



July 15, 2013

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

Carroll Mortensen, Director
CalRecycle
1001 I Street – P.O. Box 4025
Sacramento, CA 95812

Via Email:

Subject: Comments – Waste Management Sector Plan for the 2013 Scoping Plan Update

Dear Ms. Nichols and Ms. Mortensen:

On behalf of Recology, Inc., I am writing to express our overall support of the work the California Air Resources Board (CARB) and CalRecycle have done on the Waste Sector Element of the 2013 Scoping Plan. I am also writing regarding a few areas of concern we have. Recology recognizes the July 12, 2013 comment letter written by the Solid Waste Industry Group (SWIG) and the Solid Waste Industry for Climate Solutions (SWICS). While we agree with several points made by SWIG/SWICS, we do not agree on all nor do we agree with some of their supporting documents, therefore, we are submitting our own comment letter.

As with SWIG/SWICS, Recology agrees with and supports CARB/CalRecycle's overall goals for the waste sector. These include streamlining the permitting process for new and expanded recycling and composting infrastructure, funding and incentivizing new infrastructure, expanding the markets for recycled materials and products, and increasing public education and California's sense of ownership of its own waste.

Additionally, Recology supports the proposal of the waste sector's achieving the AB 341 75% recycling goal as a way to reach its AB 32 2020 greenhouse gas (GHG) emissions reduction target. However, as with SWIG/SWICS, we believe the AB 341 recycling definition should be based on the law as it currently stands. CalRecycle's exclusion of "disposal-related" items from its recycling calculation is contrary to current law. Specifically, green waste as alternative daily cover (ADC) is currently considered as recycling, therefore, it should remain as such under AB 341 recycling calculations. That being said, Recology fully supports a phase out or even a full legislative ban of the use of green waste as ADC, at which point an AB 341 recycling calculation would not include green waste as ADC as it would then be considered disposal.



Furthermore, Recology fully supports legislation requiring large generator organics recycling. We agree with SWIG/SWICS that a mandatory organics recycling program will be significant in the waste sector's achievement of AB 341's 75% recycling goal and AB 32's 2020 GHG emissions reduction target.

We thank you for your time and effort in preparing the Waste Sector Element of the 2013 Scoping Plan and for considering our comments. Please feel free to contact us with any questions or comments.

Sincerely,

Rachel Oster
Director of External Affairs
Recology

Cc: Howard Levenson, CalRecycle
Scott Smithline, CalRecycle
Edie Chang, CARB
Mike Tollstrup, CARB