



June 7, 2011

Mr. John Laird, Secretary  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

RE: **CalRecycle Regulatory Determination for the Plasco Salinas Valley Project**

Dear Secretary Laird:

As you know, the California Refuse Recycling Council (CRRC) is a trade association comprised of waste collection, processing and recycling firms operating throughout the state. Our members are committed to the waste diversion objectives of California's landmark recycling measure, AB 939, and are responsible for constructing and operating the network of waste processing facilities that have enabled this state to achieve a waste diversion figure exceeding sixty percent (60%).

It is conservatively estimated that the solid waste industry has invested several hundreds of millions of dollars in recycling program and facility development. Not surprisingly, CRRC members view with caution any legislation, regulation, or administrative determination that they conclude may adversely impact waste diversion and recycling efforts, for they have the most to lose. With that said, CRRC members are also looking forward in an effort to not only sustain and grow existing waste diversion through recycling, but to also find other alternatives to manage that portion of the waste stream which is simply not susceptible to recycling processes. The CRRC and its members are advocates of conversion technologies as landfill alternatives.

We understand that CalRecycling's November 23, 2010 letter on the regulatory status of the proposed Plasco Salinas Valley Project has been the subject of a great deal of interest and

CALIFORNIA REFUSE RECYCLING COUNCIL

Mr. John Laird, Secretary  
California Natural Resources Agency  
June 7, 2011  
Page 2

debate. We write at this time to respectfully urge that the CalRecycle determination be sustained.

As the companies that actually collect and manage the state's solid waste, we recognize that conversion technologies must become a critical part of the overall solid waste management system; these facilities will receive residual waste that is left over after the material has been thoroughly sorted at our facilities and is generally destined for landfill. Facilities such as these will allow this material to be converted into renewable energy and other beneficial products as a viable alternative to burying it in a landfill. We do not believe that California can approach zero waste, or the thirty-three percent (33%) RPS goal, without a significant contribution from this technology.

In short, the CalRecycle finding that the Plasco project meets the definition of gasification, was appropriate. We also support the California Energy Commission's finding, based on the CalRecycle determination, that the project is pre-certified as eligible for the Renewables Portfolio Standard. These rulings are fair, they are correct, and they are sorely needed if we are ever to eliminate our reliance on solid waste landfills.

Very truly yours,



David Fahrion  
President of Southern District  
California Refuse Recycling Council



Ron Fornesi  
President of Northern District  
California Refuse Recycling Council