



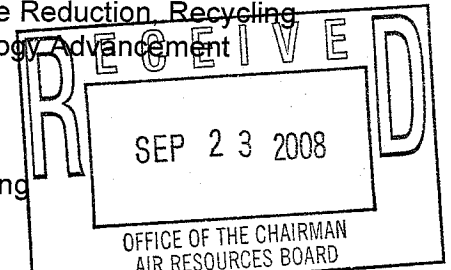
Mary Nichols, Chair
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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

Ecology Action of Santa Cruz is a nonprofit environmental consultancy that delivers effective resource conservation education services, technical assistance and program implementation. Since Earth Day 1970 EA and agency partners have created cutting-edge conservation programs, proven their effectiveness, and established each program as a sustainable community resource.

Ecology Action is **disappointed** that missing from CARB's draft Scoping Plan (<http://www.arb.ca.gov/cc/scopingplan/document/draftscopingplan.pdf>) are any of the following 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



In fact, 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>). This lone recommendation represents a narrow-minded strategy to mitigate the worst climate impacts of wasting AFTER failing to reduce, reuse, recycle, and compost.

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.

This above bullet-points are explained and documented further in the recently-released report Stop Trashing the Climate: <http://www.stoptrashingthecclimate.org>

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.

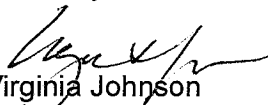
Thus, it is difficult to understand why CARB failed to include in the draft Scoping Plan any of the ETAAC report's Waste Reduction, Recycling and Resource Management recommendations. It is particularly difficult to understand this given that the governor's Climate Action Team has already identified Zero 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). Ecology Action believes this 10 million tons CO2 equivalent by 2020 represents a conservative estimate of the emission reduction potential of Zero Waste in California.

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.**

Finally, Ecology Action has launched the **CLIMATE SOLUTIONS PROGRAM**, a bold leadership initiative to mobilize the entire Monterey Bay Area to radically reduce our carbon footprint. Waste reduction and recycling will play a vital role in achieving the goals of the program to reduce greenhouse gas emissions.

Thank you for your consideration.

Sincerely,


Virginia Johnson
Executive Director