



May 10, 2024

Liane M. Randolph
Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Via electronic submission

Re: Low Carbon Fuel Standard Workshop and Proposed Amendments, April 10, 2024

Dear Ms. Randolph,

Thank you for the opportunity to share additional feedback with the California Air Resources Board (CARB) following its April 10, 2024, public workshop on proposed regulatory amendments to the Low Carbon Fuel Standard (LCFS).

Ag Processing Inc (AGP) is a leading U.S. agribusiness engaged in soybean processing, refining, and biodiesel production, with a cooperative network representing approximately 200,000 U.S. farmers across five states. While our operations do not extend into California, our products significantly contribute to the state's biofuel supply chain, which supports direct and indirect employment across the region. Our integrated business model underscores a commitment to sustainability, highlighted by the environmental stewardship of our cooperative members and their farmer owners.

At AGP, our sustainability efforts are centered around processing soybeans into value-added products using fewer resources. These initiatives are exemplified by farmers' adoption of climate-smart practices that enhance soil health, preserve water, and improve air quality, often going beyond any regulatory requirement by proactively implementing measures such as no tillage, cover cropping, tree planting, and various edge of field practices. These measures have enabled a 19% reduction in the carbon footprint of U.S. soybeans from 2015 to 2021, alongside a 24% increase in yield and a decrease in chemical and fertilizer application.

We are increasingly concerned that the ongoing narrative around land use change and deforestation inaccurately groups the American farmers' responsible operations with those in regions like Brazil, where practices do not align with our commitment to environmental stewardship. To this end, we extend an invitation to you and your team to

visit a soybean processing facility in the Midwest to experience firsthand the sustainable measures implemented by AGP and the farmers we serve and support.

Furthermore, during the April 10 workshop, CARB's analysis rightly recognized that a cap or limitation on crop-based feedstocks is unwarranted as it risks undermining the gains in carbon reduction achieved through biomass-based diesel. This component of California's renewable fuel mix has been instrumental in displacing 60% of fossil diesel, thereby significantly reducing greenhouse gas emissions and pollutants such as PM2.5 and NOx.

We encourage CARB to adopt a targeted, risk-based approach to sustainability requirements that leverages existing frameworks like the Renewable Fuel Standard (RFS). This approach would support the continued use of low-carbon feedstocks without compromising the growth and sustainability of the biofuels industry, which is vital for achieving California's environmental and air quality goals.

Thank you again for the opportunity to comment and considering our perspectives. We look forward to constructive outcomes from the ongoing dialogue and future LCFS refinements.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Schaffer".

Chris Schaffer
Chief Executive Officer and General Manager
Ag Processing Inc