

**E-Mail from Jim Dodenhoff, President, Silent Running (January 18, 2007) Regarding the 2007 Revision of the California Integrated Waste Management Board's Five-Year Plan for the Waste Tire Recycling Management Program (covering fiscal years 2007/08-2011/12)**

Unfortunately, I am unable to attend today's workshop; however, I am attaching a letter I previously submitted to the Board in October 2006 commenting upon the 5-year Plan. I hope my input will be incorporated into the record and considered as the 5-year Plan is updated.

I remain particularly interested in US-Mexico border initiatives that go beyond the study phase and provide tangible environmental and economic development benefits to the US-Mexico NAFTA region. In February there will be a meeting in Austin of the Border 2012 Scrap Tire Management Initiative. A number of members of the CIWMB are part of this major initiative. California has ample funding in the Tire Fund to assist in this important and noble endeavor and while I understand that there are obstacles to direct expropriation of US taxpayer dollars to Mexico, there are many other avenues to provide assistance including technology transfer, funding of border projects domiciled in the US, but which provide affordable recycled rubber products. I have been to Mexico twice since I wrote the original attached comment letter and remain convinced that because of the large amount of used tire sales from the U.S. to Mexico (and Baja California North in particular), California and Mexico have a symbiotic relationship with respect to scrap tire management.

I also simply want to reiterate my belief that the Board must work with the State Legislature and seek to change legislation currently preventing it from considering or assisting in any endeavors that promote the use of tires or tire derived fuel as a source of energy. Today's high-priced energy environment, combined with strong and undisputable evidence that tires and TDF used as a fuel supplement for coal provide *benefits* with respect to global warming, require that the Board allocate some of its ample tire program funding to promote TDF. I am mindful of the argument that "fuel" is not waste; however, the vast majority of fuel consumption of TDF in California is by cement kilns, and virtually all of these kilns charge a fee to accept whole tires as fuel. This is a distortion in the marketplace that the Board can assist in remedying.

Finally, having been through three 5-year Plan reviews, I think it would be helpful and useful to stakeholders to provide, as part of this process, an updated plan and a written narrative analysis of major stakeholder concerns, issues, and input explaining, how the Board took this input into account and the basis for its response to the input. By providing this "process narrative" I believe that the Board will alleviate any concerns that it is not being adequately responsive to stakeholder input.

I appreciate having the opportunity to provide input to this process. Do not hesitate to contact me should you have any questions regarding this input.

Sincerely,

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