



GAIL FARBER, CHAIR
MARGARET CLARK, VICE - CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org

July 27, 2016

The Honorable Kevin de León, Chair
Senate Committee on Rules
State Capitol, Room 400
Sacramento, California 95814

Dear Senator de León:

**ASSEMBLY BILL 2206 (AMENDED JUNE 27, 2016) – SUPPORT IF AMENDED:
RENEWABLE GAS**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) is pleased to **support** the June 27, 2016 version of **Assembly Bill 2206 (AB 2206), if amended**. AB 2206 would require the California Air Resources Board (ARB), in coordination with the Public Utilities Commission (CPUC) and State Energy Resources and Conservation Development Commission, to consider and, as appropriate, adopt policies or programs to increase the production and use of renewable gas generated by an eligible renewable energy resource that meets the requirements of the California Renewable Portfolio Standard Program or by direct solar energy.

The Task Force has been a longstanding supporter of legislation that seeks to advance the use of renewable energy and low carbon fuels, reduction in air pollution, and landfill diversion, among other things. The Task Force recommends re-inserting language that was removed from the bill in the June 27, 2016, amendment to request the California Council on Science and Technology (CCST) to complete a study analyzing issues specific to minimum heating value and maximum siloxane specifications for biomethane prior to its injection into common carrier gas pipelines. If the bill is revised and enacted, the results from the requested study would be used by CPUC to reevaluate those specific standards and adopt them if necessary.

Furthermore, the previous version of the bill, as amended June 14, 2016, called for the CCST study to evaluate the standards held by other states for the dilution of biomethane post-injection, cost implications, volume sold, public safety, and whether different sources of biogas should have different standards. Currently, the existing pipeline regulatory requirements for biomethane make pipeline injection cost-prohibitive and are not in parity with natural gas pipeline injection or surrounding state's injected biomethane. The results of the CCST study would bolster the intent of AB 1900 (Gatto, 2012) to facilitate and promote the use of biogas for transportation in addition to

Senator de León

July 27, 2016

Page 2

electricity and other end uses. The Task Force recommends that this language, which was removed from the bill in the June 27, 2016 amendment, should be re-inserted.

In addition, the proposed Section 39734 (c) of the bill calls for ARB, in adopting policies or programs to increase the production and use of renewable gas, to ensure that eligible renewable gas provides direct benefits to the state's environment by reducing or avoiding emissions of criteria pollutants, emissions that adversely affect the waters of the state, and nuisances associated with the emission of odors. The Task Force recommends that this section be amended to require ARB, in adopting such policies or programs, to also ensure public health and safety.

The Task Force also recommends adding language to the bill adjusting the definition of biomass to include organic by-products or residue from anaerobic digestion, otherwise known as digestate. This will encourage the development and use of sustainable management of the digestate to produce renewable gas via conversion technologies.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [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 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.

Based on the reasons outlined above, the Task Force would like to **support the June 27, 2016 version of AB 2206, if amended** to address the foregoing. If you have any questions, please contact Mr. Mike Mohajer, a Member of the Task Force, at MikeMohajer@yahoo.com or (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

Senator de León

July 27, 2016

Page 3

cc: Assembly Member Das Williams
Each Member of the Senate Committee on Rules
California State Association of Counties
League of California Cities – Los Angeles County Division
Each member of the Los Angeles County Board of Supervisors
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Gateway 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 Los Angeles County
Each Member of the Los Angeles County Integrated Waste Management Task Force