



July 12, 2023

Ms. Cheryl Laskowski, Chief
Transportation Fuels Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Ms. Laskowski:

LF Bioenergy is an emerging leader in the development, construction and operation of renewable natural gas (RNG) production facilities on U.S. dairy farms. With a management team that combines leadership experience from the dairy, energy and agriculture industries, LF partners with dairy farmers to ensure each project positively impacts reduction of CO₂, the farm's sustainability goals, operations and financial success. LF is a member of the RNG Coalition.

LF Bioenergy appreciates the opportunity to submit these comments to the California Air Resources Board (CARB) in response to the "Biomethane from Anaerobic Digestion of Dairy and Swine Manure" calculator (manure calculator) published on 6/20/2023. We appreciate and support CARB's continued efforts in decarbonization through the LCFS program including continued support for the decarbonization of the dairy industry. We also appreciate the multiple aesthetic and functional upgrades to the manure calculator.

However, LF Bioenergy is concerned with the new requirement that an annual September lagoon cleanout baseline be modeled whether or not an annual cleanout was performed in the past.¹ This replaces a verifiable user-defined input based on real-world data with an overly conservative assumption, thereby hurting those projects that have the greatest methane-reduction benefit to the environment. The previous set of instructions functioned well, and many zero-cleanout projects have been validated and verified in the past several years. We request additional clarification from CARB as to why this change was necessary, and respectfully ask CARB to reconsider this adjustment.

Further, as mentioned in our letter on 3/9/2023, LF Bioenergy requests that CARB consider updates to the underlying excretion rate assumptions within the "Reference" tab. We understand that these assumptions are based on the Compliance Offset Protocol for Livestock Projects which was last updated nearly a decade ago. We believe that CARB should either update those assumptions based on the latest data available or allow user flexibility to update additional emission factors, particularly if the project operator can provide supporting data through actual data monitoring and/or laboratory analysis, similar to flexibilities added in other parts of the calculator (e.g. L4.6).

¹ Introduction tab: "Annual lagoon cleanout in September each year is required for the baseline modeling (Fields L1.(1-6).14)."



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Finally, as mentioned in our letter on 3/9/2023, LF Bioenergy supports the proposed true-up crediting mechanism with respect to temporary pathways and annual reports. This will provide better accounting of actual GHG reductions and provide greatly needed certainty to RNG project investors and developers.

We appreciate all the work that CARB has put into the LCFS regulatory update process thus far. Should you have any questions, please contact me at blilienthal@lfbioenergy.com

Sincerely,

Brent Lilienthal
President and CEO
LF Bioenergy LLC