



August 27, 2024

Steven S. Cliff, Ph.D.  
Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Comments on Proposed 15-Day Changes to Proposed LCFS Regulation Order**

Dear Dr. Cliff:

As the largest producer of renewable diesel in the United States and the single largest generator of credits under the California Low Carbon Fuel Standard (LCFS), Diamond Green Diesel LLC (DGD) strongly supports the increased step-down in the carbon intensity benchmarks as proposed in the August 12, 2024 15-day comment package.

As CARB staff have recognized, LCFS credit prices have plummeted in recent years, undermining investments necessary to stimulate continued expansion of the clean technology sector. Having recently invested approximately \$315MM to develop production facilities for sustainable aviation fuel (SAF), we are reassured to see CARB's increased commitment to setting targets that are realistic and attainable, yet ambitious enough to reenergize the LCFS credit market. This increase in ambition is particularly welcome in light of the current 15-day proposal, which eliminates the obligation on jet fuel.

We strongly urge CARB to approve the regulation on November 8<sup>th</sup> without further delay. Additionally, we request that once the rulemaking process is finalized, CARB staff provide clear guidance to address practical issues related to implementation of the sustainability guardrails and crop cap measures. We encourage staff to collaborate closely with the regulated community post-adoption to develop comprehensive guidance, ensuring that these new measures are implemented in a practical, efficient, and transparent manner.

Thank you for your continued work on the LCFS program and for considering our views on this important issue. If you should have any questions, please feel free to contact me at any time.

Sincerely,

Sandra Dudley  
President