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June 12, 2015

The Honorable Mary Nichols, Chair
The Honorable Richard Corey, Executive Officer
California Air Resources Board
Sacramento, CA 95814

RE: Comments on the Short-Lived Climate Pollutant Reduction Strategy
Concept Paper

Dear Chairwoman Nichols and Mr. Corey,

I am writing on behalf of the American Biogas Council to express our strong support for the *Short-Lived Climate Pollutant Reduction Strategy Concept Paper*. The Concept Paper provides an excellent summary of the science and the urgency of reducing SLCPs and a very good starting point for developing the strategy to reduce SLCPs. We look forward to working with the Air Board and other stakeholders to develop a strategy that will reduce SLCPs and other pollution while helping to meet the state's clean energy, waste diversion and other important goals.

The American Biogas Council (ABC) represents over 200 businesses in across the US, including over 3 dozen located in California and dozens others doing business there, who are all dedicated to the development of the biogas industry. Our member companies span the entire biogas industry supply chain: project developers, landowners, anaerobic digestion providers, waste water companies, waste managers, utilities, financial firms and others.

The ABC reiterates and strongly supports these three main points and associated sub-points submitted by the Bioenergy Association of California (BAC), one of our members:

A. Strong Support for the Concept Paper Overall

The ABC strongly supports the Concept Paper overall and applauds the Air Board for producing an excellent first draft. We are especially impressed with the very strong summary of the science, the clear message throughout the Concept Paper about the urgency of reducing SLCPs, cross-sector and integrated strategies to reduce SLCPs.

B. Immediate Research Needs

The Concept Paper points out in several places where additional research and demonstration is needed. ABC supports the BAC

recommendation that the Air Board and other agencies should begin immediately to address the following important research needs:

1. Need to Quantify Lifecycle Emissions and Reductions from Organic Waste, including Different End Uses.
2. Need a lifecycle analysis of the GHG/SLCP emissions and reductions from forest fuel treatments and their end uses.
3. Need to quantify emissions reductions from organic soil amendments such as biochar, biosolids, digestate and compost.

C. Recommended Strategies to Reduce SLCPs

The ABC also supports the BAC recommended strategies that the Air Board should add:

1. Align GGRF and other funding with SLCP reduction priorities.
2. Need to change utility processes and incentives.
3. Need a cross sector strategy to increase the use of renewable gas, such as a Renewable Gas Standard.

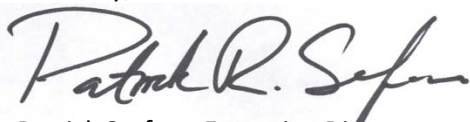
Like the BAC, we urge the Air Board to propose a policy that requires the increased production and use of renewable natural gas, like the Renewables Portfolio Standard (RPS) in the electricity sector and the Low Carbon Fuel Standard in the transportation sector. More than 25 percent of California's greenhouse gas emissions are from the use of fossil natural gas (not including leaks). Increasing the production and use of biogas processed into renewable natural gas would reduce SLCPs upstream, reduce fossil fuel emissions, and provide organic soil amendments such as biochar and biosolids. Increasing renewable gas production can reduce greenhouse gas emissions by tens of millions of metric tons per year.

Incentives are powerful tools for piloting and demonstrating new technologies and helping to commercialize an industry, but they do not provide the long-term market demand or certainty needed to truly transform an industry. Just as California needs the RPS and LCFS to move to renewable energy and low carbon fuels, it needs a policy to significantly expand the production and use of renewable gas.

The American Biogas Council urges the Air Board to recommend, in the SLCP Strategy, the adoption of a Renewable Gas Standard or other policy that requires California to increase the percentage of renewable gas, particularly biogas, produced and used in California. The path ARB proposes to take is at the forefront nationally on these issues. No other jurisdiction has put on the table anything nearly as comprehensive in the scope of the GHG issues they propose to address. Nor has an executive agency in any other state so boldly proposed integrated strategies that cross multiple agencies within the executive branch, as well as action from the legislature. This is bold leadership, and we support ARB's direction.

We look forward to working with the Air Board to develop and implement a successful strategy to reduce SLCPs. The Concept Paper is a great start.

Sincerely,



Patrick Serfass, Executive Director