

May 17, 2023

Assemblymember Chris R. Holden, Chair  
Assembly Committee on Appropriations  
Capitol Office, 1021 O Street, Suite 8220  
Sacramento, CA 95814

**Re: AB 1705 (McKinnor) – OPPOSE UNLESS AMENDED**

Dear Assemblymember Chris R. Holden:

On behalf of the Green Hydrogen Coalition,<sup>1</sup> we are writing to express our ‘*oppose unless amended*’ position to Assembly Bill (AB) 1705. The bill prohibits the establishment or expansion of a transformation facility or engineered municipal solid waste (EMSW) conversion facility until the Department of Resources Recycling and Recovery (CalRecycle) has determined that the state has achieved its waste reduction and methane reduction goals for three consecutive years. While the stated goal of AB 1705 is to stop incineration of waste, it would ban the establishment or expansion of facilities that use pyrolysis or other conversion technologies to convert organic waste to hydrogen. We therefore object to the following provision:

- ***Non-combustion conversion options for organic waste to hydrogen projects:*** The bill appears to ban pyrolysis and other conversion options for organic waste to hydrogen projects. The GHC does not support this approach since this would set back several organic waste to hydrogen projects in California. Accordingly, we ask that the bill be amended to allow the establishment or expansion of facilities that use pyrolysis or other conversion technologies to convert food and other organic waste to hydrogen.

Renewable hydrogen, regardless of its production pathway, has been identified at both the federal and state level as a critical tool for achieving our decarbonization goals. Using hydrogen that is produced from the non-combustion conversion of organic waste helps reduce emissions in two ways: (1) the hydrogen produced from this process can be used as an alternative to fossil fuels in hard-to-electrify sectors and (2) it helps remove organic waste that would otherwise lead to greater emissions. Since more than one-third of California’s waste can be classified as organic waste<sup>2</sup> and the cofiring, burning, or leaving of organic waste to decay is a large source of two of the most powerful short-lived climate pollutants (methane<sup>3</sup> and black carbon<sup>4</sup>), the issue of organic waste cannot be ignored. Therefore, the GHC maintains that by arbitrarily

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<sup>1</sup> See: <https://www.ghcoalition.org/>

<sup>2</sup> “Organic Materials Management.” CalRecycle Home Page, <https://calrecycle.ca.gov/organics/>. Accessed 9 May 2023.

<sup>3</sup> “Overview of Greenhouse Gases.” Environmental Protection Agency (EPA), <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>. Accessed 9 May 2023.

<sup>4</sup> “Black Carbon.” Climate & Clean Air Coalition, <https://www.ccacoalition.org/en/slcps/black-carbon>. Accessed 9 May 2023.



banning the conversion of organic waste to hydrogen projects, California will be left to try to decarbonize without this critical tool.

We respectfully urge you to amend this bill to address our concerns. Thank you for considering our position on this important matter.

Sincerely,

**Janice Lin**  
Founder and President  
Green Hydrogen Coalition

**Nick Connell**  
Interim Executive Director  
Green Hydrogen Coalition

**CC Assembly Committee on Appropriations Members:**

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