



# California Resource Recovery Association

November 18, 2008

Margo Brown, Chair, CIWMB  
1001 I Street  
Sacramento, CA 95814

## President's Circle Sponsors



RethinkWaste.org

RecycleWorks

Bayside Environmental  
Services & Transfer

CA Integrated Waste  
Management Board

CA Department of  
Conservation

US EPA – Region 9

Sunset Waste Systems

City of Los Angeles

The views expressed in this letter do  
not necessarily represent those of  
the Sponsors listed above

### RE: Omission of Zero Waste Emissions Reductions in AB 32 Scoping Plan

Dear Chair Brown:

The California Resource Recovery Association (CRRRA) is a statewide non-profit trade group. CRRRA's more than 450 members represent all aspects of California's reduce-reuse-recycle-compost economy.

CRRRA is extremely disappointed that the emissions reductions associated with Measure RW-3 High Recycling/Zero Waste are not counted toward the AB 32 goal in the October 2008 Proposed Scoping Plan (Plan). Specifically, footnote #43 in Table 20 on page 63, Section II.15 Recycling and Waste, states, "*Reductions from RW-2 and RW-3 are not counted toward the AB 32 goal.*" Furthermore, the Plan recommends no specific actions or policies to implement RW-3

Zero Waste/High Recycling was established as a "high-confidence" strategy with GHG reduction potential of 10 million tons CO<sub>2</sub> equivalent by 2020 in the Climate Action Team's *Strategies Underway In California That Reduce Greenhouse Gas Emissions*. The linkage between CIWMB Strategic Directives and climate protection was discussed extensively at the February 13, 2007 Board meeting when CIWMB adopted its Strategic Directives. Thus, it is particularly disappointing that CIWMB has failed to ensure that the Plan includes any specific actions or policies supporting implementation of its own Strategic Directives No. 6.1 (Reducing organics to landfill), and No. 5.2 (Extended Producer Responsibility).

In its lead advisory capacity to the California Air Resources Board (CARB) for developing the Recycling and Waste Section of the Plan, CIWMB must ensure that the significant emissions reductions available through High Recycling/Zero Waste measures are counted, and that specific actions and policies are recommended.

CRRRA hereby petitions CIWMB to take urgent action to ensure that the Plan is revised to count RW-3 emissions reductions towards the AB 32 goal, and to add specific actions and policies to achieve RW-3 reductions, including: mandatory commercial recycling; phase-out of diversion credit for green waste alternative daily cover; and adoption of Extended Producer Responsibility framework legislation.

I would welcome the opportunity to meet with you and other Board members to discuss this matter.

Thank you for your consideration and action.

Sincerely,

Julie Muir, President

cc: CIWMB Board Members  
California Air Resources Board

P.O. Box 607  
Clovis, CA  
93613-0607  
916.441.CRRRA [2772]  
Fax 916.676-4882

AFFILIATE OF



NATIONAL  
RECYCLING  
COALITION  
INC.  
<http://www.nrc-recycle.org>