

SCAP

SOUTHERN CALIFORNIA ALLIANCE OF
PUBLICLY OWNED TREATMENT WORKS



July 9, 2021

Mr. Richard Corey
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, California 95814

Comments on the Public Workshop Series to Commence Development of the 2022 Scoping Plan Update

Dear Mr. Corey:

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) appreciates the opportunity to comment on the Public Workshop Series to Commence Development of the 2022 Scoping Plan Update.

SCAP represents over 80 public water/wastewater agencies in Southern California. SCAP members provide essential water supply and wastewater treatment for approximately 20 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino, and Ventura counties. SCAP's wastewater members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastewater into resources for beneficial uses such as recycled water and renewable energy.

SCAP works closely with the California Association of Sanitation Agencies (CASA) in our commitment to protecting public health and the environment and promoting renewal resource opportunities for wastewater agencies. As outlined in the CASA comment letter, we are concerned about the Scoping Plan Update's potential exclusion of near-zero renewable natural gas vehicles. While we support efforts to electrify the mobile sector, it is imperative that California implement actions that will immediately reduce emissions to achieve our climate goals, cut diesel emissions and facilitate attainment of federal ozone standards by 2023.

Some of our members have recently invested significant capital in co-digestion and biogas conditioning infrastructure to produce RNG, onsite fueling stations, as well as compressed natural gas (CNG) sewer pipeline maintenance vehicles – all in support of state mandates for achieving GHG emission reductions by 2030.

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Unfortunately, these recently acquired low emission CNG vehicles do not meet the ZEV or NZEV definitions as required in the proposed regulation, yet they have been the target of state and local air district regulations and incentive programs. If the proposed regulation continues with the definitions as is, our well-intentioned members will have invested ratepayer funds for infrastructure and low emission vehicles that do not meet the proposed requirements. There are extreme challenges with ZEV technology for some of the specialized sewer pipeline and sewer pump station maintenance vehicles that are essential tools used by our sector to protect public health and the environment.

Our members are extremely concerned that CARB appears to be excluding RNG derived from wastewater treatment anaerobic digestion as a viable solution to our climate and ozone attainment in California. We would like to highlight that the use of RNG with ultra-low emission engines will not only reduce NOx emissions more rapidly than solely relying on electrification, but it will lower the GHG emissions to a greater extent while preserving our ability to perform critical sewer pipeline and pump station maintenance.

We would like to voice our strong support of the comments submitted by CASA on July 9, 2021. Thank you for considering our comments. If there are any questions or concerns regarding this transmittal, please contact me directly at (760) 415-4332 or sjepsen@scap1.org

Sincerely,

Steve Jepsen

Executive Director - SCAP