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December 2, 2019

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California Air Resources Board

1001 I Street

Sacramento, CA 95814

### Re: Proposed Advanced Clean Trucks Regulation

Dear Chair Nichols,

The California Refuse Recycling Council, Northern District, is grateful for the opportunity to comment on the Proposed Advanced Clean Trucks (ACT) Regulation. Our association is comprised of 34 waste management and recycling companies committed to reducing greenhouse gas (GHG) emissions and meeting California's ambitious landfill diversion goals.

To achieve the goals of SB 1383 and reduce emissions of the short-lived climate pollutant methane, we will need to divert over 25 million additional tons of organics annually from California landfills. A significant amount of this material will be anaerobically digested to produce renewable natural gas (RNG). In fact, CalRecycle's SB 1383 regulations mandate jurisdiction procurement of organic waste products beginning 2022, such as compost and RNG. RNG as a low carbon fuel source is not only a critical component to meeting the goals of SB 1383, but it is a viable near-term strategy in meeting our heavy-duty vehicle emission reduction goals.

Accordingly, we strongly support the inclusion of low NOx trucks that meet a 0.02 g/bhp-hr NOx certification standard in the ACT strategy. The ACT proposal currently includes limited flexibility for "near-zero" technologies, but is restricted to plug-in hybrids with some all-electric range. Low NOx engines are considered a near-zero technology and are a critical step in achieving California's air quality goals. Any new definition of "near-zero" should be vetted through a separate regulatory process as the current proposed ACT definition is not aligned with generally accepted use, and severely limits its application.

Additionally, we support the bifurcation of the large entity reporting requirement from the manufacturer requirement. Several concerns have not yet been addressed around reporting expectations, enforcement outcomes, cost implications, and potential data vulnerability. We ask that CARB extend the public process on the Large Entity Reporting Requirement in order to solicit appropriate feedback and address stakeholder concerns.

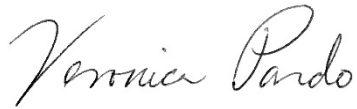
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Affiliate of West Coast Refuse & Recycling Coalition (WCRCR)

We thank you for the opportunity to comment on the proposed regulations. We look forward to working with you to achieve California's air quality goals through the continued advancement of beneficial clean air technologies. Please do not hesitate to reach out to our Governmental Affairs team with any questions.

Sincerely,



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