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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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September 13, 2021

Ms. Liane M. Randolph, Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Ms. Randolph:

COMMENTS ON THE DRAFT CAP-AND-TRADE AUCTION PROCEEDS FOURTH INVESTMENT PLAN FOR FISCAL YEARS 2022-23 THROUGH 2024-25 AND THE WORKSHOP HELD ON SEPTEMBER 2, 2021

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on California Air Resource Board's (CARB) Draft Cap-and-Trade Auction Proceeds Fourth Investment Plan for Fiscal Years 2022-23 through 2024-25 (Fourth Investment Plan) and the Workshop held on September 2, 2021.

The Task Force strongly encourages CARB to prioritize investments that reduce Short-Lived Climate Pollutants (SLCP), which is consistent with many comments provided by other attendees at the workshop. Many of the metrics and initiatives that CARB is mobilizing through public participation and proposing to fund in the Fourth Investment Plan are important, but they will not immediately benefit the climate. According to reports prepared by the Intergovernmental Panel on Climate Change, we are running out of time to avert catastrophic and irreversible climate change. If not immediately addressed, the rate of change will accelerate over the next two decades. It is critical to immediately bend the global warming curve by funding programs that help achieve carbon neutrality before mid-century.

Reducing emissions of methane, a powerful SLCP is one of the greatest opportunities available to positively address climate change and reduce pollution. One way to reduce methane is by diverting organic waste from landfills. The Task Force encourages CARB to prioritize funding specifically for the proper management of urban, agricultural, and forest organic waste, which will significantly reduce methane emissions. CARB should financially assist the development of desperately needed infrastructure such as

Organic Waste Management Facilities/Projects to reduce landfill disposal of organic waste by 75 percent by 2025, as mandated by SB 1383 (2016).

Organic waste management projects while providing for reduction of methane gas sources, have the added benefit of generating carbon negative biomethane and electricity that can be used to replace fossil-based energy sources including diesel, which is by far the largest source of air pollution in the San Joaquin Valley and the South Coast Air Quality Districts. CARB should provide funding for projects that replace heavy-duty diesel vehicles with low NOx near zero emission vehicles that run on carbon-negative biomethane from organic waste. This interim support for low NOx near zero emission vehicles would help immediately get heavy-duty diesel vehicles off the road to reduce air pollution and improve public health, while heavy-duty zero emission vehicle technologies continue to improve.

Assistance for low NOx near zero emission vehicles would also support the organic waste diversion goals of SB 1383, which requires jurisdictions to procure and use products like Biomethane produced from the processing of organic waste. In addition to composting and anaerobic digestion to process organic waste, additional investment is needed in other burgeoning alternative technologies that produce low carbon fuels and energy from organic materials and reduce greenhouse gases. Funding from the Cap-and-Trade program can play a big role in supporting the development of these technologies.

Properly managing organic waste and using it to generate fuels and electricity that can replace fossil sources will help combat climate change while stimulating the economy and creating new jobs. It also will help the State achieve its environmental goals related to air pollution, Greenhouse Gas reduction, and organic waste diversion.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939), 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 and 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, waste management industry, environmental groups, the public, and a number of other governmental agencies.

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On behalf of the Task Force, I strongly encourage CARB to consider the immediate need to bend the curve on climate change when developing/adopting the final Fourth Investment Plan for Fiscal Years 2022-23 through 2024-25. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Council Member, City of Rosemead

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cc: Richard Corey, Executive Officer, California Air Resource Board
Each Member of the California Air Resource Board
Rachel Wagner, Director, CalRecycle
California State Association of Counties
League of California Cities – Los Angeles County Division
Each Member of the Los Angeles County Board of Supervisors
Fesia A. Davenport, Los Angeles County Chief Executive Officer
Gateway Cities Council of Governments
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Westside Cities Council of Governments
Each City Mayor and City Manager in the County of Los Angeles
Each City Recycling Coordinator in the County of Los Angeles
Each Member of the Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force