



Air Resources Regulatory Experts

April 23, 2013

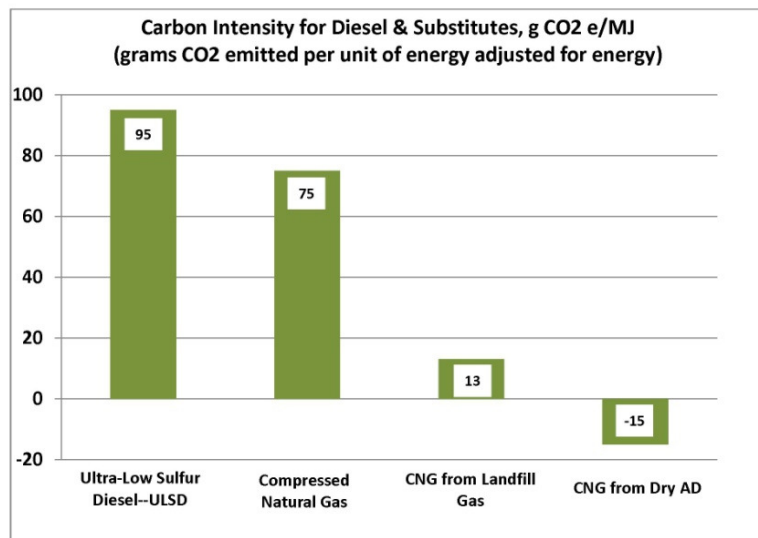
Mary Nichols, Chairman
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Comments on the Cap-and-Trade Auction Proceeds for Fiscal Years 2013-2014 through 2015-2016 and Strong Support for Waste Diversion Investment and Carbon Negative Fuel Investment

Dear Chairman Nichols:

CleanFleets.net is ARB's contractor providing compliance assistance and outreach training in six western states. In that capacity, we have trained over 5,800 fleet owners or operators about ARB's requirements for cleaner fleets. CleanFleets.net offers these comments on the Cap-and-Trade Auction Proceeds Fiscal Years 2013-2014 through 2015-2016. We strongly support the Air Resources Board efforts to invest cap and trade proceeds into programs regarding Natural Resources and Waste Diversion. The diversion of organic waste to bioenergy and composting, and organic waste to anaerobic digestion produces a carbon negative fuel for the clean fleets of tomorrow.

Investing in a carbon negative fleet is a wise choice for California. The Low Carbon Fuel Standard calls for a 10% reduction of the fuel intensity by 2020, where renewable CNG from an anaerobic digestion facility (using dry fermentation of food waste and green waste) has been determined by the ARB to be minus 15 g CO₂e/MJ, or "carbon negative," as shown in the figure below.



Renewable CNG From Anaerobic Digestion Is Carbon Negative

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CalRecycle, in the recently adopted Program Environmental Impact Report for Anaerobic Digestion facilities, has projected the need to develop 70 AD facilities processing 50,000 tons per year, or 210 AD facilities of 20,000 tons per year to meet the AB 32 Scoping Plan requirements. The statewide commercialization of AD facilities in this manner could yield 23.5 million diesel equivalent gallons per year, based upon feedstock consisting of a blend of 2.5 million tons per year of food waste with 1.7 million tons of green waste, or enough fuel for 1,800 CNG-fueled refuse and recycling vehicles. With over 6 million tons of food waste disposed of in 2008, the amount of renewable CNG could double to nearly 50 million diesel equivalent gallons per year, or enough for 3,500 vehicles. The organics collection industry could operate a carbon negative fleet with the deployment of AD technology where the CNG vehicle that collects the organic waste runs on the CNG generated from the organic waste it collects.

CleanFleets.net strongly supports the Air Resources Board efforts to invest cap and trade proceeds into programs regarding Waste Diversion, which the diversion of organic waste organic waste to anaerobic digestion that produces a carbon negative fuel.

Should you have any questions, please contact me at (916) 520-6040.

Sincerely,



Sean Edgar
Director