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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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April 21, 2016

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

Dear Ms. Nichols:

**COMMENTS ON DRAFT GREENHOUSE GAS QUANTIFICATION METHODOLOGY
FOR THE CALIFORNIA DEPARTMENT OF RESOURCES RECYCLING AND
RECOVERY WASTE DIVERSION GRANT AND LOAN PROGRAM**

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 draft Greenhouse Gas Quantification Methodology for the California Department of Resources Recycling and Recovery Waste Diversion Grant and Loan Program.

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.

Below are comments relating to the Draft Method for Estimating Greenhouse Gas Emission Reductions from Diversion of Organic Waste from Landfills to Compost Facilities:

- The use of recycled materials in place of raw virgin materials significantly reduces GHG emissions. However, the Recycling Emission Reduction Factors do not take into account where products are sent and their use once they are created. A portion of recycled products are shipped overseas and those emissions are not

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accounted for. We recommend that an effort is made to properly account for recycled products shipped to foreign countries or other states that do not implement appropriate regulations at least equivalent to those in California.

- The Emission Reduction Factors for Anaerobic Digestion do not include pipeline injection as a pathway for the use of biomethane. Pipeline injection is a viable use of the biomethane produced which could then be used to either create CNG or electricity. We recommend that the emission reduction factor for anaerobic digestion projects consider pipeline injection.

We hope that these issues will be addressed in the final Greenhouse Gas Quantification Methodology for the California Department of Resources Recycling and Recovery Waste Diversion Grant and Loan Program.

Should you have any questions regarding these comments, 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

MD:kk

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