



## THE CITY OF SAN DIEGO

May 26, 2016

California Air Resources Board  
Attn: Tracy Jensen, Clerk of the Board  
1001 I Street  
Sacramento, CA 95814

Submitted electronically: <http://www.arb.ca.gov/lispub/comm/bclist.php>

### **Re: City of San Diego Public Utilities Department Comments Regarding the Proposed Short Lived Climate Pollutant Reduction Strategy**

Dear Chair Nichols and Board Members:

Thank you for the opportunity to provide comments related to the Proposed Short-Lived Climate Pollutant (SLCP) Reduction Strategy. The City of San Diego Department of Public Utilities (City) commends the State Air Resources Board (ARB) for its efforts to reduce global warming and its harmful impacts by exploring ways to reduce SLCPs in California.

The City of San Diego Public Utilities Department provides water services to the entire city, as well as wastewater services to the city and surrounding communities, and actively participates in the beneficial use and reuse of both biosolids and biogas. The City works closely with the California Association of Sanitation Agencies (CASA) and the California Wastewater Climate Change Group (CWCCG) and supports efforts to address climate change proactively and effectively. As a publicly-owned (wastewater) treatment work (POTW), the City of San Diego's Public Utilities Department agrees with ARB that POTWs must be part of a workable solution to the threat of global climate change. These comments will focus on the methane provisions of the Strategy, since they are anticipated to have the greatest impact on City operations.

#### **Policy goal of reducing Short-Lived Climate Pollutants**

The City supports the state's effort to address climate change through targeted efforts to reduce SLCP emissions, and we have already incorporated many of the Strategy's initiatives into our local operations. We are particularly proud of our record of capture and beneficial reuse of methane at both our Point Loma Wastewater Treatment Plant and Metropolitan Biosolids Center facilities, where its applications include powering cogeneration and a fuel cell, while other biogas is cleaned and injected directly into utility pipelines. *The City is committed to continuing this stewardship through the expanded capture and beneficial reuse of methane emissions.*

#### **Inconsistencies between San Diego's Zero Waste Plan and the SLCP Strategy**

In line with our ongoing commitment to reduce our climate footprint and exercise stewardship of valuable resources, the City of San Diego adopted a Zero Waste Plan last year. This Plan formalizes the City's ongoing effort to divert waste from our landfills and sets specific and aggressive compliance goals to guide implementation of the Plan. Addressing the landfilling of organic wastes in particular is an important element of our Zero Waste Plan, but the Plan's target dates and percentage reduction goals apply to solid waste in general, as opposed to the organic waste stream in particular. This approach provides the City with greater flexibility to





meet these targets and also address any systemic issues that may arise during implementation of the Plan.

The Strategy's effort to regulate a specific portion of the waste stream—organic material—could conflict with the City's adopted diversion deadlines that apply to solid wastes more broadly. The Zero Waste Plan imposes a goal of 100% solid waste diversion by 2040, whereas the Strategy contains the express goal of "effectively eliminating organic disposal in landfills by 2025." Reducing the landfilling of organic wastes is critical to full implementation of the City's Zero Waste Plan, but attaching a specific deadline to the redirection of that particular portion of the waste stream could conflict with the City's existing planning efforts that are geared toward compliance with our broader waste diversion goals. *The City requests that the Strategy incorporate flexibility for localities that have adopted their own waste reduction and diversion plans, to avoid duplicative efforts that may yield little actual reduction in SLCP emissions.*

#### **Need for state support and resources to implement the Strategy**

The City of San Diego acknowledges that significant changes to our waste collection and treatment systems will be necessary in order to meet our shared policy goals of reducing landfilling and expanding the use of treatment approaches that increase capture and beneficial reuse of methane/biogas. Indeed, San Diego's own Zero Waste Plan states that "...the facilities identified in the NDFE (City's Nondisposal Facility Element) will not be adequate to achieve 75% diversion. Infrastructure to address specific waste streams, like food waste, will need to be built to meet the required diversion goals." [Emphasis added]

Effectively implementing these policy goals will require significant state support, including funding for both infrastructure expansion and planning. In addition, the viability of these initiatives depends upon agencies' ability to utilize the end products generated, including cogeneration power, biogas and biosolids. To this end, it is critical that markets for biosolids products be established, and that barriers to the beneficial reuse of methane (interconnection issues, pipeline injection issues, increased greenhouse gas reporting obligations, etc.) be addressed in advance, in order to ensure the success of the Strategy. *The City urges the State to provide funding and address regulatory barriers as quickly as possible in order to facilitate implementation of the Strategy.*

#### **Co-digestion as an option, not a requirement**

The City is currently exploring the implementation of co-digestion as a powerful tool to increase the capture and beneficial reuse of methane at existing facilities. Although co-digestion is a promising approach, it also requires in-depth assessments of the size and treatment capacity of our existing facilities, structural and geographic limitations, upgrade costs and timelines, and the impact of any potential changes on the City's ratepayers. These assessments are costly and will take time, and the outcomes will likely vary greatly between agencies. As a result, we assume that different agencies will likely come to very different conclusions as to their ability to adopt co-digestion at their facilities, and should not be required to do so if other approaches to meeting waste diversion policy goals are more suited to their particular circumstances. *The City is opposed to the imposition of a co-digestion mandate on wastewater agencies, and urges an alternative approach that incorporates agencies' own assessments as to the feasibility of co-digestion at their facilities.*

#### **Institutional implementation complexity**

The Strategy includes wastewater agencies as a part of the solution to the state's goal of diverting organic waste streams from landfills. While the City agrees with this policy goal—



and has adopted the same in our Zero Waste Plan—it is important to recognize that in many localities wastewater and landfill facilities are operated by different agencies. In San Diego, while the Public Utilities Department (PUD) runs the wastewater treatment facilities, the City's Environmental Services Department (ESD) runs the landfill. Although there is institutional synergy between these departments, it will likely take time to coordinate planning and study efforts between the departments relative to implementation of the SLCP Strategy. *The City requests that the state's implementation of the SLCP Strategy provide sufficient time for appropriate planning and coordination among the municipal entities with jurisdiction over the various facilities impacted by the Strategy.*

#### **Incomplete economic estimates**

The City appreciates the Board's effort to include detailed economic assessments of the potential impact of the SLCP Strategy's implementation on local agencies. However, it appears that some important estimates and considerations are missing from these assessments. First, although there is certainty that the construction, operation and maintenance costs associated with implementation will be significant and long-term, the viability and duration of offsetting revenues, credits and other associated benefits is relatively uncertain. Specifically, the availability of LCFS and RIN credits, as well as the existence of biosolids market options will play a major role in the City's development of an implementation approach that best meets the needs of our existing system, circumstances and ratepayers. Second, the Strategy is silent as to some potentially significant costs for impacted agencies, including those attributable to implementation of waste stream pre-processing operations necessary to facilitate co-digestion, as well as the expense of managing the biosolids stream produced by our facilities in the absence of any viable, revenue-generating markets for the end product. *The City asks that the final Strategy incorporate greater analysis of both the costs and uncertainties facing public agencies under existing statutory and regulatory requirements.*

#### **Conclusion**

The City of San Diego has a long history of success in meeting the water and wastewater needs of its rapidly growing and diverse population while taking proactive steps to reduce greenhouse gas emissions and the climate change impacts of our system. We are thankful for the opportunity to comment on the Proposed Short-Lived Climate Pollutant Reduction Strategy and look forward to continuing to work with the Board to reduce global change impacts in California.

If you have any questions, please feel free to contact me or Ms. Carolyn Ginno at (858) 654-4286.

Sincerely,



Cathleen C. Pieroni  
External Water Policy Program Manager

CG/mle

cc: Alejandra Gavaldón, Director of Federal Government Affairs and Water Policy,  
Office of Mayor Kevin Faulconer