Good morning to everyone at CARB.

My name is Jennifer Case. I have owned and operated a biodiesel plant here in disadvantaged community of Barrio Logan in San Diego for the last 14 years. I’m absolutely shocked and very disappointed to have to be here today to oppose these ADF amendments in the midst of a pandemic that has forced our company in to the worst economic situation since our founding.

New Leaf was founded a woman-owned company, started by my friends and I in order to do reduce the use of fossil fuels in our beautiful state by producing biodiesel from used cooking oil. Our fuel has enjoyed one of the lowest Cis in the program. Despite our best efforts to contribute to California’s goals of reducing Greenhouse Gas Emissions, it seems that every time we turn around, we are fighting another uphill battle for our survival.

Right now, we are in severe economic distress. Our feedstock from the restaurants has dried up and the price of fuel is at historic lows. I have spent every day of the last month staring at my financials trying to figure out how to keep my employees working despite this unprecedented time. Despite being one of the smaller players in the biodiesel space, our employees enjoy high wages, employer contributed 401ks, free health insurance to employees and a bunch of other benefits that make us a great place to work. But right now, all of that is being threatened. First by the pandemic, and now by this hastily scheduled meeting today that threatens to put a final nail in the coffin of small biodiesel producers.

If the regulation as proposed is passed, our business will be finished. I’m not being dramatic here. Let me explain:

We do not have the buying power to buy Renewable Diesel and blend it at a high ratio with every gallon of biodiesel we produce. There are only a handful of RD suppliers, none of which are in California. The largest RD supplier in the world in Singapore, expressly forbids biodiesel to be blended with its RD.

So we are left with only a couple other RD producers that wont even take my phone call. If you insist on making sure that there is a certain amount of RD blended in to the fuel supply, GREAT. We support that. But it must be on an aggregate level. It cannot be in each physical gallon. And as others have stated here, the ratio in this proposed regulation is incorrect.

Even if we were able to obtain RD to blend in to our fuel, logistically, it would be impossible at every location where biodiesel is currently being used. There simply is not enough RD available, and the state lacks the infrastructure at this point for it to be widely distributed.

Furthermore, the 2 lab test is overly burdensome to our industry and imposes far harsher restrictions on testing than the fuel we are mitigating.

We absolutely need more time to work on this. Please don’t impose this regulation on us right now. Let us save our businesses and get through the pandemic and work with you on a regulation that we can actually survive. We all want the same thing here, and I’m sure your heart is in the right place. But the math, science and sales impacts are subject matters that require input and collaboration from all stakeholders. Without our input, you are going to kill us, and in turn, kill the LCFS program.