



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

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March 28, 2011

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

Via Email: docket@energy.state.ca.us

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

DOCKET
10-ALT-1

DATE	MAR 28 2011
RECD.	MAR 28 2011

Dear Jim:

I would like to thank you again for the leadership you are providing on the Investment Plan and for including CalRecycle on the Plan's Advisory Committee. I continue to believe that this collaboration between CEC and CalRecycle will help further our common interest in advancing bioenergy and biofuel production in California. I want to reiterate our commitment to continued participation not only in development, but also implementation, of the 2011/2012 Investment Plan. As currently drafted, this Plan will increase the production of biomethane from waste-based feedstocks.

Specifically, I am pleased to see that this plan allocates \$8 million for funding the production of "pre-landfill" biomethane, which is a key to meeting the AB 118 program's mid-term goal of increasing alternative vehicle fuel supplies. Biomethane produced from waste-based resources has significant environmental advantages as it avoids some of the concerns associated with purpose-grown fuel feedstocks, and it possesses the lowest carbon intensity of any existing vehicle fuel. Additionally, the production of in-state biomethane will create green jobs and positively impact California's economy.

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, as well as working with the California Air Resources Board to develop an anaerobic digestion pathway in the Low-Carbon Fuel Standard program.



Again, thank you for the opportunity to participate in the AB 118 Investment Plan process. We look forward to continuing to work collaboratively with the CEC on the development of grant solicitations and accompanying scoring criteria that will be needed to implement the biomethane portion of Investment Plan.

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

Sincerely,

A handwritten signature in cursive script that reads "Howard Levenson".

Howard Levenson, Ph.D.

Member, Alternative and Renewable Fuel and Vehicle Technology Program (AB118) Investment Plan Advisory Committee

Deputy Director, CalRecycle

Cc: Sarah Michaels, Special Advisor to Vice Chair Boyd, CEC
Mark Leary, CalRecycle