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April 26, 2018

By Electronic Mail

Clerk of the Board
California Air Resources Board
1001 I Street, 23rd Floor
Sacramento, CA 95812

Re: Proposed Amendments to the California Low-Carbon Fuel Standards Regulation and the Regulation on the Commercialization of Alternative Diesel Fuels

Dear Madam:


POET is pleased to submit the following comments with respect to proposed changes to the California Low Carbon Fuel Standard ("LCFS") program to be considered at a hearing of the California Air Resources Board ("CARB") on April 27, 2018. POET is the nation's largest producer of renewable biofuels. Our mission is to be good stewards of the Earth by converting renewable resources to energy and other valuable goods as effectively as humanly possible. POET's 28 bioprocessing facilities produce more than 1.8 billion gallons of cleaner-burning biofuel, helping reduce carbon emissions and improve air quality across the nation and world, including California. POET's mission has culminated in our establishment of the largest cellulosic ethanol plant on the planet, POET-DSM's Project Liberty plant in Emmetsburg, Iowa. Like the California Air Resources Board, we are deeply committed to the decarbonization of the energy sector through the implementation of renewables.

POET lauds the Air Resources Board for its overall goal of combatting climate change, and for certain important changes that CARB is proposing to the Low Carbon Fuel Standard. Specifically, POET is glad to see that CARB is updating aspects of its scientific assessment of corn starch ethanol carbon intensity values ("CIs"), and that the updates move corn starch ethanol CIs closer to the value that POET believes is best supported by the most current scientific data.

However, we believe that important work remains to ensure that the LCFS provides optimal market signals to the lowest CI fuels. To that end, we call CARB's attention to Part II of the Growth Energy comment letter, which we adopt in full by reference. Part II identifies important corrections to elements of CI calculations that, if incorporated, will better align the LCFS with its goal of providing proper incentives to low carbon fuels based on sound science.

We may make additional comments as appropriate as CARB continues its consideration of the LCFS revisions.

Thank you for the opportunity to comment, and your hard work in seeking to promote a lower carbon fuel supply.

Sincerely,

Jeffrey Lauth
President & COO