

January 23, 2007

Mr. Robert Sawyer, Ph.D., Chairman
California Air Resources Board
1001 I Street,
Sacramento, CA 95814

Dear Chairman Sawyer:

Re: Early Action Measures -- Waste Reduction and Recycling

Thank you for the opportunity to participate in this groundbreaking process. We are writing to urge you to enact several early action measures for the solid waste sector that will significantly reduce greenhouse gas emissions while having a positive impact on the economy. A modest 25% reduction in disposal of materials commonly collected in curbside programs could deliver 5 MMTCO₂E of GHG reductions, an amount equal to over half the GHG emissions from the solid waste sector¹.

Ton for ton, recycling reduces more pollution, saves more energy and reduces GHG emissions more than any other solid waste management option. Despite a robust materials collection infrastructure and achievement of a 50% diversion rate statewide, Californians disposed over 42 million tons of solid waste in 2004. Over 60% of these materials were recyclable.² When disposed they generated 8.45 MMTCO₂E of GHG emissions.³

Recycling reduces GHG emissions in two important ways. First, recycling keeps materials out of the landfill, thus avoiding methane emissions. More importantly, recycling reduces emissions associated with the mining, processing, and transportation of virgin resources. Everyday consumer products such as paper and aluminum cans are made from virgin materials mined from the earth, transported great distances, and eventually processed with industrial machinery. This all results in significant GHG emissions. We simply cannot afford to continue to waste these precious commodities.

Recycling offers multiple benefits as an Early Adoption Measure

Recycling offers unique benefits as an Early Adoption Measure, both substantively and symbolically. Early adoption measures that reduce methane emissions will yield greater immediate results than CO₂ based strategies alone. Methane has 23 times the climate forcing potential than CO₂, and has a lifespan of only 12 years. Thus, a single ton of CH₄ will have 23 times the impact over 12 years that a ton of CO₂ will over 100. Ensuring methane reduction is part of the early adoption measures will help achieve a quick initial reduction in GHG.

Recycling is also widely accepted and has a proven economic track record. Increasing recycling will achieve significant GHG reductions without investment in new technologies or systems.

¹ All GHG reduction estimates were generated using the National Recycling Center Environmental Benefits Calculator. Reductions in Greenhouse Gas Emissions through Recycling is based on the data and methodology developed by the U.S. Environmental Protection Agency.[i] EPA based most of its calculations on data from Franklin Associates,[ii] Research Triangle Institute, [iii] and research on methane emissions by N.C. State University.

² CIWMB

³ Inventory of California Green House Gas Emissions and Sinks: 1990-2004. p 73. California Energy Commission, October 2006.

Increasing flow through California's existing materials recovery and recycling infrastructure will generate significant economic benefits. The CIWMB has estimated that recycling waste has twice the economic benefit of landfilling the same material.⁴

Recycling is one of the few activities that allows ordinary citizens and businesses to take proactive steps to protect their environment. It is widely accepted, readily implemented, and can deliver significant GHG reductions.

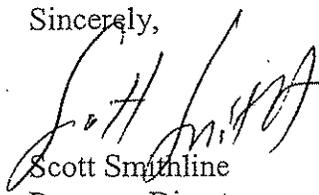
Expansion of Curbside Recycling. Residential waste accounts for 32% of California's overall waste stream. Paper, cardboard, glass and metals are among the most prevalent materials in the residential waste stream. Despite their popularity and effectiveness, just half of California residents have access to convenient and cost effective curbside recycling. It should be the policy of the CIWMB to bring curbside recycling to every household (single and multi-family) by 2010.

Expansion of Commercial Recycling. Commercial waste accounts for 47% of California's overall waste stream. Cardboard and paper make up the single largest component of commercial waste, making up over 26% of the stream. Over the last decade thousands of California businesses have seen their waste management costs reduced through the establishment and expansion of commercial waste recycling. However, for many medium and small businesses in California, there remains a disconnect between the waste they generate on a day-to-day basis, and the portion of their business overhead costs which go to waste management. It should be the policy of the CIWMB to require commercial enterprises to obtain recycling services by 2010.

Material Specific Disposal Bans. A surprisingly small number of readily recyclable materials (e.g. corrugated cardboard and mixed paper), account for the lion's share of California's GHG emission reduction potential. In addition to those materials disposed through residential and commercial collection, approximately 20% of disposed waste is hauled directly to the landfill by residents and businesses. Of this material, over half is readily recyclable construction and demolition debris (C&D). Material Specific disposal limits would require all Californians to limit their disposal of recyclable materials such as cardboard, paper, or C&D, regardless of whether it is collected by a refuse company or self hauled to the landfill.

These early action measures are a good first step toward reducing greenhouse gas emissions from the solid waste sector, yet they only scratch the surface. We believe that waste reduction and recycling represent not only an opportunity to reduce existing emissions from the waste sector, but provide an opportunity for significant additional reductions deep within the energy and transportation sectors. We look forward to working with you on implementing AB 32.

Sincerely,



Scott Smithline
Program Director

⁴ CIWMB State Agency Workplans, December 2005.

cc: Linda Adams, Secretary, California Environmental Protection Agency
Margo Reid Brown, Chair, California Integrated Waste Management Board
Catherine Witherspoon, Executive Officer, Californian Air Resources Board
Anne Baker, Deputy Secretary, Cal-EPA.
Eileen Tutt, Assistant Secretary for Climate Change, Cal-EPA
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