



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

December 13, 2022

Mr. Steven S. Cliff, Ph.D.
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Final Draft 2022 Scoping Plan Update

Dear Dr. Cliff:

The Rural County Representatives of California (RCRC) is an association of forty California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. RCRC member counties are tasked with a variety of decision-making responsibilities related to solid waste and recycling, land use and development, and environmental stewardship in rural California communities; all the while, being challenged with maintaining economic vitality and social equity at the local level. We appreciate this opportunity to offer comment on the Final Draft 2022 Scoping Plan Update (final draft).

Natural and Working Lands

RCRC member counties contain the majority of California's forested lands, and we continue to appreciate the inclusion of modeling for this sector in the final draft Scoping Plan. This sector has contributed to high emission levels and carbon sequestration loss in the past decade, and it is completely appropriate to consider natural and working lands resilience as part of the Scoping Plan.

While RCRC appreciates the aggressive target of at least 2.3 million acres treated statewide annually in forests, shrublands/chaparral, and grasslands, California currently struggles to meet the million acres per year target in the Wildfire and Forest Resilience Action Plan set forth by the Administration in 2021. The three major reasons are 1) lack of sustained annual funding; 2) lack of infrastructure to utilize byproducts from active management of forest and other wildlands; and 3) slowdowns caused by permitting and legal challenges. RCRC has long advocated for dedicated funding allocated to resilience programs as an important part of California's vital natural infrastructure. We look forward

1215 K Street, Suite 1650, Sacramento, CA 95814 | www.rcrcnet.org | 916.447.4806 | Fax: 916.448.3154

to working with CARB to encourage the Legislature to dedicate permanent, long-term investments to resilience programs in the natural and working lands sector.

RCRC is also pleased that the final draft identifies expansion of biomass processing infrastructure as a strategy for success. The state must embrace a suite of clean options to utilize byproducts from maintaining our natural and working lands such as woody biomass in order to eliminate current practices of piling and burning or simply piling and allowing materials to deteriorate and emit greenhouse gases. All of biomass to energy, cross-laminated timber, biochar, biomethane should be under consideration and embraced by CARB for utilizing materials removed from wildlands during the process of managing for better resilience and wildfire prevention. Otherwise, the 2.3 million acre target is simply another empty goal with insufficient infrastructure to carry it out.

Finally, we appreciate the inclusion of permit streamlining in the final draft's Strategies for Achieving Success in the forests, shrublands and chaparral sector. Onerous permitting requirements have acted as a barrier to completing resilience projects in this sector for decades, at times leading to high severity wildfires and even the destruction of entire communities. Permitting requirements have allowed legal challenges to delay projects for months and even years while the quality of California's wildlands continues to degrade. Our members look forward to working collaboratively with CARB staff to explore additional permit streamlining options to expedite projects while continuing to safeguard the ecosystems provided by the state's forests and wildlands.

Reducing Methane Emissions from Landfills

Within RCRC's membership, twenty-six member counties have also formed the Rural Counties' Environmental Services Joint Powers Authority (ESJPA) to provide assistance to solid waste managers in rural counties. These solid waste managers have been charged with ensuring that their respective counties meet state-imposed requirements to reduce waste being disposed in landfills and increase recycling/re-use efforts for certain products. Our counties' solid waste managers are dedicated to providing meaningful, environmentally conscious, and cost-effective solid waste services to their residents and businesses.

RCRC and ESJPA members have worked diligently with staff at the California Department of Resources Recycling and Recovery (CalRecycle) to secure implementation extensions to 2025 of the Short-Lived Climate Pollutants (SLCP) Organics requirements pursuant to Senate Bill 1383 (Lara, 2016) for counties with populations of less than 70,000, the same counties which received an extension in the Mandatory Commercial Organics Recycling (MORe) regulations. Many of our member counties are in areas of air quality attainment while also facing the biggest challenges with meeting the procurement, infrastructure and collection requirements contained in the final regulations. RCRC has also advocated for much needed funding passed by the

Legislature as part of the 2022-23 State Budget Package to aid local jurisdictions in implementation.

While RCRC and ESJPA are committed to continuing our collaborative work with CalRecycle on SB 1383 implementation, there are still challenges to realizing the benefits from the measure. As rural jurisdictions work to ensure full compliance with SB 1383, a number of unforeseen barriers have arisen that could easily prevent the state from fully realizing the emissions reduction benefits from the regulations. These potential impediments include: wildly inconsistent messaging within CalRecycle to waste jurisdictions on implementation and enforcement of the regulations; conflicts on whether mandatory curbside collection is required versus allowing residents to self-haul their organics; and resistance in some areas of the state from edible food procurement partners. The California Air Resources Board is also still working through zero emission vehicle (ZEV) requirements to ensure a clear path to the renewable biofuels requirements in SB 1383.

RCRC appreciates the thoughtful analysis of this process in the final draft and encourages CARB to work with solid waste jurisdictions on the strategies on pages 234-235 before any subsequent policies or regulatory actions are proposed. We strongly support the use of byproducts from landfills to produce biomethane and other beneficial products that can be extracted from landfill waste. However, the state must be willing to partner with local jurisdictions and invest in technologies and infrastructure in order to make the final strategies feasible, particularly in rural communities. The most glaring omission from SB 1383 is the lack of upfront investment in infrastructure to enable jurisdictions to be successful. Rural communities, in particular, cannot sustain state-imposed strategies that do not come with significant state financial investment.

Transportation Sustainability

RCRC appreciates that the Final Scoping Plan acknowledges the tremendous challenges of deploying a fully ZEV fleet statewide. Greater consideration of California's infrastructure, such as a safe, reliable energy grid and prolific, available charging infrastructure is needed especially in rural and remote corners of the state. We also appreciate the inclusion of rural communities as a target for energy reliability projects as well as the robust discussion regarding the need to diversify the state's renewable energy resources including solar, wind, energy storage, geothermal, biomass, and hydroelectric power. The Scoping Plan is correct to note on page 9 that electrification is not possible in all situations and that it must be nimble to promote feasible options to achieve long-term clean energy and climate goals.

RCRC further recommends that CARB work with the California Energy Commission and other agencies to evaluate the feasibility of electric vehicles (EVs) in rural communities and the dire need to increase public charging infrastructure in rural corridors. In rural areas where EV users traverse longer distances or venture into more

remote recreational destinations, public charging opportunities are critical to provide a realistic and reliable alternative to gasoline or diesel fueled vehicles. Rural corridors are essential connectors between population centers. Currently, manufactured electric vehicles do not have the range to traverse long distances between metro destinations without interspersed charging.

Furthermore, rural corridors and communities often see a plethora of medium and heavy-duty trucks transporting goods, as well as large farm equipment and recreational vehicles. Rural communities need wide-ranging public EV charging options to meet the end users power needs, as well as time or workforce constraints during recharging. Finally, the focus should include fast charging facilities to reflect the need for quick charging between the long, oftentimes mountainous, distances in rural areas of the state.

Clean Electricity Grid

Given the state's emphasis on electrifying buildings and transportation, decarbonizing the grid is essential to realizing carbon neutrality goals. Energy distribution must be safe, reliable and affordable. Unfortunately, California struggles with all three of these components in rural areas. We urge the Scoping Plan to acknowledge the reliability implications of utilities de-energizing distribution infrastructure (proactively and reactively) for wildfire safety and extreme weather conditions. Without appropriate grid hardening, there are potentially long-term implications to phase out fossil fuels in existing buildings, equipment, and vehicles. Furthermore, certain utilities servicing rural counties are experiencing significant delays for interconnection projects—from energizing new housing to industrial facilities—and will not sufficiently identify areas with current load capacity to aid local planning and future project development.

RCRC appreciates your consideration of our comments. If you should have any questions or would like to discuss our comments further, please contact me at (916) 447-4806 or sheaton@rcrcnet.org.

Sincerely,



STACI HEATON
Senior Policy Advocate