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June 23, 2017

California Environmental Protection Agency (CalEPA)
Attention: Anil Prabhu
1001 I Street
P.O. Box 2815
Sacramento, CA 95812-2815

Dear Mr. Prabhu,

The Biorenewable Deployment Consortium (BDC) is a 501(c)(3) organization formed in 2006 to help accelerate the deployment of economic bioprocesses in order to improve the national security of the nation and to assist the forest products industry in taking a lead in the bio-industry. BDC has grown into an international organization that works to educate and to help broker partnerships for its members, who include bio-process companies and potential host partners in the forest products industry.

BDC has a very positive view and strongly supports the methodologies to determine co-processing yields as proposed by the California Air Resources Board in the draft report "Co-processing of Low Carbon Feedstocks in Petroleum Refineries Draft Discussion Paper" dated May 30, 2017. The mass balance approach is the accepted standard within the refining industry for determining commercial performance, and it can be accomplished with existing refinery equipment and analytical methods.

By choosing this methodology and promoting the co-processing of biocrude oils within the petroleum refinery plants, we believe that a door is opened for an increase in the commercial production of transportation fuels from cellulosic biomass. BDC and our members are excited to see the progress in this direction.

Sincerely,

A handwritten signature in blue ink, appearing to read "Masood Akhtar".

Masood Akhtar
President and Co-founder
cc: Sam Wade