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California Resource Recovery Association

November 3, 2009

Clark Williams
California Integrated Waste Management Board
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Re: Organics Life Cycle Assessment (LCA)

Mr. Williams,

We appreciate the opportunity to comment on the draft Organics LCA tool. A multitude of problems with the LCA tool have come to our attention:

- There is significant concern that the LCA tool understates emissions from landfills and incorrectly overstates landfill benefits. In particular, attributing GHG benefit to carbon sequestration in landfills, while omitting this benefit to other end-of-life practices, is arbitrary and unjustified.
- The value assigned to reduced irrigation demand from compost application may be understated. Given that irrigation accounts for about 80% of or water use in California, slight errors in this value could mask and significantly under-value the benefit of compost use.
- Likewise the LCA tool neglects to value the avoided environmental degradation by replacing synthetic fertilizers, herbicides and pesticides through compost use.
- The assumption that AD, composting and chip and grind facilities are located 500% further from point of collection than landfills, waste to energy and biomass energy facilities, is arbitrary and unjustified. The model also fails to assess impacts from non-windrow composting activities.
- It has also been reported that the tool is unresponsive to changing the landfill methane recovery rate, and a number of other inputs. Since methane's atmospheric life is substantially less than carbon dioxide, the model could provide a real world option to assess immediate methane reduction impact.
- Other reports question that a number of Process Burdens are overstated, and that source references are vague or difficult to verify.

We feel that there are ample concerns that inaccurate or inappropriate assumptions, omissions, and flaws with the functionality and transparency of the LCA tool, render it unsuitable for release or use at this time.

Sincerely,

J. Muir

Julie Muir, President

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