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

GAIL FARBER, CHAIR
MARGARET CLARK, VICE CHAIR

October 20, 2010

Ms. Holly J. Shiralipour
RC&D Coordinator, South Coast Council
USDA-NRCS
4500 Glenwood Drive, Building "D"
Riverside, CA 92501

Dear Ms. Shiralipour:

THE U.S. DEPARTMENT OF AGRICULTURE (USDA) DRAFT BIOFUELS STRATEGIC PRODUCTION REPORT

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), I would like to offer the following comments on the "*USDA Biofuels Strategic Production Report: Regional Roadmap to Meeting the Biofuels Goals of the Renewable Fuels Standard by 2022*" (Draft Report), which was released for public comment June 23, 2010. In its current form, the Draft Report does not adequately discuss the full potential of municipal solid waste (MSW) as a feedstock for biofuel production.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989, 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 (approximately one third of the California population). 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.

The Energy Independence and Security Act of 2007 mandated through the U.S. Renewable Fuels Standard that the American economy incorporate 36 billion gallons of renewable transportation fuel per year in its transportation supply by 2022. The objectives of the Draft Report are to 1) provide practical knowledge from the field that can enhance various models for biofuels production, 2) identify challenges and opportunities, and 3) help develop solutions to this massive undertaking. Ultimately, the purpose of the Draft Report was identified to spur discussions and attract feedback from Congress, states, industry, science, and concerned citizens and stakeholders.

Below are the Task Force's responses to the Discussion Questions that were provided to stakeholders by the USDA:

1. **Are there potential sources of feedstock that USDA did not identify in this report that locally could contribute to expanded biofuels production?**

   Task Force Response: The Draft Report has a very limited discussion on the potential of MSW as a feedstock for biofuels production. According to the US EPA, over 135 million tons of solid waste is sent to landfills in the United States each year. This represents a plentiful resource that can be utilized to significantly diversify transportation fuels and energy resources.

   Burning biomass is not the only way to release energy from it. Together with the County of Los Angeles, the Task Force has evaluated hundreds of companies that utilize non-combustion conversion technologies to convert post-recycled residual solid waste into electricity and biofuels. Utilizing these technologies can produce significant quantities of biofuels from materials that would otherwise be disposed. In addition, conversion of solid waste could result in substantial net reductions of greenhouse gas emissions, through (1) reduction of transportation emissions resulting from long distance shipping of waste; (2) elimination of methane production from waste that would otherwise be landfilled; and (3) displacement of the use of fossil fuels by net energy (fuel and electricity) produced by conversion technologies.

2. **Do you feel USDA's feedstock assumptions and/or limitations are accurate? Is there information the report missed that could provide more accurate estimates?**

   Task Force Response: Because USDA opted to constrain the scope of this report, MSW is not discussed in any level of detail. Also, the Draft Report only cites the Northeast Region of the US as utilizing MSW as feedstock for biofuel production. In addition to Los Angeles County and numerous jurisdictions in California which represent the Western Region, we are familiar with projects in development in many other states, and the U.S. Department of Energy has

issued substantial grants and loans to projects located throughout the country for this purpose.

3. **Are there ways to harness current local infrastructure not considered in the report?**

   Task Force Response: Yes, through utilization of existing facilities. The Draft Report only considers feedstocks grown on crop and forest land. The Task Force in conjunction with the County of Los Angeles has extensively evaluated the utilization of material recovery facilities and transfer stations as host sites for conversion technology processes that would convert MSW into energy and biofuels. This pairing has many synergies such as 1) utilizing an extensive network of existing waste collection infrastructure that is already in place in every major city in the country; 2) direct access to plentiful and renewable feedstock; 3) land for development and appropriate zoning at existing sold waste facilities; 4) feedstock is material that would otherwise have been disposed and has a negative value (facility operators are paid to accept it); 5) environmental benefits, such as transportation avoidance, can be achieved by co-locating the conversion facility with an existing waste management facility; and 6) pre-processing capability, including preparation of solid waste materials for optimal conversion.

   Additionally, landfills, brown fields, and other industrial parcels could be utilized for conversion technology development.

4. **What are your views of the estimated land use needed in your area for biofuels?**

   Task Force Response: As discussed above, conversion technologies are a unique method of producing biofuels that do not utilize large amounts of crop or forest land. These facilities could be collocated with existing solid waste facilities or developed at landfills and brown fields, and therefore minimize or eliminate the need for additional dedicated acreage.

5. **How can the State or Federal Government agencies partner with the private sector to expand the demand for biofuels? Would such a plan push the private sector to meet the increased supply needs?**

   Task Force Response: In our experience, we have found that one of the key reasons conversion technologies have not been widely developed in the US is that the lack of regulatory structure and incentives in place. Without regulatory certainty, financial backers do not have the level of confidence needed to invest in project development.

6. **What can the government do to help expedite infrastructure improvement in the private sector?**

   Task Force Response: Streamlined regulations, consistent definitions among state and federal statutes, and clear incentives will greatly expedite the development of conversion technologies.

7. **Are there innovative state-based programs or incentives that have worked, and that the Federal government should consider copying nationwide?**

   Task Force Response: A program, similar to the Air Quality Improvement Program (AQIP), could be established on the Federal level. This program established by the California Alternative and Renewable Fuel, Vehicle Technology, Clean Air, and Carbon Reduction Act of 2007 (California Assembly Bill 118, Statutes of 2007, Chapter 750), is a voluntary incentive program administered by the California Air Resources Board (CARB) to fund clean vehicle and equipment projects, research on biofuels production and the air quality impacts of alternative fuels, and workforce training. On April 24, 2009, CARB adopted the AQIP Guidelines which establish the minimum administrative requirements for the program. The AQIP Guidelines require that CARB approve an annual Funding Plan which identifies program priorities, project categories and funding targets for each fiscal year.

8. **Are there further opportunities for expanding production capacity that should be added to the Report?**

   Task Force Response: Please see No. 6 above.

We urge the USDA to consider waste feedstocks, such as MSW, as an opportunity for biofuels and renewable generation. Utilizing MSW in conversion technology processes will reduce our dependence fossil fuel and landfills while promoting development of needed infrastructures as well as creating green jobs.

We appreciate the opportunity to comment on the Draft Report and look forward to working with the USDA in this effort to find new pathways for biofuels production in the US. If you have any questions, please Mr. Mike Mohajer of the Task Force at 909-592-1147 or MikeMohajer@yahoo.com.

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

TM/CS:kp
P:\SEC\Shiralipour 10-20-10 TF Letter to USDA

cc: Los Angeles County Congressional Delegation
Each Member of the County of Los Angeles Board of Supervisors
Each City Mayor and City Manager in the County of Los Angeles
County of Los Angeles Chief Executive Officer
South Bay Cities Council of Governments
San Gabriel Valley Council of Governments
Gateway Cities Council of Governments
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Alternative Technology Advisory Subcommittee