

Comment 1 for Report of the Economic and Technology Advancement Committee (etaac08) - Non-Reg.

First Name: Debra

Last Name: Kaufman

Email Address: dkaufman@stopwaste.org

Affiliation: StopWaste.Org

Subject: Support for recycling/composting element of report

Comment:

We are pleased to see that the report recognizes the important role that recycling and composting can play in mitigating California's GHG. We especially lend our support to measures J, K, L, M and N contained in Chapter 4 on Waste Reduction, Recycling and Resource Management. These measures are critical to supporting and expanding the state's existing recycling and composting infrastructure, and are relatively low cost, environmentally sound methods of achieving greenhouse gas reductions.

More specifically, we are highly supportive of the following measures:

- Development of recycling and composting protocols for quantifying and reporting emission reductions.
- Support for commercial recycling
- Removing barriers to composting..
- Phase out diversion credit for green waste used as alternative daily cover at landfills
- Reducing agricultural emissions through the use of compost

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2008-02-22 15:06:24

No Duplicates.

Comment 2 for Report of the Economic and Technology Advancement Committee (etaac08) - Non-Reg.

First Name: Mike
Last Name: Mohajer
Email Address: MikeMohajer@yahoo.com
Affiliation: LA Co IWM Task Force

Subject: 2/28/08 CARB Meeting, Item 08-2-6...ETAAC Report
Comment:

-----Original Message-----

From: Mike Mohajer [mailto:mikemohajer@yahoo.com]
Sent: Sunday, February 24, 2008 4:10 PM
To: Mary Nichols; CARB Board Members
Cc: James Goldstene; Steve Church; Margo Reid Brown; Wesley Chesbro; Jeffrey Danzinger; Rosalie Mule; Cheryl Peace; Gary Petersen
Subject: 2/28/08 CARB Meeting, Item # 08-2-6 ---- Report of the Economic and Technology Advancement Advisory Advancement Committee

Madam Chair and Members of the Board,

On behalf of the Los Angeles County Integrated waste Management Task Force (Task Force), I want to thank you the California Air Resource Board (CARB) for the opportunity to comment on the February 11, 2008 final report entitled Technologies and Policies to Consider for Reducing Greenhouse Gas Emissions in California, which was prepared by the CARB's Economic and Technology Advancement Advisory Committee (ETAAC) and released to the public by your Board on February 18, 2008. I also want to commend the ETAAC's Members for their considerable efforts in preparation of the subject report and its recommendations on such a short time frame established by the California Global Warming Solution Act of 2006 (AB 32). Such a short time frame may be the cause for a number of recommendations by the ETAAC in regards to our state integrated solid waste management (ISWM) system which have been formulated without any scientific basis and/or a balance objective to ensure a net reduction in greenhouse gas (GHG) emissions. The following provides a brief list of our initial concerns which are being provided on an interim basis due to the short time frame since this matter is set for your Board consideration on February 28, 2008.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and its 88 cities in Los Angeles County with a combined population in excess of 10 million. Consistent with these responsibilities, and to ensure a coordinated and cost-effective and environmentally-sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a Countywide basis. The Task Force

membership includes representatives of the League of California Cities-Los Angeles County Division, the County of Los Angeles Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

I. The Task Force strongly supports recycling as an important element of our ISWM system and recognizes its value in reducing our dependence on disposal options. However, without having a full and complete economic and environmental life-cycle analysis for this technology, it is scientifically not possible to measure reductions or increases in GHG emissions resulting from recycling activities. Additionally, the California recycling industry is very complex and extends beyond the California and the U.S. boundaries to foreign countries. A number of Pacific Rim countries play a major role in providing a market for our recyclable materials. However, environmental laws and regulations in some of these countries are non-existent as compared to California. It should also be recognized that there are no jurisdictional boundaries that would limit the movement of air contaminants (including GHG) from these countries to California negatively impacting our air quality and well being of our residents. This is a critical concern which further substantiate the need for the state to take the lead in conducting a complete life-cycle analysis for our recycling option as it has been recommended by the Task Force for many years.

Based on the foregoing and without any consideration by the ETAAC for the economic impacts on local governments, the Task Force respectfully disagrees with the report recommendations for increases in the recycling rate by an additional 25 percent by 2012 as currently proposed by Senate Bill 1020 (Padilla).

II. The Task Force has a long track record of supporting initiatives that promote producer responsibility because of its major role in reducing commercial/manufacturing waste as well as its positive impact on the reduction of energy consumption and potential reduction in GHG emission. As such, we appreciate the report's acknowledgement of the subject but at the same time disappointed by the lack of any analysis by the ETAAC. Producer responsibility impacts all aspects of our ISWM system, and therefore, it warrants much more consideration.

III. Without conducting any analysis or estimation of GHG emissions, the report incorrectly claims that composting would avoid the generation and emission of methane gas as compared to other disposal options. While the Task Force is in support of composting, we do not believe the development of composting facilities in metropolitan/urbanized areas is a valid ISWM option

unless composting activities are conducted in enclosed facilities that operate under negative pressure to control odors and ensure air quality in protecting health and safety of neighboring residents. Additionally, a complete economic and environmental life-cycle analysis on the composting option needs to be conducted to verify the validity of the recommendations.

For many years, the Task Force has been an advocate for the state to take a proactive role in developing markets for composted products. We are pleased that the ETAAC has arrived at the same conclusion.

IV. The Task Force disagrees with the report's claim that greenwaste is not an effective material for use as a landfill alternative daily cover (ADC). Prior to its approval by the appropriate regulatory agencies, a series of field testing and demonstration activities were conducted to substantiate that greenwaste when used as ADC meets all performance and health and safety criteria established by the California Integrated Waste Management Board. As such, the report's claim is unfounded.

The Task Force also strongly opposes the report's recommendation to phase out the diversion credit for use of greenwaste as a landfill ADC on the basis that such a use would divert green materials from composting activities. Again, such a claim is unfounded and it is contrary to the report's finding (Chapter 4, Pg 4-17) that currently over 12 million tons of compostable organics are being disposed in landfills on an annual basis and would be available for the composting option.

V. The Task Force is very pleased with the ETAAC findings as discussed in Chapters 4, 5 and 6, and Appendix IV of the report that the existing barriers, including but not limited to legislative and regulatory, have significantly hindered the development of conversion technologies in California and that they need to be addressed.

The Task Force has been a strong supporter of conversion technologies and played a major role which resulted in the enactment of AB 2770 in 2002. AB 2770 specifically required the California Integrated Waste Management Board to conduct a study, including life-cycle analysis, to verify the viability of these technologies as an element of our ISWM system and provided a funding in the amount of \$1.5 million for the required study. The result of the 3-year study which was conducted in concert with campuses of the University of California at Davis and Riverside substantiated the viability of these technologies as an ISWM option while producing renewable energy to reduce our dependence

on fossil fuel and reducing GHG emission. Unfortunately, the ETAAC's report failed to make any reference to the findings of the subject study .

Since 2003, the Task Force has further expanded its activities with the County of Los Angeles for the development of a pilot demonstration facility in Southern California. As a part of this effort, the Task Force has also visited a number of existing conversion technology facilities in Europe and Japan to insure the viability of these facilities for California. While our findings further substantiate the viability of these facilities, we continue to maintain our position that the state must take the leadership as well as a proactive and visible role in removing the existing legislative and regulatory barriers to the development of these technologies in California.

Based on the results of the AB 2770 study and our site visits and investigation, there are over 200 conversion technology facilities currently operating in Europe and Japan using municipal solid waste as their feedstock. As such, we were dismayed by the report's recommendation (Chapter 6, pp 6-8 & 6-20) that conversion technology facilities using post-recycled solid waste residuals need to be significantly treated differently as compared to those facilities that use "agricultural waste" as feedstock. Needless to say, we are opposed to the said proposal. The criteria should be based on performance and compliance with required rules and regulations and not on a "government policy" to pick a technology/feedstock winner.

The Task Force is looking forward to the opportunity to work with the CARB and other appropriate agencies to ensure an environmentally and economically viable ISWM system that is protective of our citizens' health and safety as well as our natural resources.

Thank you again for the opportunity to submit these initial comments. Should you have any question, please contact me at 909-592-1147.

Regards,

MIKE MOHAJER, Member
LA County Integrated Waste Management Task Force
mikemohajer@yahoo.com
P.O.Box 3334, San Dimas, CA 91773-7334

cc: Each Member of the California Integrated Waste Management Board

Each Member of the Los Angeles County Integrated Waste
Management Task Force

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2008-02-25 12:33:45

No Duplicates.

Comment 3 for Report of the Economic and Technology Advancement Committee (etaac08) - Non-Reg.

First Name: Christopher

Last Name: Perkins

Email Address: c.perkins@skytran.net

Affiliation: Unimodal Systems

Subject: State of California Personal Rapid Transit Pilot Demonstration Project Letter
Comment:

No solution should be spared in the effort to combat global climate change.

There is growing support across California for the development of personal rapid transit as a solution to this crisis. The attached document lays out the case for a State of California funded Personal Rapid Transit Pilot Demonstration Project to assess greenhouse gas mitigation effectiveness, the viability of expanded deployments to improve public transit service, and the potential for congestion reduction.

Attachment: 'www.arb.ca.gov/lists/etaac08/3-prt_pilot_demo_project__final_2-8-08_.pdf'

Original File Name: PRT Pilot Demo Project (Final 2-8-08).pdf

Date and Time Comment Was Submitted: 2008-02-26 16:13:25

No Duplicates.

**Comment 4 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Muriel

Last Name: Strand

Email Address: auntym@earthlink.net

Affiliation: citizen

Subject: Comments on ETAAC Report

Comment:

see attached file

Attachment: 'www.arb.ca.gov/lists/etaac08/4-to_carb_re_etaac.doc'

Original File Name: to carb re etaac.doc

Date and Time Comment Was Submitted: 2008-02-27 06:54:45

No Duplicates.

Comment 5 for Report of the Economic and Technology Advancement Committee (etaac08) - Non-Reg.

First Name: Krista
Last Name: Clark
Email Address: kristac@acwa.com
Affiliation: ACWA

Subject: ETAAC report
Comment:

Attached are comments from the Association of California Water Agencies (ACWA) on the final report of the Economic and Technology Advancement Advisory Committee (ETAAC).

If there are any questions or if there is a problem with the attachment, please contact me at kristac@acwa.com or 916-441-4545.

Attachment: 'www.arb.ca.gov/lists/etaac08/5-etaac_comments.doc'

Original File Name: ETAAC Comments.doc

Date and Time Comment Was Submitted: 2008-02-27 09:25:20

No Duplicates.

Comment 6 for Report of the Economic and Technology Advancement Committee (etaac08) - Non-Reg.

First Name: Mark

Last Name: Gagliardi

Email Address: mgagliardi@oaklandnet.com

Affiliation: City of Oakland

Subject: ETAAC REPORT, Waste Reduction, Recycling and Resource Management
Comment:

Please distribute attached letter regarding Feb 28, 2008 ARB Meeting Agenda Item #08-2-6 to ARB Board members in advance of the Feb 28, 2008 meeting.

Thank you.

Attachment: 'www.arb.ca.gov/lists/etaac08/6-etaac_2-28-08_arb_comments_oakland.pdf'

Original File Name: ETAAC_2-28-08_ARB_Comments_Oakland.pdf

Date and Time Comment Was Submitted: 2008-02-27 10:58:52

No Duplicates.

**Comment 7 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Hans

Last Name: Kernkamp

Email Address: hkernkam@co.riverside.ca.us

Affiliation: Riverside County Waste Management Dept.

Subject: ETAAC Report

Comment:

Attached please find comments on the ETAAC report from Riverside
County Waste Management Department.

Attachment: 'www.arb.ca.gov/lists/etaac08/7-etaac_letter.pdf'

Original File Name: ETAAC Letter.pdf

Date and Time Comment Was Submitted: 2008-02-27 11:56:01

No Duplicates.

**Comment 8 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Jack

Last Name: Macy

Email Address: jack.macy@sfgov.org

Affiliation:

Subject: Comment letter to CARB on ETAAC Report

Comment:

Please see attached comment regarding ETAAC Report to CARB. Thank
you.

Attachment: 'www.arb.ca.gov/lists/etaac08/8-etaac_report_letter_from_sfe___norcal_2-27-
08.pdf'

Original File Name: ETAAC Report letter from SFE & Norcal 2-27-08.pdf

Date and Time Comment Was Submitted: 2008-02-27 11:58:40

No Duplicates.

**Comment 9 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Paul

Last Name: Yoder

Email Address: Non-web submitted comment

Affiliation:

Subject: SWANA Solid Waste Association

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/etaac08/9-eta0002.pdf'

Original File Name: eta0002.pdf

Date and Time Comment Was Submitted: 2008-02-27 12:47:38

No Duplicates.

**Comment 10 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Karen

Last Name: Smith

Email Address: Non-web submitted comment

Affiliation:

Subject: Stop Waste. Org

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/etaac08/10-eta0003.pdf'

Original File Name: eta0003.pdf

Date and Time Comment Was Submitted: 2008-02-27 12:48:33

No Duplicates.

**Comment 11 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Nick

Last Name: Lapis

Email Address: nicklapis@cawrecycles.org

Affiliation:

Subject: Joint Letter on Water Reduction and Recycling

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/etaac08/11-etaac.pdf'

Original File Name: etaac.pdf

Date and Time Comment Was Submitted: 2008-02-27 14:29:43

No Duplicates.

**Comment 12 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Frank

Last Name: Harris

Email Address: Non-web submitted comment

Affiliation:

Subject: Edison International

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/etaac08/13-08-2-6_frank_harris.pdf'

Original File Name: 08-2-6 Frank Harris.pdf

Date and Time Comment Was Submitted: 2008-03-04 15:49:38

No Duplicates.

**Comment 13 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Scott

Last Name: Smithline

Email Address: Non-web submitted comment

Affiliation:

Subject: Californians Against Waste

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/etaac08/14-08-2-6_scott_smithline.pdf'

Original File Name: 08-2-6 Scott Smithline.pdf

Date and Time Comment Was Submitted: 2008-03-04 15:50:16

No Duplicates.

**Comment 14 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Muriel

Last Name: Strand

Email Address: Non-web submitted comment

Affiliation:

Subject: Muriel Strand

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/etaac08/15-08-2-6_muriel_strand.pdf'

Original File Name: 08-2-6 Muriel Strand.pdf

Date and Time Comment Was Submitted: 2008-03-04 15:50:59

No Duplicates.

**Comment 15 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Rick

Last Name: Ruiz

Email Address: Non-web submitted comment

Affiliation:

Subject: Capstone Turbine Corporation

Comment:

Pamphlet included too large to scan
please see attached

Attachment: 'www.arb.ca.gov/lists/etaac08/16-08-2-6_rick_ruiz.pdf'

Original File Name: 08-2-6 Rick Ruiz.pdf

Date and Time Comment Was Submitted: 2008-03-04 15:52:02

No Duplicates.

**Comment 16 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Leah

Last Name: Fletcher

Email Address: Non-web submitted comment

Affiliation:

Subject: Natural Resources Defense Council

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/etaac08/17-08-2-6_leah_fletcher..pdf'

Original File Name: 08-2-6 Leah Fletcher..pdf

Date and Time Comment Was Submitted: 2008-03-04 16:02:52

No Duplicates.

**Comment 17 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Steve

Last Name: Lehtonen

Email Address: Non-web submitted comment

Affiliation:

Subject: Green Plumbers

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/etaac08/19-08-2-6_steve_1.pdf'

Original File Name: 08-2-6 Steve L.pdf

Date and Time Comment Was Submitted: 2008-03-04 16:15:56

No Duplicates.

**Comment 18 for Report of the Economic and Technology Advancement
Committee (etaac08) - Non-Reg.**

First Name: Kevin

Last Name: Whilden

Email Address: Non-web submitted comment

Affiliation:

Subject: Climos

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/etaac08/20-08-2-6_kevin.pdf'

Original File Name: 08-2-6 Kevin.pdf

Date and Time Comment Was Submitted: 2008-03-04 16:18:18

No Duplicates.

**Comment 1 for Report of the Economic and Technology Advancement
Committee (etaac08). (At Hearing)**

First Name: Chuck

Last Name: Helget

Email Address: chuckhelget@msn.com

Affiliation:

Subject: Solid Waste Industry for Climate Solutions

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/etaac08/12-etaac.zip

Original File Name: etaac.zip

Date and Time Comment Was Submitted: 2008-03-04 14:46:55

No Duplicates.