



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

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June 7, 2010

Climate Action Reserve
523 W. Sixth Street, Suite 428
Los Angeles, CA 90014

Subject: Organic Waste Composting (OWC) Protocol – Public Comment Period

Thank you for allowing the California Department of Resources Recycling and Recovery (CalRecycle) to be part of the working group involved in developing the OWC protocol and accepting our input on the public review draft of the project protocol (version 1.0).

We are pleased with the latest draft of the protocol as it is written and appreciate the willingness to incorporate our previously suggested comments. We have listed our current comments below:

Section 3.4.2.2 Local Food Waste Diversion Mandates Enacted in Conjunction with a composting Project
This section was removed from the most current draft (Public Review Draft, Version 1.0). We recommend that this section be reinstated.

In the Organic Waste Digestion (OWD) protocol the Climate Action Reserve (CAR) correctly determined that feedstocks secured by enacting a local food waste diversion mandate in conjunction with an OWD project would be eligible for crediting. CAR's rationale in the OWD protocol that potential projects might not get started without local diversion mandates (e.g., regulatory requirements) in place is also germane to OWC projects. The large capital investment needed to initiate a food waste composting project, similar to an Organic Waste Digestion project, will often require the assurance of a consistent and steady foodwaste stream that in some instances would not be possible without a local mandate in place.

Section 3.4.1 The Performance Standard Test; and Section 6.4.1 Monitoring Requirements for Application of Finished Compost...

Please clarify the impact of this section on new grocery stores. Would feedstock from a new grocery store be eligible under the protocol or would the grocery store have to landfill food waste for a minimum of 3 years prior to being eligible? We recommend that waste from a new grocery store should be immediately eligible for the project.

Please feel free to contact us if you have any additional questions or if we can be of further assistance. We look forward to working with CAR on finalizing the OWC protocol and working together on future protocol development.

Sincerely,

A handwritten signature in black ink that reads "Brenda Smyth". The signature is written in a cursive, flowing style.

Brenda Smyth, Division Chief
Statewide Technical & Analytical Resources Division

