DuPont Industrial Biosciences

June 16, 2016

Ms. Ursula Lai
California Air Resources Board
LCFSWorkshop@arb.ca.gov

E. I. du Pont de Nemours and Company submits these comments in response to CARB's Proposed LCFS Verification Program as detailed in CARB's presentation dated June 2, 2016 and CARB's Preliminary Draft of Proposed Regulatory Amendments dated May 27, 2016.

DuPont is in the final stages of starting up a facility for the production of Cellulosic Ethanol located in Nevada, Iowa. We will be submitting a Tier 2 Method 2B application for approval of one or more pathways that describe the production of Cellulosic Ethanol in our facility.

We refer to Section 38560 of the California Low Carbon Fuel Standard (AB32) which reads as follow:

> The state board shall adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective greenhouse gas emission reduction from sources or categories of sources, subject to the criteria and schedules set forth in this part.

We believe that CARB's proposal to adopt regulations that would involve third party verification of applications for pathways and the operation of facilities is consistent with the intent of the AB32. As a result, DuPont expresses general support for CARB's proposed regulatory amendments.

While we expect to submit more detailed comments after CARB issues a new draft regulation and after the next workshop currently scheduled for July 14, we have suggestions regarding third party verification of all steps in the production and use of ethanol. In order to achieve the objective of AB32, i.e. the maximum technologically feasible reduction in greenhouse gas emissions, DuPont believes the regulations should be flexible in taking into account a wide variety of operations and supply chains for feedstock, fuel and co-products. As an example, a process that produces a co-product that is used to replace a commodity with a higher greenhouse gas footprint should receive a lower CI value than a process that produces a co-product that replaces a commodity with a lower greenhouse gas footprint.

Third party periodic verification of all actual contributing greenhouse gas factors for ethanol would reduce the burden on CARB of monitoring off-site aspects of the supply chain while enabling CARB to recognize and assign CI values to a wider range of pathways based on actual greenhouse gas reductions. This would help achieve the objectives of AB32 by maximizing reductions in greenhouse gasses.

Respectfully submitted,

Steven W. Ogle

Cellulosic Ethanol Commercial Leader