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October 23, 2015

Richard W. Corey
Executive Officer
California Air Resources Board
1001 "I" St. Sacramento, California 95814

Dear Mr. Corey,

This letter supplements our comments provided at the Short-Lived Climate Pollutant Reduction Strategy Workshop held October 13, 2015 in Sacramento.

We support the Air Resources Board (ARB) consideration of a regulation to be promulgated by 2018 to reduce landfill methane. Such a regulation would:

- Require organics diversion from landfills
- Coordinate inter-agency leadership to establish materials processing infrastructure needed to handle diverted organics
- Expand compost and mulch markets for diverted organics
- Conduct science-based research to better quantify landfill methane emissions

We perceive significant benefits resulting from such a regulation including;

- In-state economic development and new jobs for the resource recovery industry – notably in the burgeoning digestion industry
- Reduced emissions from production and application of chemical fertilizers
- Decreased soil erosion
- Improved soil water retention
- Enhanced soil carbon storage with promising new developments such as those being developed and documented by the Marin Carbon Project which applies compost to rangeland with unprecedented carbon sequestration outcomes.



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We look forward to working with the ARB in the development of strategies to reduce methane emissions.

Sincerely,

John H Dane

John H. Dane
Executive Director

CRRA is California's state-wide recycling association. It is the oldest and one of the largest non-profit recycling organizations in the United States. A 501(c)(3) organization, CRRA is dedicated to achieving environmental sustainability in and beyond California through Zero Waste strategies including product stewardship, waste prevention, reuse, recycling and composting. CRRA advances local, regional and state-wide waste reduction efforts which result in critical environmental and climate protection outcomes. Our members represent all aspects of California's reduce-reuse-recycle-compost economy. They work for cities and counties, as well as hauling companies, material processors, non-profit organizations, state agencies, and in allied professions.