

Subject: ETAAC

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Date: Sat, 12 Jan 2008 09:19:57 -0600

To: schurch@arb.ca.gov

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Mr. Church:

The Construction Materials Recycling Association (CMRA) is a 501c3 non-profit organization that promotes the recycling of construction and demolition (C&D) materials. Until recently, we were not aware of the ARB's Economic and Technology Advancement Advisory Committee's work. Looked over the draft report that will be discussed on January 25, and for the sectors that affect the recycling of C&D materials and solid waste in general, overall it looks pretty much on target and makes good sense. However, there are a few points we would like to clarify, if possible. Is it too late for comments?

Related to that are two points:

The committee must know that the US EPA considers the use of biomass, including that made from C&D wood, to be carbon neutral; Attached is a life cycle analysis the University of New Hampshire did looking at using C&D wood as a fuel product versus landfilling it, basically the only two options for much of the wood in our stream. We suggest something like this done in California could be very useful to the committee's decisions.

Please let me know if we can be of any more assistance to you, as the use of C&D wood as a fuel product is very important to the continued health of the C&D recycling industry.

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NH LCA Report 05Dec07.pdf

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