October 16, 2024

Rajinder Sahota

Deputy Executive Officer for Climate Change & Research

California Air Resources Board

1001 I Street

Sacramento, CA 95814

**RE: National Corn Growers Association (NCGA) Comments on the Second 15-Day Proposed Amendments to the Low Carbon Fuel Standard Workshop**

Dear Ms. Sahota and CARB Staff,

The National Corn Growers Association (NCGA) appreciates the opportunity to provide comments on the Second 15-Day Proposed Amendments to the Low Carbon Fuel Standard (LCFS). We thank CARB staff for their work throughout this rulemaking process and considering stakeholder feedback. We hope to see the finalization of this rulemaking at the November 8 Board meeting so that the proposed amendments can take effect immediately and ensure the program can capture the maximum emission reductions.

NCGA represents 40,000 dues-paying corn growers and more than 300,000 farmers who contribute to corn promotion programs nationally. Along with its 50 affiliated state associations and checkoff organizations, NCGA works to protect and advance the interests of corn growers.

NCGA would like to share the following comments and concerns for consideration in response to the Second 15-Day Proposed Amendments shared on October 1:

**§95488.9(g): Sustainability Requirements**

NCGA would like to reiterate our previous comment letter submitted on May 10, 2024. We are concerned that the proposed sustainability requirements will impose a heavy regulatory burden for credit generators, which will likely result in increased responsibility and costs on farmers. Instead, we urge CARB to consider alternatives, including on-farm crediting to reward improved agricultural practices. Incentivizing improved farm-level practices can be a more effective measure to encourage adoption of more efficient practices and technologies, leading to overall carbon intensity (CI) reductions for a fuel pathway.

Farm-level crediting will also support the momentum of ongoing developments and innovations in farming practices. Notably, average corn yields have had steady increases since 2007, with farmers able to grow more corn on less land using fewer resources.[[1]](#footnote-2) Increasing yields are attributed to advancements in genetics and plant breeding, agronomic farm management, and soil fertility improvements (additional details are outlined in our May 10 comment letter). As proposed, sustainability requirements will have minimal impacts in supporting the central goal of the LCFS, reducing the CI of the transportation sector. Instead, it will add more administrative requirements that do not necessarily improve sustainability. It is evident that farmers are committed to adopting and integrating more efficient practices and technologies. Therefore, NCGA is supportive of a proposal to incentivize these initiatives instead of overly burdensome reporting requirements which will not result in CI reductions.

NCGA thanks CARB staff for their work throughout this extensive rulemaking process and ongoing consideration of stakeholder feedback. We are hopeful that this rulemaking will be finalized imminently, and the proposed amendments can be implemented.

Sincerely,

A black and white text

Description automatically generated

Kenneth R. Hartman, Jr.

President

National Corn Growers Association

1. [Rising U.S. Corn Yields Boost Production Without Additional Land](https://ncga.com/stay-informed/media/the-corn-economy/article/2023/09/rising-u-s-corn-yields-boost-production-without-additional-land) [↑](#footnote-ref-2)