



**Amanda Parsons DeRosier**  
Vice President of Public Affairs and  
Investor Relations

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February 20, 2024

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Chair Randolph and Honorable Members of the Board,

Thank you for your continued dedication to enhancing air quality in the Golden State through the proposed updates to the Low Carbon Fuel Standard Program (LCFS). We commend your decision to further encourage and not restrict the use of crop-based feedstocks within the proposed LCFS amendments under consideration.

The proposed accounting requirement for crop-based feedstocks, to trace their origin and undergo independent certification, aligns with the California Air Resources Board's commitment to ensuring crop-based feedstocks do not contribute to adverse impacts associated with land use change or limiting food supply. This proactive approach addresses concerns raised by the Environmental Justice Advisory Committee (EJAC) regarding "expanse of global deforestation, unsustainable land conversion, or adverse food supply impacts."

Our company, Global Clean Energy, stands ready to assist CARB in achieving this important goal. As a California-based renewable fuel innovator with offices in Torrance and a renewable fuels production facility in Bakersfield, we work tirelessly to ensure renewable fuels that we produce can have the lowest possible carbon intensity. What sets us apart is our focus on producing ultra-low carbon renewable fuels using *Camelina sativa* (camelina), a crop that alleviates the foregoing concerns.

Unlike other renewable fuel feedstocks, camelina is nonfood. Camelina is quick to mature, is tolerant to drought, promotes biodiversity, sequesters carbon as it is grown, and provides soil health benefits similar to those of cover crops. Importantly, camelina does not displace food crops when grown. Instead, it grows on existing farmland during the fallow period between crop cycles - providing a new revenue source to farmers and rural agricultural communities while also strengthening our domestic energy supply. With these unique traits, camelina has the potential to be the lowest carbon intense renewable fuel feedstock on the market.

Labeled as an "Intermediate Crop," camelina falls under a new classification of biofuel and renewable fuel feedstocks. "Intermediate Crops" act as harvestable cover crops that can reach maturity during an idle or fallow period on existing farmland, which does not cause land use

change or adversely impact food supply. Intermediate crops like camelina can help California and our nation reach our renewable fuel and SAF goals responsibly through biomass.

As you endeavor to create an accounting mechanism to track feedstocks to their point of origin and develop the independent feedstock certification process recommended within your proposed LCFS rule, we encourage you to recognize the importance of emerging crops like camelina. By incentivizing the further adoption of "Intermediate Crops" among growers and renewable fuel producers, we can help ensure land use change is prevented, soil health is protected, and renewable fuel feedstock demand can be met responsibly.

As new crops, education and incentives are vital to ensure the continued adoption and future success of "Intermediate Crops" like camelina. Recognizing that newer feedstocks lack the resources of traditional commodities like soy or corn, we recommend that accounting rules should not place "Intermediate Crops" like camelina at a financial disadvantage as they establish themselves within the market.

As experts in this emerging field of "Intermediate Crops" we stand ready to work with CARB staff and others to lend data and provide guidance in the development of an accounting mechanism addressing GHG and air pollution emissions associated with feedstock production pathways.

We look forward to working together to ensure Intermediate Crops are supported while these accounting criteria are developed. Thank you for taking the time to consider our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Amanda Parsons DeRosier". The signature is fluid and cursive, with a large initial "A" and "P".

Amanda Parsons DeRosier  
Vice President of Public Affairs and Investor Relations  
Global Clean Energy | [www.GCEholdings.com](http://www.GCEholdings.com)