Steve Church  
Research Division  
California Air Resources Board  
1001 I Street, PO Box 2815  
Sacramento, CA 95812

Re: Waste Reduction and Recycling in the ETAAC Draft Report

Dear Mr. Church:

The California Refuse Removal Council (CRRC) is a statewide non-profit trade association comprised of over 120 companies involved in the collection and processing of organic materials that also operate approximately 20 composting facilities, 50 material recovery facilities (MRFs), 25 construction and demolition debris processing facilities, and over 12 landfills statewide. Our industry, in partnership with local government, has been instrumental in our state's efforts to attain the recycling mandate of 50% waste diversion from landfills, required by the California Integrated Waste Management Act of 1989 (AB 939), and will remain critical to the attainment of future sustainable goals.

The purpose of this correspondence is to convey support for the inclusion in the December 21, 2007, ETAAC report discussion draft of recommendations that promote increased recycling and compost use. Additionally, an issue paper is attached, the objective of which is to establish a credible suite of reporting protocols to measure the GHG emission reduction benefits due to recycling, composting, and biomass energy feedstock production to assist local government and businesses in determining their carbon footprint. This paper is meant to provide a basis for discussion leading to a Recycling and Waste Diversion Reporting Protocol.
Should you have any questions, please contact me at (916) 739-1200.

Sincerely,


Evan W.R. Edgar, Principal
Edgar & Associates, Inc
For the California Refuse Removal Council