



April 21, 2025

Rajinder Sahota, Deputy Executive Officer  
Low Carbon Fuel Standard Program  
California Air Resources Board  
1001 I St.  
Sacramento, CA 95814

**RE: American Biogas Council Comments on the Release of the Third 15-Day Changes**

Dear Ms. Sahota

The American Biogas Council (ABC) appreciates the opportunity to comment on the recently released 15-day package for the Low Carbon Fuel Standard (LCFS). The ABC is the voice of the U.S. biogas industry dedicated to maximizing carbon reduction and economic growth using biogas systems. We represent more than 400 companies in all parts of the biogas supply chain that are leading the way to a better future by maximizing all the positive environmental and economic impacts biogas systems offer when they are used to recycle organic material into renewable energy and soil products.

Since its implementation in 2011, the LCFS has become a highly successful flagship policy that drives investments in low carbon fuels and delivers millions of tons of reductions in greenhouse gases (GHG) to meet California's statutory climate commitments. The LCFS is the hallmark of effective environmental policy in that it: 1) sets clear, science-based targets; 2) establishes clear regulations for program implementation; and 3) provides the market with flexibility to innovate.

The recent administrative disapproval of the program's amendments from the Office of Administrative Law (OAL) has unfortunately delayed the implementation of these vital amendments. The ABC would like to underscore the importance of concluding this rulemaking as soon as possible. Any further delay to the rulemaking diminishes the necessary signal the market needs to facilitate and encourage the continued investments in clean fuels. Without a strong policy signal, the state risks missing opportunities to further reduce GHG emissions from transportation fuels. Thus, the ABC strongly encourages CARB to swiftly address the concerns laid out in the disapproval, resubmit the package to OAL, and begin implementation of the new amendments promptly.

Thank you to the staff for their hard work and for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Serfass".

Patrick Serfass, Executive Director

CC:

Matthew Botill, Division Chief, Industrial Strategies Division  
Jordan Ramalingam, Manager, Alternative Fuels Section  
Dillion Miner, LCFS Program