



February 9, 2024

The Honorable Steven S. Cliff  
Executive Officer  
California Air Resources Board  
Sacramento, CA 95814

**Re: Comments on California's Draft Priority Climate Action Plan and Funding of \$58 million for CalRecycle's Wait List of Anaerobic Digestion and Compost Facilities**

Dear Executive Officer Cliff:

I am writing on behalf of California Waste & Recycling Association (CWRA) to commend the Air Board for the Draft Priority Climate Action Plan (PCAP). The PCAP provides an excellent summary of the most urgent – and shovel ready – actions the State can take to address climate change, including actions to reduce Short-Lived Climate Pollutants, generate carbon negative emissions, and reduce overall greenhouse gas emissions. The PCAP will also provide significant benefits for public health and safety by reducing the use of diesel and other fossil fuels while reducing pollution from landfills.

In particular, CWRA supports funding the CalRecycle Wait List of Anaerobic Digestion Pre-processing for Anaerobic Digestion and Compost Facilities identified in the PCAP:

- Funding CalRecycle's Organics Recycling Grant program, which will help to 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 has become the primary program to bend the climate curve by 2030.
- CalRecycle awarded over \$130 million to 23 projects where there were 68 applicants asking for \$387 million, showing that the program was 3 times oversubscribed. There is a wait list for 10 shovel-ready projects totaling \$58 million that could begin construction immediately if funded.
- The California Climate Investments Programs utilizing Cap-and-Trade dollars shows that anaerobic digestion and compost projects under CalRecycle's Organics Grants solicitations are one of the most cost-effective programs at just \$53 per each GHG ton reduced while benefiting priority population in 78% of their cases.
- For each CalRecycle grant dollar invested, another 3.8 times of public and private dollars are leveraged to construct these shovel-ready projects.

CWRA strongly supports the PCAP, we do offer a few suggestions to ensure that any funding received from US EPA provides maximum benefits to California:

1. CARB should prioritize investments in short lived climate pollutants reductions, which are the most urgent climate measures since they begin to benefit the climate right away, and carbon negative emissions needed to reach carbon neutrality.
2. All funding programs should be required to prioritize projects that provide the greatest carbon reductions on a lifecycle basis such as for composting.
3. The Healthy Soils program should explicitly include the use of compost to sequester carbon and/or reduce emissions.
4. Transportation funding, including heavy and medium duty truck funding, should include hydrogen fueling infrastructure as well as electric vehicle charging. We see a future where the renewable natural gas that we produce could be converted into hydrogen someday for the next generation of heavy-duty fleet vehicles.

Thank you for developing the Draft PCAP and for considering our suggestions. Please feel free to reach out with any questions.

Sincerely,



David E. Fahrion  
Chief Executive Officer