



November 5, 2020

Acting Chief  
Transportation Fuels Branch  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: CABA Comments on Potential LCFS Regulation Revisions**

Dear Transportation Fuels Branch:

Thank you for the opportunity to comment on the potential Low Carbon Fuel Standard (LCFS) regulation revisions, released by staff of the California Air Resources Board (CARB) on October 14-15, 2020. The California Advanced Biofuels Alliance (CABA) is a not-for-profit trade association promoting the increased use and production of advanced biofuels in California. CABA has represented biomass-based diesel (BMBD) feedstock suppliers, producers, distributors, retailers, and fleets on state and federal legislative and regulatory issues since 2006. We have been a long-time supporter of the LCFS and applaud CARB for addressing the need to update certain aspects and tools of the program.

Biomass-based diesel fuels have provided cumulatively 41% of all LCFS credits generated since 2011 and have therefore been a key contributor to the LCFS' success. Biomass-based diesel fuels have displaced so much petroleum diesel in eight years that biodiesel and renewable diesel now comprise nearly 22% of each gallon of diesel fuel used in California. These high-performing diesel replacements have transitioned from modest credit generators to mainstays of the program, accounting for 45% of LCFS credits in 2018 and 2019.<sup>1</sup>

We support the LCFS and appreciate CARB's commitment to using the most up-to-date science in the program; accordingly, we suggest updating certain datasets and calculations to reflect recent scientific advancements and field data relevant to biomass-based diesel. As further discussed in the National Biodiesel Board's (NBB) comments, we too support the request for CARB staff to update the datasets underpinning the GTAP-BIO and AEZ-EF models, as well as make other updates to direct carbon intensity (CI) calculations for biomass-based diesel. As shown in NBB's comments, these requests were peer-reviewed and published as part of Argonne National Lab's 2018 review of several biodiesel pathways.<sup>2</sup>

Along with these modifications, CABA urges CARB to approve retroactive credit generation using certified provisional and final CI pathways. In order to incentivize credit-generating opportunities from new or newly expanded facilities, CABA urges CARB to allow fuel producers with new facilities or

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<sup>1</sup> [LCFS Quarterly Data Summary \(updated April 30, 2020\)](#)

<sup>2</sup> Chen, R., Qin, Z., Han, J., Wang, M., Taheripour, F., Tyner, W., . . . Duffield, J. (2018). Life cycle energy and greenhouse gas emission effects of biodiesel in the United States with induced land use change impacts. *Bioresource Technology*, 251, 249-258



expansions to request a true-up of credits using certified CI pathways instead of using temporary CI pathways. This would allow producers with new or newly expanded facilities to generate credits based on actual operational CI scores as opposed to being penalized by only getting to use temporary CI scores.

CABA promotes the increased use of advanced biofuels in the state and like CARB, our goal is to displace petroleum with low carbon alternatives. The modifications proposed by NBB and the allowance of retroactive credit generation from newly built or expanded facilities will only add to the success of the LCFS. The biomass-based diesel industry is a vital part to California's low-carbon future, and we look forward to continuing our cooperative and productive relationship with CARB.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tyson Keever".

Tyson Keever  
Chair  
California Advanced Biofuels Alliance