

# Inglewood



# California

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RICK D. LONGOBART  
Fleet Management and Transit Services  
Chair Environmental Advisory Committee

**April 22, 2009**

The CBA urges the ARB to adopt the LCFS.

### **Implementation Timeline.**

- We agree with concerns voiced by other groups such as the Union of Concerned Scientists that much more needs to be done to reduce GHG/carbon emissions in the early years of LCFS - a unit of carbon/GHG reduction today is worth more than a comparable reduction in the future.
- Revise the implementation timeline for the diesel fuel pool to include more aggressive decreases in carbon intensity beginning in 2010.
- 1% reduction could be achieved with 31 to 35 mgpy of California produced biodiesel made from waste feedstocks such as animal fats and used cooking oils (the latter is based on an LCFS pathway for biodiesel produced in California using inedible animal fats and used cooking oils achieving a 70% and 80% reduction respectively in carbon intensity versus the current petroleum diesel baseline of 94.71 gCO<sub>2</sub>e/MJ).
- California has nine biodiesel plants either currently operating or engaged in commissioning with a combined production capacity of approximately 63 million gallons per year; another 4 plants are idle and at least one other is under construction. Thus, California's 2009 biodiesel production capacity is more than capable of meeting the demands of a 1% reduction in carbon intensity beginning January 2010.

### **Fuel Pathways**

CBA urges ARB to develop and publish LCFS fuel pathways for biodiesel produced in California and for biodiesel using waste feedstocks such as used cooking oil and inedible animal fats.

Sincerely,

Rick D. Longobart  
Fleet Superintendent, Chair Environmental Advisory Committee