

November 23, 2015

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

**RE: California Sustainable Freight Action Plan: Pilot Project Ideas—Kern Dairy Biogas Cluster's R-CNG Sustainable Freight Pilot Project**

To Whom It May Concern:

The challenges faced by the San Joaquin Valley with respect to air quality are unmatched by any other region in the state of California. The Valley's topography, climate, geography, and the presence of two major transportation corridors connecting Northern and Southern California all contribute to the region's air quality problem. A number of Valley communities are highly impacted by both pollution burden and socioeconomic challenges. In fact, 23 out of the top 30 California disadvantaged communities identified through the state's CalEnviroScreen model are located in the San Joaquin Valley. These communities lack the resources necessary to effectively compete for state resources and as a result have not received the amount of state investment that wealthier more urban areas have. In order to meet attainment of increasingly stringent federal and state air quality standards the San Joaquin Valley Air Pollution Control District (District) has developed a Technology Advancement Program to identify, support, and fund advances in technologies necessary to help meet these important health based standards.

The District understands California Bioenergy LLC (CalBio), the project developer of Kern County Dairy Biogas Cluster (Kern Dairy Cluster), is proposing an innovative solution to the use of dairy biogas for the *California Sustainable Freight Action Plan: Pilot Project Ideas* request. As a hybrid of electricity generation with biogas to fuel, the Kern Dairy Cluster has the opportunity to demonstrate an important option for dairy biogas. The District considers the use of biogas as a renewable vehicle fuel one of the best uses of the gas from an air quality perspective, and is pleased to learn that CalBio is proposing to use biogas produced by the Kern Dairy Cluster as fuel along the Valley's important trade corridors.

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

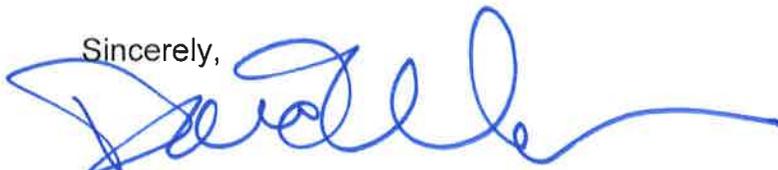
**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 861-392-5500 FAX: 861-392-5585

As the leading agricultural region in the country, a significant potential for biogas production will necessitate technological advancements to ensure that the capture and use of that potential does not hinder the District's efforts to attain important health based air quality standards. One California Energy Commission (CEC) publication estimates a potential generation of 450 MW of electricity from dairy digesters in the Valley. Even when using the Best Available Control Technology (BACT) for electricity generation the result would be an increase of approximately 2.7 tons of NO<sub>x</sub> emissions per day. If such growth in electricity production from dairy digesters were to occur it would offset many other investments made by Valley residents and businesses to reduce those emissions, and potentially delay attainment of national ambient air quality standards and the concomitant health benefits from attaining these standards. The District strongly supports projects and technologies that provide alternative options for the use of biogas that prevent the emissions from electric power production.

The Kern Dairy Cluster provides an opportunity to advance this hybrid electricity/fuel design since it is in a cluster of large dairies, and multiple dairies provide the economies of scale potentially needed to implement large scale biogas projects. It is also our understanding that CalBio has advanced the conversation with California Dairies, Inc., the largest California dairy coop, who work with milk truckers, the planned vehicle fuel users. A site along the I-5 is also being made available to the project by one of the CalBio partners. In addition to the avoided emissions from electricity generation, the replacement of diesel trucks with renewable natural gas powered trucks will reduce toxic diesel particulate matter and NO<sub>x</sub>, much of which occur in disadvantaged communities. The proposed project will demonstrate an important, innovative, and transformative cleaner option than electricity generation and encourage cleaner freight. Thus, the District strongly supports the advancement of this pilot project idea to meet the requirements of Executive Order B-32-15.

Sincerely,



for Seyed Sadredin  
Executive Director/APCO