



LINDA S. ADAMS  
SECRETARY FOR ENVIRONMENTAL  
PROTECTION

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**CALIFORNIA INTEGRATED  
WASTE MANAGEMENT BOARD**



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Chair

MARGO REID BROWN  
CHAIR  
MBROWN@CIWMB.CA.GOV  
(916) 341-6051

November 19, 2008

Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

WESLEY CHESBRO  
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Dear Chair Nichols:

ROSALIE MULÉ  
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I continue to appreciate the work our respective staff are doing collaboratively in support of the completion of the "Climate Change Proposed Scoping Plan: A Framework For Change," which the Air Resources Board (ARB) will be discussing on November 20. The Plan is truly a landmark in the history of environmental policy making and will define sustainability activities for years to come.

CHERYL PEACE  
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One aspect of the Recycling and Waste Measure within the Plan; implementation of commercial recycling, has received substantial attention from various stakeholders, including the ETAAC and the GWAC. As the Proposed Scoping Plan indicates, increasing commercial recycling and using those materials in the manufacturing process will substantially reduce greenhouse gas emissions. Commercial recycling also is a linchpin in the CIWMB's efforts to divert more materials from landfills.

GARY PETERSEN  
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The CIWMB supports a mandatory approach to commercial recycling in the Scoping Plan. This is different than how the plan is currently drafted and is sought by many commenter's to the plan. However, we also propose that we should soon clarify, in the plan or otherwise, whether the CIWMB has authority under AB 32 to implement such an approach or needs to seek additional statutory authority to do so.



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In support of this measure, the CIWMB has engaged in a study to examine the costs and benefits of implementing and/or expanding commercial recycling programs statewide in the interest of firmly establishing its cost effectiveness and of moving forward with a well-informed process for rulemaking.

We look forward to discussing other issues with your staff relative to commercial recycling and other measures. These include the availability of financial assistance (e.g., revenue from allowances, offsets, fees) to provide incentives for commercial recycling and how this would be affected by a mandatory approach. We also need to discuss the availability of a funding source to support CIWMB resources needed for implementation and oversight.

In closing, I want to thank you for your consideration of these issues and look forward to discussing them with you in more detail.

Sincerely,

  
Margo Reid Brown  
Chair