



Deere & Company
801 17th St., NW Washington, DC 20006
Phone: 202-423-2273; Fax: 202-296-0100
E-mail: RauberJohn@JohnDeere.com

John W. Rauber, Jr.
Director & Counsel
U.S., Mexico & Canada Government Affairs

August 27, 2024

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: CARB Notice of Public Availability of Proposed Modifications ("15-Day Changes") to the Proposed Low Carbon Fuels Standard Amendments, released on August 12, 2024.

Deere & Company ("John Deere") appreciates this opportunity to submit comments following the California Air Resources Board's ("CARB") August 12, 2024 release of Proposed Modifications to its Proposed Low Carbon Fuel Standard Amendments, and specifically the proposed changes to credits for biomass-based diesel (new subsection 95482(i)).

John Deere supports policies that promote an expanding, sustainable supply of U.S.-grown renewable fuels and feedstocks. For decades, U.S. renewable fuels, including biomass-based biofuels, have provided cleaner-burning transportation fuels to U.S. consumers. It is John Deere's hope that, backed by strong fuels policies, U.S.-grown biofuels will continue to play a key role in decarbonizing the U.S. transportation sector.

Deere believes that the proposed limitation on credits for biomass-based diesel produced from virgin soy and canola oils is both unnecessary and counterproductive to the state's decarbonization goals. By limiting LCFS credits for biomass-based diesel, proposed subsection 95482(i) would effectively cap the volume of biomass-based diesel allowed into California's transportation fuel supply. Once the proposed 20 percent cap is met, additional low-carbon fuels made from soy and canola oils would be assigned a pre-determined carbon intensity score that does not reflect the sustainable, well-documented carbon reduction benefits they provide¹.

The exponential growth in adoption of climate-smart ag practices, precision technologies and data-enabled farming have brought about significant sustainability gains and production efficiencies². According to USDA data, most recent increases in U.S. production of soybeans, for example, can be attributed to increases in yields per acre. Over the past three decades, average U.S. soybean yields have risen from 32.6 to 49.5 bushels per acre, a nearly 52 percent increase.³ As productivity has increased, so has farmers' ability to generate and analyze field-level data that allows for measuring, documenting and calibrating the carbon-reducing impacts of climate-smart practices. The use of precision equipment and technologies has created a virtuous cycle of generating the data to track performance, and then the insights to improve that performance over time.

The proposed addition of subsection 95482(i) includes the rationale that California seeks to "avoid sending a long-term signal for virgin soy or canola oil to serve California demand." Yet even as California's progress towards zero-emissions continues, the demand for reliable supplies of liquid, low-carbon biofuels will continue for years to come. These fuels are and will remain the most viable, affordable option for many segments of California's economy, including heavy duty and offroad users. By limiting the availability of LCFS credits for biomass-based diesel, the state would leave rural and off-road fuel users with fewer alternatives, not more, along with higher fueling costs. This would be especially problematic for many California farmers who have a need for higher-powered equipment that cannot be met through battery electric alternatives. By ignoring this reality, proposed



subsection 95482(i) will stifle decarbonization efforts and raise fueling costs for important segments of California's economy.

Deere reiterates comments it submitted to CARB on March 15, 2023, encouraging the Board, rather than placing caps on virgin oil feedstocks, to consider convening an Expert Working Group ("EWG") to provide a third-party evaluation of this matter and report back to CARB on its findings and any recommendations. Given that caps on virgin oil feedstocks would disproportionately impact those in the oilseed and agricultural industries, we recommend that those sectors be adequately represented among the those who comprise the EWG. In addition, we recommend the EWG conduct a review of the LCFS' indirect land use change ("ILUC") modeling data to ensure the most current scientific data is being utilized.

John Deere appreciates the opportunity to comment as CARB continues implementation of the LCFS and considers program changes. We urge CARB to set aside the proposed addition of a cap on biomass-based fuels and instead initiate a stakeholder process to thoroughly evaluate the necessity and impacts of such a restriction.

Sincerely,

John W. Rauber, Jr.

¹ H. Xu, et al. (2022) [Life Cycle Greenhouse Gas Emissions of Biodiesel and Renewable Diesel Production in the United States | Environmental Science & Technology \(acs.org\)](#)

² Association of Equipment Manufacturers (2021) [Environmental Benefits of Precision Agriculture \(aem.org\)](#)

³ U.S. Department of Agriculture (2024) [National Agricultural Statistics Service - Charts and Maps - Soybeans: Yield by Year, US.](#)