

## DOCKETED

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*Comment Received From: Scott Beckner*

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## **CalRecycle Comments on the 2018-2019 Investment Plan Update for the ARFVT Program**

Please see attached CalRecycle comments from on the 2018-2019 Investment Plan Update for the ARFVT Program

*Additional submitted attachment is included below.*



## DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

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P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

March 15, 2018

Jacob Orenberg  
California Energy Commission  
Docket Unit  
Re: Docket No. 17-ALT-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

Via Email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**Subject:** Comments on the 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, Docket No. 17-ALT-01

Dear Mr. Orenberg:

CalRecycle appreciates the ongoing collaboration with the California Energy Commission (CEC) to further our common interest to increase the production of sustainable, low carbon transportation fuel. Overall, we support the funding allocation proposed in the draft Investment Plan and laud the CEC Staff for their excellent work. This Plan supports the development of biofuel facilities, which will create markets for organic feedstocks that have traditionally been disposed in landfills. Landfill disposal of organic material is a significant source of methane emissions, a potent short-lived climate pollutant, which must be reduced in order for the State to meet its greenhouse gas reduction goals contained in SB 1383 (Lara, Chapter 395, Statutes of 2016).

Recognizing the importance of diverting organic material away from landfill disposal and into transportation fuel production, CalRecycle recommends revising the following paragraph from page 73 of the draft Investment Plan:

*"The potential of biomethane as a transportation fuel may be limited, however, because of the finite amount that can be produced from waste-based feedstocks. An analysis conducted by the Union of Concerned Scientists suggests that capturing biomethane from all potential sources of organic waste in California may be able to supply roughly 3 percent of the state's demand for natural gas. Given that the supply of this very low-carbon fuel is limited, the associated carbon reduction benefits can be maximized by prioritizing the use of this fuel in applications for which no alternative is available."*



CalRecycle is concerned that this paragraph does not accurately convey the potential of biomethane as a transportation fuel; the cited Union of Concerned Scientist fact sheet also states that biomethane can offset 15 percent of the diesel used in California as a transportation fuel. CEC staff could also consider citing the biomethane estimates contained in the PIER-funded 'An Assessment of Biomass Resources in CA, 2013', conducted by the California Biomass Collaborative. We recommend revising the paragraph to more positively state the potential of biomethane as a transportation fuel; this also would aid the reader in understanding the rationale behind funding allocations contained in the draft Investment Plan.

If you have any questions, please do not hesitate to contact Scott Beckner at (916) 341-6595.

Sincerely,

A handwritten signature in blue ink that reads "Howard Levenson". The signature is fluid and cursive, with the first name "Howard" and last name "Levenson" clearly legible.

Howard Levenson, Ph.D.

Deputy Director, Materials Management and Local Assistance Division

Member, Alternative and Renewable Fuel and Vehicle Technology Program

Investment Plan Advisory Committee