



Red Rock Biofuels
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November 4, 2020

Rajinder Sahota
Division Chief, Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Ms. Sahota:

I am writing to you to express support for the Novel Technology Investment Credit (NTIC) program that was presented by Virent and Marathon in the LCFS Public Workshop on Oct. 15, 2020 and Red Rock Biofuel's encouragement that CARB move the NTIC program into the next rule making process for incorporation into the LCFS.

Red Rock Biofuels (RRB) was founded in 2011 to tackle the need to decarbonize transportation and the growing problem of catastrophic wildfires. We convert waste woody biomass, a second-generation feedstock, from timber harvesting and forest restoration activities to low-carbon, cellulosic renewable jet (SAF) and diesel fuels in a first-of-a-kind proprietary integration of gasification, Fischer-Tropsch, and hydroprocessing technologies. RRB's first commercial plant in Lakeview, Oregon is slated to start up in spring 2021 and will supply 16 MGY of SAF and renewable diesel fuels to California. After successful deployment of our Lakeview plant, RRB is targeting California for deployment of our next commercial plant.

RRB supports the NTIC program because we believe it is the correct approach to advance the growing need for low-carbon fuels in California. It will help companies like ours to commercialize and deploy low carbon fuels technologies at a commercial scale. We believe the program is correctly structured to limit the risk to the LCFS program in that investors would take the upfront risks to demonstrate the new technology is commercially and operationally viable. Additionally, administrative controls to limit the number of credits awarded to 5-7% of deficits would help to ensure existing investments are not placed at a disadvantage and can be implemented under the existing CARB administrative infrastructure with no cash outlays by the State of California. We believe that the NTIC program will bring significant additional investments into new low carbon fuels technologies, resulting in significant increases in production of low carbon fuels.

RRB could utilize the NTIC program to deploy our second commercial-scale biorefinery, which would be twice the production scale of our first biorefinery in Lakeview and produce approximately 32-MGY of low-carbon SAF and renewable diesel to meet California's growing need for low-carbon transportation fuels. Financing is the largest impediment to deploying commercial-scale biorefineries with novel process technologies. The NTIC program would enable RRB to reduce financial risk and attract strong financing partners. Additionally, RRB's usage of waste woody biomass as the feedstock would help mitigate the growing problem of catastrophic wildfires, reduce air pollution, and improve forest health in California. RRB would also create well-paying jobs at its plant as well as in the forestry sector.

For all these reasons, Red Rock Biofuels encourages you to move the NTIC program forward in the CARB rule-making process.

Best Regards,

A handwritten signature in blue ink, appearing to be "JM", is written over a blue rectangular stamp.

Jeff Manternach
CFO
Red Rock Biofuels