

January 7, 2022

To Mr. Richard Corey
Executive Officer
California Air Resources Board
1001 I St Sacramento, CA 95814

Reference: Considerations for LCFS Updates

Dear Mr. Corey,

Please consider the following comments for improvements to the LCFS.

- Streamline the book and claim process for renewable natural gas to multiple fuel pathways. Hydrogen is a fuel for vehicles but is also used in the production of renewable diesel, methanol (used in biodiesel production), Fischer Tropsch diesel, and other advanced biofuels. Book and claim features enjoyed by CNG and LNG should be applied to all fuels.
- Book and claim of RNG and renewable power as well as pipeline injection of hydrogen should be allowed for fuel producers in California.
- Forest residues, biomass, and other woody materials are a source of emission risk from wildfire risk and other incidental burning. Complete the analysis started in 2009 for the use of forest residue and farmed trees as feedstocks and process fuels. Wood biomass and crop residues should be treated as carbon neutral feedstocks. Farmed trees should receive an ILUC analysis based on the opportunity cost of the farmed land to grow other crops.
- Allow fuel producers to benefit from some of their excess emission reductions that would otherwise go to the credit bank.
- Provide a mechanism to support regenerative agriculture including green ammonia, nitrogen inhibitors, precision farming, improved tillage, and mechanisms for GHG reductions that are verifiable. Certification of farm level emissions is possible with the full rigor of LCFS verification that applies to fuel producers.
- Allow for avoided methane emissions from the removal of rice straw as a biofuel feedstock and process energy input.

Best Regards,



Stefan Unnasch
Managing Director
Life Cycle Associates, LLC