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**SOLID WASTE MANAGEMENT COMMITTEE/
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November 18, 2021

Ms. Marybel Batjer, President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Ms. Batjer:

**COMMENTS ON THE CALIFORNIA PUBLIC UTILITY COMMISSION
ENVIRONMENTAL & SOCIAL JUSTICE ACTION PLAN VERSION 2.0 – DRAFT
VERSION FOR PUBLIC COMMENT**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the Environmental and Social Justice (ESJ) Action Plan Version 2.0 (dated October 26, 2021) and commends the California Public Utility Commission's (CPUC) commitment in empowering the ESJ communities to participate in the shaping of the CPUC's operating framework.

The Task Force is especially interested in planning actions that help protect populations vulnerable to the impacts of climate change and strongly supports policies to reduce Short-Lived Climate Pollutants (SLCP) to mitigate the impacts of climate change, especially in disadvantaged communities. In the ESJ Action Plan, the CPUC recognizes:

- Senate Bill 350 the Clean Energy and Pollution Reduction Act of 2015 which directs the California Energy Commission (CEC) and the California Air Resources Board (CARB) to, among other things, study and provide recommendations on barriers for low-income customers to energy efficiency and clean transportation/mobility investments. The Act also requires the CPUC to prioritize disadvantaged communities in its integrated energy resources planning processes.
- Executive Order (EO) N-19-19 signed by Governor Newsom in 2019 to further California's commitment to reduce greenhouse gas (GHG) emissions and mitigate the impacts of climate change to build a sustainable and inclusive economy.

- EO N-79-20 signed by Governor Newsom in 2020 directing the State to meet Senate Bill 32 (2016) emissions targets to reduce GHG emissions 40 percent below 1990 levels by 2030. N-79-20 specifically directs the CPUC and other state agencies to accelerate the deployment of affordable fueling and charging infrastructure for zero-emission vehicles and promotes the creation and retention of high-road, high-quality jobs in the transition to a carbon-neutral economy.

Any effort to combat climate change, develop clean energy, create high-quality jobs, and reduce pollution in disadvantaged communities, must also acknowledge Senate Bill 1383 (SB 1383) the Short-lived climate pollutants: methane emissions: dairy and livestock: organic waste: landfills act of 2016. Organic waste disposed of in landfills has the potential to generate significant emissions of methane, a powerful climate pollutant that is 84 times more powerful than carbon dioxide in terms of atmospheric warming. SB 1383 and adopted regulations in November of 2020 require local jurisdictions to implement mandatory organic waste diversion programs to reduce landfill disposal of organic waste (2014 base line) by 75 percent by 2025. To divert solid waste from landfills, the State will need new infrastructure to process the organic waste.

The ESJ Action Plan Goal 2 (Draft Version) is to increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health. The CPUC policies and actions can play a big role in supporting the development of technologies that immediately reduce emissions of methane, reduce pollution in disadvantaged communities, and create new clean energy jobs. The State desperately needs infrastructure such as anaerobic digestion and other alternative technologies that produce low carbon fuels and energy from organic waste to decarbonize the electricity and gas sectors. CalRecycle estimates that the SB 1383 regulations will cost \$40 billion to implement Statewide, with nearly \$4 billion needed for capital infrastructure investment. CPUC can prioritize actions that reduce methane by supporting policies that advance the procurement of biomethane gas produced from organic waste processing.

The purpose of the Goal 4 of the ESJ Action Plan (Draft Version) is to increase climate resiliency in ESJ communities. ESJ principles and combating SLCP in disadvantaged communities can be achieved simultaneously. The Task Force strongly encourages CPUC to continue to prioritize actions and goals that encourage investments in projects that reduce SLCP in disadvantaged and low-income communities. This feat will require collaboration and partnering with the public and the electric and gas utility companies as well as educating the public about the immediate threat of SLCPs, such as methane and black carbon emissions, that afflict their communities disproportionately.

Organic waste management projects not only reduce methane gas sources, but they also generate carbon-negative biomethane that can be used to replace fossil-based energy sources including diesel, which is by far the largest source of air pollution in the San Joaquin Valley and the South Coast Air Quality Management Districts. As the CPUC

conducts a sector-specific study of the air quality impacts of transportation, electrification, building energy, and the distribution of energy resources, consider the renewable energy from processing organic waste and how ESJ communities' benefit from both waste reduction and utilization of clean energy.

SB 1383 requires jurisdictions to procure biomethane produced from the processing of organic waste to produce renewable natural gas (RNG), electricity, or hydrogen. In alignment with the CARB and CEC policies, the CPUC is developing and implementing actions that require the gas and electric utilities to procure renewable electricity to reduce greenhouse gas emissions and to improve ESJ Communities' access to electric vehicle charging. ESJ communities would benefit even more if the vehicles run on electricity, hydrogen, or RNG generated from carbon-negative biomethane from organic waste processing. To reduce air pollution and improve public health especially in disadvantaged communities, these renewable fuels would help immediately get diesel vehicles off the road and eliminate diesel in backup generators. As public and private fleets gradually purchase reliable heavy-duty electric and hydrogen vehicles and the electric charging depot stations are built throughout the state, RNG can replace diesel in the interim, especially for Low NOx near-zero emissions heavy-duty trucks.

Overall, the Task Force would like to emphasize the CPUC's role in developing policies and engaging the ESJ community in ways that help the State properly managing organic waste and use the biomethane produced to generate clean fuels and electricity that can replace fossil sources. Measures to better manage organic waste have enormous co-benefits for public health and safety by reducing methane and dependence on air-polluting fossil fuels. It will also help stimulate the economy and create new jobs.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

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In summary, the Task Force strongly encourages CPUC to consider the goals of SB 1383 when updating the ESJ action plan. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Sam Shammas, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force

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