



August 25, 2020

Climate Action Reserve

Via electronic submittal

Subject: Soil Enrichment Protocol

To Whom It May Concern:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to provide comment on the Climate Action Reserve's (CAR) second draft Soil Enrichment Protocols which outline a program to quantify and earn credit for changes in agricultural practices which sequester carbon in soil and decrease greenhouse gas (GHG) emissions. CASA is an association of local agencies engaged in advancing the recycling of wastewater into usable water, as well as the generation and beneficial use of renewable energy, biosolids, and other valuable resources. Through these efforts, we help create a clean and sustainable environment.

CASA appreciates CAR's responsiveness to our first round of comments and for reaching out to discuss the issues raised. We specifically support the addition of biosolids in the protocol in recognition of its value as an organic fertilizer/soil amendment that results in the reduction of GHG emissions and sequestration of carbon in the soil below. Biosolids are produced as an inherent part of the wastewater treatment process and can be land applied in agricultural settings helping to mitigate climate change by substituting for the use of fossil fuel intense inorganic fertilizer and by improving long-term sequestration of carbon in soil. Roughly 0.22 gallons of fossil fuel is required to produce every pound of inorganic nitrogen fertilizer, illustrating the tremendous offset gained by using biosolids for land application. Because biosolids are an organic matrix, rich in organic carbon and nitrogen as well as other valuable micro and macro nutrients, biosolids improve soil tilth, reduce the need for irrigation by increasing the soil's water holding capacity, and increase crop production. We generally support the revisions in this new version of the protocol and provide specific comments below.

Specific comments:

1. We support the addition of biosolids to Table 6.1 as an organic soil amendment.
2. We support the addition of biosolids to the definition of organic nitrogen fertilizer.
3. We support the replacement of a 30 year crediting period with 10 year crediting periods which may be extended for two additional 10 year periods.
4. We recommend streamlining the verification process as it appears to be overly difficult and would require the expertise of third parties to complete. This may be a disincentive for enrollment in the program.

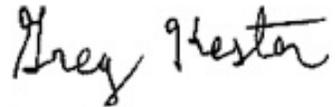
August 25, 2020

Climate Action Reserve - Soil Enrichment Protocol

Page 2

Please feel free to contact me directly at gkester@casaweb.org or at 916-844-5262 for further information or with any questions. Thank you very much!

Sincerely,

A handwritten signature in black ink that reads "Greg Kester". The signature is written in a cursive style with a large, prominent "G" and "K".

Greg Kester

Director of Renewable Resource Programs