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Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Sept, 20, 2008

**RE: Lack of Strong Recycling Actions in Draft AB 32 Scoping Plan**

Dear Chair Nichols,

We are concerned about the lack of strong waste reduction, recycling, and composting recommendations in the draft plan, and we urge you to reconsider including the following recommendations in the final Scoping Plan.

**Commercial Recycling**

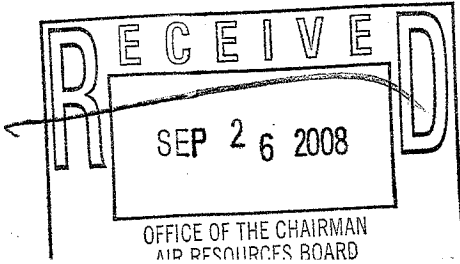
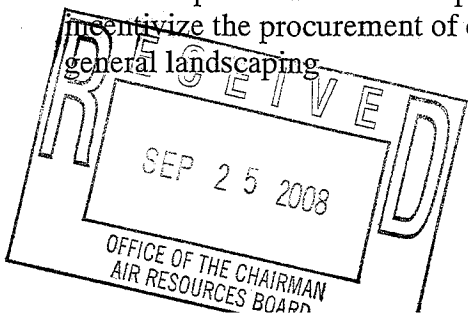
We believe that specific actions to increase commercial recycling need to be added to the recommendation. Specifically, the addition of the following recommendations (largely taken from the ETAAC report) would achieve significant greenhouse gas reductions from the commercial sector:

- Require any business that generates 4 or more cubic yards of waste per week to implement a recycling program that is appropriate for that type of business.
- Owners of multifamily dwellings should be required to arrange for recycling services that are appropriate for the multifamily dwelling.
- Set material-specific disposal limits for businesses that would restrict the disposal of recyclable materials -- such as cardboard, paper, or construction and demolition waste -- regardless of whether it is collected by a refuse company or hauled to the landfill by the business itself.

**Composting**

Organic materials also offer an incredible opportunity for greenhouse gas reductions, particularly through increased composting. The legislation could be strengthened with the following discrete actions:

- Increase the use of compost within California's agricultural sector by providing financial incentives / GHG offsets for replacing fertilizers/pesticides with compost (e.g. some regions in Italy pay farmers to apply compost); also, develop California-specific crop specifications for compost
- Encourage the collection of food scraps with green materials (similar to the programs in San Francisco and Alameda County)
- Disincentivize the landfilling of yard trimmings by seeking legislative authority to remove diversion credit for green materials used as Alternative Daily Cover
- If cost-prohibitive mitigation measures for greenwaste composting become required by regional air pollution control districts or regional water districts, the State should offer financial incentives to help offset these costs to compost operations
- Boost the procurement of compost for use by Cal Trans and other State agencies; also incentivize the procurement of compost by municipalities for use in parks, schools, and general landscaping



### **Quantification of Emissions Reductions**

The ARB should determine which of the the following would provide a good starting point:

- GHG savings through the use of secondary materials in the manufacturing process (i.e. glass manufacturing).
- Avoided methane emissions from not landfilling organic materials
- Avoided N2O emissions from reducing application of fertilizers/pesticides
- Reduced electrical demand from decreased agricultural irrigation

In addition to these protocols, the GHG implications of various waste management options need to be provided to local governments and corporate decision makers. This GHG assessment tool can be based on existing EPA models and does not have to meet the rigorous standards of a tradable offset. This methodology could then be integrated into local government protocols, business protocols, CEQA guidance documents, and other tools that seek to quantify the greenhouse gas impact of an entity.

In summary, we believe it is imperative for the ARB to take strong actions in the Scoping Plan to reduce greenhouse gas emissions through waste reduction, recycling, and composting. These policies have a very successful track record, provide enormous co-benefits, and are very cost-effective.

Sincerely,



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