Comment 1 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 2 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 3 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 4 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 5 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 6 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 7 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 2nd Workshop.

First Name: Shawna
Last Name: Masters
Email Address: smasters@uci.edu
Affiliation: Student, University of California, Irvin

Subject: Environmental Effects of LCFS
Comment:

```
I have attached the comment below.
```

Attachment: www.arb.ca.gov/lists/lcfs-environ-ws/15-lcfs_comment.doc

Original File Name: LCFS comment.doc

Date and Time Comment Was Submitted: 2008-06-09 15:55:49

No Duplicates.

Comment 8 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 2nd Workshop.

First Name: Roberto
Last Name: Amadei
Email Address: ramadei1@alice.it
Affiliation: Chemical & Energy Development srl

Subject: A lifecycle low carbon fuel
Comment:

```
See the attached report, "An economic and environmental gasoline",
in its turn containing two enclosures.

Thank you for soliciting public comments.
```

Attachment: www.arb.ca.gov/lists/lcfs-environ-ws/16-lcfs.rar

Original File Name: LCFS.rar

Date and Time Comment Was Submitted: 2008-06-19 09:22:54

No Duplicates.

Comment 9 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 2nd Workshop.

First Name: Lisa
Last Name: Naef
Email Address: lnaefna2@lycos.com
Affiliation:

Subject: Low Carbon standards
Comment:

```
Have you reviewed the results of the experiment run recently at the
Haas School of Business, U. C. Berkeley on a carbon cap and trade
system?  The results show that the following statement from a Los
Angeles Times editioral was absolutely correct: "Carbon-trading
markets are easy to manipulate and produce volatile energy prices,
and the political influence of business and other lobbies can skew
the system to produce unfair outcomes."  Please we need a carbon
tax not a cap and trade system.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-06-21 11:59:33

No Duplicates.

Comment 10 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 2nd Workshop.

First Name: Tom
Last Name: Frantz
Email Address: ini@lightspeed.net
Affiliation:

Subject: low carbon fuel standard
Comment:

```
Attachment concerning increased food costs associated with
increased biofuel production.
```

Attachment: www.arb.ca.gov/lists/lcfs-environ-ws/19-tom_frantz_lcfs_june_24_2008.doc

Original File Name: Tom Frantz LCFS June 24 2008.doc

Date and Time Comment Was Submitted: 2008-06-24 13:56:26

No Duplicates.

Comment 11 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 12 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 13 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 14 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 6th Workshop.

First Name: gary
Last Name: williams
Email Address: willjo52@yahoo.com
Affiliation:

Subject: a lot less polution on automobiles
Comment:

```
It is hard to beleive that C.A.R.B. refuses to  test the fuel cell
that is part of Dutchman Enterprises which puts out a lot less
pollution . Let's cut out the political bullshit and test the Hydro
Assist Fuel Cell and lets really start loving our planet.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-11 18:14:19

No Duplicates.

Comment 15 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 6th Workshop.

First Name: Shelly
Last Name: Sullivan
Email Address: ssullivan@onemain.com
Affiliation:

Subject: LCFS Comments Regarding Economic Analysis 12?2008
Comment:

```
Attached please find a letter submitted on behalf of 43 California
business and taxpayer organizations regarding LCFS (economic
analysis) regulations scheduled to be adopted under the AB 32
Scoping Plan.

If you have any questions or need anything further, please feel
free to contact me.

Shelly Sullivan
AB 32 Implementation Group
(916) 858-8686
```

Attachment: www.arb.ca.gov/lists/lcfs-environ-ws/27-lcfs_letter_12-19-08-final.pdf

Original File Name: LCFS Letter 12-19-08-FINAL.pdf

Date and Time Comment Was Submitted: 2008-12-19 16:47:07

No Duplicates.

Comment 16 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 7th Workshop.

First Name: Roger
Last Name: Niello
Email Address: Assemblymember.Niello@assembly.ca.gov
Affiliation: Assemblyman, Fifth District

Subject: AB 32 Scoping Plan Economic Analysis Deliverables, Economic Analysis for LCFS
Comment:

```
Attachment
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Attachment: www.arb.ca.gov/lists/lcfs-environ-ws/29-assembly-california-legislature-comments_.pdf

Original File Name: Assembly-California-Legislature-comments .pdf

Date and Time Comment Was Submitted: 2009-02-04 11:02:59

No Duplicates.

Comment 17 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 7th Workshop.

First Name: Joel
Last Name: Strand
Email Address: strandjoel@yahoo.com
Affiliation: none

Subject: emissions
Comment:

This is just another example of arrogant politicians imposing its unwanted influence over people whose opinion matters not, to those in power.

I guess the the number of people that you will cause to lose their jobs , business, & homes is not as important as blaming diesel engines for Cals poor air quality, or flexing your egos. Do these people not matter to any of you? And don't even think of telling them, or me that you are looking out for them.

The old diesels will eventually dissapear on their own, as will all of us, including the overbearing.
How would any of you like it, if someone took everything from you?
I wonder what percentage of those you are about to screw over, will take their own lives? I would imagine it will be many!
You should all be ashamed.
Maybe you should go save the spotted owl again, another typical DA California plan. But gosh we are all so grateful that bird is alive and thriving, where families once did.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-12 01:24:33

No Duplicates.

Comment 18 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 7th Workshop.

First Name: Butch
Last Name: Pash
Email Address: butchmedic@gmail.com
Affiliation:

Subject: Wheel to Wheel cost?
Comment:

In my opinion it insane to waste taxpayers precious dollars on the non-existent Hydrogen Highway for which each vehicle would cost more than $1,000,000 as well as a similar if not greater cost per fueling station. I think Albert Einstein agreed when he said “The definition of insanity is doing the same thing over and over again and expecting different results”.

The enormous infrastructure and vehicle expense is currently being taxpayer subsidized? In our current economic war a new direction is essential. Please drop Hydrogen while we figure out how to payoff our current Hydrogen subsidy debt. Wheel to wheel cost for Hydrogen is just inappropriate at this time.

We (taxpayers) really do need a change in the way CARB is serving us. We continue the war for viable clean air, climate change and now an absolutely morbid economy. With the taxpayer suicide rate going up it is truly a morbid three front war! What is the wheel to wheel cost of our now increasing taxpayer suicides?

Please go back to the basics that worked. Restore the ZEV mandate that in short time created the EV1 and the Toyota RAV4EV (100,000 miles on excellent old battery technology). You do know the wheel to wheel cost of battery electric solutions. We have enough electricity and infrastructure already.

Butch Pash
Placentia, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-12 19:43:13

No Duplicates.

Comment 19 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 7th Workshop.

First Name: Pat
Last Name: Schwinn
Email Address: PSchwinn@earthlink.net
Affiliation: Montclair Presbyterian Eco-Stewards

Subject: INPUT: CA Climate Change Strategies
Comment:

```
Dear Board Members, I am convinced that we need to attack climate
change from multiple fronts - and one important one is land use
planning. If we aren't smart in our planning we will add to sprawl
that feeds increased driving.   It is important that zoning
encourage people to live close to where they work and to use mass
transit. Thanks for listening.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-15 18:13:30

No Duplicates.

Comment 20 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 7th Workshop.

First Name: Shelly
Last Name: Sullivan
Email Address: ssullivan@onemain.com
Affiliation: AB 32 Implementation Group

Subject: LCFS Comments -Life Cycle Analyses and Economic Analysis
Comment:

```
Attached please find a letter from the AB 32 Implementation Group
regarding LCFS life cycle and economic analysis issues.

If you have any questions or need anything further, please feel
free to contact Shelly Sullivan at 916 858-8686.
```

Attachment: www.arb.ca.gov/lists/lcfs-environ-ws/33-timing_letter_to_carb.pdf

Original File Name: Timing Letter to CARB.pdf

Date and Time Comment Was Submitted: 2009-03-04 11:25:00

No Duplicates.

Comment 21 for Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) - 1st Workshop.

First Name: Bob
Last Name: Winnson
Email Address: bobwinnson@gmail.com
Affiliation:

Subject: Following the Green for Carbon Dioxide
Comment:

September 18, 2009

Good day,

I congratulate ARB on requesting a panel of scientists to determine the additional indirect effects of all fuels. I remain concerned that the selection of the scientists may include those listed in the original message below (who may be more activists with an agenda rather than scientists), or others that would have similar vested interests.

Thank you for now including the following message that originally appeared in LCFS09 Public comments but unfortunately appears to have been removed since.

April 21, 2009

Mary D. Nichols, Chairwoman
California Air Resources Board
c/o Clerk of the Board
1001 I Street
Sacramento, California 95814
Electronic submittal:
http://www.arb.ca.gov/lispub/comm/bclist.php

Dear Chairwoman Mary Nichols:

Many congratulations on your and other board members' tireless efforts in establishing what will become an LCFS framework for many states, and perhaps the nation. In particular, it is intriguing that ARB has been able to select a couple of scientific studies for the indirect land use change (iLUC) of biofuels, particularly when the majority of uninvolved knowledgeable scientists agree that this topic is very early in its development, the science cannot be backtested, and that is has to be based on assumptions. By choosing those that have the most damaging outcome for biofuels, you have certainly made many of those vocal in the environmental arena very pleased. It is especially interesting that you have been able to select indirect effects for certain biofuels alone, and have left off those for other fuels. Of particular interest is that while at least half of California's petroleum comes from other regions such as the Middle East and Colombia, and in the future will increasingly rely on carbon intense (and other extreme environmental damages) tar sands and oil

shale, you have been able to establish the LCFS for gasoline as merely that domestic to California.

The LCFS iLUC values for biofuels results directly from assumptive computer modeling done by Timothy Searchinger of Environmental Defense, and Joseph Fargione of the Nature Conservancy. Environmental Defense receives funding from W.K. Kellogg Foundation(the Kellogg's that is part of the Grocery Manufacturers Association which funded an aggressive anti-corn ethanol PR campaign starting in early 2008). Kellogg also provides funding to the Nature Conservancy and to the Rockefeller Family Fund (obvious connections to ExxonMobile). The Rockefeller Family Fund provides funding to the Environmental Working Group, which has been consistently negative to corn ethanol and large corn farms in general. Another source of funding is the Joyce Foundation, which provides funding to the Union of Concerned Scientists (who have submitted their comments and 177 scientists letter to ARB in favor of biofuels' iLUC outcome), the Nature Conservancy, and the Environmental Working Group.

Joseph Fargione (Nature Conservancy) is tied into Searchinger's work through Environmental Defense, both funded by W.K. Kellogg. The Washington Post on May 4, 2003 published an investigative report on the Conservancy. Though it had its purposeful upstart decades early, the Conservancy had greatly expanded to the point that it had officials with large polluting corporations on its board, who would use it for positive PR about their environmental projects. It was revealed that ExxonMobile and BP hold leadership counsel seats on the Conservancy, donating $5 million. Philips Alaska, a supporter of drilling in ANWR, donated $1 million. Regarding land use change, the Conservancy forged a partnership with Centex Homes, which up to 2003 had built 400,000 homes in urban sprawl (Centex had given and pledged $3 million to the Conservancy). Also allied with the Conservancy are International Paper and Georgia-Pacific ($3 million given), logging companies. The logo of the Conservancy was used on General Mills' products, which held a seat on the board of the Conservancy and is a member of the Grocery Manufacturers Association.

The information is available at:

http://pqasb.pqarchiver.com/washingtonpost/access/332205031.html?dids=332205031:332205031&FMT=ABS&FMTS=ABS:FT&fmac=&date=May+4%2C+2003&author=&desc=TODAY+++Inside+the+Nature+Con+...

http://www.wildlifeprotection.net/everything/NatureConservency.html

http://www.discoverthenetworks.org/groupProfile.asp?grpid=6940

Sitting on today's board of the Conservancy is Stephen Polasky, who in early 2009 followed up with a study determining that corn ethanol also would release as much or more CO2 emissions as gasoline.

http://www.greenbiz.com/news/2009/02/06/corn-ethanol

http://www.nature.org/aboutus/leadership/art15462.html

Regardless of their stance on corn ethanol, the absurdity of GM having their Senior Advisor and former Corporate Vice President on the Conservancy Board seems to further decrease its integrity,

pointing out that still today it is not the environmentally-focused, corporation-disconnected group from its early days.

Also serving on the Conservancy board is former under secretary of state for global affairs and climate change, Frank Loy. He also serves on the board of Environmental Defense. A third board he sits on is the Pew Center for Global Climate Change, which is funded by Sun Oil/Sunoco, and now also includes BP and Shell. Together, the Pew Center and Environmental Defense formed the Partnership for Climate Action (PCA). A strong endorser of market-based mechanisms to reduce carbon dioxide emissions, the individuals and companies of PCA plan to benefit handsomely from the profits. There are some other big partners in PCA now—Carlyle Group, Berkshire Partners, Morgan Stanley, the CEO of Carbon Investments, and Goldman Sachs. The latter invested in photovoltaics with Sun Edison, acquired Horizon Wind Energy, and purchased a stake in Iogen Corp., a cellulosic ethanol company that would likely benefit from a higher corn ethanol iLUC and LCFS value, and Goldman Sachs has touted itself to become “the market maker in CO2 emissions trading.” On the Conservancy board sits Maneer Satter, Managing Director at Goldman Sachs.

This information is found here:

http://www.globalresearch.ca/index.php?context=va&aid=5568

This ties investment banks, food companies, and oil companies to the researchers that ARB is basing its iLUC and LCFS values for corn ethanol and other biofuels upon. Daniel Sperling, ARB voting member, published his “Low Carbon Fuels Standards” in the Winter 2009 issue of Science and Technology. ARB has also linked his papers on their website. His article, which is highly critical of corn ethanol, references Timothy Searchinger as one of three sources of information. Indeed, Daniel Sperling has a long relationship with the oil and automobile companies, and his Institute of Transportation Studies at UC Davis receives million of dollars from these same companies, also including Chevron and ExxonMobile.

This information is found here:

http://articles.latimes.com/2008/apr/11/business/fi-airboard11

There are numerous other seeming conflicts of interest that exist with voting members, going straight to the top, at ARB and CEC that I will not detail, as they involve marriage relationships (spouses employed by large oil companies and lobby firms) and very significant personal financial stakes in oil companies. These have been reported in the mainstream press should anyone be interested.

The issue at hand is that corn ethanol and soybean biodiesel are not easily controlled financially by these large fuel companies. Hydrogen, electricity, natural gas, etc. seemingly would be. Also, the investment banks and food companies have a vested interest in decreasing the use of corn ethanol and controlling the carbon trading market.

You see how this presents a problem, when the only indirect effects that ARB is considering at this point are those of these biofuels. I strongly encourage you to include direct effects, but only when all can be scientifically (not assumptions and worst case

computer models that can’t be backtested) agreed upon by the majority of uninvolved scientists. ARB is not at that point, and would be allowing itself to be an instrument of the above conflicts were it to continue with the absurdity of the current iLUC and LCFS values of these biofuels alone.

Respectfully,

Bob Winnson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-09-18 23:00:50

No Duplicates.

There are no comments posted to Low Carbon Fuel Standard - Environment and Economic (lcfs-environ-ws) that were presented during the Workshop at this time.