



July 6, 2015

Mary Nichols  
Chair, California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

RE: AECA Comments on Sustainable Freight Action Plan

Dear Chair Nichols,

Thank you for the opportunity to comment on the Discussion Draft of the California Sustainable Freight Action Plan (Discussion Draft). The Agricultural Energy Consumers Association (AECA) is a nonprofit organization that represents the collective interests of the state's leading agricultural and dairy trade groups, including California Citrus Mutual, Western Growers Association, California Grape and Tree Fruit League, Milk Producers Council, California Dairies, Inc., California Poultry Federation, Almond Hullers and Processors Association, California Grain and Feed Association, Agricultural Council, Western Agricultural Processors Association, and California Cotton Ginners and Growers Association. Through its members and membership associations, AECA represents in excess of 40,000 California agricultural producers. Many of our members are vertically integrated and as a result, AECA also represents the interests of numerous food and fiber processing operations located throughout California.

AECA and the agricultural and dairy industries have worked closely with the Legislature, the California Air Resources Board, California Department of Food and Agriculture and other state agencies to develop opportunities for California's agriculture and dairy industries to help meet the state's ambitious greenhouse gas and short-lived climate pollutant goals. As part of those efforts, the Sustainable Freight Action Plan offers a unique opportunity for the agriculture, specifically the dairy industry to produce renewable natural gas that can be used to help the state's freight fleet to transition to cleaner burning fuels.

Utilization of organic waste, such as dairy manure, to create renewable fuels is fully consistent with the guiding principles outlined in the Discussion Draft. Investing technology, equipment and infrastructure to create renewable fuels at California dairies helps the state not only implement the Sustainable Freight Strategy, but also helps meet the short-lived climate pollutant and greenhouse gas reduction goals by capturing methane.

AECA strongly supports the Discussion Draft's identification of Dairy Biogas for Freight Vehicles in the San Joaquin Valley as a pilot project. AECA led the USAD study that identified the Kern dairy cluster as an ideal site to further develop and facilitate dairy methane reduction strategies in California. This type of pilot demonstration will help develop dairy industry participation in methane conversion. The project will deliver carbon negative fuel that is expected to have a carbon intensity value of -276 g/MJ. Equally important, the project will provide substantial NOx and PM criteria pollutant reductions and provide substantial benefits to air quality and disadvantaged communities.

The goal of the of a dairy biogas demonstration is to be a center of education, targeted research and experimentation, commercial demonstration and excellence that can be replicated elsewhere in

California. Expanded opportunities could include use of the dairy generated renewable natural gas to replace diesel used in farm equipment and as a source of hydrogen fuel.

With approximately 25 percent of the state's methane available for capture and conversion to RCNG at dairies, the dairy industry has the potential to be an important piece of the Sustainable Freight infrastructure plan in the San Joaquin Valley.

We strongly urge the proposal Dairy Biogas for Freight Vehicles in the San Joaquin Valley to be adopted with the final strategy. Further, we urge the ARB to fully fund and implement the project.

Sincerely,

A handwritten signature in blue ink that reads "Michael Boccadoro". The signature is written in a cursive, flowing style.

Michael Boccadoro  
Executive Director

