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Alan C. Lloyd, Ph.D., Chair
ETAAC
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95814

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

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Dear Mr. Lloyd,

Thank you for the opportunity to comment on the draft ETAAC report. It is an impressive piece of work and we applaud the tremendous effort that went into it as well as the overall effort going into helping California reduce its greenhouse gas emissions.

We are pleased to see that the draft has been revised to include recycling and composting measures that were missing from the previous draft. 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. We propose adding to L, assistance with the development of additional permitted compost processing capacity.
- Phase out diversion credit for green waste used as alternative daily cover at landfills
- Reducing agricultural emissions through the use of compost

We express some concern, however, with measure 4. IV O related to the development of policies to encourage the development and implementation of waste conversion technologies. With the exception of anaerobic digestion, until these technologies have proven themselves to be environmentally benign and practical, the state should not be developing policies to implement them.

We especially urge the state to provide permitting assistance for the development and expansion of composting facilities around the state. California needs more permitted composting capacity. The generation of more high quality compost would not only reduce methane emissions in the landfill, but also contribute to greenhouse gas reductions in a variety of other ways (reduced fertilizers, pesticides, water conservation, increased crop yield). We look to the state for assistance with additional permitted compost processing capacity to achieve the multiple greenhouse gas benefits associated with the use of compost. Composting is not only a proven technology, but also appears to be one of the least expensive and environmentally beneficial, for the organic fraction of the waste stream.

Thank you for the opportunity to comment.

Sincerely,

Karen Smith
Executive Director