how to deal with difficulties faced by commercial facilities, and suggests building code requirements for new buildings. That too should be a recommendation. And there is no discussion on home composting and possible approaches to advancing this goal. But there is no discussion of encouraging the development of local composting facilities, both aerobic and anerobic, and this should be a state action. This should also be integrated into page 2-27, discussion of market for composited materials.

Pages 2-34 and 2-35 provide useful information about climate change and waste, and it is good to see it there, particularly transportation emissions. Might want to look into biodiesel fuel rather than compressed natural gas, however, because producing the gas has significant adverse environmental impacts.

Page 3-7, Recommendation 2-B, does discuss the new legislation, but it apparently defers any recommendations until completion of study that will take another year. Points out that food waste rules on large scale facilities won't go into effect until then (implying we can't evaluate their impact). Meanwhile, methane emissions continue. We shouldn't have to wait until then to generate more action at the municipal level and to encourage new companies to set up digesting facilities.

12/18/14 11:32 AM by email

Supplement to Statement of Peter Galvin, on behalf of the Sierra Club of RI, presented earlier this evening at a hearing on the draft solid waste plan

1) It would be very valuable for the draft plan to recommend that during the next year, it consult with EC4, the Office of Energy Resources, and National Grid about the potential for locating a solar power facility at the site. There are many such sites, and the incoming governor is working on a Green Bank or other mechanisms to attract investment to RI that might be interested in such a project. As the State moves to reduce greenhouse gas emissions, consistent with the RRI Act, it needs to replace power generated by natural gas which releases methane at many stages from production to use in power facilities. Methane is now recognized to produce as much as 80 times the harm to the atmosphere as carbon dioxide, due to its immediate impact.

2) The draft plan should clarify that consideration is being given to on-site digesters for food waste, as well as off-site private facilities.

VI. Copy of Public Notices

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
RHODE ISLAND DEPARTMENT OF ADMINISTRATION
DIVISION OF PLANNING, STATEWIDE PLANNING PROGRAM

STATE PLANNING COUNCIL NOTICE OF PUBLIC HEARINGS

In accordance with the General Laws, Section 42-11-10(e) and Chapter 42-35, the State Planning Council has under consideration adoption of a draft plan entitled “**Solid Waste 2038**” an Element of the State Guide Plan. This draft plan focuses on critical issues and trends for solid waste management. It sets policy foundations for solid waste management in the State and provides goals, strategies and updated information to guide public and private actions for the effective management of solid waste in Rhode Island.

Notice is hereby given that two public hearings will be held on the adoption of this Plan at which time the opportunity shall be given to all persons interested to be heard upon the matter. The Plan will update and replace the expired State Guide Plan Element 171, Rhode Island Comprehensive Solid Waste Management Plan adopted in April of 2007.

The date, time and locations of the hearings are:

Monday December 15, 2014

6:00 to 8:00 PM

Conference Room A, 2nd Floor
Department of Administration
One Capitol Hill
Providence, Rhode Island

Monday December 8, 2014

6:00 to 8:00 PM

Board Room
RI Resource Recovery
Corporation
65 Shun Pike
Johnston, Rhode Island

Each hearing will begin with a brief informational presentation followed by opportunity for public comment. Written statements made relative to any aspect of the proposed Plan, including alternative approaches, overlap, or significant economic impact, can be submitted in writing prior to or at the time of the hearing or mailed by December 14, 2014 to: Kevin Flynn, Associate Director, Division of Planning, One Capitol Hill, Providence, Rhode Island 02908.

The draft plan may be viewed at Statewide Planning’s website at:

http://www.planning.ri.gov/documents/LU/swmp/171_Preliminary%20Draft_9.26.14.pdf

Also a copy of the draft plan is available for public inspection during business hours (8:30 AM to 4:30 PM) at the Department of Administration, Division of Planning, One Capitol Hill, 3rd Floor, Providence, Rhode Island (401-222-7901).

This meeting place is accessible to individuals with disabilities. Any individual requiring a reasonable accommodation in order to participate in this meeting should contact Thomas Mannock at 222-6395 (voice) or #711 (R.I. Relay) at least five (5) business days prior to the meeting. Any individual requiring the services of an interpreter to participate in this meeting should contact Michael Moan at 222-1236 (voice) at least three (5) business days prior to the meeting.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTAMENTO DE ADMINISTRACIÓN DE RHODE ISLAND
DIVISIÓN DE PLANIFICACIÓN, PROGRAMA DE PLANIFICACIÓN ESTATAL
CONSEJO DE PLANIFICACIÓN ESTATAL

AVISO DE VISTAS PÚBLICAS

De conformidad con la Sección 42-11-10(e) y el Capítulo 42-35 de las Leyes Generales, el Consejo de Planificación Estatal está estudiando la adopción de un anteproyecto titulado “**Residuos Sólidos 2038**”, un Elemento del Plan Guía Estatal. Este anteproyecto se centra en temas y tendencias críticos para el manejo de residuos sólidos. Establece los fundamentos de política para el manejo de residuos sólidos en el estado y provee objetivos, estrategias e informaciones actualizadas para guiar las acciones públicas y privadas para un manejo efectivo de los residuos sólidos en Rhode Island.

Por el presente se notifica que se llevarán a cabo dos vistas públicas sobre la adopción de este anteproyecto, durante las cuales se dará la oportunidad de hablar a todas las personas interesadas en ofrecer su opinión sobre el tema. El anteproyecto actualizará y reemplazará el Elemento 171 del Plan Guía Estatal ya expirado, Plan de Manejo de Residuos Sólidos Integral de Rhode Island adoptado en abril del 2007.

La fecha, hora y lugar de las vistas son:

Lunes 15 de Diciembre del 2014

6:00 a 8:00 p.m.

Salón de Conferencias **A**, 2^{do} piso
Departamento de Administración
One Capitol Hill
Providence, Rhode Island

Lunes 8 de Diciembre del 2014

6:00 a 8:00 p.m.

Sala del Consejo
RI Resource Recovery Corporation
65 Shun Pike
Johnston, Rhode Island

Cada vista empezará con una presentación informativa corta seguida de la oportunidad para que el público haga sus comentarios. Las declaraciones escritas hechas con relación a cualquier aspecto del anteproyecto, incluyendo enfoques alternativos, solapamiento o impacto económico significativo, pueden ser presentadas antes de o al momento de la vista o enviadas por correo para el 14 de diciembre del 2014 a: Kevin Flynn, Associate Director, Division of Planning, One Capitol Hill, Providence, Rhode Island 02908.

El anteproyecto puede ser revisado en la página web de Planificación Estatal en:

http://www.planning.ri.gov/documents/LU/swmp/171_Preliminary%20Draft_9.26.14.pdf

Asimismo, una copia del anteproyecto está disponible para revisión del público durante horas laborables (8:30 a.m. a 4:30 p.m.) en el Departamento de Administración, División de Planificación, One Capitol Hill, 3rd Floor, Providence, Rhode Island (401-222-7901).

Esta reunión es accesible para personas con discapacidades. Cualquier individuo que requiera una adaptación razonable para participar en esta reunión debe comunicarse con el Dr. Thomas Mannock en el 401-222-6377 (voz) o en el #711 (R.I. Relay) por lo menos cinco (5) días laborables previos a la reunión. Cualquier individuo que requiera los servicios de un intérprete para participar en esta reunión debe llamar a Michael Moan al 222-1236 (voz) por lo menos cinco (5) días laborables antes de la reunión.