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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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March 7, 2017

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

Dear Ms. Nichols:

COMMENTS ON THE 2017 CLIMATE CHANGE SCOPING PLAN UPDATE: THE PROPOSED STRATEGY FOR ACHIEVING CALIFORNIA'S 2030 GREENHOUSE GAS TARGET, DATED JANUARY 20, 2017

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 2017 Climate Change Scoping Plan Update: 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/2030sp_pp_final.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 following represents the Task Force's comments on the Proposed Plan:

General Comments:

- The Proposed Plan supports biomass conversion, anaerobic digestion (AD), composting, and recycling. While these technologies will increase diversion from landfills and reduce GHG emissions, they are limited to processing only certain

types of waste. Furthermore, not all materials can feasibly be recycled. 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. The conversion of post-recycled municipal solid waste (MSW) is essential to achieve the goals identified in the Proposed Plan, such as maximizing diversion from landfills, developing a sustainable, low-carbon waste management system, and mitigating climate impacts beyond 2050.

The Proposed Plan should be expanded to include the development of CT facilities as part of the goals for the Waste Management sector given their capability to handle a wide variety of wastes for which other processes, such as AD, composting, and recycling, may not be suitable. The Proposed Plan should also be expanded to include specific actions the State will take to facilitate the development of alternatives to landfills, including CTs, in addition to biomass conversion and AD.

Specific Comments:

- On page ES2 of the Plan a reference has been made to “a recent State report which noted among other observations that *“spring runoff volumes are declining as a result of diminished snowpack.”* The Task Force would appreciate being provided with a list of assumptions and analyses that were used by the State report to develop the list of observations noted. In addition, considering the amount of snow that the State has received this year, what impact(s) should one expect on the findings of the subject State study and why?
- On page ES6, paragraph 4 of the Plan a statement has been made that *“to date, over \$3 billion has been appropriated from the Greenhouse Gas Reduction Fund [GGRF], with approximately one third of the funding targeted to benefit disadvantaged communities.”* The Task Force strongly applauds this action by ARB. However, the Task Force has yet to see any allocation of the GGRF for the development of needed solid waste management infrastructure in Los Angeles County. This is especially disappointing considering the large population and urban nature of the County.
- The discussion on Transportation Sustainability (pages 98 to 108) emphasizes the need to transition the State’s transportation system to one powered by zero emission vehicles (ZEVs) and low carbon fuels. On page 103, there is a specific goal to reach 100 percent ZEV sales without any specific goal for low carbon fuels or near zero emission vehicles using carbon negative fuels. The development of low carbon fuels, such as biofuels, should have a specific goal and be prioritized over ZEVs in the Final Plan. ZEVs have upstream emissions whereas biofuels can be produced with a negative carbon intensity (emphasis added).

Ms. Mary Nichols

March 7, 2017

Page 3 of 4

- The goals of the Proposed Plan for the Waste Management sector (page 122) should be expanded to include conducting a lifecycle and cost-effectiveness study of emission reduction strategies for the solid waste sector (emphasis added). This would allow ARB to develop specific programs and policies that are most effective in reducing GHG emissions from the solid waste sector. An example would be to include a lifecycle comparison of different end uses of organic waste (biofuels, electricity, pipeline biogas, and compost) including carbon and water savings from different soil amendments and the cost effectiveness of GHG reductions per ton of CO_{2e} reduced for different organic waste diversion strategies.
- The Proposed Plan contains numerous goals for reducing greenhouse gas (GHG) emissions. The Proposed Plan should be expanded to include a more detailed discussion of the specific actions that would be implemented to achieve the Plan's goals, such as measures to:
 - Increase organics markets which complement and support other sectors (page 123). The expanded discussion on organics markets should consider the amount and type (woody, green, or other) of organics generated throughout the year. The discussion should consider where this organic material can be stored and how much space will be needed for storage of this material if it cannot be put on the market immediately. Organic material stored in piles can generate heat that could potentially cause fires and can also release GHGs. The discussion should also consider how storage of organic materials will comply with regulations by other agencies besides CalRecycle, such as the California Department of Food and Agriculture and the California Department of Forestry and Fire Protection.
 - Resolve issues of pipeline injection and grid connection to make renewable energy projects competitive (page 125).

We respectfully request that the above comments/issues be addressed in the Final Plan. 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.

Ms. Mary Nichols
March 7, 2017
Page 4 of 4

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