



October 16, 2024

Ms. Rajinder Sahota
Deputy Executive Officer - Climate Change & Research
California Air Resources Board
1001 I Street
Sacramento, California 95814

Dear Ms. Sahota:

Thank you for the opportunity to comment on Second 15-Day proposed changes to California's Low Carbon Fuel Standard (LCFS) Amendments.

Acelen Renewables is committed to driving the energy transition through innovative, sustainable, and competitive energy solutions. We plan to produce up to 20,000 barrels per day of sustainable aviation fuel and renewable diesel by 2027, while developing a novel feedstock – a native Brazilian species called Macauba – which is highly productive in terms of oil yield and will be grown on degraded soils, allowing our project to minimize indirect land use change (ILUC) and maximize the carbon intensity (CI) reduction potential. Our company is fully committed to more sustainable practices from seed to fuel, with a focus on compliance and full traceability across the value chain and reduced water and energy consumption during production.

While Acelen Renewables commends and shares the aims of the California Air Resources Board (CARB) to drive more aggressive decarbonization across the transportation sector, we were disappointed by the Agency's decision *not* to address the broad concerns expressed by not only the American Biofuels Association, but dozens of other participants in the renewable diesel supply chain, regarding the 20% production limit on renewable diesel produced from soy and canola oil. Adding sunflower oil to the feedstocks subject to the 20% limit perpetuates what we think is a misguided policy, intended to limit renewable diesel production based solely on the feedstock.

Picking winner and loser feedstocks casts aside the key tools that both California and the Federal government have developed and updated to determine the life-cycle emissions of fuels, with a strong indirect land use change as a primary component. It also discourages innovation from being developed and deployed that would lower the indirect land use change (ILUC) impacts from these feedstocks.

As such, we suggest CARB remove the 20% limit altogether, rather than adding new feedstocks to it, and rely instead on the new sustainability provisions in the amendments package and continued refinement of the ILUC factor in the CA_GREET model, providing

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technology and feedstock agnostic policy environment wherein carbon intensity scores speak for themselves, and the best solutions rise to the top.

We also support CARB's formation of an expert stakeholder advisory committee to further explore how energy-producing crops and forest waste biomass can be produced in the most sustainable and environmentally sound manner possible to produce the lowest carbon-intensive biofuels that meet the leading-edge LCFS program's goals.

Finally, we want to support the directive from CARB Board members to staff at the September 12, 2024, joint hearing of the Board and Environmental Justice Advisory in seeking a regulatory pathway for alternative jet fuel in the LCFS regulation. We strongly support a policy that incentivizes the production and utilization of alternative jet fuel in California, and we believe the LCFS regulation enables both goals. We specifically support the directive from several CARB board members that the state must continue to work towards the development of this policy. We would hope that CARB staff can lay out a regulatory plan at the November 8, 2024 Board meeting for alternative jet fuel in response to the board members' guidance.

Thank you for the opportunity to comment on these additional modifications to the LCFS amendments. We would be proud to help California achieve its LCFS and overall climate change goals, and hope that the current amendments to the LCFS can be adjusted to encourage the significant investments that we, and our capital partners, are prepared to make to get us all to a cleaner and more sustainable future.

Respectfully submitted,

Marcelo Cordaro

Chief Operating Officer

A handwritten signature in black ink that reads 'MARCELO HENDRO CORDARO'.

Acelen Renewables

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