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SOLID WASTE ASSOCIATION
of North America

January 13, 2017

Clerk of the Board
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Submitted electronically: <http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: Proposed Short-Lived Climate Pollutants Strategy

Dear Chair Nichols and Board Members:

On behalf of the solid waste industry, the National Waste & Recycling Association (NWRA) and the Solid Waste Association of North America (SWANA) are pleased to provide comments on the *Proposed Short-Lived Climate Pollutant Reduction Strategy* (SLCP Strategy) prepared by the California Air Resources Board (CARB) in November 2016.

NWRA and SWANA represent companies, municipalities and professionals in the solid waste industry. NWRA is a not-for-profit trade association representing private solid waste and recycling collection, processing, and management companies that operate in all fifty states. SWANA is a not-for-profit professional association in the solid waste management field with more than 8,000 members from both the private and public sectors across North America.

General Comments

NWRA and SWANA have previously submitted comments on the April 2016 draft SLCP Strategy. After reviewing updates to the current version, our comments remain substantially the same and are repeated here.

NWRA and SWANA support CARB's goal of reducing methane emissions from the solid waste management sector. Our members have been supporters and implementers of a number of California programs designed to reduce methane emissions, including the early action, landfill methane control

rule, the mandatory recycling of commercial organics and the diversion of green waste from use as alternative daily cover at landfills. Once these programs are fully implemented, **they will divert a very significant portion of organic material that is now disposed at landfills.** However, we are concerned that CARB is neither properly crediting these programs with the methane reductions they will produce, nor realistically assessing the time required to invest in, site and permit new organics management infrastructure.

Support for California Solid Waste Sector Letter

NWRA and SWANA have reviewed and support the comments and recommendations developed by members of the public and private solid waste management sector within the state of California. These important stakeholders are working to support CARB's GHG reduction goals, yet share our concerns about the feasibility of eliminating 75 percent of organics from landfills in the timeframe proposed by the Board. We support and endorse their recommendations by reference.

In particular, we support their recommendation that the principal focus of CARB, CalRecycle and the solid waste management sector should be on successfully implementing the existing programs embodied in AB 1826, AB 341 and AB 1594. We are concerned that CARB is not properly assessing the emission reductions associated with implementing these programs. Even more importantly, CARB's plans do not appear to fully tackle the very real barriers to creating new organics management infrastructure.

AB 1826 will require an investment of at least \$1 billion in new facility financing. While the state is seeking to spend about \$400 million by 2020, the funding is uncertain and the state has not developed a plan to site, permit and build these facilities. The California solid waste management stakeholders outline a number of key questions that CARB and CalRecycle should address to develop environmentally protective infrastructure to manage diverted organics.

Both NWRA and SWANA are concerned that CARB has neither assessed nor factored in the methane emission reductions associated with the Landfill Methane Control Measure. Our members are implementing the rule with significant effort and expense. Approximately 95 percent of California landfills have installed active gas collection and control systems to comply with the rule, yet CARB's draft strategy provides no assessment of the methane reduction benefits of the program. We urge CARB to both assess the reductions already achieved by the landfill control measure and address the need for organics management infrastructure before embarking on even more ambitious food waste diversion programs.

The industry letter also discusses inconsistencies between the SLCP Strategy and the existing Landfill Methane Rule. We suggest that CARB ensure that the SLCP Strategy takes into account consideration from other CARB rulemaking to avoid double counting emissions reductions. Failure to do so will result in unrealistically high predictions for emissions reductions.

Conclusion

It appears that the SLCP Strategy 1) overestimates current landfill emissions, 2) underestimates landfill emissions reductions occurring from implementation of the Landfill Methane Control Measure, and as a result, 3) overestimates potential methane reductions associated with the draft strategy. In order to achieve valid estimates for emissions reductions, NWRA and SWANA suggest that CARB review their

emissions estimates in accordance with better models such as CALMIM and avoid double counting emissions reductions.

The NWRA and SWANA appreciate your consideration of our comments. Should you have any questions about these comments, please call Anne Germain, Director of Waste & Recycling Technology for NWRA, at 202-364-3724 or e-mail her at agermain@wasterecycling.org. You may also call Jesse Maxwell, Advocacy & eLearning Program Manager for SWANA, at 240-494-2237 or e-mail him at jmaxwell@swana.org.

Very truly yours,



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