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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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May 25, 2016

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

Dear Ms. Nichols:

**COMMENTS ON THE PROPOSED SHORT-LIVED CLIMATE POLLUTANT (SLCP)
REDUCTION STRATEGY AND DRAFT ENVIRONMENTAL ANALYSIS RELEASED
FOR PUBLIC REVIEW ON APRIL 11, 2016**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express our appreciation to the California Air Resources Board (CARB) for providing the opportunity to comment on the Proposed Short-Lived Climate Pollutant Reduction Strategy (Proposed Strategy) and Draft Environmental Analysis (Draft EA). The Task Force would appreciate CARB's consideration of the following comments as a part of the Proposed Strategy finalization process:

- The Proposed Strategy recommends reducing organics deposited to landfills by 90 percent by 2025, which is inconsistent with AB 341 (Chapter 476 of the 2011 State Statutes). Further, the goal of 90 percent reduction of organic waste disposal by 2025 is far greater than full implementation of AB 1826 (Chapter 727 of the 2014 State Statutes), which requires 50 percent reduction in the amount of organic waste being disposed by 2020. For CARB to develop and adopt these goals and the Proposed Strategy with no legislative accountability is a dangerous precedent (emphasis added). While the Task Force believes CARB has good intentions for the State, implementing strategies that have not been vetted for efficacy, business climate, and cost, among other considerations, could amount to unintended consequences for the State's business climate while providing little to no benefit for residents. The Draft EA needs to address these impacts.
- According to the Proposed Strategy, approximately one hundred new facilities would need to be built in California in order to process the organic waste diverted to achieve this goal. Permitting and constructing a new organic waste processing facility in California can take five to ten years. According to the Proposed Strategy, the capital cost to build enough facilities to achieve 90 percent organics diversion is estimated at \$2 billion, which is not likely to be feasible by 2025 without changes

in State law and regulations to streamline permitting and CEQA processes; significant capital investment by the State, local government and private sectors; and market for the end products (compost and soil amendments). While the Task Force appreciates that these issues were acknowledged in the Proposed Strategy, it is still necessary for CARB to identify specific solutions for overcoming these barriers to achieving the 2020 and 2025 organic waste diversion goals.

- In acknowledging the need for additional organics processing infrastructure, the Proposed Strategy alludes to composting and anaerobic digestion. California does not have a large enough market for the compost and soil amendments that would be created from organic waste generated in the State. Although the Proposed Strategy outlines goals for increasing the market for compost and soil amendments, it should also discuss the importance of conversion technologies in achieving the State's SLCP reduction goals. Conversion technologies can be used to process the residual digestate from the anaerobic digestion process. Digestate can be composted; however, composting the significant volume of digestate produced from processing 90 percent of the State's organic waste will not be a sustainable solution. Furthermore, thermal non-combustion conversion of digestate can be used to create renewable fuel, resulting in additional SLCP emissions reductions.
- The Proposed Strategy totally lacks consideration of results of the recently implemented mandatory commercial recycling programs pursuant to AB 341 (2011) and the organic and food waste recycling as mandated by AB 1826 (2014). The Task Force strongly believes that before CARB and CalRecycle formulate new recycling rates for the year 2020 and year 2025, they need to evaluate the results of the programs stipulated by AB 341 and AB 1826 and then formulate the new goals for 2020 and 2025.
- The Proposed Strategy identifies public investments such as the Greenhouse Gas Reduction Fund (GGRF) as an incentive for early action to accelerate market transition to cleaner technologies. However, the Task Force questions the viability of the GGRF since it is subject to annual adjustment, reduction, and/or elimination by the Legislature and the Governor during the State Budget adoption process. In the interim, all State agencies should use long-term global warming potential values to measure the performance of projects receiving funding from the GGRF. Senate proposes cutting CalRecycle's GGRF funding in half.
- The Proposed Strategy identifies the Low Carbon Fuel Standard (LCFS) as an effective program to make projects that utilize organic waste to create transportation fuel profitable. CARB should expand on describing other programs and policies that will increase the volume of low carbon fuels produced in the

State, therefore maximizing the SLCP emissions reduction benefits resulting from the usage of transportation fuels derived from organic waste.

- For landfills, it is indicated that CARB will work with CalRecycle to develop a regulation by 2018 to effectively eliminate organic disposal in landfills by 2025. CARB should specify whether this regulation will apply to residential organic waste in addition to commercial organic waste. If this regulation intends to eliminate residential organic waste from landfills, CARB should provide comprehensive organic waste collection and diversion plans for jurisdictions to follow in order to comply with this regulation.

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, 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.

We respectfully request that these issues be addressed by CARB prior to adoption of the Final Short-Lived Climate Pollutant Reduction Strategy and Final Environmental Analysis.

Should you have any questions regarding these matters, 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
Mayor, City of Rosemead

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cc: California Air Resources Board (David Mallory, Michael Tollstrup)
CalRecycle (Scott Smithline, Christine Hironaka, Howard Levenson)

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League of California Cities
League of California Cities, Los Angeles Division
California State Association of Counties
Each Member of the Los Angeles County Board of Supervisors
Each City Mayor/Manager in the County of Los Angeles
South Coast Air Quality Management District (Wayne Nastri)
South Bay Cities Council of Governments
San Gabriel Valley Council of Governments
Gateway Cities Counsel of Governments
Southern California Association of Governments (Carl Morehouse and Huasha Liu)
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