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September 29, 2011

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

**Re: Proposed Mandatory Commercial Recycling Regulation**

Dear Chairman Nichols:

On behalf of the California State Association of Counties (CSAC), I write to express our support for the proposed regulation to reduce greenhouse gas (GHG) emissions through a mandatory commercial recycling regulation, and we greatly appreciate the opportunity to comment on the measure. CSAC is an association that represents county government before the California Legislature, administrative agencies and the federal government. Representing all 58 of California's Counties, CSAC places a strong emphasis on educating the public about the value and need for county programs and services critical for healthy communities.

In November 2007, the CSAC Board of Directors voted unanimously to adopt a climate change policy, including guidelines regarding all different sectors affected by climate change, including solid waste and recycling. Counties recognize that recycling and waste prevention can reduce GHG emissions by reducing the amount of energy needed to process materials, and reducing the amount of natural resources needed to make products.

Local governments across California are developing their own climate protection plans, demonstrating leadership through creative approaches to reducing their greenhouse gas emissions. CSAC's role has focused on continued outreach with state, regional and local partners to provide education and resources and to represent local government as climate change regulations and implementation strategies are developed. To this end, CSAC is very supportive of the Institute for Local Government (ILG), the research arm of CSAC and the League of California Cities, and their work to develop a model commercial recycling ordinance for local governments. Their work is indispensable to local governments with limited resources, helping them achieve the best and highest outcomes. The work ILG has done to help advance the proposed regulations, including case studies, sample public outreach documents and the model ordinance, will go a long way towards assisting cities and counties with their efforts to comply with the proposed measure.

CSAC appreciates the flexibility incorporated into the proposed regulations, allowing local governments to construct a commercial recycling program that works for their respective communities, utilizing existing infrastructure and resources. This is all too important during a time when every revenue stream, and certainly all of the



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important ones (property tax, sales tax, and state funding), have fallen precipitously, and almost every county has already implemented or is strongly considering deep cuts and widespread layoffs.

Finally, while not a part of this particular proposal, CSAC supports the move towards greater manufacturer responsibility and a product stewardship framework. While recycling can go a long way towards reducing GHG emissions, reducing the amount of packaging and encouraging manufacturers to design environmentally-friendly products will help encourage more sustainable, less toxic, and easily recyclable products.

CSAC appreciates your consideration of these comments. We look forward to working with you in the future to address climate strategies. If you have any questions about our comments or position, please feel free to contact Karen Keene at 916/327-7500 ext. 511 or [kkeene@counties.org](mailto:kkeene@counties.org), or Cara Martinson at 916/327-7500 ext. 504, or [cmartinson@counties.org](mailto:cmartinson@counties.org).

Sincerely,

A handwritten signature in black ink that reads "Karen Keene". The signature is written in a cursive, flowing style.

Karen Keene  
CSAC Senior Legislative Representative

cc: Mark Leary, Acting Director, Department of Resources Recycling and Recovery