



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 Draft 2022 Scoping Plan

Dear Chair Randolph,

On behalf of CR&R Environmental Services (CR&R), we appreciate the opportunity to comment on the Draft 2022 Scoping Plan (Draft Scoping Plan) to create a comprehensive, multi-year program to reduce greenhouse gas emissions (GHGs) 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. CR&R's comments on the Draft 2022 Scoping Plan focus on the following issues within the SLCP section:

- 1. We strongly support CARB's recommended strategy of maximizing existing waste infrastructure, in addition to investing in new facilities. We particularly support state investments for building out capacity at anaerobic digestion (AD) and compost facilities.**
- 2. We support CARB's recommended strategy of expanding markets for organic waste products. This must include supporting markets for in-state renewable natural gas as a critical part of a closed-loop circular economy.**
- 3. We support the recovery of edible food as critical to combating food insecurity.**
- 4. Overall, we urge CARB to create a long-term plan that gives waste haulers and AD facility operators market certainty for the end uses of in-state renewable natural gas from organic waste.**

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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. We operate one of the largest AD facilities in North America, and the services we provide are critical for meeting the organics recycling and short-lived climate pollutant reduction requirements of SB 1383 (Lara, 2016).

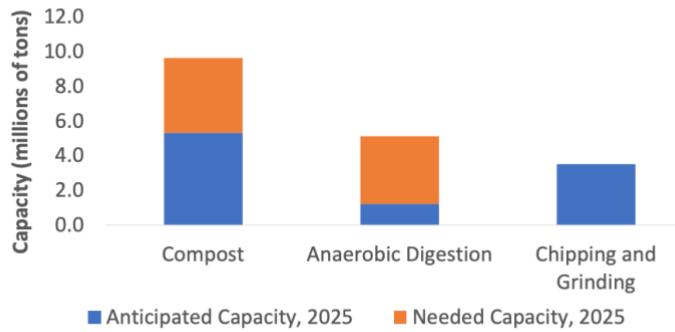
Please see our specific comments below:

- 1. We strongly support CARB's recommended strategy of maximizing existing waste infrastructure, in addition to investing in new facilities. We particularly support state investments for building out capacity at anaerobic digestion (AD) and compost facilities.**

As highlighted in the Draft Scoping Plan, the state will need to substantially build out composting and AD capacity by approximately 8 million tons to achieve its 2025 organic waste diversion requirements. We greatly appreciate CARB recognizing in their Draft Scoping Plan that the state must invest in maximizing and expanding capacity at existing facilities to ensure both cost-effective investments and an expeditious expansion of organics processing capacity.

In their [SB 1383 Infrastructure and Market Analysis Report](#), CalRecycle acknowledges that while there are regulatory barriers to build and expand any facility, "historically it has been easier to expand existing facilities than it has been to start brand new ones." The state only has a few years to double its compost and AD capacity (see below), therefore for both time-savings and financial purposes, expanding existing AD and compost facilities must be part of the solution.

Illustration of Waste Sector Outlook



- 2. We support CARB's recommended strategy of expanding markets for organic waste products. This must include supporting markets for**

in-state renewable natural gas as a critical part of a closed-loop circular economy.

CR&R's AD facility is a closed loop system that processes 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 help local jurisdictions achieve their SB 1383 procurement requirements, and we achieve GHG emission reductions of over 961,000 metric tons annually. This is the equivalent of over 204,000 passenger vehicles on the road.

By January 2022 and beyond, SB 1383 requires local jurisdictions to procure organic waste products, including renewable natural gas, and one of the highest and best uses of this procured gas over the next couple of decades is to replace diesel trucks.

CR&R is very supportive of the state's long-term electrification goals as part of our coordinated efforts to reduce GHG emissions and air pollutants; however, in the near-term using RNG to fuel our refuse trucks as an alternative to diesel drastically reduces our vehicles' contributions to air pollution in the South Coast Air District, one of the most polluted air districts in the country. The Scoping Plan should continue to support and align both the state's organic waste product procurement goals and the state's vehicle electrification policies to reduce SLCP emissions as fast as possible. Using RNG in place of our diesel solid waste fleets reduces SLCP emissions both from organic waste and from diesel, so our organics recycling closed loop is a double win for the climate and air quality.

3. We support the recovery of edible food as critical to combating food insecurity.

Californians throw away nearly 6 million tons of food scraps or food waste each year and this represents about 18 percent of all the material that goes to landfills. The waste management hierarchy – reduce, reuse, recycle – emphasizes reducing the amount of food scraps and food waste at the source, before it reaches CR&R's facility.

We appreciate the Draft Scoping Plan including the importance of food recovery, and we support California collecting edible food that would otherwise go to waste and redistributing it to feed people in need. This is the highest and best use for food that would otherwise go to waste. Feeding hungry people through food recovery is the best use for surplus food and a vital way for California to conserve resources and reduce waste thrown in landfills.

4. Overall, we urge CARB to create a long-term plan that gives waste haulers and AD facility operators market certainty for the end uses of in-state renewable natural gas from organic waste.

CARB's Draft Scoping Plan emphasizes the importance of maximizing and investing in AD facilities, such as CR&R's. While we appreciate this, we also feel that the state of California is sending AD operations and waste haulers extremely mixed signals. On one hand, the state is applauding investments in organic waste processing facilities, as well as investing the state's own dollars in expanding and creating new facilities. We cannot achieve our SLCP goals and requirements without these investments.

However, on the other hand, the state is simultaneously removing the only current cost-effective, viable markets for the products of these facilities, particularly in-state RNG. As highlighted earlier, CR&R's AD facility is a closed loop system that processes organic waste collected by our trucks and creates a renewable fuel used in the same trucks. If the Advanced Clean Fleet (ACF) rule passes in its current form, CR&R would need to start transitioning away from these vehicles.

Given that the transportation sector is the only currently viable market for in-state RNG, the state is removing market incentives for investments in new and expanded organic waste processing facilities. We strongly urge CARB to not only consider providing the refuse industry a pathway to continue to operate this successful, closed loop system by allowing RNG solid waste fleets to continue to operate, but we also request that CARB plan long-term for viable end-uses of this RNG as the state looks to electrify its transportation sector. Without this market clarity, there is no incentive for investments in and continued operations of the organic waste processing sector. CR&R would greatly appreciate the opportunity to work collaboratively with CARB to figure out what this future looks like.

Sincerely,

John McNamara
Vice President of Environmental Compliance