



To: California Air Resources Board
From: Jeremy Martin
Date: April 21, 2025
Subject: Comments on Low Carbon Fuel Standard April 2025 15-day changes

Thank you for the opportunity to comment on this important regulation. The vast majority of the changes proposed are appropriate clarifications and are responsive to the problems identified by the Office of Administrative Law (OAL).

However, the changes in subsection 95482(h) that make fossil hydrogen with carbon capture and sequestration eligible for the 80 percent renewable hydrogen (CCS) renewable hydrogen requirement by 2030 is a substantial policy change. It is not appropriate to make such a change without stakeholder feedback and Board approval.

Board resolution 24-14 directs the Executive Office to monitor hydrogen fuel availability and to report back and propose any adjustments to the Board as part of the next scoping plan update. This language does not authorize the Executive Office to make changes to the regulation without Board approval.

We suggest this change be removed and changes to the regulation following the board vote be limited to addressing issues raised by OAL.