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|  |  | Joshua Kehoe  Granite Bay, CA 95746 |
| 🞂 | California Air Resources Board |  |
|  | 1001 I Street, Sacramento, CA 95814 |  |

Dear CARB Personnel,

As usual, thank you for providing a forum for public comments on Tier 2 LCFS applications.

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I support this pathway application. I appreciate the applicant’s pursuit of a more efficient biodiesel production method. The RepCat process used by Crimson appears to be a nice step towards more efficient BD production from all feedstocks. Biodiesel has been having a difficult go of things since RD production has ramped up so quickly. Additionally, CARB has favored RD over BD in its Off-Road Diesel and Commercial Harbor Craft legislation by mandating RD99/100 and not allowing for any BD/RD blending. I have left comments previously stating my disagreement with CARB’s logic and decision in that regard.[[1]](#footnote-1)[[2]](#footnote-2)[[3]](#footnote-3) In short, not allowing 5-20% BD/RD blends is throwing the baby out with the bathwater. Apropos to this application, CARB could do well to consider allowing BD blends up to 20% with RD for off-road and commercial harbor craft. It would support California feedstock producers as well as California biodiesel producers such as Crimson. These are real California-based jobs we are talking about. There will exist an ongoing need for liquid fuels in many industries for the foreseeable future, so I support any attempt to reduce the carbon intensity of these fuels. Crimson’s stated ability to utilize multiple feedstocks in an efficient manner is to be commended.

Sincerely,

Joshua Kehoe MD

September 4, 2024

1. https://ww2.arb.ca.gov/resources/documents/low-emission-diesel-led-study-biodiesel-and-renewable-diesel- emissions-legacy [↑](#footnote-ref-1)
2. ttps://www.arb.ca.gov/lispub/comm/iframe\_bccomdisp.php?listname=chc2021&comment\_num=3746&virt\_num=3 [↑](#footnote-ref-2)
3. https://www.arb.ca.gov/lispub/comm/iframe\_bccomdisp.php?listname=offroaddiesel2022&comment\_num=1 [↑](#footnote-ref-3)