



MARK PESTRELLA, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

January 3, 2022

IN REPLY PLEASE

REFER TO FILE: **EP-4**

Advanced Clean Fleets
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95814

PROPOSED ADVANCED CLEAN FLEETS REGULATION

Los Angeles County Public Works is pleased to provide comments to the California Air Resources Board (CARB) for use in the development of the proposed Advanced Clean Fleets (ACF) Regulations.

Public Works agrees that investment and incentive programs and policies should progressively transition to full electrification of the transportation sector as soon as possible with some consideration for emergency vehicles and Near-Zero Emissions Vehicles (NZEVs) that use Renewable Natural Gas (RNG) from organic waste.

Organic waste in landfills produces methane, which is a Short-Lived Climate Pollutant (SLCP) 86 times more damaging to the climate than carbon dioxide. The conversion of organic waste to carbon negative RNG used by NZEVs replaces fossil fuels and can remove 84 million tons per year of CO₂ from the atmosphere to help the State achieve its Carbon Neutrality goals by mid-century.¹ To address SLCPs, the State passed Senate Bill (SB) 1383 in 2016 requiring local jurisdictions to reduce disposal of organic waste by 75 percent of 2014 levels by 2025. SB 1383 also requires local jurisdictions to purchase beneficial products made from recovered organic waste, such as RNG.

CARB's Advanced Clean Fleet rules and Low Carbon Fuel Standards Program are an important part of addressing greenhouse gas emissions from the transportation sector, achieving air quality benefits, reducing petroleum dependency, decreasing the carbon intensity of California's transportation fuel, and identifying low-carbon and renewable alternatives. Please consider the following recommendations when developing the new ACF rules and LCFS updates:

¹ Lawrence Livermore National Lab, Getting to Neutral: Options for Negative Carbon Emissions in California, January 2020.

January 3, 2022
Page 2

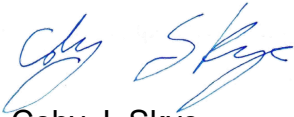
1. Allow NZEVs with low-NOx engines using RNG to immediately replace highly polluting diesel engines while markets for heavy duty Zero Emissions Vehicles (ZEV) technologies continue to mature.
2. Acknowledge the overlapping requirements of SB 1383 and ZEV goals and assist jurisdictions in complying with both while helping the State to meet its carbon neutrality goals.
3. Develop Low Carbon Fuel Standards pathways to ensure markets exist for RNG from organic waste processed in California to make electricity and hydrogen to fuel ZEVs and necessary processing infrastructure are developed.
4. Provide an exemption for specialized vehicles used by local agencies to provide emergency services.

Additional details on how these recommendations can help achieve several State mandates simultaneously are included in the enclosed.

We look forward to working with CARB and other agencies to help the State achieve its many air quality, greenhouse gas reduction, carbon neutrality, and sustainability goals. If you have any questions, please contact Mr. Christopher Sheppard at (626) 458-3592 or csheppard@pw.lacounty.gov, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

Mark Pestrella, PE
Director of Public Works



Coby J. Skye
Assistant Deputy Director
Environmental Programs Division

CJS:ak
P:\SEC\AK\EP4\PW ACF COMMENT LETTER

Enc.