



07-12-4/  
Sean Edgar

JOINT STATE OFFICE

December 5, 2007

Mary D. Nichols  
Chairman  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

**Re: Agenda Item 07-12-4, Public Meeting on December 6, 2007 to  
Consider Consideration the 1990 Statewide Greenhouse House Gas  
Emissions Level and 2020 Emissions Limit – Support for CARB Staff  
Recommendation on Accounting for Land Use Change & Forestry  
(Biodegradable Carbon Emissions & Sinks)**

Dear Ms. Nichols:

As your Board meeting of December 6 approaches, major landfill company representatives will again be raising the issue that the sequestration of organics in a landfill should be counted in the Inventory as a carbon sink, in which this solid waste management trade association opposes. For this reason, the California Refuse Removal Council (CRRC) is again expressing their strongly held position in support of California's long standing integrated waste management policy that all materials be properly managed in order to maximize the diversion of materials from landfills, and manage all materials to their highest and best use, in accordance with the California Integrated Waste Management Act of 1989 (AB 939) waste management hierarchy. Recently, the California Integrated Waste Management Board (CIWMB) expanded upon AB 939 and has adopted a strategic directive to reduce the amount of organics going into the landfills by 50% by 2020 (adopted February 13, 2007, CIWMB Board meeting).

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 AB 939, and will remain critical to the attainment of future sustainable goals.

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 potentially providing an advantage to landfilling over recycling. The diversion of wood waste to biomass energy facilities, and the application of compost in agriculture and landscaping, are higher and better uses than landfilling.

The purpose of this correspondence is to express the CRRC's support for the California Air Resources Board (CARB) staff regarding their position on the accounting of the carbon in wood and yard waste that is landfilled under Land Use Changes & Forestry (Biodegradable Carbon Emissions & Sinks). Staff has proposed to calculate and track the amount of carbon stored in landfills, but not count it as a sink when calculating the 1990 emissions level. This approach is presented in CARB Staff's report, released November 16, 2007, and is shown schematically in Appendix B, 1990 Carbon Flux Table and Diagram.

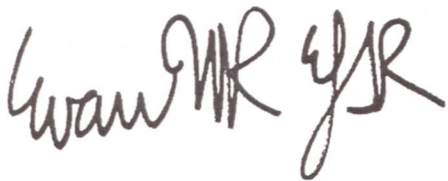
The position of staff was also presented at the Public Workshop to discuss the Draft Updated GHG Emission Inventory held on August 13, 2007, specifically in slides 34 and 37, in which it was stated that the landfilling of wood products would not be considered as carbon "sinks". CRRC testified at the Workshop in support of CARB staff's recommendations, where large landfill companies challenged staff's recommendations. CRRC, as the only statewide trade association testifying on this issue, represents the solid waste and recycling industry, while others spoke for their individual companies' position.

Sequestration is commonly understood to be the uptake and long-term storage of carbon. The sequestration of greenhouse gases as it pertains to lumber and yard wastes occurs during the period of plant growth. The contention has been made that the landfill disposal of wood and compostable organic waste, which reduces its susceptibility to bacterial decomposition, represents a sequestration of carbon. In fact, this approach simply serves to maintain a landfilled carbon pool and to divert those materials from other, more beneficial uses, some of which would provide greenhouse gas (GHG) emissions reductions.

Again, the CRRC supports CARB staff's position on the accounting of the carbon in wood and yard waste that is landfilled, and opposes any financial or policy incentive that the California Air Resource Board could place on the sequestration of organic materials in landfills.

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 with a large "E" and "W", and the initials "R" and "E" are prominent.

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

cc: James Goldstene, Executive Officer, CARB  
Chuck Shulock, Program Manager for Greenhouse Gas Reduction, CARB  
Margo Brown, Chair, California Integrated Waste Management Board  
Mary Leary, Executive Director, California Integrated Waste Management Board