

Clean Fuels Alliance America

Thank you. My name is Scott Richards. I'm here on behalf of the Clean Fuels Alliance America, and CFFA represents biodiesel, renewable diesel, and sustainable aviation fuel producers in California and Oregon under their clean fuels program. The fuels used by our members account for 50% of the fuels used on and off road to comply with the clean fuel programs in both states. I'm here today to comment during the public hearing on life cycle accounting in the rules and the use of updated methodologies related to indirect land use changes. We would like to reiterate our previous request that a few topics be addressed during the rule making period. The first one focuses on the Washington grid model. Two, we'd like for methodologies to account for updated science related to indirect land use changes for canola production, similar to British Columbia's carbon intensity score for canola methyl Esters, and canola renewable diesel, along with the updated science for soil. The second element we'd love the rules to include is establish a mechanism in Washington's grid to reduce the carbon intensity of fuels for feed stocks, utilizing carbon [unintelligible 00:28:00] agricultural practices such as no-till. Thirdly, we would like for the rules to provide a mechanism for indirect accounting of electricity, hydrogen and renewable natural gas used in renewable fuel production facilities to allow them to pursue low carbon inputs that reduce their carbon intensity without having a direct connection. Finally, we remained a bit puzzled by the use of different lifecycle assessment models for corn, ethanol and soy, and canola biodiesel, even though the same models have been updated by Argonne National Laboratory for both feed stocks. The Clean Fields Alliance America would like to [unintelligible 00:28:48] the final rules to use Argonne's CCLUB approach [unintelligible 00:28:52] soy as it does for corn ethanol. By making these changes, it'll ensure the rules use consistent methodology, and reflect sound science-based approaches towards all issues, including life cycle assessments. With that, I'll conclude my remarks. Thank you for the opportunity.