



CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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

August 27, 2024

Matt Botill, Division Chief
Industrial Strategies Division

Cheryl Laskowski, Branch Chief
Transportation Fuels Branch

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted electronically via: <https://ww2.arb.ca.gov/lispub/comm/bclist.php>

Re: CASA Comments on the Low Carbon Fuel Standard Proposed 15-Day Regulatory Revisions

Dear Mr. Botill and Ms. Laskowski:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to provide comments on the proposed 15-day revisions to the Low Carbon Fuel Standard (LCFS) released August 12, 2024. CASA is an association of local California wastewater agencies, known as Water Resource Recovery Facilities (WRRFs), engaged in advancing the recycling of wastewater into usable water, as well as the generation and beneficial use of renewable energy, biosolids, 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 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 clean and 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

CASA continues to urge CARB to carve out the wastewater sector to preserve the use of and credit for our non-fossil renewable wastewater-derived biomethane in the LCFS program indefinitely. The wastewater sector will continue to produce and capture biogas, as well as strive to beneficially use (not waste) it for as long as we are performing the essential public service of wastewater and solids treatment with anaerobic digesters. However, reducing the credit periods from three to two for the avoided methane credit will disincentivize co-digestion projects at WRRFs within California and unintentionally drive co-digestion projects out-of-state. We made similar arguments during the Scoping Plan Update and the Advanced Clean Fleet (ACF) regulations. In fact, the CARB Board included language in the last paragraph of the adopted [Resolution 23-13](#) accompanying the adoption of the ACF Regulations directing staff to work with sister regulatory agencies and CASA to ensure multiple long-term uses of wastewater-derived biomethane. We urge that the collaborative part of that process begin as soon as possible.

Since its inception, the wastewater sector has been aligned with the LCFS program goals, notably to diversify transportation fuels away from fossil fuel-based sources to both improve air quality and

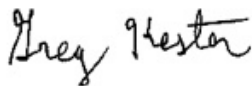
achieve carbon neutrality. The biogas generated at WRRFs not only provides a reliable low carbon fuel, but its use safeguards our communities by fueling vehicles that service infrastructure critical to protecting public health and the environment in all geographical dispositions and in response to major events, including planned power outages. Additionally, there is a need for immediate reductions from federal mobile (including aircraft) sources to meet State Implementation Plan (SIP) requirements in non-attainment zones for ozone (e.g., South Coast-LA Basin) as well as address the estimated 10% deficit in jet fuel. Utilizing WRRF biomethane as a low carbon fuel can meet the federal aviation needs and needed ozone reductions.

Additionally, we support CARB's proposed change to section 95488.3(d) (including Table 6) to account for land use changes related to crops grown for low carbon fuel production to more accurately represent its carbon intensity. To be consistent, CASA strongly recommends accounting for carbon sequestration achieved in soils where biosolids (a byproduct of co-digestion) are land applied in the estimate of carbon intensity. This aligns with CARB's intention to account for life cycle emissions of each pathway, and supports each sustainability criterion required under subsection 95488.9(g).

We strongly urge CARB to preserve the use of our biogas as a viable low carbon fuel in perpetuity or as long as feasible since it will always be produced and successful implementation of SB 1383 mandates hinges on its beneficial use.

We appreciate this opportunity to comment and your willingness to consider our recommendations. 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 and Sarah Deslauriers can be reached at sdeslauriers@casaweb.org or at 925-705-6404.

Sincerely,



Greg Kester
Director of Renewable Resource Programs

cc: Adam Link, Executive Director, CASA
Sarah Deslauriers, Director of Air, Climate, & Energy Programs, CASA
Rajinder Sahota, CARB
Anil Prabhu, CARB
Charlotte Ely, SWRCB
Chris Hyun, SWRCB
Zoe Heller, Director CalRecycle
Mark de Bie, CalRecycle
Cara Morgan, CalRecycle