April 21st, 2025

VIA ELECTRONIC FILING

Matthew Botill

Branch Chief, Industrial Strategies Division

California Air Resources Board

1001 I Street Sacramento, California 95814

**RE: Comments on April 4th, 2025, Proposed LCFS Amendments (Third 15-Day Package)**

Dear Mr. Botill:

Monarch Bioenergy LLC (Monarch) is pleased to provide comments on the Third Notice of Public Availability of Modified Text to the Proposed Low Carbon Fuel Standard (LCFS) Amendments.

Monarch works in rural farm communities, where we develop, build, own, and operate carbon-negative Renewable Natural Gas (RNG) projects in partnership with the nation’s farmers. Monarch has actively participated in the LCFS program for years and considers CARB a highly valued partner in our business. We are grateful for CARB’s ongoing effort to refine and advance this rulemaking as soon as practicable.

Although stakeholder input in the rulemaking process has enhanced the final product for all parties involved, the absence of clear guidance has affected the Monarch platform and the rural farming communities where we develop our projects. We have developed projects representing hundreds of millions of dollars in potential private capital deployment and await definitive guidance before making final investment decisions. These projects generate rural construction activity.

We recognize that energy is an important national conversation, with all participants raising valid concerns, representing differing yet valuable views and priorities. Monarch simply takes waste products from the existing agricultural process and turns these waste streams into usable energy, efficiently using existing natural gas infrastructure. Monarch’s biogas heats homes, powers farm equipment, generates electricity, and runs commercial facilities; our biogas can also assist in decarbonizing data centers.

We respectfully urge the Board to approve the amendments and resubmit the package to the Office of Administrative Law within the 120-day window. Monarch is proud to partner with California and the nation’s farmers to turn waste into useful, sustainable energy from their standard farming process. Thank you for supporting platforms like Monarch. We look forward to the finalized LCFS framework.

With best regards,

*s/Sean Lock*

Sean Lock

President and Chief Investment Officer

Monarch Bioenergy LLC