



September 12, 2018

Mary Nichols, Chair
California Air Resources Board 1001 "I" Street
Sacramento, CA 95814

Submitted electronically:

[http://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=alisompdraft-
ws&comm_period=1](http://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=alisompdraft-
ws&comm_period=1)

Re: California Association of Sanitation Agencies Comments Regarding the
Proposed Aliso Canyon Mitigation Agreement

Dear Chair Nichols and Board Members:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to comment on the proposed Aliso Canyon Mitigation Agreement (Agreement). CASA is an association of local agencies, engaged in advancing the recycling of wastewater into usable water, biosolids, generation of renewable energy, and other valuable resources. Through these efforts we help create a clean and sustainable environment for Californians. One of CASA's priorities is to address climate change policies, initiatives, and opportunities through a unified voice advocating for wastewater community perspectives. Our members are focused on helping the State achieve its multiple mandates and goals, including:

- Reducing carbon dioxide equivalent emissions to 40% below 1990 levels
- Providing 50% of the State's energy needs from renewable sources
- Reducing carbon intensity of transportation fuel used in the State by 20%
- Diverting 75% of organic waste from landfills and recycling 75% of solid waste in the State
- Increasing soil carbon under the Healthy Soils Initiative and Forest Carbon Plan
- Reducing short-lived climate pollutant emissions (specifically, methane emissions 40% below 2013 levels)

CASA respectfully requests that the Agreement be reconsidered and reopened. The Agreement appears to only benefit residents outside the area impacted by the natural gas leak and it is not consistent with ARB's 2016 Mitigation Plan. Furthermore, funding appears to be awarded on a non-competitive basis to one purveyor of technology benefiting the dairy sector alone, while the Mitigation Plan also recommends the wastewater sector and landfills play a key role in the mitigation program. We also do not understand why funds are awarded as loans rather than grants? A competitive solicitation for grant funding may yield more effective mitigation results. As noted in our March 24, 2016 comment letter on the draft Mitigation Plan, in addition to providing the essential public service of cleaning water and treating biosolids, the wastewater sector can maximize resource recovery from a wide array of waste streams and potential end-products. Wastewater treatment plants can do this while reducing the release of methane with fairly minor ancillary upgrades by maximizing the use of existing infrastructure (i.e., anaerobic digesters, power generating

units, and biosolids treatment facilities), which will serve as near term mitigation solutions for the Aliso Canyon leak.

The acceptance of hauled-in organic waste such as fats, oils and grease (FOG), food waste (source separated), vegetative food waste (cannery, food processing, etc.), and others for anaerobic digestion at wastewater treatment plants is an important management option for this mitigation program. Co-digestion is a central component of the reduction strategy adopted by ARB and CalRecycle, as well as the regulations being developed under SB 1383 to implement short-lived climate pollutant reduction projects. CASA conservatively estimates that at least 75% of food waste currently landfilled could be accepted for co-digestion at wastewater treatment plants. Unfortunately, this type of project which could directly benefit those impacted by the Aliso Canyon leak and affected ratepayers in the Los Angeles basin, was evidently not even considered in the development of the Agreement.

Utilizing the additional biogas produced for on-site power generation, conversion to transportation fuel, or pipeline injection will further promote implementation of sustainable energy infrastructure which is the second bulleted area of concentration in the Mitigation Plan. Ancillary infrastructure for biogas clean-up, emission controls, and power generating units are necessary mitigation components which can directly benefit residents impacted by the leak.

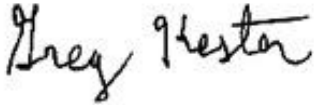
We strongly recommend the Agreement seek to maximize partnerships between the wastewater and solid waste sectors as a top priority in the mitigation program. Wastewater treatment plants are already permitted with basic infrastructure in place to co-digest diverted organics. Ancillary infrastructure is needed to pre-process food waste into a digestible form, receive the pre-processed food waste on-site, upgrade anaerobic digesters to improve mixing and heating, utilize the increased biogas, further condition the biogas as necessary, and ensure compliance with air emission limits, as well as support the beneficial use of the increased biosolids. Each of these should be eligible investments in the Agreement.

In summary, wastewater treatments plants provide multiple co-benefits while mitigating the Aliso Canyon methane emissions and helping the state achieve its multiple climate change goals for short-lived climate pollutant reduction, organic waste diversion, and renewable energy production. Wastewater treatment related projects can:

- Significantly reduce emissions of methane by maximizing the use of existing anaerobic digesters through the receipt and management of hauled-in organic waste for co-digestion, which simultaneously furthers the objectives of SB 1383.
- Sequester carbon in soil through the application of biosolids to agricultural land, thereby avoiding use of fossil fuel-intense inorganic fertilizer while improving soil health, crop yields, and water holding capacity.
- Increase the productive use of the captured methane through power generation, on-site heating needs, pipeline injection, or conversion to transportation fuel.

Again, CASA appreciates the opportunity to provide comments on the proposed Agreement and looks forward to working with ARB, Southern California Gas Company, and other partner agencies moving forward. Please contact us if you have any questions at (916) 844-5262 or via email at gkester@casaweb.org. We welcome the opportunity to further discuss opportunities for the wastewater community to help mitigate impacts from the Aliso Canyon natural gas leak.

Sincerely,



Greg Kester
Director of Renewable Resource Programs

cc: Scott Smithline, CalRecycle
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