



September 28, 2023

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

American Biogas Council Support for the Low Carbon Fuel Standard

Good morning and thank you for the opportunity to speak today.

My name is Sean Trambley and I am here on behalf of the American Biogas Council, the voice of the US biogas industry representing more than 400 companies in all parts of the biogas supply chain.

We have submitted several letters and comments to the board and staff outlining our views in more detail, but there are a couple points I'd like to highlight in my time today.

First, we are encouraged by the direction of the staff presentation, particularly the retention of avoided methane crediting and an auto acceleration mechanism for increased carbon intensity reductions.

We would like to emphasize higher carbon emissions reductions are possible with more ambitious targets for carbon intensity.

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.

These findings were presented to CARB staff, with higher reduction scenarios also outlined.

This is the time to accelerate 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.

Let's be ambitious!

Second, phasing out avoided emission crediting is phasing out science.

Avoided emissions are part of science-based, life cycle assessments, and ignoring those goes against internationally recognized standards of carbon accounting.

If California is interested in removing specific fuel sources from the program, this should be accomplished, not by phasing out science, but phasing out specific pathways over time.

Lastly, suggested changes to deliverability requirements for renewable fuels effectively incentivizes fossil natural gas to continue being used in California's transportation sector, due to the fact that fossil natural gas can continue to be moved into the State without restriction.

Strict deliverability requirements further limit the access to robust fuel supply, and slows the program's progress toward carbon neutrality.

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.

Thank you again for your consideration and the opportunity to share our views.

Sincerely,

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

Sean Trambley
State Policy Manager