

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

Re: Public Hearing to Consider Proposed Low Carbon Fuel Standard Amendments

Dear Chair Randolph and Board Members,

We appreciate the opportunity to provide comments on the California Low Carbon Fuel Standard and the proposed amendments.

Fidelis New Energy, LLC (“Fidelis”) is an energy transition company driving decarbonization through investments in renewable fuels, low-carbon intensity products, and carbon capture and storage. Using proprietary technology and processes, Fidelis develops, invests, and delivers climate positive and carbon negative infrastructure to reach carbon reduction and climate positive targets. Fidelis develops and invests in carbon negative sustainable aviation fuel, renewable diesel, renewable naphtha, clean hydrogen, and clean fuel infrastructure, in addition to developing and operating CO₂ capture units, pipelines, sequestration wells, and related transportation and sequestration infrastructure.

Fidelis supports the California Low Carbon Fuel Standard and applauds the immense success of the program.

Over the ~15 year history of the program, the California LCFS has displaced over 25 billion gallons of petroleum fuels, reduced the carbon intensity of California’s transportation fuels by >12% (achieving the targeted 10% reduction in GHG emissions almost a decade before 2030), and spurred billions in low-carbon investments.¹ These real, measurable impacts of this program make the California LCFS a pinnacle achievement in climate leadership, and one of the most successful greenhouse gas reduction programs in the world.

Fidelis applauds the leadership of the board in delivering the monumental success of the LCFS program and urges the board to adopt the proposed amendments to the LCFS to cement the continued success of the program for decades to come.

The proposed amendments to the LCFS will enable California to continue to lead the world in climate impact reduction and deliver cleaner air, lower transportation costs, and reduced greenhouse gas emissions.

In addition to the above statement of support for the LCFS program, Fidelis provides the following comments in support of the proposed modifications contained in the LCFS amendment.

¹ California Air Resources Board. “California Low Carbon Fuels Standard April Workshop Slides”, April 10, 2024.
ww2.arb.ca.gov/sites/default/files/2024-04/LCFS%20April%20Workshop%20Slides.pdf

Fidelis supports the proposed CI benchmarks and mechanisms to support the long-term stringency of the program including the 9% stepdown in 2025 and the Automatic Acceleration Mechanism (“AAM”).

The increased stringency in CI benchmarks, the 9% stepdown in 2025, and AAM will significantly strengthen the LCFS program and ensure the continued success of the program. These steps will address the current overperformance of the program and provide a concrete mechanism for addressing future overperformance, providing the long-term confidence required to support continued low carbon fuel investments.

Fidelis supports the inclusion of forest-derived biomass feedstocks in the California LCFS.

Fidelis supports the inclusion of forest-derived biomass as an eligible feedstock under the California LCFS. This inclusion enables novel low carbon fuel pathways necessary to support the continued reduction in transportation emissions and supports healthier US Forests that are less susceptible to forest fires.

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Thank you for the opportunity to submit these comments.

Respectfully submitted,



Daniel Shapiro

CEO

Fidelis New Energy, LLC