



March 26th, 2009

Mary D. Nichols, Chairman
California Air Resources Board
1001 "I" Street,
Sacramento, CA 95812

RE: Low Carbon Fuel Standard

Dear Chairman Nichols,

Energy Independence Now (EIN) would like to thank you for the opportunity to comment on the proposed Low Carbon Fuel Standard. We will be submitting detailed comments and suggestions soon, but at this stage would like to express our support for the LCFS, and recognize the major effort CARB has invested in this groundbreaking rule. In particular, our support recognizes three areas we believe CARB's proposed LCFS helps to advance:

1. **Better Biofuels for low level blending.** The structure of the regulation is well designed to ensure that the best biofuels are blended into our gasoline and diesel, and to promote the development of a new generation of lower-carbon ethanol and renewable diesel production.
2. **Life Cycle Analysis, including indirect Land Use Changes.** We commend CARB staff on its work in setting standards for life cycle analysis of fuels. As more fuel pathways are published, CARB's LCA values will become benchmarks for other states and nations to refer to in assessing their fuels and methodology. We also support CARB's decision to incorporate the indirect land use effects of fuel production, a key LCA component that will ensure we achieve true global GHG reductions, and limit the competition between fuels and food.
3. **Environmental Reporting.** We believe the LCFS requirements for feedstock reporting, and CARB's commitment to continue developing sustainability and environmental safeguards is a critical element of the LCFS, and look forward to continued progress on those fronts.

We will be submitting detailed comments shortly on our concerns about the LCFS, which include some unintentional barriers that need to be addressed to better enable fuel innovation, and the insufficient incentive it provides for *non-liquid*, ultra low carbon fuels.

Sincerely,

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Daniel Emmett
Executive Director

A handwritten signature in black ink, appearing to read "Remy Garderet", written on a light-colored rectangular background.

Remy Garderet
Clean Transportation Program