

Subject: Comments on ETAAC report

From: Debra Kaufman <dkaufman@stopwaste.org>

Date: Tue, 27 Nov 2007 17:05:08 -0800

To: schurch@arb.ca.gov

Thank you for the opportunity to comment on the ETAAC report. It's an impressive piece of work.

Our Agency would like to see the report address the need for expanding statewide composting capacity for green waste and food waste. Despite permitting challenges, composting facilities have proven themselves to be a lower-cost, more environmentally benign alternative to waste to energy technologies such as gasification and pyrolysis which have unknown environmental and health risks. We encourage a focus on expanding existing recycling and composting infrastructure to take advantage of collection programs that are already in place in many communities (residential food waste composting is available to 1 million residents in Alameda County) and could be easily expanded. While compost isn't "energy" per se, it has many energy conserving properties as noted in the report and it also has significant GHG reducing potential. Compost can also play a critical role in preserving California's soil quality which is expected to deteriorate as a result of climate change.

We encourage ETAAC to recommend investments in composting technologies to expand the capacity to compost organics. At a recent CIWMB event, a number of counties in addition to our own noted local compost processing capacity shortages. These counties included S.F., Marin, Sonoma, San Mateo, and Monterey. In addition to supporting the expanded use of anaerobic digestion for organics, and methane recovery from landfills, we encourage the ETAAC to promote *assistance in the form of siting, permitting and financing for compost processing facilities*. This appears to be the least expensive technology solution, and one of the most environmentally beneficial, for the organic fraction of the waste stream. Thank you for the opportunity to comment.

Debra Kaufman

Senior Program Manager

StopWaste.Org

1537 Webster Street
Oakland, CA 94612
(510) 891-6500 (510) 893-2308 fax

dkaufman@stopwaste.org

www.StopWaste.Org