



February 8, 2024

Comments submitted [electronically](#)

Subject: Draft Priority Climate Action Plan Under the US EPA Climate Pollution Reduction Grant CPRG Program

Dear Executive Officer Steve Cliff:

The Resource Recovery Coalition of California (RRCC) represents haulers, recyclers, and composters providing essential services throughout the state of California. It is with great pleasure that we offer our support for CARB's Draft Priority Climate Action Plan (PCAP) Under the US EPA Climate Pollution Reduction Grant (CPRG) Program. Specifically, we appreciate the inclusion of immediate actions to reduce California's short-lived climate pollutants (SLCPs), generate carbon negative emissions, and reduce overall greenhouse gas (GHG) emissions.

In particular, RRCC strongly supports funding CalRecycle's waitlist of anaerobic digestion and compost facilities identified in the PCAP for the following reasons:

- Funding CalRecycle's Organics Grant Program will help meet the landfill diversion requirements of SB 1383 and can also generate carbon negative emissions when landfill waste is converted to energy.
- These programs are shovel-ready, mitigating climate change in the near-term by targeting short-lived climate pollutants, which is a primary opportunity to curve climate warming by 2030.
- California is experiencing an organic recycling capacity shortfall and CalRecycle's program is oversubscribed.
- California Climate Investments programs demonstrate that anaerobic digestion and compost projects under CalRecycle's Organics Grant program solicitations are one of the most cost-effective programs at \$53 per each GHG ton reduced, while benefiting priority populations in the majority of cases.
- For each CalRecycle grant dollar invested, 3.8 times of public and private dollars are leveraged to construct these shovel-ready projects.

While we strongly support the overall PCAP, we offer the following suggestions to ensure that any funding received from US EPA provides maximum benefits to California:

- Prioritize investments in SLCP reductions and carbon negative emissions needed to reach carbon neutrality.
- Require funding programs to prioritize projects that provide the greatest carbon reductions on a lifecycle basis.
- Include subsidies for BioMAT (distributed generation bioenergy) projects that help to reduce SLCP emissions, wildfire risks, landfill waste, and open burning.



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- Explicitly include the use of biochar to sequester carbon and/or reduce emissions in the Healthy Soils program.
- Include hydrogen fueling infrastructure, as well as electric vehicle charging, in heavy-duty and medium-duty transportation funding.

We thank you for your draft PCAP and for your consideration of our recommendations.

Please do not hesitate to reach out should you have any questions.

Sincerely,
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