

March 29, 2024

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Support for CalRecycle's Climate Pollution Reduction Grants Program Application

Dear Administrator Regan:

The California Air Resources Board (CARB) expresses strong support for the Department of Resources Recycling and Recovery's (CalRecycle) implementation grant application under the U.S. Environmental Protection Agency's (EPA) Climate Pollution Reduction Grants (CPRG) Program.

Staff and leadership from CARB have worked closely with CalRecycle coordinating and accelerating the state's efforts to fight climate change and meet the statutory requirement of SB 1383¹ to reduce short-lived climate pollutants 40 percent by 2030. Codifying the law, CARB developed the Short-Lived Climate Pollutant Strategy² leading to a series of regulations³ by CalRecycle related to organic waste reductions. CalRecycle also issued rules and timelines for AB 1826,⁴ which sets a goal of 75% organic waste diversion, and requires businesses to recycle their organic waste and local jurisdictions to implement organic waste recycling programs.

This application would enhance organics recycling infrastructure to divert more green materials, food materials, or alternative daily cover from landfills, thereby reducing methane emissions and improving air and water quality. This measure would support composting, co-digestion, and anaerobic digestion projects, along with emerging, non-combustion biomass conversion technologies.

Over a 20-year period methane is 80 times as potent as carbon dioxide at trapping heat in the atmosphere. Reducing methane emissions is therefore one of the best investments we can make to fight climate change now and produce benefits in the near future, and reducing organic and food waste that ends up in landfills is one of the most effective approaches to cutting methane.

¹ 2016. California Legislative Information. SB 1383. September 19.
https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB1383

² 2017. CARB: Short-Lived Climate Pollutant Strategy. March. https://www2.arb.ca.gov/sites/default/files/2020-07/final_SLCP_strategy.pdf

³ 2020. CalRecycle: Short-lived Climate Pollutants (SLCP): Organic Waste Reductions Final Regulation Text. November.
<https://www2.calrecycle.ca.gov/Docs/Web/118371>

⁴ Legiscan. 2014. AB 1826. August 11. <https://legiscan.com/CA/text/AB1826/id/1042561>

Under CalRecycle, California's cities and other jurisdictions have begun programs to limit organic and food waste from going to landfills. According to the SB 1383 Infrastructure and Market Analysis study,⁵ however, full implementation of SB 1383 and the Short-Lived Climate Pollutant Reduction Strategy requires diverting an additional 12 to 14 million tons of organic waste from landfills to avoid methane emissions. CalRecycle's analysis in 2020 anticipates an organic recycling capacity shortfall of about eight million tons by 2025, highlighting the urgency of investing in organics recycling infrastructure.

Funding received for this application will address this gap and will also leverage increased private sector investment for emerging, non-combustion biomass conversion technologies. Developing these emerging technologies will enable other jurisdictions and states to build them at scale. Funded projects will provide co-benefits to low income and disadvantaged communities by creating local jobs and targeted hiring in these communities. Projects will also offer organic material diversion for communities, compost availability, and reductions in odor and air pollutants. In addition, the projects could provide renewable energy and fuel from organic waste, reducing dependence on fossil fuels. The use of produced compost could also support carbon sequestration across the State.

This application conforms with Waste Measure Two in the state's Priority Climate Action Plan (PCAP)⁶ and is also aligned with California's broad climate leadership. The State has been a leader in cleaning the air and the fight against climate change for decades. Most recently, California passed Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022).⁷ This bill establishes the State's science-based policy to reduce anthropogenic greenhouse gas emission (GHGs) and achieve carbon neutrality by 2045. This transition will require a historic rate of clean technology production, deployment, rapid consumer adoption, and coordination across all levels of government, while ensuring affordability and maximizing myriad co-benefits. CARB's 2022 Scoping Plan Update⁸ lays out the sector-by-sector, technologically feasible, and cost-effective path for California to achieve the mandates in AB 1279 and highlights how increased climate ambition can address persistent air pollution and opportunity gaps faced by low-income communities and communities of color. To further this goal specifically for methane, at COP 28 California created a partnership of 15 subnational governments⁹ that are committed to reducing methane emissions, and sharing technologies and lessons learned.

Public Resource Code 42999 authorizes CalRecycle to administer a grant program to provide financial assistance to promote in-state development of infrastructure to reduce

⁵ 2019. CalRecycle: SB 1383 Infrastructure and Market Analysis Report. November.
<https://www2.calrecycle.ca.gov/Publications/Download/1401>

⁶ Available online at: https://ww2.arb.ca.gov/sites/default/files/2024-03/California%20CPRG%20Priority%20Climate%20Action%20Plan%202024%20March%201_0.pdf

⁷ Available online at: https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=202102220AB1279

⁸ Available online at: <https://ww2.arb.ca.gov/resources/documents/2022-scoping-plan-documents>

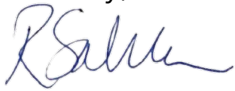
⁹ 2023. CARB. California launches methane-cutting effort with subnational governments at COP28 . December 3.
<https://ww2.arb.ca.gov/news/california-launches-methane-cutting-effort-subnational-governments-cop28>

organic waste or process organic and other recyclable materials into new, value-added products. CARB will continue to work with CalRecycle to support these projects to cut methane pollution from landfills by diverting organic waste. This will help meet the State's 2030 methane reduction goal, and its carbon neutrality goal of 2045. We are confident that CalRecycle's expertise and track record in managing similar programs since 2001 demonstrate its capability to successfully implement these actions.

If you have any questions or need further information, please contact International Advisor Sarah Jo Szambelan, at SarahJo.Szambelan@arb.ca.gov.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "RSahota", is positioned above the typed name.

Rajinder Sahota, Deputy Executive Officer, California Air Resources Board