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**To:** CARB Staff  
**From:** Darby Hoover, NRDC (dhoover@nrdc.org)  
**Re:** Comments on Recycling and Waste in Draft Scoping Plan and Appendices  
**Date:** August 1, 2008  
**Via:** Electronic submission at <http://www.arb.ca.gov/cc/scopingplan/spcomment.htm>

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The goal listed in the Draft Scoping Plan pertaining to waste/recycling is right on target: “Increase waste diversion, composting, and commercial recycling, and move toward zero-waste.” (p.34) However, the only recommended policy measure is to control methane emissions from landfills, which does nothing to advance the stated goal.

We would like to see the recommendations pertaining to recycling and composting in the appendices to the Draft Scoping Plan strengthened per the recommendations in the ETAAC Report and adopted as recommended policies in the Proposed Scoping Plan to be released in October 2008. Specifically, we would like to see the Proposed Scoping Plan recommend the following policy measures:

- Adopt a requirement that commercial facilities generating over four cubic yards of waste per week (including multifamily recycling) must recycle;
- Impose disposal limits on readily recyclable materials for businesses;
- Phase out diversion credits for green waste used as alternate daily cover for landfills (ADC);
- Provide additional support for composting (which will also help to reduce emissions related to agriculture).

Given the global warming benefits of recycling and composting, as defined by EPA and others (see, e.g., <http://epa.gov/climatechange/wycd/waste/generalinfo.html>), it is important for recycling and waste policies to be mandatory – not just voluntary – and to include specific targets and measures to keep organic and recyclable materials out of landfills by increasing waste diversion, recycling and composting efforts in California.