Waste Busters, Inc.

Michael Siminitus
1301 S. 46th Street B154
Richmond, CA 94804
510 473 2087
michael@wastebusters.info

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

To whom it may concern,

It was discussed at the last Task Force meeting and in the Draft Report that the practice of carbon ranching, or applying compost to rangelands, indeed increases pasture productivity and sequesters carbon. While acknowledged by the Task Force that the carbon sequestration potential of this practice is substantial, it is failing to recommend an offset credit protocol for this important practice.

The sequestration potential of carbon ranching is estimated at between 1-3 tons of carbon per acre per year, for 20 years per application. If only 5% of CA rangeland was treated with a 1/2" compost application (12 tons per acre, 24m-36m total tons of compost), there could be a potential of 2m-6m MTCO2E sequestered each year, for 20 years. That would be a huge help to reaching our climate goals.

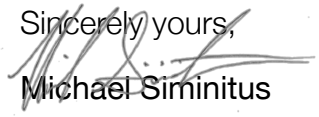
The reason given for not recommending a protocol was the perceived high cost of implementation being prohibitive. I submit to you that most new practices are costly at first then once mature are much more practical. This is one of those cases and we are already seeing a rapidly growing expansion of these practices, including by municipalities like Stop Waste of Alameda County, Ranchers in the CA Healthy Soils Program (HSP) and participants in the Fibershed network that are able to sell their "carbon negative" wool to companies like Patagonia.

Another gargantuan force in driving cost down will be SB 1383 organic waste procurement requirements (Article 12. Procurement of Recovered Organic Waste Products Section 18993.1. Recovered Organic Waste Product Procurement Target), forcing CA cities to purchase products made from their organic wastes, like Compost. Meaning there will likely be between 461,481 tons (25% of target in Compost) and 1,845,925 tons (100% of target in Compost) available each year for this practice, possibly at no cost to the rancher - Especially if there were future carbon credits available in exchange for the compost.

As demand for compost grows, more suppliers and auxiliary businesses will as well, brining down the cost of compost, spreading it or soil monitoring, for example. The greener pastures will likely also spur demand for finished compost for ranch land.

The next generation of ranchers will be carbon ranchers. The practice adds rich layers of improved profitability, supporting the sustainability of ranching, economically and environmentally. However, early adopters need more incentive to support to justify the initial expense problem. By adopting an offset protocol (like that of the HSP), CARB can support ranchers in sequestering carbon long-term rebuilding soils, while also helping support the mandate of SB 1383 and all the Cities and communities (as well as private companies) that want to offset their emissions locally, using their organic waste as a soil amendment, reconnecting cities to the countrysides that support them.

Sincerely yours,



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