



June 23, 2020

Liane M. Randolph, Chair
California Air Resource Board
P.O. Box 2815
Sacramento, CA 95814

RE: Board Meeting on June 24, 2021 – Agenda Item 21-5-4: Public Meeting to Hear an Informational Update on the 2022 Scoping Plan Process

Dear Chair Randolph:

The California Compost Coalition (CCC) is a statewide organization representing operators of permitted facilities involved in the collection, hauling, processing, and composting of green and food waste materials throughout California. CCC members collect organic waste at the curb in Class 7 heavy-duty vehicles that have transitioning from diesel to near-zero NOx trucks, using in-state, carbon-negative, renewable natural gas (RNG). After processing organics which are diverted from the landfill to achieve SB 1383 mandates that reduce short lived climate pollutants, CCC members haul the compost, digestate, and wood chips in Class 8 heavy-duty vehicles. CCC members transitioned from diesel to near-zero NOx trucks, using in-state RNG, to support regional markets within the State of California. Our markets include the natural working lands of California, and City and County parks. We are in the wheelhouse of the circular economy now and do not rely on export markets as we build infrastructure and create green jobs in California.

CCC members recognize the importance of reducing short-lived climate pollutants and transitioning from diesel fuel, with a clear focus on near-term goals that need to be modeled for 2030, as well as a focus on the longer-term goals of being carbon neutral by 2045. The Scoping Plan Third Update Workshops were held from May 8-10, 2021. We participated in each workshop where it was apparent that the Scoping Plan Third Update will follow a separate pathway without critical linkage to other programs or audits that are underway. It was clear that biomethane and bioenergy combustion is not part of the long-term solution and will have a limited role in the critical near term. The Scoping Plan Third Update needs to consider the cost metrics of the Legislative Audit and the



Low Carbon Fuel Standard.

The '2021 Annual Report to the Legislature on California Climate Investments Using Cap-and-Trade Auction Proceeds' lists the cost-effectiveness of each program in terms of GHG reduction cost per ton. ZEVs and similar programs that do not include near-zero NOx vehicles cost thousands of dollars per ton, while CalRecycle programs that reduce short-lived climate pollutants are just \$10-\$55 per ton to make compost and carbon negative RNG. The refuse fleet inventory of approximately 15,000 heavy-duty vehicles can easily utilize a probable 119 million gallons of RNG, which is under development through 2024, with an average carbon intensity of negative 100 grams CO₂e/MJ. The Waste Sector offers a carbon-negative, circular economy Net-Zero GHG solution now that does not have to wait until 2045 to be carbon neutral. The Low Carbon Fuel Standard needs to be part of the GHG Inventory for 2030 and 2045.

The State Auditor just released Report 2020-114, 'California Air Resources Board – Improved Program Measurement Would Help California Work More Strategically to Meet Its Climate Change'. There were several key recommendations to meet the 2030 targets. These recommendations (described below) should be woven into the fabric of the Scoping Plan Third Update but according to CARB during their workshops, that will not be the case. Since the Scoping Plan Third Update process will have a Spring 2022 Board update and approval by November 2022, it would be timely and appropriate to do the following:

- (1) Better demonstrate that its incentive programs are as effective as possible in achieving specific socioeconomic benefits. **By February 2022**, CARB should develop a process to define, collect and evaluate data that will translate to metrics showing the socioeconomic benefits that result from each of the incentive programs;
- (2) Provide transparency to the Legislature and other stakeholders, **beginning in 2022**, and using the metrics and data described above. CARB should make funding and design recommendations in its funding plans and annual reports based upon which programs are effective in producing socioeconomic benefits and at what cost; and
- (3) Improve its ability to identify the effectiveness of each of its incentive programs in reducing GHG emissions. **By August 2021** CARB should develop a process to define, collect, and evaluate data on the behavioral changes that result from each of its incentive programs.

With the Board hearing an informational update on the structure, development process, and timeline for the 2022 Scoping Plan Update, staff should be directed to integrate the metrics from the State Auditor's office in modeling 2030 and 2045. We look forward to an open and transparent process that includes the LCFS program, the State Auditors' Report, and the role of biomethane and biomass in reducing short-lived climate pollutants.

Sincerely,



Evan W.R. Edgar, Regulatory Affairs Engineer