



GATEWAY CITIES

COUNCIL OF GOVERNMENTS

November 8, 2018

Artesia

Avalon

Bell

Bellflower

Bell Gardens

Cerritos

Commerce

Compton

Cudahy

Downey

Hawaiian Gardens

Huntington Park

Industry

La Mirada

Lakewood

Long Beach

Lynwood

Maywood

Montebello

Norwalk

Paramount

Pico Rivera

Santa Fe Springs

Signal Hill

South Gate

Vernon

Whittier

County of Los Angeles

Port of Long Beach

California Environmental Protection Agency
California Air Resources Board
Byron Sher Auditorium
1001 I Street
Sacramento, California 95814

Dear California Air Resources Board Members:

Comments to CT2018 – California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation

In response to the California Air Resources Board's notice of public hearing to consider proposed amendments to the California cap on greenhouse gas emissions and market-based compliance mechanism regulation, the Gateway Cities Council of Governments (Gateway Cities COG), respectfully submits comments on this rulemaking, as it applies to the two existing waste-to-energy facilities in California, one of which is located within the Gateway region, specifically in the Port of Long Beach and co-owned by the City of Long Beach and the Los Angeles County Sanitation District (LACSD).

The Gateway Cities COG represents 27 cities in southeast Los Angeles County, as well as a portion of Los Angeles County and the Port of Long Beach. Our mission is to improve the quality of life for the two million residents of Southeast Los Angeles County by targeting initiatives that include transportation planning, affordable housing, improving air quality, economic development and other community-enhancing activities. The waste-to-energy facility in the Gateway region located in the Port of Long Beach serves 25 of our member cities, who all utilize this site as a waste disposal option.

Regulations proposed by the California Air Resources Board (CARB) to impose Cap and Trade Program (Program) compliance costs would increase costs to operate our local waste-to-energy facility as a necessary means to keeping the facility operational. This would unfortunately add to the financial burden of our communities, many of which are already economically challenged.

Further, if regulations adopted by the California Air Resources Board create an economic environment that results in the closure of our local waste-to-energy facility, the Gateway region would lose an existing asset that:

1. Helps cities meet State Integrated Waste Management (AB 939) diversion mandates;
2. Supports greenhouse gas emission reductions in waste management, as compared to landfills; and
3. Enables local, state and federal law enforcement agencies to safely dispose of confiscated narcotics.

Given these reasons, the Gateway COG respectfully opposes the current language and requests revisions that would enable waste-to-energy to continue to be a part of southeast Los Angeles County's waste disposal system; without it, our cities would have no other option but to take waste that is currently disposed of at the waste-to-energy facility, to a landfill instead.

Sincerely,



Nancy Pfeffer
Executive Director

cc: The Honorable Speaker Anthony Rendon, State Assembly
The Honorable Steven Bradford, State Senate, 35th District
The Honorable Ricardo Lara, State Senate, 33rd District
The Honorable Janet Nguyen, State Senate, 34th District
The Honorable Mike Gipson, State Assembly, 64th District
The Honorable Patrick O'Donnell, State Assembly, 70th District