



MARK PESTRELLA, CHAIR  
MARGARET CLARK, VICE - CHAIR

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331  
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460  
[www.lacountyiswmtf.org](http://www.lacountyiswmtf.org)

March 15, 2021

The Honorable Chris R. Holden, Chair  
Assembly Committee on Utilities and Energy  
State Capitol, Room 5132  
Sacramento, CA 95814

Dear Assembly Member Holden:

**OPPOSE - ASSEMBLY BILL 33 (TING) AS INTRODUCED ON DECEMBER 7, 2020 –  
NATURAL GAS**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **opposes** Assembly Bill 33 (AB 33), as introduced on December 7, 2020.

If enacted, the proposed legislation would prohibit new public buildings for which construction begins on or after January 1, 2022, to have natural gas connections. This bill would prohibit the Department of General Services from approving or providing funding for the construction on new school buildings that have natural gas connections. This bill would require each electrical corporation and publicly owned electric utility to file a schedule of rates and charges for the provision of electric service to all-electric homes. Additionally, this bill would prohibit the Public Utilities Commission from authorizing a gas corporation, and a local publicly owned gas utility from providing service extension allowances or line installation allowances to its customers.

The Task Force opposes the proposed legislation because the bill does not allow the energy flexibility necessary for a resilient energy system considering the electricity rolling blackouts that state is currently facing. Further, by eliminating natural gas connections this bill is reducing options for decarbonizing building sectors that may not be easily electrified. Additional options for building decarbonization should be considered including the use of carbon negative Renewable Natural Gas (RNG) from organic waste which is being generated as part of the State's Short-Lived Climate Pollutant (SLCP) reduction strategy.

California is relying on SLCP reduction for more than one-third of all the carbon reductions needed to meet the state's 2030 climate targets. To reduce black carbon and methane emissions, the state's *Short-Lived Climate Pollutant Reduction Strategy* and the *California Forest Carbon Plan* call specifically for increased conversion of organic waste to energy. According to the *California Forest Carbon Plan*, converting biomass to energy cuts both black carbon and methane emissions by 98 percent compared to open burning or wildfires. According to the State Air Resources Board greenhouse gas inventory, approximately 7 million tons of carbon dioxide equivalent emissions are released annually by landfills, and this number is expected to increase to 8.5 million tons by the end of 2020. Using more advanced technologies, biomass energy can also reduce or even eliminate smog forming pollutants as well. Additionally, the Legislative Analyst's Office has consistently found that organic waste processing is one of the most cost effective greenhouse gas emission reduction strategies available.

RNG can have a significant role in meeting the State's carbon neutrality goals including decarbonizing the electricity sector. However, if natural gas infrastructure is eliminated and the markets are reduced then there may not be sufficient incentive to develop the infrastructure necessary to convert organic waste to carbon negative RNG. This lack of infrastructure will impact the State's ability to meet its SLCP reduction, organic waste diversion, and carbon neutrality goals.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

The Honorable Chris R. Holden  
March 15, 2021  
Page 3

Based on the foregoing, the Task Force **opposes** AB 33 as indicated in this letter. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Mayor Pro Temp, City of Rosemead

EC:cso

P:\epub\Budget\IT\TASK FORCE\6-Letters\2021\March\AB 33 - Oppose - LA County Waste Task Force to ASM UE.docx

cc: Assembly Member Philip Y. Ting  
Senator Josh Becker  
Assembly Member David Chiu  
Each Member and staff of the Assembly Committee on Utilities and Energy  
California State Association of Counties  
League of California Cities – Los Angeles County Division  
Each Member of the Los Angeles County Board of Supervisors  
Fesia A. Davenport, Los Angeles County Chief Executive Officer  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Gateway Cities Council of Governments  
Westside Cities Council of Governments  
Each City Mayor and City Manager in the County of Los Angeles  
Each City Recycling Coordinator in the County of Los Angeles  
Each Member of the Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force



MARK PESTRELLA, CHAIR  
MARGARET CLARK, VICE - CHAIR

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331  
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460  
[www.lacountyiswmtf.org](http://www.lacountyiswmtf.org)

March 15, 2021

The Honorable Luz M. Rivas, Chair  
Assembly Committee on Natural Resources  
1020 N Street, Room 164  
Sacramento, California 95814

Dear Assembly Member Rivas:

**OPPOSE - ASSEMBLY BILL 33 (TING) AS INTRODUCED ON DECEMBER 7, 2020 –  
NATURAL GAS**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **opposes** Assembly Bill 33 (AB 33), as introduced on December 7, 2020.

If enacted, the proposed legislation would prohibit new public buildings for which construction begins on or after January 1, 2022, to have natural gas connections. This bill would prohibit the Department of General Services from approving or providing funding for the construction on new school buildings that have natural gas connections. This bill would require each electrical corporation and publicly owned electric utility to file a schedule of rates and charges for the provision of electric service to all-electric homes. Additionally, this bill would prohibit the Public Utilities Commission from authorizing a gas corporation, and a local publicly owned gas utility from providing service extension allowances or line installation allowances to its customers.

The Task Force opposes the proposed legislation because the bill does not allow the energy flexibility necessary for a resilient energy system considering the electricity rolling blackouts that state is currently facing. Further, by eliminating natural gas connections this bill is reducing options for decarbonizing building sectors that may not be easily electrified. Additional options for building decarbonization should be considered including the use of carbon negative Renewable Natural Gas (RNG) from organic waste which is being generated as part of the State's Short-Lived Climate Pollutant (SLCP) reduction strategy.

California is relying on SLCP reduction for more than one-third of all the carbon reductions needed to meet the state's 2030 climate targets. To reduce black carbon and methane emissions, the state's *Short-Lived Climate Pollutant Reduction Strategy* and the *California Forest Carbon Plan* call specifically for increased conversion of organic waste to energy. According to the *California Forest Carbon Plan*, converting biomass to energy cuts both black carbon and methane emissions by 98 percent compared to open burning or wildfires. According to the State Air Resources Board greenhouse gas inventory, approximately 7 million tons of carbon dioxide equivalent emissions are released annually by landfills, and this number is expected to increase to 8.5 million tons by the end of 2020. Using more advanced technologies, biomass energy can also reduce or even eliminate smog forming pollutants as well. Additionally, the Legislative Analyst's Office has consistently found that organic waste processing is one of the most cost effective greenhouse gas emission reduction strategies available.

RNG can have a significant role in meeting the State's carbon neutrality goals including decarbonizing the electricity sector. However, if natural gas infrastructure is eliminated and the markets are reduced then there may not be sufficient incentive to develop the infrastructure necessary to convert organic waste to carbon negative RNG. This lack of infrastructure will impact the State's ability to meet its SLCP reduction, organic waste diversion, and carbon neutrality goals.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

The Honorable Luz M. Rivas  
March 15, 2021  
Page 3

Based on the foregoing, the Task Force **opposes** AB 33 as indicated in this letter. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Mayor Pro Temp, City of Rosemead

EC:cso

P:\epplibudget\TASK FORCE\6-Letters\2021\March\AB 33 - Oppose - LA County Waste Task Force to ASM NAT RES.docx

cc: Assembly Member Philip Y. Ting  
Senator Josh Becker  
Assembly Member David Chiu  
Each Member and staff of the Assembly Committee on Utilities and Energy  
California State Association of Counties  
League of California Cities – Los Angeles County Division  
Each Member of the Los Angeles County Board of Supervisors  
Fesia A. Davenport, Los Angeles County Chief Executive Officer  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Gateway Cities Council of Governments  
Westside Cities Council of Governments  
Each City Mayor and City Manager in the County of Los Angeles  
Each City Recycling Coordinator in the County of Los Angeles  
Each Member of the Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force