

March 27, 2024

Via Electronic Submission to AFP

Mr. Anil Baral
California Air Resources Board (“CARB”)
Low Carbon Fuel Standard
1001 I Street
Sacramento, CA 95814

Re: St. Bernard Renewables LLC, LCFS Tier 2 Pathway Application B0566
Response to Comment of Aida Ashouri

St. Bernard Renewables LLC (“SBR” or the “Company”) provides this response to the comment letter submitted by Aida Ashouri. The commenter raises a concern related to the use of crop-based feedstocks.

Section 95488.7(d)(5)(A) of the Low Carbon Fuel Standard (LCFS) regulation states: “Only comments related to potential factual or methodological errors will require responses from the fuel pathway applicant.” The comments received are not related to factual or methodological errors and, accordingly, no revision to SBR’s fuel pathway application are required. However, SBR desired to address the comments related to its pathway application as a participant in the LCFS program.

CARB’s LCFS program allows the use of both crop-based and waste-based feedstocks in the production of renewable fuel. During the required Life Cycle Assessment (LCA) process and use of the CARB CA-GREET 3.0 LCA model, the potential for land conversion related to crop-based feedstocks has been considered. The Indirect Land Use Change (ILUC) GHG emissions factor is required for both soybean oil and canola oil. ILUC emissions act as an incentive for fuel producers to prefer waste-based feedstocks but nothing in the regulation precludes the use purchase or processing of a crop-based feedstocks.

SBR appreciates the opportunity to respond to this comment. We reiterate our belief that no changes to SBR’s pathway application are required by these comments, and respectfully request that CARB certify the fuel pathways listed in Application No. B0566.

Sincerely –

Kei Rietz
Director, Regulatory Affairs
St. Bernard Renewables LLC