



Finding a better way

March 28, 2023

Steven Cliff, Executive Officer
California Air Resource Board
Low Carbon Fuel Standard
1001 I Street
Sacramento, CA 95814

Re: Tier 2 Pathway Application No. B0401; Response to William Brieger

Dear Mr. Cliff:

U.S. Venture, Inc. ("Pathway Applicant") is responding within the scope of the Low Carbon Fuel Standard ("LCFS") program §95488.7(d)(5)(A) to the commenter, William Brieger ("Commenter"), in email correspondence submitted March 12, 2023 regarding the Tier 2 Pathway Application (B0401) (the "Application").

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 public comments received on the Application are not related to factual or methodological errors and only provide suggestions for adding pathway approval requirements.

Notwithstanding the foregoing, Pathway Applicant will address the Commenter's email, identified by sections in **bold**, and respond to all comments raised by the Commenter. We believe that no revisions to our pending Application are needed following sufficient review and approval of our response by California Air Resource Board ("CARB").

Dairy biogas poses at least two environmental threats that could be addressed by adding conditions on pathway approval.

1. There be a robust leak detection and repair protocol to find and immediately fix gas leaks from the processing and upgrading equipment. Otherwise the leaks cancel other emission reductions.

Pathway Applicant's project operators perform daily walk-throughs and inspections, monitor the site pressure and flow, and perform an annual inspection using a FLIR methane detection device.

2. There be a condition that the dairy be operated in compliance with all local, state and federal environmental standards. Otherwise the dairy's neighbors are burdened by production of California fuel.

This Application focuses exclusively on the addition of a biogas upgrading facility at Swiss Valley Farms ("SVF") to collect and purify methane for beneficial use. SWV was established in 1980 and already utilized manure lagoons and an anaerobic digester prior to construction of the biogas upgrading facility in 2020. The addition of the biogas upgrading facility has not posed any added burdens on SWV's neighbors. Rather, the Pathway Applicant believes this pathway benefits communities and ecosystems in both California and, in this case, New York, through the avoided dairy farm emissions and the economic activity that surrounds the farm operations in New York, and the reduced emissions from vehicle fuels in California.



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In summary, while U.S. Venture, Inc. is thankful for the opportunity to address the Commenter for his interest in this project, we further contend that no changes to the pending Application under CARB review are required and see no reason to deny or stay a certification decision on this pathway.

Sincerely,



Michael L. Koel
President – U.S. Gain Division
U.S. Venture, Inc.