



**Joseph Sorena**

Fuels Policy Advisor, Fuels Regulations & Compliance

March 25, 2026

Narges Manavi  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Tier 2 Pathway Application No. B0788; Comment in Opposition to Tier 2 Pathway Application B0788**

Dear Ms. Manavi,

Chevron RNG Holdings LLC (“Pathway Applicant”) is responding within the scope of the Low Carbon Fuel Standard (“LCFS”) program §95488.7(d)(5)(A) to the commenters, Leadership Counsel for Justice & Accountability, Central Valley Defenders of Clean Water & Air, Food & Water Watch, Animal Legal Defense Fund, Simona Vanacek, and AJ Cho (collectively, “Commenters”), in a letter or comments (each submitted March 24, 2026) regarding the Tier 2 Pathway Application (B0788) (the “Application”).

Section §95488.7(d)(5)(A) of the LCFS states “only comments related to potential factual or methodological errors will require responses from the fuel pathway applicant.” We don’t believe the public comments received on the Application are related to factual or methodological errors and believe that the comments incorrectly claim adverse environmental damage results from the dairy manure project. Dairy manure projects result in significant long-term air quality improvements and greenhouse gas emission reductions through the use of RNG in transportation that displaces diesel trucking and the reduction of methane and other fugitive emissions from improved dairy manure management. Pathway Applicant will address the Commenters’ letter, identified by sections in *italics*, and respond to all comments raised by the Commenters. 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”).

**Comment 1:**

*First, the application incorporates an unlawfully truncated system boundary that ignores feedstock production at the source factory farm—Meadow Rock Dairy, LLC in Greenville, Michigan which confines a total of 3,660 cows—and other emissions such as those from storage and disposal of digestate, resulting in artificially low Carbon Intensity (CI) values and inflated credit generation. A fuel pathway life cycle analysis must take into account “feedstock production” and “waste generation, treatment and disposal.” In addition to the evidence provided in Exhibits A and B, more research indicates that emissions from factory farm gas production are significantly higher than currently appreciated, with especially high emissions from digestate storage. This recent study did not consider additional emissions from digestate handling and application, which is another potentially large source of emissions resulting from factory farm gas production that must be included in the pathway life cycle analysis. Yet, CARB and the pathway applicant ignore these and other emissions. In other words, this application dramatically undercounts the*

*greenhouse gas emissions associated with this fuel by failing to apply the required “well-to-wheel” analysis.*

*Concurrently, this application overcounts environmental benefits by ignoring that this is, in one factory farm owner’s words, “lucrative” feedstock production. Liquefied manure rotting anaerobically in massive waste “lagoons” that are never completely emptied is not an unavoidable and natural consequence of animal agriculture operations. This system and the methane emissions that it causes are the result of the source factory farm’s intentional management decisions designed to maximize profits and externalize pollution costs. CARB cannot ignore that the emissions the pathway applicant claims as captured from the factory farm’s lagoons are intentionally created in the first place. The manure handling practices at this facility are an integrated part of generating and using factory farm gas. Thus, the gas generated at this facility is an intentionally produced product and cannot now be claimed as “captured” to secure a lucrative negative CI value.*

**Response 1:**

The carbon intensities quantified in the pathway application process utilize a lifecycle analysis methodology which accounts for all emissions (including trucking) within the designated boundary based on the LCFS regulations during the operational time period. The CI score of the project incorporates baseline manure management practices and follows the life cycle analysis according to the guidance laid out in the 2014 California Livestock Projects Compliance Offset Protocol which includes project emissions from the storage and disposal of digestate. As a result of this process, the project shows avoided methane emissions from the baseline, resulting in the generation of credits by diverting methane from the farm. An approved third-party verifier confirmed the inputs, project boundary, and CA-GREET 3.0 model for the project’s CI score through a desktop analysis and site visit to ensure all emissions were accounted for. As noted in CARB’s Staff Summary, this facility has never participated in the California Cap-and-Trade Offset program, but additionally participates in the federal Renewable Fuel Standard Program.

**Comment 2:**

*Second, CARB has failed to ensure that the additionality requirements of Health and Safety Code section 38562 are met. Indeed, there is no evidence that CARB has investigated whether these purported emission reductions otherwise would occur. It does not appear that CARB has made any effort whatsoever to verify that these environmental attributes have not already been used elsewhere, such as in utility/consumer promotional programs in Michigan, other state low carbon fuels programs, or product marketing. CARB cannot certify this pathway without conducting this analysis.*

**Response 2:**

See Response 1 regarding participation in other low carbon fuel programs.

The California LCFS and other low carbon fuel programs have provided the incentives necessary for the inception and continued operation (and thus emission reductions) of this and other similar projects. The assumption that this project would deliver emission reductions without the LCFS is not supported. The capital and operating costs of digester system are significant and ongoing throughout the life of the project. Without these financial incentives, it is

more likely that these projects would not begin or cease to operate, and the dairies would revert to using their previous manure management practices including significant methane emissions.

**Comment 3:**

*Third, this application is a good example of how CARB's flawed approach is rewarding the biggest factory farm polluters and incentivizing further expansion and herd consolidation, which does more climate harm than good. The source factory farm is not a sustainable family farm—it is a large industrial operation that confines a total of 3,660 cows. CARB should not allow this factory farm—or the applicant—to profit from the LCFS.*

**Response 3:**

The above comment is not related to potential factual or methodological errors and therefore does not require a response from the fuel pathway applicant. The Pathway Applicant provided all the required information and supporting documentation necessary to certify the Tier 2 fuel pathway Application to both CARB staff and an approved third-party verifier.

It should be noted that what is currently Meadow Rock Dairy was originally established in 1998 by its current owners. Their main production output is milk and milk products, and dairy manure is a waste. The LCFS has not incentivized them to increase their herd size.

**Comment 4:**

*Fourth, this application is so opaque that it is impossible for Commenters or other stakeholders to meaningfully evaluate it. The lifecycle analysis redacts information critical to understanding the CI calculation.*

**Response 4:**

The Pathway Applicant met all of the pathway application requirements laid out in the regulation. This Application was reviewed by CARB staff and validated by the third-party verifier. The Pathway Applicants redactions were within CARB's guidance, approved by CARB, and minimal. The pathway Application included all aspects of the lifecycle analysis required by the LCFS.

**Comment 5:**

*Fifth, the inflated CI values CARB proposes work an additional environmental injustice on California citizens who will be exposed to higher levels of pollution from fossil transportation fuel and dirty vehicles made possible by excessive credit generation at factory farms. CARB has acknowledged that pollution from transportation fuels inflicts a racially disparate impact, so this continued certification of fuel pathways with extreme negative CI values to allow more pollution from deficit holders contributes to this injustice.*

**Response 5:**

The above comment is not related to potential factual or methodological errors and therefore does not require a response from the fuel pathway applicant. It should be noted all CARB guidance was followed to quantify the lifecycle emissions which includes the transport of the finished fuels. For CARB to achieve the emission reduction goals of a 90% CI reduction by 2045, it will be necessary for the transportation fuel mix to not only include zero emission fuels, but also carbon negative fuels.

**Comment 6:**

*As this application highlights, CARB's unlawful and unjust administration of the LCFS program is causing environmental and public health harms in California and elsewhere – in this case Michigan- by incentivizing and rewarding some of the worst factory farm practices by making them more "lucrative." If California is serious about being a climate leader, this is not the example to set.*

**Response 6:**

The LCFS program is a transportation GHG reduction policy that has resulted in significant decreases in conventional fuel consumption and GHG emissions from the transportation sector in California. Where the dairy farms are located, there are reduced methane and fugitive emissions from the use of digesters instead of uncovered anaerobic lagoons. Reductions of fugitive methane emissions is necessary to meet California, and overall United States climate goals.

**Comment 7:**

*I wish to urge CARB to rescind all permits for this application immediately. As a lifelong Californian, I do not trust fossil fuel companies like Chevron to offer solutions that will halt or even lower carbon emissions. Biogas is not an emission-free or renewable source, and Californians like me deserve robust energy grids built on renewables instead.*

**Response 7:**

The above comment is not related to potential factual or methodological errors and therefore does not require a response from the fuel pathway applicant.

**Comment 8:**

*I respectfully request that CARB review the following points for accuracy, completeness, and alignment with LCFS regulatory requirements:*

*Methane Capture and Avoided Emissions Assumptions*

*Dairy manure pathways rely heavily on assumptions about methane capture efficiency and avoided baseline emissions. Because real-world manure management practices vary significantly, I encourage CARB to verify that the baseline scenario and project scenario are accurately represented and do not overstate avoided methane emissions.*

**Response 8:**

See Response 1. The CI score of the project incorporates baseline manure management practices and follows the life cycle analysis according to the guidance laid out in the 2014 California Livestock Projects Compliance Offset Protocol which includes project emissions from the storage and disposal of digestate.

**Comment 9:**

*Transport-Related Emissions*

*This pathway includes trucking biogas to a pipeline injection site and transporting it to California. All transport-related emissions — including trucking, compression, and pipeline movement — should be fully accounted for, as they can materially affect the final carbon intensity score.*

**Response 9:**

See Response 1. The carbon intensities quantified in the pathway application process utilize a lifecycle analysis methodology which accounts for all emissions (including trucking) within the designated boundary based on the LCFS regulations during the operational time period. An approved third-party verifier confirmed the inputs, project boundary, and CA-GREET3.0 model for the project's CI score through a desktop analysis and site visit to ensure all emissions were accounted for.

**Comment 10:**

*Feedstock Sourcing Transparency*

*Dairy manure feedstock characteristics can vary based on herd size, manure handling, and digester operation. I encourage CARB to ensure that the feedstock sourcing information is complete, verifiable, and consistent with LCFS requirements, particularly regarding manure that may already be managed in ways that reduce methane emissions.*

**Response 10:**

See Response 1. The carbon intensities quantified in the pathway application process utilize a lifecycle analysis methodology. An approved third-party verifier confirmed the inputs, project boundary, and CA-GREET3.0 model for the project's CI score through a desktop analysis and site visit to ensure all emissions were accounted for.

**Comment 11:**

*Avoiding Double-Counting of Environmental Benefits*

*Dairy digester projects may receive incentives from multiple programs. I recommend confirming that no avoided emissions or environmental benefits are being counted more than once across programs or regulatory frameworks.*

**Response 11:**

See Response 1. As noted in CARB's Staff Summary, this facility has never participated in the California Cap-and-Trade Offset program, but additionally participates in the federal Renewable Fuel Standard Program as allowed in the LCFS Regulation. The carbon intensities quantified in the pathway application process utilize a lifecycle analysis methodology which accounts for all emissions (including trucking) within the designated boundary based on the LCFS regulations during the operational time period.

**Comment 12:**

*Community and Environmental Justice Considerations*

*Although Tier 2 pathways focus on carbon intensity, dairy manure projects can have localized impacts on surrounding communities. I encourage CARB to ensure that the project complies with all applicable environmental justice and air-quality protections in the host region.*

**Response 12:**

The facility operates under the publicly posted air permit under Michigan Department of Environment, Great Lakes and Energy (EGLE).

In summary, Chevron RNG Holdings LLC believes that no changes to the pending Application under CARB review are required and sees no reason to deny or stay a certification decision on this pathway.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Sorena", with a long horizontal flourish extending to the right.

Joseph Sorena  
Fuels Policy Advisor, Fuels Regulations and Compliance