

Evan Edgar  
7-8-2



JOINT STATE OFFICE

July 26, 2007

Ms. Mary D. Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Climate Change: Presentation of Recommendations from Market  
Advisory Committee – Cap and Trade Recycling Offsets**

Dear Ms. Nichols:

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 recyclable materials and also operates 20 composting facilities, 50 material recovery facilities (MRFs), 25 construction and demolition debris processing facilities, and 12 landfills statewide. Our industry, in partnership with local government, has been instrumental in our state's efforts to attain the recycling mandate required by the California Integrated Waste Management Act of 1989 (AB 939), and will remain critical to the attainment of future sustainable goals.

CRRC member companies have recycled millions tons of municipal solid waste and have assisted California in diverting over 50.1 million ton of waste from landfills in 2006 achieving a 54% diversion rate. Waste prevention, recycling, and composting have demonstrated greenhouse gas reduction benefits as illustrated in Federal EPA studies and protocols. Recycling reduces the demand for raw or virgin materials while re-manufacturing with recycled materials generally reduces overall energy use. CRRC urges the Market Advisory Committee to include recommendations for providing offsets for recycling as part of the upcoming Scoping Plan process.

CRRC supports the key recommendations from the Market Advisory Committee Reports to allow offsets. CRRC agrees that the offsets should be real, additional, independent, verifiable, permanent, enforceable, and transparent. Whereas, the California Climate Action Registry (CCAR) and the California Air Resources Board do not currently have established protocols for calculating GHG emissions reductions due to recycling, the current best practice estimation method uses the

Federal EPA's WARM model, which provides emission factors for a broad spectrum of recycled and composted commodities, arrived at through comprehensive life-cycle assessment methodologies. The WARM model estimates overall avoided emissions due to recycling and composting.

CRRC member companies have joined the CCAR to voluntarily determine and report the amount of greenhouse gas reductions that could be attributed to recycling by customizing the WARM model for local use in a standards-based manner. CRRC also looks forward to working with the CCAR, MAC and CARB staff on developing the WARM model for site specific applications that can be independently verifiable and transparent. In consideration in the development of the Scoping Plan, CRRC urges CARB Staff to include recommendations for providing offsets for recycling following the recommendations of the Market Advisory Committee Report.

CRRC thanks the Market Advisory Committee for their leadership. 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 fluid and cursive, with the first name "Evan" being the most prominent.

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