

November 10, 2025



Lauren Sanchez, CARB Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: American Biogas Council Comments on the Proposed Amendment to the Low Carbon Fuel Standard

Dear Chair Sanchez,

The American Biogas Council (ABC) appreciates the opportunity to comment on the recently proposed targeted amendment to the Low Carbon Fuel Standard (LCFS). The ABC is the voice of the U.S. biogas industry dedicated to maximizing carbon reduction and economic growth using biogas systems. We represent more than 400 companies leading the way to a better future by maximizing all the positive environmental and economic impacts biogas systems offer when they are used to recycle organic material into renewable energy and soil products. All of this is an effort to protect our air, water, and soil – crucial parts of the solution our members provide to help California meet its environmental and climate goals. The technology-neutral and scientifically-based design of the LCFS recognizes the benefits of projects that collect biomethane that would otherwise be emitted to the atmosphere making it available for use in transportation.

The proposed amendment aims to create a new eligible use (i.e., linear generators) for book-and-claim accounting for biomethane used to produce electricity for electric vehicles in section 95488.8(i)(2) and allow the use of this method through December 31, 2035. Previously, this section was limited to fuel cells, which ABC expressed support for in our October 16, 2024, comments regarding the second set of 15-Day changes to the LCFS. The ABC also supports this targeted modification to the program as it increase the application of biomethane beyond its traditional uses in other technologies, thus increasing opportunities for the use of clean low-carbon biomethane in the transportation space. Recognizing the importance that biomethane has in advancing non-combustion technologies, such as fuel cells and linear generators, is a critical part of the energy transition and will help California meet its climate goals. Further, we encourage CARB staff to continue to expand use cases for biomethane book-and-claim throughout the program, which can accelerate the reduction of the carbon intensity of transportation fuels.

We would like to thank staff for their continued hard work on implementing this program, and we look forward to further engagement.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Serfass".

Patrick Serfass, Executive Director

**About the American Biogas Council** The American Biogas Council is the voice of the US biogas industry dedicated to maximizing carbon reduction and economic growth using biogas systems. We represent more than 400 companies in all parts of the biogas supply chain who are leading the way to a better future by maximizing all the positive environmental and economic impacts biogas systems offer when they recycle organic material into renewable energy and soil products. Learn more online at [www.AmericanBiogasCouncil.org](http://www.AmericanBiogasCouncil.org), Twitter [@ambiogascouncil](https://twitter.com/ambiogascouncil), and [LinkedIn](https://www.linkedin.com/company/ambiogascouncil).