

**BELOW IS THE COMMENT YOU SELECTED TO DISPLAY.  
COMMENT 26 FOR PROVIDES THE PUBLIC AND STAKEHOLDERS OPPORTUNITIES TO PROVIDE  
"INFORMAL" PUBLIC COMMENTS AS PART OF ARB'S 2013 SCOPING PLAN UPDATE  
WORKSHOP SERIES (2013-SP-UPDATE-WS) - 1ST WORKSHOP.**

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Subject: Comments on Waste Management Sector of the AB 32 Scoping Plan Update

Comment:

The City and County of San Francisco Department of the Environment submits the following comments on the Waste Management Sector of the AB 32 Scoping Plan Update. We appreciate many valuable recommended actions proposed in the Sector Plan. Overall we strongly encourage not to incentivize landfilling, incineration, or "thermal/conversion" technologies and prioritizing incentives for anaerobic digestion and composting as well as reuse, recycling, and remanufacturing. More specifically, we strongly encourages that the AB 32 Scoping Plan:

- Prioritize mandating source separated collection of food scraps, starting at least with commercial food scraps, to maximize carbon emission reductions through edible food reuse, animal feed, and anaerobic digestion and/or composting; and prioritize a ban on landfilling organic materials. Start phasing in the landfill ban with landscape plant debris as 23 other states have already done, then commercial food organics as states such as Massachusetts are doing in 2014, and then residential food organics. San Francisco has mandated the source separation for composting collection of all organic materials since 2009, with all sectors participating. Landfill bans or other mandates for composting collection have proven to be the most effective policies in diverting organics from landfills. Therefore, CalRecycle and CARB need to prioritize the adoption of these regulations in order to achieve the 2020 goals of AB 32 and AB 341.

- Prioritize incentives for diversion of organic and recyclable materials from disposal (landfills and incinerators) into reuse, recycling, anaerobic digestion (AD) and/or composting as they are proven technologies that provide significant carbon emission reduction benefits compared to landfilling or incineration. San Francisco has found that 90% of the entire discard material stream ("waste") can be reused, recycled or AD/composted and CalRecycle studies have found 2/3rds of disposed material is recyclable or compostable. Yet millions of tons of recyclable or compostable materials are still disposed. The biggest obstacle to increased diversion and resulting reduction in carbon emissions is the direct economic competition from landfilling. Emission reduction benefits shown from compost use reducing fossil fuel derived fertilizers, pesticides, irrigation and carbon sequestration, should be accounted for as well as used anaerobic digestion gas to offset fuel emissions. In addition to mandated collection and disposal bans, increased financial incentivizes are needed to support and develop the collection, processing and marketing infrastructure for

beneficial diversion to effectively compete against disposal, including local reuse and remanufacturing such as wood remanufacturing a higher and better use than biomass burning.

- Do not incentivize landfill gas used for energy as that will effectively subsidize the landfilling of organic materials and can run counter to efforts to divert organic materials from landfill into more carbon beneficial anaerobic digestion and/or composting. Landfills should be required to convert their captured gas into energy but not subsidized and given further competitive cost advantage over diversion from landfill. Increased landfilling of organics will increase emissions of greenhouse gases even with landfill gas capture systems and thereby increase global warming pollution, undermining the intent of AB 32.

- Do not incentivize incineration (including "thermal or conversion" technologies) of organic materials as that effectively subsidizes the burning of organic materials and can run counter to efforts to divert organic materials to more proven carbon beneficial anaerobic digestion and/or composting. Incineration results in increased carbon emissions compared to anaerobic digestion and composting that sequester carbon with the land application of compost or digestate. Burning materials made from non-renewable resources should not be considered renewable energy.

- Do not exempt incineration or landfill gas from the cap-and-trade program. Exempting incineration (thermal or conversion) or landfills from cap-and-trade would give these facilities a competitive advantage over higher value diversion programs and facilities resulting in increased net carbon emissions.

Thank you for the opportunity to comment.

**Attachment:**

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