



GAIL FARBER, CHAIR
MARGARET CLARK, VICE-CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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March 12, 2013

Ms. Mary Nichols, Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Chairperson Nichols:

COMMENTS REGARDING 2013 UPDATED AB 32 SCOPING PLAN

In January 2013 the California Air Resources Board (CARB) released its first annual report to the legislature which included a semi-annual AB 32 program update. One of the AB 32 support activities discussed in the semi-annual report is the five year update to the AB 32 Scoping Plan. On behalf of the Los Angeles County Integrated Waste Management Task Force (Task Force), I would like to take this opportunity to provide the following comments for your consideration and action when preparing the updated scoping plan for 2013.

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 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, the Los Angeles County Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

We respectfully request your consideration of the following comments in order to provide additional context and details to the Updated Scoping Plan's recommendations regarding Recommended Measure No.15 - Recycling and Waste:

- 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 conducted by the State, it is not possible to measure the net impact in Greenhouse Gas (GHG) emissions that result from recycling activities. As such, the Task Force strongly recommends that CARB, in concert with the CalRecycle, through the use of factual and verifiable data, conduct a complete life-cycle analysis on all recycling activities in order to quantify GHG reduction potential for all recycling activities. We appreciate the Scoping Plan recognizing that economic studies are planned to investigate the potential for commercial recycling; however, we would still request that the Updated Scoping Plan acknowledge the importance of a full lifecycle analysis on all recycling activities.
- The California recycling industry is very complex and extends well beyond California and U.S. boundaries. The Updated Scoping Plan needs to consider environmental laws and regulations of the foreign countries managing California's recyclable commodities, which when compared to California regulations, may be considered weak or non-existent. We noted the Scoping Plan acknowledges that most GHG reductions from commercial recycling will occur outside of California, making accounting more difficult. However, the Scoping Plan does not acknowledge that if recyclables are shipped to other countries 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 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.
- 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 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 triple 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, supporting CARB's goal to protect our environment while spurring economic development we so urgently need right now.

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The Task Force was pleased to see the addition of anaerobic digestion to the recommended Recycling and Waste Management measures, recognizing the environmental benefits of biologically converting waste rather than disposing it; however, the Updated Scoping Plan should acknowledge that these benefits can be derived from all conversion technologies, and should promote them on a level playing field based on their actual performance, rather than selecting one technology winner. The Task Force looks to the Scoping Plan as a guidance document for the state, and as such requests that the scoping planning include research on emissions from recycling, composting and landfilling facilities and how they compare with emissions from operating conversion technology facilities. The Task Force believes this is an excellent opportunity to support clean, green, and proven technologies such as the ones mentioned above.

The Task Force looks forward to the opportunity to work with CARB and other appropriate agencies to ensure an environmentally and economically viable integrated waste management system that is protective of our citizens' health and safety as well as our natural resources and the environment. If you have any questions, please contact Mr. Mike Mohajer 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: CalEPA (Matt Rodriguez, Secretary)
California State Association of Counties
CalRecycle (Caroll Mortensen, Director)
Each City Mayor in the County of Los Angeles
Each Member of the Alternative Technology Advisory Subcommittee
Each Member of the California Air Resources Board
Each Member of the Los Angeles County Board of Supervisors
Each Member of the Los Angeles County Integrated Waste Management Task Force
Gateway Cities Counsel of Governments
League of California Cities
South Bay Cities Council of Governments
San Gabriel Valley Council of Governments
Southern California Association of Governments