

April 21, 2025

California Air Resources Board
1001 I Street Sacramento, CA 95814

Via electronic submittal: <https://ww2.arb.ca.gov/lispub/comm/bclist.php>

RE: Response to April 4th 15-Day Modifications to Proposed Regulation Order

Dear California Air Resources Board,

Advanced Biofuels Canada is the Canadian national trade association for advanced biofuels and renewable synthetic fuels. ABFC members produce a portfolio of liquid low-carbon fuels (including alternative jet fuels), sustainable feedstocks, and intermediary products. Our members operate over 10 billion gallons of low carbon fuel production capacity globally and are significant suppliers to renewable and low carbon fuel regulations in Canada, the US, and worldwide. Many of our members have operations in both the United States and Canada.

Regarding the Proposed Low Carbon Fuel Standard Amendments posted on April 4, 2025:

- The modified language in section § 95488 (d) (*'the Executive Officer shall not accept new fuel pathway applications for biomass-based diesel, if the number of unique Class 3-8 ZEVs reported or registered in California exceeds 132,000 ZEVs or NZEVs on December 31, 2029'*) should be updated in consideration that Classes 3 – 8 is an exceedingly broad a category of vehicles.

ZEV penetration may be higher in lower Classes, with Classes 7 -8 lagging behind. We suggest that specific ZEV penetration values be created for Classes 7 – 8 to ensure that new biomass-based-diesel pathway holders are able to produce fuels for this harder-to-decarbonize vehicle category as the LCFS program continues.

- ABFC reiterates stated concerns submitted in October 16th on the previous 15-day comment period regarding the 20% credit generation limit in § 95482 (i). ABFC suggests that CARB take a 'risk-based approach' that relies on quantitative analysis to determine which feedstocks are

subject to any type of credit creation limit. This approach is similar to that used in considering ILUC in the Renewable Energy Directive of the European Union and is referred to in the Canadian Clean Fuel Regulations. This approach keeps the LCFS as a 'science-based policy' that makes decisions based on evidence and objective data.

Thank you for this opportunity to provide comments.

Yours truly,

Advanced Biofuels Canada