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September 25, 2023

The Honourable Liane Randolph

Chair, California Air Resources Board

1001 I St.

Sacramento, CA 95814

**Re: Support for the Low Carbon Fuel Standard**

Dear Chair Randolph and Members of the California Air Resources Board,

I am writing as a concerned member of the American Biogas Council (ABC) to express my deep concerns regarding the proposed changes to the LCFS program. As a member of the ABC and an active developer in the swine-to-renewable natural gas (RNG) industry, I believe it is crucial to consider the following key points in your deliberations:

**The GREET Model's Scientific Validity**: The Greenhouse gases, Regulated Emissions, and Energy use in Transportation (GREET) model is widely recognized for its scientific rigor and robustness in carbon accounting. It is essential to acknowledge that the GREET model is backed by science and is considered the most widely accepted carbon accounting methodology. It is used by the US Department of Energy, the US Environmental Protection Agency, and other government agencies to estimate the life-cycle greenhouse gas emissions of transportation fuels. Any changes to the LCFS program should respect and align with the principles and standards set forth by the GREET model to ensure accurate and credible emissions reduction calculations.

**The Importance of Avoided Methane Crediting:** Senate Bill 1383 sets targets for reducing methane emissions from dairy and livestock farms in California by 40% by 2030 and 80% by 2050. The collaborative efforts of dairy and livestock RNG producers, governmental incentives, and LCFS offtake agreements have not only made these projects financially viable but also paved the way for further expansion. Presently, 161 dairy RNG projects are operational in California, with many additional projects in development. This impressive progress accounts for approximately 25% of the state's methane reduction targets and serves as a beacon of success in the field of renewable energy and methane mitigation.

This is a very encouraging development, and it is clear that the dairy and livestock RNG sector is playing a vital role in California's efforts to reduce methane emissions and achieve its climate goals.

The economic efficiency of dairy and livestock RNG projects is striking, with a cost-effectiveness of only $9 per ton of CO2e reduced, making these initiatives a model of sustainability within the state's climate programs.

We firmly believe that proposals seeking to exclude dairy and livestock RNG projects from the LCFS or restrict avoided methane crediting are flawed. Such actions would not only jeopardize the viability of existing dairy and livestock RNG projects but also stifle the financing and construction of forthcoming projects essential for meeting California's ambitious climate targets.

**Support for Biomethane Book & Claim:** Biomethane Book & Claim is consistent with renewable electricity standards and provides essential support for maintaining a robust RNG supply. Recognizing its consistency with renewable energy standards and keeping it within the LCFS program can further incentivize and support the

growth of renewable natural gas projects, and help to reduce the cost of RNG for consumers. Increasing the supply of RNG, biomethane book and claim can help to drive down prices.

I respectfully urge CARB to consider the implications of any proposed changes and continue to support environmentally sound and sustainable practices. MESKA Solutions, the ABC and its members are committed to reducing greenhouse gas emissions through innovative RNG projects, and we believe that collaboration with CARB can lead to effective and equitable solutions.

Thank you for your attention to these critical issues. I look forward to ongoing dialogue and collaboration with CARB to ensure that the LCFS program remains a powerful tool in the fight against climate change.

Sincerely,

Shannon Baucom

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Sources:

*The reference for the statement that the dairy and livestock RNG sector in California accounts for approximately 25% of the state's methane reduction targets is the 2023 California Climate Investments report. The report can be found here:*

*https://ww2.arb.ca.gov/sites/default/files/auction-proceeds/cci\_annual\_report\_2023.pdf*

*The report states that the dairy and livestock RNG sector has contributed significantly to methane emission reductions, with a substantial reduction of approximately 1 million metric tons of CO2e/year achieved through these projects. This represents approximately 25% of the state's methane reduction targets.*

*The report also notes that the dairy and livestock RNG sector is expected to continue to grow in the coming years, with the potential to reduce methane emissions even further.*