

CITY OF OAKLAND



DALZIEL BUILDING · 250 Frank H. Ogawa Plaza · Suite 5301 · OAKLAND, CALIFORNIA 94612-2034

Public Works Agency
Environmental Services Division

FAX (510) 238-7286
TDD (510) 238-3254

July 12, 2013

Teri Wion
California Department of Resources Recycling and Recovery
P.O. Box 4025, MS-13A
Sacramento, CA 95812-4025

Re: Waste Management Sector Plan

Dear Ms. Teri Wion:

Thank you for the opportunity to provide input on the Waste Management Sector Plan (Plan) being developed by CalRecycle and the Air Resources Board (ARB). We have comments and concerns in three major areas.

1. We support the overall principles and priorities identified in the Overview of the Plan, particularly to:
 - Maximize recycling and diversion from landfills, including banning the landfilling of organics, and eliminating diversion credit for alternative daily cover
 - Build the infrastructure needed to support a sustainable, low-carbon waste management system in California, including expanding market development and facilitating the siting of critical processing facilities
 - Improve the economic sustainability of California's waste management infrastructure
 - Reduce the amount of waste generated

These measures are critical to the support and expansion of the state's existing recycling and composting infrastructure. In addition, they are environmentally sound methods of achieving greenhouse gas reductions using existing, proven processes.

2. We recommend that any waste-based energy technologies and feedstocks under consideration be addressed individually, using full life-cycle analyses to compare to source reduction, reuse, recycling and composting alternatives. Since the Plan acknowledges that "recycling, composting and anaerobic digestion, and biomass conversion result in even lower GHG emissions" than MSW Thermal facilities, and that MSW Thermal facilities compete with recycling, composting and anaerobic digestion, we recommend that consideration be given to eliminating Cap-and-Trade and Renewable Portfolio Standard credits for MSW Thermal facilities.



Teri Wion, CalRecycle

July 12, 2013

Page 2

3. We encourage development and strengthening of the Plan to:

- Set targets for reducing indirect emissions achieved through the reduction, reuse, recycling, and composting of solid waste
- Develop tradable emissions offsets for composting and digestion projects under the AB 32 cap-and-trade system
- Establish a state-level extended producer responsibility (EPR) framework, and prioritize toxic and difficult-to-recycle products for early implementation
- Prioritize use of the waste reduction hierarchy to optimize resource conservation and GHG reductions

We appreciate the work of CalRecycle and the ARB in moving forward California's climate protection policy.

Sincerely,



Susan Kattchee

Environmental Services Manager

Public Works Agency

City of Oakland

