



May 10, 2024

Submitted via [CARB portal](#)

**Subject: Proposed Amendments to the Low Carbon Fuel Standard Regulation**

Dear Executive Officer Steven Cliff,

The Resource Recovery Coalition of California (RRCC) appreciates the opportunity to provide comments on the proposed amendments to the LCFS regulation. RRCC represents essential waste service providers that offer hauling, recycling, and composting services throughout California. Several of our members have invested in anaerobic digestion facilities to divert organic waste from landfills and produce renewable energy. Nearly all our members utilize low carbon fuels to fuel their solid waste collection vehicles.

We are writing today regarding the avoided methane crediting changes proposed in the LCFS regulation. We, along with many other stakeholders, also support more stringent interim CI reductions and a 2030 target to boost LCFS credit prices and achieve greater emissions reductions.

As currently drafted, the proposed credit phaseout for avoided methane emissions will put in-state producers of low carbon fuels derived from diverted organic waste at a severe disadvantage, as California is the only state with a 75% diversion goal for organic waste. Importantly, this is a statewide goal, not a local requirement. In other words, California communities are not obligated to reduce their organic waste by 75%, rather they are obligated to provide organic waste collection service to all customers. Moreover, local jurisdictions have optionality in how they manage organic waste outside the landfill and are not required to produce low carbon fuels from organic waste. For this reason, we support the continuation of avoided methane emissions credits for California projects that convert diverted organic waste to produce low carbon fuels.

Should California projects not receive avoided methane emission credits, they will be severely disadvantaged by the proposed approach. Out-of-state projects without the same organic waste diversion goals will continue to receive credit for avoided methane emissions, while in-state projects will not. This is in direct conflict with the goals of SB 1383, and could seriously impair our ability to build out the necessary infrastructure to manage diverted organic waste. Currently, we are far behind the 75% organic waste diversion goal, and the proposed language will only serve to exacerbate this issue and slow down a critical opportunity to reduce methane emissions in California. Instead, we need to adopt policies and incentives to increase the in-state production of biogas and biomethane. We strongly urge CARB to not discontinue credit for



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avoided methane emissions based on “targets” for landfill diversion that are not binding legal requirements.

Importantly, CARB should also be working to identify and develop new markets for biomethane, as committed to in the Advanced Clean Fleets resolution. These efforts are critical to California’s short-lived climate pollutant reduction goals.

We thank CARB for all of your hard work in helping California to clean up our air and help mitigate climate change. Please do not hesitate to reach out with any questions.

Sincerely,

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Executive Director

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