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MARCH 6, 2018

Ms. Lisa Williams, Air Pollution Specialist  
California Air Resources Board, Mailstop 5B  
P.O. Box 2815  
Sacramento, California 95812-2815

Dear Ms. Williams:

### **COMMENTS ON THE PROPOSED BENEFICIARY MITIGATION PLAN FOR CALIFORNIA'S ALLOCATION OF THE VOLKSWAGEN ENVIRONMENTAL MITIGATION TRUST**

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The City of Los Angeles Sanitation Department (LASAN) appreciates the California Air Resources Board (CARB) on developing a Beneficiary Mitigation Plan (*Plan*) for California's \$423 million allocation of the Volkswagen Environmental Trust (Mitigation Trust). In addition to many state's long-term air quality and climate change goals, the proposed *Plan* is also important for achieving many local air quality and greenhouse gas emission reduction objectives as outlined in the "Sustainable City pLAN" that was released by Mayor Eric Garcetti on April 8, 2015.

The LASAN is responsible for providing municipal solid waste management to 750,000 households. For residential solid waste collection, the LASAN is operating over 560 natural-gas powered vehicles, the largest municipal clean-fuel solid waste collection fleet in the Country. Annually, our existing clean-fuel fleet consumes over five-million gallons of liquefied natural gas (LNG); thereby avoiding the usage of over three-million gallons of diesel. Since inception, deployment of the LASAN's natural gas heavy-duty solid waste collection fleet has resulted in an estimated emissions reduction of over 700 tons of NO<sub>x</sub>, 13 tons of particulate matter, and 57,000 MTCO<sub>2e</sub> of greenhouse gases, which is equivalent to avoidance of greenhouse gas emissions from over 11,000 passenger vehicles annually.

The LASAN is purchasing new collection vehicles equipped with Cummins ISL G near-zero emissions natural gas engines, and recently executed a new contract for LNG supply from 100 percent renewable natural gas for further significant reduction of greenhouse gas emissions. In response to Mayor Eric Garcetti's Sustainable City pLAN, LASAN is firmly committed to electrification of our fleet of solid waste collection vehicles. We have issued a Purchase Order for two Class-8 solid waste collection vehicles that are 100 percent electric powered for performance testing, and have developed a solid plan in place to electrify our solid waste collection fleet. In addition, we have installed charging stations at our North Central District Collection Yard to power heavy-duty electric collection vehicles. If LASAN is

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provided with funding from the Mitigation Trust, this will expedite our purchase of zero-emission heavy-duty solid waste collection vehicles to replace the diesel-fueled trucks, thereby providing our residents with more enjoyable and healthy air quality as-well-as assisting the State of California in achieving its emission reduction goals. To this extent, please see our comments below on the proposed *Plan*:

- 1) The *Plan* includes transit, school, shuttle buses, as-well-as freight and port drayage trucks as eligible mitigation action categories. However, solid waste collection vehicles are not listed therein. Our solid waste collection vehicles operate in many areas that were found to have the highest air toxics in the South Coast Air Basin as reported in the Multiple Air Toxics Exposure Study (MATES V) conducted in 2012-13 by the SCAQMD. We ask that funding from the Mitigation Trust be provided for the purchase of new electric powered solid waste collection vehicles. This will accelerate our purchase and deployment of zero-emission solid waste collection vehicles. This will generate air quality benefits, particularly to children residing in disadvantaged communities adjacent to landfills, transfer stations, industrial processing facilities, etc. that are also impacted by other mobile and stationary sources.
- 2) The *Plan* should include a funding category to support Demonstration Projects that involve zero-emission heavy-duty solid waste collection vehicles for which field testing and performance evaluation are needed before they are verified and certified for commercialization.
- 3) The *Plan* should allow the recipients to submit the same projects for funding from other sources, including the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), the Carl Moyer Memorial Air Quality Standards Attainment Program (Carl Moyer Program), and the Mobile Source Air Pollution Reduction Review Committee (MSRC), as long as all co-funding sources to fund a project do not exceed the total project cost.

We thank you for the opportunity to review and comment on the proposed *Plan* for California's \$423 million allocation of the Mitigation Trust. If you have any questions or comments, please do not hesitate to contact Alex Helou, Assistant Director at (213) 485-2210 or Dr. Kim Tran at (213) 485-3522.

Sincerely,

  
ENRIQUE C. ZALDIVAR, Director & General Manager  
LA Sanitation

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- c: Lauren Faber O'Connor, Mayor's Office  
Liz Crosson, Mayor's Office  
Rebecca Andreassen, Mayor's Office  
Kevin James, Board of Public Works Commission President  
Heather Repenning, Board of Public Works Commission Vice-President