



October 15, 2013

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

**Re: Comments on 2013 Update to AB 32 Scoping Plan
Carbon Negative Fleets from Anaerobic Digestion in the Waste and Recycling Sector**

Dear Chair Nichols:

The California Refuse Recycling Council (CRRC) is a statewide non-profit trade association comprised of over 120 companies involved in the collection and processing of waste materials that also operate 50 material recovery facilities, 20 composting facilities, 25 construction and demolition debris processing facilities, and over 12 landfills statewide. CRRC members operate a fleet of thousands 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.

CRRC 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. CRRC 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, CRRC has been busy reducing the direct emissions from our fleets and developing recycling and compost facilities that are Net-Zero today.

CRRC 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
- Mandate commercial organic collection and streamline the permitting of composting and anaerobic digestion facilities
- Support distributed renewable energy from biomass and biomethane development
- Utilize "cap-and-trade" revenue to assist in funding the above programs

CRRC has 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

Should you have any questions, please contact me at (916) 444-2772.

Sincerely,

Mark Figone
CRRC-North President

John Snyder
CRRC-South President

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