



Ensuring the growth of the renewable fuels industry in Nebraska

February 20, 2024

California Air Resources Board

1001 I St.

Sacramento, CA 95814

Re: Comments from Renewable Fuels Nebraska on California's Low Carbon Fuel Standard

Chair Randolph and Members of the California Air Resources Board,

I write today to urge you to reconsider proposed changes to the Low Carbon Fuel Standard.

Specifically: On behalf of the hundreds of thousands of farmers, ranchers, producers, and workers here in Nebraska who help feed and fuel the world — and for the sake of our shared goal of reducing greenhouse gas emissions — we respectfully request for you to adopt a more technology-neutral, market-based approach that ensures that biofuels can contribute on a level-playing field to a cleaner, more efficient energy future in California and across the country.

In addition to general concerns that the proposed changes as currently envisioned would pick winners and losers among renewable energy alternatives, there are several specific factors to note as you continue the regulatory process.

These include our inability to provide more detailed comments with regard to the sustainability requirement proposal for crop- and forest-based biofuels without more information. Details such which third-party verifiers would be involved and what information said third-party verifiers would require are necessary, both to ensure equitable application in the real world and to ensure that interested stakeholders are able to provide informed feedback as soon as possible.

More broadly, the proposed changes to the Low Carbon Fuel Standard risk doubling down on California's inexplicable decision to effectively reject cleaner fuels and lower emissions through the failure to permit the use of E15.

For instance, if E15 had replaced E10 in California cars as recently as 2022, the Golden State would have enjoyed an additional greenhouse gas savings of 2.2 billion metric tons (CO₂e) that year alone.¹ And California residents could have joined drivers

¹ [Letter from Renewable Fuels Association, October 3, 2023.](#)

¹ [Renewable Fuels Association study, April 2023.](#)

nationwide in saving an average of more than 25 cents per gallon when filling up their tanks.²

Yet, despite the substantial greenhouse gas emissions benefits associated with E15 — and the significant financial savings to consumers — California continues to abstain from this commonsense step towards a better and cleaner energy future. And that hurts California residents from all walks of life both financially and environmentally.

We urge CARB to reconsider its approach towards the Low Carbon Fuel Standard before it makes the same kind of mistake again.

And we remain committed to working with you and other dedicated stakeholders to pave a better path forward that appropriately balances strident goals and the incredible technologies available to us today to help achieve them.

Sincerely,

A handwritten signature in black ink that reads "Dawn Caldwell". The signature is written in a cursive, flowing style.

Dawn Caldwell

Executive Director

Renewable Fuels Nebraska

dawnc@renewablefuelsne.org
