CO 7-114

July 18, 2008

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

RE: California Air Resources Board's DRAFT Scoping Plan as it pertains to the recycling and waste management sector.

I am writing to encourage the CARB to add Zero Waste practices to its draft Scoping Plan. I also request that CARB coordinate closely with the CIWMB to produce a scoping plan which adequately takes advantage of the GHG reduction potential of Zero Waste practices. I have been an environmental professional for over 20 years, and I believe that only by combining the expertise of the CARB and the CIWMB can California's green house gas reduction goals be achieved.

Excellent examples of Zero Waste practices can be found in the Zero Waste recommendations from Section 4. IV. (Waste Reduction, Recycling and Resource Management) of the CARB Economic and Technology Advancement Advisory Committee (ETAAC) report (http://www.arb.ca.gov/cc/etaac/ETAACFinalReport2-11-08.pdf):

J. Develop Suite of Emission Reduction Protocols for Recycling
K. Increase Commercial-Sector Recycling
L. Remove Barriers to Composting
M. Phase Out Diversion Credit for Greenwaste Alternative Daily Cover Credit
N. Reduce Agricultural Emissions through Composting

The only draft Scoping Plan preliminary recommendation related to Recycling and Waste is "*RW-1 Landfill Methane Control*" which is presented in Table 19 on pg. 35 of the draft Plan (http://www.arb.ca.gov/cc/scopingplan/document/draftscopingplan.pdf). **Adding a methane recovery system to a landfill is a lot like adding filters to cigarettes:** It helps mitigate the impacts, but it does not solve the problem. To most effectively prevent cancer: stop smoking. To most effectively prevent GHG emissions from landfills: stop landfilling organic materials. Due to the open nature of landfills, no gas recovery system is 100% effective. A full or partial landfill ban on

IF California's commonly recyclable and compostable materials that are currently disposed as mixed waste were *INSTEAD* recycled and composted, *THEN* the GHG emission reduction would be over 25 million tons CO2 equivalence. This has been determined using US EPA's Waste Reduction Model (WARM) model and waste characterization data published by the California Integrated Waste Management Board (CIWMB), and has been verified by US EPA Region 9 staff.

The prioritized ordering of the waste reduction hierarchy to optimize resource conservation by reusing materials and repairing, refurbishing, and rehabilitating existing products and buildings to retain their form and function (and thus embodied energy) holds the potential for:

- substantially greater GHG reductions than recycling and composting alone; and
- creating 'green collar' jobs producing value-added contributions to the state's economy.

While a small amount of energy can be extracted from landfill gas, a larger amount of energy can be conserved by recycling waste materials. In general, producing products from recycled materials consumes much less energy than producing them from virgin materials.

Zero Waste (i.e., reduce-reuse-recycle-compost) is a significant climate protection strategy which offers tens of millions of tons of CO2 equivalence GHG emissions reductions annually for California at low cost (compared to other options) using existing, proven, environmentally sound methods.

CIWMB's Strategic Directives were adopted as "the most effective and efficient means to create a zero waste California." The Directives (http://www.ciwmb.ca.gov/BoardInfo/StrategicPlan/) include specific steps to minimize waste (SD 3), move toward producer responsibility (SD 5) and support market development (SD 6). Inexplicably, none of CIWMB's Strategic Directives are part of the draft Scoping Plan.

Thus, it is difficult to understand why CARB failed to include in the draft Scoping Plan any of the ETAAC report's Waste Reduction, Recycling and Resource Management recommendations. It is particularly difficult to understand this given that the governor's Climate Action Team has already identified Zero Waste/High Recycling Programs as a "high-confidence" strategy with significant GHG reduction potential of 10 million tons CO2 equivalent by 2020 (see: http://climatechange.ca.gov/publications/factsheets/2005-06_GHG_STRATEGIES_FS.PDF).

California is off to a good start toward climate protection via Zero Waste, thanks to the California Integrated Waste Management Act of 1990 (AB 939) which mandated 50% waste diversion by 2000. **It is critical that the Scoping Plan recognize and include Zero Waste California (i.e., reduce-reuse-recycle-compost) as the significant climate protection strategy that it is.**

Thank you for your consideration of these suggestions.

Sincerely,

David Krueger

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