

**American Bottom Conservancy \* American Lung Association of California  
Calumet Project \* Center for Energy Efficiency and Renewable Technologies  
Clean Water Action \* Clean Wisconsin \* Coalition for Clean Air  
Corporate Ethics International \* Dogwood Initiative \* EARTHWORKS \* Ecology Center  
Environment America \* Environment California \* Environmental Defence Canada  
Fresh Energy \* ForestEthics \* Friends of the Earth \* Global Community Monitor  
Indigenous Environmental Network \* International Indian Treaty Council  
Natural Resources Defense Council \* Oil Change International \* Pembina Institute  
Rainforest Action Network \* Save Union County \* Union of Concerned Scientists**

The Honorable Mary Nichols  
Chairwoman, California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

April 13, 2009

Dear Chairwoman Nichols,

On behalf of our millions of members and activists, we voice our strong support for the Low Carbon Fuel Standard (LCFS) and CARB's inclusion of provisions to address high carbon intensity crude oils. The California LCFS is a critical tool that incentivizes cleaner fuels while also protecting California against increasing greenhouse gas (GHG) emissions from high-carbon intensity fuels, including those derived from Canadian and U.S. tar sands, oil shale, and liquid coal.

Compared to conventional oil, the production of these fuels will emit as much as three to six times the GHG emissions, threatening to undermine California's many efforts to reduce transportation emissions.<sup>1</sup> The development of these ever-dirtier, fossil-fuel sources to produce transportation fuels has enormous consequences not only for our climate, but the air we breathe, the water we drink, and our wild lands and wildlife in North America.

We applaud CARB's intent to provide additional pathways that distinguish between both lower carbon intensity fuels *and* higher carbon intensity fuels. Doing so will help ensure accurate accounting of emissions and establish a level playing field for all fuels. Without these provisions, there would be nothing to prevent the petroleum baseline from becoming increasingly worse over time, offsetting the GHG emission benefits of the program.

We ask that the Board support CARB's efforts to address high-carbon intensity fuels by including provisions to differentiate these fuels. We also request in particular, that specific

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<sup>1</sup> Alex R. Brandt and Alexander E. Farrell (2007), "Scraping the bottom of the barrel: greenhouse gas emission consequences of a transition to low-quality and synthetic petroleum resources." *Climate Change*, **84**, 241-263. The mid-points of low and high upstream carbon intensity values were used.

pathways for tar sands, oil shale, and liquid coal continue to be developed and released for public review and comment. For example, the current default assumptions in the GREET lifecycle model for tar sand pathways are based on secondary references and non-public data sources. We support CARB's continued efforts to update these estimates in an open and transparent manner. Doing so will allow for more accurate assessments to be made and the correct market signals to be placed on both low and high-carbon intensity fuels.

We look forward to the Board's approval of this rule and thank you in advance for addressing our requests.

Sincerely,

Kathy Andria  
President  
**American Bottom Conservancy**

Bonnie Holmes-Gen  
Senior Policy Director  
**American Lung Association of California**

Steve Kozel  
President  
**Calumet Project**

John Shears  
Research Coordinator  
**Center for Energy Efficiency and Renewable Technologies**

Peter Taglia  
Staff Scientist  
**Clean Wisconsin**

Lynn Thorp  
National Campaigns Coordinator  
**Clean Water Action**

Will Horter  
Executive Director  
**Dogwood Initiative**

Shankar Prasad  
Executive Fellow  
**Coalition for Clean Air**

Charles Griffith  
Clean Car Campaign Director  
**Ecology Center**

Michael Marx  
Executive Director  
**Corporate Ethics International**

Michael Noble  
Executive Director  
**Fresh Energy**

Bruce Baizel  
Senior Staff Attorney and Program Director  
No Dirty Energy Campaign  
**EARTHWORKS**

Timothy Telleen-Lawton  
Global Warming Advocate  
**Environment America**

Matt Price  
Project Manager  
Climate and Energy  
**Environmental Defence Canada**

Danielle Fugere  
Regional Project Director  
**Friends of the Earth**

Caitlyn Toombs  
Global Warming Associate  
**Environment California**

Ed Cable  
Co-chairman  
**Save Union County**

Aaron Sanger  
Senior U.S. Energy Campaigner  
**ForestEthics**

Denny Larson  
Executive Director  
**Global Community Monitor**

Tom Goldtooth  
Executive Director  
**Indigenous Environmental Network**

Andrea Carmen  
Executive Director  
**International Indian Treaty Council**

Liz Barratt-Brown  
Senior Attorney  
**Natural Resources Defense Council**

Steve Kretzmann  
Director  
**Oil Change International**

Dan Woynillowicz  
Director, Strategy & External Relations  
**Pembina Institute**

Michael Brune  
Executive Director  
**Rainforest Action Network**

Patricia Monahan  
Deputy Director for Clean Vehicles  
**Union of Concerned Scientists**

CC: Governor Arnold Schwarzenegger  
Board Members, California Air Resources Board  
Secretary Linda Adams, Cal/EPA  
Mr. James Goldstene, Executive Officer, California Air Resources Board