CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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August 31, 2015

California Air Resources Board
Attn: Mr. Michael Tollstrup
PO Box 2815
Sacramento, CA 95812

Dear Mr. Tollstrup:

The California Association of Sanitation Agencies (CASA) is pleased to submit comments on the Climate Change Pillar on Natural and Working Lands. CASA appreciates the opportunity to work with the State toward proactive solutions for this critical pillar to advance soil health and mitigate climate change.

CASA is a statewide organization representing cities, counties, and special districts that provide essential public services through wastewater collection, treatment, biosolids management and recycling, renewable energy production, and water recycling services to millions of Californians. CASA's membership includes small, medium, and large agencies representing more than 90% of California's sewered population. CASA members are actively engaged as partners with the state to fulfill by 2020 a number of mandates and initiatives intended to deliver renewable energy and mitigate climate change impacts. These include: (1) providing 33% of the state's energy needs from renewable sources; (2) reducing carbon dioxide equivalent emissions to 1990 levels; (3) reducing the carbon intensity of transportation fuel used in the state by 10%; and (4) recycling 75% of the solid waste generated in the state. Additionally, CASA is committed to assisting the state in implementing the Healthy Soils Initiative and in minimizing the release of Short Lived Climate Pollutants (SLCP).

Publicly owned treatment works (POTWs) must responsibly manage biosolids which are produced as part of the wastewater treatment process. CASA strongly recommends that the benefits of biosolids be explicitly included in the further development of plans to implement this pillar. Roughly 60% of the biosolids managed in California each year are land applied in agricultural or horticultural settings which improve soil health, sequester carbon, and increase crop production. Biosolids help to mitigate climate change by reducing or eliminating the use of fossil fuel intense inorganic fertilizer and by increasing long-term sequestration of carbon in soil. Roughly 0.22 gallons of fossil fuel is required to produce every pound of inorganic nitrogen fertilizer, illustrating the tremendous offset gained by using biosolids as a substitute. Because biosolids are an organic matrix, rich in organic carbon and nitrogen as well as other valuable micro and macro nutrients, biosolids improve soil tilth, reduce the need for irrigation because of their excessive water holding capacity, and increase crop production.

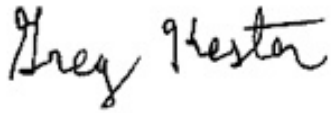
Furthermore, biosolids can be utilized to reclaim fire-ravaged land, control erosion, and reduce the potential severity, and climate change impacts, of future fires by allowing native vegetation

to outcompete invasive species which become dried out fuel by early summer. Such reclamation can aid in the reduction of the release of black carbon through wild fires. CASA has a California based research team already in place and research objectives scoped to help quantify the benefits of biosolids for fire reclamation and suppression.

CASA supports the Marin Carbon Project and the other invaluable efforts presented at the August 5th workshop. We would, however, recommend that other research teams, including Stanford based ReNUWit, be consulted to ensure the complete spectrum of options are taken into consideration while developing the implementation plan.

CASA stands ready to assist the State in the development of its implementation plan and to provide any information or data to support the use of biosolids that may be desired. Please feel free to contact me at gkester@casaweb.org or at 916-844-5262 with any questions or for further clarification.

Sincerely,



Greg Kester
Director of Renewable Resource Programs