



Matthew Botill
California Air Resources Board
1001 I Street
Sacramento, California 95814

April 21, 2025

Re: RNG Coalition's Comments on Low Carbon Fuel Standard Third 15-Day Amendments

Dear Mr. Botill:

The Coalition for Renewable Natural Gas (RNG Coalition) is a California-based nonprofit organization representing and providing public policy advocacy and education for the Renewable Natural Gas (RNG) industry.¹

RNG Coalition respectfully submits these comments to the California Air Resources Board (CARB) in response to the April 4, 2025, Third Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information Proposed Low Carbon Fuel Standard (LCFS) Amendments (Third 15-Day Package).

CARB and OAL Should Move Swiftly to Restore Investment Certainty for Clean Fuels

RNG Coalition remains a strong supporter of the LCFS program. Put simply, the LCFS framework works, and the availability of clean fuels incented by the LCFS has exceeded historical expectations. RNG development is one of the first major low carbon fuel industries built primarily around the LCFS program. We have only been successful because of CARB's prior strong commitment to clean fuels.

Transportation remains the largest sector of greenhouse gas (GHG) emissions in California, and additional deployment of a variety of low carbon fuel supply is clearly feasible. The only barrier hobbling the program's continued success is the regulatory delay in enhancing overall program ambition. Given the LCFS credit surpluses, a significant step-down in the Annual Carbon Intensity (CI) Benchmarks cannot be delayed any further. **At this stage, the top priority should be the expeditious finalization and 2025 Q1 implementation of the target step down.**

¹ For more information see: <http://www.rngcoalition.com/>



All parties received adequate notice throughout this extended rulemaking process and are prepared for implementation of the new rule, effective at the start of the 2025.

Few, if any, parties could have anticipated changes requested by the Office of Administrative Law (OAL). Clean fuel credit generators—such as RNG producers—should not be punished with any further administrative delays to the rule. Obligated parties (deficit generators) are all well informed about the rule changes and further delays are not necessary.

Conclusion

At current LCFS prices—and in the face of the programmatic uncertainty created by more than four years² of discussion on this rulemaking—new RNG projects driven by the LCFS will be extremely limited until this rule is finalized.

Finalizing the rule will restore investment certainty, leverage renewable gas production to reduce methane emissions, improve organic waste management, and decarbonize California's transportation sector. We thank CARB for your continued work and look forward to the swift conclusion of this rulemaking.

Sincerely,

Sam Wade

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² We note that our comment letter on the October 2020 Workshop discussed the need for more ambitious targets and requested that the rule be in effect by Jan 2024, available here:
<https://www.arb.ca.gov/lists/com-attach/48-lcfs-wkshp-oct20-ws-WmhRZ11tB2VY1Vg.pdf>