



Dairy Cares Comments on the Proposed Low Carbon Fuel Standard Amendments (Third Set of 15-Day Changes)

April 21, 2025

Dairy Cares¹ appreciates the opportunity to provide these comments on the third notice of public availability of modified text and availability of additional documents and/or information pertaining to the California Air Resources Board's ("CARB") proposed Low Carbon Fuel Standard ("LCFS") amendments. Dairy Cares represents the California dairy sector, including dairy producer organizations, leading cooperatives, and major dairy processors.

Dairy Cares generally supports CARB's Third Set of 15-day Changes which respond to the Office of Administrative Laws ("OAL") Decision of Deficiency. We appreciate CARB's thoughtful responses to the OAL to ensure this rulemaking process timely concludes. In that vein, we urge CARB to respond continual stakeholder commentary throughout the rulemaking emphasizing the need for regulatory resolution as soon as feasibly possible. For example, the Final Statement of Reasons responds to significant stakeholder support in the efficient resolution of the rulemaking process. CARB should seek to implement the LCFS amendments effective January 1, 2025. This is necessary to respond to LCFS credit market instability due to the "record amount of renewable energy generating significantly more credits than are required to offset deficits created by the currently outdated CI targets," and the need to "send clear and stable market signals," to name a few.²

OAL's comments on the rulemaking package, and CARB's 15-day changes, are relatively narrow in scope and mostly non-substantive. We encourage CARB to efficiently review public comments and promptly submit its revised rulemaking package to OAL as soon as possible. CARB should encourage OAL to complete its review and file the regulations with the Secretary of State to ensure an effective date before the end of the reporting period for the first quarter of 2025.³

¹ For more information about Dairy Cares, please visit www.dairycares.com.

² Final Statement of Reasonings for Rulemaking, Appendix A – Summary of Comments and Agency Response, Section S-1, pp. 540-551, [Link](#).

³ California Government Code Section 11343.4(a)(3).