



# CALIFORNIA COMPOST COALITION

September 3, 2021

Ms. Rajinder Sahota, Deputy Director  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Comments on Short-Lived Climate Pollutants in the 2022 Climate Change Scoping Plan

Dear Ms. Sahota,

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 transitioned 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 meet 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 and 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.

In order to bend the climate curve over the next decade, methane needs to be mitigated with a strategy to produce RNG as a carbon negative transportation fuel. The role of RNG as a transportation fuel needs to be modeled out to year 2030 and 2045, as the Waste Sector has the most elegant solution to mitigate greenhouse gasses, by collecting and transforming food waste and green waste into RNG fuel and placing it back into the same collection vehicle. There needs to be a model that allows the Waste Sector to continue to use RNG for the next 13 to 18 years, as fleet owners purchase new CNG vehicles with near-zero NOx with the use of in-state RNG. SB 1 allows fleet owners that purchase new vehicles to use them for their useful term. Anaerobic Digestion facilities produce RNG has a capital recovery period of 20 years. SB 1383 regulations require local government to purchase organic products such as RNG for their fleets.



CCC urges CARB, therefore, to prioritize SLCP reductions in scenarios planning and all other parts of the 2022 Climate Change Scoping Plan. To focus more on methane reductions – as the last lever we have left to avoid catastrophic climate change – CARB should make SLCP Reductions the first and highest focus of the 2022 Climate Change Scoping Plan.

The role of RNG as a transportation fuel needs to be modeled to 2030 and 2045 as the Waste Sector is making significant investments in CNG fleets and anaerobic digestion facilities that will produce in-state RNG for their near-zero NOx CNG fleets.

Should you have any questions, please contact me at (916) 444-5345.

Sincerely,

A handwritten signature in black ink, appearing to read "Evan W.R. Edgar". The signature is written in a cursive, somewhat stylized font.

Evan W.R. Edgar  
Regulatory Affairs Engineer