CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted electronically to lcfs-wkshp-oct20-ws

Re: California Association of Sanitation Agencies Comments on the Low Carbon Fuel Standard Potential Regulation Revisions as presented during the October 14th – 15th Workshop

Dear Sirs:

The California Association of Sanitation Agencies (CASA) appreciates this opportunity to provide comments on the potential revisions to the Low-Carbon Fuel Standard (LCFS) as presented during the October 14th – 15th, 2020 workshop hosted by the California Air Resources Board (CARB).
CASA is an association of local California wastewater agencies engaged in advancing the recycling of wastewater into usable water, as well as the generation and beneficial reuse of renewable energy, biosolids, renewable fuel, and other valuable resources. Through these efforts we help create a clean and sustainable environment for Californians. Our members are focused on helping the State achieve its climate change mitigation mandates and goals, which include:

- Reducing short-lived climate pollutant (SLCP) emissions
- Effectively diverting organic waste from landfills
- Providing an increasing percent of the State's energy needs from renewable sources
- Reducing carbon intensity of transportation fuel used in the State
- Increasing soil carbon and carbon sequestration under the Healthy Soils Initiative and Forest Carbon Plan

As we have noted in previous discussions, the wastewater sector represents an important in-state partner for development of low-carbon fuels as well as for meeting SB 1383 waste diversion goals. As documented in the recently released report (August 2020) assessing co-digestion capacity, the California State Water Resources Control Board (SWRCB) estimated total existing excess wastewater digester capacity may be able to divert up to 7,000,000 wet tons per year of food waste from landfills in California for co-digestion. Using the Tier 1 model for organic wastes provided by CARB, this is equivalent to 89,000 tons per year of avoided methane.

The wastewater sector is aligned with goals of the LCFS program, notably to increase cost-effective use of renewable energy and to reduce greenhouse gas (GHG) emissions. Wastewater plants across California have the ability to increase co-digestion as SB 1383 is implemented but can only do so if it is cost-effective. The LCFS should provide a viable incentive for co-digestion of diverted organic waste and the conversion of our excess

energy to transportation fuel. However, we remain concerned that the simplified calculators adopted in 2018 do not provide the wastewater sector the credit for avoided methane emissions achieved by co-digesting diverted food waste.

CASA has had productive discussions with CARB in which it seems understood that multiple benefits are realized through co-digestion and that credit should be awarded for the GHG emission reductions achieved. This requires immediate further action by either developing new simplified calculators or integrating existing ones for sewage sludge digestion and food waste digestion as a Tier 1 option. As discussed during the workshop, CARB should address pathway certification for digesters with multiple feedstocks, referred to as co-digestion. Prioritizing a food waste pathway within a co-digestion system at wastewater treatment plants would encourage SB 1383 organic waste diversion as well as accelerate development of low-carbon fuel production from these systems. Certification of a fuel pathway for each individual co-digestion feedstock would be onerous and we suggest that the food waste contribution to biogas production be prioritized and prorated. We strongly recommend a simplified approach assuming a baseline biogas production from sewage sludge digestion of 15 scf/lb of VS destroyed and assume all additional biogas is the result of the additional organic feedstock, eliminating the unnecessary burden of excessive testing.

In order for the receipt of food waste for co-digestion to be viable, it must be cleaned of contaminates so as not to have adverse impacts on equipment, the microbial community in the anaerobic system, nor on the biosolids which are a product of digestion. LCFS credits, in particular those with a negative CI value, could be a strong economic incentive to invest in the needed equipment and the ability to accept more food waste. To achieve the state's organic diversion and GHG emission reduction goals, it is critical that the appropriate pathways are established in an expeditious manner to provide this incentive. We strongly urge Board staff to work with CASA and our members to establish these pathways that can serve as a model for others.

CASA believes that both renewable natural gas and electric fueled vehicles should be incentivized under the LCFS. We therefore recommend that, as proposed for dairy manure digestion, CARB should extend the electricity endpoint option to the Tier 1 Simplified CI calculator for organic waste and wastewater sludge digestion. Consistent with the Governor's Executive Order to require zero-emission vehicles by 2035, this enhancement to the CI toolkit would aid in development of low-carbon electricity projects.

We appreciate this opportunity to comment and your willingness to consider our recommendations. We greatly appreciate how responsive staff has been to CASA and we look forward to continued collaboration to develop pragmatic solutions to these issues. Please let me know if we can set a time to meet for discussion of our recommendations. I can be contacted at gkester@casaweb.org or at 916-844-5262.

Sincerely,

Greg Kester

Greg Kester
Director of Renewable Resource Programs

cc: Adam Link, Executive Director, CASA
Sarah Deslauriers, Climate Change Manager, CASA
Charlotte Ely, State Water Resources Control Board
Mark de Bie, CalRecycle