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*Innovating renewables for the future* www.imperiumrenewables.com

Michael S. Waugh,  
Chief, Transportation Fuels Branch  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812  
United States

April 11, 2014

Dear Sir:

**Re: Low Carbon Fuel Standard Update – Proposed Carbon Intensity Numbers for Canola**

The California Low Carbon Fuel Standard (LCFS) biodiesel market is an important market for our company. Imperium Renewables Inc. (IRI) appreciates the opportunity to provide comments on the reauthorization of the LCFS and the estimation of an indirect land use change emission value for canola biodiesel.

IRI owns and operates Imperium Grays Harbor (IGH), the largest biodiesel production facility on the West Coast. IGH is located in Hoquiam, Washington, and is currently serving North American markets. IGH production capacity is 100,000,000 gallons per year. IGH has produced canola biodiesel for the California market since 2013 and is currently serving the market with product delivered throughout the state.

The LCFS offers a clear market incentive towards reducing the carbon intensity of transportation fuels and is encouraging the necessary investments in fuel production facilities to accomplish the reduction of GHG emissions. The LCFS does this while also maintaining competitive low carbon energy prices, promoting economic development as part of the transition to a cleaner energy system, and meeting California's policies under AB 32 calling for the reduction of greenhouse gas emissions.

We offer an immediate low carbon fuel solution with our canola biodiesel to the California transportation sector, a fuel solution that can be integrated into the diesel fuel pool seamlessly and start reducing California's emissions immediately. This can help quickly and easily meet the goals of AB 32. Major North American petroleum companies who are complying with the existing LCFS in California are currently purchasing our canola biodiesel. If there is a lack of clarity or backsliding in policy specific to North American canola's Indirect Land Use values, IGH will need to reassess our operations and significantly reduce product flow into California.

Lastly, we support the Canadian Canola Council's (CCC) assessment and need for further analysis and review regarding North American canola's ILUC. I have reviewed the CCC's comments and would appreciate the opportunity to participate in further discussion. I look forward to collaborating with CARB and the CCC on this issue.

Yours sincerely,

Todd Ellis

A handwritten signature in black ink that reads "Todd Ellis". The signature is written in a cursive style with a horizontal line above the first letter "T".

Vice-President Sales and Business Development  
Imperium Renewables Inc.