



Ag Methane Advisors

February 22, 2023

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

RE: Comments on February 22, 2023 Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard

Dear Chair Randolph:

Thank you for the opportunity to provide comments related to the February 23, 2023 *Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard*. We appreciate the work put into the proposed changes by CARB staff and being able to review the workshop materials in advance after they were published on the CARB website.

Ag Methane Advisors mission is to support dairies in California and around the country in reducing their greenhouse gas emissions and improving their environmental performance. We believe that agricultural producers can contribute to climate change mitigation and environmental sustainability in many ways. We also believe that farms need financial incentives to implement these solutions. Most, if not all, dairies require a business case to make the necessary investments. Financial viability is critical to adoption of technologies and implementation of best management practices. Our services enable farms to monetize and profit from incentives that reduce GHGs, reward better environmental performance, and produce renewable energy. For the last ~12 years the focus of our services have been on helping farms access the incentives available through CARB's Low Carbon Fuels Standard (LCFS) program, and Compliance Offset program.

Related to the proposed changes to the LCFS we have the following comments:

- 1) Generally we support increasing the stringency of the LCFS program though a programmatic CI target of at least 35%, a near term step down, and automatic acceleration.
- 2) We encourage CARB not to implement a biomethane phase out from the LCFS program and removal of avoided methane emissions until a clearly defined alternative program or programs for other end uses of biomethane have been implemented.
- 3) Please include a mechanism for the “true-up” of LCFS credit issuance to apply retroactively from “provisional” pathway approval back to the beginning of project reporting with a “temporary” pathway.

- 4) Please allow biomethane to electricity projects to utilize a “temporary” pathway credit issuance process while awaiting “provisional” pathway approval.
- 5) We think that any deliverability requirements for biomethane should be consistent with those of the EPA Renewable Fuel Standard.
- 6) Please provide clarity on what you mean when you refer to dairy biomethane pathway “certification” as it applies to establishing the dates when potential changes would take effect (i.e. when crediting periods end, potential deliverability requirements take effect, avoided methane crediting ends, etc.). In particular, do you mean when a project is certified to start using a “temporary” pathway, when the “provisional” pathway is approved, or when the pathway is “certified” after operating for 24 months then going through verification. These different points in the pathway approval process occur about 2.5-3 years apart, and the distinction has a significant impact on when potential changes to the LCFS regulation effectively apply to projects. We encourage CARB to define the timeframe for eligibility/crediting related to the first date a project receives credits through the LCFS so that projects can utilize the LCFS incentive for their complete 10 year crediting periods and ensure stability and predictability in the implementation of projects.
- 7) Related to the point above, if you decide to implement the proposed deliverability requirements (which we don’t support) please do so in a way that allows projects to maintain a full 10 years of LCFS crediting in order to maintain clear market signals. I.e. the deliverability requirements should only apply to new projects which come into the program after the date the rules take effect, or for existing projects when they apply for a new crediting period.
- 8) Please provide the proposed changes to the Dairy and Swine Tier 1 CI calculator at least 1 month before the comment deadline on those changes.

Thank you for your consideration of these comments.

Patrick Wood
Founder, Ag Methane Advisors, LLC