



June 1, 2010

Jim Krider, NCTPA Chair
 Cynthia Saucermann, NCTPA Vice-Chair
 Napa County Transportation and Planning Agency
 707 Randolph Street, suite 100
 Napa, CA 94559

Re: Comments on the Napa County Community Review Draft Climate Action Framework

Dear NCTPA Board Members:

Edgar & Associates, Inc. represents Upper Valley Disposal Service, Upper Valley Recycling and Composting, and Clover Flat Landfill, regarding future planning, permitting and regulatory compliance matters in Napa County. UVDS, UVR and the CFL are now poised to transform the Clover Flat Landfill into the Clover Flat Resource Recovery Park to meet the measures of AB 32, the California Global Warming Solutions Act of 2006, and to provide additional food material composting at UVR. AB 32 resulted in the adoption of the AB 32 Scoping Plan in 2008 that included a series of measures adopted by the California Air Resources Board for High Recycling/Zero Waste as listed below, which will affect the solid waste and recycling sector and local government. The key measures of AB 32 include mandated Commercial Recycling, Anaerobic Digestion, the increased use of Compost, and Extended Producer Responsibility (EPR).

**Recycling and Waste Sector Recommendation - Landfill
 Methane Capture and High Recycling/Zero Waste
 (MMTCO₂E in 2020)**

Measure No.	Measure Description	MMTCO₂E Reductions
RW-1	Landfill Methane Control (Discrete Early Action)	1
RW-2	Additional Reductions in Landfill Methane <ul style="list-style-type: none"> • Increase the Efficiency of Landfill Methane Capture 	TBD
RW-3	High Recycling/Zero Waste <ul style="list-style-type: none"> • Mandatory Commercial Recycling • Increase Production and Markets for Organics Products • Anaerobic Digestion • Extended Producer Responsibility • Environmentally Preferable Purchasing 	5 2 2 TBD TBD
	Total	10

The Community Review Draft dated December 2009 has been circulated for review with detailed comments attached by UVDS, UVR and CFL in relation to the long-term programs

currently under consideration. Our comments support all of the programs listed below, as they conform to the AB 32 Scoping Plan, and are programs that UVDS, UVR, and CFL are operating now, and will be expanding in the future.

UVDS Comments:

1. Six Goals and 53 Actions for GHG Reductions – page 11:

UVDS supports the six major goals, including:

Reduce Consumption and Solid Waste: Significantly reduce the amount of waste produced in the cities of the County.

2. Objective BE2: Improve the energy supply by switching from fossil fuels to renewable – page 49:

- UVDS supports this objective, as there are plans to add 1 MW of biomass energy at the Clover Flat Resource Recovery Park, and convert the current landfill gas flare into energy.
- As stated on page 50, the Clover Flat Landfill plans to convert the landfill gas flare into renewable energy.
- UVDS supports the efforts of the city's wastewater treatment plant to produce energy from the bio-solids.

3. Objective SW1 – Achieve overall waste diversion of 75% to 90% by 2020 – page 50:

- UVDS and CFL, with the full support of UVWMA, added a mixed C&D processing in at CFL which increased the recycling rate by over 10%.
- UVDS is proposing commercial and residential food waste diversion projects.
- UVDS will be ramping up the commercial recycling program.

Action SW1.1. – page 51:

- UVDS supports increasing the overall diversion rate, as an increase in recycling results in large amounts of avoided indirect GHG emissions.

Action SW1.2. – page 52:

- UVDS supports enacting ordinances and create incentives to achieve organic waste diversion of 75% by 2020.

Action SW1.3. – page 52:

- UVDS supports the Napa County Green Business Program, and has participated in LEED programs by offer recycled construction materials.

Action SW1.4. – page 52

- UVDS supports environmentally preferable purchasing policies, and focused extended producer responsibility for household hazardous waste such as sharps, pesticides, and propane tanks, as proposed by AB 2139 (Chesbro).

Action SW1.5. – page 53

- UVDS supports food waste collection and composting programs.

4. Goal 4. Conserve Agriculture, Natural Resources, and Urban Forest (AN) – page 56:

UVDS has produced high quality organic-certified compost from agricultural “waste” in the Upper Valley since the early 1990’s. UVDS also has collected and processed green waste for use as compost feedstock, and mulches for erosion control. UVDS plans to expand their collection program for commercial and residential food waste to produce compost. The use of compost has shown to decrease water usage by up to 30% on certain crops, and has positive carbon sequestration attributes.

- UVDS supports conserving agriculture, and the strategy for agricultural wastes to be used to increase soil health and increase yields, and has participated in many research studies over the years, on the value of compost.
- UVDS has established the local facility to process all residential green waste, and plans to expand the program for residential food waste.
- UVDS is exploring the feasibility of anaerobic digesters.

UVDS, UVR and CFL committed to voluntarily estimate their combined greenhouse gas (GHG) emissions inventory for the Calendar Year 2006 as a means to understand the greenhouse gas impacts associated with the three related businesses. A summary of the GHG inventory is attached where the total operations are 4.5 times carbon negative when accounting for the avoided indirect emission attributed to recycling.

The proposed AB Recycling Plan by UVDS, UVR, and CFL for the solid waste and recycling sector to address the Climate Action Framework includes the following:

- UVDS to offer commercial food waste collection and composting at the Clover Flat Resource Recovery Park.
- UVDS to offer residential vegetative food material and green waste co-collection with processing and composting at UVR.
- CFL has filed a CUP to create the Clover Flat Resource Recovery Park that will include mandated commercial recycling processing, commercial foods waste processing, increase storage of recyclables, renewable energy production, and increased recycling services until 2047.

We appreciate the opportunity to comment on the draft Climate Action Framework. Should you have any questions, please call me at (916) 739-1200.

Sincerely,

A handwritten signature in black ink, appearing to read "Evan W.R. Edgar". The signature is stylized and cursive.

Evan W.R. Edgar, Principal