July 7, 2016

Mary Nichols, Chair
California Air Resources Board
1001 “I” Street
Sacramento, CA 95814

Re: Comments on 2030 Target Scoping Plan Update Concept Paper

Dear Chair Nichols:

The California Compost Coalition (CCC) is a statewide organization representing operators of permitted facilities involved in the processing and composting of green and food waste materials throughout California. On behalf of these companies, we respectfully submit the following comments on the 2030 Target Scoping Plan Update Concept Paper. We are in strong support in setting 2030 goals that would implement the Five Pillars.

Composting and anaerobic digestion is the glue that binds the Pillars together. Eliminating organics from the landfills will mitigate methane generation as a short-lived climate pollutant (Pillar 4), and instead, create biomethane power at anaerobic digestion facilities to generate more renewable energy (Pillar 2) and carbon negative fuel for the CNG fleet that collects the organics and implements the Low Carbon Fuel Standard (Pillar 1) to displace diesel. The diverted food waste and digestate can be composted to sequester carbon and promote healthy soils (Pillar 5). Organic power has been deemed the most cost-effective GHG reduction strategy that bonds all Five Pillars together. The California Legislative Analyst’s Office determined the cost of composting and anaerobic digestion to be at just $9/ton of GHG reduction while the overall average is $57/ton.

Rethinking Methane has been part of our thought process for years. Our companies would harness the biomethane at their anaerobic digestion facilities and place the renewable natural gas back in the same CNG truck that had collected the organic waste. Instead of driving to the landfill that can generate fugitive methane for over 30 years, CCC members can produce RNG in 30 days. With the ultra-low NOx engines being deployed this year, our members can have immediate impacts on reducing short-lived climate pollutants and displacing diesel fuel in our fleets.
CCC shares the vision to set 2030 Targets and develop a sustained funding mechanism to provide incentives to develop the infrastructure for a low-carbon system in California and improve the sustainability of the California infrastructure. Without 2030 targets coupled with incentives, the regulatory certainty will wane and many projects underway will falter. We need these policy drivers fortified with incentives to develop this multi-billion dollar low carbon future for the solid waste and recycling industry,

CCC has previously provided detailed comments to your staff regarding the CARB/CalRecycle Technical Papers for the 2014 Update, which support the development of a low-carbon system in California today to improve the sustainability of the California infrastructure for tomorrow.

We appreciate the opportunity to comment on these regulatory concepts and look forward to working with you through the completion of this rulemaking process.

Should you have any questions, please contact me at (916) 739-1200.

Sincerely,

Neil S.R. Edgar
Executive Director
Governor Brown’s
FIVE PILLARS

- Convert Organics to Carbon Negative Fuel
- 50% LESS OIL by 2030
- 50% RPS RENEWABLE ENERGY by 2030
- DOUBLE ENERGY EFFICIENCY by 2030
- 90% ORGANICS RECYCLING by 2025
- 15 MILLION TONS OF COMPOST USE by 2025

- Low Carbon Fuel Standard
- Renewable Portfolio Standard
- LEED Certification
- Mitigate Methane
- Healthy Soils Initiative

- 10% LESS CARBON INTENSITY by 2020
- 23% RPS RENEWABLE ENERGY by 2020
- 3 MILLION METRIC TONS GHG REDUCTIONS by 2020
- 50% ORGANICS RECYCLING by 2020
- 7.5 MILLION TONS OF COMPOST USE by 2020

2015 - Executive Order B-30-15, SB 350, SB 32
2006 - California Global Warming Solutions Act - AB 32