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November 19, 2015

## ELECTRONIC MAIL AND U.S. POSTAL SERVICES DELIVERY

Ms. Mary Nichols, Chairperson  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Ms. Nichols:

### **CITY OF LOS ANGELES, BUREAU OF SANITATION COMMENTS ON THE CAP-AND-TRADE AUCTION PROCEEDS SECOND INVESTMENT PLAN DRAFT (RELEASE DATE: OCTOBER 27, 2015)**

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The City of Los Angeles Bureau of Sanitation (LASAN) commends the California Air Resources Board and other state agencies in their efforts to reduce greenhouse gas (GHG) emissions, to address significant climate change and environmental justice issues in the state, and to foster sustainable solutions through the Cap-and-Trade Auction Proceeds public outreach efforts and Second Investment Plan draft released on October 27, 2015.

Mayor Eric Garcetti, concerned about the environmental future of the City, created the first sustainability pLAN for Los Angeles. The pLAN sets the course for environmental protection “as part of a comprehensive framework of sustainability - one that fully embraces a healthy economy and a commitment to social equity”. LASAN is directed in the pLAN to implement and expand environmental programs that provide real opportunities for GHG emissions reductions, local job creation, and air quality improvement in the City of Los Angeles (the City).

As requested by ARB, LASAN is, hereby, suggesting types of programs and projects to be included and/or supported more vigorously in the investment concepts for Cap-and Trade Auction Proceeds.

#### **I. Biogenic Natural Gas Generation Through Anaerobic Digestion of Organic Waste:**

Recent years have seen great technological achievements and policy changes that have created significant new opportunities to implement integrated and sustainable solutions for greenhouse gas emissions reductions. Most significantly, the development of anaerobic digestion facilities

*zero waste • one water*



coupled with the approval of AB1826 requiring increased organic waste recycling by the commercial sector have created an opportunity for the generation of biogenic natural gas from the City's organic waste stream. This biogenic natural gas can be used by the City of Los Angeles fleet of over 500 heavy duty solid waste, natural gas-powered collection vehicles and for City buses and other vehicles. Funding is needed for increased development of anaerobic digestion facilities, organic waste recycling infrastructure, and biogenic natural gas collection, metering, safety, and distribution infrastructure. The implementation of such a program could lead to a sustainable way for municipalities to achieve their waste diversion goals and to simultaneously create a two-pronged increase in their greenhouse gas emissions reductions through the reduction of natural gas usage from nonrenewable fossil fuels, and the capture of methane and other greenhouse gases from organic waste processing facilities for beneficial reuse.

## **II. Conversion Of Heavy-Duty Truck Fleets To Clean Fuel Zero Emissions Heavy-Duty Electric Fleets:**

LASAN continues to replace heavy-duty diesel solid waste trucks with heavy-duty, low-carbon natural gas trucks. These trucks are deployed within the residential neighborhoods of the City, where in addition to reducing greenhouse gas emissions, the use of natural gas as a transportation fuel helps reduce many criteria and toxic air contaminant emissions.

However, technological advances have increased opportunities for zero-emissions heavy-duty electric vehicles to replace older vehicles. Municipalities can become increasingly sustainable and less polluting by converting diesel and natural gas trucks to zero-emissions or hybrid electric trucks; thereby, maximizing the environmental benefits of using renewable energy, such as solar power and wind power. Funding is needed for the conversion of diesel and natural gas fleets and infrastructure to energy efficient electric fleets and electrical charging infrastructure.

## **III. R&D of Increased Energy Efficiency in Renewable Energy Generation and Distribution, Transportation and Industrial and Commercial Operations:**

To support electrification of fleets, funding is also needed for research and development into how to increase energy efficiency in industrial and commercial operations, vehicles and transportation, and renewable power generation and distribution.

## **IV. R&D of Pedestrian or Alternative Multi-family/High-Rise Building Organic Waste Collection Systems:**

As mentioned in the draft Cap-and-Trade Auction Proceeds Second Investment Plan, California's natural resources and waste diversion targets and goals include effective elimination of organic disposal from landfills by 2025. To achieve this goal, LASAN recommends that funding be provided for pilot studies on collection of food waste discarded by pedestrians, including installation of organic waste collection infrastructure such as fixed organic waste collection bins connected to a system of underground collection vaults that can be accessed and cleared by vacuum trucks, or alternatively that contain systems that include their own anaerobic digestion equipment that could generate, collect, and convey biogenic natural gas elsewhere, as well as act as holding tanks for fertilizer. Areas where such bins and vaults

could be located include busy tourist areas such as downtown Los Angeles, adjacent to or within multifamily or high-rise buildings, and food courts.

**V. Promotion of R&D of Local Beneficial Reuse of Solid Resources/ Waste:**

Funding is also needed to support the innovative development of and pilot studies for beneficial reuse of solid waste by the commercial and industrial sectors, including innovative inter-industry and public-private partnerships for increased development of local infrastructure for solid resource recycling. This helps reduce reliance on overseas markets, avoid greenhouse gas emissions due to long-range transport of recyclables to overseas processing facilities, and create local, green job opportunities. Other opportunities include development of infrastructure and partnerships for diversion of nearly expired foods from retail outlets to community kitchens and retailers in disadvantaged communities who can prepare and provide the food at low cost for the poor and homeless or municipal services who can process the food and use the food for agricultural purposes.

**VI. Support Disadvantaged Communities and Homeless Veterans Through Job Creation:**

Disadvantaged communities by enlarge have the burden of dealing with homeless encampments and illegal dumping of solid waste. In homeless encampments, one can often find a wealth of human resources, expertise and talents that can benefit local communities and businesses and is currently temporarily unavailable and lost to the community. Unfortunately many of the homeless are veterans. The City of Los Angeles is committed to assisting and reintegrating veterans who have fallen out of the mainstream economy through the creation of jobs specifically for these individuals through the support of rehabilitation, mental health services, and rehabilitative job training programs. Funds from Cap-And-Trade should be allocated to train homeless veterans and integrate them back into society. Helping homeless veterans off the street and reintegrating them as productive members of our communities and economies, for instance, would not only honor their contributions to our freedom and safety, it would also be socially and economically beneficial to the neighborhoods where they are currently living. This also could potentially reduce the state's carbon footprint through the reduction of short-lived and long-lived greenhouse gas emissions and air pollutants from outdoor stoves, anthropogenic wildfires, and Clean Streets Initiative program cleanup vehicles; thereby, contributing to our achieving greenhouse gas emissions reduction goals and sustainability.

**VII. Air Quality Improvements in Recycling and Waste Management Processes and Facilities:**

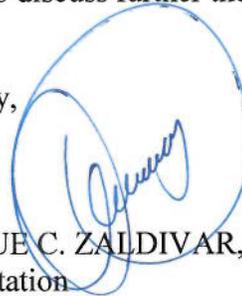
Materials Recovery Facilities (MRFs) receive recyclable items from the city's blue-bin collection system. Improved processing of materials at materials recovery facilities could improve the recovery rate and provide better quality materials for beneficial reuse, in addition to improving working conditions for employees and reducing greenhouse gas and air toxics emissions. Funding is needed for research and development of and pilot programs that would lead to more efficient, cleaner, and safer ways to sort and handle solid waste. For instance, funding is needed for improved waste sorting systems to enhance recovery of recyclables, and ventilation and air cleaning systems at Materials Recycling Facilities and waste transfer stations; thereby, improving local air quality and the workplace environment for people who work at the MRFs.

**VIII. Integrated Organic Waste and Sewage Collection and Treatment:**

Funding is needed for research and development on the integration of organic waste and sewage waste collection in building and city planning and design to allow for the integrated treatment of these waste streams to generate beneficial products such as biogas, biofuels, agricultural fertilizer, and heat and power for societal use, while reducing methane, other greenhouse gases, and other air toxics released into the atmosphere.

We appreciate the opportunity to comment on the cap-and trade auction proceeds second investment plan draft. If you need additional information or would like to discuss further these comments, please do not hesitate to contact Dr. Kim J. Tran at (213) 485-3522.

Sincerely,



ENRIQUE C. ZALDIVAR, Director  
LA Sanitation

ECZ/KJT:phn

- c: Kevin James, Board of Public Works
- Heather Repenning, Board of Public Works
- Greg Good, Mayor's Office
- Matt Petersen, Mayor's Office
- Ted Bardacke, Mayor's Office
- LASAN Executives
- LASAN Division Managers
- Doug Walters, LASAN
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