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**NORCAL WASTE SYSTEMS, INC.**

January 17, 2008

Alan C. Lloyd, Ph.D., Chair  
Economic and Technology Advancement Advisory Committee  
California Environmental Protection Agency  
1001 I Street,  
Sacramento, CA 95814

RE: Comments on waste reduction section of 12/21/07 draft ETAAC report

Dear Chair Lloyd,

We would like to express our strong support for ETAAC's inclusion of the following measures in the "Waste Reduction, Recycling and Resource Management" section of your December 21 discussion draft:

- J. Develop protocols for recycling, but expand to include waste reduction as well as composting,
- K. Increase commercial sector recycling,
- L. Remove barriers to composting,
- M. Phase out of diversion credit for greenwaste as Alternative Daily Cover, and
- N. Reduce agricultural emissions through composting.

As you are well aware, climate change is upon us and we have a very limited window in which to develop the principles and framework that will guide the State forward to achieving dramatic GHG reductions by mid century. We believe that by prioritizing the above measures in your report you are taking a significant step towards ensuring that the path we choose for addressing waste related greenhouse gas emissions yields the maximum possible GHG reductions.

To recap some of the benefits, waste reduction, recycling and composting all lead to reductions in methane emissions from the landfill as well as upstream energy use and pollution associated with virgin resource extraction and manufacturing. Composting plays a critical role in fostering local sustainable agriculture efforts, which further reduces emissions, such as from reduced irrigation, fertilizer and pesticide use, related to our food production and distribution. Both recycling and composting provide significant opportunities for green collar jobs in communities.

In regards to the report's section on "Waste Conversion Evaluation" we urge that technologies being considered under this heading be dealt with on an individual basis and in comparison to recycling and composting alternatives. Many of these technologies are highly questionable, especially high temperature material destruction processes, however without inclusion of detail on the types of technologies under consideration it is impossible for us to state our support or objection to specific strategies in this category.

Thank you and the Committee again for your work in moving California's climate policy forward.

Sincerely,

Jared Blumenfeld, Director  
Department of the Environment  
City and County of San Francisco

Sincerely,

Rachel Oster  
Planning Coordinator  
Norcal Waste Systems, Inc.