

January 7, 2022

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Response to Public Comment – Tier 2 Pathway Application No. B0218

Dear Chair Rudolph,

Public comments were submitted during the 10-day public comment period for Degrees3 Transportation Solutions, LLC (“Degrees3”) Tier 2 Pathway for electricity from swine manure for use as transportation fuel in vehicles in California. Degrees3 wishes to provide written response to the Executive Officer for why the pathway holder believes that revisions to the fuel pathway application are not necessary.

Pursuant to §95488.7(d)(5)(A): “Only comments related to potential factual or methodological errors will require responses from the fuel pathway applicant.” The comments received were not related to any potential factual or methodological errors; however, Degrees3 has chosen to address the claims against the Low Carbon Fuel Standard (“LCFS”) program that incorrectly state adverse environmental damage resulting from the project.

Per the LCFS regulation section §95488.7(a)(2) and California Air Resources Board (“CARB”) guidance, Degrees3 submitted a thorough Life Cycle Assessment (“LCA”) report and support documents that outline the facility operations, life cycle greenhouse gas (“GHG”) emissions and Carbon Intensity calculator and summary. Unredacted copies of the LCA report, as well as a CARB-approved CA-GREET3.0 Model (“GREET Model”) for Anaerobic Digestion of Dairy and Swine Manure¹, and all supporting documents were submitted, reviewed, and approved by a third-party validation body and by CARB.

The GREET Model calculates the Carbon Intensity of the project for the GHG emissions associated with the manure management & collection practices of the farm and electricity production facility, including the number and type of livestock, manure management practices in the baseline and project scenarios, fossil fuel use in both scenarios, and any upgrades to the system in order to produce electricity for the fuel pathway. The

¹ https://www.arb.ca.gov/fuels/lcfs/ca-greet/tier1-dsm-calculator-corrected.xlsm?_ga=2.4599728.286421287.1632749331-323101621.1590687338

methodology follows the boundary defined in CARB's Compliance Offset Protocol for Livestock Projects ("Protocol"), which accounts for all GHG sources and sinks that are impacted by the project, including the avoided methane emissions that would have occurred in the absence of the project and the emissions generated throughout production of the transportation fuel.

The project was implemented voluntarily at all times and operates in conformance with all relevant CARB regulations. The voluntary installation and use of anaerobic digesters for GHG emission reductions as well as the stringent levels of methane monitoring for the avoidance of fugitive methane emissions at the facility fall within the operating conditions of the LCFS program, the facility's operating permits, and all applicable laws and regulations.

Finally, objections to livestock farming as a practice fall outside the scope of the pathway application, which is focused on the beneficial capture and use of otherwise emitted manure methane. Any LCFS credits generated by a facility that reduces its methane emissions are calculated strictly based on a comparison to the facility's baseline methane emissions, which represent what would have been emitted into the atmosphere in the absence of the biogas collection system.

Degrees3's responses to all public comment received are as stated above and Degrees3 is of the position that no revisions to fuel pathway B0218 are needed. We thank you for the opportunity to respond to comments on this fuel pathway application and we respectfully request that the Executive Officer certify the pathway pursuant to §95488.7(d)(5)(B).

Sincerely,



Julie Kelleher

Project Manager

Degrees3 Transportation Solutions, LLC