



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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March 24, 2016

IN REPLY PLEASE

REFER TO FILE: **EP-4**

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

Dear Ms. Nichols:

COMMENTS ON DRAFT ALISO CANYON METHANE LEAK CLIMATE IMPACTS MITIGATION PROGRAM

The Los Angeles County Department of Public Works (Public Works) appreciates the opportunity to review and comment on the draft mitigation program. Public Works views the recommended approach set by the California Air Resources Board (CARB) to be reasonable and effective towards mitigating the climate impacts of the Aliso Canyon natural gas leak and to prioritize reductions of short-lived climate pollutants. Public Works is in agreement with the mitigation program's primary focus on reducing methane emissions from the agriculture (including dairy) and waste (landfill and wastewater) sectors as agricultural byproducts and waste disposal account for approximately 3-quarters of the State's methane emissions.

Public Works is the lead County Agency advising the Los Angeles County Board of Supervisors on waste management issues. In coordination with Los Angeles County Integrated Waste Management Task Force (Task Force), Public Works 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 10 million. For over a decade, Public Works has evaluated and promoted the development of conversion technology facilities as an alternative to landfilling of solid waste. In addition to diverting solid waste from landfill disposal, such facilities produce renewable energy (electricity, gaseous, or liquid fuels), reduce environmental impacts, such as greenhouse gas (GHG) emissions, and create local green-collar jobs. Together with technical consultants, Public Works has vetted various conversion technologies and recently published a report (attached) documenting the significant GHG reduction benefit of conversion technologies, which is in large part due to their ability to divert organic waste from landfill disposal and thereby prevent methane emissions.

There is a large need for funding for infrastructure to divert organic waste from landfills in order to reduce methane emissions. Public Works estimates that 2,630,000 tons of compostable organic waste generated in Los Angeles County is disposed each year, which would require hundreds of millions of dollars of new infrastructure to divert the material and capture the methane emissions from the decomposing organic waste. In addition to capturing the methane emissions, the production of biofuels from waste provides further emissions reductions through the decreased need of fossil fuels.

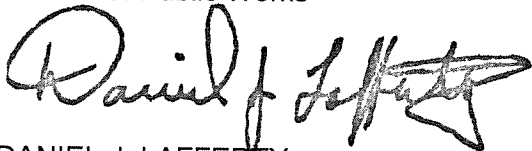
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Public Works would like to offer the following comments for consideration in developing a final mitigation plan:

- The mitigation plan should prioritize investments (at least 75 percent of the mitigation funds) towards methane reduction infrastructure projects within the vicinity of the natural gas leak to benefit the impacted residents. Public Works suggests a reasonable vicinity be within 50 miles. There are numerous potential multi-million dollar anaerobic digestion projects that are in need of funding within this vicinity.
- The mitigation plan should consider investments towards organic waste collection and separation programs in addition to the infrastructure investment. Organic waste collection and separation will be instrumental in providing adequate material to the infrastructure and ensure the most efficient operation possible in reducing methane emissions.
- The mitigation plan should achieve greater (or at least equivalent) reductions in methane than what has been released as a ton for ton basis, which alleviates the dispute over global warming potential in converting methane to carbon dioxide equivalent. A greater reduction than what was released would alleviate the harmful impacts to the residents within the vicinity. Third-party verification of tons of methane released should also be considered.

The Department of Public Works thanks you for your time and consideration of the above comments and looks forward to working with CARB to achieve full mitigation of the Aliso Canyon natural gas leak. If you have any questions, please contact Mr. Coby Skye of this Department at (626) 458-3550, Monday through Thursday 7 a.m. to 5:30 p.m.

Very truly yours,
GAIL FARBER
Director of Public Works

A handwritten signature in black ink, appearing to read "Daniel J. Lafferty", with a stylized flourish at the end.

DANIEL J. LAFFERTY
Assistant Deputy Director
Environmental Programs Division

PH:jl
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