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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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July 27, 2017

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

Dear Ms. Nichols:

**COMMENTS ON THE DRAFT STAFF REPORT ON THE PROPOSED UPDATE TO THE
SENATE BILL 375 GREENHOUSE GAS EMISSION REDUCTION TARGETS AND THE
DRAFT ENVIRONMENTAL ANALYSIS**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to review and comment on the California Air Resources Board's (ARB) Draft Staff Report on the Proposed Update to the Senate Bill 375 (Chapter 728 of the 2008 State Statutes) Greenhouse Gas Emission Reduction Targets dated June 2017 and the Draft Environmental Analysis (EA),

https://www.arb.ca.gov/cc/sb375/staff_report_sb375_target_update_june.pdf
https://www.arb.ca.gov/cc/sb375/appendix_e_draft_environmental_assessment.pdf

The Task Force would like to offer the following:

- Staff Report pg. 18-19: The Task Force recommends that the strategy areas analyzed by the Metropolitan Planning Organizations (MPOs) should consider the greenhouse gas (GHG) benefits of "near-zero" vehicles with low-NOx (nitrous oxide) engines powered by renewable natural gas (RNG) in addition to zero emission vehicles (ZEVs). The Task Force are supportive of the use of electric ZEVs, but ZEVs are not always entirely zero emission due to emissions that occur when the electricity is produced. According to ARB, California uses renewable resources for only about twenty-five percent of its electricity production. The majority of electricity is actually produced using emissions-heavy fossil fuels from sources in- and out-of-state.

The recently enacted Senate Bill 1383 (Chapter 395 of the 2016 State Statutes) requires jurisdictions in California to reduce the amount of organic waste being disposed by 50 percent by 2020 and 75 percent by 2025 through composting and anaerobic digestion processes as compared to the 2014 disposal rates. As such, we expect a significant increase in generation of biogas which can be used to generate electricity and/or RNG. Vehicles using RNG from the organic portion of solid waste have among the lowest complete emissions of any vehicle type. In fact, the

emissions are considered negative after factoring in the avoided emissions from less solid waste being disposed at landfills and generating emissions.

The use of near-zero vehicles can provide immediate GHG benefits, whereas the benefits of using ZEVs may not be seen for more than a decade at best. Deriving GHG emissions reduction from ZEVs is dependent on the renewable composition of the grid. Although SB 350 (Chapter 547 of the 2015 State Statutes) requires a 50 percent renewable portfolio by 2030, the state will continue to derive half its power from nonrenewable sources that produce emissions. Using low-NOx vehicles allows for significant GHG emissions reduction to be obtained immediately since this technology is not dependent upon the grid.

- Staff Report pg. A-10: The Southern California Association of Governments (SCAG) based their recommended GHG reduction target on an analysis which focused on strategies related to active transportation, ZEVs, mobility innovations, and further innovative strategies. The Task Force recommends that SCAG include the development and use of RNG from waste in near-zero low-NOx vehicles as a strategy to reach its GHG reduction target.
- The Staff Report needs to be expanded to include the vehicle registration surcharge fee and the additional \$0.12 gas tax which is imposed on every gallon of gasoline by SB 1 (Chapter 5 of the 2017 State Statutes) as well as an estimated additional \$0.63 per gallon which may result from Cap-and-Trade legislation (AB 398, Chapter 135 of the 2017 State Statutes) signed by the Governor on July 25, 2017. A portion of additional revenue generated should be allocated toward the expansion of existing and/or development of new anaerobic digestion infrastructure.

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 the ARB address these issues in the Final Staff Report and Final EA.

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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

cc: Matthew Rodriguez, Secretary of the Cal EPA
Each Member of the California Air Resources Board
David Mallory, California Air Resources Board
CalRecycle (Scott Smithline, Howard Levenson, Mark de Bie, Cara Morgan, Chris Bria & Graham Marshall)
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
Chief Executive Officer, County of Los Angeles
Each City Mayor/Manager in the County of Los Angeles
South Coast Air Quality Management District
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