



August 27, 2024

Chair Liane Randolph
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Via Electronic Submission

Re: Comments on the 2024 Proposed Amendments to the Low Carbon Fuel Standard

Dear Ms. Randolph and Members of the California Air Resources Board,

Heartwell Renewables appreciates the opportunity to provide comments on the California Air Resources Board's (CARB) proposed 15-Day Changes to the Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation (15-day package).

Heartwell Renewables is a unique joint venture between affiliates of The Love's Family of Companies and Cargill to produce and market renewable diesel (<https://heartwellrenewables.com/>). Heartwell's renewable diesel (RD) production facility is currently under construction in Hastings, Nebraska. Once operational in early 2026, the facility will produce an estimated 80 million gallons of RD per year. This facility is a significant investment for both companies, and the facility will be fully feedstock flexible although expects to primarily utilize low carbon intensity (CI) feedstocks.

Thank you in advance to the staff for consideration of the points raised below:

- **Heartwell does not support different treatment between RD production facilities.** CARB already incentivizes feedstocks based upon CI score. Additional penalties or restrictions, such as the proposed 20 percent cap on soy and canola feedstocks, will result in restricted commercial flexibility for no environmental benefit. Further, the Heartwell Renewables RD facility operations will begin in 2026. As the new facility comes online, under the proposed regulations Heartwell would be impacted by the 20 percent cap while other operational facilities would not be impacted until 2028. Heartwell Renewables foremost recommends no restrictions on feedstock flexibility and elimination of the proposed 20 percent cap. Second, any such restrictions should be applied equally and fairly across facilities; the proposed 20 percent cap should not be implemented sooner than 2028 for new facilities.

- **Heartwell does not support different treatment between renewable diesel and sustainable aviation fuel (SAF).** The 20 percent cap is proposed to apply only to biomass-based diesel. Yet both RD and SAF use the same feedstocks as inputs and the technologies are very similar. In fact, most SAF production results from facilities that also have the capability to produce RD. There is no basis to provide flexibility to SAF while limiting RD. Heavy-duty electrification will take decades, and the market will naturally adjust over time in response. Heartwell Renewables recommends parity in regulations between RD and SAF production.

Thank you for this opportunity to provide comments regarding these proposed amendments to the LCFS. Heartwell Renewables is a joint venture between two industry leaders in fuels and agriculture. We have a shared commitment to reducing GHG emissions in the transportation sector. We look forward to working with CARB staff and leadership on issues impacting the future of renewable diesel.

Thank you for your consideration,

Spencer Haines

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Heartwell Renewables Board of Managers

Patrick Locken

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