



September 24, 2020

Re: Application B0109

Clean Energy Calumet – Maple Leaf/Grotegut RNG Facility, Newton, Wisconsin Compressed Natural Gas (CNG) from Dairy Manure Intermediate Facility: Maple Leaf Dairy East, Cleveland, Wisconsin Maple Leaf Dairy West, Cleveland, Wisconsin Grotegut Dairy Farm, Newton, Wisconsin

To Whom it May Concern:

In regard to this application, the Low Carbon Fuel Standard seems to require the following:

- A public process for determining the validity of a fuel pathway and the carbon intensity of that pathway.
- A fuel pathway that does not lead to worse environmental conditions in both the area or region where the fuel is produced and where it is consumed.
- A full life-cycle assessment of every aspect of producing the fuel and using the fuel.
- A determination of whether the fuel pathway meets the short- and long-term goals of California's Global Warming Act (AB32) and its amendments plus related laws.
- No double counting

Let's keep this simple. If the applicant(s) answers "yes" to any of the questions below then this Pathway application should not be approved. If the applicant refuses or cannot answer any of these questions the application should not be approved. Remember, CARB required the applicant to respond to all comments.

1. Has this dairy contributed in any way to unmitigated pollution of rivers, lakes, streams, groundwater or air?
2. Does this dairy produce CO₂ equivalent GHG emissions in total, both enteric emissions and from all related operations, that are more than twice the equivalent CO₂ emissions from the net methane which is captured by the digester(s) and ultimately used in California as a transportation fuel?
3. Does this dairy put or intend to put any organic products into the digester other than manure produced by cows at the dairy?

4. Does this dairy (or dairies) feed its cows distiller grains (wet or dry) which come from an ethanol plant supplying ethanol to California as a transportation fuel?
5. If approved to send LCFS fuel to California, will this dairy claim any related carbon credit publicly in Wisconsin for reducing its GHG emissions?
6. Does this dairy(s) receive federal price supports or other federal subsidies directly or indirectly?
7. Will the production and sale of methane at this dairy(s) under current LCFS credit pricing be more lucrative than the production of milk at current milk prices in Wisconsin?
8. Will the combustion in California of this methane produced in Wisconsin cause any pollution in California which would contribute to the violation of any Clean Air Act federal air quality standard and thus harm public health?
9. Is there any information in this public online application that has been redacted so that the public cannot calculate for themselves whether the final pathway derived carbon intensity is correct?
10. Has this dairy(s) already received Cap and Trade money from California for the purpose of building a dairy digester?

Assuming the answer to one or more of the questions above will be “yes” we ask that this application be rejected.

Sincerely,

Tom Frantz, President
Association of Irrigated Residents