



Elizabeth Tucker
RNG Business Execution Manager

August 17, 2026

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

Re: Response to Comments to Tier 2 Pathway Application B0901

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 comments submitted by (i) the Animal Legal Defense Fund (on behalf of the organizations listed in its submission), dated July 30, 2026, and (ii) Jeremiah Maller, dated July 21, 2026 (singularly and collectively, "Comments" and "Commenters") regarding Pathway Applicant's Tier 2 Pathway Application (B0897) ("Application").

Section §95488.7(d)(5)(A) of the LCFS provides that "only comments related to potential factual or methodological errors will require responses from the fuel pathway applicant." However, the Comments received on the Application are not within the scope of §95488.7(d)(5)(A) since they are unrelated to factual or methodological errors and merely repeat inaccurate generalized complaints about dairy manure projects. In fact, dairy manure projects result in significant long-term air quality improvements and greenhouse gas emission reductions through the use of RNG as a transportation fuel that displaces the use of diesel fuel for trucking and the reduction of methane and other fugitive emissions from improved dairy manure management.

To the extent the Comments are considered within the scope of §95488.7(d)(5)(A), Pathway Applicant has addressed each of the Comments (which are quoted below in italics) and respectfully submits that no revision to the Application is required, and that the Application should be approved by the California Air Resource Board ("CARB").

Comment 1:

"First, the application incorporates an unlawfully truncated system boundary that ignores feedstock production at the source factory farms—Larson Dairy Barn 5 and Larson Dairy Barn 8 in Okeechobee, Florida which together confine a total of 6,400 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 recent 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 applicants 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.⁶ Liquified manure rotting anaerobically in massive waste “lagoons” that were 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 farms’ intentional management decisions designed to maximize profits and externalize pollution costs. CARB cannot ignore that the emissions the pathway applicants claim as captured from the factory farms’ lagoons are intentionally created in the first place. The manure handling practices at these factory farms are an integrated part of generating and using factory farm gas. Thus, the gas generated at these facilities is an intentionally produced product and cannot now be claimed as “captured” to secure lucrative negative CI values.”

Response 1:

The carbon intensities quantified in the pathway application process utilize a lifecycle analysis methodology which accounts for all emissions 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 Florida, 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 would cease to operate, and the dairies would revert to using their previous manure management practices resulting in increased 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 farms are not sustainable family farms—they are large industrial operations that confines a total of 6,400 cows. CARB should not allow these factory farms—or the applicants—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 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.

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 calculations.”

Response 4:

The Pathway Applicant met all of the pathway application requirements established by the regulation. This Application was reviewed by CARB staff and validated by the third-party verifier. The Pathway Applicant’s redactions were within CARB’s guidance, approved by CARB, and minimal. The 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 Pathway Applicant. It should be noted that all CARB guidance was followed to quantify the lifecycle emissions which includes the transport of the finished 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 Florida—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 above Comment is not related to potential factual or methodological errors and therefore does not require a response from the Pathway Applicant.

Comment 7:

“Baseline and additionality

The applications should identify the exact no-project manure-management baseline used for each of the four barns, including historical lagoon practices, manure quantities, retention times, temperatures, herd sizes and methane-conversion assumptions.

The calculations may contain a methodological error if they assume that all covered manure would otherwise remain indefinitely in uncovered anaerobic lagoons and that all modeled methane would necessarily escape. Liquid-lagoon storage is a management choice, not an unavoidable natural condition. Chevron should compare the project with reasonably available lower-methane manure-management alternatives, not only continued use of the highest-emitting practice.

Additionality is particularly important because the Sobek project was publicly announced and construction began in 2020. Chevron and Brightmark announced delivery of the project’s first RNG in August 2023, years before these 2026 pathway reviews. The project was described as consisting of four lagoon anaerobic digesters at Larson family farms.

Chevron should therefore disclose:

- * when the investment decisions were made;*
- * whether anticipated LCFS revenue was included in project financing;*
- * whether the digesters would continue operating without these credits;*
- * the requested crediting start dates;*
- * whether credits are sought for fuel produced before certification; and*
- * what additional emission reductions approval would cause.*

It would be incorrect to calculate credits using a counterfactual in which these existing digesters do not operate unless Chevron provides evidence supporting that assumption.”

Response 7:

See responses 1, 2, and 4.

Comment 8:

“Herd size, manure quantities and facility allocation

Chevron should disclose historical and current herd counts, manure production and digester throughput separately for Barns 3, 4, 5 and 8.

The applications should clarify:

- * whether herd sizes increased following project development;*
- * whether manure is imported from other barns or dairies;*
- * whether manure or gas moves between the two facilities;*
- * whether the four digesters share gathering, upgrading or pipeline equipment;*
- * how gas and emissions are allocated among the four barns; and*
- * how shared equipment emissions are divided between B0897 and B0901.*

Avoided-methane crediting should be capped at a fixed, verified historical herd and manure baseline. Manure resulting from herd expansion, dairy consolidation, imported waste or changes intended to increase gas production should not generate additional LCFS credits.

Without such a cap, the methodology creates a perverse incentive: more manure creates more modeled baseline methane, potentially producing a more negative carbon-intensity score and additional credits.

Public permitting information indicates that the RNG operations at Larson Dairy are located at Barns 5 and 8, with a digester and flare at each barn and the biogas-upgrading unit located at Barn 5. Chevron should disclose whether that upgrading unit also processes gas associated with JM Larson Barns 3 and 4 and, if so, how its energy use, methane losses and output are allocated.

CARB should require a combined project diagram and mass balance covering all four digesters. Reviewing B0897 and B0901 as if they were isolated projects could conceal incorrect allocation or duplicate attribution."

Response 8:

See responses 1, 2, and 4.

Comment 9:

"Lifecycle boundary and measured methane performance

The claimed climate benefit depends heavily on methane-capture efficiency. Small errors in leakage, digester uptime or digestate emissions could materially alter the pathways' carbon intensities.

Chevron should disclose whether each calculation includes:

- * manure collection and pumping;*
- * digester heating and electricity;*
- * equipment downtime and bypass events;*
- * routine and emergency flaring;*
- * leakage from digesters, piping and upgrading equipment;*
- * methane rejected during upgrading;*
- * digestate and effluent-storage emissions;*
- * digestate land application;*
- * compression and pipeline losses;*
- * LNG processing and transportation;*
- * refueling losses; and*
- * end-use methane slip.*

Following a CARB calculator does not itself establish that all material real-world emissions have been captured.

Chevron should provide measured data for gross biogas production, methane concentration, upgraded gas output, flaring, venting, fugitive leakage, downtime and methane remaining in digestate.

CARB should require direct monitoring, annual reconciliation of modeled and measured performance, and downward adjustment of credits when actual methane capture is worse than assumed. Measurements should be reported separately for the four digesters wherever feasible so that poor performance at one barn is not obscured by aggregated project data."

Response 9:

See responses 1, 2, and 4.

Comment 10:

"Eight of the 12 proposed pathways require additional processing beyond pipeline delivery: four LNG pathways and four L-CNG pathways.

For B089702, B089705, B090102 and B090105, Chevron should quantify all emissions from liquefaction at the Clean Energy Boron LNG Plant, including:

- * electricity and fuel consumption;*
- * refrigeration and pretreatment;*
- * methane loss during liquefaction;*
- * boil-off gas;*
- * venting and flaring;*
- * storage and loading losses;*
- * truck mileage and payload;*

- * empty return trips; and
- * unloading and dispensing losses.

The inputs should reflect current, facility-specific operation of the Boron plant rather than generic LNG assumptions.

For B089703, B089706, B090103 and B090106, Chevron should separately quantify the additional energy and emissions required to use LNG as L-CNG, including pumping, vaporization or conditioning, recompression, storage and boil-off management.

The applications should also identify the assumed vehicle engines and duty cycles and include real-world methane slip, fuel-system leakage and refueling losses.

The direct-pipeline, LNG and L-CNG routes should have distinct calculations. Omitting or understating these additional stages would materially understate the pathways' carbon intensities."

Response 10:

See responses 1, 2, 4, and 5.

Comment 11:

"Delivery claims, pathway allocation and double counting

All 12 pathway descriptions state that Florida RNG is "pipelined to CA." Chevron should clarify whether physical gas is demonstrably transported through an interconnected pipeline route to California or whether renewable attributes are assigned to California through book-and-claim accounting.

Public descriptions state that the project's gas enters the Peoples Gas pipeline system in Florida. If physical methane is not traced to California, describing it simply as "pipelined to CA" may be factually misleading. The calculations should reflect the actual physical and contractual arrangement.

Chevron must also demonstrate how the same gas cannot be credited under multiple applications or pathways. Required controls should include:

- * meters at each digester and upgrading facility;
- * a combined monthly mass-and-energy balance;
- * pipeline nominations;
- * LNG production and loading records;
- * fuel-delivery and dispensing records;
- * pathway-specific environmental-attribute tracking; and
- * procedures for reconciling discrepancies.

This is especially important because B0897 and B0901 divide one publicly described four-digester project into two applications and 12 alternative pathways.

Chevron should also identify federal Renewable Fuel Standard credits, tax benefits, grants, utility incentives, voluntary carbon credits and corporate claims associated with the project. Multiple financial incentives are not automatically double counting, but the same avoided methane, renewable attribute or lifecycle reduction must not be claimed more than once."

Response 11:

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

Comment 12:

"Transparency and consistency with public claims

The public must have enough information to evaluate the calculations meaningfully. Chevron should disclose, or provide useful ranges for:

- * herd counts and manure quantities;*
- * baseline lagoon assumptions;*
- * gas production by barn;*
- * methane-capture efficiency;*
- * leakage and flare activity;*
- * upgrading energy and losses;*
- * transportation distances;*
- * digestate management;*
- * allocation between B0897 and B0901;*
- * allocation among the 12 pathways; and*
- * requested crediting dates.*

Third-party verification is not a substitute for public transparency. A Tier 2 public-comment process is undermined when the inputs necessary to identify errors are withheld.

Chevron should also reconcile the two applications with previous public statements that the combined Sobek project would produce approximately 171,000 MMBtu annually and avoid approximately 57,400 metric tons of greenhouse-gas emissions each year.

CARB should require a combined table showing:

- * total project gas production;*
- * production attributed to each barn;*
- * fuel volumes attributed to B0897 and B0901;*
- * avoided methane;*
- * lifecycle project emissions;*
- * carbon intensity for each pathway; and*
- * expected LCFS credit generation.*

The totals across both applications should reconcile with measured project production and should not exceed the project's physical output."

Response 12:

See response 4. To the extent the Comment is referring to projections contained in a different company's press release issued in 2020 announcing its commencing of construction of the project, the Comment is not relevant to Pathway Applicant or its 2026 Application.

Comment 13:

"Broader opposition and requested action

Even if individual calculation errors are corrected, I strongly oppose using the LCFS to provide large, long-term subsidies for dairy-manure RNG.

Negative carbon-intensity scores arise primarily from a modeled assumption that methane would otherwise be released. Burning the RNG does not itself remove carbon from the atmosphere. This accounting can reward continued use of methane-producing lagoons, increase the financial value of manure and encourage larger concentrated dairy operations.

Digesters also do not resolve ammonia, odors, nutrient pollution, groundwater risks, digestate disposal, truck traffic or other harms associated with industrial dairies.

California transportation policy should prioritize zero-emission vehicles, charging infrastructure, public transportation and reduced petroleum use. Subsidizing pipeline gas, LNG trucking, CNG engines and related infrastructure risks extending reliance on combustion and diverting LCFS value away from electrification.

*These applications would use California transportation credits to support manure management at an existing Florida project that began producing gas years before pathway certification. California may receive little or none of the local air- and water-quality benefits, while the credits can allow fossil-fuel suppliers to comply without equivalent reductions in California transportation emissions.
I therefore **strongly oppose Applications B0897 and B0901 and pathways B089701–B089706 and B090101–B090106 as submitted”*

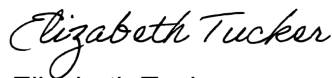
Response 13:

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In summary, Chevron RNG Holdings LLC respectfully submits that the Comments do not require any changes to the pending Application or grounds to deny or stay a CARB certification decision on this pathway.

Sincerely,



Elizabeth Tucker
RNG Business Execution Manager