



CALIFORNIA COMPOST COALITION

September 3, 2021

Ms. Rajinder Sahota, Deputy Director
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on 2022 Climate Change Scoping Plan Scenarios

Dear Ms. Sahota,

The California Compost Coalition (CCC) is a statewide organization representing operators of permitted facilities involved in the collection, hauling, processing, and composting of green and food waste materials throughout California. CCC members collect organic waste at the curb in Class 7 heavy-duty vehicles that have transitioning from diesel to near-zero NOx trucks, using in-state, carbon-negative, renewable natural gas (RNG). After processing organics which are diverted from the landfill to achieve SB 1383 mandates that reduce short lived climate pollutants, CCC members haul the compost, digestate, and wood chips in Class 8 heavy-duty vehicles. CCC members transitioned from diesel to near-zero NOx trucks, using in-state RNG, to support regional markets within the State of California. Our markets include the natural working lands of California, and City and County parks. We are in the wheelhouse of the circular economy now and do not rely on export markets as we build infrastructure and create green jobs in California.

The Scenarios Should Focus Much More on SLCP Reductions and Near-Term Opportunities to Benefit the Climate.

CCC members recognize the importance of reducing short-lived climate pollutants and transitioning from diesel fuel, with a clear focus on near-term goals that need to be modeled for 2030 goals with the metrics of current programs, as well as being carbon neutral by 2035 and 2045. To focus more on SLCP reductions – as the last lever we have left to avoid catastrophic climate change – CARB should make SLCP Reductions the first and highest focus of the Scenarios generally and within each sector scenario, as well as all other sections of the 2022 climate Change Scoping Plan. When modeling, CARB should also use the cost metrics from the 2021 Climate Change Investments Annual Report where investing in renewable natural gas production facilities costs the state just \$55/ton and while mitigating methane emissions at landfills.



Drop questions about the highest and best use of organic waste in 2045 or 2050.

For climate change purposes, it is far more critical to begin reducing SLCP reductions right away than to waste more years worrying about what the highest and best use of organic waste or biomethane will be decades from now. The highest and best use of organics waste is to divert it from landfills by at least 75% by 2025 and make organic compost and RNG.

The waste industry collects organic waste in the Class 7 CNG truck and delivered the waste to anaerobic digestion facility to produce compost and RNG, where the RNG goes right back into the same CNG truck that collected it. This is a carbon-negative system and produce in-state RNG for a local circular economy. The solid waste industry has a fleet of 15,000 heavy-duty vehicles statewide, where almost half are off diesel with a steady transition towards CNG with near-zero NOx engines. According to a GNA Report, there are 160 anerobic digestion facilities under development which can produce 119 million dge per year by 2025, with an average carbon intensity on minus 100. This would be enough RNG to fuel the entire refuse fleet.

The answer of the highest and best use of organic waste is happening today, now, with the best cost-effective GHG metrics with proven technologies.

The Scenarios Should Identify Opportunities for Carbon Negative Emissions

We are with the Bioenergy Association of California, that the scenarios do not pose any questions in the sector specific presentations about opportunities to achieve carbon negative emissions. This is a significant omission, especially in the transportation sector can achieve negative emissions. According to Lawrence Livermore National Lab and other experts who've considered how to achieve carbon neutrality, achieving carbon neutrality will require a significant investment in negative carbon emissions. Since the science and state policy call for carbon neutrality by mid-century or sooner, it is critical to consider where California can achieve carbon negative emissions to balance out the emissions that cannot be avoided.

Sincerely,



Evan W.R. Edgar
Regulatory Affairs Engineer

