September 1, 2015

VIA E-MAIL & U.S. POST
California Air Resources Board
1001 I Street
Sacramento, California 95812

RE: Draft Cap and Trade Auction Proceeds Triennial Investment Plan

The California Refuse Recycling Council (CRRC) appreciates the opportunity to comment on the Cap-and-Trade Auction Proceeds Second Investment Plan (FY 2016-17 through 2018-19) Concept Paper. The CRRC is a trade association of haulers, processors, recyclers, and composters with members throughout the State of California. CRRC members have a long history of sustainable waste and recycling management, including organics processing through composting and anaerobic digestion. As such, we are active participants in the Governor’s new Healthy Soil initiative. Concurrently, we continue to support climate change efforts in California through substantial investments in clean energy transportation technologies.

The CRRC wholeheartedly endorses the preliminary objectives and draft areas outlined in the overarching themes of the Concept Paper, especially as it relates to organics management. We see organics as the nexus that touches on every investment goal recommended and we applaud your support in further developing the crucial infrastructure of organics waste management in California.

As you move forward with your recommended investment projects we ask that you continue to engage across all regulatory agencies, as many directly impact the viability of organics management facilities in California. Regulatory achievements and barriers will only become more palpable as additional facilities come on-line. As such, California will need to carefully measure the effectiveness of our regulatory programs in concert with the vital goals of Cap-and-Trade investments. We look forward to working with you during this process.

Sincerely,

Kathryn Lynch  
Regulatory Affairs

Ralph Chandler  
Regulatory Affairs

cc: CRRC State Executive Committee Members