

DOCKETED	
Docket Number:	20-LITHIUM-01
Project Title:	Lithium Valley Commission
TN #:	246834
Document Title:	Los Angeles County Integrated Waste Management Task Force Comments - Docket No 20-LITHIUM-01 - Draft Report of the Blue Ribbon Commission on Lithium Extraction in California
Description:	N/A
Filer:	System
Organization:	Los Angeles County Integrated Waste Management Task Force
Submitter Role:	Public Agency
Submission Date:	10/26/2022 11:56:21 AM
Docketed Date:	10/26/2022

Comment Received From: Los Angeles County Integrated Waste Management Task Force

Submitted On: 10/26/2022

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Additional submitted attachment is included below.



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October 26, 2022

California Energy Commission
Docket Unit, MS-4
Docket No. 20-LITHIUM-01
715 P Street
Sacramento, California 95814-5512

COMMENTS ON DRAFT REPORT OF THE BLUE RIBBON COMMISSION ON LITHIUM EXTRACTION IN CALIFORNIA

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to submit comments on the Draft Report of the Blue Ribbon Commission on Lithium Extraction in California prepared by the Lithium Valley Commission (Commission).

Assembly Bill (AB) 1657 (Garcia, 2020) was drafted and signed with the vision to increase possibilities for the Salton Sea region, with both the potential for the area becoming a competitive source of lithium supply that could satisfy more than one-third of the worldwide demand and investing in local and regional economic and community investment opportunities. AB 1657 took effect on January 1, 2021, requiring the California Energy Commission (CEC) to convene and establish the Commission. The Commission's main task was to develop the Report documenting findings and recommendations regarding lithium extraction.

The Report presented findings and 44 recommendations for consideration to the Legislature, state and local agencies, and lithium recovery project developers. As part of these recommendations, the Commission explored the potential waste streams from the direct lithium extraction facilities and identified policy options that address barriers to recycling and opportunities for minimizing environmental and economic cost while maximizing material recovery.

In addition to the recommendations provided in the Report, the Task Force strongly recommends a complete and thorough "Life Cycle" analysis using lithium as a source of geothermal energy in comparison with other energy sources such as wind, solar, and fossil fuel. The analysis should include metrics that track all resources needed to build and upgrade geothermal energy and transmission facilities to provide electricity to the

grid. These resources include water demand, greenhouse gas emissions, use of chemicals, waste produced, air pollution, and other demands on resources.

The Task Force supports efforts to invest in renewable energy so long as the investments include programs that require project developers to recover lithium from lithium-based products sold in California, especially electric vehicle (EV) batteries. According to the Report, global EV sales are projected to include more than four million passenger vehicles sold globally in 2021 and zero-emission vehicle sales rising more than 150 percent from 2019 to July 2021. As the sales of EV's continue to surge worldwide, demand for lithium and other metals needed to build lithium-ion batteries is surging. To keep pace with skyrocketing growth in EV production and sales, market analysts anticipate that lithium demand will increase from current levels of less than 100,000 metric tons Lithium Carbonate Equivalent per year to over three million tons per year in 2030.

The life expectancy of EV batteries is 10 to 20 years. New technology is needed to recycle the lithium and other elements in EV batteries that have reached the end of their useful lifespan. When EV batteries and other lithium products reach the end of life, they are still rich in lithium and other elements and can provide a crucial resource for recovery. Recycling can provide these raw elements at a lower cost and reduces the need to mine raw ore, including direct lithium extraction, that comes with environmental costs. Unfortunately, many batteries are discarded improperly and end up in landfills. The Task Force supports recommendations in the Report that advocate for the development and adoption of a robust circular economy (cradle-to-cradle) approach when considering environmentally responsible sourcing of raw materials and requirements for product design that supports end of life recovery, reuse, and recycling of materials.

The Task Force supports the Report's recommendation that the State must be ready to evaluate recovery options and fund the appropriate industrial-scale lithium recycling facilities in conjunction with a thorough life cycle analysis and consistent with the Report from the Lithium-Ion Battery Recycling Advisory Group (Advisory Group) which advises that the Legislature should consider requiring a digital identifier on all lithium-ion batteries sold in California, including chemistry and supply chain information. The Task Force also recommends that the Commission and CEC incorporate other policy recommendations submitted by the Advisory Group to the California Environmental Protection Agency in March 2022. AB 2832 (Dahle, 2018) required the Advisory Group to convene and submit policy recommendations to the Legislature to ensure "...that as close to 100 percent as possible of lithium-ion batteries in the state are reused or recycled at end-of-life."

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 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 the CEC to consider the recommendations above during this comment period. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or (909) 592-1147.

Sincerely,



Sam Shammass, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force

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cc: Each Member of the California Energy Commission
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