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June 6, 2023

VIA ELECTRONIC FILING

Dr. Cheryl Laskowski,  
Branch Chief, Low Carbon Fuel Standard Team  
California Air Resources Board  
Submitted via LCFS Comments Upload Link

RE: Comments on "Auto-Acceleration Mechanism for the Low Carbon Fuel Standard"

Dear Dr. Laskowski:

Thank you for the opportunity to comment on the California Air Resources Board's (CARB) public workshop on Potential Regulation Amendment Concepts to the Low Carbon Fuel Standard (LCFS).

Gevo, Inc.'s (Gevo) mission is to produce energy-dense liquid hydrocarbons for drop-in transportation fuels such as gasoline, jet fuel, and diesel. Gevo's production process uses a combination of decarbonization technologies and sustainably farmed feedstock to produce fuels with substantially reduced carbon intensity (CI) compared to fossil fuel equivalents. We broke ground on our first sustainable aviation fuel (SAF) production facility, "Gevo Net-Zero 1" (NZ1), in Lake Preston, SD, in September 2022. This facility will use a three-part strategy to produce low-CI SAF: 1) use locally-sourced corn feedstock from farmers engaged in sustainable agriculture to both reduce on-farm greenhouse gas (GHG) emissions and sequester CO<sub>2</sub> in the soil; 2) decarbonize the fuel production process by replacing conventional fossil fuel inputs with wind energy, renewable natural gas, and green hydrogen; and 3) use carbon capture and sequestration (CCS) technology to reduce emissions from the production process further. The Gevo approach attempts to decarbonize every step of the fuel's life cycle.

Before commenting on the May 23rd LCFS Workshop, Gevo would like to reiterate our previous comments supporting the expansion of the compliance curve found in Scenario C, the addition of climate smart agricultural practices within the CAL-GREET model, and book-and-claim opportunities for hydrogen. We also have commented previously in opposition to potential crop-based biofuel limits and modifications to the way the LCFS handles renewable natural gas (RNG). Please see these specific points in our past comments.

## **Gevo supports the concept of an accelerator mechanism**

The LCFS is certainly a successful program, far exceeding its structured carbon reductions through over-compliance. While this success is yielding greater environmental benefits, it has also reduced credit prices and produced a significant credit bank. Gevo supports a mechanism that allows CARB to adjust the program between rulemakings to ensure the LCFS continues to spur the carbon reductions available in the market.

The fight to mitigate climate change is far from over and policies like an accelerator will provide California with the tools to monitor the program and adjust it when needed. This mechanism will also assist industry expansion in SAF production and other renewable fuels, providing investors and industry with an understanding that the LCFS will be supportive of additional gallons and not required to wait for a future rulemaking.

Gevo also supports comments from the Renewable Natural Gas Coalition and the Low Carbon Fuels Coalition here by reference.

Gevo's only concern with this proposal is that it could delay the important compliance curve adjustments discussed in previous workshops. We hope that adding the accelerator mechanism to this rule process does not stall the timeline, pushing out the final rule.

Thank you for the opportunity to comment on the CARB workshops on "Auto-Acceleration Mechanism for the Low Carbon Fuel Standard." We look forward to participating in this program as Gevo grows the production of SAF and other biofuels.

Respectfully,



Kent Hartwig  
Director of State Government Affairs



Gevo, Inc.



Karyn Jones  
Director of Sustainability



Gevo, Inc.