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SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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March 15, 2010

Mr. Wes Ingram  
Stationary Source Division  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Dear Mr. Ingram:

**COMMENTS REGARDING THE DRAFT PROCEDURES AND GUIDELINES FOR ESTABLISHING NEW FUEL PATHWAYS UNDER THE CALIFORNIA LOW CARBON FUEL STANDARD FOR REGULATED PARTIES, DATED JANUARY 20, 2010**

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), I would like to comment on the Draft Procedures and Guidelines for Establishing New Fuel Pathways under the California Low Carbon Fuel Standard (Draft Guidelines). The Draft Guidelines describe the process that fuel providers must follow when reporting the carbon intensity of their fuel to the California Air Resources Board (ARB), as required under the Low Carbon Fuel Standard.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 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 its 88 cities in Los Angeles County with a combined population in excess of 10 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, the County of Los Angeles Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

Table 1 (page 24-26) of the Draft Guidelines names various examples of biomass that may be utilized in the production of low carbon fuels. It is not clear; however, whether the examples listed would be considered by the ARB as the only eligible fuels/feedstock. Therefore, the Task Force requests that the Guidelines be clarified to note

Mr. Wes Ingram  
March 15, 2010  
Page 2

that any biomass/organic waste materials otherwise destined for landfills, such as Municipal Solid Waste (MSW), may be utilized by a variety of technologies to produce a range of low carbon fuels *with little or no indirect land use impacts*.

The Task Force along with other entities, including the City and the County of Los Angeles, have extensively evaluated conversion technologies from around the world, and concluded that there exist technologies that can successfully operate within California's stringent regulatory environment and can fundamentally change the way we manage waste. These technologies have the potential of diverting up to 100 percent of the waste from landfill disposal, producing significant quantities of renewable energy and biofuels from that waste, preventing emissions - including greenhouse gas emissions - that otherwise would have been produced, and most significantly, creating high-tech green collar jobs. Post-recycled residual MSW is a versatile feedstock that can be utilized to produce electricity and an array of biofuels including ethanol, biodiesel, and hydrogen.

We appreciate your consideration of our comments and we look forward to working with you in realizing our mutual goal of a more sustainable California. Should you have any questions, please contact Mr. Mike Mohajer of the Task Force 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: Assembly Member Anthony Adams  
Assembly Member Fiona Ma  
California Air Resources Board (Mary Nichols)  
California Department of Resources Recycling and Recovery (Margo Reid Brown)  
Each Member of the Los Angeles County Integrated Waste Management Task Force  
Each Member of the Alternative Technology Advisory Subcommittee