



November 5, 2020

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Low Carbon Fuel Standard – Potential Regulation Amendments

Dear Air Resources Board Staff,

Thank you for the opportunity to provide comments following the October 14-15, Low Carbon Fuel Standard (LCFS) Public Workshop. AgLand Renewables is a strong supporter of the LCFS program and supports efforts to reduce the carbon intensity of fuels.

AgLand Renewables is an owner and developer of bio-processing facilities converting chicken and other poultry litter into renewable natural gas and fertilizers. Our process combines anaerobic digestion and nutrient recovery technologies to convert poultry waste into beneficial and sustainable products. AgLand Renewables is currently partnering with multiple farms and poultry operations in the Central Valley to establish operations in California.

Land-applied fertilizers, manures, and amendments containing high levels of reactive nitrogen both directly and indirectly release nitrous oxide (N<sub>2</sub>O), a potent greenhouse gas with 300x the impact of CO<sub>2</sub>. AgLand Renewables seeks to use the anaerobic digestion RNG fuel production process to displace sources of reactive nitrogen like poultry litter and conventional nitrate fertilizers with controlled-release, organic fertilizers engineered to provide nutrients with little to no greenhouse gas impact. To enable this, we support two primary LCFS amendments: (1) allowing for the full displacement of N<sub>2</sub>O emissions (including both use and application) from avoided poultry litter and conventional fertilizer application with a controlled release fertilizer generated via the anaerobic digestion RNG fuel production process and (2) allowing for the displacement of N<sub>2</sub>O emissions, irrespective of the feedstock used in anaerobic digestion, to be included in the carbon intensity for the RNG. We encourage ARB to use this amendment process to take a broad look at additional emission reduction opportunities, including N<sub>2</sub>O, rather than a smaller, more focused amendment process.

Thank you for the opportunity to provide comments on the potential amendments to the LCFS regulation. We look forward to working with staff to develop a fuel pathway for poultry litter conversion and continuing the effort to reduce the carbon intensity of fuels.

Sincerely,

Thomas Spangler  
Executive Chairman  
Agland Renewables