



## DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

801 K STREET, MS 19-01, SACRAMENTO, CALIFORNIA 95814 • (916) 322-4027 • WWW.CALRECYCLE.CA.GOV

**DOCKET****10-ALT-01**DATE May 20 2011RECD. May 20 2011

May 20, 2011

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 10-ALT-1  
1516 Ninth Street  
Sacramento, CA 95814-5512

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

Subject: Draft 2011/2012 AB 118 Investment Plan, Docket No. 10-ALT-1

Dear Commission:

Thank you for the opportunity to participate in the Advisory Committee for the Alternative and Renewable Fuel and Vehicle Technology Program (AB118) Investment Plan. In response to your May 17, 2011 letter, I am writing to provide CalRecycle's comments and recommended changes to the Committee Draft of the AB 118 Investment Plan. These comments build upon and reiterate many of the issues that CalRecycle and CEC staffs have discussed since the release of the Committee Draft earlier this month.

Notably, this plan allocates \$8 million for funding the production of pre-landfill biomethane, which will create green jobs and positively impact California's economy. This allocation complements previous Investment Plans that provided \$ 11 million in funding for landfill biomethane projects and about \$6 million for pre-landfill anaerobic digestion projects. Both pre-landfill and landfill projects utilize waste-based resources to produce low carbon fuel. Biomethane produced from waste-based resources has significant environmental advantages as it avoids some of the sustainability concerns associated with purpose-grown feedstocks, resulting in the lowest carbon intensity of any existing vehicle fuel pathway. Additionally, as noted on page 8 of the Draft Investment Plan, "Anaerobic digestion of waste-based feedstocks is proving to be a robust and cost-effective technology for creating very low carbon transportation fuels that can be readily incorporated into vehicles and fueling systems that can use natural gas." In recognition of this, and to assist in the siting and permitting of anaerobic digestion facilities in California, CalRecycle is developing a Program Environmental Impact Report and associated guidance documents.



Again, thank you for the opportunity to participate in the AB 118 Investment Plan process. I want to reiterate our commitment to continued participation not only in the development but also in the implementation of the 2011/2012 Investment Plan. This continuing collaboration between CEC and CalRecycle will help further our common interest in advancing bioenergy and biofuel production in California. I look forward to the May 23, 2011, meeting to discuss the Committee Draft of the Investment Plan. Specific comments on the Committee Draft of the 2011-2012 AB 118 Investment Plan are contained in the attachment.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, reading "Howard Levenson". The signature is fluid and cursive, with the first name "Howard" and last name "Levenson" clearly distinguishable.

Howard Levenson, Ph.D.

Member of the Alternative and Renewable Fuel and Vehicle Technology Program (AB 118) Investment Plan Advisory Committee

Deputy Director, Materials Management and Local Assistance Division

cc: Mark Leary, Acting Director, CalRecycle  
Sarah Michael, Special Advisor to Vice Chair Boyd

Attachment: Specific Comments on Committee Draft of the 2011-2012 AB 118 Investment Plan

**Attachment:** Specific Comments on the Committee Draft of 2011-2012 AB 118 Investment Plan

The following language modifications are proposed in strikethrough and underlined text.

- 1) Page 75, Table 20 – CalRecycle is in the process of verifying the estimates of feedstock volumes and fuel potentials that are presented in the table and will provide comments directly to CEC staff.
- 2) Page 79, paragraph 2, line 4 “...estimates that 14 ~~tons~~ to 16 million tons of fruits and vegetables are processed every year...”
- 3) Page 82, paragraph 4, line 1 “...it has a ~~gross~~ technical potential of ~~38~~ 16 million BDT per year and a ~~technical potential of 10 million BDT per year.~~”
- 4) Page 82, FootNote # 196 “...has a 65kWh potential while 1 ton of MSW has a 550 kWh potential.”
- 5) Page 83, paragraph 1, line 2 “...CalRecycle staff strongly supports the use of ~~MSW~~ the organic fraction of solid waste as well as post-recycled MSW as a transportation fuel or energy source.”
- 6) Page 115, paragraph 1, line 2 “...CalRecycle’s Strategic Directives further support the diversion of organic matter from the landfills, ~~requiring~~ setting a goal of a 50 percent reduction of organics in the waste stream by 2020...”
- 7) Page 115, paragraph 2, line 2 “...the program has funded nine biomethane projects with more than \$33 million; one third of the funding has gone to landfill gas projects.”
- 8) Page 115, FootNote # 290 “...has a 65kWh potential while one ton of MSW has a 550 kWh potential.”

