

**Form Letter 1 for Comment 242 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

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Subject: Comments on the October 1, 2024 CARB Low Carbon Fuel Standard 15-Day Changes  
Comment:

Carbon TerraVault Holdings, LLC ("CTV") appreciates the opportunity to comment on the California Air Resources Board's ("CARB" or "the Board") proposed amendments to the Low Carbon Fuel Standard ("LCFS"), released on October 1, 2024 (the "15-Day Changes"). CTV believes that the proposed modifications to LCFS credit generation for hydrogen projects introduces significant uncertainty and ambiguity, putting multibillion dollar industry-wide investment in H2 at risk. CARB must modify the 15-Day Changes or risk suppressing California's nascent low-carbon hydrogen industry. Please see detailed comments on the attached letter.

Attachment:

Original File Name: CTV Comments on 2nd 15-day LCFS package 10162024.pdf

Date and Time Comment Was Submitted: 2024-10-16 12:51:52