



Ensuring the growth of the renewable fuels industry in Nebraska

May 3, 2024

Liane Randolph
Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
Via electronic submission

RE: Renewable Fuels Nebraska Comments on April 10th LCFS Workshop

Chair Randolph,

On behalf of Renewable Fuels Nebraska, I appreciate this opportunity to offer written commentary on the proposed amendments to California's Low Carbon Fuel Standard (LCFS). Renewable Fuels Nebraska represents a robust community of biofuel producers and advocates, with our membership encompassing all 24 of Nebraska plants producing over 2.2 billion gallons of renewable fuel annually, alongside 55+ associated businesses and numerous supporters nationwide. Our collective mission focuses on enhancing fuel choices for consumers, improving air quality, advancing environmental stewardship, and diversifying our energy sources to bolster green jobs, support family farms, and reduce transportation fuel costs.

Our previous submissions have detailed the critical role that low carbon biofuels and higher biofuel blends play in achieving California's climate objectives. Biofuels have significantly contributed to the LCFS program's success and are well-positioned to continue this trajectory with thoughtful program revisions.

We commend the California Air Resources Board's (CARB) assessment of E15 as a means to reduce greenhouse gas (GHG) emissions and offer economic benefits to California motorists. Since the U.S. EPA sanctioned E15 in 2011, its adoption has surged to 3,400 retail locations across 32 states. This expansion highlights a national acceptance, contrasting sharply with California's current stance, as it remains the only state yet to authorize this efficient and eco-friendly fuel. Should CARB approve and prefer E15 over E10, this switch could equate to removing over 400,000 internal combustion engine vehicles from California roads, all without adverse effects on consumers.

We are also appreciative of CARB's recent updates to the California Transportation Supply (CATS) Model, which now incorporates the benefits of carbon capture



Ensuring the growth of the renewable fuels industry in Nebraska

utilization and sequestration (CCUS) in bioethanol production. This revision, prompted by incentives in the Inflation Reduction Act, significantly lowers the assumed carbon intensity of E85, facilitating a more substantial GHG reduction in California. The widespread use of E85, particularly in over 1.3 million flex-fuel vehicles within the state, underscores the potential for further emission reductions and supports our advocacy for enhanced FFV production and E85 availability.

The proposed sustainability certification requirements for crop-based biofuels remain a concern, particularly regarding the perceived indirect land use change (ILUC) impacts. The inclusion of a fixed ILUC penalty seems redundant and punitive, especially given advancements in agricultural productivity and sustainable farming practices. The proposed auditing processes for sustainability also appear to extend beyond the LCFS's scope, potentially imposing unnecessary burdens on biofuel producers without corresponding environmental benefits.

We also urge a reconsideration of the LCFS provisions regarding low-carbon intensity (CI) power sourcing. Currently limited to hydrogen production, this oversight neglects the substantial CI reduction opportunities available through biofuel production. Allowing bioethanol producers to engage in new low-CI power contracts could significantly advance California's leadership in sustainable energy utilization.

Finally, we support CARB's initiatives to foster the sustainable aviation fuel (SAF) market, essential for decarbonizing the aviation sector. We encourage ongoing collaboration with SAF stakeholders to expedite the adoption of these crucial fuels.

Thank you again for the opportunity to participate in the April 10th, 2024 workshop. We are committed to collaborating with CARB to ensure biofuels play a pivotal role in creating a more sustainable fuel mix and helping California meet its ambitious climate goals.

Sincerely,

A handwritten signature in black ink that reads 'Dawn Caldwell'.

Dawn Caldwell
Executive Director
Renewable Fuels Nebraska