



November 5, 2020

Rajinder Sahota
Division Chief, Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Ms. Sahota:

I am writing to you to express support for the Novel Technology Investment Credit (NTIC) program that was presented by Virent and Marathon in the LCFS Public Workshop on Oct. 15, and Northwest Advance Bio-Fuels LLC encouragement that CARB move the NTIC program into the next rule making process for incorporation into the LCFS.

Northwest Advance Bio-Fuels is the developer of a second generation, commercial scale, cellulosic renewable bio-fuel refinery with a mission to meet the growing demand for "green" Sustainable Aviation Fuel. Utilizing proven, integrated thermochemical process technologies and Qualified "Woody Biomass" feedstock, including forest residue, slash and sawdust, the Project will produce 60+ million gallons annually of ASTM D7566 compliant Sustainable Aviation Fuel in Washington state.

Northwest Advance Bio-Fuels supports the NTIC program because we believe it is the correct approach to advance the growing need for low carbon fuels in California. It will help companies, like ours, bring new technologies for low carbon fuels to commercial scale. We believe the program is correctly structured to limit the LCFS programs risk in that investors will need to take the upfront risks to demonstrate the new technology is commercially and operationally viable. Additionally, administrative controls to limit the number of credits awarded to between five and seven and a half percent of deficits will help to ensure existing investments are not placed at a disadvantage and can be implemented under the existing CARB administrative infrastructure with no cash outlays by the State of California. We believe that the NTIC program will bring significant additional investments into new low carbon fuels technologies, resulting in significant increases in production of low carbon fuels.

My company could utilize the NTIC program to produce this First Of A Kind (FOAK) woody biomass to SAF project to meet the growing demand of commercial airlines flights from key California metropolis consistent with CARB clean air and emission reduction goals.

For all these reasons, Northwest Advance Bio-Fuels encourages you to move the NTIC program forward in the CARB rule making process.

Respectfully,

A handwritten signature in black ink that reads "Dave Smoot". The signature is fluid and cursive, with the first name "Dave" and last name "Smoot" clearly distinguishable.

Dave Smoot



David P. Smoot

CEO

U. S. Advanced Bio-Fuels, Inc.

Manager for:

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