

JOINT STATE OFFICE

June 18, 2007

Delivered via electronic mail

Dr. Robert Sawyer
Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Landfill Carbon Sequestration in the Greenhouse Gas Emissions Inventory

Dear Mr. Sawyer:

The California Refuse Removal Council (CRRC) is a statewide non-profit trade association comprised of over 120 companies involved in the collection and processing of organic materials that also operate approximately 20 composting facilities, 50 material recovery facilities (MRFs), 25 construction and demolition debris processing facilities, and over 12 landfills statewide. Our industry, in partnership with local government, has been instrumental in our state's efforts to attain the recycling mandate of 50% waste diversion from landfills, required by the California Integrated Waste Management Act of 1989 (AB 939), and will remain critical to the attainment of future sustainable goals.

CRRC members recover traditional organic recyclables such as paper and cardboard at the MRFs, recover wood and cardboard at the construction and demolition debris processing facilities, and compost food waste and green waste at the composting facilities. CRRC fully supports the AB 939 statutory hierarchy of reducing, recycling, composting, transformation, and safe landfilling, in that order. CRRC believes that recycling and composting of organic materials needs to occur first, prior to landfilling. Any financial or policy incentive that the California Air Resource Board could place on the sequestration of organic materials in landfills could turn AB 939 upside down by potential providing an advantage to landfilling over recycling.

CRRC thanks you for the opportunity to discuss the landfill portion of the greenhouse gas emissions inventory with you. We believe that this inventory is a crucial step towards the tracking, and eventual reduction, of greenhouse gases in

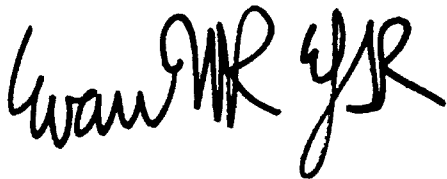
1121 L Street, Suite 505 Sacramento, California 95814-3943 Phone: (916) 444-CRRC (2772) Fax: (916) 442-0623

our state and it is critical that the information in the inventory be accurate. We also believe that the inventory should only be used for accounting purposes and not set or infer future policy.

We have concerns on the use of the undefined term "sequestration," as it applies to the landfilling of lumber and yard trimmings of 6.88 MMTCO₂E, which could grow to 14.8 MMTCO₂E should food, cardboard, and paper be added. We request that you address the technical issues surrounding the term "sequestration", create a definition for sequestration, and consider adopting a new term to describe the temporary storage of the carbon in landfills resulting from the landfilling of wood products, and other organic materials.

Should you have any questions, please contact me at (916) 739-1200.

Sincerely,

A handwritten signature in black ink, appearing to read "Evan W.R. Edgar". The signature is stylized and cursive.

Evan W.R. Edgar, Principal
Edgar & Associates, Inc
For the California Refuse Removal Council

cc: Catherine Witherspoon, Executive Officer, CARB
Chuck Shulock, Program Manager for Greenhouse Gas Reduction, CARB