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May 9, 2024

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Global Clean Energy's Comments on Proposed Amendments to the Low Carbon Fuel Standard

Dear Chair Randolph and Honorable Members of the Board,

Thank you for your continued dedication to enhancing air quality in the Golden State through the proposed updates to the Low Carbon Fuel Standard Program (LCFS). We appreciate the opportunity to comment on the proposal put forward by staff during the April 10 workshop.

As mentioned in our previous comment letters, Global Clean Energy stands ready to assist CARB in achieving its goals of ensuring renewable fuels deliver on their promise of sustainability. Importantly that includes safeguarding against land use change, deforestation, and other adverse impacts on the climate and the environment. As a California-based renewable fuels innovator with a production facility in Bakersfield, we work tirelessly to ensure our products have the lowest possible carbon intensity. What sets us apart is our focus on producing ultra-low carbon renewable fuels using *Camelina sativa* (camelina), a crop that does not contribute to any of the environmental concerns outlined above.

Camelina is a unique renewable fuel feedstock that offers regenerative agricultural benefits to the natural environment, soils, and farmers. It also sequesters carbon below ground while being grown, improving soil health similar to traditional cover crops. Camelina matures quickly, tolerates drought, and promotes biodiversity in fields where it is cultivated. Notably, camelina does not displace food crops. Instead, it grows on existing farmland during the fallow period between crop cycles — providing a new revenue source to farmers and rural agricultural communities while also strengthening domestic energy security. Camelina's unique agronomic traits give it the potential to be the least carbon-intensive renewable fuel feedstock available today.

Sometimes referred to as a harvestable cover crop, camelina falls under a new classification of crop-based feedstocks called "Intermediate Crops." These crops are cultivated during an idle or fallow period on existing farmland, and as a result, they do not cause land use change or adversely impact food production. Intermediate Crops, such as camelina, can responsibly help the state of California and the country reach our decarbonization goals in the hard-to-abate sectors of aviation, marine, rail, and heavy-duty vehicles with biomass-based liquid fuels.

As you endeavor to create an accounting mechanism to track crop-based feedstocks to their point of origin and develop the independent feedstock certification process proposed by staff, we encourage you to recognize the importance of emerging Intermediate Crops like camelina. By incentivizing the adoption of Intermediate Crops among growers and renewable fuel

producers, we can help ensure land use change is prevented, soil health is protected, and renewable fuel feedstock demand can be met responsibly.

As currently written, the Sustainability Audit Process requirements put forward by staff will be costly for farmers to adopt, providing a barrier to entry for promising new feedstock crops like camelina. Recognizing that newer feedstocks lack the resources of traditional commodities like soy, corn, or canola, we recommend that accounting rules should not place Intermediate Crops at a financial disadvantage as they establish themselves within the market.

In addition, the proposal appears to set a new standard for sustainability beyond the scope of the regulation and its environmental impact. This includes a proposed evaluation of the economic sustainability of the applicant (e.g., farm) and a review of their social practices (e.g., worker treatment). These additional criteria have the potential to add considerable administrative load to farmers and fuel producers, which could result in lower participation in the LCFS.

Moreover, independent certification processes for crop-based feedstocks were recently outlined within the [Department of Treasury's Rule 40B guidance](#). This guidance mandates that in order to qualify for Federal tax incentives, crop-based feedstocks are required to meet USDA standards for climate-smart agriculture, or CSA, including no-till and cover cropping practices. This guidance is expected to be further expanded when Treasury introduces its guidance for Rule 45Z, the clean fuel production credit, in the coming months. Given this Federal certification is now in place, requiring secondary sustainability certification for feedstocks under the California's LCFS program would be duplicative.

More time and industry input are needed in this area. We encourage CARB to convene a stakeholder process before these sustainability audit criteria are finalized or adopted.

Global Clean Energy has extensive experience in Intermediate Crops and has been working in this field for over 15 years. We are also the global leader in camelina breeding and cultivation and are the only integrated company from seed to farm and farm to fuel. As experts in this new frontier of innovative crop-based feedstocks that also deliver regenerative agricultural benefits, we are eager to collaborate with CARB and other organizations. We stand ready to help develop appropriate sustainability criteria that address greenhouse gases and air pollution emissions related to feedstock production pathways.

We look forward to working together to ensure Intermediate Crops like camelina are supported while these sustainability criteria and standards are developed. Thank you for taking the time to consider our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Amanda Parsons DeRosier". The signature is fluid and cursive, with a large initial "A" and "P".

Amanda Parsons DeRosier



Chair Randolph and Members of the Board  
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Vice President of Public Affairs and Investor Relations  
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