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COMPOST COALITION

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

Re: Comments on 2030 Target Scoping Plan Update

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 have the following comments on the 2030 Scoping Plan Update

1. **"Waste and Recycling Sector' - Increase from 7 MMTCO2e to 9 MMTCO2e by 2030**

We plan to work with your staff on the following issues to understand the metrics and modeling to support the increase in the 'Waste and Recycling' Sector. Is this methane increase from landfills, or are other aspects of recycling such as remanufacturing of recyclable materials (which is in the industrial sector), or the hauling of recyclables (which should be in the transportation sector), or the composting of organics?

2. **Rename the "Waste and Recycling Sector" to the "Landfill Sector"**

As testified at the 2014 Scoping Plan Update, there should be no Waste Sector by 2030. The 'solid waste and recycling' industry collects and hauls waste and materials and those emissions are included in the transportation sector. The industry is the energy sector making our own biogenic power from biomass and biomethane, solar and fuel cells. The industry is in the agricultural sector making compost and sequestering compost into healthy soils while mitigating drought with compost use. The industry is in the residential and commercial sectors delivering LEED points with recycling of building material and supplying mulches and compost.

What emissions are included in the 'Recycling Sector" that are not already part of the other sectors noted? Recycling is ubiquitous across all sectors, where waste is placed in the landfill. This sector should be called the 'Landfill Sector' as to not misconstrue recycling with landfilling, but as an alternative to landfilling.

3. **Working Lands Acres and Increased Compost Use**

The Compost Coalition would like to clarify the intent of the Scoping Plan language for croplands and rangelands. According to the below excerpt from the table in the working lands presentation, the expectation is that an incremental 10,000 acres each year, both for croplands and rangelands, would be adopting sustainable agriculture practices, adding a total of 260,000 acres by 2030.

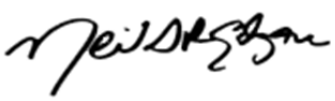
Croplands	compost, cover crop, no-till	10,000 acres/year treated through 2030
Rangelands		10,000 acres/year treated through 2030

According to CDFA, there are roughly 9 million acres of irrigated farmland, so the 130,000 acres would represent only a 1.5% increase. According to UC Rangelands at UC Davis, there are 62.9 million acres of rangeland; pushing for another 130,000 acres would mean only a 0.2%. increase. Neither could be classified as aggressive targets, where agriculture could use all of the compost derived from organics recycling mandated by SB 1383 to mitigate methane, given more robust market development targets.

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