



April 30, 2026

Rajinder Sahota, Deputy Executive Officer  
California Air Resources Board  
1101 I St.  
Sacramento, CA 95814

**RE: Highly Innovative Fuels on the Proposed Amendments to the Cap and Invest Program**

Dear Ms. Sahota,

On behalf of Highly Innovative Fuels, we appreciate the California Air Resources Board's continued work on the Cap-and-Invest Program and, in particular, the recent updates to § 95852.1, addressing exempt biomass-derived fuels.

In our earlier comments, we highlighted the importance of ensuring that this provision was clearly scoped to regulatory compliance claims so that it would not create unintended ambiguity for other emissions accounting contexts. We appreciate that the adopted language now provides greater clarity by specifying that no other entity may claim an emissions exemption to reduce a compliance obligation in the Cap-and-Invest Program or in a linked external GHG emissions trading system. This is a helpful and meaningful clarification that improves regulatory certainty while preserving the integrity of the program.

We commend CARB staff's responsiveness to stakeholder input and their targeted revision to strengthen the clarity of the regulation without undermining its environmental safeguards. Thank you for your continued leadership and for your consideration of these comments.

Sincerely,

James Outtrim

HIF