



SF Environment

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GAVIN NEWSOM
Mayor

JARED BLUMENFELD
Director

November 13, 2007

Derek Markolf
California Climate Action Registry
523 West 6th. Street, Suite 428
Los Angeles, CA 90014

RE: Language to include in the "Landfill Project Reporting Protocol"

Dear Mr. Markolf:

Please accept these brief comments on the draft Landfill Project Reporting Protocol.

The San Francisco Department of the Environment is the lead agency for both the City and County's membership in the California Climate Action Registry and for implementing our aggressive recycling and waste reduction goals. San Francisco is presently diverting 69% of our waste. Our goal is to achieve a 75% recycling rate by 2010 and Zero Waste by 2020.

The Zero Waste strategy is not unique to San Francisco. Many California cities including San Jose and Berkeley now have similar targets and the California Climate Action Team's March 2006 final report identifies waste reduction as having an equal potential to reduce greenhouse gas emissions as landfill recovery within the 2020 timeframe.

Marin County and Santa Monica join us in submitting these comments. It is our opinion, and one we know to be shared by many other California cities and counties, that the Zero Waste approach is an absolutely critical component of meeting the Governor's 2050 goal of reducing economy-wide emissions by 80% below 1990 levels. The Zero Waste approach emphasizes a hierarchy starting with waste reduction. It is ultimately this approach that will lead to the most significant reductions in the "waste" sector with its ability to reduce emissions associated with the embodied energy in products.

It is very important that the Landfill project protocol does not adversely affect Zero Waste efforts. By only focusing on capturing energy at landfills there is an incentive to send more material to landfills. This will ultimately hurt both climate change and recycling efforts. With this in mind we strongly support the inclusion of the following language, which we understand to be under consideration:

"The Registry recognizes the importance of developing waste diversion and recycling incentive programs or protocols to assist in GHG reduction efforts. If sufficient waste diversion and recycling programs or protocols have not become operational and demonstrated effectiveness by 2013 this protocol will be temporarily suspended until such programs or protocols become operational and effective. The Registry will consult with interested stakeholders in this decision process."

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As municipalities, state agencies, businesses and other entities work to meet the goals set forth in both AB32 and the Governor's Executive Order S-3-05, one of the fundamental principles we need to apply to our near term work is whether or not the action we take now will make it easier or more difficult to meet our goals later. We would also urge the California Climate Action Registry to immediately begin developing recycling and composting project protocols as a means of ensuring that municipal agencies can continue to take decisive action to reduce greenhouse gas emissions.

We believe inclusion of the above language in the Landfill Project Protocol is necessary to ensure that the State's long-term goals are not hindered by the approach we take to landfills and waste disposal now. Thank you for your consideration and your hard work to build California's climate protection infrastructure.

Sincerely,



Jared Blumenfeld, Director
San Francisco Department of the Environment



Steve Kinsey, President
Marin County Board of Supervisors



Dean Kubani, Manager
City of Santa Monica
Environmental Programs Division

cc. Mary Nichols, Chair ARB