



September 14, 2023

The Honorable Liane Randolph
Chair, California Air Resources Board
1001 I St.
Sacramento, CA 95814

Re: Comments from Sean Trambley, American Biogas Council, before the Joint CARB / EJAC Meeting, September 14, 2023

Good evening Chair Randolph, CARB Board, and EJAC Members. Thank you for the opportunity to comment today.

The American Biogas Council (ABC) is the voice of the US biogas industry dedicated to maximizing carbon reduction and economic growth using biogas systems. We represent more than 400 companies in all parts of the biogas supply chain that are maximizing all the positive environmental and economic impacts biogas systems offer when they are used to recycle organic material into renewable energy and soil products.

The LCFS is one of the most impactful climate programs in California's efforts to address climate change. It is decarbonizing the transportation sector and reducing methane emissions. It's helping California achieve aggressive climate, carbon neutrality, methane and clean air goals.

Now, as California continues to look forward, we must not abandon the air quality benefits in the interim as we pursue a 100% ZEV goal. These efforts can be pursued simultaneously while maximizing climate benefits.

We encourage CARB to continue incentivizing the beneficial use of captured methane, both from farming operations and from organics waste diversion. Efforts to eliminate avoided methane crediting, are contrary to long standing carbon accounting methodologies and contrary to the intent and requirements of SB 1383.

The American Biogas Council strongly opposes any proposal that ignores avoided methane emissions. Recognizing avoided emissions and their role as short-lived climate pollutants, and incentivizing their removal from the atmosphere has proven highly successful and we encourage CARB to continue a science-driven framework that utilizes proven science like Argonne National Laboratory's GREET model.

Further, numerous RNG projects are currently in development that rely on the robust, mature, and predictable market LCFS has created. Undermining these projects now will create uncertainty in capital deployment decisions by investors who have made decisions based on LCFS credit values.

The state of California is seeing the benefits of CARB's efforts, and the deliberate prioritization of short-lived climate pollutants like methane. Biogas and RNG systems, especially those partnering with dairies are a big reason why.

With continued support of biomethane and avoided emissions in the LCFS, California can accelerate their carbon reductions. We worked with peers in the industry and experts at ICF to develop research in support of more aggressive CI reduction targets, with a 42% target by 2030 possible with existing policies. Now is the time to accelerate these efforts to reach California's aggressive climate goals. But ignoring the valuable reduction opportunities in particular sectors like dairies and landfills restricts CARB's ability to move swiftly and aggressively on climate targets.

The LCFS continues to drive investments in low carbon fuels and sound environmental policy. The American Biogas Council and its hundreds of members are proud to help drive this progress and are committed to CARB's efforts to eliminate methane.

We encourage CARB to stay the course and continue to provide the incentives needed to ensure dairy and other methane reductions are achieved consistent with the recently adopted 2022 Scoping Plan Update.

1126 I Street SE, Washington DC 20003 | 202-640-6595

team@americanbiogascouncil.org | www.americanbiogascouncil.org

Thank you for your consideration and the opportunity to speak today.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Trambley', with a stylized flourish at the end.

Sean Trambley
American Biogas Council

About the American Biogas Council

The American Biogas Council is the voice of the US biogas industry dedicated to maximizing carbon reduction and economic growth using biogas systems. We represent 400 companies in all parts of the biogas supply chain who are leading the way to a better future by maximizing all the positive environmental and economic impacts biogas systems offer when they recycle organic material into renewable energy and soil products. Learn more online at www.AmericanBiogasCouncil.org, Twitter [@ambiogascouncil](https://twitter.com/ambiogascouncil), and [LinkedIn](https://www.linkedin.com/company/ambiogascouncil).