

Comments on the October 1, 2013 Discussion Draft Scoping Plan Update

Subject: Coordination of Waste and Forest Sectors and Refining Net Emissions Reductions

Comments From: Scott Walker, PE
Date: October 31, 2013

Thank you for considering the following comments on the discussion draft document.

1. The prior Forest Sector Greenhouse Gas Inventory (1990-2004) has been removed from the most recent Statewide Inventory (2000-2011) and is indicated as currently under development. The prior Inventory and protocols for the Forest Sector (including technical support document excerpt dated May 2009) included discarded forest wood product biogenic emissions from landfill, composting, and biomass combustion facilities. Wood product emissions in the prior Forest Sector Inventory offset Forest carbon sinks, have potential to be double counted in the Waste Sector, are likely to significantly change with organic waste management diversion measures identified in the Waste Sector Plan and CalRecycle AB 341 Strategies, and will impact the relative AB 32 Target benefits of waste management measures.

The discussion document should acknowledge the need to coordinate the Waste and Forest Sectors and identify the process and timeline, including stakeholder involvement, to ensure a science-based objective analysis of net reduction in emissions, and better understanding of the relative benefits of waste management measures.

2. New direct measurement studies and monitoring results to date from the Landfill Methane Capture Early Action Measure (adopted 2009) are available to improve understanding of the performance of the measure in reducing emissions and federal NSPS/EG requirements.

Will the discussion document and Waste Sector Plan include evaluation, with stakeholder involvement, of the results to date of the Landfill Methane Capture measure and reflect those results in estimates of net reduction in emissions for waste management strategies?

3. The most recent Greenhouse Gas Inventory (2000-2011) includes methane and NO₂ emissions estimates for composting in Biological Treatment of Solid Waste. These estimates will change with waste management strategies, warrant update of emission factors, and addition of anaerobic digestion.

Will the discussion document and Waste Sector Plan include update of these emission factors and reflect those results in estimates of net reduction in emissions for waste management strategies?