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October 17, 2017

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

Dear Ms. Nichols:

COMMENTS ON THE OCTOBER 12, 2017 PUBLIC WORKSHOP ON THE 2017 SCOPING PLAN UPDATE – THE PROPOSED STRATEGY FOR ACHIEVING CALIFORNIA'S 2030 GREENHOUSE GAS TARGET

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express its appreciation to the California Air Resources Board (ARB) for the opportunity to provide comments on the October 12, 2017 Public Workshop on "The 2017 Climate Change Scoping Plan: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target" (Proposed Plan).

https://www.arb.ca.gov/cc/scopingplan/meetings/101217/sp-october-workshop-slides.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 Task Force has several recommendations to include in the Full Final Scoping Plan (Final Plan) and Final Environmental Analysis (Final EA) to be released in November 2017:

General Comments:

- The Final EA or Final Plan should quantify and compare the emissions, health, and economic impacts of different end uses of organic waste, including biofuels, electricity, pipeline biogas, and compost.

- The Proposed Plan supports biomass conversion, anaerobic digestion (AD), composting, and recycling. While these technologies will increase diversion from landfills and reduce greenhouse gas (GHG) emissions, they are limited to processing only certain types of waste. Furthermore, not all materials can feasibly be recycled. Conversion technologies (CTs) are a wide array of non-combustion thermal, biological, and chemical technologies capable of converting post-recycled residual solid waste into renewable energy, renewable fuels, and/or useful products. The conversion of post-recycled municipal solid waste (MSW) is essential to achieve the goals identified in the Proposed Plan, such as maximizing diversion from landfills, developing a sustainable, low-carbon waste management system, and mitigating climate impacts beyond 2050.

  Therefore, the Final Plan should be expanded to include the development of CT facilities as part of the goals to reduce GHG emissions from the Waste Management sector given their capability to handle a wide variety of wastes for which other processes, such as AD, composting, and recycling, may not be suitable. The Proposed Plan should also be expanded to include specific actions the State will take to facilitate the development of alternatives to landfills, including CTs, in addition to biomass conversion and AD.

  Furthermore, the Final Plan should consider and encourage all available technologies that can reduce GHGs from organic waste disposal, and not limit the alternative technologies to composting and AD only. Due to the recent passage of legislation such as Senate Bill 1383 (Lara, Chapter 395 of the 2016 State Statutes), which sets ambitious goals for organic waste disposal reduction, CalRecycle needs to look beyond these two processes to thermal CTs in order to significantly increase the rate of organic waste recycling and reduce GHG emissions from the Waste Management sector.

Specific Comments on the Proposed Plan:

- On page ES2 of the Proposed Plan a reference has been made to “a recent State report which noted among other observations that “spring runoff volumes are declining as a result of diminished snowpack.” The Task Force would appreciate being provided with a list of assumptions and analyses that were used by the State report to develop the list of observations noted. In addition, considering the amount of snow that the State has received this year, what impact(s) should one expect on the findings of the subject State study and why?

- On page ES6, paragraph 4 of the Proposed Plan a statement has been made that "to date, over $3 billion has been appropriated from the Greenhouse Gas Reduction Fund [GGRF], with approximately one third of the funding targeted to benefit disadvantaged communities." The Task Force strongly applauds this action by ARB. Although there has been some allocation of the GGRF for the development of needed organic solid waste management infrastructure in Los Angeles County and the surrounding region, much more investment is needed to develop sufficient organic waste processing infrastructure.

- The discussion on Transportation Sustainability (pages 98 to 108) emphasizes the need to transition the State's transportation system to one powered by zero emission vehicles (ZEVs) and low carbon fuels. On page 103, there is a specific goal to reach 100 percent ZEV sales without any specific goal for low carbon fuels or near zero emission vehicles using carbon negative fuels. The development of low carbon fuels, such as biofuels, should have a specific goal and be prioritized over ZEVs in the Final Plan. ZEVs have upstream emissions whereas biofuels can be produced with a negative carbon intensity (emphasis added).

- The goals of the Proposed Plan for the Waste Management sector (page 122) should be expanded to include conducting a lifecycle and cost-effectiveness study of emission reduction strategies for the solid waste sector (emphasis added). This would allow ARB to develop specific programs and policies that are most effective in reducing GHG emissions from the solid waste sector. An example would be to include a lifecycle comparison of different end uses of organic waste (biofuels, electricity, pipeline biogas, and compost) including carbon and water savings from different soil amendments and the cost effectiveness of GHG reductions per ton of CO2e reduced for different organic waste diversion strategies.

- The Proposed Plan contains numerous goals for reducing GHG emissions. The Final Plan should be expanded to include a more detailed discussion of the specific actions that would be implemented to achieve the Plan's goals, such as measures to:

    - Increase organics markets which complement and support other sectors (page 122). The expanded discussion on organics markets should emphasize that a lack of organics markets has increased GHG emissions by causing more organic wastes to be disposed in landfills. The discussion should also need to consider the amount and type (woody, green, or other) of organics generated throughout the year.

      The discussion should specify where recycled/diverted organic materials for which there are no or insufficient markets will be stored. The discussion

should also address how much space will be needed for storage of these materials if they cannot be put on the market immediately.
Organic material stored in piles can generate heat that could potentially cause fires and can also release GHGs. The discussion should also consider how storage of organic materials will comply with regulations by other State regulatory agencies besides CalRecycle, such as the California Department of Food and Agriculture and the California Department of Forestry and Fire Protection. Furthermore, the discussion should analyze the impacts of increasing organics markets based on region. Throughout the State, the production of and demand for organic products varies greatly based on region.

- Resolve issues of pipeline injection of bio-gas and grid connection to make renewable energy projects competitive (page 124).

Specific Comments on the Draft Environmental Analysis (Draft EA):

- In describing the impacts of known commitments [beginning on page 12 of the Draft EA, the Final EA should compare the environmental impacts, including life-cycle GHG emissions, of the use of low carbon fuels as part of the Low Carbon Fuel Standard with the use of zero emission vehicles (ZEVs) as part of the Mobile Sources Strategy (Clean Technology and Fuels Scenario) and Sustainable Freight Strategy.

- Zero emission vehicles (ZEVs) use lithium batteries. As stated in the Draft EA, the increased use of ZEVs will result in an increased need for lithium battery manufacturing and recycling (page 23). Low-nitrous oxide (NOx) engines fueled by renewable natural gas (RNG) produced from solid waste will result in greater GHG reductions without producing additional hazardous waste in the form of batteries. For certain vehicle types, low-NOx engines using RNG may be a more effective than ZEVs for reducing GHG emissions. In the description of measures under the Mobile Sources Strategy (Clean Technology and Fuels Scenario) and Sustainable Freight Strategy, the Final EA should include a description of the benefits of using low-NOx engines for vehicles such as on-road heavy-duty vehicles (page 18).

- In the Draft EA, methane reduction measures under the SLCP Strategy (described on pages 61 and 97) and fugitive methane emissions reduction measures (described on page 151) include AD and composting. The methane reduction measures need to include thermal CT facilities. Thermal CTs are able to handle a wide variety of wastes, such as contaminated recyclables, medical waste, hazardous waste, or mixed materials such as goods made of more than one type of plastic, for which other processes, such as AD, composting, and recycling, may not be suitable.

- As stated in the Draft EA, the implementation of the Proposed Plan could result in an increased rate in turnover of vehicle fleets to increase the use of zero-emission technologies (page 149). The Draft EA also states that these vehicles would need to be recycled or shipped for use outside of California (page 150). The Final EA should include a statement that the use of RNG produced from solid waste will result in greater GHG reductions and produce less waste from existing fleets being replaced by ZEVs.

We respectfully request that the above comments/issues be addressed in the Final EA. 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.

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 Levenson, CalRecycle (Waste)
Kevin Barker, Pamela Doughman, and Michael Murza, California Energy Commission (Energy)
Jack Kitowski, California Air Resources Board (Transportation)
Amrith Gunasekara, California Department of Food and Agriculture (Agriculture)
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League of California Cities, Los Angeles County 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
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South Bay Cities Council of Governments
San Gabriel Valley Council of Governments
Gateway Cities Counsel of Governments

Southern California Association of Governments (Frank Wen)
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