



StopWaste is the Alameda County Waste Management Authority, the Alameda County Source Reduction and Recycling Board, and the Energy Council operating as one public agency.

Member Agencies:

- Alameda County
- Alameda
- Albany
- Berkeley
- Dublin
- Emeryville
- Fremont
- Hayward
- Livermore
- Newark
- Oakland
- Piedmont
- Pleasanton
- San Leandro
- Union City
- Castro Valley Sanitary District
- Oro Loma Sanitary District

November 1, 2013
Michael Tollstrup
California Air Resources Board
1001 I Street
Sacramento, California 95814
Subject: Climate Change Scoping Plan Update Discussion Draft

Thank you for the opportunity to comment on the discussion draft of the First Update to the Climate Change Scoping Plan (Update). StopWaste is a public agency responsible for reducing waste in Alameda County. The agency helps local governments, businesses, schools and residents reduce waste through source reduction, market development, technical assistance and public education. StopWaste is governed jointly by three Boards: the Alameda County Waste Management Authority, the Alameda County Source Reduction and Recycling Board, and the Energy Council.

We have done research connecting the materials management sector to local government Climate Action Plans, energy programs, green building programs, and many other programs related to the strategies listed in the Implementation plan. We are actively working on sustainable packaging, reusable transport packaging, better recyclability labeling, recycled content building materials, and EPP policies.

We commend the collaborative effort between ARB and CalRecycle, and support the following developments in the Waste Management Sector Plan and the Waste section of the Update:

- Revision of emissions reduction factors to better account for the non-energy benefits of recycling and composting
- Consideration of upstream (out-of-state) GHG impacts of waste reduction strategies
- Funding for low-carbon diversion infrastructure including new composting facilities
- Prioritization of organics and "readily recyclable" materials via the hierarchy of reduce, reuse, recycle
- Eliminating ADC being classified as diversion

We submit recommendations on specific discussion draft sections.

Page 40 – Footnote

We support the quantification of upstream GHG benefits of waste reduction strategies. As indicated on page 40 of the discussion draft, much of the GHG reduction benefits of waste strategies occur outside of California. Even if exact numbers cannot be established, use of orders of magnitude should be used to inform measure prioritization.

1537 Webster Street
Oakland, CA 94612

p 510-891-6500
f 510-893-2308

www.stopwaste.org

Page 49 – Figure 5

Include Waste Sector emissions trends

Page 99 – Key Recommended Action for Waste Sector

Consider adding the following bullets:

- *Support food waste prevention strategies in high volume food production and preparation facilities.* The recent United Nations Food and Agriculture Organization report *Food Wastage Footprint* highlights the importance and impact of pre and post consumer food waste. Much of the GHG emissions that can be avoided through food waste prevention occur in California and cross-cut several sectors.
- *Increase the prominence of recycled content in CALGreen building codes.* The green building code (CALGreen) could elect to make recycling measures stronger and/or mandatory in future versions of the code. Currently, the CALGreen Voluntary Tiers includes a Recycled Content Products measure, which should be moved to the mandatory section of the code. In addition, codes can address LCA analysis of products, such as Environmental Product Declarations (EPDs) and Sustainable product criteria (SPCs).
- *Support market development for local compost and mulch products.* The composting industry requires a strong market to support its growth. Compost and mulch also supports water conservation and habitat development, climate change mitigation and adaptation strategies.

Consider revising the following bullets:

- *Explore funding mechanisms and partner with economic development initiatives to accomplish GHG and waste reduction goals, and to build adequate recycling manufacturing and composting/anaerobic digestion infrastructure for non-landfill alternatives.*
- *Develop more accurate GHG emission factors that reflect more comprehensive lifecycle GHG impacts for various materials, processes, and landfill emissions.*
- *Initiate a public education campaign to promote the carbon reduction benefits of increased waste diversion, ~~and~~ recycling- and buying recycled content and low-emitting products. Pursue ways to increase funding for recycling education over the long term. We understand the need for short term public education campaigns at the state level, but also know that our agency has benefitted greatly from behavior change due to in-classroom education on recycling for k-6 students. These programs fit well within the state's eco-literacy goals, and are a strong driver for long term behavior change towards better materials management in California.*

We offer the following additional comments for consideration by the CalRecycle/ARB collaboration:

- In refining State procurement policies for recycled content, consider ways to prioritize locally produced recycled content products (such as in SABRC). Specifically, the State procurement process could promote or incentivize products manufactured or sourced from regionally collected materials.

- Industry and local regulatory trends support the State’s ability to declassify C&D ADC as “recycling”. LEED, GreenPoint Rated, and the national green building codes are moving away from classifying construction and demolition (C&D) alternative daily cover (ADC) as “recycling”.
- Local governments and green rating systems are beginning to encourage or require third party verification of mixed-construction-waste recycling facility diversion rates. Local governments see this as an important development as it helps with enforcement of C&D ordinances and other locally adopted ordinances that regulate construction waste recycling. As a result, the construction industry will seek non-ADC disposal and demand more rigorous reporting of waste processing facilities. The standard we reference is from the Recycling Certification Institute, or www.recyclingcertification.org.

We are ready to provide more information on our comments and assist staff on any revisions or analysis resulting from our comments.

Sincerely,

A handwritten signature in black ink that reads "Wendy Sommer". The signature is written in a cursive, flowing style.

Wendy Sommer
Principal Project Manager
StopWaste