



SWANA[®]

SOLID WASTE ASSOCIATION
of North America

CALIFORNIA CHAPTERS

FOUNDING

SIERRA

GOLDRUSH

LEGISLATIVE TASK FORCE

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July 30, 2008

Ms. Mary Nichols, Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812-2815

Dear Chairperson Nichols:

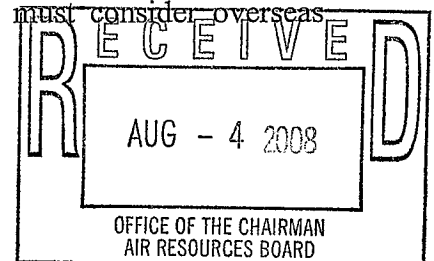
**COMMENTS REGARDING THE CLIMATE CHANGE DRAFT
SCOPING PLAN: RECOMMENDED MEASURE #15 – “INCREASE
WASTE DIVERSION, COMPOSTING, AND COMMERCIAL
RECYCLING AND MOVE TOWARD ZERO-WASTE”**

On behalf of the Solid Waste Association of North America (SWANA) Legislative Task Force, I want to thank the California Air Resources Board (CARB) for the opportunity to comment on the *Climate Change Draft Scoping Plan* (Scoping Plan), which was released for public comment on June 26, 2008. As the lead agency for implementation of AB 32 (The Global Warming Solutions Act of 2006), CARB is responsible for developing a comprehensive set of actions designed to reduce overall greenhouse gas (GHG) emissions in California while preserving our environment, revitalizing and expanding our economy, and improving public health and wellness. We applaud CARB's staff for their tireless efforts, and recognize the development of this Scoping Plan as a tremendous undertaking, which has significant ramifications for our future health and well-being. However, we do have some concerns which we have listed below.

We respectfully request your consideration of the following comments in order to provide additional context and details to the Draft Scoping Plan's recommendations regarding ***Recommended Measure No.15 - Recycling and Waste:***

- SWANA strongly supports recycling as an important element of our integrated solid waste management system, and recognizes its value in reducing our dependence on current disposal options. However, without a complete economic and environmental life-cycle analysis ever being conducted by the State, it is not possible to measure the net impact in GHG emissions that result from recycling activities. As such, SWANA strongly recommends that CARB, in concert with the California Integrated Waste Management Board (CIWMB), conduct a complete life-cycle analysis in order to quantify GHG reduction potential for all recycling activities.

- The California recycling industry is very complex and extends well beyond California and U.S. boundaries. The Scoping Plan must consider overseas



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environmental laws and regulations, which when compared to California regulations, may be considered weak or non-existent. It should also be recognized that there are no jurisdictional boundaries that would limit the movement of air contaminants (including GHG emissions) from other countries to California, which can negatively impact our air quality and our residents' well being. Thus, in addition to conducting a complete life-cycle analysis for recycling activities, SWANA believes it is critical for the State to take the lead in developing local markets for recyclables.

- Currently, the CIWMB is conducting a life-cycle analysis to evaluate the economic and environmental affects of composting in comparison to other solid waste management options. While SWANA is not opposed to the expansion of composting activities as recommended by the draft measure, we suggest that implementation be delayed pending the completion of the CIWMB's study. Additionally, it should be noted that the development of composting facilities in metropolitan/urbanized areas is unlikely to be a valid solid waste management option unless composting activities are conducted in enclosed facilities that operate under negative pressure to control odors and ensure proper air quality in protecting the health and safety of neighboring residents. This fact needs to be considered prior to the finalization of Recommended Measure No.15.

- Extending producer responsibility is essential to reducing manufacturing waste, energy consumption, and GHG emissions. SWANA supports including an analysis of potential GHG emission reductions associated with extended producer responsibility in the Scoping Plan. Such an analysis would help inform decision makers contemplating implementation of extended producer responsibility programs, which have the potential to impact all aspects of our integrated solid waste management system.

- SWANA has been a strong supporter of conversion technologies and has played a major role in promoting their development. Pursuant to Assembly Bill 2770 (2002), CIWMB in concert with the Universities of California at Davis and Riverside conducted a three-year, \$1.5 million study to verify the viability of these technologies as an element of our integrated solid waste management system. The findings of this report substantiated not only the viability of conversion technologies as an alternative to landfilling, but their ability to produce clean renewable energy that can significantly reduce GHG emissions and our dependence on fossil fuels. In February 2008, CARB's Economic and Technology Advancement Advisory Committee (ETAAC) released its report entitled "*Technologies and Policies to Consider for Reducing Greenhouse Gas Emissions in California*". Chapters four, five, six, and Appendix IV highlighted existing barriers that have significantly hindered development of conversion technologies in California. ETAAC's report recognized that these barriers include, but are not limited to legislative and regulatory barriers, which must be addressed. The Report further noted that by conservative estimates, conversion technologies have the potential to reduce GHG emissions by approximately five million metric tons of CO₂ equivalent (MMTCO₂E) every year. SWANA estimates the potential GHG reduction of conversion technologies could possibly be three times greater, since conversion technologies have a simultaneous triple benefit to the environment: (1) reduction of transportation emissions resulting from long-distance shipping of waste; (2) elimination of methane production from landfilling waste; and (3) displacement of the

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use of fossil fuels by net energy (fuel and electricity) produced by conversion technologies. These findings need to be recognized and conversion technologies should be incorporated into Recommended Measure No.15.

We appreciate your consideration of our position and we look forward to working with you.

Sincerely,



Paul Yoder
Legislative Advocate

Cc: Mr. Dan Dunmoyer, Cabinet Secretary, Office of the Governor
Members, California Air Resources Board
Ms. Margo Reid Brown, Chair, California Integrated Waste Management Board
Mr. Mark Leary, Executive Director, California Integrated Waste Management Board
Members, SWANA Legislative Task Force

