

Alameda County Waste Management Authority
Allied Waste Services
Breathe California
California Resource Recovery Association
Californians Against Waste
Center for Biological Diversity
Coalition for Clean Air
Environmental Defense Fund

Natural Resources Defense Council
Norcal Waste Systems, Inc.
Northern California Recyclers Associate
Planning and Conservation League
San Francisco Department of the Environment
Sierra Club California
Waste Management

November 19, 2008

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Mandatory Commercial Recycling in AB 32 Scoping Plan

Dear Chair Nichols,

Thank you for your continued acknowledgement of the potential of recycling to achieve the goals and intent of AB 32. Recycling is one of the most cost-effective and proven emission reduction measures

It is time for all of California's businesses to do their part in reducing emissions. Requiring businesses statewide to implement appropriate recycling programs is the most cost-effective way to capitalize on the greenhouse gas reduction potential of recycling. Therefore, we request that you make the following change on page 63 of the Proposed Scoping Plan before adopting it at your December board meeting:

~~“As noted by ETAAC, recycling in the commercial sector could be substantially increased. This could be implemented, for example, through voluntary or mandatory programs, including protocols, enhanced partnerships with local governments, and provision of appropriate financial incentives. ARB will work with CIWMB to develop and implement these types of programs. ARB will work with the CIWMB to require any business that generates 4 or more cubic yards of waste per week to implement a recycling program that is appropriate for that type of business.”~~

We look forward to working with you and your staff on this important issue, as well as the implementation of the other waste reduction and recycling measures in the plan.

Sincerely,

Karen Smith
Alameda Co. Waste Management Authority

Darby Hoover
Natural Resources Defense Council

Chuck Helget
Allied Waste Services

Rachel Oster
Norcal Waste Systems, Inc.

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Jack Macy
San Francisco Department of the Environment

Brian Nowicki
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Bill Magavern
Sierra Club California

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Coalition for Clean Air

Kent Stoddard
Waste Management

Derek Walker
Environmental Defense Fund

CC: Senate President Pro Tem Don Perata
Assembly Speaker Karen Bass
Senator Darrel Steinberg
Linda Adams, Secretary for Environmental Protection
Members, California Air Resources Board
Members, California Integrated Waste Management Board