



March 24, 2016

The Honorable Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Draft Mitigation Plan for Aliso Canyon Gas Leak

Dear Chair Nichols:

The Bioenergy Association of California (BAC) appreciates this opportunity to comment on the draft Mitigation Plan for Aliso Canyon. BAC strongly supports the Plan's focus on reducing methane emissions from organic waste and dairies, which will provide the most significant benefits for the climate and the environment of any possible mitigation measures. Investing in these methane reductions will help to meet the state's Short-Lived Climate Pollutant, waste reduction, clean energy, low carbon fuel and air quality goals. Investing in bioenergy from organic waste can also provide immediate benefits to disadvantaged communities.

The Bioenergy Association of California represents more than 50 public agencies, private companies, local governments, environmental groups and others working to convert organic waste to energy, including low carbon fuels, renewable power and pipeline biogas. BAC represents members across the state, including both the Los Angeles County Sanitation Districts and the Los Angeles County Department of Public Works, as well as many wastewater treatment facilities and companies developing bioenergy projects.

Focusing the Aliso Canyon mitigation funding on methane reductions from solid waste and dairies will provide immediate and significant benefits:

- Immediate reductions of methane from organic waste and dairy manure;
- Production of carbon negative transportation fuels, the lowest carbon fuels of any kinds;
- Production of renewable biogas for pipeline injection, electricity generation, heating, cooling and other end uses;
- Immediate benefits for air quality by displacing diesel emissions from

- heavy duty vehicles;
- Benefits to disadvantaged communities from reduced air and water pollution, job creation and economic development;
- Landfill diversion; and
- Reduction of air, water and odor pollution from dairies.

In order to maximize these benefits, particularly in the community that was directly impacted by the Aliso Canyon gas leak, BAC urges the Air Board to clarify the goals of the mitigation plan in a few important ways:

1. Most Mitigation Funding Should Be Spent in the Community and County that Were Directly Impacted by the Leak.

BAC agrees with the Comments of the Los Angeles County Department of Public Works (LADPW) and others that most of the mitigation funding should be invested in the community that was directly impacted by the gas leak, meaning Los Angeles County. There is more than enough need for methane mitigation in Los Angeles County, and focusing most of the mitigation funding there will also provide the greatest benefits for disadvantaged communities.

As LADPW noted, Los Angeles County produces several million tons of organic waste annually, which is currently landfilled outside the county. That waste can, instead, be converted to carbon negative transportation fuels and used in ultra-low NOx heavy duty vehicles. Investing in organic waste diversion projects that convert the waste to transportation fuel will provide the greatest climate and air quality benefits possible. These investments will also help to meet the organic waste diversion goals in the Short-Lived Climate Pollutant Strategy and other state policies.

2. The Draft Plan Correctly Prioritizes Investments in Disadvantaged Communities.

We also support the Air Board's proposal to focus much of the mitigation funding on disadvantaged communities, which would benefit enormously from investments in facilities that convert organic waste to transportation fuels and the ultra-low NOx trucks that run on those fuels. Since heavy duty trucks are the single largest source of NOx and toxic air contaminants in Los Angeles County, investing in cleaner fuels and vehicles would provide significant and immediate benefits to public health that should be focused on the most impacted areas of the County.

In addition to the public health benefits, investments in biogas production will create jobs and economic development. According to U.C. Berkeley, investments in biogas generate two to six times as many jobs as natural (fossil fuel)¹ gas and those jobs will be created in the communities where projects are located. Instead of exporting its waste out of the county, Los Angeles will be able

¹ <http://www.rael.berkeley.edu/greenjobs>.


to convert it to a valuable resource that provides environmental benefits and economic development right in the county.

3. Investments in Agriculture Should Focus on Dairy Digesters.

To the extent that mitigation funding is invested in the agricultural sector, it should be focused on converting dairy waste to biogas for use as a transportation fuel, pipeline injection or renewable power generation. Converting dairy methane to energy provides the greatest possible reductions in climate pollution and can also provide organic byproducts that can be used as organic soil amendments. When converted to transportation fuel, dairy biogas provides the lowest carbon fuel of any kind, recently certified by the Air Board as having a carbon intensity of $-276 \text{ gCO}_2\text{e/MJ}$. In order to boost production and use of dairy biogas as a transportation fuel and for other energy uses, California will need to invest significantly in the development of dairy digesters, pipeline interconnection and ultra-low NOx natural gas vehicles that run on the biogas.

Thank you again for the opportunity to comment on the draft Mitigation Plan. With the clarifications described above, we believe that the mitigation funding will provide immediate methane reductions and numerous other benefits. While most of the mitigation funding should be invested close to the Aliso Canyon leak, the benefits of those investments will be statewide and beyond.

Sincerely,

A handwritten signature in cursive script that reads "Julia A. Levin".

Julia A. Levin
Executive Director