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Upper Valley Recycling

Zanker Road Resource Management

Z-Best Compost Facility

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.

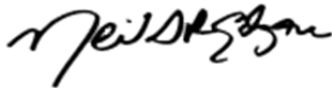
CCC shares the vision to set 2030 Targets and develop a sustained funding mechanism to provide incentives to develop the infrastructure for a low-carbon system in California and improve the sustainability of the California infrastructure. Without 2030 targets coupled with incentives, the regulatory certainty 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,

A handwritten signature in black ink, appearing to read "Neil S.R. Edgar". The signature is fluid and cursive, with the first name "Neil" being the most prominent.

Neil S.R. Edgar
Executive Director



40 % GHG Reduction below 1990
by 2030

Governor Brown's

FIVE PILLARS

50% LESS OIL
by 2030

Convert Organics to Carbon Negative Fuel

Low Carbon Fuel Standard



LCFS

10% LESS CARBON INTENSITY
by 2020

50% RPS RENEWABLE ENERGY
by 2030

NET ZERO



Renewable Portfolio Standard



RPS

33% RPS RENEWABLE ENERGY
by 2020

DOUBLE ENERGY EFFICIENCY
by 2030

Decarbonize Economy

LEED Certification



Cal-Green

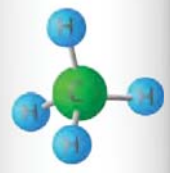
3 MILLION METRIC TONS GHG REDUCTIONS
by 2020

90% ORGANICS RECYCLING
by 2025

MITIGATE METHANE



Reduce Short-Lived Climate Pollutants



SLCP

50% ORGANICS RECYCLING
by 2020

15 MILLION TONS OF COMPOST USE
by 2025

Sequester Carbon into Soil

Healthy Soils Initiative



HSI

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

