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April 21, 2025

The Honorable Dr. Steve Cliff
Chair, California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: Third Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information: Proposed Low Carbon Fuel Standard Amendments

Dear Dr. Cliff:

The Transport Project (TTP) respectfully submits the following comments on the California Air Resources Board (CARB) Third Notice on the proposed amendments to the California Low Carbon Fuel Standard (LCFS) program and is in support of the objective: To continue to incentivize the lowest carbon fuels and technologies available to the transportation market. The LCFS amendments proposed by CARB staff represent significant efforts that are appreciated and which TTP continues to support. It is our belief that California should continue to be fuel neutral through the LCFS, using national standards and the Argonne GREET model to determine the best LCFS credit generators.

The Transport Project is a national coalition of fleets, vehicle and engine manufacturers and dealers, servicers and suppliers, and fuel producers and providers dedicated to the decarbonization of North America's transportation sector. By continuing to increase the use of gaseous motor fuels including renewable natural gas (RNG) and hydrogen, California can achieve ambitious climate goals and greatly improve air quality safely, reliably, and effectively without delay and without compromising existing commercial business operations.

In California, the use of low-carbon fuels including renewable diesel and renewable natural gas have produced most of the emissions reductions to date, demonstrating the need to retain these fuels while ZEV technology, charging/fueling and supply reach full operational capacity. There is **no one solution** to the pressing environmental issues facing the transportations sector. The LCFS with the proposed amendments will deploy those technologies and solutions that are readily available, maximize cost-effective emission reductions, and provide a real pathway to carbon neutral/negative emissions.

The Transport Project thanks CARB for its work and requests expedient approval of the Third 15-day Package before July 1, 2025, to allow the amendments to be in effect for the first quarter of 2025.

Please contact me with any questions.

Sincerely,

Sherrie Merrow
The Transport Project Director of State Government Affairs