

#6

LATE  
DIST

**Katherine Douglas** *Public Comment - Gaviota Coast Conservancy*

**From:** Ana Citrin <ana.citrin@gaviotacoastconservancy.org>  
**Sent:** Friday, December 8, 2023 10:11 AM  
**To:** sbcob  
**Subject:** Letter for Board, Item D.6  
**Attachments:** GCC to BOS\_Mustang Contract Termination\_12-8-23\_FINAL.pdf

**Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.**

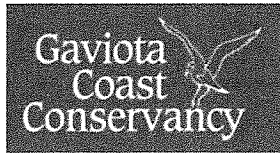
Dear Clerk,  
Attached please find a comment letter regarding the Tajiguas ReSource Recovery Center operator contract termination item on the Board's Tuesday hearing agenda.  
I plan to appear in person for the hearing.  
Best regards,  
Ana

--  
Ana Citrin  
Legal and Policy Director



(805) 570-4190

*CONFIDENTIALITY NOTICE: This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed, and may be confidential and legally privileged. If you have received this email in error please notify the sender and delete the original message and any copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this email is strictly prohibited.*



December 8, 2023

Santa Barbara County Board of Supervisors  
105 E. Anapamu Street, Suite 407  
Santa Barbara, CA 93101

. RE: Board Agenda Departmental Item No. 6, Hearing to Consider Termination of Contract with MSB Investors, LLC for Development and Operation of the Tajiguas ReSource Recovery Project

Dear Chair Williams and Honorable Supervisors,

The Gaviota Coast Conservancy (GCC) is committed to permanently protecting the rural character and environmental integrity of the Gaviota Coast for present and future generations. Along with rural character and environmental integrity, public access and recreational opportunities is the “third pillar” that together fulfills GCC’s mission. A key part of GCC’s mission is to encourage regenerative agriculture practices that build soil, manage water wisely, reduce toxic chemical use and support biological resources.

The Tajiguas Landfill and ReSource Center is located on the Gaviota Coast, situated between the Los Padres National Forest to the north, the Arroyo Hondo Preserve to the west, the County’s Baron Ranch to the east, and Highway 101 and the Arroyo Quemada residential community to the south. No landfill could be approved in such a sensitive location today, and GCC supports a vision for the Gaviota Coast that includes full closure and restoration of the Landfill, allowing the now-industrial facility to eventually harmonize with its rural and scenic setting, to provide important habitat, and establish missing trail linkages.

GCC objected strongly to the ReSource Center and supported a lower-tech, much more affordable, and more environmentally beneficial project to achieve the same objectives, supported by prominent experts in the solid waste field. Unfortunately, the County went forward with the proposed “dirty MRF” and Anaerobic Digestion Facility (ADF), instead of source separation of organic waste and traditional aerobic composting. While experts can disagree about the relative costs and benefits of each approach, it is now clear that the ReSource Center faces considerable operational, regulatory, and financial challenges. These challenges have contributed to the Tajiguas Landfill filling up much faster than anticipated, prompting the proposed physical expansion that is currently undergoing environmental review.

From the materials posted on the Board’s docket, it appears that there are ample grounds for termination of the County’s contract with MSB Investors, LLC. However, a new operator will not solve all the problems faced by the facility, many of which are more systemic in nature. First, the Municipal Solid Waste (MSW)-derived organic input for the ADF results in poor quality compost with elevated contaminants including glass and plastic. Second, there is insufficient space within the Compost Management Unit (CMU) to properly process and cure the compost product. These two factors have hindered ADF and CMU operations, and contributed to the

intolerable odors experienced by the residents of Arroyo Quemada and associated Notices of Violation (NOVs) from the CalRecycle Local Enforcement Agency (County Environmental Health) and Regional Water Quality Control Board (RWQCB) NOVs concerning “[u]se of unapproved feedstocks due to the inclusion of significant physical contaminants, including plastics and glass, which is prohibited by the Compost General Order” (Board Letter, Attachment C, PDF pp. 4, 9; see SWRCB General Order for Commercial Composting Operations (Order WQ 2020-0012-DWQ) (“Composting General Order”).

GCC has consistently advocated for changes to improve the quality of compost coming out of the ReSource Center. Application of high-quality compost improves soil tilth and plant health, increases soil water holding capacity, reduces runoff, adds beneficial micro-organisms, adds organic matter, and sequesters carbon. (See Composting General Order p. 6). In Santa Barbara County, there is an inadequate supply of high-quality compost available for local farms and ranches to fully realize these benefits including for carbon farming which fights climate change and advances the County’s Climate Action Plan goals. (See Gaviota District Carbon Management Plan<sup>i</sup>, p. 51.)

The MSW-derived compost produced by the ReSource Center is far below the standards of most farmers and ranchers for use on their land. The chemical and physical constituents of the compost are such that GCC is concerned that land application of the current ReSource Center compost could stunt plant growth, and contaminate soil and surface water.<sup>ii</sup> When the ReSource Center was approved the ADF was anticipated to produce two compost streams, one from the source separated organic waste (“SSOW”) that is currently collected from UCSB and City of Santa Barbara businesses, and one from the organic fraction of MSW. (See Tajiguas Resource Recovery Project EIR, p. 3-2.) Unfortunately, due to inadequate volumes of SSOW to fill a whole digester, the ADF has only produced one stream of compost. We specifically request that as the County negotiates new contracts and attempts to resolve NOVs, that it develop a plan, involving the participating jurisdictions, to increase SSOW collection with a near-term goal of having sufficient SSOW to run it separately through the ADF and CMU, and a longer-term goal of expanding to the extent feasible.

Thank you for the opportunity to comment on the termination of the contract with MSB Investors. We strongly believe that if we all work together we can yet find a way to make the ReSource Center operate effectively. We encourage the Public Works Department to select an operator who will create a high-quality compost, that PWD institutes an effective system that supports the public to separate their organic waste from the MSW, and finally, that PWD works with the public to find ways to reduce the generation of materials that must be dumped in a landfill.

Sincerely,



Ana Citrin  
GCC Legal and Policy Director

---

<sup>i</sup> Gaviota District Carbon Management Plan (Cachuma Resource Conservation District, March 2020), available at

<https://www.rcdsantabarbara.org/files/826bc123e/Gaviota+District+C+Management+Plan+final+March+2020.pdf>.

<sup>ii</sup> Scholarly articles and industry publications raising concerns about the quality of compost produced from MSW-derived organic waste include:

Policastro and Cesaro, *Composting of Organic Solid Waste of Municipal Origin: The Role of Research in Enhancing Its Sustainability* (International Journal of Environmental Research and Public Health, 2023, 20, 312).

Wei, et al. *Environmental challenges impeding the composting of biodegradable municipal solid waste: A critical review* (Resources, Conservation and Recycling, 2017, 122, 51);

*Microplastics in Compost: Environmental Hazards of Plastic-Coated Paper Products* (Woods End Laboratories and Eco-Cycle, updated 2018).