

From: Paul Stewart [mailto:paul@samcar.org]
Sent: Wednesday, August 14, 2013 3:11 PM
To: Climate Change CalRecycle
Subject: Comments RE: Waste Sector Management Plan

Thank you for the opportunity to comment on the Waste Sector Management Plan (the Plan). In reviewing the comments already filed regarding the Plan, the San Mateo County Association of REALTORS® (SAMCAR) would add the following:

>The implementation plan calls for the diversion of 10 million tons of digestible/compostable materials from landfills by 2020 with the objective to help reduce GHG. While this is a laudable goal, it is impractical to expect a diversion of that magnitude to be redirected from our landfills by 2020. Alternate, more prudent goals and plans to achieve same must be substituted or this portion of the Plan will not achieve fruition.

(For example, one of the commenting agencies suggested applying one-half inch of compost to grazed rangelands as a means to generate GHG emission reductions. This is unrealistic and could have the unintended consequence of rendering grazing lands fallow. This would, in turn, have a demonstrative economic effect on the beef and lamb industry. The proposal should not be considered.)

>The Plan calls for developing additional compliance offset protocols to help meet the goals of AB 32. If CalRecycle wishes to enact a program that works and whose procedures will actually be utilized, these compliance protocols must be voluntary.

>Lastly, the Plan correctly notes there are significant hurdles to the development of new facilities. With the myriad regulatory compliance requirements, permits, the length of time for approval processes, and local and regional planning prejudices, we recommend CalRecycle approach, post haste, Senate President Pro Tem Darrell Steinberg to have his bill to reform the California Environmental Quality Act, (SB 731) amended to exempt such projects. (The bill is awaiting action in the Assembly, which may render the timing moot.)

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"Just because you do not take an interest in politics doesn't mean politics will not take an interest in you." Pericles, Athenian Statesman

