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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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September 27, 2021

Ms. Liane M. Randolph, Chair
California Air Resources Board
Post Office Box 2815
Sacramento, CA 95812

Dear Ms. Randolph:

COMMENTS ON PROPOSED ADVANCED CLEAN FLEETS RULEMAKING

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the Advanced Clean Fleet (ACF) Proposed Regulations and Workshop held on September 9, 2021.

The Task Force strongly supports the targets established by Governor Newsom's executive order N-79-20 and regulations that will help the State meet Senate Bill 32 (SB 32) emissions targets to reduce greenhouse gas (GHG) emissions 40 percent below 1990 levels by 2030, as well as the funding of programs to support the use of Zero Emission Vehicles (ZEV). The key to meeting the timelines set forth in the proposed ACF regulations is the serviceability and availability of certain electric heavy-duty vehicles on the market and making sure that there is a robust electrification infrastructure ready to support the transition for short-haul and long-haul heavy-duty vehicles from diesel to electric.

The Task Force urges California Air Resources Board (CARB) to ensure that the ACF regulations include the appropriate use of biomethane produced from organic waste to immediately reduce short-lived climate pollutant (SLCP) emissions and eliminate the use of diesel to reduce black carbon. The Task Force also would like to emphasize the importance of working closely with jurisdictions and other State agencies to ensure electrification infrastructure is ready to accommodate fully ZEV fleets in the timeline specified and streamline the exemptions process for Public Fleets outlined in Section 95693.2.

§95693.2 (a) of the proposed regulations states that public agencies can apply for an exemption from ZEV or near zero emission vehicle (NZEV) purchase requirements if the vehicles will be designated to provide emergency response in supporting electricity,

natural gas, water, or wastewater services across California or in other states. The Task Force requests that CARB include municipal solid waste haul trucks in §95693.2 (a) of the proposed regulations.

CARB should take the lead in monitoring the market, verifying the viability of ZEVs for each class of vehicles, working with other State agencies to develop publicly accessible charging or hydrogen fueling infrastructure in line with the transition schedule to full ZEVs, and develop a list of provisional exemptions by truck class and regions where ZEVs are not suitable for emergency response.

Emergency service fleets, including water service vehicles and other utility trucks should automatically be exempt until battery technology and charging infrastructure are available that can meet the service needs of this sector. Currently, charging batteries takes hours which makes it extremely difficult for many fleet operators to charge batteries of utility trucks while on duty. In addition, many of these operators of ZEV service vehicles may find themselves in remote areas where they are unable to charge and therefore cannot function reliably while on duty for several days.

The ACF regulations provide an opportunity for CARB to align electrification policies with the requirements of Senate Bill 1383 (2016) which currently calls for a 40 percent reduction in methane and a 50 percent reduction in anthropogenic black carbon by 2030. To reduce methane, CalRecycle's regulations include reducing landfill disposal of organic waste by 75 percent by 2025 and requires jurisdictions to procure and use products like biomethane produced from the processing of organic waste.

Projects that process organic waste have the added benefit of generating carbon negative biomethane and electricity that can be used to replace fossil-based energy sources including diesel, which is by far the largest source of air pollution in the San Joaquin Valley and the South Coast Air Quality Districts. Capturing methane generated from organic waste and eliminating the use of diesel can help avoid catastrophic climate change and drastically benefit public health and safety from wildfires, airborne pollutants, and many other natural and man-made disasters.

The ACF regulations should recommend strategies that advance policies, programs, and projects to replace diesel and fossil fuels used for vehicles and electricity generation with carbon negative biomethane generated from organic waste. This includes support for low NOx NZEVs which would help immediately get heavy duty diesel vehicles off the road to reduce air pollution and improve public health while heavy duty ZEV technologies continue to improve.

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

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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.

In summary, the Task Force strongly encourages CARB to consider the recommendations above when updating the ACF Regulations. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at 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
Council Member, City of Rosemead

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cc: Each Member of the California Air Resource Board
Richard Corey, Executive Officer, California Air Resources Board
Rachel Wagner, Director, CalRecycle
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
Gateway Cities Council of Governments
San Gabriel Valley Council of Governments
South Bay 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