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COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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IN REPLY PLEASE

REFER TO FILE: **EP-4**

December 15, 2016

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

Dear Ms. Nichols:

COMMENTS ON 2030 TARGET SCOPING PLAN UPDATE DISCUSSION DRAFT

The Los Angeles County Department of Public Works (Public Works) appreciates the opportunity to comment on the 2030 Target Scoping Plan Update Discussion Draft (Discussion Draft). Public Works supports the State's adoption of a post-2020 Cap and Trade Program and the establishment of a sustainable State funding source for the development of waste management infrastructure, programs, and incentives. Public Works is also supportive of the California Air Resources Board (ARB's) intentions to increase research, development, and deployment of low carbon fuels, such as renewable natural gas (RNG) and to promote taking advantage of available capacity at wastewater treatment plants that have digesters to process food waste. Public Works also supports ARB's intention to include economic modeling of the social cost of carbon in the January Proposed 2030 Target Scoping Plan (Proposed Scoping Plan). Public Works has several recommendations to include in the Proposed Scoping Plan:

- The Discussion Draft states on page 32 that State policies, programs, and actions can support, incentivize, and accelerate the efforts of local governments to develop locally generated renewable energy, infrastructure for alternative fuels, and waste-to-fuel projects. The Proposed Scoping Plan should include specific actions the State will take to promote the development of alternatives to landfills to process non-recyclable materials including non-combustion conversion technologies (CTs) in addition to biomass conversion and anaerobic digestion (AD). These actions may include working with other State Agencies, such as CalRecycle and the California Energy Commission to provide for diversion credit and renewable energy credit to make these alternatives more economically feasible compared to landfilling.

- The Discussion Draft discusses key sectors for which policies can be developed to reduce GHG emissions. The integrated strategy for GHG reduction across various sectors (page 35) includes the use of biomass, agricultural waste, manure, and organic waste as feedstocks for bioenergy, biofuels, and/or electricity. The feedstocks for bioenergy and biofuels should be expanded to include all carbon based materials in municipal solid waste (MSW).
- The definition of RNG on page 39 is limited to “pipeline-quality gas.” The uses of RNG are not limited solely to pipeline injection, but can also be used to create electricity, fuels, or chemicals. The definition of RNG in the Proposed Scoping Plan should be revised and expanded to acknowledge other potential markets as alternatives to fossil fuels, such as electricity, fuels, or chemicals.
- The “Known Commitments” for electricity listed on page 40 should include SB 1122, which requires electrical corporations to collectively procure at least 250 megawatts of cumulative rated generating capacity from developers of bioenergy projects.
- Although the use of zero emission vehicles (ZEVs) is important to transportation sustainability (pages 48 to 57), the development of biofuels should be a higher priority. This is because ZEVs have upstream GHG emissions, whereas biofuels can be produced with a negative carbon intensity. We believe the use of biofuels in the transportation sector will be critical to meeting the 2030 Statewide GHG reduction target.
- On page 52 of the Discussion Draft, ARB states a goal to conduct a lifecycle analysis of GHG emissions with lifecycle costs for pavement and large infrastructure projects. ARB should also conduct a lifecycle study of emission reduction strategies for the solid waste sector. This would allow ARB to develop specific programs and policies that are most effective in reducing GHG emissions from the solid waste sector. For example, recycling plays an important role in our integrated solid waste management system by reducing our dependence on current disposal options; however, without a complete environmental lifecycle analysis conducted by the State, it is not possible to measure the net impact in GHG emissions that result from recycling activities. By conducting a complete lifecycle analysis, ARB would be able to quantify GHG reduction potential for all recycling activities.
- The Proposed Scoping Plan should include the conversion of post-recycled MSW as a mechanism for GHG reductions. Even though it is not required by law at

this time, the Environmental Justice Advisory Committee recommends “not limiting the 2030 Target Proposed Scoping Plan to examining interventions and impacts until 2030, or even 2050.” The discussion on Waste Management (pages 69 to 75) supports biomass conversion, anaerobic digestion of food waste, and the development of facilities to handle organic waste and recyclables. While these strategies will increase diversion from landfills and reduce GHG emissions, they have limitations in that they can only process certain types of waste. Furthermore, not all materials can feasibly be recycled. CTs are a wide array of non-combustion thermal, biological, and chemical technologies capable of converting biomass and post-recycled residual solid waste into renewable energy, useful products, and renewable fuels. Numerous studies, including those conducted by the State of California, have confirmed that CTs provide significant benefits with regard to GHG emissions reductions, including reducing waste transportation, reducing landfill disposal, and displacing fossil fuels by producing fuel and energy. In February 2008, ARB’s Economic and Technology Advancement Advisory Committee (ETAAC) released a report noting that by conservative estimates, CTs have the potential to reduce annual GHG emissions by approximately five million metric tons of carbon dioxide equivalent (CO₂e) in California. The conversion of post-recycled MSW is essential to helping ARB achieve its goals to maximize diversion from landfills and develop a sustainable, low-carbon waste management system within California by 2030, as stated on page 73. MSW conversion is also essential to mitigating climate impacts beyond 2050.

- The goals for reducing GHGs from the Waste Management sector on page 74 include increasing production of renewable transportation fuels from AD of waste. The production of renewable transportation fuels can be substantially expanded by the inclusion of non-combustion thermal CTs in addition to AD.
- The potential measures to support GHG reductions from the waste management sector on page 75 should include increased bioenergy research. The bioenergy research should include a lifecycle comparison of different end uses of organic waste (biofuels, electricity, pipeline biogas, and compost), carbon and water savings from different soil amendments, and the cost effectiveness of GHG reductions per ton of CO₂e reduced for different organic waste diversion strategies.
- The list of potential measures to support GHG reduction from the Waste Management Sector on page 75 includes a goal to resolve issues of pipeline injection and grid connection to make renewable energy projects competitive. It is absolutely essential that these issues be addressed if RNG is to be developed

locally. The Proposed Scoping Plan should include specific actions the State will take to address the high costs of pipeline interconnection for biomethane. Without State action and support, local governments are unlikely to develop sufficient locally generated renewable energy and fuels to help meet the 2030 statewide GHG reduction target.

- Figure III-2 on page 88 shows the ideal scenarios of cumulative GHG reductions, but does not show specific expected reductions by each measure. The Proposed Scoping Plan should identify expected emissions reduction for each measure, including cap and trade expenditures.
- The Discussion Draft states on page 103 that ARB recommends that local governments aim to achieve a community-wide goal to achieve emissions of no more than six metric tons CO₂e per capita by 2030 and no more than two metric tons CO₂e per capita by 2050. This figure is more appropriate for use as a guideline pointing to what the Statewide average per capita emissions should be. However, just as local waste generation can vary significantly from one jurisdiction to another, depending on physical, social, and economic factors, local per capita emissions will also vary. As stated in the Discussion Draft, the State can assist local governments in establishing and achieving local goals by providing tools that local governments can use to estimate GHG emissions.
- The California Legislative Analyst's Office has stated that bioenergy and waste diversion are the most cost-effective measures for greenhouse gas (GHG) reduction. The Proposed Scoping Plan should include an economic analysis of these measures. In order to achieve the 2030 Statewide GHG reduction target, ARB should prioritize these cost-effective GHG reduction measures.
- The California recycling industry is very complex and extends well beyond California and U.S. boundaries. The Proposed Scoping Plan needs to consider environmental standards and practices of the foreign countries and/or states managing California's recyclable commodities, which may be substantially weaker than those in California. The Proposed Scoping Plan should make an effort to realistically represent the GHG impact of recyclables shipped to other countries and/or states in GHG emissions modeling.

Ms. Mary Nichols
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We respectfully request that the above suggestions be considered and incorporated in the Proposed Scoping Plan. Public Works would be pleased to participate in future stakeholder opportunities related to this plan. If you have any questions, please contact Mr. Carlos Ruiz at (626) 458-3501.

Very truly yours,

GAIL FARBER
Director of Public Works



 DANIEL J. LAFFERTY
Chief Deputy Director

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