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NORCAL WASTE SYSTEMS, INC.

February 27, 2008

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

RE: Support for ETAAC recommendations on waste reduction, recycling and resource management

Dear Ms. Nichols,

We submit these comments to you in regards to the Economic and Technology Advancement Committee (ETAAC) report that you are considering at your February 28th Board Meeting. We would like to express our strong support for the following measures that were incorporated into the "Waste Reduction, Recycling and Resource Management" section of the ETAAC report:

- IV. – J. Develop Suite of Emission Reduction Protocols for Recycling (pg. 4-14)
- IV. – K. Increase Commercial-Sector Recycling (pg. 4-15)
- IV. – L. Remove Barriers to Composting (pg. 4-17)
- IV. – M. Phase Out Diversion Credit for Greenwaste Alternative Daily Credit (pg. 4-18)
- IV. – N. Reduce Agricultural Emissions Through Composting (pg. 4-19)

If implemented the above measures would help to unlock the full greenhouse gas reduction potential of waste reduction, recycling and composting. These are proven technologies that can reduce significant emissions in multiple areas including those associated with upstream energy use and methane released at the landfill, as well as greenhouse gases associated with transportation related to agriculture and soil sequestration in the case of composting efforts tied to local agriculture. We encourage you to incorporate these measures into the AB32 scoping plan and to work with local jurisdictions to develop credible protocols for accounting for these reductions.

We are concerned, however, that in section IV. O "Evaluate and Improve Policies for Qualified Waste Conversion Technologies" the projected GHG reductions are overly optimistic as they are unproven, disputed and will vary widely based on feedstock input and technology. We would like to see any funding support for R&D to prioritize those technologies that better complement composting and recycling and show higher life cycle net energy promise, such as with anaerobic digestion technologies.

Thank you for your consideration of these important points and we look forward to working with you in the effort to address climate change.

Sincerely,

Jared Blumenfeld, Director
Department of the Environment
City and County of San Francisco

Sincerely,

Rachel Oster
Legislative and Regulatory Specialist
Norcal Waste Systems, Inc.