

Dear Sirs/Madames,

I would like to make several comments:

- Rather than simply requiring the production of a certain amount of alternative fuel, performance-based emissions intensity standards provide incentives for fuel producers to lower their carbon intensity, with the largest incentives going to the lowest-carbon fuels.
- To ensure that the clean fuel production tax credit achieves its intended purpose—reducing greenhouse gas emissions—incentive payments must be tied to meaningful and fuel-producer-specific lifecycle greenhouse gas analyses.
- Assigning an average carbon intensity for each fuel type would result in less accurate carbon accounting, and would block opportunities for real emissions reductions.
- Fuel lifecycle carbon intensity calculations should be granular and account for opportunities to reduce greenhouse gas emissions along the fuel production process. The calculation should also include farm-level emissions from biofuel feedstock production and allow for incentive payments for carbon reductions through climate-smart farming practices.

Thank you for this opportunity to make comments.

Sincerely,
Ron Alverson
Ag Producer

www.carbonharmony.org