



MARK PESTRELLA, CHAIR  
MARGARET CLARK, VICE - CHAIR

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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July 30, 2019

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

Dear Ms. Nichols:

**COMMENTS ON THE DRAFT ORGANICS GRANT QUANTIFICATION METHODOLOGY (QM)**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to thank the California Air Resources Board (CARB) for the opportunity to comment on the Draft Organics Grant Quantification Methodology (QM) and the calculator for assessing Fiscal Year (FY) 2019-20 Greenhouse Gas Reduction Fund (GGRF) applications, which was released on July 16, 2019, for public comment.

<https://ww2.arb.ca.gov/resources/documents/cqi-quantification-benefits-and-reporting-materials?corr>

An electronic copy of this comment letter will be emailed to the following:

[GGRFProgram@arb.ca.gov](mailto:GGRFProgram@arb.ca.gov)

Comments:

- The QM and calculator quantify the greenhouse gas (GHG) emission reductions for four project types (composting, anaerobic digestion/co-digestion, edible food rescue, and food waste prevention) identified by CalRecycle that meet the objectives of the Organics Grant Program (OGP) and for which there are methods to quantify (GHG) emission reductions. Although other types of projects may be eligible for funding under the OGP, each project must incorporate at least one of the four specified project types. CalRecycle has not included biomass conversion, as defined in Public Resources Code 40106, as one of the project types eligible for

grant funding. The objective of the organics grant program is to lower overall GHG emissions by expanding capacity or establishing new facilities in California to reduce the amount of California-generated green materials, food materials, and/or green waste as Alternative Daily Cover being sent to landfills. The development of biomass conversion facilities will meet the objectives of the OGP by establishing new infrastructure capacity to process green materials that may otherwise be disposed of in landfills or used for Alternative Daily Cover. Biomass conversion facilities will also reduce GHGs from the management of green material by creating negative-carbon electricity or fuels to displace fossil-based energy. In addition, biomass conversion facilities can process other types of organic waste, such as wood waste and unrecyclable paper, that the proposed Senate Bill 1383 (SB 1383) regulations require local jurisdictions to divert from landfill disposal and that may not be able to be diverted through other methods. CalRecycle's SB 1383 Infrastructure and Market Analysis (dated April 29, 2019) states that California currently landfills 20-23 million tons of organic waste every year, but only has 4 million tons of existing permitted capacity which is currently available to process additional organic materials. CalRecycle should provide grant funding to any project types, including biomass conversion, that can divert organic waste from landfills and reduce GHG emissions. The QM and calculator should be updated to include formulas and tools to estimate emission reduction from biomass conversion projects.

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]), 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 within 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.

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The Task Force respectfully requests that CARB address these comments in the final QM and calculator. 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, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Mayor, City of Rosemead

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cc: CalRecycle (Howard Levenson, Mark de Bie, Cara Morgan, Hank Brady, Georgianne Turner, Chris Bria, and Marshalle Graham)  
League of California Cities  
League of California Cities, Los Angeles County Division  
California State Association of Counties  
Each Member of the Los Angeles County Board of Supervisors  
Sachi A. Hamai, Los Angeles County Chief Executive Officer  
Each City Mayor/Manager in the County of Los Angeles  
South Bay Cities Council of Governments  
San Gabriel Valley Council of Governments  
Gateway Cities Counsel of Governments  
Southern California Association of Governments (Frank Wen)  
Each City Recycling Coordinator in Los Angeles County  
Each Member of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force  
Each Member of the Task Force Alternative Technology Advisory Subcommittee  
Each Member of the Task Force Facility and Plan Review Subcommittee