



February 22, 2007

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

Re: Strong Support for ETAAC Recommendations on Waste Reduction and Recycling

Dear Chair Nichols:

We would like to commend the efforts of the ETAAC committee in creating a comprehensive and well thought-out set of recommendations regarding achieving AB 32 goals through waste reduction, recycling, and composting. We encourage you to adopt the report and to implement the recycling strategies outlined in sections J, K, L, M, and N of the Industrial Sector (page 4-14 to 4-19).

The discrete policy suggestions laid out in these sections are recommendations that will allow the state to significantly reduce greenhouse gas emissions from the mining, manufacturing, forestry, agriculture, transportation, electricity and waste management sectors. According to EPA estimates, reducing current disposal by only 25% would reduce greenhouse gases by 5 MMTCO₂E. Unlike many other greenhouse gas reduction technologies, recycling and composting are also widely accepted and have a proven economic track record. GHG reductions from this sector can be attained by utilizing and expanding the existing infrastructure without significant investment in new technologies or systems. Moreover, the CIWMB estimates that increasing the flow through California's existing materials recovery and recycling infrastructure will have twice the economic benefit of landfilling the same material.

Despite recycling's proven environmental and economic track record, there are currently many barriers to the expansion of California's waste diversion infrastructure. The recommendations presented in Sections J through N would go a long way towards removing these barriers and maximizing the greenhouse gas reduction potential of this

sector. For this reason, we urge you to adopt this report and implement these recommendations as part of the AB 32 Scoping Plan.

Sincerely,

Scott Smithline
Californians Against Waste

Bill Magavern
Sierra Club California

Timothy O'Connor
Environmental Defense

Pete Price
California League of Conservation Voters

Jason Barbose
Environment California

cc: Members, Air Resources Board
Member, California Integrated Waste Management Board
James Goldstene, Executive Officer, ARB
Chuck Shulock, Executive Office, ARB
Edie Chang, Program Planning and Management Branch, ARB