



Caroll Mortensen
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Submitted via e-mail to: climatechange@calrecycle.ca.gov

RE: Comments on the Waste Management Sector Plan

Dear Ms. Mortensen:

Thank you for the opportunity to comment on the Waste Sector Management Plan (the Plan). Environmental Defense Fund (EDF) applauds the California Department of Resources, Recycling, and Recovery (CalRecycle) and the Air Resources Board (ARB) for the development of this comprehensive plan which will help the state meet two of its goals – 75% recycling and reducing the state’s greenhouse gas (GHG) emissions to 1990 levels – by 2020. EDF supports these goals and, in particular, the market-based solutions proposed, including the creation of offsets generated by the composting of waste.

EDF is a leading international nonprofit organization representing more than 700,000 members. Since 1967, we have linked science, economics and law to create innovative, equitable and cost-effective solutions to society's most urgent environmental problems. Guided by science, we design and transform markets to bring lasting solutions to the most serious environmental problems. EDF supports the state’s 75% recycling goal and the draft Plan to meet it. The implementation plan for this includes the diversion of 10 million tons of compostable/ digestible materials from landfills in 2020 which will generate valuable GHG reductions, helping the state meet its GHG reduction goal. EDF acknowledges and agrees with the short-term challenges laid out in the Plan. Furthermore, EDF supports the proposed solutions outlined in the Plan. Our comments are focused on three key areas of the Plan – Markets, Offsets and Facilities.

Develop markets for compost

EDF acknowledges that markets are required to absorb the additional 3.75 million tons of composted which will be generated in 2020. One market of particular interest is the application of compost to rangeland. Applying one-half inch of compost to grazed rangelands can generate GHG emission reductions of 1.3 to 3.2 Mg CO₂e per hectare per year.¹ With approximately 23 million hectares of rangeland in California, there is an enormous potential market to purchase the increase in compost generated.

¹ Silver, W.L.; DeLonge, M.S.; Owen, J.J., “Climate Change Mitigation Potential of California’s Rangeland Ecosystems, A draft report to the California Air Resources Board,” April 30, 2013.

Develop offsets for compostable materials

To ensure the success of AB32, EDF supports the development of additional compliance offset protocols. Over the past two years, EDF has managed a Natural Resource Conservation Service Conservation Innovation Grant entitled “Development of Protocols and Accounting Methods for Carbon Sequestration on U.S. Rangelands.” One of the deliverables of this grant is rangeland offset protocols. In the upcoming months, EDF and its partners will submit an offset protocol to the American Carbon Registry for its review and approval. This is well suited to serve as the foundation for an AB32 compliance offset protocol.

Permitting of New Composting and Anaerobic Facilities

EDF agrees that some of the key barriers to the development of new facilities are the “multiple permits and regulatory compliance requirements, the length of time for approval processes, CEQA issues, and local community and regional planning and acceptance” of facilities. We recommend that a working group be developed to work with the state agencies involved in permitting new facilities (including CalRecycle, ARB, California Department of Food Agriculture, and the Natural Resources Agency). While EDF supports streamlining the permitting process, this must be done in a manner that does not compromised environmental quality of public health.

EDF believes that the thoughtful adoption of the Plan is a strong step forward in meeting two of the state’s most important 2020 environmental goals – 75% recycling and reducing the state’s greenhouse gas (GHG) emissions to 1990 levels.

Sincerely,



Robert Parkhurst
Director, Agriculture Greenhouse Gas Markets
Environmental Defense Fund

Cc:

Scott Smithline, Assistant Director, CalRecycle
Teri Wion, Senior Integrated Waste Management Specialist, CalRecycle
Steve Cliff, Chief of the GHG Market Development and Oversight Branch, ARB
Greg Mayeur, Manager, ARB