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COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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June 8, 2021

IN REPLY PLEASE

REFER TO FILE: **EP-4**

The Honorable Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

COMMENTS ON THE 2022 CLIMATE CHANGE SCOPING PLAN JUNE 2021 WORKSHOP PRESENTATIONS

Dear Honorable Randolph, Chair:

Los Angeles County Public Works appreciates the opportunity to provide comments on the 2022 Climate Change Scoping Plan presentations made at the June 8-10 workshops. Since the last Scoping Plan, the County of Los Angeles has adopted the nation's most ambitious regional sustainability plan, OurCounty, which envisions a fossil fuel free Los Angeles and achieving carbon neutrality. In that context, Public Works strongly supports the State's climate goals. Public Works submits this comment as part of the County's planned broader engagement on the 2022 Scoping Plan process.

Public Works is working diligently to implement organic waste collection and recycling programs as outlined in the Senate Bill (SB) 1383 regulations to achieve the State's Short-Lived Climate Pollutant (SLCP) reduction goals. We are concerned that there was not a greater emphasis on reducing SLCP or discussion of the many benefits of bioenergy and biofuels derived from organic waste in the Scoping Plan workshops.

Public Works provides trash collection services for 1.1 million unincorporated area residents and over 10,000 businesses, implements numerous waste diversion programs, provides disposal capacity planning, strategic planning, and is responsible for the implementation of various waste related regulations in unincorporated Los Angeles County, such as the SB 1383 organic waste reduction regulations.

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Given the mandate from the State to collect and recycle organic waste, the lack of adequate infrastructure to process organic waste, and the need for adequate markets for organic waste products like biofuels, biochar, and electricity, Public Works' recommendations for the Scoping Plan are as follows:

- 1. The Scoping Plan should continue to have a focus on SLCP reductions**
- 2. Include a discussion of bioenergy and biofuels from organic waste in the electricity and transportation sector chapters respectively**

Continuing to focus on SLCP reductions and including bioenergy and biofuels from organic waste in the Scoping Plan will help the State to achieve its various air quality, greenhouse gas reduction, and carbon neutrality goals, and is critical to:

- Meet the SLCP reduction requirements of SB 1383
- Provide immediate benefits to the climate that reduce global warming right away
- Provide carbon negative emissions needed to achieve carbon neutrality
- Provide extremely cost-effective carbon reductions
- Immediately reduce black carbon, toxic particulate matter, and smog forming emissions from diesel trucks and backup generators
- Provide renewable base load power, long-duration storage, and greater energy reliability

Thank you for your consideration of these comments. Public Works looks forward to working with the California Air Resources Board and other agencies to help the State achieve its many air quality, greenhouse gas reduction, carbon neutrality, and sustainability goals. If you have any questions, please contact Mr. Christopher Sheppard at (626) 458-3592 or csheppard@pw.lacounty.gov, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

MARK PESTRELLA, PE
Director of Public Works



COBY J. SKYE
Assistant Deputy Director
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