



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, California 95812-2815

Dear Ladies and Gentlemen:

Comments on Proposed Amendments to California's Existing Regulation for the Mandatory Reporting of Greenhouse Gas Emissions

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate this opportunity to comment on CARB's proposed amendments to the existing Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. The Sanitation Districts provide environmentally sound, cost-effective wastewater and solid waste management for about 5.7 million people in Los Angeles County and, in the process, convert wastes into resources such as reclaimed water, energy, and usable recycled materials. The Sanitation Districts' service area covers approximately 800 square miles and encompasses 78 cities and unincorporated territory within the County through a partnership agreement with 23 independent special districts. The Sanitation Districts have also played a significant role over the years reducing air emissions and developing many state-of-the-art emissions controls and programs for our solid waste management and wastewater treatment operations that are now industry standards.

The Sanitation Districts support the goals of the proposed regulation: streamlining reporting for facilities subject to both the state and federal regulations, potentially reducing the time and costs, and developing consistent greenhouse gas data across government programs. We do, however, have some concerns with the proposed regulation and provide the following comments and recommendations.

The proposed regulation lowers the reporting threshold from 25,000 metric tons CO₂e to 10,000 metric tons, and also includes biogenic CO₂ emissions, which are excluded from the federal applicability threshold. Biogenic emissions from landfill gas, digester gas or other carbon-neutral fuel combustion are part of the natural "short-term" carbon cycle that do not add new carbon to the atmosphere but rather just return it to where it originated. Furthermore, these biogenic emissions do not count towards an entity's compliance obligation under the proposed Cap-and-Trade Regulation and will not be assessed for material misstatement by the verification

team under this proposed regulation. The proposed regulation contains an abbreviated reporting process for facilities emitting less than 25,000 metric tons CO₂e per year. In addition, third-party verification would not be required for these facilities. The primary purpose of the rigorous reporting and verification is to support the cap-and-trade program. The Sanitation Districts recommend that the regulation language be modified to allow all facilities without compliance obligations under the Cap-and-Trade Regulation to report under the abbreviated reporting requirements and not be subject to third-party verification requirements. This would allow the Air Resources Board to monitor greenhouse gas emissions that are outside the cap-and-trade program while minimizing the costs for facilities without cap and trade compliance obligations.

There are two definitions in the proposed regulation that we believe need modification:

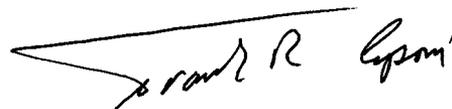
Fossil Fuels – the definition in the proposed regulation is an outdated definition taken from the U.S. EPA mandatory reporting regulation. We recommend that the definition be changed to the current definition in the federal regulation:

Fossil fuel means natural gas, petroleum, coal, or any form of solid, liquid, or gaseous fuel derived from such material, for purpose of creating useful heat.

Greenhouse Gas – the term “hydrocarbons” appears to be a typographical error and should be removed from this definition.

The Sanitation Districts appreciate the opportunity to comment on the proposed Regulation.

Very truly yours,
Stephen R. Maguin



Frank R. Caponi
Supervising Engineer
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