



November 13, 2014

Wes Ingram
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on Sustainable Oils' pending Method 2B Fuel Pathway Application for Camelina sativa-based biofuels

Dear Mr. Ingram,

The Natural Resources Defense Council, Union of Concerned Scientists, and the National Wildlife Federation appreciate the opportunity to provide supportive comments about the pending Method 2B Application for Camelina sativa-based biodiesel and renewable diesel, filed by Sustainable Oils and its parent company, Global Clean Energy Holdings.

In general, our organizations support the replacement of crude oil by lower carbon-intensity, sustainably sourced feedstocks produced in a manner that avoids land displacement or adverse effects on food, forage and fiber crops. As part of this, we also support the utilization of sustainability certification, such as the Roundtable on Sustainable Biomaterials (RSB) or equivalent, to measure and verify environmental and social sustainability performance. Our understanding is that Global Clean Energy Holdings will be pursuing RSB certification. Based on the application submitted by Sustainable Oils, together with the issuance of a RSB certificate, which in our view is a critical component to the approval of the Method 2B applications which claim credits for improvements in agricultural practices, we support the timely approval of their pathways. Our specific comments are below:

Land use: As described by the applicants, roughly 40,000 acres of their Camelina variety is currently grown on primarily fallow or underutilized land. Because of this, it appears reasonable at this stage to assume a zero indirect land use change value for their pathway. However, we note that this assumption is valid so long as the approach continues to be on marginal or fallow lands that do not displace other crops.

Shifts to other types of lands would change these impacts. For these reasons, we also strongly support ARB's annual reporting requirements on the amount and type of land that is utilized to produce the product compliant pathway, and agree that other producers wishing to utilize this type of pathway will also need to demonstrate the same "Applicable Operating Conditions."

As a reference point, one study by Shonnard et al. (2010) found that "Altogether more than 5 million U.S. acres have the potential to grow Camelina in a sustainable manner with no impact on food supply."¹

On-going monitoring of critical parameters: ARB should continue to update its data on production practices and lands utilized by Camelina producers as well as for other feedstocks, on an on-going basis. We also recognize that, as a relatively new biofuel feedstock being commercialized, the potential yield levels may change over time. For these reasons, we support ARB's plan to

"Continue to follow the development of Camelina and its penetration into the agricultural commodity market and its potential to displace any other crop in the market. If it appears that an increase in Camelina production has the potential to cause indirect land use changes, staff will consider revising the zero ILUC emission factor. The annual reports shall include the number of acres on which Camelina of Sustainable Oils' seed varieties is being grown, the amount of Camelina of Sustainable Oils' seed varieties that is produced on this land, and the type and the amount of the primary crop produced on this land."

Sustainability Certification: We believe ARB's work to consider third-party certification systems, like the RSB, can augment ARB's on-going monitoring and data collection for new and existing pathways.

Livestock Feed: The applicant mentions the potential for livestock feed to be produced as a by-production or co-product of Camelina biofuels production, but no calculation was included. We are assuming that there is not a livestock feed currently produced but want to ensure

¹ Shonnard, D., L. Williams and T. Kalnes. "Camelina-Derived Jet Fuel and Diesel: Sustainable Advanced Biofuels." *Environmental Progress & Sustainable Energy* 29.3 (2010): 382-392. Accessed online 6 Feb. 2012 at <http://onlinelibrary.wiley.com/doi/10.1002/ep.10461/pdf>.

consistency between pathways. Under other feedstock pathways, ARB's approach has typically been to assign a co-production credit.

In summary, we are pleased to see Global Clean Energy Holdings pursue an approach that is supportive of the intent and goals of the LCFS and support timely approval of their pathways.

Sincerely,

A handwritten signature in black ink on a light blue background. The signature reads "Barbara Bramble" in a cursive script.

Barbara Bramble
Senior Program Advisor, International Affairs
National Wildlife Federation

A handwritten signature in black ink. The signature is highly stylized and appears to read "Jeremy I. Martin".

Jeremy I. Martin
Senior Scientist, Clean Vehicles Program
Union of Concerned Scientists

A handwritten signature in black ink. The signature reads "Debbie Hammel" in a cursive script.

Debbie Hammel
Senior Resource Specialist
Natural Resources Defense Council

cc:

Mike Waugh, Chief
Alternative Fuels Branch