



The Honorable Liane M. Randolph
Chair, California Air Resources Board
P.O. Box 2815
Sacramento, CA 95814

Re: CR&R Environmental Services comments on the California Air Resources Board's 2022 Scoping Plan Workshop on August 17th

Dear Chair Randolph,

On behalf of CR&R Environmental Services (CR&R), we appreciate the opportunity to comment on the 2022 Scoping Plan Update (Scoping Plan) to create a comprehensive, multi-year program to reduce greenhouse gas emissions (GHG) across the state. As detailed below, we urge the California Air Resources Board (CARB) to include in its Scoping Plan a comprehensive roadmap to carbon neutrality that supports and achieves the state's Short-Lived Climate Pollutants (SLCP) reduction targets.

Founded in 1963, CR&R is a Southern California-based waste and recycling collection company, serving more than 3 million people and over 25,000 businesses through Orange, Los Angeles, San Bernardino, Imperial, and Riverside counties. We are contracted with approximately 53 cities and counties to provide waste and recycling services to support compliance with state laws. The services we provide are critical for meeting the organics recycling compliance requirements of SB 1383 (Lara, 2016).

Thanks to groundbreaking technologies and pioneering reclamation programs, we recycle over 500,000 tons of materials each year, creating cleaner communities, reducing air and water pollution, conserving landfill space, and preserving our natural resources. Our value is driven by our understanding that each community is unique, and our business model reflects the evolving demands for greater environmental protection.

Based on state regulations and laws enacted over the last two decades, we have embarked on partnerships with over 20 cities to invest \$232 million, in private and public funds, to make the goals of these laws a reality. We are building the foundation to meet the state's SLCP goals.

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To that end, we have built one of North America's largest and most advanced high solids anaerobic digestion (AD) facility, which has the capacity to recycle 335,000 tons of organic waste in just a six-acre footprint. Our AD system is a closed loop system that processes the organic waste collected by our trucks and creates a renewable, GHG-neutral fuel used in the same trucks. Our projections show that our facility has an annual production of over four million gallons of renewable natural gas (RNG) to fuel our entire fleet, and the ability to compost 260,000 tons of organic compost. Through this, we achieve greenhouse gas reduction of over 961,000 metric tons annually. This is the equivalent of over 204,000 passenger vehicles on the road.

The state must invest in long-term funding to achieve its SLCP-reduction goals

Organic waste, such as food and green waste, has long been recognized as a primary source of methane emissions in the state and accounts for 22 percent of methane emissions. In 2016, the Legislature passed SB 1383 (Lara), mandating not only that the state reduce methane emissions 40 percent below 2013 levels by 2030, but that it must also divert 75 percent of organic waste from landfills by 2025 to support that goal.

CalRecycle has determined that to achieve the state's organic waste diversion target, it must recycle an additional 20-25 million tons per year and will cost \$20 billion to implement over ten years. Building the proper capacity to handle this much waste is no small task, with AD being one of the most viable options.

To manage and recycle the organic waste expected to be collected under the SB 1383 regulations, the state needs 50 to 100 new or expanded organic waste recycling facilities. **Therefore, we support the state allocating long-term funding to build and expand organic waste recycling infrastructure across the state.** These new and expanded facilities are a vital part of California's recycling infrastructure and will benefit communities by reducing greenhouse gases, offering new green collar jobs, and improving public health and the environment.

We urge CARB to align its SLCP and clean transportation targets

SB 1383 regulations require local governments to procure various organic waste products, including RNG. The state's investments in anaerobic digestion allows facilities to effectively capture methane emissions from organic waste and reuse it as a transportation fuel. Recycling this fuel further displaces criteria pollutants and GHGs from diesel-powered trucks. In many cases, the carbon intensity of this fuel is negative.

CR&R is very supportive of the state's long-term electrification goals as part of our coordinated efforts to reduce GHGs and air pollutants. **If the state decides to rapidly electrify all sectors of the transportation sector, the state's organic waste product procurement goals will conflict with the state's vehicle electrification policies.** This creates uncertainty for investment in organic waste infrastructure and has the unintended consequence of reducing current cost-effective markets for RNG.

As the state moves towards zero-emission transportation operations, it is important to align policies and funding with existing climate goals and regulations. While we understand and support the state's vision of a zero-emission transportation system, we also understand the critical role that RNG plays in the state's transition away from high carbon emitting sources.

It is clear that the market for medium- and heavy-duty zero-emission vehicles has not hit critical mass needed to achieve widespread commercial readiness before the 2030 deadline established by SB 32. In order to accomplish the state goals of both reducing carbon emissions from the transportation sector and achieving SLCP reduction goals, the state must consider the role that low-NOx heavy-duty vehicles play in specific sectors and industries. In limited use cases, such as with waste or refuse trucks, the state can benefit from the emission reduction associated with low NOx vehicles versus their diesel counterparts. Additionally, by incorporating a closed loop system, localities will benefit from the added support in achieving SB 1383 procurement goals, while also receiving air-quality benefits in their communities.

Given the complexity of achieving our climate goals, we believe the state should continue to fund these hard-to-electrify sectors and industries. These vehicles can provide a valuable emissions reduction benefit that would not otherwise occur, but they need supportive fueling policies to realize these benefits.

We thank CARB for its work on this Scoping Plan Update and for the opportunity to comment. We look forward to continued engagement with CARB in the State's efforts to address air quality and climate change challenges.

Sincerely,

Paul Relis
Senior Vice President

Cc: Chair and Members, California Air Resources Board
Ms. Dee Dee Myers, Senior Advisor and Director, California Governor's Office of Business & Economic Development
Cabinet Secretary, Office of the Governor