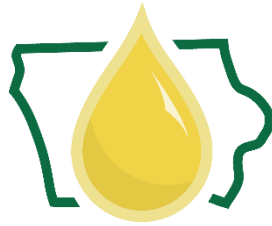


Iowa Renewable



Fuels Association

February 20, 2024

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

RE: IRFA Comments on Proposed LCFS Amendments

Iowa Renewable Fuels Association (IRFA) appreciates the opportunity to provide comments to CARB regarding potential amendments to the Low Carbon Fuel Standard (LCFS) (“Proposed Amendments” or “Proposal”). The IRFA is the independent state trade association representing ethanol, biodiesel, renewable diesel, and renewable natural gas producers from across Iowa. In total, Iowa has 42 ethanol refineries capable of producing over four and half billion gallons annually, accounting for about a thirty percent of the United States total ethanol production. Iowa is also the largest biodiesel producing state, with 10 plants capable of producing around four hundred million gallons annually or roughly twenty percent of the United States total biodiesel production. Ultimately, California is a major market for each of these low carbon, renewable fuel segments.

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. This includes but is not limited to what third-party verifiers will be looking for or even who are the approved third-party verifiers. In our view, CARB has not provided the public and regulatory community notice or the opportunity for stakeholders to comment on the validity of these new requirements.

Furthermore, we believe crop-based biofuels, which again currently provide the majority of credit-generating fuels for the LCFS program, are being singled out for more stringent criteria. This is all on top of not allowing crop-based biofuels the ability to include on-farm activities such as cover crops or no till practices that increase sustainability while dramatically lowering crop-based biofuels carbon intensity (CI) score. How is this following the spirit of “technology neutrality” if only crop-based biofuels are penalized and treated unfairly?

To further proof this point, ethanol gets lumped in with other crop-based and forestry-based biofuels with worse LUC penalties like palm oil proving the unfair application of said sustainability requirements that heavily penalize U.S. corn ethanol. In fact, the benefits of ethanol are routinely proven including recently by [IFP Energies](#)

[nouvelles \(IFPEN\)](#) which found that “compact” plug-in hybrids that run on E85 (85% ethanol, 15% gasoline), are comparable in carbon neutrality to electric vehicles when accounting for all emissions in connection with the vehicle and its battery as well as the energy used across production, distribution and combustion. Finally, as U.S. airlines look to move to sustainable aviation fuel (SAF), crop-based biofuels like ethanol are one of the few feedstocks that are readily available and in needed quantities to meet this growing demand.

The LCFS has been a major national driver in low carbon fuel use and the push toward net zero energy. However, if the proposed changes are made, we would see a major step backwards from achieving our goal while pushing U.S. energy production away for new energy sources overseas. It would also raise questions about the stability of the LCFS program that could undermine future investments in technologies designed to help reduce carbon emissions from not just on-road vehicles, but aviation as well.

As it stands today, IRFA and its members firmly believe California’s LCFS should encourage, not prohibit, low carbon options for the consumers and while keeping the program truly technology neutral. I think we all can agree that we should let science decide the best route forward. However, this can only be done when there is a level-playing field without the scales being pushed down in favor of one particular technology or energy source.

If you have additional questions, please contact me at mshaw@lowaRFA.org or 515-252-6249. Also, if you or any of your staff would ever be interested in touring an Iowa biofuel production facility, visit an Iowa farm and other aspects of the biofuels supply chain in Iowa, IRFA and its members would love to host you.

Sincerely,



Monte Shaw
Executive Director
Iowa Renewable Fuels Association