



March 28, 2008

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: LA County Sanitation District Letter Comparing Greenwaste ADC and Composting

Dear Chair Nichols,

Thank you for your leadership thus far in the implementation of AB 32. We have recently become aware of a presentation and letter submitted to the ARB by Los Angeles County Sanitation District regarding the relationship between greenwaste composting, alternative daily cover (ADC) at landfills, and greenhouse gas emissions. Based on our assessment of the materials provided, we believe this letter is clearly biased and not worthy of serious consideration by your board. That notwithstanding, we feel compelled to briefly respond to some of the more egregious claims.

The presentation submitted by Los Angeles County Sanitation District purports to have conducted a series of life cycle analyses, but we are concerned that the inputs that were chosen skewed the results in favor of ADC use, while inputs that favored composting were omitted. In addition, the presentation falsely concludes that composting emits more greenhouse gas emissions than landfilling—a conclusion directly contradicted by the California Integrated Waste Management Board, the US EPA, and the IPCC. The points below illustrate but do not attempt to completely catalog the problematic components that formed the basis for the presentation.

- The presentation **does not incorporate all the greenhouse gas benefits of composting**. While direct and indirect “sequestration” is included as a benefit of compost application, the largest GHG benefits of compost application are ignored. Specifically, the benefits of reduced irrigation (through stronger water retention and increased root infiltration) and the benefits of reduced emissions from the avoided application and production of synthetic fertilizers and pesticides are not even mentioned.
- There are several **false assumptions**. One such assumption is that the only alternative to using greenwaste as ADC is to truck in soil. There are other cover options, including plastic tarps, which would require no transportation. Another questionable assumption is that “freshly placed” greenwaste used as cover does not generate methane. This is a critical issue because in many circumstances green materials will quickly decompose, and the open face of the landfill is where gas collection is least effective.
- **The inclusion of “landfill sequestration” distorts the issue**. In its inventory, the Air Resources Board does not recognize any CO₂ sequestration in landfills. Landfills are

simply pools of slowly degrading dead carbon and do not remove carbon from the atmosphere any more than the lumber in a building or piece of furniture.

- The **emissions from transporting greenwaste to landfills for use as ADC are omitted** from the presentation but the emissions from transporting greenwaste to composting facilities are counted. There is absolutely no basis for this blatant inconsistency.

These “life-cycle models” appear to have been engineered towards a predefined result. Therefore, any resulting data from their analysis would not warrant serious consideration. We urge you to reject the unsubstantiated claims in this presentation and reserve valuable staff resources for legitimate analysis. We are confident that the ARB will approach this with the same rational methodology and technical acuity with which it has tackled related issues thus far in implementing AB 32.

Sincerely,

Scott Smithline

Californians Against Waste

Bill Magavern

Sierra Club California

Darby Hoover

Natural Resources Defense Council

CC: Members, California Air Resources Board
Members, California Integrated Waste Management Board
James Goldstene, Executive Officer, California Air Resources Board
Mark Leary, Executive Director, California Integrated Waste Management Board