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December 21, 2022

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear California Air Resources Board:

The National Oilseed Processors Association (NOPA) respectfully submits these comments in response to the California Air Resources Board's (CARB) request for comments at its November 9, 2022, Workshop on the Low Carbon Fuel Standard (LCFS), titled "*Concepts and Tools for Compliance Target Modeling.*"

Organized in 1930, NOPA, represents the U.S. soybean, canola, flaxseed, safflower seed, and sunflower seed-crushing industries. NOPA's membership includes 13 members that are engaged in the processing of oilseeds for meal and oil that are utilized in the manufacture of food, feed, renewable fuels, and industrial products. NOPA member companies operate a total of five softseed and 61 solvent extraction plants across 22 states.

NOPA members' oilseed processing operations yield protein-rich meal for human and animal nutrition, as well as vegetable oil that is used as an ingredient in food manufacturing and as a feedstock for renewable fuels and in a wide array of industrial applications. NOPA members crush 94% of all soybeans processed in the U.S., which amounts to over 2 billion bushels of soybeans annually.

NOPA members are proud to produce feedstock that is used in biodiesel and renewable diesel. These sustainably produced biofuels help reduce carbon dioxide equivalent (CO<sub>2</sub>e) greenhouse gas emissions and the carbon intensity of transportation fuels in use today. Production of these biofuels is incentivized by the demand created by the Low Carbon Fuel Standard (LCFS) and federal standards, including the Inflation Reduction Act's incentives for sustainable aviation fuel.

NOPA members and its value-chain partners are making significant investments to produce the vegetable oil to meet demands of biofuel, feed, and food customers. According to trade estimates the U.S. is on track to increase soybean crush capacity by over 25%-30% between 2022-2026. Approximately 20 plant expansions or new facilities have been announced. NOPA members are investing billions of dollars in new processing capacity to meet the demand for these low-carbon feedstocks

Importantly, this increased soybean crush capacity is in response to growing domestic and global demand for oilseed products, but it is largely supplied by improving the yields from existing acreage

already farmed with oilseed crops, increasing the amount of oil produced by such crops and regenerative farming practices, such as cover crops, which reduce the carbon intensity of agricultural practices.

The LCFS has been instrumental in catalyzing the investment in fuels-production infrastructure needed to meet the growing demand for low-carbon fuels. Imposing an arbitrary cap on lipid-based fuels at this critical inflection point would stand as an obstacle to the transition in transportation fuels-production that is necessary to reduce the carbon intensity of fuels that will be needed for heavy-duty applications, including aviation for many years to come

NOPA greatly appreciates this opportunity to comment on CARB's recent Workshop.

Respectfully,

A handwritten signature in black ink that reads "Thomas A. Hammer". The signature is written in a cursive style with a long, sweeping underline.

Thomas A. Hammer  
President