



CO 14135

Environmental Services Department
INTEGRATED WASTE MANAGEMENT DIVISION

November 19, 2008

Ms. Mary Nichols, Chair
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

ORIGINAL:
Copies:
Board Clerk
Executive Officer
Chair

Dear Chairperson Nichols:

RE: Recycling and Waste Enhancements for the California Air Resources Board's Proposed Scoping Plan

The City of San Jose appreciates the opportunity to comment on the Proposed Scoping Plan (Plan) and acknowledges that there have been significant improvements in the content and recommended measures included in the *Recycling and Waste* section of the Plan. However, the City suggests that the following three items be included:

- **List "Commercial and Residential Food Scrap Diversion" as a component of measure no. RW-3.** In the Plan, the California Air Resources Board (CARB) acknowledges the importance of diverting food scraps from the landfill. However, this item is not carried over into the recommended measures listed. Compostable organics make up 30 percent of California's overall waste stream per the CARB Economic and Technology Advancement Advisory Committee (ETAAC) report (<http://www.arb.ca.gov/cc/etaac/ETAACFinalReport2-11-08.pdf>). By diverting food scraps from the landfill, the State would reduce methane generation at landfills and increase a valuable input to compost – thereby supporting the existing recommended measure that calls for the increased production of compost.
- **In the introductory paragraph, identify reduced methane emissions as an additional benefit of composting organics over landfilling.** Currently the introductory paragraph states that "...by recovering organic materials...there is an opportunity to further reduce greenhouse gas emissions *through the indirect benefits associated with the reduced need for water and fertilizer...*" [emphasis added]. This fails to account for an additional benefit of reduced methane emissions related to the diversion of organic material, which is discussed in the proceeding ("Reduction in Landfill Methane") section as well as the ETAAC report.

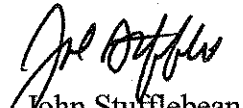


- **Count the greenhouse gas emission reductions association with measure no. RW-3 toward the AB 32 goal.** Footnote number 43 on page 63 of the Plan states "Reductions from RW-2 and RW-3 are not counted toward the AB 32 goal." CARB should continue to work with the California Integrated Waste Management Board, as it indicates in the footnote, to more accurately quantify the emission reduction associated with specific actions that would fall under measure no. RW-3. However, given that zero waste/high recycling was already established as a "high-confidence" strategy with GHG reduction potential of 10 million tons CO₂ equivalent by 2020 in the Climate Action Team's *Strategies Underway in California That Reduce Greenhouse Gas Emissions*, CARB can utilize available estimates and information to offer even a conservative estimate of greenhouse gas emission reductions associated with this measure rather than choosing to not count them.

By including the items mentioned above in the Plan, CARB will further the statewide effort to reduce greenhouse gases.

Thank you for your consideration.

Sincerely,


John Stufflebean
Director