

1537 Webster Street  
Oakland, CA 94612

Ph: 510-891-6500  
Fax: 510-893-2308



November 9, 2007

Mr. Derek Markolf  
California Climate Action Registry  
523 West 6<sup>th</sup> Street, Suite 428  
Los Angeles, CA 90014

RE: Landfill Project Reporting Protocol

Dear Mr. Markolf,

Thank you for the opportunity to comment on the development of a protocol for landfill gas collection and combustion operations. Project developers that install landfill gas control technologies will use this protocol to register GHG emissions with the CA registry. We understand that one of the purposes of this activity is to allow landfill operators/owners to take advantage of opportunities in the emerging GHG or carbon-offsets market. We urge CCAR to also prioritize the development of a recycling reporting protocol.

While we are supportive of encouraging the capture and conversion of landfill gas to energy, we are concerned that incentivizing this activity through a reporting protocol will serve as a disincentive for additional recycling and composting which have no similar reporting protocol or incentive.

While we appreciate the efforts of the Registry to address this by including language to suspend this landfill reporting protocol if a recycling protocol is not operational by 2013, we believe such a recycling/composting protocol should be developed much sooner.

There is ample evidence to show that recycling/composting reduce significant amounts of GHG. Given the fact that the EPA has developed a model (WARM) for quantifying the GHG savings of various recycling/composting measures, we encourage the Registry to move forward immediately to develop such a protocol.

Developing a recycling/composting protocol would help to recognize the significant GHG reduction potential of recycling and composting and it would help expand the use of these measures for GHG mitigation. It would also help to economically incentivize the use of recycling/composting measures which are more environmentally benign than landfilling.

We urge CCAR to work in conjunction with CARB and CIWMB to prioritize the development of a recycling protocol. We would be happy to assist with the development of such a protocol.

Sincerely,

Karen Smith  
Executive Director

cc: Mary Nichols, CARB  
Mark Leary, CIWMB

*StopWaste.Org is the Alameda County Waste Management Authority & the Alameda County Source Reduction and Recycling Board operating as one public agency.*

*Member Agencies*  
Alameda County

Alameda  
Albany  
Berkeley  
Dublin  
Emeryville  
Fremont  
Hayward  
Livermore  
Newark  
Oakland  
Piedmont  
Pleasanton  
San Leandro  
Union City  
Castro Valley Sanitary District  
Oro Loma Sanitary District

*Agency Programs*  
Bay-Friendly Gardening & Landscaping

Green Building in Alameda County  
StopWaste Business Partnership  
irecycle@school  
Environmentally Preferable Purchasing  
Food Scrap Recycling  
Grants to Non-Profits  
Household Hazardous Waste Recycling  
Multifamily Recycling  
Recycling Information Hotline