



June 12, 2015

California Environmental Protection Agency
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comment Letter on Short-Lived Climate Pollutant Reduction Strategy

The California Refuse Recycling Council (CRRC) is a trade association of haulers, processors, recyclers, and composters with members throughout the State of California. CRRC regulatory staff attended CARB's May 27, 2015 workshop on the Short-Lived Climate Pollutant Reduction Strategy and offered comments, specifically regarding the role of organics diversion and technology development such as biofuels, biochar, bioenergy, and other technologies.

CRRC members have been engaged in organics processing, composting, and anaerobic digestion for decades and support California policy initiatives promoting these areas. Several legislative and regulatory programs are concurrently being advanced with the goal of diverting a significant portion of organics from landfill disposal. These initiatives include: AB 1826 (Chesbro), which calls for mandatory commercial recycling of organics, AB 1594 (Williams), which brings an end to green waste alternative daily cover (ADC) qualifying as diversion in 2020, and the finalization of the State Water Resources Control Board (SWCRB) compost order and CalRecycle's Title 14 and 27 compost regulations. Additionally, the State is managing the Cap-and-Trade program and funding allocations, a key element of the AB 32 (California Global Warming Solutions Act of 2006) Scoping Plan.

As these programs develop, it remains critical for the Air Resources Board to harmonize organic diversion goals in concert with these programs. Given the current regulatory and legislative landscape, a successful framework for organics can only be achieved through consistent coordination and consideration between agencies charged with implementing these programs. Additionally, this must be coupled with enhanced financial incentives to build the necessary infrastructure. Without cross-agency coordination, collaboration, and financial support, we will not have the means to attain our statewide greenhouse reduction and diversion goals.

The CRRC appreciates CARB's recognition that "state incentives or funding for organic infrastructure" is necessary to meet State diversion goals. We encourage CARB to reinforce this crucial message to the California Legislature and other decision-makers as they consider

allocation of funding and incentives. Without robust infrastructure development, organics diverted from the landfill will have limited outlets and may lead to unintended mismanagement of material. We ask that your Short-Lived Climate Pollutant Strategy fully address the aforementioned legislative, regulatory and financial complexities as we move toward achieving an improved organics management infrastructure in the State of California.

Finally, the waste sector remains a critical stakeholder in achieving strategies to develop a vital organics infrastructure and divert organics from the landfill, as well as developing strong markets for materials, working with our agricultural partners in developing healthy soils, developing renewable energy technologies and, of primary consideration, reducing greenhouse gas emissions. These goals can only be accomplished through an integrated strategy. CRRC members continue to work at the state and local level in supporting these initiatives and are eager to work alongside you in developing the strategy for our sector.

We thank you for your time and efforts in the crucial initiative of reducing short-lived climate pollutants.

Sincerely,



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