

April 21, 2025

Rajinder Sahota  
Deputy Executive Officer, Climate Change and Research  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Comments on the Proposed Third 15-Day Changes to the Low Carbon Fuel Standard (LCFS)  
Proposed Regulation Order**

Dear Ms. Sahota:

We appreciate the opportunity to comment on the Proposed Third 15-Day Changes to the Proposed Regulation Order. We strongly support California's LCFS, which is critical to supporting the transition to zero emission vehicles (ZEVs) in California. We support the proposed Third 15-Day Changes and clarifications, including those around hydrogen refueling infrastructure (HRI) crediting, and we urge CARB to quickly finalize this regulatory package, and the Office of Administrative Law to approve it, so that the amendments can take effect as soon as possible and investments can follow to support California's clean transportation goals.

**About Prologis, Inc.**

Headquartered in San Francisco, CA, Prologis, is the global leader in logistics real estate, with a portfolio of over 1.3 billion square feet across four continents and approximately 2.8% of global GDP flowing through our properties each year. Prologis leases modern warehousing and distribution facilities to customers, which include manufacturers, retailers, transportation companies, third-party logistics providers, and other enterprises. Our large, flat rooftops have enabled us to build out commercial solar installations to serve onsite and offsite load with clean energy and battery storage, helping our customers reduce their emissions and placing us second in the U.S. for corporate on-site solar.

Prologis' Mobility business is helping transform the fleet and logistics industry and enabling our customers to transition to zero-emissions through industry-leading electric vehicle (EV) charging technology and solutions. With roughly 180 million square feet of industrial real estate across our California portfolio, the opportunity for us to help our customers with this transition is significant, and we are developing dedicated charging infrastructure at Prologis sites to support their medium- and heavy-duty (MHD) fleets across last mile, drayage, and other applications. In addition to providing charging solutions at our own properties, we offer electrification services at non-Prologis buildings and are developing multi-fleet charging hubs serving areas with dense concentrations of warehouses.

**Expanding Access to Book-and-Claim Accounting for Biomethane-to-Electricity  
Pathways will Further Support California's ZEV Market**

We support finalizing the regulation and implementing the current set of amendments, along with the proposed 3<sup>rd</sup> 15-Day Changes, as soon as possible. Moving forward, we look forward to continuing to work with CARB to further strengthen the regulation and support the transition to ZEV fleets, including by

expanding book-and-claim eligibility to biomethane used in linear generators to charge EVs and green hydrogen-to-electricity pathways, per our previous comments.<sup>1</sup> To be clear, we are not requesting additional changes to the proposed program amendments in this rulemaking process.

Thank you for the opportunity to comment on the 3<sup>rd</sup> 15-Day Change package and your work to quickly finalize the rulemaking and implement the LCFS amendments. We look forward to continuing to work with CARB on these provisions and ongoing implementation of the regulation, and continuing to invest in deployment of resilient charging infrastructure to support ZEV truck fleets.

Respectfully submitted,

**Alexis Moch**

Vice President, Government Affairs  
Prologis

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<sup>1</sup> <https://www.arb.ca.gov/lists/com-attach/6-lcfs2024-2nd15day-UjFVPABgVWoLZFcj.pdf>