



February 20, 2024

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed LCFS Amendment Comments

Dear California Air Resources Board,

Imperial Western Products is a biodiesel producer and organics recycling company based in Coachella, California. We would like to provide our perspective on several aspects of the proposed amendments.

Benchmark CI reduction schedule

Current low LCFS credit values are driven in large part by oversupply due to a rapid acceleration in the amount of imported renewable diesel to CA starting in 2021. This trend does not show any signs of abating. To increase and stabilize credit values in the short and medium term, we support increasing the one-time step down in 2025 from 5 % to 8 %. We would also encourage CARB to explore ways to build more flexibility into the AAM as to reduce lag time between the trigger criteria being met and the benchmark CI adjustment being implemented.

Less Intensive Verification

We echo the remarks of other producers and verification bodies to allow verification bodies to skip site visits to both production and intermediate facilities if they have visited the site in the last two years and issued a positive verification statement. Excessive site visit requirements add significantly to the cost of annual verification services, often require high CI air travel, and provide virtually no information which could not be provided by leveraging technology (photos, video calls, screen sharing).

Respectfully,

A handwritten signature in black ink, appearing to read 'Joe Boyd', written in a cursive style.

Joseph Boyd
Director of Engineering