



April 14, 2025

SUBMITTED ELECTRONICALLY AT:

[www.arb.ca.gov/lispub/comm/iframe\\_bcsbform.php?listname=lcfs2024](http://www.arb.ca.gov/lispub/comm/iframe_bcsbform.php?listname=lcfs2024)

**Re: Third Notice of Public Availability of Modified Text and Availability of Additional Documents and Information for the Proposed Low Carbon Fuel Standard Amendments**

To Chair Randolph, Honorable Members of the California Air Resources Board (“CARB”), and Staff,

Rivian Automotive, LLC, (“Rivian”) appreciates the opportunity to submit comments in response to the additional modifications released on April 4, 2025, to the proposed Low Carbon Fuel Standard (“LCFS”) amendments. **Rivian remains strongly supportive of both the LCFS and the rulemaking CARB undertook in 2024 to update the regulation.**

We acknowledge the staff’s additional modifications in response to feedback from the Office of Administrative Law, and we thank CARB for its continued dedication to this critical policy. While Rivian is disappointed that the modifications remove language allowing EV manufacturers to share in residential base credit generation, we appreciate the need to resolve OAL’s questions regarding that provision of the amendments. In place of allocating base credits to automakers, Rivian supports the EV purchase rebate for medium- and heavy-duty (“MHD”) fleets and applauds the clarification in these modifications that “high priority and federal fleets,” as defined for purposes of the Advanced Clean Fleets regulation, will be eligible. This rebate promises to be an important tool in accelerating the electrification of the MHD market.

**At this stage, we believe the priority should be the expeditious finalization and implementation of the modified LCFS amendments.** As recent softness in credit prices suggests, the market is asking for certainty. Resolving this rulemaking—and making



these amendments effective as soon as possible—is paramount for supporting the state’s ambitions to decarbonize the transportation sector.

To that end, Rivian reiterates its thanks to the staff and to the members of the Board for their continued support of the LCFS. We are grateful for everyone’s steadfast efforts to finalize this rulemaking. We look forward to the implementation of the amendments and continuing to participate in the LCFS market.

Sincerely,

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