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California Air Resources Board
1001 I Street
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Re: Draft Simplified Tier 1 Calculator for Biomethane from Anaerobic Digestion of Dairy and Swine Manure

Anew Climate, LLC (Anew) is submitting these comments to the California Air Resources Board (CARB) in response to the proposed simplified Tier 1 Calculator for Biomethane from Anaerobic Digestion of Dairy and Swine Manure (Calculator) and associated supplemental documents. We appreciate CARB's efforts to develop a simplified calculator and streamlined registration process to improve fuel pathway certification timelines.

Credit True-Up

Anew fully supports the introduction of a true-up on LCFS crediting in line with the proposal detailed in comments submitted by the Coalition for Renewable Natural Gas in response to the draft Calculator.

Fugitive Emissions and Digester Leakage

Anew supports allowing fuel pathway applicants the option to submit site specific inputs to demonstrate fugitive emissions on the Biogas-to-RNG tab as outlined in comments submitted by the Coalition for Renewable Natural Gas in response to the draft Calculator.

In addition, Anew requests that CARB allow fuel pathway applicants to submit site specific inputs to demonstrate digester leakage emissions on the Avoided Emissions tab. This would allow projects to provide actual operating values that may differ from the default values of 2% for enclosed vessels and 5% for covered lagoons.

GREET Inputs for L1. (1-6).14 Retention Time and Drainage

It is Anew's understanding that in the proposed GREET calculator for each September, "System Emptied in This Month" must be selected by the fuel pathway applicant. This assumption requires that all projects model their operations to include a complete annual cleanout of volatile solids. A complete annual cleanout is currently only required as a baseline assumption for greenfield projects in Table A.10 of the Compliance Offset Protocol for Livestock Projects[1].

The implementation of this proposed default assumption could result in non-greenfield projects being certified with a carbon intensity that is not representative of normal operating conditions. It could also result in a project's baseline methane emission levels being set below what would have otherwise been emitted to the atmosphere. This proposed default assumption may be more applicable to the average dairy operation, but the same conclusion isn't as appropriate for the average swine operation. Swine

[1] https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2014/capandtrade14/ctlivestockprotocol.pdf

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industry leaders and project operators have expressed that lagoons are cleaned out far less frequently than yearly over a 10 to 15-year time frame.

Therefore, on the Manure-to-Biogas (LOP Inputs) tab, applicants should be able to enter the project-specific lagoon cleanout frequency for swine livestock populations in the Calculator. Applicants should be able to select from lagoon cleanout frequencies that are less frequent than annual and have default inputs "amortized" according to CARB's current guidance document[2]. Furthermore, as an alternative, Anew encourages CARB to consider allowing swine projects to submit their site specific lagoon clean out frequencies as part of a Tier 2 fuel pathway registration.

Anew is available for questions and looks forward working with CARB in its continued efforts to improve the LCFS program.

Thank you.

[2] https://ww2.arb.ca.gov/sites/default/files/2020-09/2020_dairy-swine-manure_crediting_faq.pdf