

April 28, 2022

The Honorable Cristina Garcia
California State Assembly
1021 O Street, Room 8140
Sacramento, CA 95814

RE: Oppose Unless Amended—AB 1857 (C. Garcia)—Solid Waste

Dear Assemblymember Garcia,

On behalf of the City of Long Beach (City), I regrettably must oppose AB 1857 unless it is amended. While the City shares the legislation's intent to strive for zero waste and has been an active partner in helping to achieve the State's emissions reductions goals, the legislation would serve to increase landfilling and its associated emissions impacts in environmental justice communities across California. Unless the bill is amended to provide substantial State resources that will subsidize infrastructure development and support for advancing zero waste to landfills, it will simply exacerbate the environmental impacts of waste management given the lack of available alternatives to landfilling.

The City is committed to sustainable waste management practices and has outlined several key objectives in the [Climate Action and Adaptation Plan](#) to reduce emissions related to waste. Transformation of waste into electricity through the City's waste-to-energy facility, the Southeast Resource Recovery Facility (SERRF), is a critical part of the City's multi-faceted approach to sustainable waste management. Furthermore, in an effort to reach zero waste, the City provides community programs and educational services to encourage reduction, reuse, and recycling. The City is also working diligently to develop an organic waste program in compliance with State requirements. All these methods have been shown to substantially decrease greenhouse gas emissions by diverting waste from landfills.

Waste-to-energy is a leading technology to reduce the environmental impacts of landfilling, even when compared to landfills equipped with landfill gas capture technology. Countless scientific studies conducted by State and federal environmental regulatory agencies, such as the California Air Resources Board, CalRecycle, and the United States Environmental Protection Agency, have demonstrated that waste-to-energy offers significant greenhouse gas reductions compared to landfilling waste. Methane is 80 times more potent than carbon dioxide over 20 years as a greenhouse gas, and NASA scientists have identified landfills as super-emitters of methane. By contrast, every ton of waste processed at a waste-to-energy facility avoids a ton of carbon dioxide-equivalent emissions. At SERRF, 99.5% of particulate matter is removed from gas exhaust using Best Available Control Technology, and the facility is removed from the immediate surrounding community, with the nearest resident being 1.7 miles away.

Recognizing the clear environmental benefits of waste-to-energy, current State law allows jurisdictions to receive diversion credits for up to ten percent of their municipal solid waste when they utilize waste transformation sites like SERRF. These credits not only help the nearly 150 jurisdictions that use SERRF to fulfill the State requirement to divert at least 50 percent of municipal waste from landfills, but they also advance renewable energy production by transforming waste into electricity and significantly increasing metals recycling. SERRF reduces the volume of solid waste processed at the facility by around 90 percent,



while recovering enough electrical energy to power 30,000 homes and recycling an average of 750 tons of metals monthly that otherwise would have been sent to landfills. The facility helps to ensure the City responsibly disposes of waste generated in our region without having to transport it to environmental justice communities throughout California, and SERRF supports the local economy by providing well-paid jobs to 60 employees, 44 of which are represented by unions.

AB 1857 seeks to remove the diversion credit that jurisdictions receive for utilizing waste-to-energy facilities like SERRF. Eliminating this credit will most certainly jeopardize jurisdictions' ability to meet State diversion objectives, subjecting them to significant financial and regulatory penalties. Even more importantly, the legislation will undermine the State's environmental goals to reduce greenhouse gas emissions by forcing jurisdictions to transport municipal solid waste to landfills across California and in neighboring states. Transporting just the City's waste to a landfill, instead of using SERRF, could increase annual truck trips by more than 750,000 miles, resulting in significant air quality impacts. Moreover, while all City refuse trucks are powered by compressed natural gas or liquified natural gas, the distance to landfills would require more diesel trucks on the roads including in environmental justice communities.

The City is currently engaged in efforts to achieve zero waste to landfills through technologies like waste-to-energy at SERRF; proactive community education to increase waste reduction, reuse, and recycling; and the development of citywide organics collection and procurement programs. The City is also assessing additional opportunities for waste transformation to improve operations, environmental controls, and organic waste processing at the SERRF site. These facility improvements will result in more long-term advancements in waste reduction and recycling through SERRF while diminishing the need for landfilling.

In direct contrast to these sustainable waste management actions, AB 1857 does little to substantively advance zero waste in practice. The legislation requires the creation of an investment plan to encourage zero waste; yet in the years it takes to develop this plan and to implement the infrastructure and technology investments needed to realize the goals of zero waste, AB 1857 will instead have the effect of increasing landfilling in the near-term. By disincentivizing waste-to-energy, AB 1857 would undermine one of the few currently available pathways to reduce disposal at landfills, and the alternative of landfilling would increase harmful emissions in communities across California.

For these reasons, the City opposes AB 1857 unless it is amended to provide a meaningful funding mechanism that would subsidize alternatives to landfilling.

Sincerely,



THOMAS B. MODICA
City Manager

cc: The Honorable Speaker Anthony Rendon, State Assembly
The Honorable Lena Gonzalez, State Senate, 33rd District
The Honorable Tom Umberg, State Senate, 34th District
The Honorable Steven Bradford, State Senate, 35th District
The Honorable Mike Gipson, State Assembly, 64th District
The Honorable Patrick O'Donnell, State Assembly, 70th District

