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SOLID WASTE MANAGEMENT COMMITTEE/
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July 7, 2016

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

Dear Ms. Nichols:

**COMMENTS ON 2030 TARGET SCOPING PLAN UPDATE CONCEPT PAPER –
DATED JUNE 17, 2016 - CALIFORNIA AIR RESOURCES BOARD**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express our appreciation to the California Air Resources Board (ARB) for providing the 2030 Target Scoping Plan Update Concept Paper (Concept Paper) for public comment. A link to the Concept Paper is provided below:

http://www.arb.ca.gov/cc/scopingplan/document/2030_sp_concept_paper2016.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 relating to the Concept Paper:

General Comment:

The Concept Paper has been prepared pursuant to the Governor's Executive Order No. B-30-15. The Executive Order requires a reduction in greenhouse gas (GHG) emissions of 40 percent below 1990 levels. However, Assembly Bill 32 (2006) specifically

aims to reduce statewide emissions to 1990 levels 2020. AB 32 further requires ARB to “make recommendations to the Governor and the Legislature on how to continue reductions of greenhouse gas emissions beyond 2020,” which implies that further GHG emission reduction goals need reauthorization by the Legislature. This analysis is also substantiated by the Legislature’s legal counsel that the law “does not authorize ARB or the governor to set an emissions limit after 2020 that is lower than” AB 32’s 1990 target level. As such, the Task Force respectfully requests that this critical issue be addressed by the State (Administrative, Legislative & Judicial Branches) prior to ARB embarking on emission levels that are below 1990.

Specific Comments:

- Notwithstanding the above General Comment, waste management is a focus area within the “pillars framework” for the 2030 strategy and was discussed in the previous 2013 Scoping Plan Update. However, waste management was not one of the GHG Reduction Focus Areas discussed during the Workshop. The Task Force recommends that Waste Management be added to the GHG Reduction Focus Areas in the Draft 2030 Target Scoping Plan (Draft Scoping Plan), projected to be developed in late summer 2016. Waste management was one of the six sectors discussed in the 2013 Scoping Plan Update, and it is critical to prioritize waste management to reach the 2030 and 2050 GHG emissions reduction goals.
- In order to achieve the 2030 target, ARB must prioritize cost-effective GHG reduction measures. The solid waste sector offers cost-effective opportunities for GHG reduction. Therefore, ARB should conduct a life-cycle study of emissions reduction strategies for the solid waste sector, as well as identify any significant co-benefits. This would allow ARB to develop more specific programs and policies for reducing GHG emissions from the solid waste sector.
- The Task Force strongly supports recycling as an important element of our integrated solid waste management system, and recognizes its value in reducing our dependence on current disposal options. However, without a complete economic and environmental life-cycle analysis ever being conducted by the State, it is not possible to measure the net impact in GHG emissions that result from recycling activities. As such, the Task Force strongly recommends that ARB conduct a complete life-cycle analysis in order to quantify GHG reduction potential for all recycling activities.
- The California recycling industry is very complex and extends well beyond California and U.S. boundaries. The Draft Scoping Plan needs to consider environmental laws and regulations of the foreign countries and/or states managing California’s recyclable commodities, which when compared to California

regulations, may be considered weak or non-existent. The Draft Scoping Plan should acknowledge that if recyclables are shipped to other countries and/or states the net impact on both GHG emissions and other environmental impacts may be worse. It should also be recognized that there are no jurisdictional boundaries that would limit the movement of air contaminants (including GHG emissions) from other countries and/or states to California, which can negatively impact our air quality and our residents' wellbeing. Thus, in addition to conducting a complete life-cycle analysis for recycling activities, the Task Force believes it is critical for the State to take the lead in developing local and statewide markets for recyclables.

- Extended producer responsibility is essential to reducing manufacturing waste, energy consumption, and GHG emissions. The Task Force supports including an analysis of potential GHG emission reductions associated with extended producer responsibility in the Draft Scoping Plan. Such an analysis would help inform decision makers contemplating implementation of extended producer responsibility programs, which have the potential to impact all aspects of our integrated solid waste management system.
- The Task Force, along with the County of Los Angeles and many other jurisdictions throughout California, has been a strong supporter of conversion technologies and has played a major role in evaluating and promoting their development. Conversion technologies refer to a wide array of biological, chemical, thermal (excluding incineration) and mechanical technologies capable of converting biomass and post-recycled residual solid waste into renewable energy, useful products, and green fuels. Numerous studies, including those conducted by the State of California, have confirmed that conversion technologies 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 addition, conversion technologies provide an opportunity to increase the number of green-collar jobs in the State of California and thus, should be described in the Draft Scoping Plan as a mechanism to reduce GHG emissions.

We respectfully request that the above comments/issues be addressed in the Draft Scoping 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
July 7, 2016
Page 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

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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