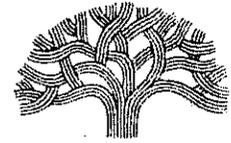




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January 18, 2008

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

RE: Comments on 12/21/07 draft ETAAC report

Dear Chair Lloyd,

Thank you and the Committee for the opportunity to provide input to the important work of moving forward California's climate protection policy. We would like to express our:

1. Support for the strategies listed in Section 4.IV.J through N, beginning on page 4-13 of the December 21, 2007 discussion draft report in the "Waste Reduction, Recycling and Resource Management";
2. Strong encouragement for adding Source Reduction and Reuse strategies to the report; and
3. Concern that any waste-based energy technologies and feedstocks under consideration be addressed on an individual basis and in a full life-cycle comparison to source reduction, reuse, recycling and composting alternatives.

First, we would like to express our support for the following strategies listed in Section 4.IV.J through N, beginning on page 4-13 of the December 21, 2007 discussion draft report in the "Waste Reduction, Recycling and Resource Management" section:

- J. Develop Suite of Emission Reduction Protocols for Recycling**
- K. Increase Commercial-Sector Recycling**
- L. Remove Barriers to Composting**
- M. Phase Out Diversion Credit for Greenwaste Alternative Daily Cover Credit**
- N. Reduce Agricultural Emissions through Composting**

Prioritizing the above measures will be a significant step toward GHG reductions.

Second, we offer our strong encouragement to add Source Reduction and Reuse strategies to the report. It appears that the "Waste Reduction, Recycling and Resource Management" section of the report overlooks the maximum GHG reduction impact strategies, as it focuses only on end-of-the-pipeline recycling and composting strategies, which are at the 3rd level of resource conservation priority in the Reduce-Reuse-Recycle hierarchy.

Reusing materials and repairing, refurbishing, and rehabilitating existing products and buildings so as to retain their form and function (and thus embodied energy) holds the potential for:

- substantially greater GHG reductions than recycling and composting alone
- creating 'green collar' jobs producing value-added contributions to the state's economy

Reuse strategies significantly reduce, or in some cases eliminate, repetition of multiple carbon-emitting processes in raw material extraction, processing, and transformation, and the manufacture, and transport of finished products along the entire supply chain to consumers. Source Reduction and Reuse also reduce the GHG emissions created by collecting and shipping discarded materials and products (often great distances) to disposal or recycling facilities.

Regarding the Source Reduction strategy, there is significant potential for GHG reduction through more efficient product packaging, distribution, and public education. Excessive and bulky packaging methods consume large amount of energy in production, transportation and disposal. Shipping bulkier packages requires larger modes of transportation at all stages, which in turn increases GHG emissions.

We suggest:

- Expanding Section 4.IV.J (Develop Suite of Emission Reduction Protocols for Recycling) to include composting, Source Reduction, and Reuse
- Adding specific Source Reduction and Reuse strategies

Finally, regarding strategy 4.IV.O "Waste Conversion Evaluation" we urge that any waste conversion technologies under consideration be addressed on an individual basis and in a full life-cycle comparison to source reduction, reuse, recycling and composting alternatives. Many of these waste conversion technologies have highly questionable net energy balances, especially high temperature material destruction processes applied to non source-separated, mixed feedstocks.

Similarly, we are concerned with the first sentence of the discussion of "Biomass and Waste" in Section 5.II.C on page 5-11, which indicates that there is great unrealized potential for municipal waste to be "converted into clean energy in California." We urge that mixed municipal solid waste be excluded from consideration for energy recovery, and that any other feedstock be evaluated in a full life-cycle comparison to source reduction, reuse, recycling and composting alternatives.

We appreciate the Committee's work in moving forward California's climate protection policy.

Sincerely,



Susan Kattchee

Environmental Services Manager