February 12, 2009

Manisha Singh

Lead, Policy and Regulatory WG

California Air Resources Board

1001 I Street

Sacramento, California 95812

VIA ELECTRONIC MAIL: mansingh@arb.ca.gov

RE: Draft Low Carbon Fuel Standard (LCFS) Regulation – January workshop

Dear Ms. Singh:

I am the Marketing Director for a biodiesel production and distribution company located in the Bay Area. We are presently building a low-impact biodiesel plant at a wastewater treatment site and have received ARB funds to do so. Our company has been in business for 5 years and has created a large base of consumers that support and endorse the usage of biodiesel and biodiesel blends.

I write today to comment on the draft LCFS regulation as discussed at the January 30, 2009 workshop and to encourage an accelerated timeline for Biodiesel and other diesel alternatives.

I appreciate the change made in the implementation timeline from the December workshop to begin implementation in 2011 but request more be done. According to the California Energy Commission, California is using 43+million gallons of Biodiesel per year. California has nine Biodiesel plants operating, with an estimated total production capacity of 63 million gallons per year; another 4 plants are idle and at least one is under construction. The existing infrastructure is more than capable of meeting the demands of a one percent reduction in carbon intensity beginning January 2010. Furthermore, according to the California Energy Commission, the current AB 118 investment plan will allocate funding towards the development of biodiesel blending and distribution infrastructure. I strongly recommend ARB to revise the implementation timeline for the diesel fuel pool to include more aggressive decreases in carbon beginning in 2010.

Thank you for your consideration of these comments. Should you have any questions or need additional information please call me at 425-772-2963.

Sincerely,

Kevin J. Kuper