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Sent: Thursday, June 20, 2013 8:01 AM
To: Climate Change CalRecycle
Cc: Kasey Kolassa
Subject: Comments on updated AB32 Scoping Plan

Dear Staff,

Thank you for all your good work on this plan. Below are a few comments, which I also made in person at the June 18 meeting.

Landfill Methane Capture

The decision made in 2008 to make this a high-priority, early-action item were on target, but have yet to produce results. Too many of our landfills have no methane capture system, and most of those that do are using outdated technology. Many of these still flare excess methane, and all leak methane into the atmosphere. We should make grants for installing AND upgrading landfill methane capture systems a top priority once cap-and-trade or other funds are available.

Compost

The planning and permitting required for compost operations is overly complicated, burdensome, long and expensive. It provides a disincentive for many jurisdictions to even attempt the process. Others waste scarce resources pursuing plans that are virtually identical to those proposed elsewhere in the state, but which are treated as unique projects requiring expensive consultants, planning and environmental work. Fortunately a solution lies on page 10 of the "Recycling, Reuse and Remanufacturing" section of this same report, which I will quote below:

" Work with other agencies, districts, and jurisdictions to identify and address conflicting permitting and regulatory requirements for recycling and remanufacturing facilities/operators.

Develop a model permit that could be used to streamline the permitting process across several agencies

Create Programmatic EIRs and guidance documents to assist project proponents in the completion of environmental review and compliance with CEQA "

This would be an excellent addition to the compost section of the report, and I recommend simply cutting and pasting it into that section.

I congratulate you on the efforts to coordinate the standards and procedures of CalRecycle, the Air Board and the Water Board, which have been frustratingly inconsistent. I would encourage you to add the Coastal Commission as well. Many of our most populous communities lie in the coastal zone, and the Coastal Commission can and does shut down projects that were approved by the other agencies. It is vital that they have a seat at the table and are a part of coordinated planning efforts.

I look forward to further discussions.

Thank you,

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