



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 pleased by the adoption of California's AB 32 climate protection legislation. However, our review of the draft Scoping Plan reveals that the current document **falls short** in the crucial area of Zero Waste. <http://www.arb.ca.gov/cc/scopingplan/document/draftscopingplan.pdf>

In addition to our many conservation programs, Ecology Action has recently 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.

In order to achieve these vital protections, **Ecology Action strongly urges the California Air Resources Board to incorporate the following integral 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

Our review indicates that the only preliminary recommendation related to Recycling and Waste in the current draft Scoping Plan 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>

Although our organization recognizes the importance of *Landfill Methane Control*, this lone recommendation represents an **inadequate and shortsighted strategy** to mitigate the worst climate impacts of wasting AFTER failing to reduce, reuse, recycle, and compost. By choosing instead to incorporate a comprehensive Zero Waste strategy (reduce-reuse-recycle-compost) before waste is generated, we believe a greater overall impact can be achieved.

Zero waste effectively preempts substantial greenhouse gas (GHG) emissions before they are emitted, rather than controlling them after they are generated. These avoided emissions through Zero Waste represent a significant source of immediate, permanent and systemic GHG reductions and a **far superior economic and environmental approach to accomplishing AB 32 goals.**

Our organization is concerned that CARB has not chosen to include any of the ETAAC report's Waste Reduction, Recycling & Resource Management recommendations in the draft Scoping Plan.

Using the US Environmental Protection Agency (EPA) Waste Reduction Model (WARM) and waste characterization data published by the California Integrated Waste Management Board (CIWMB), and verified by US EPA Region 9 staff, *IF* California's commonly recyclable and compostable materials that are currently disposed as mixed waste, were *INSTEAD* recycled or composted, *THEN* the resulting **GHG emission reduction would be over 25 million tons CO₂e.**

The prioritized ordering of the zero waste reduction hierarchy (to reduce, then reuse, then recycle or compost) further optimizes resource conservation by reusing materials and repairing, refurbishing, and rehabilitating existing products and buildings to retain their form and function (and thus embodied energy), representing additional potential for:

- substantially greater GHG reductions achieved through reduction and reuse than recycling and composting alone; and
- considerable GHG reductions through recycling or composting of items at the end of their life rather than trashing waste; and
- the creation of 'green collar' jobs producing value-added contributions to the state's economy.

CIWMB's Strategic Directives were adopted as "*the most effective and efficient means to create a zero waste California,*" all of these directives are noticeably absent from the draft Scoping Plan. These Directives <http://www.ciwmb.ca.gov/BoardInfo/StrategicPlan/> include specific steps to minimize waste (SD3), move toward producer responsibility (SD5) and support market development (SD6).

Moreover, 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 CO₂e by 2020 (see: http://climatechange.ca.gov/publications/factsheets/2005-06_GHG_STRATEGIES_FS.PDF).

Zero Waste is thus a significant climate protection strategy which **offers tens of millions of tons of CO₂e GHG emissions reductions annually for California at low cost** (compared to other options) using existing, proven, environmentally sound methods. These important findings are documented further in the recently-released report Stop Trashing the Climate: <http://www.stoptrashingtheclimate.org>

Based on these data, Ecology Action believes that 10 million tons CO₂e 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.**

Thank you for your consideration.

Sincerely,



Virginia Johnson
Executive Director