



345 Inverness Drive South  
Building C, Suite 310  
Englewood, CO 80112

T 303-858-8358  
F 303-858-8431  
gevo.com

July 12, 2023

VIA ELECTRONIC FILING

Dr. Cheryl Laskowski  
Branch Chief, Low Carbon Fuel Standard Team  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

RE: Comments on "Proposed New Tier 1 Simplified Calculators" - "Biomethane from Anaerobic Digestion of Dairy and Swine Manure"

Dear Dr. Laskowski:

Gevo, Inc.'s (Gevo) mission is to produce energy-dense liquid hydrocarbons for drop-in transportation fuels such as gasoline, jet fuel, and diesel. Gevo's production process uses a combination of decarbonization technologies and sustainably farmed feedstock to produce fuels with substantially reduced carbon intensity (CI) compared to fossil fuel equivalents. Along these same lines, Gevo has developed a renewable natural gas (RNG) project in Iowa to support the development of fuels with reduced CIs compared to fossil fuel equivalents.

Gevo appreciates this opportunity to comment on the California Air Resources Board's (CARB) "Proposed New Tier 1 Simplified Calculator" regarding "Biomethane from Anaerobic Digestion of Dairy and Swine Manure" (Calculator).

### **Retention Time and Drainage**

Gevo noted that CARB has proposed a change regarding the "Retention Time and Drainage" instructions for Tier 1 calculators. Currently, an applicant can select from the options that are applicable to their farms in the "Manure-to-Biogas (LOP Inputs)" tab without having to select a particular month where the system is completely emptied. Gevo notes that CARB has now proposed a standardized requirement that: "For each September, the "System Emptied in This Month" must be selected."

Gevo appreciates what we perceive to be CARB's approach to standardize the Calculator's inputs for swift processing. Nonetheless, we are concerned that by setting this specific "System Emptied" timeframe, this requirement can result in a forced increase in the CI

of a project, causing a penalty to farms that retain a certain level of volatiles in their storage system throughout the year.

Though the proposal appears to seek to standardize, and only apply to, Tier 1 applications, to the extent CARB proceeds with the proposed change, we respectfully request that CARB continue to assess site-specific optionality in Tier 2 applications. This will ensure unnecessary penalties aren't assessed for farm-specific circumstances in which the farm does not completely empty their storage systems in or around September.

Beyond this comment above, we agree with the RNG Coalition's comments regarding the same Calculator. Thank you for the opportunity to comment.

Respectfully,



Kent Hartwig  
Director of State Government Affairs



Gevo, Inc.



Karyn Jones  
Director of Sustainability



Gevo, Inc.