



December 12, 2011

[by electronic submittal to <http://www.arb.ca.gov/lispub/comm/bclist.php>]

Mary D. Nichols, Chair  
California Air Resources Board  
1001 I Street, Sacramento, CA 95814

**Re: October 26, 2011 CARB Proposed Amendments:  
Low Carbon Fuel Standard, Title 17 CCR, Section 95480 *et seq.***

Dear Ms. Nichols,

The Alliance of Automobile Manufacturers (Alliance) welcomes the opportunity to comment on California's proposed amendments to its Low Carbon Fuel Standard (LCFS), noticed on October 26, 2011.

The Alliance is an association of 12 vehicle manufacturers including BMW Group, Chrysler Group LLC, Ford Motor Company, General Motors Company, Jaguar Land Rover, Mazda, Mercedes-Benz USA, Mitsubishi Motors, Porsche, Toyota Motor, Volkswagen Group and Volvo Cars, representing approximately 75% of new car sales in the USA. Formed in 1999, the Alliance is open to all new car and light truck manufacturers and serves as a leading advocacy group for the automobile industry on a range of public policy matters, particularly environmental and safety issues.

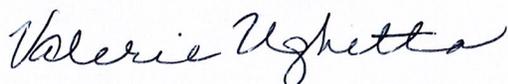
We strongly support the low carbon fuel concept, and appreciate the ongoing efforts of CARB staff to continue to amend the LCFS and develop a workable program. Achieving California's goal of an 80% reduction in greenhouse gases GHG's by 2050 will require low carbon transportation fuels to play a substantial role in complementing the ongoing contributions of automobile manufacturers. Therefore, actions to further enhance regulation and reduce the carbon intensity of the transportation fuel pool are critical components to reaching that goal.

Our primary focus for this program is to be as effective as possible in bringing significantly lower carbon fuels into widespread usage. To this end, we appreciate CARB's actions to continue adding more fuel pathways (to depict real market developments), expand opt-in provisions and update its LCA modeling to ensure that each pathway is treated equally. We also think that it is appropriate at this time for the standard to focus primarily on liquid biofuels, as these fuels are the predominantly available low-carbon options in the market. We strongly support the findings of the Low Carbon Fuel Standard Advisory Panel that it would be premature at this time to adjust the compliance schedule, and that such adjustments could be potentially harmful to the development of markets for lower carbon fuels.

Finally, while we appreciate California's leadership in developing a workable plan to encourage the introduction of low carbon fuels, we believe a single, integrated, national program provides the most cost-effective approach to reducing the carbon content of transportation fuels. A federal approach to low carbon fuels also will help assure broad availability, market fungibility, maximum supply and lowest cost, both regionally and nationally.

In conclusion, we support CARB's efforts to further refine and amend its LCFS so that we rapidly expand the use of lower carbon fuels and stay focused on a long-term vision for sustainable energy and transportation. Our members commit to continue working with CARB to help make California's low carbon fuel program as successful as possible.

Sincerely yours,



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cc: Hard copy posted to Clerk of the Board,  
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