



Helping dairies fuel a renewable future

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April 21, 2025

Ms. Rajinder Sahota
Deputy Executive Officer - Climate Change & Research
California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: California Bioenergy's Comments on CARB's April 4th, 2025 Third 15-Day Amendments to the Low Carbon Fuel Standard Regulation

Dear Ms. Sahota,

Thank you for the opportunity to provide these comments to California Air Resources Board (CARB) relating to the Third 15-Day Amendments to the Low Carbon Fuel Standard (LCFS) Regulation released on April 4th, 2025. California Bioenergy LLC (CalBio) is appreciative of CARB's efforts over the past several years to develop the LCFS program into one of the most impactful policies to support the transition from fossil fuels to lower carbon alternatives.

Founded in 2006, CalBio works closely with California dairy farm families along with local, state, and federal agencies to reduce methane emissions. CalBio is committed to enhancing environmental sustainability for all Californians through our digester projects which produce carbon-negative renewable natural gas and electricity.

CalBio urges CARB and OAL to adopt the latest 15-Day Rulemaking Package as amended

We write these comments to commend CARB's continued leadership in advancing policies that address climate change, promote public health, and stimulate economic growth. The LCFS has been instrumental in facilitating the development of dairy digesters. According to data from the California Department of Food and Agriculture (CDFA), dairy digesters in California are on track to collectively reduce approximately 2.4 million metric tons of CO₂-equivalent (MTCO_{2e})¹ emissions annually—marking significant progress toward achieving the 40% methane reduction target set by SB 1383.

Also important to consider are the environmental, health, and economic benefits of the LCFS program. Since its inception, the program has achieved a reduction of approximately 13% in the carbon intensity of transportation fuels, displacing over 30 billion gallons of petroleum fuel and reducing emissions equivalent to removing 6.4 million cars from the road. This reduction in fossil fuels translates directly into public health benefits. CARB estimates that from 2024 to

¹ California Department of Food and Agriculture Dairy Digester Research and Development Program – Program-Level Data (Updated January 8, 2025) https://www.cdfa.ca.gov/oefi/DDRDP/docs/DDRDP_Program_Level_Data.pdf



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2046, the LCFS will result in \$5 billion in savings from avoided health outcomes, primarily through enhanced air quality.²

While we believe there are aspects of the regulation which could be improved – namely the concerns we had raised in previous around data substitution methodologies in Section 95491.2³⁴, we believe CARB and the Office of Administrative Law (OAL) should adopt the final draft regulation of the LCFS Program as written. Given the growing LCFS credit bank, **it is imperative that the effective date of the regulation be applicable to Q1 2025 dispensing fuel reporting activities such that the LCFS Carbon Intensity Benchmarks stated in Table 2 and Table 3 of the Proposed Regulation remain in full effect.**

At a time where ambitious climate action is needed now more than ever, the LCFS remains the primary example for other states and the world to follow. We appreciate CARB's dedication to environmental stewardship and stand ready to support the continued success of the LCFS.

Sincerely,

Andrew Craig
Vice President, Greenhouse Gas Programs
California Bioenergy LLC

² CARB updates the Low Carbon Fuel Standard to increase access to cleaner fuels and zero-emission transportation options <https://ww2.arb.ca.gov/news/carb-updates-low-carbon-fuel-standard-increase-access-cleaner-fuels-and-zero-emission>

³ CalBio Comments on CARB's Proposed Tier 1 Simplified Calculator for Biomethane from Anaerobic Digestion of Dairy and Swine Manure released December 19, 2023 <https://www.arb.ca.gov/lists/com-attach/6968-lcfs2024-VTYCZQFsV2ZRPgBv.pdf>

⁴ California Bioenergy's Comments on CARB's April 10th, 2024 Public Hearing on the Low Carbon Fuel Standard <https://ww2.arb.ca.gov/form/public-comments/submissions/11571>