



September 20, 2021

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 September 8 on Short-Lived Climate Pollutants**

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 (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 September 8 workshop focus on the following issues:

- **The state should invest in building out capacity at existing anaerobic digestion (AD) and compost facilities, in addition to building new facilities.**
- **The Scoping Plan should continue to support the use of in-state renewable natural gas as a critical part of a closed-loop circular economy.**

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 throughout 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 organic waste anaerobic digester (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).

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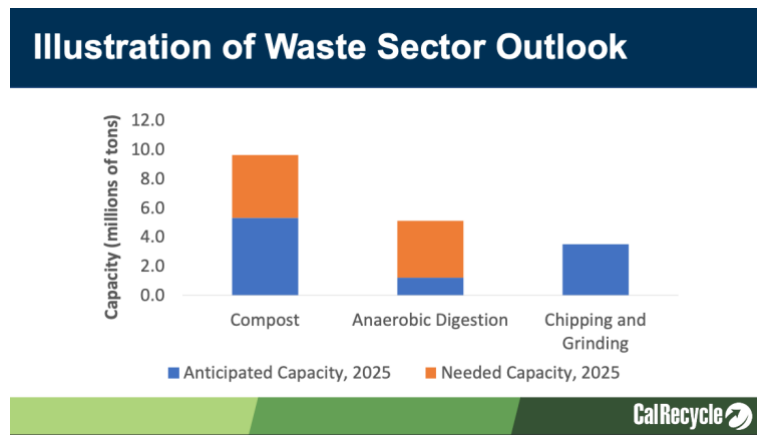
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Please see our specific comments below:

**1. The state should invest in building out capacity at existing AD and compost facilities, in addition to building new facilities.**

As highlighted during CalRecycle’s presentation, the state will need to substantially build out composting and AD capacity by approximately 8 million tons annually to achieve its 2025 organic waste diversion requirements. While CARB recognized in their opening slides the need to “fund build-out of new compost and AD facilities,” the state must also invest in 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 facilities must be part of the solution.



Recommendation: As part of the mechanism pathways for reducing methane emissions, include investing in existing facilities to expand capacity, in addition to building new facilities.

- **The Scoping Plan should continue to support the use of 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 two 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 removing over 204,000 passenger vehicles from the road.

By January 2022 and beyond, SB 1383 requires local jurisdictions to procure organic waste products, including RNG, 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 short-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 diesel 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.

Recommendation: Support an organic recycling closed loop system by incentivizing and allowing near-zero emission trucks that run on in-state RNG until a commercially viable and cost-effective zero emission vehicle is available in the equivalent vehicle class.

Sincerely,

Paul Relis  
Senior Vice President, Director of Environmental Affairs

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