



July 9, 2021

The Honorable Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Public Workshop Series to Commence Development of the 2022 Scoping Plan Update

Dear Chair Randolph,

On behalf of the Resource Recovery Coalition of California (Resource Coalition), we appreciate the opportunity to comment on the development of the 2022 Scoping Plan Update. Our members provide critical waste and recycling services throughout California and have led the state in recycling and organic material management innovation. Since the Board approved the first Scoping Plan in 2008, the Resource Coalition has been engaged in its development, especially as it pertains to organic material management. We provide these preliminary comments and recommendations as we work in concert to achieve carbon neutrality by 2045.

Policy Background

The passage of AB 32 (Nuñez, 2006), the California Global Warming Solutions Act of 2006, affirmed California's commitment to reducing greenhouse (GHG) emissions, and set the stage for the California Air Resources Board (CARB) to regularly update a Scoping Plan to achieve our emission reduction goals.

A number of subsequent bills, including SB 605 (Lara, 2014), SB 32 (Pavley, 2016) and SB 1383 (Lara, 2016) served to codify CARB GHG reduction recommendations addressed through the Scoping Plan process. Notably, CARB identified that short-lived climate pollutants (SLCP), which include methane, black carbon and fluorinated gases, have an outsized impact on climate change in the near term, and that the science unequivocally underscores the need to immediately reduce these emissions.¹

One immediate and critical action identified to reduce California methane emissions is to divert organic waste from landfills. The phasing in of organic waste disposal reduction programs will

¹ California Air Resources Board (CARB), Short-Lived Climate Pollution Reduction Strategy, Sacramento, March 2017, <https://ww2.arb.ca.gov/resources/documents/final-short-lived-climate-pollutant-reduction-strategy-march-2017>



reduce approximately 85-90 MMTCO₂e of emissions by 2030.² Realizing this significant GHG reduction will require substantial infrastructure capacity to divert and recycle our organic waste material, and this development needs to be part of the Scoping Plan strategy.

Scoping Plan Recommendation – Focus on SLCP Reductions

Because of near immediate climate benefits, the reduction of SLCP emissions must be a priority focus of the developing plan. For the waste and recycling sector, this means diverting organic material away from landfills into more beneficial uses, such as renewable energy production and composting.

California must develop a long-term strategy to efficiently divert organic waste from the landfill that addresses the cost and regional regulatory limitations of organics management, including a strategy for biogas and compost use. Ultimately, we need cross-agency agreement on the immediate, midterm and long-term approach to mitigating our organic waste. The strategy should include goals for local organic waste management development that support a circular economy framework. In other words, the strategy should bolster local resilience and put organic waste to beneficial use within the local community.

One of the greatest opportunities and challenges we face is utilizing biomass, such as organic waste, for renewable energy production. Today, fuels produced from select organic waste material are actually carbon negative, supporting our long-term goal of carbon neutrality. When coupled with low NO_x truck vehicle use, these fuels provide immediate benefits and slash emissions that would otherwise occur if the material were landfilled and the trucks were diesel fueled. And, while we strongly support the development of zero emission vehicle use in the heavy-duty sector, we understand that this technology is not yet viable and cannot 1:1 replace the performance of a traditional internal combustion engine truck. We continue to work with CARB staff on the Advanced Clean Fleet regulations and encourage the Scoping Plan to address the near-term development of bioenergy that can support this transition.

As supported by other stakeholders, bioenergy must be a component of the electricity sector plan and the Scoping Plan must address the long-term viability of biogas use in California. Not only does this development directly support SLCP reductions, it sustains resource diversity and reliable power from a firm, renewable power source. Simply put, we cannot rely on only wind and solar for our reliable energy grid, or can we ignore the emission reduction benefits of harnessing organic waste for renewable energy production and use.

² California's Climate Strategy: Waste Sector Goals (4/18/2019), <https://www2.calrecycle.ca.gov/Publications/Download/1436>



Conclusion

We look forward to working with CARB as the development of the 2022 Scoping Plan progresses. We believe that organic management will play a critical role in meeting our carbon neutrality goals and appreciate the continued work of CARB staff to address this.

Sincerely,

A handwritten signature in black ink that reads "Veronica Pardo". The signature is written in a cursive, flowing style.

Veronica Pardo
Regulatory Affairs Director
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