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Sent: Friday, July 05, 2013 6:14 PM
To: Climate Change CalRecycle
Cc: Deidra Dingman; Demian Hardman
Subject: Comments on the Draft Waste Sector Implementation Plan

These comments respond to the Air Resources Board (ARB) announcement to seek public input on a draft Waste Sector Management Plan that discusses activities to achieve the 75% recycling goal of AB 341 and inform the development of the AB 32 2013 Scoping Plan Update. AB 32 requires the state to reduce its greenhouse gas (GHG) emissions 25 percent by 2020. The ARB has developed dozens of measures, guidelines and regulations aimed at achieving this goal. The landfill regulation accounts for the second biggest emission reduction regulation approved by the ARB thus far, behind the Low Carbon Fuel Standard.

The Draft Waste Sector Management Plan includes nine measures for additional research; unfortunately all but one measure have a long-term time frame for implementation. All research measures should have their implementation accelerated to the short term. The background reports prepared by ARB provide justification for accelerated implementation of these research measures.

The ARB states that achievement of AB 32 GHG reduction goals relies on ARB staff estimates of GHG emissions from MSW landfills. However, according to CalRecycle, landfill methane emissions are extremely difficult to estimate and are subject to substantial uncertainty. Recent limited direct measurement studies and computer modeling (CALMIM) indicate that landfill methane emissions may be higher than previously estimated. CalRecycle suggests additional work is needed to evaluate the results of these limited studies and determine if it is appropriate to modify existing or develop new models to more accurately estimate landfill methane emissions.

Landfill methane emissions are extremely difficult to characterize and subject to substantial uncertainty. Recent limited direct measurement studies and modeling methods (CALMIM) indicate that landfill methane emissions may be higher than previously thought. Additional resources/research would be needed to improve landfill methane estimation techniques (both direct measurement and modeling).

Short term implementation of all research measures in the Waste Sector Management Plan are necessary to help local jurisdictions adequately evaluate MSW landfill projects and to ensure that the GHG emissions anticipated in the Scoping Plan will be realized.

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