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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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September 22, 2021

Ms. Liane M. Randolph, Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Ms. Randolph:

COMMENTS ON SHORT-LIVED CLIMATE POLLUTANTS IN THE 2022 CLIMATE CHANGE SCOPING PLAN

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the Short-Lived Climate Pollutant (SLCP) presentations on September 8, 2021.

To immediately reduce SLCP emissions and bend the global warming curve, climate experts explicitly call for accelerating the timeline for meeting the requirements of Senate Bill 1383 (2016), which calls for a 40 percent reduction in methane and a 50 percent reduction in anthropogenic black carbon by 2030. The Task Force urges California Air Resources Board (CARB) to prioritize and promote planning scenarios that would launch immediate management of urban, agricultural, and forest organic waste, and critically needed management/processing infrastructure, to reduce methane and other SLCP emissions. The scoping plan must clearly set forth interim SLCP reduction targets and align electrification policies with State mandates to reduce methane including reducing landfill disposal of organic waste by 75 percent by 2025.

Organic waste management projects have the added benefit of generating carbon negative biogas and electricity that can be used to replace fossil-based energy sources including diesel, which is by far the largest source of air pollution in the San Joaquin Valley and the South Coast Air Quality Management Districts. Eliminating methane generated from organic waste and eliminating the use of diesel can drastically benefit public health and safety from wildfires, airborne pollutants, and many other natural and man-made disasters.

The Scoping Plan should recommend strategies that advance policies, programs, and projects to replace diesel and fossil fuels used for vehicles and electric generation with carbon negative biogas generated from organic waste. This includes support for low NOx near zero emission vehicles which would help immediately get heavy duty diesel vehicles off the road to reduce air pollution and improve public health while heavy duty zero emission vehicle technologies continue to improve. Assistance for low NOx near zero emission vehicles would also support the organic waste diversion goals of Senate Bill 1383 which requires jurisdictions to procure and use products like Biogas produced from the processing of organic waste. In addition, the 2022 Scoping Plan can develop pathways to support burgeoning alternative technologies that produce low carbon fuels and energy from organic materials and reduce greenhouse gases.

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To avoid catastrophic climate change, the Task Force urges CARB to make SLCP reductions the first and highest focus of the 2022 Climate Change Scoping Plan. In the scenarios planning and all other parts of the Scoping Plan, CARB must prioritize increasing use of biomethane to reduce SLCP emissions and eliminating diesel to reduce black carbon.

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.

In summary, the Task Force, strongly encourages CARB to consider the recommendations above when updating the 2022 Climate Change Scoping Plan. If you have any questions, 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
Council Member, City of Rosemead

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cc: Each Member of the California Air Resource Board
Richard Corey, Executive Officer, California Air Resources Board
Rachel Wagner, Director, California Department of Resources Recycling and Recovery
California State Association of Counties
League of California Cities – Los Angeles County Division
Each Member of the Los Angeles County Board of Supervisors
Fesia A. Davenport, Los Angeles County Chief Executive Officer
Gateway Cities Council of Governments
San Gabriel Valley Council of Governments
South Bay 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 the County of Los Angeles
Each Member of the Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force