



Comments of
Inland Empire Utilities Agency
on the DRAFT Aliso Canyon
Methane Leak Climate Impacts
Mitigation Program

Air Resources Board
1001 I Street
Sacramento, CA

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The Inland Empire Utilities Agency (IEUA/Agency) appreciates the opportunity to comment on the draft Mitigation Program to Address the Climate Impacts of the Aliso Canyon Natural Gas Leak (hereafter “draft plan”).

IEUA is a regional wastewater treatment agency and wholesale distributor of imported water, serving approximately 850,000 people over 242 square miles in western San Bernardino County. The Agency is focused on providing three key services: (1) treating wastewater, developing recycled water, local water resources, and conservation programs to reduce the region’s dependence on imported water supplies; (2) converting biosolids and waste products into a high-quality compost made from recycled materials; and (3) generating clean energy from renewable sources.

IEUA fully supports the Air Resources Board’s draft plan and agrees that projects that reduce methane from landfills and wastewater in southern California should be a primary focus of any mitigation efforts. These same projects can “jump start” on-going methane reduction in support of CARB’s Short-Lived Climate Pollutant Program goals which IEUA also supports.

The Short-Lived Climate Pollutant Reduction Strategy describes in detail how the wastewater industry can play a vital role in managing organic waste that is diverted from landfills. Co-digestion of biosolids and diverted food waste at wastewater facilities represents a highly cost-effective mitigation strategy that can easily achieve the required methane destruction needed to offset the climate impacts from the leaked methane at Aliso Canyon.

Food waste diversion projects are among the most cost-effective investments the State can make to reduce methane emissions, according to a recent study by Ramboll Environ. The study identifies organics diversion as a particularly smart investment of Greenhouse Gas Reduction Fund dollars, particularly in light of their demonstrated ability to substantially reduce short-lived climate pollutants (methane) and the potential to produce carbon-negative transportation fuel.

In addition, wastewater treatment facilities in southern California are well-positioned to proceed quickly in accepting processed food waste for co-digestion in existing wastewater anaerobic digesters where excess capacity is available. On a statewide basis, the California Association of Sanitation Agencies has estimated that wastewater agencies may have digester capacity available to accept up to 75% of the food waste currently being disposed at landfills in California. Because these wastewater digesters are already sited, built and operational, and there is a streamlined permit pathway for taking processed organic waste to these facilities, the wastewater sector presents an invaluable opportunity for early and rapid action to divert substantial quantities of organic waste from landfills and reduce methane emissions within the next few years.

The Air Resources Board should consider incentivizing regional projects that encourage public/private partnerships and collaboration among the public wastewater agencies with local waste haulers and cities as an efficient and cost-effective option to divert organic material, specifically food waste, from landfills to existing digestion facilities and to productively use the methane gas for energy and transportation fuel.

IEUA is already in the process of considering how to best utilize its existing digestion facilities to capture more of the Inland Empire's food waste. Our agency currently accepts 140 wet tons of diverted food waste each day. We are working on a proposal with our community to expand our operations to accept 320 wet tons per day and to recover the methane for clean energy and fuel production.

In summary, we believe that mitigation of the Aliso Canyon methane leak through investments in regional programs in Southern California for food waste diversion to existing wastewater digester facilities will provide significant benefits and achieve multiple State goals including but not limited to the following:

- Significant **GHG-reduction**, particularly methane.
- Progress toward the ambitious State goal of **75 percent diversion** of all organic material from landfills by 2020.
- Significant potential to **reduce criteria pollutants (NOx and PM)** through the production and use of carbon negative transportation fuel for heavy-duty freight transportation on southern California freeways.
- Significant **benefits to disadvantaged communities**.
- Help in achieving the State's **50 percent reduction in petroleum use** goal by replacing diesel with carbon-negative renewable natural gas.
- Furthering the State's **sustainable freight** strategy.
- Substantial **clean energy** production, including decarbonization the state's natural gas system.

In addition to the broad benefits outlined above, regional food waste diversion at publicly-owned wastewater treatment facilities projects can easily meet and exceed each of the mitigation program objectives and criteria outlined in the draft plan.

IEUA looks forward to working with the Air Resources Board, SoCal Gas Company and other stakeholders to quickly identify the best projects for the methane mitigation.