



GAIL FARBER, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

California Energy Commission

**DOCKETED**  
**13-IEP-1M**

TN 71311

JUN 18 2013

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

June 17, 2013

IN REPLY PLEASE  
REFER TO FILE: **EP-4**

Mr. Garry O'Neill  
California Energy Commission  
Dockets Office, MS – 4  
1516 Ninth Street  
Sacramento, CA 95814-5512

Dear Mr. O'Neill:

### **STATUS OF BIOENERGY DEVELOPMENT IN CALIFORNIA DOCKET NO. 13-IEP-1M**

On behalf of the County of Los Angeles Department of Public Works (Public Works), I want to thank you for the opportunity to provide comments regarding the status of Bioenergy Development in California.

Public Works is responsible for advising the Los Angeles County Board of Supervisors on all solid waste issues for the County of Los Angeles, which encompasses over 10 million residents and businesses living in 88 cities and 134 unincorporated areas. With landfill closures approaching, the Board has instructed our Department to find alternative ways to manage municipal solid waste while protecting public health, safety and the environment.

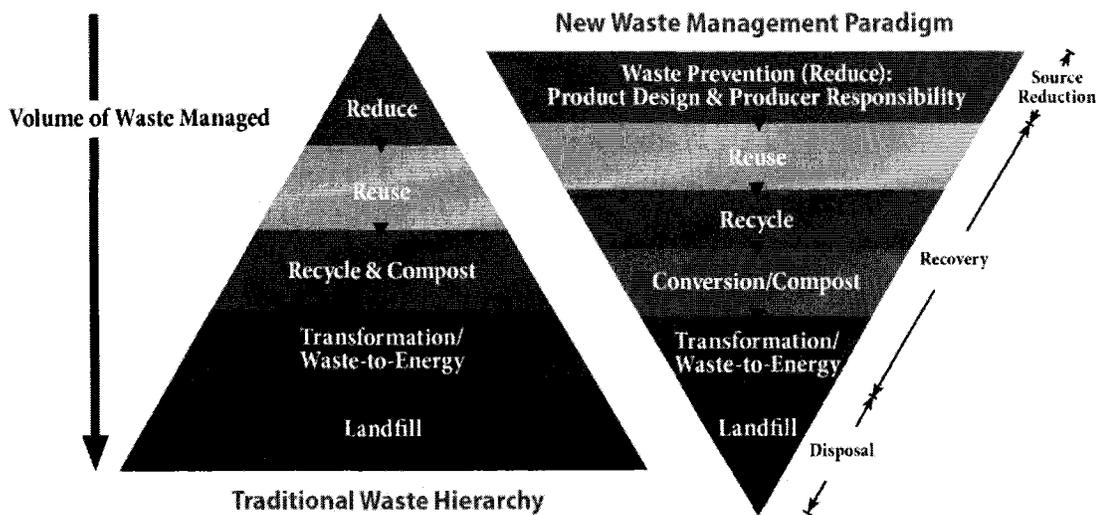
As a result of the June 3, 2013, workshop hosted by the California Energy Commission (CEC), as well as our many recent interactions with CEC, we are confident that you are thoroughly aware of the regulatory and economic challenges that have thus far prevented the State of California from making meaningful progress towards developing a robust bioenergy industry. We remain optimistic that the detailed action plan included in the 2012 Bioenergy Action Plan will provide a framework to achieve the State's goals of green job creation, waste reduction, and sustainable production of energy and renewable transportation fuels.

We strongly recommend the following solutions to the barriers identified in the 2012 Bioenergy Action Plan;

### 1. Revise the State Waste Management Hierarchy

The State is already a national leader in source reduction and recycling. Continually enhancing these waste reduction programs, while developing additional sustainable alternatives for diverting residual waste from landfills will put us on a path towards a waste-free future.

As you develop the 2013 Progress-to-Plan, we recommend that you include a section on the importance of revising the State's current waste management hierarchy to place a greater emphasis on source reduction and resource recovery, which should include recovering fuels and other forms of energy from waste. For reference, below is a New Waste Management Paradigm developed by the Los Angeles County Integrated Waste Management Task Force in conjunction with Public Works. This paradigm is similar to waste management hierarchies at the Federal and International level.



## **2. Identify Eligible Feedstock for Municipal Solid Waste Conversion**

Action 1.4 of the 2012 Bioenergy Action Plan states that prior to December 31, 2013, CalRecycle will develop front-end processing standards to ensure that recyclable materials are removed prior to Municipal Solid Waste Conversion. CalRecycle has hosted workshops, including one at our Department Headquarters, to solicit stakeholder feedback on draft concepts to develop such standards. So far, the proposals we have seen from the State focus on a specific, numerical-based standard.

Regional influences, including differences in waste characteristics in urban and rural communities and even variability on a neighborhood-basis are factors that influence a Material Recovery Facility's (MRF) ability to extract specific quantities of potentially recyclable materials from the wastestream.

As you develop the 2013 Progress-to-Plan, we recommend that alternatives be discussed and included for further consideration. Rather than prescribing specific numerical standards, we recommend that CalRecycle to develop a guidance document containing a series of best management practices and procedures that may be implemented at a MRF, depending on the type of MRF (i.e. single-stream, dual stream, mixed waste, construction and demolition debris). This guidance document should be developed by CalRecycle through a public process with input from stakeholders.

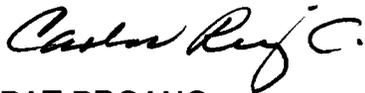
Local permitting agencies could then use this guidance document to develop specific permit requirements tailored to their local climate change and recycling goals, geographical limitations, waste characteristics, and available markets for products or byproducts produced.

Mr. Garry O'Neill  
June 17, 2013  
Page 4

On behalf of the County of Los Angeles, I thank you for the opportunity to provide input on the 2013 Progress – to – Plan for the Bioenergy Action Plan. We agree with the CEC that California has enormous potential to create energy from organic waste materials. The Bioenergy Action Plan is an important roadmap for identifying current barriers to the development of bioenergy and recommending actions to address these barriers so that the State of California can meet its clean energy, waste reduction and climate protection goals. We look forward to working with you towards achieving these mutual goals.

Very truly yours,

GAIL FARBER  
Director of Public Works



*for* PAT PROANO  
Assistant Deputy Director  
Environmental Programs Division

TM:gg  
P:\Sec\Status of Bioenergy Development in California Docket NO. 13-IEP-1M