



# South Coast Air Quality Management District

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June 4, 2010

California Action Reserve  
523 West 6<sup>th</sup> Street  
Los Angeles, California 90014

**Re: SCAQMD Staff Comments on Organic Waste Composting Project Protocol,  
Public Review Draft Version 1.0, May 7, 2010**

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to review the Draft Organic Waste Composting Project Protocol. We have several technical concerns, the most serious relating to whether reductions under this draft protocol for California and other areas where landfills have controls in place to reduce methane would meet the additionality criteria.

In California, it would not be appropriate to give offsets for diverting waste from a landfill to a composting facility, as the landfill methane emissions are already very well controlled (in the SCAQMD jurisdiction) or will be soon due to the recent adoption of the California Air Resources Board Regulation to Reduce Methane Emissions from Municipal Solid Waste Landfills. This concept would also apply to other landfills throughout the United States that are receiving offsets through your Landfill Project Protocol.

We are available to discuss these comments. I can be reached at (909) 396-3104.

Sincerely,

A handwritten signature in cursive script that reads "Jill Whynot".

Jill Whynot  
Director of Strategic Initiatives