



April 21, 2025

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

RE: CALSTART Comments on the Release of the Third 15-Day Changes

**Clean Transportation
Technologies and Solutions**

www.calstart.org

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CALSTART would like to thank CARB staff for the opportunity to comment on the recently released 15-day package for the Low Carbon Fuel Standard (LCFS). Since 2011, the LCFS has successfully allowed California to decrease the carbon intensity (CI) of the state's fuel pool and accelerate new technology and alternatives to petroleum fuel. The LCFS has also served as an extremely valuable incentive program, helping advance zero-emission vehicles (e.g., cars, trucks, and buses) and infrastructure adoption in the state. As described below, CALSTART strongly encourages CARB to expeditiously finalize the rulemaking and initiate implementation of the amendments.

CALSTART, headquartered in California, is a globally renowned 501(c)3 nonprofit organization dedicated to the advancement of zero emission vehicle and infrastructure technology. With a global member consortium of nearly 300 technology, government, industry, and community partners, CALSTART has worked for 30+ years to accelerate the commercialization and deployment of advanced technologies and solutions. Through policy development, incentive program administration, and first-of-its-kind deployment partnerships, CALSTART has designed and managed programs that drive the market for clean transportation technologies needed to achieve critical greenhouse gas and criteria pollutant emission reduction goals.

Over the course of two years, CARB staff have been working diligently to amend the LCFS and make critical changes that will ensure the program's continued success. CALSTART supports these amendments. While the non-substantive and administrative disapproval of the amendments from the Office of Administrative Law (OAL) has unfortunately delayed the implementation of these much needed amendments, CALSTART would like to urge CARB to swiftly address the concerns presented in OAL's disapproval notice, resubmit the package for approval, and begin implementation of the program asap. Any further delay jeopardizes the state's climate goals and investment in clean fuels including zero-emission technologies.

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

Sincerely,
Trisha Dello Iacono
Head of Policy

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

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