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Dear Wolf and CDPHE staff:

I'm writing in regards to CDPHE's recently released statewide materials management plan for Colorado. I am very supportive of the plan's focus to increase the amount of valuable materials diverted for recycling. A renewed focus on recycling and composting can create jobs, help local economies, reduce greenhouse gases and protect our environment.

In order for the plan to be fully implemented and successful, CDPHE will need to provide more leadership and technical assistance. Therefore, I strongly urge CDPHE to expand its mission and authority to include enforcement and funding of reuse, recycling and composting. Additionally, the plan needs timelines and priorities. Without them, the plan will not move forward. To start, Tier 1 options in the plan should be addressed no later than 2019.

Also, actions in the plan should be prioritized based on their impact to climate change. Reuse, recycling and composting provide cost-effective ways to reduce greenhouse gas emissions (GHG). We will need stronger goals than what is in the plan to get us moving forward. Colorado only recycled 12 percent of its waste in 2014 and the national average is 35 percent. We can do better and therefore I would like to see the state commit to higher, yet realistic goals:

- Front Range: 50% by 2026, 75% by 2036
- Rest of state: 25% by 2026, 50% by 2036

Another recommendation is to address market failures and the cheap costs of landfills. Current landfill tipping fees are too low and do not cover the full costs of operating and closing landfills properly to protect human health and the environment in compliance with state law. Increasing these costs to their full costs will make recycling a more economically viable option.

A major impediment to recycling and composting in Colorado is that it is underfunded. The single funding program, the Recycling Resources Economic Opportunity (RREO) fund only funds 10 percent of requests from local governments and other entities. The state needs to increase its funding in order to get our state moving toward a more robust recycling economy.

In addition, we need to expand compost in Colorado. So much of our food and yard waste goes to the landfill where it creates methane a greenhouse gas. If it is composted instead, it is used to return valuable nutrients to our local soils. CDPHE should prioritize the expansion of food waste composting infrastructure, starting first along the Front Range, as part of its Level 2 recommendations. Compost markets must also be strengthened and expanded to help grow organics recovery programs in Colorado.

The plan should also include bans on incineration (including pyrolysis and gasification). These technologies produce only a fraction of the energy that can be saved through recycling while emitting dangerous air pollutants and producing toxic ash. Incineration has been shown to emit more carbon dioxide emissions per megawatt hour than coal-fired power plants, and incineration is the most expensive form of electricity. It also supports far fewer jobs than recycling and composting.

Finally, CDPHE should require local municipalities to have closure plans for noncompliant landfills within two years and implement those within four years. National regulations have been in place since 1992. Colorado should be ashamed that many of our landfills do not meet basic regulations to protect public health and leaving rural communities at risk.

Thank you for your consideration,