

**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 available. While we appreciate your staff's attempts to improve the Recycling and Waste Management section of the Scoping Plan, the proposed plan should be strengthened to capitalize on one of California's largest untapped recycling opportunities: mandatory commercial recycling.

**Why Recycling?**

Recycling has many clear benefits as an AB 32 strategy, including its significant potential to reduce emissions across sectors, its economic benefits, and its broad base of support. Increasing recycling would result in a reduction in emissions from transportation, resource extraction, and manufacturing within the state, and these reductions are only the tip of the iceberg given the substantial cross-sector and international lifecycle benefits associated with the use of secondary materials. The Proposed Scoping Plan acknowledges that these emission reductions could exceed 5 million tons of CO<sub>2</sub>, which is the equivalent of taking over a million cars off the road each year. Furthermore, according to the CIWMB, recycling has twice the economic benefit of landfilling and provides large numbers of "green jobs." CIWMB has estimated that each additional ton of waste recycled generates \$101 more in salaries, \$275 more in goods and services, and \$135 more in sales than landfilling the same material. Finally, recycling has wide-ranging support and provides a great opportunity for all Californians to contribute to the state's climate efforts.

**Why Focus on the Commercial Sector?**

The commercial sector comprises two-thirds of California's waste stream. Despite this, local diversion efforts have largely focused on residential recycling. For example, while California as a whole diverts 54% of its waste, large office buildings divert only 7%. More than half of the material disposed at these buildings consists of readily recyclable paper and cardboard. Other businesses also recycle at far lower rates than the rest of the state. Similarly, while the majority of those living in single family housing have ready access to residential curbside recycling, nearly 60% of residents of multi-family housing (considered part of the commercial sector) still lack basic recycling service.

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**

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**Allied Waste Services**

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Jack Macy  
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Brian Nowicki  
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Bill Magavern  
**Sierra Club California**

Shankar Prasad  
**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