



Waste Busters, Inc.

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Esteemed Members of the California Air Resources Board Compliance (CARB)
Offset Protocol Task Force

To whom it may concern,

Despite our best efforts to curb emissions, CO2 levels continue to climb as emissions outpace sequestration of atmospheric carbon, making the case for an **aggressive push to increase sequestration efforts** so we can achieve a lower climate stabilization point and avoid the worst impacts of global climate change.

While there have been many wild ideas about how to go about this, one very sane and practical solution is only now starting to get the attention it deserves as our strongest card to play in the fight against climate change: **Compost**. While composting has many positive climate impacts like avoiding methane emissions from food waste and organics in landfills and reducing methane generated from nitrate based fertilizer production, it also has the benefit **of increasing plant growth and therefore carbon sequestration, particularly when applied to rangelands**. While it seems the Task Force has considered the practice of **Compost application to grazed grassland/rangelands (Chapter 4, Section V, A)** in the Draft Report, I think it deserves more attention and ask for CARB to develop a **simple and straightforward** protocol for California Farmers to earn offset credits for managing the largest carbon sink we have.

I would like to also point out that in the Task Force's analysis of costs/implementation barriers (Ch4, S V, A ii), the board overlooked some important subsidies, like in **SB 1383** that would substantially decrease the cost of implementation to farmers, including **mandatory compost procurement** for CA Cities, most of whom will be looking for a place to put this material to beneficial use.

As a State, we do not have the compost facilities necessary to divert all disposed organics from landfill, but AB 1383 will help address this by mandating diversion while increasing the demand for finished compost products from municipalities through procurement requirements. By producing a protocol for farmers to earn

offsets, California rangeland managers could see a compelling cost proposal to implement carbon farming, taking advantage of more affordable compost and ROIs of under a decade, not including other benefits like: Improved water retention in soils and reduced runoff, a longer grazing season (literally greener pastures). While farmers and our air and soil would benefit, it would also help create a **strong demand for finished compost and new composting facilities** that we desperately need in California to meet our climate and waste reduction goals.

There is a wealth of new information on the topic to consider, including:

The Netflix Documentary: "Kiss the Ground"

The Marin Carbon Project: <https://www.marincarbonproject.org>

The Carbon Cycle Institute: <https://www.carboncycle.org/carbon-farming/>

Sincerely yours,

Michael Siminitus