

## DOCKETED

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*Comment Received From: Howard Levenson, Ph.D.*

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**Comments on the Revised 2017/2018 ARFVTP Investment Plan, Docket No. 16-ALT-02**

*Additional submitted attachment is included below.*



## DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

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November 7, 2016

Commissioner Janea E. Scott  
Docket Unit  
California Energy Commission  
Docket No. 16-ALT-02  
1516 Ninth Street, MS-4  
Sacramento, CA 95814

Via Email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)**Subject:** Comments on the Revised 2017/2018 ARFVTP Investment Plan, Docket No. 16-ALT-02

Dear Commissioner Scott:

Thank you for your leadership and your staff's work in preparing the 2017/2018 ARFVTP Draft Investment Plan. CalRecycle agrees with the overall recommendation to allocate \$20 million for the biofuel production and supply category. However, CalRecycle strongly recommends that the Plan explicitly limit funding of biomethane production to pre-landfill biomethane production projects.

CalRecycle has raised the issue of prioritizing pre-landfill biomethane in its comments on previous plans, and this has been reflected to some extent in California Energy Commission solicitations and scoring priorities. However, in light of recent legislation, it is now appropriate to limit funding eligibility to pre-landfill biomethane production projects. AB 1826 (Chapter 727, Statutes of 2014), which went into effect this year, requires businesses to recycle their organic waste. SB 1383 (Chapter 395, Statutes of 2016), signed by the Governor in September 2016, focuses on reducing short-lived climate pollutants, such as methane from landfills. It established a target of reducing the statewide disposal of organic waste from 2014 levels by 50 percent by 2020 and 75 percent by 2025, as well as a target of recovering at least 20 percent of edible food currently disposed of by 2025. Achieving these goals necessitates a very significant expansion in non-landfill organics management capacity, in particular of composting and anaerobic digestion facilities.

In light of these significant legislative mandates, CalRecycle recommends that eligibility for future biomethane solicitations be strictly limited to pre-landfill organics projects. Focusing on pre-landfill biomethane will ensure that AB 118 funding gets invested in projects which are likely to produce transportation fuel for many years, with limited risk of becoming a stranded



asset. It also ensures that AB 118 funding does not incentivize continued disposal of organic materials, which is at odds with both AB 1826 and SB 1383.

In summary, the Draft 2017/2018 Investment Plan offers an excellent opportunity for continued progress in transitioning California to low carbon transportation fuels, and CalRecycle looks forward to ongoing collaboration with the Commission in support of the AB 118 program. If you have any questions, please do not hesitate to contact me directly at (916) 341-6311.

Sincerely,



Howard Levenson, Ph.D.

Deputy Director, Materials Management and Local Assistance Division  
and

Member, Alternative and Renewable Fuel and Vehicle Technology Program  
Investment Plan Advisory Committee

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