LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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GAIL FARBER CHAIR
MARGARET CLARK VICE CHAIR

July 12, 2010

Ms. Laurie Burt, Commissioner
Massachusetts Department of Environmental Protection
1 Winter Street
Boston, MA 02108

Dear Commissioner Burt:

CONCERN REGARDING *BIOMASS SUSTAINABILITY AND CARBON POLICY STUDY* RELEASED JUNE 10, 2010

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express our concern with the report entitled *Biomass Sustainability and Carbon Policy Study* (Study), which was developed for the Massachusetts Department of Environmental Protection (MDEP) by Manomet Center for Conservation Sciences (MCCS) and released on June 10, 2010. The Study is narrow in scope, focusing only on biomass harvested from actively managed natural forests. There are numerous other sources of waste biomass, that when converted into renewable energy results in a net reduction of greenhouse gas (GHG) emissions. We are concerned that the findings of the Study are being generalized, misinterpreted, and widely disseminated in the public domain.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989, 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.

Coal generates 54 percent of the electricity and is the single biggest air polluter in the United States. Coal pollutes when it is mined, transported to the power plant, stored, and burned. The Union of Concerned Scientists estimates biomass energy reduces

carbon dioxide emissions by 90 percent compared with fossil fuels. Biomass may be used as an alternative to fossil fuels in producing electricity as well as biofuels. Cleaner transportation fuels have the potential to play an important role in addressing climate change since the transportation sector accounts for approximately one third of the United States' total carbon dioxide emissions.

Biomass resources vary throughout the Country. In Los Angeles County, for instance, we generate over 10 million tons of post-recycled residual solid waste each year. Approximately half of this is biogenic, organic material. This represents a plentiful resource that can be utilized to significantly diversify transportation fuels and energy resources and reduce dependence on landfills. Burning biomass is not the only way to release energy from biomass. Together with the County of Los Angeles, the Task Force has evaluated hundreds of companies that utilize non-combustion conversion technologies to convert post-recycled residual solid waste into electricity and biofuels. Utilizing these technologies could result in GHG reductions through (1) reduction of transportation emissions resulting from long distance shipping of waste; (2) elimination of methane production from waste that would otherwise be landfilled; and (3) displacement of the use of fossil fuels by net energy (fuel and electricity) produced by conversion technologies.

We are concerned that the findings of this Study and the way it is presented could negatively impact biomass policy development that is currently taking place on both the state and federal levels, and glaring headlines such as "Biomass Worse than Coal" perpetuate the status quo of energy generation from non-renewable sources. We appreciate the clarifying statement issued by MCCS on June 21, 2010, which reinforces the fact that the study was based on a very narrow evaluation with very particular assumptions and factors; however, unless the Study is removed from the public domain and a clarification is issued by your agency, the misuse and misinterpretation of this Study by the media and decision makers will likely continue as evidenced by ongoing efforts in Massachusetts to eliminate biomass from eligibility under your State's renewable energy program.

We strongly encourage MDEP to broaden the scope of future studies related to biomass management and energy production to include GHG emissions analysis of other forms of biomass as well as other technologies.

Thank you for considering our comments on this important issue. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Sincerely,

Margaret Clark

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: Ian Bowles, Massachusetts Executive Office of Energy & Environmental Affairs
Philip Giudice, Massachusetts Department of Energy Resources
Lisa Jackson, U.S. Environmental Protection Agency
Jared Blumenfeld, U.S. Environmental Protection Agency, Region 9
Each Member of the Integrated Waste Management Task Force
Each Member of the Alternative Technology Advisory Subcommittee