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MARGARET CLARK, VICE - CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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December 21, 2015

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

Dear Ms. Nichols:

COMMENTS ON THE DRAFT SHORT-LIVED CLIMATE POLLUTANT (SLCP) REDUCTION STRATEGY

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 Short-Lived Climate Pollutant Reduction Strategy (Draft Strategy). The Task Force acknowledges that the comment period ended on October 30, 2015, but would appreciate CARB's consideration of the following comments as a part of the Draft Strategy finalization process:

- CARB aims to achieve 75 percent reduction of organics going to landfills by 2020 and 90 percent reduction by 2025. This requirement of 75 percent reduction by 2020 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. At least one hundred new facilities would need to be built in California in order to process the diverted organic waste pursuant to AB 1826. Permitting and constructing a new organic waste processing facility in California can take five to ten years. Building enough facilities to accommodate all of the organics generated in the state of California at an estimated cost of \$2 to 3 billion 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).
- In acknowledging the need for additional organics processing infrastructure, the Draft 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 Draft 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.

- The Draft Strategy lacks adequate 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.

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 hope that these issues will be addressed in the Final Proposed Short-Lived Climate Pollutant Reduction Strategy.

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

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

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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