

April 18, 2024

Steve Cliff  
Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
(Comments submitted electronically)

**RE: Proposed Third 15-Day Changes to Proposed LCFS Regulation order**

Dear Executive Officer Cliff,

This letter is submitted on behalf of my client Raízen Energia S.A. (“Raízen”). Raízen appreciates the opportunity to provide comments on the Proposed 15-Day Changes to the Low Carbon Fuel Standard (LCFS) Regulation.

We recognize and commend the efforts made by CARB to enhance the clarity and precision of the regulatory language in response to the Office of Administrative Law’s (OAL) direction. The updated language contained in the 15-Day Changes addresses the ambiguity concerns raised by OAL, contributing to improved regulatory transparency and compliance.

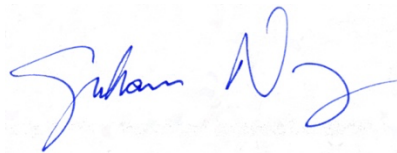
In particular, we welcome the explicit recognition and incorporation of more regionalized tools, such as MapBiomass, in the Land Use Change (LUC) section. This is a valuable step forward in capturing land use dynamics with greater granularity and local accuracy. This recognition of regional tools and expertise reflects CARB’s openness to integrating credible, science-based data sources from producer countries like Brazil to inform carbon intensity determinations.

We are hopeful that these improvements will pave the way for a more nuanced and precise assessment of LUC emissions, particularly for sugarcane-based biofuels.

Looking ahead, we look forward to supporting CARB's work by sharing additional data sources and expertise from Brazil that can enable further refinements of LUC estimates and other sustainability assessments. We also look forward to continuing to engage in constructive dialogue and technical collaboration.

Thank you for your leadership and continued commitment to scientific integrity and international cooperation in advancing low-carbon fuels.

Sincerely,



Graham Noyes  
Noyes Law Corporation  
On Behalf of Raízen