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April 19, 2018
Richard Corey
Executive Director

Subject: Amendments to California Low Carbon Fuel Standard

Dear California Air Resources Board,

Currently the LCFS allows for credits for Renewable Power to be applied for hydrogen and electric vehicles for generation in California. We understand the objectives of limiting this opportunity to zero emission transportation options. However, we would also like ARB to consider the opportunity for transmitting manure by wire. Many ethanol producers ship distiller's grains to feed lots and have the opportunity to potentially truck manure back to a digester at the ethanol plant which would avoid methane emissions and also provide a source of low-carbon biogas for the ethanol plant.

However, the logistics of hauling manure and dealing with the digestate the ethanol plant are a challenging obstacle. Manure could be converted to biogas at the feedlot or dairy; however, the biogas is also not readily transported to an ethanol plant unless it is very close by which is rarely the situation. The final option would be to convert the manure to biogas and then to electric power for use at the ethanol plant and transmit the power via the electric grid.

We recognize that the LCFS currently does not allow for this option however the alternative would be to haul the manure by truck which would create more greenhouse gas emissions and additional road traffic as well as diesel exhaust emissions. We are open to discussing the potential options for transmitting manure by wire.

Perhaps the ARB could require new digester and power projects for this approach to eliminate providing credits for activities that already exist. Thank you for considering this important options for reducing GHG emissions.

Sincerely,

Mark Moser