



September 15, 2025

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted Electronically Via: <https://ww2.arb.ca.gov>

To whom it may concern:

Agricultural Council of California (Ag Council) represents approximately 15,000 farmers across California ranging from small, farmer-owned businesses to some of the world's most recognized food brands. Our membership includes many farmer-owned cooperatives and businesses that rely on trucking and transportation to bring food and other agricultural products to market. As such, our members are directly impacted by the state's transportation and fuels policies, including amendments to the Low Carbon Fuel Standard (LCFS).

We are thankful for the opportunity to provide input on the proposed amendments and to share our perspective on both the repeal of the Advanced Clean Fleets (ACF) regulation and the proposed changes to Hydrogen Refueling Infrastructure (HRI) credits.

Revocation of the ACF Regulation:

We acknowledge and appreciate CARB's decision to revoke the ACF regulation. This action provides California farmers, ranchers, and food businesses much-needed flexibility to address their trucking needs while the market continues to advance toward zero-emission technologies. Removing regulatory uncertainty allows producers and processors to make operational decisions that ensure goods can move efficiently, while still positioning the state to achieve its ambitious climate goals as technologies mature.

Hydrogen Refueling Infrastructure Credits:

Ag Council appreciates CARB's efforts to increase support for hydrogen refueling stations through enhanced crediting. Expanding crediting opportunities has the potential to accelerate the availability of hydrogen fuel infrastructure across the state. However, we are cautious about how these changes may affect fuel markets.

California's agricultural fleets remain overwhelmingly composed of internal combustion engine (ICE) vehicles, and any increase in fuel costs directly impacts the competitiveness of farmers and food processors. As HRI crediting expands, we are concerned that costs could be shifted in ways that inadvertently raise prices for fleets that do not yet have the option of transitioning to hydrogen or other zero-emission technologies.

To ensure balance, we respectfully recommend that CARB:

- Provide an economic impact analysis evaluating how HRI crediting changes may affect retail fuel prices, particularly for diesel; and
- Provide transparency in LCFS program data to allow stakeholders to monitor how changes in crediting influence both infrastructure investment and fuel price trends.

Ag Council is committed to advancing workable climate solutions that align with California's environmental goals while ensuring the economic viability of our state's farmers food producers. We appreciate CARB's continued engagement with stakeholders on this issue.

Thank you for your consideration of these comments. Please do not hesitate to contact me at (916) 952-9151 or emily@agcouncil.org with any questions.

Sincerely,

A handwritten signature in black ink that reads "Emily Rooney". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Emily Rooney
President

