



CALIFORNIA ASSOCIATION of SANITATION AGENCIES

925 L Street, Suite 200 • Sacramento, CA 95814 • TEL: (916) 446-0388 • www.CASAweb.org

April 7, 2023

Mr. Paul Arneja
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: CASA Comments on the Proposed Advanced Clean Fleets Regulations 15-Day Language

Submitted online via: https://www.arb.ca.gov/lispub/comm/iframe_bcsbform.php?listname=acf2022

Dear Mr. Arneja:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to provide comments on the Proposed Advanced Clean Fleets (ACF) Regulations 15-Day changes released March 23, 2023. CASA is an association of local agencies performing essential public services – cleaning wastewater to protect public health and the environment while advancing community resilience through the recovery of renewable resources (water, biogas, biosolids, nutrients, etc.). Through these efforts we help create a clean and sustainable environment for Californians.

Our members are focused on helping the state achieve carbon neutrality, including its current 2030 mandates and goals for greenhouse gas [GHG] emissions reductions, which include:

- Reducing short-lived climate pollutant (SLCP) emissions by accepting and co-digesting diverted organic (food) waste from landfills pursuant to SB 1383
- Reducing carbon intensity of transportation fuel by using the biogas we generate
- Providing 100 percent of the state's energy needs from renewable sources
- Increasing soil carbon and carbon sequestration by land applying biosolids and supporting the Healthy Soils Initiative, Climate Smart Strategy, and Wildfire and Forest Resilience Action Plan

As written, the proposed 15-Day ACF language limits the use of wastewater-derived renewable non-fossil biomethane and will negatively impact successful implementation of SB 1383 intended to divert organics away from landfills to mitigate climate change. Our members have begun to invest in SB 1383 implementation and continue to invest in the low carbon fuel standard program and EPA's renewable fuel standard, to achieve statewide methane reductions. Our members have also begun converting their passenger and light-duty vehicles, as well as medium- to heavy-duty vehicles where ZEVs that perform the necessary functions are available. However, the regulatory language does NOT provide the Board-directed flexibility to fleets for use of wastewater-derived renewable biomethane that **will be** produced post-2024 when the construction of SB 1383 facilities begins. Rather, the language limits the vehicles fueled by biomethane to those in the fleet as of January 1st, 2024. This is before SB 1383 facilities have been built! Without expanded use of renewable biomethane as a transportation fuel as SB 1383 facilities begin construction and operation, the wastewater sector will NOT have sufficient markets for the additional biomethane and, in turn, will NOT be able to accept the diverted food waste if their only option is to flare that additional biomethane. Other markets such as pipeline injection or on-site power and heat production are challenging in many parts of the state and insufficient for all biomethane produced. This is a dilemma since the wastewater sector has the capacity to accept ALL food waste which must be diverted from landfills by 2025. As a result, the language incentivizes keeping diesel vehicles longer than planned and methane emissions from landfills will continue because there are not enough emissions reduction credits in the state's air basins to permit the needed compost facilities.



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We do not believe CARB staff intended for the proposed ACF to halt SB 1383 projects that seek to accept diverted organic waste from landfills and investments in beneficially using the wastewater-derived renewable biomethane. We have appreciated the additional meetings and engagement with CARB staff to provide input on the developing ACF regulations; however, the changes to date do not reflect our feedback nor are they responsive to Chair Randolph's request made during the public hearing October 27th, 2022.

We remain committed to working collaboratively with you on these critical efforts. We will continue to prioritize resilient essential public service operations to protect public health and the environment. Please contact me with any questions at sdeslauriers@carollo.com or at 925-705-6404.

Sincerely,

A handwritten signature in black ink, reading 'Sarah A. Deslauriers'.

Sarah A. Deslauriers, PE, ENV SP
Climate Change Program Manager

cc: Liane Randolph – Chair, CARB Board
Gideon Kracov – CARB Board Member
David Garcia – CARB Office of the Chair, Director of Legislative Affairs
Dr. Steven Cliff – CARB Executive Officer
Rajinder Sahota – CARB Deputy Executive Officer, Climate Change & Research
Matt Botill – CARB Division Chief, Industrial Strategies
Sydney Vergis – CARB Division Chief, Mobile Source Control
Tony Brasil – CARB Division Chief, Transportation and Clean Technology
Shereen D'Souza – CalEPA Deputy Secretary
Zoe Heller – CalRecycle
Charlotte Ely – SWRCB
Chris Hyun – SWRCB
Adam Link – Executive Director, CASA
Jessica Gauger – Director of Legislative Advocacy and Public Affairs, CASA
Adam Link – Executive Director, CASA
Greg Kester – Director of Renewable Resource Programs, CASA