

April 7, 2023

Cheryl Laskowski, Ph.D.
Chief, Transportation Fuels Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on Proposed Advanced Clean Fleets Regulations from Vernon Chamber

Dear Dr. Laskowski:

On behalf of the rendering industry community located in the city of Vernon, (Los Angeles County), Vernon Chamber of Commerce would like to provide comments on the proposed Advanced Clean Fleet (ACF) regulations. Vernon Chamber recognizes the substantial work CARB has accomplished in developing this proposal and appreciates the numerous opportunities offered for stakeholder involvement. The Chamber supports the improvement of the state's climate and air quality goals, especially the transition to cleaner vehicles.

The following comments from the Vernon Chamber are focused on the proposal's possible impact on the ongoing implementation of 1383. Significant air quality improvement is being achieved under 1383 by diverting organics from landfills, thus, reducing landfill gases, such as methane.

In CARB's most recent proposal, the importance of meeting 1383 landfill minimization goals is discussed as a reason for delaying implementation of the ACF regulation for waste and wastewater fleets that are involved in landfill diversion under 1383. **The Chamber recognizes this approach but recommends to also include rendering operations to receive an extension, as they are essential to 1383 implementation.**

The Chamber has been very involved with the City of Vernon in its efforts to bring waste haulers and businesses into compliance with 1383, including partnering on numerous educational forums. It is clear that the City of Vernon and numerous other cities rely on renderers in order to comply with 1383. CalRecycle recognizes rendering as a critical component to qualify as landfill diversion under 1383. On CalRecycle's website located at: <https://calrecycle.ca.gov/organics/slcplfaq/swf/#misc>, the fourth question under "Miscellaneous" specifies that rendering constitutes landfill diversion as required by 1383.

Many rendering trucks are already using alternative fuels, such as biodiesel and renewable diesel. Thus, it is consistent to include them in the delayed implementation being proposed for waste and wastewater vehicles.

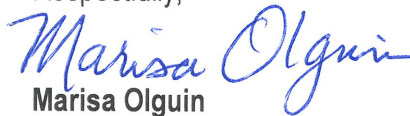
Rendering provides many air quality benefits to the state of California. The rendering process is carbon negative. Rendering is the greenest option for recycling organics. Rendering of animal by-products sequesters at least five times as much greenhouse gas (GHG) emissions as it emits.

We recognize the importance of rolling out the Advanced Clean Fleet regulations and to continue the transition to cleaner fleets, especially within densely populated regions such as Southern California.

As rendering operations are doing the critical work of diverting organic waste from landfills, we urge CARB to allow the same implementation schedules for renderers as you have for waste haulers, as both are essential to the success of fulfilling the 1383 program.

Thank you for your attention and consideration.

Respectfully,



Marisa Olguin

President / CEO

Vernon Chamber of Commerce

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Vernon, CA 90058

About Vernon

Vernon is a 5.2-square-mile, incorporated city located just six miles southeast of Downtown Los Angeles in Southern California. Founded in 1905 as the first exclusively industrial city in the Southwestern United States, Vernon is home to 1,800 businesses that employ over 40,000 people, with a surging \$8.5 billion in economic output to the region's economy and originates goods still manufactured in the USA. Offering a unique environment that caters to business, industrial clusters that make their home in Vernon include cold storage, food processing, plastics, steel, apparel design, furniture, rendering / recycling, and other unique industries. Some of the most prominent companies headquartered or hold operations in Vernon are Tapatio Hot Sauce, Farmer John Meats, Whole Foods, F. Gaviña & Sons coffee, Red Chamber, MyMochi ice cream, Karen Kane, and Fashion Nova. Vernon's borders are within minutes to all major transportation thoroughfares and its in-demand location accounts for robust goods movement that includes four major Downtown LA Freeways, LA-area airports, the LA and Long Beach ports, Alameda Rail Corridor, and the Hobart Yard which is the largest inter-modal train facility in the world.