

**Jackie Lang**  
**Senior Manager for Public Affairs and Communications**  
**Waste Management – Arlington**  
**18177 Cedar Springs Lane**  
**Arlington, OR 97812**

- Good afternoon. My name is Jackie Lang. I manage public affairs for Waste Management across the Pacific Northwest. I am here today to represent the Waste Management facility, just down the road at Arlington in Gilliam County.
- Waste Management is the largest recycler in North America and is recognized as a climate change leader. We are also in the landfill business. Our landfill at Arlington is a state-of-the-art facility engineered with overlapping environmental protection systems that meet or exceed rigorous state and federal regulations.
- The Cap and Trade discussion is important, and uniquely complex as it relates to landfills.
- A basic element of a “Cap and Trade” system is the ability to provide ACCURATE MEASUREMENTS of emissions. Accurate measurements are needed to ensure the accountability and integrity of allowances that can be “capped” and “traded.”
- Accurate measurements are reliable from point sources. An example would be “stack emissions” gases and solids that can be measured at the smoke stack after the incineration process.
- Landfills are different!
- Yes, we can accurately and continuously measure landfill gas that is collected and used to generate renewable energy. But the technology does not exist to accurately and continuously measure surface emissions at landfills.
- Landfills are large, complex operations that often cover many acres of land. There’s no single “emission point” or “point source.” That’s essentially why EPA uses its Landfill Gas Emission Model to assess how emissions change over time – but not as a COMPLIANCE measure. EPA acknowledges that their model allows for significant uncertainty – because of the nature of landfills.

And this is why landfills like the Waste Management facility at Arlington should not be included in the Cap and Trade program – because Cap and Trade requires that greenhouse gas emissions be measured with certainty, and surface emissions from landfills are not specifically and accurately measured.

Also, HB 2020 does not consider a significant benefit provided landfills – the sequestration of carbon. If you think landfills should be part of the “Cap and Trade” discussion, that’s where the focus is needed – on the important benefits of carbon sequestration.

Thank you for your consideration.