

VIA ELECTRONIC SUBMISSION

August 23, 2024

The Honorable Liane Randolph

Chair, California Air Resources Board

P.O. Box 2815 Sacramento, CA 95812

Via electronic submission

Re: Comments on Proposed Amendments to the Low Carbon Fuel Standard Regulation

Dear Chair Randolph:

I am a California dairy farmer.

Based in large part on the new market for dairy biogas that was created by the CARB LCFS program, I agreed to build a digester on my dairy. We have been online since 2019, and our pathway application was approved in 2020, with the understanding that our digester could participate in the market for up to 30 years.

Now, after I made this commitment and the digester investment is irrevocable, CARB is changing the LCFS rules so that my dairy can claim avoided methane benefits for no more than 20 years, meaning that I have only 16 years left to operate this digester. So CARB is taking 10 years of profitability away after I have already made the investment.

Unless CARB restores the 30-year eligibility, I expect we and our industry partners will immediately freeze or cancel all future investments in the digester, including additional manure collection, biogas capacity upgrades, solar power supply, CO2 sequestration, additional manure treatment to reduce methane slip - or any other improvements - whose return is now at risk.

Please act immediately to restore our faith that it is safe to invest in renewable energy in California.

Sincerely,

Randy Gorzeman

Riverview Dairy

