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March 15, 2023

The Honorable Liane Randolph
Chair California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chair Randolph,

Thank you for the opportunity to submit comments in response to the February 22, 2023 Public Workshop regarding potential changes to the Low Carbon Fuel Standard (LCFS).

CARB has shown leadership in designing and implementing a Low Carbon Fuel Standard, which incorporates carbon intensity into the program. California's 2022 Scoping Plan target of achieving carbon neutrality by 2045 is laudable.

California has led the country in reducing the carbon intensity of its transportation fuel over the past twelve years. In order to achieve carbon neutrality within the next twenty-two years, it is important to accelerate near-term reductions. Adhering to a 35% reduction by 2030 - proposed at the Scoping Plan Workshop on November 9th - will increase the chances of achieving the long-term goal of a 90% reduction by 2045.

CARB's recognition of avoided methane emissions has successfully led to the covering of many open livestock manure lagoons, and recognition of the lowest carbon intensity fuel. Continuing the recognition of avoided emissions until 2045 will help California achieve its goal of carbon neutrality, and lead to real emissions reductions through more agricultural digester projects.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Drasher".

Peter Drasher
President