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

**Re: Comments on First Update to AB 32 Scoping Plan
Carbon Negative Fleets from Anaerobic Digestion in the Waste and
Recycling Sector**

Dear Chair Nichols:

The California Compost Coalition (CCC) is a statewide organization representing facilities processing green waste and food waste materials throughout California including 20 composting facilities and 5 anaerobic digestion projects. CCC members also operate a fleet of hundreds of heavy-duty collection vehicles, and are transitioning from diesel to lower carbon compressed natural gas (CNG) fuel, with plans to make our own carbon negative CNG fuel with the organic waste we collect using anaerobic digestion technologies. CCC supports direct regulation by CARB to prohibit/phase out landfilling of organic materials with the goal of requiring initial compliance action in 2016, with a total phase out by 2020.

CCC supports your vision for the Waste Management Sector and the associated Working Paper 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 by 2020 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 has been busy reducing the direct emissions from our fleets and developing recycling, compost, and anaerobic digestion facilities that are Net-Zero today.

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

- Direct regulation by CARB to prohibit/phase out landfilling of organic wastes with the goal of requiring initial compliance action in 2016.
- Produce carbon negative fuel for the hundreds heavy duty collection trucks that collect organic waste in California
- Develop Net-Zero recycling and composting facilities
- Mandate commercial organic waste collection starting in 2016
- Streamline the permitting of composting and anaerobic digestion facilities

- Support distributed renewable energy from biomass and biomethane development developed from organic wastes
- Utilize “cap-and-trade” revenue to assist in funding the above programs

CCC has provided detailed comments to your staff regarding the CARB/CalRecycle Technical Papers over the last year, which supports the development of a low-carbon system in California today and improve the sustainability of the California infrastructure for tomorrow

The compost industry, in partnership with local government, has been instrumental in our state’s efforts to attain the recycling mandate of 50% waste diversion from landfills, required by the California Integrated Waste Management Act of 1989 (AB 939), and will remain critical to the attainment of future sustainability goals of 75% recycling and the implementation of AB 32. We have been supportive and engaged throughout the AB 32 Scoping Plan development and implementation process.

Biomethane from anaerobic digesters provides renewable electricity, carbon negative fuels, combined heat and power, and renewable natural gas. It significantly reduces methane emissions from landfills and converts those emissions into clean energy and fuel. Biomethane development is important to reduce environmental justice impacts by replacing diesel and other fossil fuels with significantly cleaner, low-carbon fuels. Given the many benefits of biomethane and compost use, we applaud CalRecycle and CARB proposal to invest cap and trade proceeds in anaerobic digestion and compost facility development.

At the nexus of AB 32: Anaerobic digestion and composting are at the nexus of the AB 32 Scoping Plan adopted measures where commercial organic wastes are diverted from landfilling to generate renewable energy and negative carbon fuel, resulting in quality compost that is returned to sustainable agriculture.

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

Sincerely,



Neil Edgar
Executive Director