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GrowthEnergy.org

May 31, 2023

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

RE: California Low Carbon Fuel Standard Tier 1 Calculators

Dear Dr. Laskowski:

Thank you for the opportunity to comment on the Air Resources Board's (CARB) latest draft Tier 1 simplified calculators for the Low Carbon Fuel Standard (LCFS). Growth Energy represents 92 plants who produce 9 billion gallons of renewable fuel; 112 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 green energy jobs, decarbonize our nation's energy mix, sustain family farms, and drive down the costs of transportation fuels for consumers.

Growth Energy has previously submitted extensive comments demonstrating the vital role low-carbon biofuels and higher biofuel blends can play in meeting California's ambitious climate goals, and we will plan to do so again in response to the latest workshop on the Auto-Acceleration for the LCFS in the next week or so. As we have noted previously and reiterate here, biofuels have been among the largest contributors to the success of the LCFS program to date and are poised to continue to do so with appropriate updates to the program. Specifically, 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, the state should move quickly to approve the use of E15, and the Board should recognize the benefits of low-carbon farm practices and how they can be driven by policies like the LCFS.

In regard to the Tier 1 calculators, we continue to reiterate using the most up to date science from Argonne National Laboratory's GREET Model 2022 including the most up to date inputs. Related, we would continue to reiterate the importance of considering specific values from farm inputs and on the farm accounting for fuel pathways. Additionally, it would be most helpful

moving forward to fully illustrate or clarify where the values are changing in CA-GREET 4.0 from CA-GREET 3.0 and how they are specifically attributed to updates from Argonne GREET 2022. For example, emissions from farming in CA-GREET 4.0 appears to be higher than what our industry has seen in the values for Argonne GREET 2022. Similarly, several of our producers have inquired as to the emissions attributed to distillers corn oil (DCO) and that the updated calculator may somehow devalue DCO as a feedstock for biomass based diesel. My understanding in speaking with staff is that the value is the same, but just a more aggregated value from CA-GREET 3.0; however, it isn't very clear. Any further clarity on how these values are derived or how they differ is greatly appreciated.

More broadly, we look forward to working with CARB 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,



Chris Bliley  
Senior Vice President of Regulatory Affairs  
Growth Energy