

April 23, 2019

Mr. James Duffy  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95184

RE: Potential Amendments to the Low Carbon Fuel Standard's Cost Containment Features

Dear Mr. Duffy,

The Renewable Fuels Association is writing to express our support to the California Air Resources Board's (CARB) proposal regarding potential amendments to the Low Carbon Fuel Standard's cost containment features.

The LCFS continues to be a successful policy that is driving innovation in commercially viable low-carbon transportation fuels, diversifying California's fuels, and is critical in implementing California's long-term climate goals. We encourage approaches that strengthen the program in ways that will accelerate sector development and innovation in this market for years to come. The cost containment features of the LCFS are an important element to the program's success, providing greater value to products as well as creating investor confidence.

CARB's proposal for allowing additional credit clearance mechanism (CCM) credits will provide further stability to the program in the event that there is a credit shortfall for a fuel supplier. We believe that CARB should adopt its proposed provision. Doing so would strengthen the LCFS and boost investment interest in the clean fuels market. Additionally, we substantially agree with the comments made by AJW, Inc. regarding the economic and environmental benefits CARB's proposal would deliver.

We encourage CARB to go forward with the rulemaking processes and adopt its proposal. Doing so will solidify market confidence in the stability and success of the LCFS. We look forward to working with CARB staff to advance the potential amendments to the LCFS regulation.

Sincerely,



Geoff Cooper  
President & CEO  
[www.ethanolrfa.org](http://www.ethanolrfa.org)