6/23/22

California Air Resources Board

1001 I Street

Sacramento, CA 95814

Dear CARB board,

I work in the biogas industry, where renewable natural gas is supplied to California through the LCFS program. I support the proposed scenario in the 2022 scoping plan for several reasons.

1. Anerobic digestion (AD) of food waste, farm manure, wastewater solids, and biomass processes these wastes in an organic and beneficial way, producing many useful products while protecting the environment. If these wastes were not processed with AD, the environmental impact to the land, water and atmosphere would be more detrimental than without AD. More anerobic digestion of wastes is a key solution to carbon neutrality by 2045 or earlier.
	1. Digestate from anerobic digesters is an organic fertilizer. Using digestate for fertilizer is an American product, reduces the need for imported fertilizer, and reduces reliance on fossil fuels used to produce inorganic fertilizer. Digestate used for fertilizer improves soil health, reducing water needs for crops, and sequesters carbon.
	2. Carbon capture and utilization works well with AD, the CO2 can be used in greenhouses and the beverage industry, and this also is from an organic source.
	3. Biogas is a domestic fuel and replaces fossil fuel. Energy security from organically derived fuel supports carbon neutrality goals as well as independence from fossil fuels, supporting CARB’s goal to phase out oil and gas extraction operations by 2045.
2. The scoping plan should not be used as a referendum on the dairy industry. The dairy industry will continue with or without CARB’s action. CARB has the power, however, to encourage best practices by continuing to incentivize anerobic digestion of dairy manure and producing all the useful products listed above while protecting the environment.
3. Neither should the scoping plan be used as a referendum on the elimination of combustion. When we have our heads in our tailpipes, we lose sight of the entire process of power production. Pushing emissions upstream, and out of sight for electrical generation without biofuels replacing fossil fuels does not support carbon neutrality. There is no foreseeable scenario where wind and solar power will meet all of California’s energy needs. Electricity generation needs hydrocarbons for baseload. Replacing fossil fuels with the expansion of the production of biofuels, such as biogas produced from AD, is part of the clean energy transition CARB has shepherded thus far and will continue to be a key factor in California achieving carbon neutrality by 2045 or earlier.

Sincerely,

James Kendrick

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