

**Comment 1 for LCFS-Fuel Pathways Comments (lcfsfuelpathway-ws) - 1st Workshop.**

First Name: John

Last Name: Duff

Email Address: john@sorghumgrowers.com

Affiliation: National Sorghum Producers

Subject: Calgren and California Ethanol & Power (CE&P)

Comment:

See attached for National Sorghum Producers comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-lcfsfuelpathway-ws-Wj4HZFIwVGJROlAy.docx>

Original File Name:

december\_2015\_pathway\_comments\_calgren\_california\_ethanol\_&\_power.docx

Date and Time Comment Was Submitted: 2015-12-26 13:02:49

No Duplicates.

## Comment 2 for LCFS-Fuel Pathways Comments (lcfsfuelpathway-ws) - 1st Workshop.

First Name: Tom

Last Name: Frantz

Email Address: tom.frantz49@gmail.com

Affiliation:

Subject: California Bioenergy Proposal

Comment:

LCFS Method 2 Fuel Pathway Applications #222

There are at least two major faults with this carbon intensity proposal by CalBio.

One, the LCFS requires a much more complete and thorough well to wheels analysis. The applicant proposes to begin their analysis with manure already sitting in a lagoon and releasing methane. But, that event does not happen in isolation. That event does not have to happen at all. It must be considered with the whole series of events and choices relating to the standard operations at this cluster of factory dairies.

Second, this proposal requests carbon credits for the produced CNG which includes a large negative credit for the methane emissions avoided. Their calculation then results in a large negative carbon intensity for the CNG fuel. But, there is no opposite debit for the methane that is released by these dairies from their other manure handling practices together with the enteric emissions from the cows themselves. All so-called waste products from these cows, whether they be liquid, solid, or gaseous must be considered for their CO<sub>2</sub>e. All other emissions of green house gases at the dairy must also be added if there is to be a credit for emissions which are avoided.

Therefore, it is expected that this proposal will be sent back to Cal Bio for a more complete and accurate analysis reflecting the requirements of the LCFS and other general accounting principles under AB32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-12-26 14:23:11

No Duplicates.

**There are no comments posted to LCFS-Fuel Pathways Comments  
(lcfsfuelpathway-ws) that were presented during the Workshop at this time.**