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American Soybean Association Comments

Additional submitted attachment is included below.



June 15, 2026

Commissioner Nancy Skinner
California Energy Commission
715 P Street
Sacramento, CA 95814

Chair Lauren Sanchez
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted electronically via docket@energy.ca.gov

Re: Draft California Transportation Fuels Transition Plan (TN 269790-1) Docket No. 23-SB-02

Dear Commissioner Skinner and Chair Sanchez:

The American Soybean Association (ASA) appreciates the opportunity to provide comments on the Draft California Transportation Fuels Transition Plan (TFTP). ASA represents approximately 500,000 U.S. soybean farmers on domestic and international policy issues important to the soybean industry and has 26 affiliated state associations representing 30 soybean-producing states. U.S. soybean growers have long been committed to producing the world's food, feed, fuel, and thousands of bioproducts in a sustainable and climate-smart way.

ASA supports California's leadership in transportation decarbonization and thanks the California Energy Commission (CEC) and California Air Resources Board (CARB) for jointly developing the draft TFTP over the past several years. Notably, ASA appreciates the TFTP recognizing the long-term necessity of low-carbon liquid fuels while reducing statewide reliance on petroleum diesel, and acknowledges that certain transportation sectors continue to face operational and infrastructure limitations to electrification. ASA encourages the CEC and CARB to fully embrace this holistic approach to decarbonization by recognizing the value of domestically sourced biodiesel, renewable diesel, and sustainable aviation fuel (SAF) as scalable, commercially available solutions that complement electrification, support refinery transition, and deliver near-term emissions reductions. A CEC analysis demonstrates the state remains in a "mid-transition" phase where fossil fuel demand declines gradually while low-carbon technologies and fuels scale simultaneously. Aviation, maritime transportation, heavy-duty vehicles, rail, ports, and off-road equipment are expected to rely on liquid fuels well beyond 2045 in some applications. These realities reinforce the importance of maintaining and expanding access to low-carbon liquid fuels, including soy-based biodiesel, renewable diesel, and SAF.

Biodiesel and renewable diesel are available today, compatible with existing infrastructure, and capable of delivering immediate emissions reductions while zero-emission technologies continue to mature. Higher biodiesel blends such as B20 and above represent practical deployment opportunities for fleets, ports, marine support operations, off-road equipment, and other diesel-dependent sectors. As the CEC and CARB develop the final TFTP, biomass-based diesel (BBD) should not be characterized as a static or temporary solution, but rather as a proven long-term carbon reduction tool.

Importance of Domestic Biofuels Supply in California

Domestic biofuels and biomass-based diesel, including those derived from U.S. soybean oil, represent a key portion of California's clean transportation portfolio. Recent data demonstrates the essential role of BBD in reducing greenhouse gas (GHG) emissions, sustaining rural economies, and advancing the California's clean energy goals while maintaining fuel affordability.

State Usage

In 2024, California consumed over 900 million gallons of BBD, which represents 74% of all diesel use in the state.¹ California's BBD utilization in 2024 was supported by approximately 3 billion pounds of soybean oil and 1.7 billion pounds of other oilseed feedstocks, totaling nearly 2 million metric tons of CO₂ equivalent in GHG emission reductions.² Through the first three reported quarters of 2025, renewable diesel and biodiesel made up over 71% of all California diesel use³ and generated more carbon credits under the Low Carbon Fuel Standard (LCFS) than any other fuel type.⁴

Climate Benefits

According to a 2022 study, biodiesel and renewable diesel derived from soybean oil feedstocks reduce GHG emissions up to 69% compared to petroleum diesel.⁵ Statewide initiatives focused on reducing GHG emissions and air pollutants through the LCFS continue to drive demand for biomass-based fuels. When California adopted the LCFS in 2009, less than 1% of the state's diesel inventory included BBD. Presently, renewable fuels account for more than 71% of the state's diesel fuel supply⁶ and nearly half of California's GHG reductions under the LCFS.⁷

¹ Clean-Fuels-Alliance-America-Annual-Report-2024.pdf

² Advanced BioFuels USA – California's Proposed LCFS Cap on Soy, Canola Biofuels 'Far Worse than Anticipated' Public Comment DEADLINE August 27, 2024

³ CARB. Low Carbon Fuel Standard Data Dashboard. CARB, <https://ww2.arb.ca.gov/applications/lcfs-data-dashboard>

⁴ <https://www.cleantrucking.com/alt-fuels/biodiesel/article/15711224/biodiesel-and-renewable-diesel-use-will-increase-in-2025>

⁵ Life Cycle Greenhouse Gas Emissions of Biodiesel and Renewable Diesel Production in the United States | Environmental Science & Technology

⁶ Consumption of renewable diesel continues general growth trend on the U.S. West Coast - U.S. Energy Information Administration (EIA)

⁷ *Setting a lipids fuel cap under the California Low Carbon Fuel Standard*

The cleaner combustion of renewable diesel specifically supports reduced transportation maintenance, and results in associated savings of approximately \$0.015-0.02 per mile, including fewer diesel particulate filter changes.⁸ While California continues to pursue electrification and non-liquid fuel transportation technologies, the singular key driver of GHG transportation emissions reductions is the displacement of petroleum diesel by BBD.⁹

Prolonged Need for Biomass-Based Diesel in a ZEV Era

While California leads the nation in zero-emission vehicle (ZEV) deployment, BBD utilization will be needed to achieve carbon intensity reduction goals for the foreseeable future. According to the CEC and CARB, over 90% of heavy-duty vehicles on California roads today run on diesel¹⁰, and many will remain in service well beyond 2035.¹¹ The Advanced Clean Fleets regulation allows legacy internal combustion vehicles to operate through 2042 and beyond for certain fleets and uses.¹² To advance the goals of the TFTP, California must balance investments to encourage increased ZEV adoption with policies that support a BBD inventory that is both affordable and accessible.

According to CEC publications (*Transportation Energy Demand Forecast Results, October 2023; LCFS 2023 SRIA*), baseline modeling assumptions for transportation energy demand (flat ZEV adoption and LCFS carbon intensity reduction benchmarks) indicate substantial continued consumption of diesel—particularly BBD—through 2035 and beyond in heavy-duty sectors (e.g., freight, construction, agriculture). In this scenario, while also acknowledging heightening affordability concerns, BBD offers the existing transportation fleet with immediate, scalable emissions reductions before future ZEV turnover. Furthermore, biofuels serve as a bridge that complements electrification, particularly where ZEV adoption is delayed by infrastructure constraints (e.g., rural areas, limited grid access), availability and affordability of long-haul, off-road, or heavy-duty technologies, and slow turnover of heavy-duty fleets.

Economic Sustainability and Energy Security

Nearly half of U.S. soybean oil is used in BBD production, and vegetable oils account for over 25% of U.S. renewable diesel feedstocks.¹³ Vegetable oil processing capacity is increasing, and domestic biofuel feedstocks can support 5.3 billion gallons of BBD production in 2026/27 and 6.7 billion gallons by 2030¹⁴.

⁸ Bennett, Stephen. US Trucking Embraces Renewable Diesel for Cleaner Operations. Transport Topics, 2 August 2024, <https://www.ttnews.com/articles/trucking-renewable-diesel>

⁹ California Diesel GHG Emissions Drop Faster Than Projected as Renewable Diesel Surges | Stillwater Associates

¹⁰ Medium- and Heavy-Duty Zero-Emission Vehicles in California

¹¹ ACC II ISOR

¹² Advanced Clean Fleets Regulation - High Priority and Federal Fleets Overview | California Air Resources Board

¹³ https://s.giannini.ucop.edu/uploads/pub/2024/06/27/v27n5_3.pdf

¹⁴ Feedstock Study - NOPA

Investments in domestic biofuel feedstock processing minimize reliance on imports that are vulnerable to evolving trade policies and support a resilient domestic supply chain from the farmgate to the fuel pump. In addition to greater supply chain stability, preferencing BBD produced using domestic agricultural feedstocks supports rural economic growth and job creation as positive BBD market signals continue to drive investment across the value chain.

Key Recommendations for the Transportation Fuels Transition Plan

1. Update assumptions on biomass-based diesel deployment

ASA urges the CEC and CARB to revise BBD demand assumptions. The draft TFTP assumes BBD maintains a relatively static share of diesel demand, which does not reflect current market growth, refinery conversion activity, infrastructure readiness, or regulatory developments enabling higher biodiesel blends.

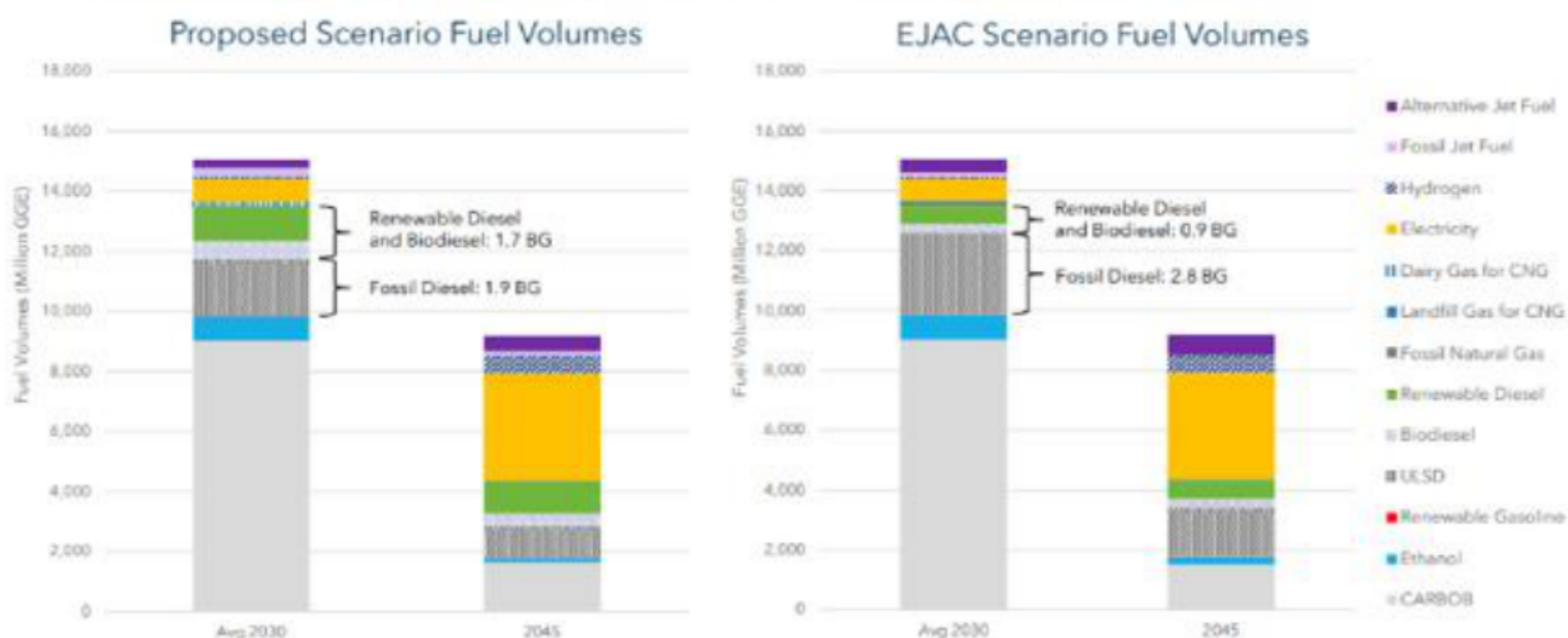
Before finalizing the TFTP, the CEC and CARB should develop higher-deployment scenarios for BBD that account for expanded use of B20 and above, where appropriate. These fuels can reduce emissions immediately in existing diesel equipment, provide practical compliance pathways for fleets, and support fuel reliability during refinery transitions.

2. Recognize domestic feedstocks, including soybean oil

The CEC and CARB should provide a clear policy signal supporting domestic, traceable biofuel feedstocks. U.S. soybean oil offers reliable and scalable feedstock supply for BBD while supporting farmers, rural economies, and domestic energy security through a transparent supply chain. The final TFTP should avoid policies and precedents that discourage the use of domestically produced agricultural feedstocks and increase dependence on imported biofuels and feedstocks sourced through less transparent, and potentially fraudulent supply chains. New federal biofuel policies like the 45Z Clean Fuel Production Credit acknowledge significant sustainability verification challenges with imported feedstocks, and state policies should build on these domestic sourcing incentives rather than operate in conflict of them.

Currently, virgin vegetable oils like soybean oil account for approximately 30% of the feedstock used in the California biofuels market.

Modeling Comparison: Fuel Volumes



Source: California Air Resources Board, April 2024 Public Workshop

CARB modeling suggests that by 2030, 80% of vehicles in California will continue to have combustion engine technology. Last year, CARB staff indicated that adopting the Environmental Justice Advisory Committee proposal would result to in an increased reliance on fossil diesel, projected at 2.8 billion gallons of fossil diesel consumption in 2030 compared to 1.9 billion gallons without feedstock limitations. Unfortunately, the approved 2025 LCFS amendments adopted the 20% vegetable oil feedstock cap, which will slow the transition away from fossil diesel and heighten demand for imported waste feedstocks, while at the same time limiting the use of U.S. soybean oil and other agricultural feedstocks in BBD production. When fully implemented in 2028, the new LCFS feedstock restrictions may increase fuel prices, undercut California's emission-reduction efforts, and directly conflict with the primary goal of the TFTP to stabilize transportation costs while transitioning away from fossil diesel.

ASA encourages the CEC and CARB to consider rescinding the 20% vegetable oil feedstock cap to avoid arbitrary limitations on BBD consumption. Instead, California should pursue biofuel policies that prioritize verified lifecycle carbon performance, traceability, and supply-chain integrity through technology-neutral policies that do not discriminate against agricultural-based BBD as the state balances transportation decarbonization with fuel price stability.

3. *Strengthen treatment of hard-to-electrify sectors, especially maritime and ports*

ASA urges the CEC and CARB to strengthen the treatment of hard-to-electrify sectors in the TFTP by explicitly recognizing BBD as a near-term solution for aviation, maritime transportation, ports, rail, heavy-duty vehicles, and off-road equipment. Maritime and port operations represent a particularly important opportunity. Ocean-going vessels, harbor craft, cargo-handling equipment, drayage operations, tugboats, ferries, and auxiliary equipment require practical decarbonization tools that can be deployed before zero-emission alternatives are commercially available at scale.

Soy-based biodiesel and renewable diesel can reduce emissions within existing engines and fueling systems while complementing long-term investments in electrification, hydrogen, and other emerging technologies. Higher biodiesel blends such as B20 and above are a valuable solution for port and maritime applications, where fleets require immediate low carbon solutions to mitigate harm to sensitive marine ecosystems. California's port decarbonization strategy should not rely on a single technology pathway. Low-carbon liquid fuels can reduce emissions now while supporting operational reliability during the broader transition.

4. *Ensure modeling reflects current science*

The TFTP should incorporate updated lifecycle carbon intensity modeling, realistic feedstock availability assumptions, and accurate co-product treatment. Modern soybean production benefits from improved yields, agronomic practices, and greater supply-chain transparency that should be reflected in current lifecycle analysis and not the two-decade old data currently utilized by CARB.

ASA encourages the CEC and CARB to evaluate soy-based biodiesel, renewable diesel, and SAF using updated data and accurate treatment of soybean oil as a co-product of high protein, meal-driven soybean production. Modeling should also assess how domestic feedstocks support fuel reliability, affordability, and GHG emissions reductions under multiple deployment scenarios, including higher biodiesel blend pathways and expanded SAF production.

5. *Maintain technology-neutral policies that support affordability and fuel reliability*

California's transportation fuel transition must reduce emissions while maintaining affordability, reliability, and consumer choice. The TFTP identifies concerns related to refinery closures, dependence on imports, infrastructure constraints, and supply volatility. Soy-based biofuels can help address these challenges through scalable, commercially available low-carbon fuels that integrate into existing transportation systems.

ASA urges the CEC and CARB to maintain technology-neutral policies that reward verified lifecycle carbon performance. Policies that disadvantage traceable domestic feedstocks risk increasing dependence on imported fuels and weakening fuel supply resilience.

A balanced strategy should include electrification, hydrogen, biodiesel, renewable diesel, SAF, and other low-carbon solutions based on performance, availability, cost, and sector-specific needs.

Conclusion/Pathway Forward

As California continues its leadership in transportation decarbonization, the CEC and CARB must develop a transition strategy that is ambitious, practical, and grounded in market realities. Soy-based biodiesel, renewable diesel, and SAF complement electrification and provide immediate emissions-reduction opportunities in hard-to-electrify sectors. ASA respectfully urges the CEC and CARB to strengthen the TFTP by updating assumptions on biomass-based diesel deployment, recognizing higher biodiesel blends, incorporating additional recommendations for the maritime and port sectors, supporting domestic biofuel feedstocks including U.S. soybean oil, removing prejudicial biofuel feedstock caps, and ensuring lifecycle modeling reflects current science. These improvements will help California reduce emissions while supporting fuel reliability, affordability, domestic supply resilience, and long-term market opportunities for biofuel production and U.S. soybean farmers.

ASA thanks the CEC and CARB for developing the Draft California Transportation Fuels Transition Plan and recognizing the necessity of biomass-based diesel in achieving decarbonization goals. We appreciate the opportunity to provide comments and look forward to continued engagement with the CEC and CARB. As California pursues a holistic transportation fuels transition, U.S. soybean farmers stand ready to produce homegrown biofuels that help achieve decarbonization goals.

Sincerely,

A handwritten signature in black ink, reading "Jd Scott Metzger". The signature is fluid and cursive, with a large, stylized "M" and "Z".

Scott Metzger, President
American Soybean Association