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 31, 2026, and (ii) Jeremiah Maller, dated July 21, 2026 (singularly and collectively, "Comments" and "Commenters") regarding Pathway Applicant's Tier 2 Pathway Application (B0901) ("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 3 and Larson Dairy Barn 4 in Okeechobee, Florida which together confine a total of 3,640 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.4 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.5 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. 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 3,640 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 application should identify the exact no-project manure-management baseline used to calculate avoided methane, including historical lagoon practices, manure quantities, retention times, herd sizes, temperatures and methane-conversion assumptions.
The calculation may contain a methodological error if it assumes that all covered manure would otherwise remain indefinitely in an uncovered anaerobic lagoon and that all modeled methane would necessarily escape. Liquid lagoon storage is a management practice, not an unavoidable natural condition. Chevron should compare the project with reasonably available lower-methane manure-management alternatives, not only with continued use of the highest-emitting practice.
Additionality is particularly important because public project announcements indicate that construction began in 2020 and that the project began producing RNG in 2023, years before this 2026 pathway review.
Chevron should therefore disclose:
** when the investment decision was made;*
** whether anticipated LCFS revenue was included in project financing;*
** whether the project would continue operating without LCFS credits;*
** whether credits are sought for fuel produced before certification; and*
** what new reductions approval of B0901 would cause.*
It would be factually and methodologically incorrect to use a counterfactual in which the already-operating digesters do not exist or stop operating unless Chevron provides evidence supporting that assumption.
CARB should not award credits for reductions that were already occurring, already financed or already legally or contractually required."

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 and 4.
The application should also clarify:
** whether herd size increased after project development;*
** whether manure is imported from other barns or dairies;*
** whether manure or gas is transferred among Larson facilities;*
** how gas volumes are assigned to each barn and pathway; and*
** how emissions from shared equipment are allocated.*
Avoided-methane crediting should be capped at a fixed, verified historical herd and manure baseline. Additional manure resulting from herd expansion, dairy consolidation, imported waste or operational changes intended to increase gas production should not receive additional LCFS credits.
Without such a cap, the methodology creates a perverse incentive: producing more manure generates more modeled baseline methane, which can produce a more negative carbon-intensity score and more credits.
CARB should also require a project diagram and complete mass balance showing manure inputs, biogas production, methane concentration, upgrading losses, pipeline injection and fuel output for each covered facility. Inadequate allocation among barns,

digesters or related Larson facilities could lead to incorrect attribution or double counting."

Response 8:
See responses 1, 2, and 4.

Comment 9:
"Lifecycle boundary and measured methane performance
The claimed benefit depends heavily on methane-capture efficiency. Small errors in leakage, digester uptime or digestate emissions could materially alter the pathway's carbon intensity.
Chevron should disclose which lifecycle emissions are included and excluded, including:
** 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 gas upgrading;*
** digestate storage and land application;*
** effluent-pond methane;*
** compression and pipeline losses;*
** refueling losses; and*
** end-use methane slip.*
In prior dairy-RNG pathway proceedings, environmental organizations have challenged the exclusion or understatement of digestate emissions, lagoon emissions and other portions of the well-to-wheel lifecycle. Following CARB's calculator does not establish that all material real-world emissions have been captured.
Chevron should provide actual measurements of:
** gross biogas production;*
** methane concentration;*
** upgraded gas output;*
** flare volumes;*
** vented gas;*
** fugitive leakage;*
** downtime; and*
** methane remaining in digestate.*
CARB should not rely primarily on default leakage or capture assumptions. Certification should require direct monitoring, annual reconciliation of modeled and measured methane performance and downward adjustment of credits when actual performance is worse than assumed."

Response 9:
See responses 1, 2, and 4.

Comment 10:
"*LNG and L-CNG accounting*
The direct-pipeline, LNG and L-CNG pathways involve materially different processing and transportation chains. They should not receive similar carbon-intensity results unless facility-specific data demonstrate that result.
For B090102 and B090105, Chevron should quantify all emissions associated with liquefaction at the Clean Energy Boron LNG Plant, including:

** electricity and fuel consumption;*
** pretreatment and refrigeration;*
** methane loss during liquefaction;*
** boil-off gas;*
** venting and flaring;*
** storage and loading losses;*
** truck mileage;*
** empty return trips; and*
** unloading and dispensing losses.*
These inputs should reflect current operations at the Boron facility rather than generic LNG assumptions.
For B090103 and B090106, Chevron should separately quantify the additional energy and emissions required to use transported LNG as L-CNG, including pumping, vaporization, recompression, storage and boil-off management.
The application should also identify the vehicle engines and duty cycles assumed and include real-world methane slip, fuel-system leakage and refueling losses.
Omitting or understating any of these stages would create a methodological error. The direct-pipeline route should ordinarily have a lower lifecycle burden than a route requiring liquefaction and trucking, while L-CNG should reflect its additional conversion stage."

Response 10:
See responses 1, 2, 4, and 5.

Comment 11:
"*Delivery claims, pathway allocation and double counting*
The pathway descriptions state that Florida RNG is "pipelined to CA." Chevron should clarify whether physical gas is demonstrably delivered through an interconnected pipeline route to California or whether conventional gas is withdrawn in California while the renewable attributes are assigned through book-and-claim accounting.
If the physical methane is not traced to California, describing it simply as "pipelined to CA" may be factually misleading. The calculation should reflect the actual contractual and physical arrangement, including appropriate compression, transmission and leakage assumptions.
Because B0901 proposes six alternative pathways, Chevron must also demonstrate how it prevents the same MMBtu of gas from being credited under more than one pathway. Required controls should include pathway-specific meters, pipeline nominations, LNG loading records, delivery records, dispensing records and an auditable environmental-attribute tracking system.
Chevron should identify all other programs supporting the project, including federal Renewable Fuel Standard credits, tax benefits, utility incentives, grants, voluntary carbon markets and corporate climate claims.
Receiving multiple financial incentives is not automatically double counting. However, the same avoided methane, renewable attribute or lifecycle reduction must not be claimed by multiple parties or programs.
CARB should require a complete chain of environmental-attribute ownership extending from the dairy through Chevron, the pipeline, the LNG plant, fuel distributors and the entity reporting the fuel under the LCFS."

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 prior public claims*
The public must have enough information to evaluate the calculation meaningfully. Chevron should publicly disclose, or provide usable ranges for:
** herd counts;*
** manure quantities;*
** manure fractions;*
** baseline lagoon assumptions;*
** gas production;*
** methane-capture efficiency;*
** leakage;*
** energy consumption;*
** transportation distances;*
** digestate management;*
** allocation among 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 factual or methodological errors are withheld.
Chevron should also reconcile B0901 with previous public statements that the Sobek project would produce approximately 171,000 MMBtu annually and avoid more than 57,000 metric tons of greenhouse-gas emissions each year.
CARB should require a table comparing those public estimates with:
** the fuel volume covered by B0901;*
** the avoided methane used in the application;*
** the number of barns and digesters included;*
** total project emissions;*
** the resulting pathway carbon intensities; and*
** expected LCFS credit generation.*
Material inconsistencies should be explained and supported with current operating data."

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 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. The fuel itself does not remove carbon from the atmosphere when burned. This accounting can reward continued reliance on methane-producing manure 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 environmental and community harms associated with industrial dairies.
California's transportation policy should prioritize zero-emission vehicles, charging infrastructure, public transportation and reduced petroleum use. Subsidizing pipeline gas, LNG trucking, CNG engines and related combustion infrastructure risks extending dependence on methane-burning vehicles and diverting LCFS value away from genuine transportation electrification.
*This application would also use California transportation credits to support manure management at a Florida dairy project that was constructed years ago. California may receive little or none of the associated local air- or water-quality benefits, while the resulting credits can allow fossil-fuel suppliers to continue generating deficits elsewhere. I therefore **strongly oppose B0901 and pathways B090101 through B090106 as submitted**.*"

Response 13:
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.

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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

Elizabeth Tucker
RNG Business Execution Manager