



November 5, 2020

Rajinder Sahota
Division Chief, Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Ms. Sahota:

I am writing to you to express support for the Novel Technology Investment Credit (NTIC) program that was presented by Virent and Marathon in the LCFS Public Workshop on Oct. 15.

BIO is the world's largest biotechnology organization with more than 1,000 members worldwide. Among its membership, BIO represents over 85 leading technology companies in the production of conventional and advanced biofuels and other sustainable solutions to energy and climate change challenges. BIO also represents the leaders in developing new crop technologies for food, feed, fiber, and fuel. BIO member companies represent many of the low carbon fuel producers that will supply the State of California with the fuels for LCFS credit and compliance.

BIO and its members strongly support California's efforts to reduce the carbon intensity of transportation fuels and believe that biofuels can and must contribute significantly to this important objective. Biofuels can help toward this goal not only by displacing petroleum-based ground transportation fuels, but also petroleum-based fuels needed for commercial and military airline transportation.

BIO supports the NTIC program to advance the growing need for low carbon fuels in California. If implemented as intended, NTIC would support new and novel biofuel technologies produced through biotech processes. This could help companies, like our members, to bring new technologies for low carbon fuels to commercial scale. This program is structured to limit the LCFS programs risk in that investors will need to take the upfront risks to demonstrate the new technology is commercially and operationally viable. The NTIC program could bring significant additional investments into new low carbon fuels technologies, resulting in significant increases in production of low carbon fuels.

For these reasons, BIO encourages you to move the NTIC program forward in the CARB rule making process.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie Batchelor".

Stephanie Batchelor
Vice President, Industrial and Environmental
Biotechnology Innovation Organization (BIO)