



Paul Gilman, PhD
Senior Vice President and Chief Sustainability Officer

Covanta
445 South Street
Morristown, NJ 07960
Tel: 862.345.5204
pgilman@covanta.com

February 14, 2014

Brian Larimore
Department of Resources Recycling and Recovery (CalRecycle)
1001 I Street--P.O. Box 4025
Sacramento, CA 95812-4025

Re: Organics Grant Program, Fiscal Year 2014/15

Dear Mr. Larimore:

Thank you for the opportunity to comment on CalRecycle's fiscal year 2014/15 organics grant program. We believe the program will create real opportunities to expand the organic waste processing capacity in California, reaping significant reductions in the state's greenhouse gas emissions by keeping organic materials out of landfills and, in the case of anaerobic digestion, generating low carbon energy in the form of electricity and/or renewable natural gas (RNG).

To best align the scoring criteria with the potential GHG benefits of organics diversion from landfills, the GHG emissions reductions scoring criteria should include the quantification of avoided landfill methane. Including avoided landfill methane will prioritize the diversion of the organic waste streams that result in the greatest GHG benefits (e.g. food wastes) and better quantify the full benefits of the program.

Precedent already exists in other regulatory programs for the consideration of avoided landfill methane. The June 2012 Proposed LCFS Pathway for the Production of Biomethane from High Solids Anaerobic Digestion (HSAD) of Organic (Food and Green) Wastes arrives at a negative carbon intensity as a direct result of avoided landfill methane.

The quantification of avoided landfill methane is critical given methane's potency and significance in driving climate change. According to the 5th Assessment Report, methane now represents over 40% of the total net drivers of climate change.¹ The latest data on methane's contribution to radiative forcing, a measure of the uptake of energy, and hence global warming of the earth's climate system,

is over 75% higher than previously reported. The report updated the 100 year global warming potential to 34 CO₂ when climate-carbon feedbacks are included and 84 times more potent over 20 years.² This is a 36% increase over the last report, and a 62% increase over the methane GPW value of 21 that is still widely used. Landfills only collect 57% to 70% of the methane generated by the decomposition of organic wastes over their lifetime, even with the landfill early action measures in place.³

The proposed Organics Grant Program will help spur the development of organics management capacity in California, and we fully support the program, as well as other targeted efforts aimed at diverting wastes from landfills and increasing the market demand for organics management facilities. Quantifying the full GHG benefits of organics diversion, inclusive of avoided landfill methane, will ensure that the grant program maximizes its potential to reduce California's GHG emissions. We look forward to working together with CalRecycle to sustainably increase organics diversion in the state.

Best regards,



Paul Gilman
Senior V.P. and Chief Sustainability Officer

¹ See Figure SPM.5 of IPCC WGI. 2013. *Working Group I Contribution to the IPCC Fifth Assessment Report Climate Change 2013: The Physical Science Basis Summary for Policymakers*.

² See Table 8-7 of *IPCC WGI Fifth Assessment Report, Chapter 8: Anthropogenic and Natural Radiative Forcing*.

³ CalRecycle (2012) *CalRecycle Review of Waste-to-Energy and Avoided Landfill Methane Emissions*