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GrowthEnergy.org

December 21, 2022

Dr. Cheryl Laskowski
Branch Chief, Transportation Fuels
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
Via electronic mail

RE: Comments in Response to the November 9, 2022, Low Carbon Fuel Standard Workshop

Dear Dr. Laskowski:

Thank you for the opportunity to further comment on the latest Low Carbon Fuel Standard (LCFS) workshop held on November 9th. Growth Energy is the world's largest association of biofuel producers, representing 90 U.S. plants that each year produce more than 8 billion gallons of renewable fuel; 108 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Together, we are working to bring better and more affordable choices at the fuel pump to consumers, improve air quality, and protect the environment for future generations. We remain committed to helping our country diversify our energy portfolio in order to grow more clean energy jobs, decarbonize our nation's energy mix, sustain family farms, and drive down the cost of transportation fuels for consumers.

As you know, Growth Energy has previously submitted extensive comments demonstrating the vital role low-carbon bioethanol and higher bioethanol blends can play in meeting California's ambitious climate goals. As we have noted previously, biofuels have been the largest contributor to the success of the LCFS program to date and are poised to continue to do so with appropriate updates to the program.

While we're happy to continue to comment, it is difficult for our industry to respond to the establishment of more aggressive carbon intensity reduction targets without more clarity on improvements in CARB's assessment and modeling of lifecycle emissions of bioethanol, the allowance of the use of higher biofuel blends like E15, and inclusion of low-carbon farm practices in the calculation of biofuels' carbon intensity.

Specifically in response to the discussion at the workshop, we strongly support and encourage the Board to update emission factors and lifecycle modeling to reflect the latest science, data, and information to appropriately capture the latest innovation in the biofuels industry. Additionally, as was further discussed, the Board should recognize the benefits of low-carbon

farm practices and how they can be driven by policies like the LCFS. The Board should also accelerate the multi-media working group process to approve E15 for use in California. E15 can be used by more than 96 percent of the current vehicle fleet, and if used statewide, could provide California with annual greenhouse gas emission reductions of 1.8M tons, the equivalent of taking more than 400,000 cars off of California roads each year.¹ The use of E15 should be a readily available compliance option under the LCFS. Finally, we continue to believe CARB's concerns about the use of crop-based biofuels and their impact on land use are misplaced and unfounded. These fears have been largely based on outdated and flawed data. We have particular concern about CARB's inclusion of corn oil in its evaluation of a possible cap on credits for diesel fuels from various virgin oil feedstocks. Corn oil is an important coproduct of the bioethanol production process that is then used to make other low carbon intensity, renewable fuels used for LCFS compliance. It makes little sense why it would be potentially capped for use disrupting the fuel supply chain.

We are providing our earlier comments with more specific data on these points.

More broadly, we look forward to working with the Board as you work through the regulatory process on revisions to the LCFS program and ensure the role of biofuels in making California's fuel mix more sustainable and help the state achieve its progressive climate goals through the expanded use of bioethanol.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Bliley".

Chris Bliley
Senior Vice President of Regulatory Affairs
Growth Energy

¹ Air Improvement Resources, "GHG Benefits of E15 Ethanol"; Nov. 30, 2020: [National E15 Analysis Final \(airimprovement.com\)](https://airimprovement.com)