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November 1, 2013

Mary Nichols, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

**Re: Comments on 2013 Update to AB 32 Scoping Plan -
Waste and Recycling Sector**

Dear Chair Nichols:

The California Compost Coalition (CCC) is a statewide organization representing operators of permitted facilities involved in the processing and composting of green and food waste materials throughout California. On behalf of these companies, we respectfully submit the following comments on the 2013 Update to AB 32 Scoping Plan. We are in strong support of investment that will enhance the diversion of organic waste to bioenergy, biofuels, and composting, including increasing development of carbon negative fleets from anaerobic digestion in the Waste and Recycling Sector. We also believe that more emphasis should be focused on compost application to agricultural soils which will provide carbon sequestration and improve nitrogen management for the Agriculture Sector.

CCC shares your ***Vision for 2020 and Beyond*** to build the infrastructure for a low-carbon system in California and improve the sustainability of the California infrastructure. CCC supports the concept of Net-Zero Facilities where the direct GHG emissions from our operations are less than the avoided GHG emissions from our operations. Whereas many in the Waste Sector has been focused on the landfill, CCC members have been busy reducing the direct emissions from our fleets and developing recycling and compost facilities that are Net-Zero today.

CCC strongly supports the following programs as part of 2013 Update to Scoping Plan:

- Produce carbon negative fuel for the 15,000 heavy duty collection trucks in California
- Develop Net-Zero recycling and composting facilities

- Support distributed renewable energy from biomass and biomethane development
- Utilize “cap-and-trade” revenue to assist in funding the above programs
- Increased use of compost as an organic soil amendment as a carbon sequestration strategy and for improved nitrogen management through the reduction in use chemical fertilizers; in both cases, additional research is needed to fully understand the benefits to particular crops, soil types, and in conjunction with varying agricultural practices.

CCC has previously provided detailed comments to your staff regarding the CARB/CalRecycle Technical Papers, which support the development of a low-carbon system in California today and improve the sustainability of the California infrastructure for tomorrow. Beyond our submitted recommendations for potential investment concepts that will be needed to enhance growth of the organics processing segment of the Waste Sector, “White Paper to the California Air Resources Board: Investment of Cap and Trade Auction Proceeds – Diversion of Organic Waste to Bioenergy and Composting”, we are expectant that additional details will be input into the final Scoping Plan update to include specific organic waste diversion targets previously identified in your technical papers.

We appreciate the opportunity to comment on these regulatory concepts and look forward to working with you through the completion of this rulemaking process.

Should you have any questions, please contact me at (916) 739-1200.

Sincerely,



Neil S.R. Edgar
Executive Director

cc: Cliff Rechtschaffen, Senior Advisor to Governor Brown
Ana Matosantos, Director, Department of Finance
Matt Rodriguez, Secretary, California Environmental Protection Agency
Caroll Mortensen, Director, Department of Resources Recycling and Recovery