



1730 South St. | Redding, CA | 96001

Matthew Botill
California Air Resources Board
1001 I Street
Sacramento, California 95814

April 21, 2025

Re: Maas Energy Works Comments on Low Carbon Fuel Standard Third 15-Day Amendments

Dear Mr. Botill:

Maas Energy Works (MEW) respectfully submits these comments to the California Air Resources Board (CARB) in response to the April 4, 2025, *Third Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information* Proposed Low Carbon Fuel Standard (LCFS) Amendments – the Third 15-Day Package.

MEW is a family-owned business based in Redding, California. We develop, own, and operate on-farm renewable energy facilities. We work with dairy families to create biogas from cow manure and other organic waste. That biogas is then used to generate vehicle fuel - usually compressed natural gas, but we can also produce electricity and hydrogen. Our ~180 employees operate the nation's largest fleet of dairy digesters, with ~50 operational facilities right here in California and more than 20 additional projects in development. We are positioned to continue building if market conditions remain viable.

We support the proposed Third 15-Day Amendments and urge CARB and the Office of Administrative Law (OAL) to finalize and implement the rule without further delay. After several years of regulatory uncertainty and declining credit values, the LCFS market needs stability. Finalizing this rule will restore market confidence and ensure that project developers can continue investing in clean fuel infrastructure.

The new rules are not necessarily favorable to dairy biogas, as they include a reduction in the number of years that dairy biogas projects can remain eligible to claim avoided methane benefits, among other policies that we hope may be later changed. However, the overall state of the LCFS market requires clarity and stability, and so we urge rapid adoption of the new rules.

We thank CARB staff for their tireless work to strengthen the LCFS and we encourage immediate action to implement the updated rule.

Sincerely,

Dallas Spiecker – Public Affairs & Marketing Communications
Maas Energy Works