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LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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June 19, 2018

The Honorable Bob Wieckowski, Chair  
Senate Committee on Environmental Quality  
State Capitol, Room 2205  
Sacramento, CA 95814

Dear Senator Wieckowski:

**OPPOSE UNLESS AMENDED ASSEMBLY BILL 3232 (FRIEDMAN) ZERO-EMISSIONS BUILDINGS AND SOURCES OF HEAT ENERGY – AMENDED MAY 29, 2018**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **opposes** Assembly Bill 3232 (AB 3232), as amended May 29, 2018, **unless amended** to address the concerns expressed in this letter.

AB 3232 requires the California Energy Commission (CEC) to assess the potential for the state to reduce the emissions of greenhouse gases in the state's residential and commercial building stock by at least 40 percent below 1990 levels by January 1, 2030.

As a proponent of measures that promote the expansion of renewable natural gas (RNG) markets, the Task Force is concerned that this bill seeks a large-scale transition away from gas to electric. This may significantly undermine efforts by the cities and counties to achieve the 75 percent organic waste disposal reduction mandated by Senate Bill 1383 (Lara – 2016) while limiting jurisdictions and industry efforts to develop markets for the needed infrastructure (at a cost in excess of \$3 Billion) for generation of renewable energy such as biogas/biomethane/biofuels for use in new and existing residential and commercial buildings.

The Task Force strongly requests the bill's mandated integrated energy policy reports assessment and analysis of the supply of energy by fuel type be specified to include assessment of the greenhouse gases produced by the total life cycle of each fuel type: Electricity produced from multiple sources including but not limited to coal, natural gas from fracking, and RNG from post diverted organic waste. This analysis ought to include not only the greenhouse gases from the actual production of electricity, but total life-cycle

analysis of the production of the fuel source such as through mining, transportation, and fracking which contribute additional greenhouse gases. In addition, the analysis for the use of solar energy must also consider the management of solar panels at the end of their useful life which currently, for most part, is limited to land disposal at a hazardous waste landfill. The analysis also needs to recognize that RNG can be made from a variety of feedstocks including post-diverted organic waste and can be considered carbon negative because it captures more greenhouse gases than it emits. The organic wastes contribute to greenhouse gas emissions if disposed in landfills or land applied decomposition, however these emissions can be eliminated when decomposition is contained in a vessel such as in a biochemical process like anaerobic digestion or a thermochemical means such as gasification.

The Task Force also requests the findings enumerated in Section 1, Subdivision (a), Paragraphs (2), (3), (4), and (6) of the proposed legislation include references for their source so they can be verified; such as “(3) Direct emissions from the combustion of fossil fuels in buildings, primarily for space and water heating, accounts for 10 percent of all emissions of greenhouse gases in California and “(4) Approximately half of all energy used in buildings in California is in the form of on-site combustion of fossil fuels.”

Furthermore, the Task Force requests that the term “significant” as used in Subdivision (b) of the proposed legislation be defined/quantified.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939), 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 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.

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Based on the foregoing, the Task Force **opposes** AB 3232 **unless amended** to address the concerns expressed in this letter. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at [MikeMohajer@yahoo.com](mailto: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 Pro Tem, City of Rosemead

EC:mq

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cc: Assembly Member Laura Friedman  
Assembly Member Richard Bloom  
Assembly Member David Chiu  
Assembly Member Mark Stone  
Assembly Senator Benjamin Allen  
Assembly Senator Henry Stern  
Each Member and staff of the Senate Environmental Quality Committee  
Committee on Environmental Quality Chief Consultant, Rachel Machi Wagoner  
California State Association of Counties  
League of California Cities – Los Angeles County Division  
Each member of the Los Angeles County Board of Supervisors  
Sachi A. Hamai, Los Angeles County Chief Executive Officer  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Gateway Cities Council of Governments  
Westside Cities Council of Governments  
Each City Mayor and City Manager in the County of Los Angeles  
Each City Recycling Coordinator in Los Angeles County  
Each Member of the Los Angeles County Solid Waste Management  
Committee/Integrated Waste Management Task Force