



August 11, 2008

Mary D. Nichols, Chairman
California Air Resources Board
1001 I Street
Sacramento, CA 95812
(916) 445-5025 (Fax)

RE: Draft Scoping Plan Comments – Recycling & Waste Management

Dear Chairman Nichols,

Environmental Defense Fund (EDF) applauds the California Air Resources Board (CARB) on the release of the *Climate Change Draft Scoping Plan: A Framework for Change*. The draft Scoping Plan represents an important milestone in California's implementation of the landmark Global Warming Solutions Act of 2006 (AB 32), the first state-level cap on the greenhouse gas pollution that causes global warming.

EDF respectfully submits the following comments in response to the draft Scoping Plan, and looks forward to collaborating with CARB and other stakeholders in the coming months as further materials, including the evaluation supplements, are made available.

Sincerely,

Derek Walker
Director, California Climate Initiative
Environmental Defense Fund

Waste Management and Recycling Sector

Managing waste to reduce greenhouse gas emissions requires action at all levels of the waste handling chain from waste generation, collection and handling to intermediate and final disposal. Environmental Defense Fund fully supports the single required measure in the draft Scoping Plan that is a proven and effective strategy to reducing emissions associated with waste: improving landfill methane control. We also recommend CARB move towards mandatory action rather than stating aspirational goals in the areas of increasing diversion, recycling and composting.

In addition to specific landfill gas collection and control requirements implemented through discrete early action measures, Environmental Defense Fund views other programs implemented under the final Scoping Plan (e.g. increasing the Renewable Portfolio Standard, the Low Carbon Fuel Standard, and allowing offsets) as important tools to reduce emissions from the waste handling system. Therefore, we recommend the draft Scoping Plan identify and highlight the interactions of these other strategies with the waste handling sector to provide a more robust discussion of opportunities for emission reductions. Specifically, Environmental Defense Fund believes the RPS can push a larger proportion of the state's electricity to be made from landfills utilizing landfill gas to energy; the LCFS can reward landfills that construct and operate landfill gas to transportation fuels (LNG) systems; and offsets can reward waste handlers who engage in effective diversion programs once necessary accounting protocols are developed.

While Environmental Defense Fund supports the measures identified above, we also support expanding existing tools and developing new tools to decrease emissions from the waste sector. Therefore, we see the creation of financial mechanisms to facilitate landfill gas to energy projects, increasing composting and commercial recycling, and establishing extended producer responsibility as important measures for CARB to implement. These mechanisms all have potential to reduce emissions both on and off the landfill surface and can also create new economic opportunities and energy savings. In addition, Environmental Defense Fund recommends that CARB evaluate other measures identified in the ETAAC report.

We acknowledge that resource and time constraints prevent CARB from implementing every measure identified for the waste management sector. However, Environmental Defense Fund believes that implementing the measures identified have the potential to both reduce emissions and create public awareness of efforts the state is taking to combat global warming. Measures such as these will help build public support for AB 32 and should be vigorously pursued wherever possible.