



Californians
Against Waste



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Water Justice for All

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Union of
Concerned Scientists



NORTHERN CALIFORNIA
RECYCLING ASSOCIATION



Los Angeles Environmental
Justice Network



CEH
center for environmental health



THE STORY OF
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Zero Waste USA

Inspiring Communities to Embrace and Achieve Zero Waste

**Asamblea de Gonzales
Association of Irrigated Residents
California Food & Justice Coalition
Central California Environmental Justice Network
Desert Protection Society**

**Grayson Neighborhood Council
Society for Positive Action
West Berkeley Alliance for Clean Air and Safe Jobs
West County Toxics Coalition
West Oakland Environmental Indicators Project**

April 7, 2017

The Honorable Assembly Member Cristina Garcia
Assembly Natural Resources Committee
State Capitol
Sacramento, CA 95814

RE: AB 655 (O'Donnel) Inclusion of Incineration in RPS – Strong Opposition

Dear Assembly Member Garcia,

The undersigned organizations are writing in strong opposition to AB 655 by Patrick O'Donnell. This bill would classify the incineration of garbage as a renewable resource that is eligible for Renewable Portfolio Standard (RPS) credit. Bailing out the state's failing incinerators now that they can no longer compete against truly renewable energy generation flies in the face of our stated goals, harms the communities that have borne the brunt of the impacts of these facilities, and undercuts the investments made by renewable energy companies and recyclers.

Over the last two decades, the legislature has repeatedly upheld protections for California's natural resources by rejecting proposals to incentivize and promote technologies that destroy resources and pollute our environment. Instead the legislature has continually adopted policies to shift our electricity generation from dirty fossil fuel derived sources to renewable alternatives, such as solar and wind, and to recycle more of our waste stream. These policies are working and having the exact effect that they were intended to have, but AB 655 proposes to artificially prop up two dirty incinerators that can no longer compete with renewable energy alternatives.

The two facilities in question are located in low income communities of color, as are a majority of other facilities of this type around the country. Incineration has been shown to release dioxins, mercury, lead, carbon dioxide, and other harmful pollutants into the air, soil and water. Dioxins are among the most carcinogenic substances known to humankind.

Moreover, a significant portion of the materials found in the waste stream going to municipal incinerators like the ones in question are not renewable resources, but are instead either fossil-based or otherwise produced by the mining and processing of non-renewable resources. For instance, plastics are made from non-renewable petroleum, coal and other fossil fuels that renewable energy is designed to reduce. Similarly, metals and many textiles are made from fossil fuels and non-renewable ores. Even biogenic materials, such as paper, have significant environmental impacts from their harvest and processing, and have the greatest energy conservation impact when they are recycled into new products. Incinerators are clearly not renewable resources, and, by destroying natural resources that in

most cases could instead be recycled, thereby reducing reliance on raw materials to make new products, they actually lead to increased consumption of non-renewable energy.

By incentivizing and supporting disposal facilities that destroy California's resources, AB 655 undermines our commitment to waste prevention, recycling and composting. Facilities such as the ones in question rely on the same materials that many communities currently recycle. These facilities also displace cleaner solar, wind and other renewables that would otherwise be used to comply with the RPS, which would be counterproductive to the goal of helping to grow renewable energy industries in our state. If AB 655 passes and RPS eligibility is granted, for every kilowatt of power that is generated by these facilities (much of it from feedstock derived from fossil fuels), one less kilowatt will come from actual clean energy sources.

We urge you to uphold California's renewable energy standards and our efforts to conserve resources and prevent pollution and vote "NO" on AB 655.

Sincerely,

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Asamblea de Gonzales

Miya Yoshitani
Asian Pacific Environmental Network

Tom Frantz
Association of Irrigated Residents

Rebecca Roter
Breathe Easy Susquehanna County

Thomas Helme
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California Organic Recycling Council

John Dane
California Resource Recovery Association

Robina Suwol
California Safe Schools Coalition

Nick Lapis
Californians Against Waste

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Center for Biological Diversity

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Center for Environmental Health

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Central California Asthma Collaborative

Nayamin Martinez, MPH
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Dolores Weller
Central Valley Air Quality Coalition

V. John White
Clean Power Campaign

Andria Ventura
Clean Water Action

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Coalition for Clean Air

Luis Olmedo
Comite Civico del Valle

Janaki Jagannath
Community Alliance for Agroecology

Cynthia Babich
Del Amo Action Committee

Donna Charpied
Desert Protection Society

Kate Bailey
Eco-Cycle

Dan Jacobson
Environment California

Colin Bailey
Environmental Justice Coalition for Water

Lauren Ornelas
Food Empowerment Project

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Friends of the Earth

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Benjamin Kay
Team Marine

Stiv Wilson
The Story of Stuff Project

Marylia Kelley
Tri-Valley CAREs

CC: Members, Assembly Natural Resources Committee
Assembly Member Patrick O'Donnell