MARK PESTRELLA, CHAIR
MARGARET CLARK, VICE - CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org

April 10, 2017

Ms. Mary Nichols, Chair
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Dear Ms. Nichols:

COMMENTS ON THE DRAFT ENVIRONMENTAL ANALYSIS FOR THE PROPOSED STRATEGY FOR ACHIEVING CALIFORNIA'S 2030 GREENHOUSE GAS TARGET

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express its appreciation to the California Air Resources Board (ARB) for the opportunity to provide comments on the Draft Environmental Analysis (Draft EA) for the Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target (Proposed Plan). A link to the Proposed Plan is provided below:

https://www.arb.ca.gov/cc/scopingplan/app_f_draft_environmental_analysis.pdf

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended), 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, 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, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

The Task Force has several recommendations to include in the Final Environmental Analysis (Final EA):

General Comment:

- The Final EA or Final Scoping Plan should quantify and compare the emissions, health, and economic impacts of different end uses of organic waste, including biofuels, electricity, pipeline biogas, and compost.

Specific Comments:

- In describing the impacts of known commitments (beginning on page 12), the Final EA should compare the environmental impacts, including life-cycle greenhouse gas (GHG) emissions, of the use of low carbon fuels as part of the Low Carbon Fuel Standard with the use of zero emission vehicles (ZEVs) as part of the Mobile Sources Strategy (Clean Technology and Fuels Scenario) and Sustainable Freight Strategy.

- Zero emission vehicles (ZEVs) use lithium batteries. As stated in the Draft EA, the increased use of ZEVs will result in an increased need for lithium battery manufacturing and recycling (page 23). Low-nitrous oxide (NOx) engines fueled by renewable natural gas (RNG) produced from solid waste will result in greater GHG reductions without producing additional hazardous waste in the form of batteries. For certain vehicle types, low-NOx engines using RNG may be a more effective than ZEVs for reducing GHG emissions. In the description of measures under the Mobile Sources Strategy (Clean Technology and Fuels Scenario) and Sustainable Freight Strategy, the Final EA should include a description of the benefits of using low-NOx engines for vehicles such as on-road heavy-duty vehicles (page 18).

- In the Draft EA, methane reduction measures under the SLCP Strategy (described on pages 61 and 97) and fugitive methane emissions reduction measures (described on page 151) include anaerobic digestion (AD) and composting. The methane reduction measures need to include thermal conversion technology facilities. Conversion technologies (CTs) are a wide array of non-combustion thermal, biological, and chemical technologies capable of converting post-recycled residual solid waste into renewable energy, renewable fuels, and/or useful products. Thermal CT facilities are able to handle a wide variety of wastes, such as contaminated recyclables, medical waste, hazardous waste, or mixed materials such as goods made of more than one type of plastic, for which other processes, such as AD, composting, and recycling, may not be suitable.

- As stated in the Draft EA, the implementation of the Proposed Scoping Plan could result in an increased rate in turnover of vehicle fleets to increase the use of zero-emission technologies (page 149). The Draft EA also states that these vehicles would need to be recycled or shipped for use outside of California (page 150). The Final EA should include a statement that the use of RNG produced from solid

waste will result in greater GHG reductions and produce less waste from existing fleets being replaced by ZEVs.

- The Draft EA states that anaerobic digesters constructed independently from existing wastewater treatments plants (WWTPs) could create strains on utilities and service systems by requiring supplemental water (page 152). As indicated before, the use of thermal CTs to manage waste needs to be considered because these facilities utilize much less water than anaerobic digesters. Therefore, thermal CTs do not need to be co-located with WWTPs in order to receive an adequate water supply without placing a strain on utilities and service systems.

- The Proposed Plan includes a goal to increase organics markets (page 122). The Final EA should analyze the impacts of increasing organics markets based on region. Throughout the State, the production of and demand for organic products varies greatly based on region. The analysis should take into consideration the amount and type (woody, green, food, or other) of organics generated throughout the year, where this organic material can be stored, and how it can be stored safely.

We respectfully request that the above comments/issues be addressed in the Final EA. The Task Force would be pleased to participate in future stakeholder opportunities related to this Plan. Should you have any questions regarding these comments, please contact Mr. Mike Mohajer, a Member of the Task Force, at MikeMohajer@Yahoo.com or at (909) 592-1147.

Sincerely,

Margaret Clark

Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Council Member, City of Rosemead

cc: Scott Smithline and Howard Levinson, CalRecycle (Waste)
Sekita Grant, California Energy Commission (Energy)
Mike Tollstrup and Jack Kitowski, California Air Resources Board (Transportation)
Amrith Gunasekara, California Department of Food and Agriculture (Agriculture)
Frances Spivy-Weber, California State Water Resources Control Board (Water)
David Mallory and Shelby Livingston, California Air Resources Board (Natural Resources)
League of California Cities
League of California Cities, Los Angeles Division

California State Association of Counties
Each Member of the County of Los Angeles Board of Supervisors
Each City Mayor/Manager in the County of Los Angeles
South Coast Air Quality Management District
South Bay Cities Council of Governments
San Gabriel Valley Council of Governments
Gateway Cities Counsel of Governments
Southern California Association of Governments (Carl Morehouse and Huasha Liu)
Each City Recycling Coordinator in Los Angeles County
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Alternative Technology Advisory Subcommittee
Each Member of the Facility Plan Review Subcommittee